

Report for Resolution

Report to Executive
30 June 2010

Report of Head of Planning and Regeneration

Subject Joint Core Strategy for Broadland, Norwich and South
Norfolk – Progress towards Examination and
Advertisement of Potential Changes

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Purpose

To provide an update on progress being made in relation to the Joint Core Strategy (JCS) and seek delegated powers to agree the detail of possible changes to the JCS for consultation.

Recommendations

1. To note this report; and
2. To delegate authority to the Director of Regeneration and Development, in consultation with the Portfolio Holder for Sustainable City Development, to agree the detail of the potential changes to the JCS to be published by the Greater Norwich Development Partnership for public consultation over the summer.

Financial Consequences

The direct financial consequences of this decision can all be met from within existing budgets allocated for purposes related to JCS. Failure to agree to consult on possible further changes to the JCS to this timetable would increase the risk of the JCS not commencing its Examination in Public within the timetable required by the Planning Inspectorate and effectively increase the risks of a withdrawal of the JCS being required. Failure to agree possible further changes to the JCS that respond to the Inspector's concern increase the risks of the JCS being found unsound.

Both withdrawal of the JCS or it being found unsound would have very significant financial consequences for the authority. Albeit these are difficult to quantify at present.

Risk Assessment

In addition to the financial risks associated with this issue members were advised on the risks to soundness in considering the submission version of the JCS at Council on 2nd March.

This report stressed “Although there can be no guarantee that the JCS will be found sound, or will not be susceptible to legal challenge, delaying progress on the strategy is likely to increase the risk of planning proposals coming forward, possibly in locations that are not supported by the emerging strategy and potentially not delivering infrastructure and the positive policy framework needed to support regeneration, development and growth across the greater Norwich area. GNDP Councils are increasingly vulnerable to challenges as to whether they have a five-year land supply for new homes (as required by government policy) and important decisions may be made at planning appeals.”

Although to some extent the risk of challenge on grounds of inadequate housing land supply may be considered to have reduced by virtue of the Government’s announcement of 27th May that it intended to rapidly abolish Regional Strategies and return decisions of housing supply to Local Planning Authorities without the framework of regional numbers and plans. Until further detail of the possible changes to the planning system are made clear these risks are uncertain and maintenance of a 5 year housing land supply remains a material planning consideration.

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” and the service plan priority to Work with colleagues in the GNDP to promote the Joint Core Strategy through its Public Examination to secure its adoption to provide a sound basis for the future planning of Norwich.

Executive Member: Councillor Morrey - Sustainable City Development

Ward: All

Contact Officers

Graham Nelson

01603 212530

Background Documents

Local Development Framework Working Party Paper 17th June 2010 – Update on the Joint Core Strategy.

Report

Background

1. On 2nd March 2010 Norwich City Council resolved to agree that: 1) the 'Joint Core Strategy for Broadland, Norwich and South Norfolk: proposed submission document (November 2009)' as amended by the schedule of proposed minor changes is legally compliant and sound; and 2) submit those documents together with the revisions to previously adopted local plan proposals maps and all necessary supporting documents to the Secretary of State under Regulation 30 of the Town and Country Planning (Local Development) Regulations, 2004 (as amended).
2. In accordance with the above resolution the JCS was formally submitted on 5th March 2010. The Secretary of State appointed Inspector Roy Foster MA MRTPI and Assistant Inspector Mike Fox BA (HONS) DIPTP MRTPI to conduct the examination to determine whether the Development Plan Document was sound.
3. On 13th May the Inspectors held an Exploratory Meeting on a number of issues. Subsequent to this meeting (on 24th May) JCS Inspectors published their conclusions following the Exploratory Meeting. These are attached as appendix 1 to this paper and deal with 6 issues: Infrastructure, affordable housing, distribution of development particularly in relation to public transport, the Northern Distributor Road, sustainability issues, and the North East growth triangle. This has resulted in the start date for the Examination in Public (EiP) being postponed from June. This is now scheduled to commence in October.
4. Work is currently underway in relation to all six of these issues. Except for affordable housing where specialist external advice is needed, all this work is being conducted by the GNDP officers as a matter of urgency.
5. Papers for the GNDP Policy Group meeting on 24th June (attached to this paper as Appendix 2) provide an update on progress on this work and give a feel for the degree of change to the JCS that may be considered necessary by the GNDP. Where substantive change is considered necessary, public consultation will need to be undertaken and consideration will also be needed of whether further Sustainability Appraisal work is required.
6. The papers give an indication of where substantive changes are likely to be considered to be necessary. These include:
 - Policy H4: Housing Delivery – the results of the Affordable Housing Study will determine whether the policy requires amendment;
 - Affordable Housing numerical targets to address the request of the Inspector;
 - Additional appendix: North-east concept statement; and

- Sustainability appraisal.
7. Matters where work is ongoing not listed above are likely to result in additional justification being submitted to the Inspectors to address the points raised. In some cases this may include minor change to the JCS text to update or clarify it but should not introduce substantive change.
 8. In addition to the work necessary to respond to the Inspectors concerns, further work is also being undertaken on the implications of recent government announcements about the abolition of Regional Spatial Strategies. This is addressed in paper 6a to the policy group which identifies a number of possible options ranging from continuing with the JCS with no change to abandoning the JCS. It recommends that authorities continue with the current JCS with suitable minor changes and further supporting evidence produced.
 9. A verbal update will be given to the meeting summarising the outcome of the policy group on 24th June and whether any further details of the scope of possible changes likely to be consulted on can be given.
 10. Members may wish to be aware that the situation is complicated as there is no provision in the development plan regulations for local authorities to amend a JCS following formal submission. Therefore any consultation that is conducted over the summer will be on potential changes to the JCS. A report back to full Council on 28th September will be needed to summarise the responses to the consultation and consider whether the Council is prepared to recommend that these changes be made to the Inspectors. Any formal changes to the submitted JCS will have to be made by way of the Inspector's report.
 11. This report seeks delegated authorities for officers to agree the detail of the changes to be the subject of consultation over the summer. This is necessitated by the very challenging timescale to get the work done that is needed to allow the EiP to commence. Advice from the Planning Inspectorate indicates that where an EiP is delayed to allow further work to be conducted or changes to be considered then it should be possible to hold the EiP within six months of the exploratory meeting. A longer delay would normally suggest the plan should be withdrawn to allow the work to be done.

**Examination into the Joint Core Strategy for Broadland,
Norwich and South Norfolk produced by the Greater
Norwich Development Partnership
Inspectors • Inspector Roy Foster MA MRTPI and
Assistant Inspector Mike Fox BA(HONS) DIPTP MRTPI
Programme Officer • Simon Osborn BA TechRTPI
1 Lower Farm Cottages, Putttock End, Belchamp Walter,
Sudbury, Suffolk CO10 7BA
Tel 01787 238097, Email simon@poservices.co.uk**

Conclusions from the Exploratory Meeting (EM)

At the EM on 13 May it was concluded that it would be inappropriate for the examination to proceed to the hearings sessions in w/c 12 July because further work needs to be undertaken on a number of matters. This letter sets out the way that we have developed our observations and comments on those matters. As we indicated at the EM, the matters below are not in any particular priority order.

1 Infrastructure

The Planning Inspectorate (PINS) document 'Examining DPDs: Learning from Experience' refers to important soundness-related matters on this topic (p7-8).

We drew attention (in our original Q1-2) to the categorisation in Joint Core Strategy (JCS) Appendix 7 of 80 infrastructure items as 'critical', either to the JCS as a whole or to certain parts of it. Identification of all these items as 'critical' could pose the risk of the JCS (or certain parts of it) being found unsound if the examination were to throw doubt on the timely delivery of any of these items. Para 26 of the PINS advice makes it clear that it is unhelpful to include reference to an infrastructure project if such reference is effectively a tactical means of adding weight to the case for a project which the provider is unlikely to be able to fund or support within the relevant timescale.

The PINS advice recognises the role that a complementary 'live' document such as Greater Norwich Development Partnership's (GNDP) proposed Integrated Development Programme (IDP) can play in setting out the detailed steps necessary to realise the proposals of a Development Plan Document (DPD). It will be useful if the first version of this is available for the hearings. However, as the advice states (para 27), the key infrastructure items required to enable delivery of the major developments in the DPD need to be firmly and clearly identified in the DPD itself and their implementation shown to be reasonably assured.

Firmer evidence would be available about the major development-related elements of the JCS if 'critical path' evidence were to be

prepared setting out the links between each of the key housing growth areas (in the table at p12 of the relevant topic paper - TP8) and the infrastructure necessary for their completion within the timescale of the housing trajectory indicated on p13 of TP8.

It would be helpful if the critical path can be augmented by brief information about the providers and funders in the case of each piece of infrastructure, together with information drawn from the evidence base about the degree of sign-up of the providers (see PINS advice para 22). It was somewhat concerning that GNDP seemed to take the view that service providers cannot confirm their intentions until the JCS is 'in place'. This is not the way that Planning Policy Statement 2: Local Spatial Planning (PPS12) or the PINS advice considers 'effectiveness'. Proposals in DPDs are unlikely to prove sound if the relevant providers have not indicated that there is a reasonable prospect that linked infrastructure can be completed on time.

It would also be helpful if the critical path can identify which infrastructure projects are truly 'critical' and which may be of lesser importance but still desirable, since we have found that the evidence base can convey mixed messages about (a) the degree of criticality of certain infrastructure projects (ie to extent to which they represent a fundamental constraint on the commencement of development) and (b) the likelihood of their delivery within the necessary timescales.

[We recognise that the infrastructure needs of the major development locations do not stand entirely alone but have to be considered alongside the needs generated by committed or anticipated development within the main urban area and the 'other sites' to be allocated in Broadland and South Norfolk, and that assumptions about these other sites have to be built into the critical paths. It will therefore be important to include some clear information about those assumptions in this exercise.]

2 Affordable housing (AH)

Planning Policy Statement 3 Housing (PPS3) para 29 states that Local Development Documents (LDDs) should set out the range of circumstances in which AH will be required in terms of both thresholds and proportions. It also requires an informed assessment of the economic viability of such proposed thresholds and proportions. At the EM we indicated our concern that the economic viability testing in documents H5 and INF1 may not be fully robust and credible.

With regard to document H5, our concerns are as follows:

Very considerable weight is placed on the availability of grant. The report itself concludes (para 5.5) that if funding from the Homes and Communities Agency (HCA) is unavailable then 'a number of sites are unviable at 40% AH even in a strong market and the majority would not come forward in a weak market'. Para 5.6 of H5 itself concludes that if grant funding does not continue to be available at levels consistent with those previously seen within Norwich, 'the viability of the 40% AH target in the majority of previously developed land (PDL) sites may be affected and this target in Norwich's policy should be reconsidered'.

Bearing in mind the step-change in the total number of AH units being sought across the 3 Districts, it is presumably the case that even if the total grant sum available to the JCS area were to remain constant (or even increase a little) the average size of the grant for each unit of AH that it is hoped to secure will reduce significantly. In those circumstances the available grant would either be spread so thinly that it may make little difference to the financing of individual schemes, or the proportion of schemes able to benefit from a significant grant would be small. If grant availability were to reduce in future this effect would of course be magnified.

Two of the 6 schemes appraised (allotments and private playing fields) had low existing use values (EUVs) and this factor may have had a significant effect on the balance of the overall conclusions about viability drawn from the tables in para 4.1.

It is also unclear whether the report benefited from sufficient information about actual land purchase prices (see paras 2.5 and 2.6) or made realistic assumptions about the land price necessary to incentivise landowners to release their land. The footnote to the table in para 4.1 suggests that £100,000 may have been taken as a universal figure; it may be in certain cases, but possibly not in others (eg large sites).

Turning to INF1, while we appreciate the logic of considering AH in the wider context of a tariff-based approach to other infrastructure, the appraisals are understandably theoretical and not easy to follow because they are expressed in very high level terms and somewhat opaquely explained, and the interrelationship between AH and other infrastructure funding is not particularly clear. However, like H5, this study also assumes a high level of grant availability and stresses the criticality of this factor.

While document H5 assumes S106 contributions of £1,152 and £3,646 per dwelling (in schemes yielding 20-32% AH), document INF1 assumes much higher infrastructure contributions (£19,500) in

Norwich combined with an AH demand for 40%. As INF 1 concludes (p222), this 'places a significantly more onerous financial commitment on developers in comparison with what has typically been agreed in the past, and will require a shift in "sentiment" from developers in order to achieve this level of contributions'. [We observe here that whether or not development land is brought forward is a matter of financial calculation rather than sentiment.] INF1 implies that very heavy reliance is placed on captured land value, a factor that requires more testing for its credibility in terms of its robustness, deliverability and capacity not to prevent landowners bringing forward their land.

INF1 finds that (compared with Norwich) much higher infrastructure gaps exist in many other proposed JCS development areas and concludes that significant negative land values would result, even in strong market conditions, if it were to be attempted to recoup full infrastructure costs.

Additional factors

1 PPS3 para 29 requires that LDDs should set an overall (ie plan-wide) **target** for the amount of AH to be provided. It is not clear that such a numerical target for the plan period has been devised, taking account of committed housing developments with existing planning permission and developments on sites below the proposed JCS site size threshold. Without such an overall target it may be more difficult to monitor the success or otherwise of the policy. [On a related matter, it would also be helpful to the understanding of the JCS if it gave some perspective on the number of units expected to result from the rural exceptions schemes clause of policy 4.]

2 PPS3 para 29 also indicates that LDDs should set separate targets for social rented and intermediate AH where appropriate; specify the size and type of AH likely to be needed in particular locations; and set out the approach to developer contributions. The JCS appears to indicate that other LDDs will fulfil some of these functions, but greater specificity on this point would be helpful to the clarity of the JCS.

3 Incidentally, we note that para 1.9 of H5 states that if the Council wishes to rely upon that report as evidence at a Planning Examination 'the report would be amended to reflect the nature of that process'. We seek further clarification about the implications of that statement.

Conclusion

It appears that further work is required to take account of the above points. It is not for us to specify the precise methodology of such work, but in our view it should provide a more transparent assessment of the realistic capacity of the market to deliver AH in association with much higher infrastructure contributions and code standards. Factors that need to be considered and tested are:

- Strong and weak market scenarios;
- The margin required between existing/alternative use value and residual land value in order to incentivise landowners to bring their land to the market (establishing a clear measure, based on local evidence);
- A selection of S106/tariff/Code for Sustainable Homes assumptions, ranging from those secured in the H5 study up to the levels implied by the INF1 study;
- The viability within the immediately foreseeable future of a range of proportions of AH below and up to 40% (with the potential for review if circumstances change further into the plan period);
- Any potential for different proportions of AH to be sought in different geographical locations or development areas if the work indicates significant variations in land values and development costs across different parts of the JCS area.
- Some overt testing of the proposed reduced site size threshold of 5 units.

In addition, normal reliance should not be placed on grant availability (albeit recognising that this could, in some circumstances, be an exceptional factor bringing viability to a limited number of otherwise unviable schemes).

Following this work, consideration will need to be given to the nature of any changes that may be needed to make the JCS sound in relation to AH. [Within this exercise account will also need to be taken of the 'additional factors' referred to above.]

3 The distribution of development, particularly in relation to public transport opportunities

Our original Q8-9 referred to the note of the Pre-Engagement Inspector's visit. This stated that clear evidence would be needed to demonstrate that option 2A (which has effectively the same distribution as the JCS) was 'the most appropriate when considered against the reasonable alternatives'. At the time of her visit in early 2009 she felt that 'there is very little evidence to support a conclusion that it is' and that 'without such evidence there is a real

risk that a Core Strategy based on option 2A could be found unsound’.

At the EM we explained the continuing importance of having a firmly-evidenced basis for the judgement that it will be necessary to make on this matter. We referred to the subsequent Regulation 25 public consultation, which described the 4 options (the JCS option and options 1-3) but set out no comparative analysis or them. However, it appears that document EIP14, the Sustainability Appraisal (SA) for the Regulation 25 consultation, does carry out such an analysis. Concentrating on the medium term assessment (5-20 years) it appears that Option 1 scored 26 pluses and 2 minuses, with 2 matters identified for further investigation. Option 2 scored 22 pluses and 2 minuses, with 2 matters identified for further investigation. Option 3 scored 21 pluses and 2 minuses, with 3 matters identified for further investigation. Option 2A scored 16 pluses and 2 minuses, with 4 matters identified for further investigation. The tone of the qualitative remarks about the options generally reflects these comparative scores and the relatively less favourable ranking of option 2A.

Our note for the EM referred, in particular, to the issue of whether or not the JCS provided the most appropriate strategy for meeting the objective of East of England Plan policy NR1 – ie that this major regional growth point should ‘achieve a major shift in emphasis across the Norwich Policy Area (NPA) towards travel by public transport, cycling and walking’. This reflects the national objectives in Planning Policy Guidance Note 13 Transport (PPG13) of promoting more sustainable transport choices, promoting accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and reducing the need to travel by car, particularly (para 6) by actively managing the pattern of urban growth to make the fullest use of public transport and accommodating housing within urban centres or at locations which are highly accessible by public transport, walking and cycling.

Considering the scale of the new development proposed in the NPA, its distribution through the JCS area should be capable of opening up major opportunities for making a substantial contribution to the above objectives, provided that it is located and managed appropriately and specific, measurable, achievable, realistic and time-scaled modal shift targets are firmly established to monitor this.

In this respect we drew attention at the EM to the SA of the JCS (JCS3) which records that the strategy for major expansion of a number of existing communities in South Norfolk places increased difficulty in achieving ‘a degree of self-containment and providing attractive public transport options that encourage people to use

their cars less'. The SA summary finds that growth in the A11 corridor is focussed on areas 'where there should be the potential to connect to Norwich via a bus rapid transit service, although it is difficult to be completely certain about deliverability/financial viability at this stage'. Perhaps tellingly, para 2.2.57 of the SA states that none of the growth areas under the South Norfolk distribution are of sufficient size to support a turn-up-and-go bus service in, even in 2021. Even the combined proposal for 4,400 dwellings on the A11 corridor at Wymondham, Hethersett and Cringleford is said at [2.2.59] to be at the borderline of providing a potential market sufficient in size to support the development of Bus Rapid Transit (BRT) services.

The growth proposed for Long Stratton poses particular soundness concerns. The SA identifies Long Stratton as standing out as 'less suited to encouraging more sustainable patterns of travel...(as it is)... geographically isolated from Norwich and major employment locations in comparison with the other major growth locations and.....there is little potential to deliver public transport improvements that will have a realistic chance of encouraging people out of their cars'. The SA finds that growth here is 'undoubtedly a significant negative effect of the strategy and probably the major issue that has been highlighted through this SA'. [In fact, as long ago as 2007 the SA of the Issues and Options report (which identified a wide range of potential geographical locations for growth) concluded (p100) that the town 'is poorly related to strategic employment sites. Even with a bypass, road access and public transport accessibility to Norwich or to the south is poor. This might constrain employment growth in the village. It does not appear to be a suitable location for further investigation for strategic growth at this time'.] The SA accompanying the Issues and Options consultation arrived at comparative scores for all the potential growth locations and accorded Long Stratton a very low score – exceeding only one other location - the south east part of the NPA, which was not proceeded with.]

Despite these findings the JCS SA states that the scale of the growth at Long Stratton (as a proportion of the total) is not such as to 'place in question the overall sustainability of the JCS in terms of achieving sustainable patterns of travel...'. After discussing the proposed growth as the only means of securing a bypass and its associated benefits, the SA finds it 'more difficult to say whether the "local level" benefits associated with growth at Long Stratton outweigh the more "strategic" disbenefits'. It concludes that, irrespective of the answer to that question, there must be focused efforts to mitigate negative effects and recommends that 'there is justification for going further, perhaps by developing a bespoke vision for achieving an ambitious degree of self-containment within Long Stratton'.

The above considerations prompt the question whether or not there is evidence to conclude that the selected distribution of development will support and promote national and regional policy on promoting a culture change from car-reliant transport to more sustainable modes.

Conclusion

In our view there needs to be a much clearer evidence-based explanation and audit trail setting out the reasons why option 2A/the JCS has been considered by GNDP to represent the most appropriate strategy when considered against the reasonable alternatives. Since the SA referred to above [EIP14(1)] presents a negative conclusion on that question, such work would need to focus on clearly-explained and justified reasons why it would now be appropriate to reach a different conclusion from that reached in EIP14(1). Without convincing evidence in this respect there is a continuing risk of the JCS being found unsound in this respect, particularly in relation to Long Stratton.

A particular factor in assessing the appropriateness of the distribution will be clearer evidence about the nature and level of the public transport improvements proposed in the JCS (ie the BRT Corridors and Core Bus Routes), whether or not they will be viable and deliverable, and the timescales for ramping up the improvements. At present it is not fully clear whether the selected distribution of development amongst the various locations provides assurance that the public transport proposals of the JCS can be translated within a reasonable time into a turn-up-and-go-reality or are likely to remain a longer-term aspiration that may have little effect on travel patterns in the short and medium term future.

Attention also needs to be paid to the introduction of sufficiently challenging modal shift targets.

Depending upon the outcome of this work GNDP will need to consider whether changes to the JCS would be necessary to make it 'justified', 'effective' and consistent with national policy' in the above terms.

4 Northern Distributor Road

The JCS states that the proposed Northern Distributor Road (NDR) is fundamental to the delivery of Norwich Area Transportation Strategy (NATS), which has, at its heart, a significant improvement to the bus, cycling and walking network, including Bus Rapid Transit on key routes.

Part of the case for the NDR is its role in providing relief for traffic and congestion, especially in the northern suburbs of Norwich and the villages beyond. This in turn, it is said, would free up road space for public transport (PT) and enable more effective bus penetration into the City's northern suburbs and the major growth sector to the north-east (Old Catton/Sprowston/ Rackheath/Thorpe St Andrew Growth Triangle).

Although part of the NDR (from Postwick to the A140) has achieved Programme Entry Status, the letter from the Department of Transport, dated 08 February 2010, makes it clear that Programme Entry is not a commitment that funding will be provided.

Our concerns

We have two main concerns in terms of the availability of evidence: firstly, we are still of the view that there is an absence of a clear and realistic implementation strategy to ensure that adequate bus provision is provided in line with housing growth and at an early stage in the plan period; and secondly, if the necessary funding for the NDR were not to materialise to the timescale currently expected by GNDP, we consider the JCS unclear about how its proposals would be implemented and subsequent LDDs affected.

Public Transport provision

In relation to sustainable transport, and in particular, enhanced bus provision, there is a danger that, on its own, at least in the early stages of the plan, the NDR could generate increased car dependency. Document T3 (Public Transport Requirements for Growth) states that it will be easier to influence travel behaviour in the new growth locations by providing high quality PT from the outset of development. In our view, this is especially critical in relation to the north-east growth sector of 10,000 new homes.

We wonder about the need for clarification of the JCS to indicate that some sort of mechanism, based on realistic costings, and linked to the phasing of the proposed major housing developments in the north-east growth area, will be developed to ensure timely delivery of appropriate PT penetration to ensure against car dependency and knock-on congestion within north and central Norwich.

In relation to embedding PT provision at an appropriate stage, we acknowledge that there is a dilemma between the 'big bang' approach, whereby fast and frequent PT is in place at the outset (with the obvious funding problems) and waiting for a long period to ensure that sufficient houses are in place to make the PT viable (with the problems of people having got used to using their cars).

In order to address this dilemma, one way forward may be for the JCS to commit to some sort of phased enhancement of PT, in particular increased bus frequencies along the identified corridors in line with increased house numbers, and perhaps a threshold housing target which should not be exceeded until key stages towards a fully developed PT system have been delivered.

While it may not be possible or appropriate for the JCS itself to set out the detail of such a mechanism (although it should clarify the means and processes by which this will be devised), it is important that there is convincing evidence of a realistic prospect that a progressive improvement in PT can be funded and implemented and that significant improvements to PT are not merely a hoped-for outcome. Whatever the mechanism that may be selected, it is critical that the NDR is linked to ambitious modal shift targets. Such targets should not merely relate to the plan area as a whole but allow clear understanding in future of the progress being made along particular individual corridors and in individual development areas.

Uncertainty

PPS12 para 4.10 states that it is important that a core strategy makes proper provision for uncertainty and does not place undue reliance on critical elements of infrastructure whose funding is unknown. At the EM mention was made of an estimated shortfall of around £40 million in relation to the NDR. This must raise concerns about the realism of the proposal. Consideration therefore needs to be given, in the face of this uncertainty, as to how much of the JCS could be delivered without the NDR. Presumably the housing proposals in the area to the south of the NPA would be unaffected. What would happen to employment allocations in and around the north side of Norwich, such as near the Airport? How many of the PT corridors would be jeopardised, including any orbital routes? Would BRT be deliverable?

Conclusion

In our view further work is required to provide clearer evidence about the following matters and the terms of any necessary changes to the JCS:

- the nature and extent of the public transport improvements considered critical to the JCS proposals for the northern part of the City and its associated growth areas;
- the funding of such improvements;

- the possible inclusion in the strategy of reference to the development of thresholds/ trigger mechanisms in relation to progressive stages of development;
- the implications for the JCS of any delay in achieving the NDR both as a partial route to the A140 and along the whole of its proposed length to the A1067;
- suitable modal shift targets for the northern PT corridors in the plan area.

5 Sustainability issues

At the EM we expressed concerns in relation to green infrastructure, energy efficiency and water.

Green Infrastructure

In our note for the EM, we asked whether the green infrastructure concept is sufficiently embedded in the JCS and questioned whether the JCS provides a clear steer for further DPDs. We also expressed concern that some of the DPDs to deliver green infrastructure at a more detailed level are not programmed in the Local Development Scheme (LDS). GNDP stated that they would update the LDS to take on board these points and clarify the incomplete diagram on page 35.

In our view it is necessary for the JCS to set out with greater clarity the purpose and deliverability of green infrastructure within the plan area and the means by which its detailed planning will be taken forward and implemented.

Energy efficiency

As we stated at the EM, the overall message of the Planning Policy Statement 1 Planning and Climate Change (PPS1 supplement) at paras 11 and 31-32 appears to be either to keep to national targets to be expressed through progressive tightening of the Building Regulations or, if appropriate, to propose alternative requirements provided that local circumstances clearly warrant and allow that. It is clearly stated that such requirements should focus on 'development area or site-specific opportunities'.

The relevant local study (ENV5) appears to be somewhat high-level and theoretical and it is unclear whether it establishes that realistic energy generation potential in the area so comparatively exceeds any national norm as to represent a major 'local circumstance' likely to be able to justify such a policy. The study accepts (p2) that the identified technical potential is 'the total resource that is available if all opportunities for renewable energy development are exploited regardless of commercial and institutional considerations'

and that planning constraints, such as landscape, wildlife habitats and grid connection have not been fully considered. It is also unclear whether any of the land assumed to have potential for biomass is currently used for food or other important crops or purposes. Moreover, the study recognises the technical and financial difficulties of achieving zero carbon status across all types of development, especially in smaller scale, lower density and urban/rural infill cases. This would appear to argue against the mandatory nature of the third (and fourth?) bullets of policy 3.

While the scale of development at the major locations identified in the JCS may provide opportunities for the type of 'development area or site-specific' approach referred to in the PPS1 supplement (if other circumstances are right), policy 3 does not clearly address that point or relate to the major locations. Bullets 1 and 2 relate to developments above or below 500 dwellings which is not necessarily the same thing. They also seem to envisage a requirement for a particularly detailed specification of the energy sources and suppliers for all development which may well be a more arduous requirement than the process of development management (in its control and enforcement aspects) can reasonably bear and enforce.

Another area of concern centres on housing delivery. ENV5 goes into some detail on what might be the acceptable costs for developers in achieving zero carbon standards. The study appears to rule out the practicability of zero carbon measures for at least 44% of the new housing (urban and rural infill schemes and some of the smaller expansion areas). Planning Policy Statement 22: Renewable Energy (PPS22) advises that targets should not be framed so as to place an undue burden on developers; this message is reflected in East of England Plan Policy ENG1, which tempers ambition with viability in selecting targets.

If the impact of policy 3 were likely to result in significant viability doubts for certain forms and types of housing, (eg affordable housing on small infill sites that are often in sustainable locations), GNDP may need to consider whether or not changes to the JCS would be necessary to make it 'justified', 'effective' and 'consistent with national policy'.

We conclude that there is a need for GNDP to consider whether policy 3 should be made consistent with national policy, simplified, and made more straightforward to administer.

Water

Our main concerns relate to possible impacts on the quantity and quality of water courses, including the Broads, in relation to water

abstraction and whether the capacity of the waste water treatment infrastructure is likely to be capable of improvement to accommodate the demands that would be progressively placed on it during the plan period. In particular, it would appear that progress in delivering the north-east growth sector would be limited to 4,000 dwellings in advance of the main interceptor sewer.

For the JCS to be effective, the practicability of the improvement measures for the water and sewerage infrastructure, and the availability of adequate sources of funding, needs to be realistically identified and linked to the critical path referred to under section 1 of this letter.

6 The north-east growth triangle

We have 3 main concerns under this heading.

The first is procedural: is it appropriate for the post-submission change re-labelling the growth area a 'strategic allocation' (to be followed up via a Supplementary Planning Document - SPD), rather than a growth 'location' (to be followed up through an Area Action Plan - AAP) to be regarded as a 'minor' one which can be treated as embedded in the submitted strategy? Or is this a change which should be advertised so that members of the public are presented with the opportunity, should they wish to do so, of making representations about the soundness or legal implications of proceeding in that way? In our view this is a change which should be advertised and we ask that this be done.

The second concern relates to whether or not policy 10 gives a fully effective strategic, statutory brief for future planning on the 'what/where/when/how' questions surrounding the planning and effective delivery of the growth triangle, given that some of GNDP's replies to our initial Q19 are not clearly specified or referenced in the JCS itself. In particular, there is no clear description of the way in which a single coordinated approach will be secured to the planning of the 'whole area', particularly the provision of timely, appropriately-located and equitably financed infrastructure. Inferences about some of these matters can be gained from other sections of the JCS but in view of the size of this area, and its centrality to the JCS, some further detail within the policy and its accompanying text seems to be required.

Our third concern relates back to matters raised previously in this letter – ie the evidential soundness behind the JCS references to the public transport infrastructure intended to serve this major development area, eventually accommodating at least 10,000 dwellings. This concern is emphasised by the fact that the first stages are likely to be in a detached (currently rural or semi-rural)

location at the Rackheath Ecotown, an area which will only slowly become a physical part of the wider urban area over a length of time as yet unknown. We would look for convincing evidence that there is a realistic prospect of high quality, regular services being available at an early date.

After the EM we made a general visit to the area of the growth triangle, with particular reference to the Rackheath Ecotown. From this, we have concerns about the JCS references (policy 10 and Appendix 7) to the criticality of a relocated station at Rackheath and a new station at Broadland Business Park. We note from very recent documents such as T4 (January 2010) and EIP2 (March 2010) that there is very little commitment to this as yet. EIP2 states (under the heading Rail Services) that these opportunities will be subject to further feasibility and that delivery would be closely dependent on availability of funding from development and programmes within the rail industry. Considering that a 'key strength' of the Rackheath location was said (in the summary of consultation responses on ecotowns, July 2009, produced by the Department for Communities and Local Government) to be its closeness to an 'existing operational railway with station access' this lack of clarity about the harnessing of that potential is disappointing. As we saw, in mid-morning, Salhouse Station is deserted and uninviting and offers an infrequent service to a very limited number of destinations. It is difficult to see that the presently conceived improvements to the line (at least as far as we have been able to discern them) will make a substantial impact on the daily travelling habits of residents of the ecotown, especially as there is no evidence that they can be delivered within the foreseeable future. We note that T4 states (part 3.4) that 'an innovative tram-style train could be implemented on the Bittern Line, offering 'faster journey times, additional services and improved accessibility' (and also, and importantly, a greater number of intermediate stops). However, there is no evidence that this option has been considered in any depth, despite the success of ventures such as the Manchester and Croydon Trams and the substantial role envisaged for the Cambridge Guided Busway (all using former railway lines). This adds to our concerns, already expressed, about whether or not there is a sufficiently robust and credible evidence base to give us confidence about the effective and timely delivery of a satisfactory public transport system for Rackheath and other parts of the North East growth triangle.

Overall conclusion

It is clear that these comments will require further work by GNDP and may lead to the necessity for changes to be made to the JCS, with consequences for further Sustainability Appraisal and public consultation.

We would ask that you keep the Programme Officer informed of your proposals for this work, and the timetable for it, so that we can consider the implications for our own processes and the fixing of a date for the commencement of hearing sessions. At this point it seems to us unlikely that this could occur before mid October (ie 5 months from now), but any date that we agree with you would of course require consideration of whether or not a formal Pre-Hearing Meeting would be necessary and, of course, statutory advertisement of the Hearings at the appropriate time.

Roy Foster
Mike Fox

Inspectors

24 May 2010

A G E N D A

24 June 2010

at Council Chamber, County Hall

Meeting starts at 2.00pm

Page No

The GNDP officers pre-meeting will take place from 12.30pm until 1.30pm in the Colman Room, County Hall

- 1 To receive declarations of interest under Procedural Rule no 8
- 2 Apologies for absence
- 3 Confirmation of Chairman and appointment of Vice Chairman
- 4 Minutes of meeting held on 27 May 2010
- 5 Economic Development Update
- 6 Joint Core Strategy update
 - JCS Options – The way forward
 - Work programme
 - Infrastructure categorisation
 - North-East triangle concept statement
- 7 **Future meeting dates** 23 September 2010
16 December 2010

Joint Core Strategy : Next steps

Report by the GNDP Directors

Summary

This report considers the implications for the Joint Core Strategy of the Government's intention to scrap the Regional Spatial Strategy. A number of options are discussed. A significant amount of evidence exists to justify the submitted JCS. This evidence would need to be taken into account in developing any alternative approach. It is suggested that the best way forward at this time is to continue with the current JCS on the existing timetable. This would need to be supported by proposing additional minor changes to the Inspectors, to take account of the loss of the RSS, and the production of a topic paper identifying the evidence that supports the housing and jobs targets. This option reduces uncertainty, and is the best able to support economic growth, address housing need and deliver infrastructure. Delay would result in a policy vacuum, which could last for a number of years. Following adoption in 2011, an early review of the JCS under the new planning system will allow further consideration of the ability of the market to deliver the rates of growth and infrastructure required.

Recommendation

GNDP Policy Group recommends constituent authorities to continue with the current Joint Core Strategy with suitable minor changes and supporting evidence.

1. Background

- 1.1. The Government has signalled the intention to rapidly remove regional spatial strategies and in particular the targets for housing provision. The Secretary of State has written to all authorities to inform them that this intention is a material consideration. However, interim arrangements have not been identified, but are expected shortly.
- 1.2. Subsequently, the planning system will be radically reformed "in the longer term".
- 1.3. The Planning Inspectorate has confirmed that the removal of the RSS will be a matter for the public examination.
- 1.4. This report looks at the options for a way forward for the JCS. It concentrates on housing and jobs provision as it is expected that useful RSS policies can be saved.

2. Introduction

- 2.1. At the time of writing the situation is relatively fast moving. The interim arrangements for targets, and the timetable for the implementation of a revised planning system delivering the "localism" agenda, have yet to be specified. However, there are some pointers:

- Significant aspects of law influencing the planning process will continue, such as the SEA Directive which underpins the sustainability appraisal process and requires full consideration of reasonable alternatives;
- Local authorities will be encouraged to work together on sub-regional issues;
- It is expected that the forward planning system will continue to be based firmly on evidence;
- The Conservative green paper suggested that interim targets should be based on the figures put forward by local authorities for the RSS to 2026. Clarification for the interpretation of this aim in relation to the East of England has been sought as the issues are more complex. The housing targets originally put forward for the RSS were to 2021, the subsequently adopted RSS figures to 2026 were accepted by all the local authorities in the area, and revised figures based on the rate of development in the JCS were put forward for the RSS review to 2031 (all conditional on the provision of supporting infrastructure). Any move away from previously accepted RSS targets would need to be clearly evidenced;
- The requirement to demonstrate a 5 year land supply for housing will remain;
- The Government have clearly signalled the intention for the revised planning system to deliver higher rates of housing development not less;
- Localism will be a key element of a revised system but, until the new legislation is introduced, it is unclear how this will operate and be balanced with other imperatives. The distribution of development in the JCS has been largely developed locally.

2.2. Options for the way forward for the JCS at this time are outlined in the attached Appendix 1. The supplementary Appendix 2 indicates the impact on the 5 year land supply. Any course of action not based on continuing with the current process will result in delay with consequent hiatus in local planning policy. This is likely to have a detrimental impact on public and private investment and could leave the area vulnerable to poor quality planning by appeal.

2.3. The delays identified for options 4 and 5 refer to the time taken to gather new evidence and undertake a review under the existing system. However, this process would be likely to be overtaken by the introduction of the new planning system. The likely need to ensure that these changes are incorporated could be expected to add considerably to any delay.

Existing and emerging evidence of need

2.4. There is a range of evidence that supports the need for provision for about 37,000 dwellings as proposed in the submitted JCS. Alternatively this evidence would need to be taken into account in any alternative approach.

2.5. Even with the demise of the RSS the evidence supporting it, including the local authority input will still be material. The existing RSS was supported by a significant evidence base, which is becoming dated but has the benefit of being tested at an EIP. The “banked” RSS roll forward to 2031 is supported by more recent evidence, and is based on local authority proposals, but this has not been tested at a public examination.

- 2.6. The JCS is supported by an assessment of overall housing need (the Greater Norwich Sub-Region Evidence Base for a Housing Market Assessment June 2006). While this is now quite dated and only looked ahead 5 years it demonstrated an overall housing requirement for the GNDP area averaging 1,938 dwellings per annum. If this need is extended over the 18 years of the JCS period it would require the development of around 35,000 dwellings.
- 2.7. There is a very considerable need for affordable housing across the area. In the near future, even more than in the past, it is expected that the principal source of affordable housing will be through agreements on market housing developments. Current JCS policy requires 40% contribution on market sites to address this need. This is recognised to be challenging and it will not be met on all sites. Any reduction in total housing provision will reduce the supply of affordable housing even if a 40% contribution can be delivered, ensuring that affordable housing needs will not be met.
- 2.8. The East of England Forecasting Model (EEFM) is a sophisticated forecasting tool developed and updated by Oxford Economics and overseen by a steering group largely made up of local authority representatives. It is informed by models of the global and national economies. The latest run (Spring 2010) incorporates the most recent data and views on the impact of the recession and recovery. No model can predict the future with absolute accuracy, but the EEFM provides reasonable forecasts and, importantly, links a wide range of indicators including the capacity of the local economy to generate jobs and the housing requirement resulting from economic growth. For the GNDP area for the period 2008-2026 it suggests that the economy will grow to provide around 25,000 additional jobs and this growth will require around 40,000 additional dwellings. This broadly supports the JCS provision of 27,000 jobs and 37,000 dwellings.
- 2.9. The Office for National Statistics has very recently released 2008-based population projections. While these are trend based projections rather than forecasts, they do provide an indication of potential growth pressures. In broad terms these indicate that the population of the GNDP area could be 20,000 higher in 2026 than our previous calculations that are derived from 2006-based projections constrained to JCS housing provision plus a windfall development allowance. While the new projections could be argued to be over-inflated, they are indicative of stronger demand for housing rather than weaker.
- 2.10. Housing pressures come from other demographic changes. For example, occupancy rates across the area continue to fall. While more detailed analysis would be required to understand the likely implication of this, in broad terms falling occupancy rates in the JCS period could be around 0.2 persons per dwelling which would generate a need for around 15,000 dwellings without any increase in population. Further analysis could be undertaken internally to highlight these pressures.
- 2.11. Delivery rates in the period 2001-2009 have averaged just under 1,700 dwellings per annum for the GNDP area. This provides an indication of the market's ability to deliver in a context almost entirely influenced by the housing provision requirements of the previous Local Plans.
- 2.12. All these indications suggest that the current JCS continues to be justified and reasonable.

3. **Other issues**

- 3.1. It is normal practice in any planning system to keep plans under review, and usually roll-forward on a 5 year cycle. If the recommended option to continue on the current JCS timetable is accepted, Members may wish to emphasise that implementation of planned growth and supporting infrastructure will be monitored and managed through the IDP process, and the JCS reviewed accordingly. It might be expected that any process of review would begin within about 12 months of adoption. This would broadly co-incide with the introduction of a new planning system which could then be taken fully into account. A particular issue for review would be to take account of ongoing experience of the ability of the market to deliver the rates of growth currently envisaged and support the required infrastructure. This would allow the consideration of extending currently planned growth over a longer period.
- 3.2. Issues around the 5 year land supply are causing difficulties at present. The existing methodology for assessment places significant weight on developers' intentions. Consequently, during a recession, when site development slows down, the notional land supply is reduced. This is perverse. Members may consider that the new Government should urgently revise previous advice on the methodology for assessing supply to address this. A reasonable approach placing greater emphasis on actual constraints rather than market conditions would improve the position in the GNDP area. (The potential impact of this is not included in Appendix 2).

4. **Resource Implications**

- 4.1. **Finance** : the recommended option can be managed within existing resources. All options with extended timetables will require potentially significant additional resources.

5. **Other Implications**

- 5.1. **Legal Implications** : Primary legislation requires local planning authorities to prepare a Local Development Framework.
- 5.2. **Equality Impact Assessment (EqIA)** : The submitted JCS has been subject to an EqIA.
- 5.3. **Communications** : In accordance with normal practice, a press release will be issued after this meeting
- 5.4. **Any other implications** : Officers have considered all the implications which members should be aware of. Apart from those listed in the report (above), there are no other implications to take into account.

6. **Section 17 – Crime and Disorder Act**

- 6.1. No implications

7. **Risk Implications/Assessment**

- 7.1. All options carry risks. The recommended option minimises these. Options involving further delay increase the risks of additional costs; unplanned and less sustainable development; and failing to meet housing need, facilitate economic growth or attract

infrastructure investment.

8. **Alternative Options**

- 8.1. A range of options are outlined in Appendix 1. Options 1, 3, 4 and 5 are not recommended for the reasons set out in this report and in the Appendices.

9. **Conclusion**

- 9.1. A significant amount of evidence exists to justify the submitted JCS. This evidence would need to be taken into account in developing any alternative approach. The best way forward at this time is to continue with the current JCS on the existing timetable. This would need to be supported by proposing additional minor changes to the Inspectors, to take account of the loss of the RSS, and the production of a topic paper identifying the evidence that supports the housing and jobs targets. This option reduces uncertainty, and is the best able to support economic growth, address housing need and deliver infrastructure. Delay would result in a policy vacuum, which could last for a number of years. Following adoption in 2011, an early review of the JCS under the new planning system will allow further consideration of the ability of the market to deliver the rates of growth and infrastructure required

Recommendation

- (i) GNDP Policy Group recommends constituent authorities to continue with the current Joint Core Strategy with suitable “minor” changes and supporting evidence as set out in this report.

Background Papers

Officer Contact

If you have any questions about matters contained in this paper please get in touch with:

Name **Telephone Number** **Email address**

GNDP Planning Sub
Group contact



If you need this report in large print, audio, Braille, alternative format or in a different language please contact 0344 800 8020 and ask for or textphone 0344 800 8011 and we will do our best to help.

| Option | Issues and Implications | Impact on timetable | Further work | Recommendation |
|--|--|---|---|---|
| 1. Continue with no changes | Not considered a robust approach as it fails to take into account “material consideration” of demise of RSS | Same as present (examination October) | None | <u>Not recommended</u> Pros: requires no extra work Cons: untenable given changes to context |
| 2. Continue with “minor” textual changes to address demise of RSS | a. Proposed changes can be submitted to the Inspector as this will be one of the EIP “matters” b. Continuation of housing and job numbers can be justified from present: <ul style="list-style-type: none"> evidence base for Housing Market Assessment Jobs/Housing Forecasting Model Demographic analysis | Same as present (examination October) | Review of JCS to remove references to RSS Topic Paper to justify validity of housing and job numbers | <u>Recommended option</u> Pros: <ul style="list-style-type: none"> Avoids uncertainty; Best option to support economic growth, address housing need and delivery of infrastructure Cons: <ul style="list-style-type: none"> Does not appease view that growth is not needed |
| 3. Continue as 2 (with same housing numbers), but extend plan period to 2031 | a. Limited direct evidence to support this approach b. Need for further public consultation to test justification c. Would not affect scale of development in each location so limited impact on public concern d. Need to review existing evidence base e. Delay results in some increased risk from uncoordinated development on unallocated sites | Need to withdraw JCS 3-6 months minimum, depending on need for evidence and consequential need to go back a consultation stage | Possible need for new or amended evidence Possible need to return to Reg. 25 consultation stage | <u>Not recommended</u> Pros: <ul style="list-style-type: none"> Eases pressure on 5 year housing land supply More consistent with recent rates of housing completion May ease infrastructure funding issues Cons: <ul style="list-style-type: none"> Prolongs uncertainty with little clear gain Lower rate of development would delay infrastructure delivery Would have a more limited impact on addressing housing need Additional consultation costs |
| 4. Review housing and job numbers and strategy | a. JCS reflects existing evidence on need for housing and jobs b. Need for new/revised evidence, involving significant additional time and costs c. Uncertainty about how to proceed in the absence of government guidance on changes to planning system d. Risks to infrastructure provision e. Uncertainty risks inward investment and economic development f. Significant increased risk from uncoordinated development on unallocated sites | Need to withdraw JCS Possibly up to +2 years | Need for extensive new evidence Need to return to Reg. 25 consultation stage | <u>Not recommended</u> Pros: <ul style="list-style-type: none"> Delay might enable plan to reflect future changes in planning system (though there is no guarantee there will be less growth) Cons: <ul style="list-style-type: none"> Significantly adds to uncertainty and costs May impact on inward investment and funding for infrastructure Prolongs uncertainty |
| 5. Abandon JCS | a. Need for new/revised evidence, involving significant additional time and costs b. Uncertainty about how to proceed in the absence of government guidance on changes to planning system c. Significant risk to infrastructure provision d. Uncertainty and division risks inward investment and economic development e. Loss of economies of scale impacting on authorities’ resources f. Limited ability to facilitate delivery g. Significant increased risk from uncoordinated development on unallocated sites | Need to withdraw JCS Possibly up to +2 years | Need for extensive new evidence Need to return to Reg. 25 consultation stage | <u>Not recommended</u> Pros: <ul style="list-style-type: none"> Delay might enable plan to reflect future changes in planning system (though there is no guarantee there will be less growth) Cons: <ul style="list-style-type: none"> Very significantly adds to uncertainty and costs Least likely to deliver infrastructure and attract inward investment and funding. Lack of co-ordination and overarching strategy could lead to conflict |

| Option | Impact on 5 year land supply issues |
|--|---|
| 1. Continue with no changes | No impact on current shortfall |
| 2. Continue with “minor” textual changes to address demise of RSS | 1. If current practice of measuring based on NPA is retained : No impact on current shortfall 2. If practice is changed to measure on separate districts : <ul style="list-style-type: none"> • Broadland = 1.66 years supply or 2,550 unit shortfall • Norwich = 7.43 years supply or 1,140 unit surplus • South Norfolk= 3.13 years supply or 1,677 unit shortfall |
| 3. Continue as 2 (with same housing numbers), but extend plan period to 2031 | 1. If current practice of measuring based on NPA is retained : Some reduction of current shortfall= 4.56 years supply or 631 unit shortfall 2. If practice is changed to measure on separate districts : <ul style="list-style-type: none"> • Broadland = 2.08 years supply or 1,780 unit shortfall • Norwich = 10.62 years supply or 1,845 unit surplus • South Norfolk= 4.21 years supply or 667 unit shortfall |
| 3. Review housing and job numbers and strategy | Uncertain impact (NB situation could be worse given stated commitment to deliver higher rates of development). |
| 4. Abandon JCS and GNDP | Uncertain impact (NB situation could be worse given stated commitment to deliver higher rates of development). |

NB. 250 units at Norwich Common (Wymondham) have not been added to supply and can be discounted of NPA/SNC shortfalls

**Joint Core Strategy :
Preparation for the Examination in Public
Work Programme**

Report by the GNDP Directors

Summary

This report gives the GNDP Policy Group a high level summary of the work programme that has been put together to address the Inspector's concerns following the Exploratory Meeting held on 13 May 2010. It follows on from the recommendations agreed by the GNDP Policy Group meeting on 27 May 2010.

Members are asked to agree the briefs covering the six areas of work including progress to date. Members are also asked to approve the consultation process and consider the most efficient way of giving approval and formal sign-off for the consultation if required due to the tight timetable.

Recommendation

- (i) Agree the six briefs setting out the work required before the hearing
- (ii) Agree the consultation brief and sign-off requirements and or agree additional meetings required for formal sign-off

1. Background

- 1.1. This report contains the individual briefs for each of the six concerns highlighted by the Inspector following the Exploratory Meeting held on 13 May 2010. The briefs demonstrate that the work can be completed in time for end of October start date for the hearings as suggested by the Inspector.

2. JCS Work Programme for completion before the hearings

- 2.1. A reply to the Inspector's letter was been submitted to him on 7 June making him aware of the GNDP's wish to proceed with the hearings at the end of October. The letter sent to the Inspector has been published on the GNDP website. On 11 June the Inspector confirmed that a start date of 25 October for the hearings is acceptable.

2.2. The briefs setting out the work programme

There were six main headings of concern identified in the Inspectors report :

- 1. Infrastructure

2. Affordable Housing
3. The distribution of development , particularly in relation to public transport opportunities
4. Northern Distributor Road
5. Sustainability issues, Green Infrastructure, Energy and Water
6. The north-east growth triangle

A brief setting out the work and timetable for any consultation has also been drafted and agreed with GO-East.

- 2.3. There is a significant amount of work to be completed before the hearings, some of which is likely to require further consultation. The attached six briefs set out the additional work required and give an idea of the activities and associated timetable.

- 2.4. **Progress to date**

- 2.5. **1. Infrastructure categorisation**

This work is progressing as planned, the initial activity is to review Appendix 7 and re-categorise the items in the tables as requested by the Inspector. A progress report on this first piece of work will be presented as a separate item on the agenda.

- 2. Affordable Housing**

As stated in 27 May 2010 JCS update the most time consuming piece of work is the Affordable Housing Study. This is because if the study suggests a change to the wording of the Affordable Housing Policy this will require 'focussed consultation' to take place.

The work is progressing in line with the timetable, the Affordable Housing Study has been commissioned from Drivers Jonas and will be completed by 9 July (earlier if possible).

- 3. The distribution of development, particularly in relation to Long Stratton and public transport**

The work is progressing as planned and will be completed as required.

- 4. Northern Distributor Road**

The work is progressing as planned and will be completed as required

- 5. Sustainability issues, Green Infrastructure, Energy and Water**

The work is progressing as planned and will be completed as required

- 6. The north east triangle**

Additional work IS required to secure the status of the growth triangle as a strategic allocation in the Joint Core Strategy. The approach is to provide an additional appendix in the form of a "concept statement" setting out further details of how development in the growth triangle is expected to take place.

Separate item on the agenda.

Consultation

An additional brief is attached showing the activities required for the focussed consultation, if required, and the sign-off requirements for each authority.

3. **Resource Implications**

3.1 **Finance :**

The only financial implications for completion of this work is for the Affordable Housing Study being carried out by Drivers Jonas, this cost of the study will be met from the Growth Point Funding budget for 2010\11.

3.2 **Staff :**

The additional work will be carried out by the GNDP implementation Unit and the GNDP Planning sub-group with additional support from the authorities as required.

4 **Risk Implications/Assessment**

4.1 The risk of not completing the work to the Inspectors satisfaction is that the JCS could be further delayed by the Inspector.

5 **Conclusion**

5.1 The briefs attached to this report demonstrate that the JCS timetable can be met. The GNDP Implementation Unit and the Planning sub-group will carry out the work required to meet the timetable, the GNDP Directors and the GNDP Policy Group will be kept informed on progress.

Recommendation

- (i) Agree the six briefs setting out the work required before the hearing
- (ii) Agree the consultation brief and the sign-off requirements

Background Papers

Inspector's Conclusions following the Exploratory Meeting held 13 May 2010

Officer Contact

If you have any questions about matters contained in this paper please get in touch with:

| Name | Telephone Number | Email address |
|-----------------|-------------------------|------------------------|
| Sandra Eastaugh | 01603 638302 | s.eastaugh@gndp.org.uk |

Greater Norwich Development Partnership (GNDP)

1. Infrastructure

1. Requirement following the Exploratory Meeting

- 1.1 The Inspectors notes of the Exploratory Meeting held on 13 May identified further work the Partnership needs to undertake around delivery of infrastructure in the Joint Core Strategy, extract below:
- 1.2 The Planning Inspectorate (PINS) document 'Examining DPDs: Learning from Experience' refers to important soundness-related matters on this topic (p7-8).
- 1.3 We drew attention (in our original Q1-2) to the **categorisation** in Joint Core Strategy (JCS) Appendix 7 of 80 infrastructure items as 'critical', either to the JCS as a whole or to certain parts of it. Identification of all these items as 'critical' could pose the risk of the JCS (or certain parts of it) being found unsound if the examination were to throw doubt on the timely delivery of any of these items. Para 26 of the PINS advice makes it clear that it is unhelpful to include reference to an infrastructure project if such reference is effectively a tactical means of adding weight to the case for a project which the provider is unlikely to be able to fund or support within the relevant timescale.
- 1.4 The PINS advice recognises the role that a complementary 'live' document such as Greater Norwich Development Partnership's (GNDP) proposed **Integrated Development Programme** (IDP) can play in setting out the detailed steps necessary to realise the proposals of a Development Plan Document (DPD). It will be useful if the first version of this is available for the hearings. However, as the advice states (para 27), the key infrastructure items required to enable delivery of the major developments in the DPD need to be firmly and clearly identified in the DPD itself and their implementation shown to be reasonably assured.
- 1.5 Firmer evidence would be available about the major development-related elements of the JCS if '**critical path**' evidence were to be prepared setting out the links between each of the key housing growth areas (in the table at p12 of the relevant topic paper - TP8) and the infrastructure necessary for their completion within the timescale of the housing trajectory indicated on p13 of TP8.
- 1.6 It would be helpful if the critical path can be augmented by brief information about the providers and funders in the case of each piece of infrastructure, together with information drawn from the evidence base about the degree of **sign-up of the providers** (see PINS advice para 22). It was somewhat concerning that GNDP seemed to take the view that service providers cannot confirm their intentions until the JCS is 'in place'. This is not the way

that Planning Policy Statement 2: Local Spatial Planning (PPS12) or the PINS advice considers ‘effectiveness’. Proposals in DPDs are unlikely to prove sound if the relevant providers have not indicated that there is a reasonable prospect that linked infrastructure can be completed on time.

- 1.7 It would also be helpful if the critical path can identify **which infrastructure projects are truly ‘critical’** and which may be of lesser importance but still desirable, since we have found that the evidence base can convey mixed messages about (a) the degree of criticality of certain infrastructure projects (i.e. to extent to which they represent a fundamental constraint on the commencement of development) and (b) the likelihood of their delivery within the necessary timescales.
- 1.8 [We recognise that the infrastructure needs of the major development locations do not stand entirely alone but have to be considered alongside the needs generated by committed or anticipated development within the main urban area and the ‘other sites’ to be allocated in Broadland and South Norfolk, and that assumptions about these other sites have to be built into the critical paths. It will therefore be important to include some clear information about those assumptions in this exercise.]
- 1.9 Brief summary of the response given to the Inspector at the EM:
 1. The use of the term ‘critical’ did not relate to the definition in the Infrastructure Needs and Funding Study (INF1) – the GNDP recognised that the tables could be clarified and volunteered to re-visit the list making it clear what the dependencies are and their categorisation.
 2. The IDP is work-in-progress, a copy will be available at the hearings, it will be signed off by GNDP Policy Group
 3. An Engagement Strategy has been agreed and meetings with Service Providers are booked to discuss delivery.
 4. The IDP will be reviewed 6-monthly
2. **Work Programme for completion before the hearings**
 - 2.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.
 - 2.2 PINS Guidance -The Inspector referred (in 1.2) to the Planning Inspectorate (PINS) document ‘Examining DPDs: Learning from Experience’ (p7-8). The guidance accepts that,

“the amount of detail that it is possible to supply is likely to be less certain and comprehensive for the later stages of the plan period...for the first five years of the plan it should be clear what infrastructure is required, who is going to find and provide it and how it is going to relate to the rate of development...”

“Clearly many planning authorities are finding it difficult to effectively engage with the infrastructure providers. In some instances there appears to be very little that a planning authority can do about this...the Inspector will take a realistic view about what the council can provide so long as the council has made all reasonable attempts to engage with the infrastructure provider in question. Councils who face these sort of difficulties should provide, in the evidence base, details of what steps they have taken and what assumptions have been made in response to the difficulties...”

The guidance notes confirm that there could be a number of uncertainties that have to be taken into account by the Inspector.

- 2.3 **Categorisation** - a review of Appendix 7 in the JCS will be undertaken, removing the use of the word ‘critical’. The list of infrastructure will be categorised priority 1, 2 and 3 with a clear definition of each priority. The list of infrastructure will be aligned with the housing trajectory to show the dependencies and phasing associated with the major developments.

Output 1: revised tables in the IDP showing priority 1, 2 and 3 infrastructure in the short, medium and long-term in line with the housing trajectories.

- 2.4 **IDP** – A well-developed version of the IDP will be provided as additional evidence for the hearings, signed off by GNDP Policy Group

Output 2: signed-off version of IDP

- 2.5 **Critical path** – the above categorisation will provide sufficient information to prepare a critical path. Identifying risks and constraints that can be included in the JCS

Output 3: illustrate the critical path as identified in 1.7 of the Inspector’s conclusions.

To be consulted on as additional minor change to the Joint Core Strategy.

- 2.6 **Sign-up by providers -**

As stated in the GNDP Response to Inspectors questions 9 April 2010

“Engagement with key service providers is continuing through the development of the IDP.

An Engagement Strategy has been agreed with the GNDP Leaders and is being implemented. The County Council is a key provider of strategic infrastructure and is part of the GNDP. The County Council has been fully involved with the production and approval processes of both the JCS and

IDP. A draft of the IDP document will be available to the Inspectors prior to the examination”

Output 4: Provide the Inspector with a statement that sets out the evidence that the key infrastructure providers signed up to INF1

Provide a timetable of meetings, agendas and action notes for each of the key infrastructure providers that are taking place over next 5 months

Supply the Inspector with position statements from the key infrastructure providers for the October hearings

2.7 **Projects linked to this work**

Development of a charging schedule for a CIL or tariff including an economic viability study

3. Outputs summary, resources and timetable

| | Output | Who | By when |
|----|---|---|--|
| 1. | Categorisation IDP tables showing priority 1, 2 and 3 infrastructure in the short, medium and long-term. | Ruth Charles, Sandra Eastaugh, Phil Morris, Richard Doleman | 17 June 2010 |
| 2. | Integrated Development Programme IDP version 1 | Ruth Charles, Sandra Eastaugh, PSG, IDP sub-group | 27 August 2010 |
| 3. | Critical Path for inclusion in JCS Illustrate the critical path as identified in output 1. To be consulted on as additional minor change to the Joint Core Strategy. | Phil Morris, Richard Doleman, Sandra Eastaugh, Ruth Charles | 17 June 2010 July – Sept 2010 |
| 4. | Sign-up by providers Statement showing how key infrastructure providers have signed up to INF1 Collate timetable of meetings, agendas and action notes Obtain position statements from key infrastructure providers | Ruth Charles Amy Baxter Sandra Eastaugh\Richard Doleman | 17 June 2010 17 June 2010 27 August 2010 |
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Greater Norwich Development Partnership (GNDP)

2. Affordable Housing

1.0 Requirement following the Exploratory Meeting

- 1.1 The Inspector's notes of the Exploratory Meeting held on 13 May identified further work the Partnership needs to undertake around Affordable Housing in the Joint Core Strategy. The inspector asked for a Housing Assessor to be appointed for 3 days to provide specialist support on the Affordable Housing Policy, Mr Nigel Jones was appointed and provided a report to the Inspector. The conclusions from the Inspector's report are set out below:
- 1.2 Planning Policy Statement 3 Housing (PPS3) para 29 states that Local Development Documents (LDDs) should set out the range of circumstances in which AH will be required in terms of both thresholds and proportions. It also requires an informed assessment of the economic viability of such proposed thresholds and proportions. At the EM we indicated our concern that the economic viability testing in documents H5 and INF1 may not be fully robust and credible.
- 1.3 **Additional factors** - PPS3 para 29 requires that LDDs should **set an overall** (ie plan-wide) **target** for the amount of AH to be provided. It is not clear that such a numerical target for the plan period has been devised, taking account of committed housing developments with existing planning permission and developments on sites below the proposed JCS site size threshold. Without such an overall target it may be more difficult to monitor the success or otherwise of the policy. [On a related matter, it would also be helpful to the understanding of the JCS if it gave some perspective on the number of units expected to result from the rural exceptions schemes clause of policy 4.]
- 1.4 PPS3 para 29 also indicates that LDDs should **set separate targets for social rented and intermediate AH** where appropriate; specify the size and type of AH likely to be needed in particular locations; and set out the approach to developer contributions. The JCS appears to indicate that other LDDs will fulfil some of these functions, but greater specificity on this point would be helpful to the clarity of the JCS.
- 1.5 It appears that further work is required to take account of the above points. It is not for us to specify the precise methodology of such work, but in our view it should provide a more **transparent assessment of the realistic capacity of the market to deliver AH** in association with much higher infrastructure contributions and code standards. Factors that need to be considered and tested are:
 - Strong and weak market scenarios;

- The margin required between existing/alternative use value and residual land value in order to incentivise landowners to bring their land to the market (establishing a clear measure, based on local evidence);
 - A selection of S106/tariff/Code for Sustainable Homes assumptions, ranging from those secured in the H5 study up to the levels implied by the INF1 study;
 - The viability within the immediately foreseeable future of a range of proportions of AH below and up to 40% (with the potential for review if circumstances change further into the plan period);
 - Any potential for different proportions of AH to be sought in different geographical locations or development areas if the work indicates significant variations in land values and development costs across different parts of the JCS area.
 - Some overt testing of the proposed reduced site size threshold of 5 units.
- 1.6 In addition, normal reliance should not be placed on **grant availability** (albeit recognising that this could, in some circumstances, be an exceptional factor bringing viability to a limited number of otherwise unviable schemes).
- 1.7 Following this work, consideration will need to be given to the nature of any changes that may be needed to make the JCS sound in relation to AH. {Within this exercise account will also need to be taken of the 'additional factors' referred to above]
- 1.8 Brief summary of the response given to the Inspector at the EM:
1. The Partnership is not in a position to respond to the assessors report given the late receipt of the report.
 2. The partnership requires a clear brief in order to undertake further work. In the absence of guidance the Partnership would request clear guidance from the Inspectors as to the nature of the study that would meet the requirements of PPS3, Blyth Valley and the CIL regulations.
 3. If the Inspector wants something that addresses the requirements of PPS3 we could have something relatively quickly but we would have concerns that this would have to be undertaken in the absence of certainty about future CIL or tariff levels.
- 2.0 **Work Programme for completion before the hearings**
- 2.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.
- 2.2 **Affordable Housing targets** – calculate the number of dwellings required for the plan period in order to set a target for the amount of AH to be provided. Consider the number of units that are expected to result from the rural exceptions schemes. Add clarity to the JCS to set a target for the number of units required for socially rented and intermediate AH where appropriate.

- Output 1:** Calculate the housing targets as suggested by the Inspector to meet the requirements of 1.3 and 1.4 above. An additional paragraph of numerical and supporting text in the JCS
- 2.3 **Affordable Housing Study** – to meet the requirements of PPS3 and the concerns set out in 1.5 and 1.6 above. A brief for the study has been issued to Drivers Jonas Deloitte (as they carried out the earlier study work).
- Output 2:** AH Study to meet the requirements of PPS3 and address the Inspector's concerns.
- Output 3:** Analysis of the report, paper to Directors, revision of JCS Policy
- 2.4 **Consultation** – 6 weeks to persons who made representations at Reg 27 and those asking to be notified (approx 170) plus advertisements
- Output 4:** Following minimum 6 week consultation, analysis of responses resulting in paper to Directors and GNDP Policy group for sign-off
- 2.5 **Projects linked to this work**
Feed into the IDP work especially development of a charging schedule for a CIL or tariff including an economic viability study.
- .

3.0 Outputs summary, resources and timetable

| | Output | Who | By when |
|----|--|--|---|
| 1. | Affordable Housing targets Calculate the numerical housing targets to incorporate in the JCS | Roger Burroughs, PSG | 17 June 2010 |
| 2. | Affordable Housing Study <ul style="list-style-type: none"> Project Brief submitted to Drivers Jonas on 1 June 2010 Proposal, Project Plan including resources from Drivers Jonas 4 June Procurement complete by 4 June Inception Meeting with GNDP team by 11 June 2010 (ideally 9 June 2010) Drivers Jonas carries out the study from 4 June to 2 July Drafted report to be submitted to GNDP for comment by 2 July City Council Exec sign off Final report submitted to GNDP by 9 July | Lead: Roger Burroughs PM Support: Helen Lambert | 2 July 7 July 9 July |
| 3. | Amend JCS AH Policy Use finding of the Study to re-draft the AH Policy in JCS Prepare paper to Directors for agreement to consult | Roger Burroughs | 9 July 2010 |
| 4. | Consultation process 6 weeks consultation on revised AH Policy and numerical text to be added to JSC Adverts and letters | Ruth Chales, Helen Lambert, Amy Baxter, Helen Bartlett | 19 July – 30 August 2010 10 September 2010 |

| | | | |
|--|--|--|-------------------|
| | Analysis of responses and report to Directors and Policy group | | 23 September 2010 |
| | Full Council sign-off: | | |
| | - Broadland | | 28 September 2010 |
| | - Norfolk | | 27 September 2010 |
| | - Norwich | | 28 September 2010 |
| | - South Norfolk | | 20 September 2010 |

Greater Norwich Development Partnership (GNDP)

3. The distribution of development, particularly in relation to public transport opportunities

1.0 Requirement following the Exploratory Meeting

- 1.1 The Inspectors notes of the Exploratory Meeting held on 13 May identified further work the Partnership needs to undertake. The main points from the Inspector's conclusions reached by the Inspectors are set out below:
- 1.2 A clear **evidence-based explanation and audit trail for Option 2A** – why is it most appropriate strategy compared to reasonable alternatives? – why was it chosen contrary to the SA (ref: EIP14(1)) conclusions?
- 1.3 Clearer evidence about the nature and level of JCS proposed **public transport improvements**, their viability, deliverability and timescales – Does the development distribution provide for improvements (including turn-up-and-go services) in a reasonable time rather than become long term aspirations with little effect on short-medium term travel patterns?
- 1.4 Sufficiently challenging modal shift targets.(Will evidence conclude that the growth distribution can support and promote a culture change from car reliance to sustainable transport?)

Inspector's comments taken from text

- Option 2A is effectively the same as the JCS.
- Pre-engagement Inspector: lack of evidence to support Option 2A
- SA for Reg 25 consultation (Ref. EIP14) - compares Options 1,2,3 and 2A, but 2A had the worst medium term assessment.
- Suitability re meeting RSS Policy NR1 objective to “achieve a major shift in emphasis across the NPA to travel by public transport, walking and cycling”? (while reflecting PPG13 Transport para 6 to actively manage urban growth to make the fullest use of public transport and locate housing where highly accessible by non-car transport modes?)
- Large scale growth should allow for SMART modal shift targets.
- SA of JCS (Ref: JCS3): South Norfolk difficulties in achieving a high degree of self-containment and providing attractive public transport; A11 growth corridor uncertainties re BRT deliverability and viability; para 2.2.57, no SN growth areas could support turn-up-and –go buses, even by 2021
- Long Stratton soundness concerns – SA of JCS – less suited to encouraging sustainable travel; less accessible to Norwich and major employment locations; proposed growth undoubtedly a significant negative effect on the strategy – SA of “Issues and Options” – conclusions negative re access even with bypass; concluded not a suitable location for investigations for strategic growth.
- SA of JCS states growth small % of whole so therefore has a small impact on overall sustainable travel; but JCS SA cannot say local level

benefits outweigh strategic disbenefits; response is to focus on mitigation measures and to develop “a bespoke vision for achieving an ambitious degree of self containment within Long Stratton”

- Depending upon the outcome of this work GNDP will need to consider whether changes to the JCS would be necessary to make it ‘justified’, ‘effective’ and consistent with national policy’ in the above terms.

1.5 Brief summary of the response given to the Inspector at the EM:

1. The Sustainability Appraisal shows that all locations, including Long Stratton, are very good in principle for providing cycling and walking opportunities to work and services. All locations are on proposed corridors that are identified for public transport enhancement.
2. Paragraph 6.13, page 66 of the JCS notes that, ‘While Long Stratton is not as well related to employment or high quality public transport, this is outweighed by the availability of a good range of local jobs, services and other community facilities and the significant local benefits of a development-led bypass. To ameliorate the impact of more limited opportunities for non-car trips to specific locations and other facilities in Norwich, it will be particularly important to take a ‘whole-settlement’ approach to the development of Long Stratton to maximise the number of trips on foot, or by cycle’.
3. Current timetables show Long Stratton is served by a dedicated half – hourly service Monday – Saturdays 7am – 7pm. It is also served by through services. Long Stratton proposals include enhancement to bus journey time reliability on the route into Norwich.
4. Bus Rapid Transport is the end result of continuous improvement to bus routes and corridors, these improvements will happen over a period of time. Measures can be introduced on corridors to enhance public transport services and build towards bus rapid transit.
5. How the opportunities to enhance public transport, walking and cycling are developed depends on how the NATS is implemented – the NATS Implementation Plan is still in development – the role of NATS will be to maximise public transport, walking and cycling opportunities in growth locations.
6. The JCS aims to have growth locations served by high quality public transport and the locations selected have the potential for this.

2.0 **Work Programme for completion before the hearings**

- 2.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.

- 2.2 **Sustainability Appraisal and selection of locations, including Long Stratton, as locations for growth** - Clarify the audit trail from Option 1 at Issues and Options stage through to option 2+ which became the ‘favoured option’. At the hearing we agreed to provide the Inspector with a table that clearly sets out the SA results and the reasoning to select the ‘favoured

option' (note: this is not 2A as referred to by the Inspector in his conclusions).

Output 1: Review the Topic Paper that sets out the stages to agree the major growth locations as in the 'favoured option' and clarify how the decisions link together and can be traced back to Option 1

Output 2: Prepare a table setting out the SA work, clearly explaining what SA said and the mitigations, especially for Long Stratton

Output 3: Point the Inspector to the evidence that supports the long-term 'vision' for Long Stratton and the degree of self containment within it

2.3 **Public Transport Improvements and modal shift targets**– supply the Inspector with a copy of the document that sets out the definition Bus Rapid Transport, bus improvements etc. Clarify para 2.2.59 of the SA in relation to the borderline comment re Wymondham, Hethersett and Cringleford. Show how NATS incorporates public transport improvements, and set out the steps that will be taken to monitor NATS implementation. (*Transport Strategy meeting taking place on 10 June to discuss and identify work required – update after meeting*)

Output 4: Supply BRT paper (Already exists)

Output 5: Clarify SA re A11 corridor 'borderline' comment

Output 6: Signpost the Inspector to evidence that already exists to support the public transport improvements

Output 7: Paper setting out how the NATS implementation plan incorporates public transport improvements and walking and cycling opportunities. Paper to also set out the mechanism for a producing a baseline for public usage and the derivation of mode shift targets and the mechanism for a monitoring regime

2.4 **Projects linked to this work**

Feed into the IDP work especially the short, medium and long targets

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3.0 Outputs summary, resources and timetable

| | Output | Who | By when |
|----|--|---|--|
| 1. | Review Topic Paper TP8 and clarify how the decisions link together and can be traced back to Option 1 | Dave Willis | 30 June 2010 |
| 2. | SA Table clearly explaining what SA said and the mitigations, especially for Long Stratton | PSG Dave Willis focus on Long Stratton | 16 July 2010 |
| 3. | Long Stratton 'vision' - Point the Inspector to the evidence that supports the long-term 'vision' for Long Stratton and the degree of self containment within it | Dave Willis | 16 July 2010 |
| 4. | Supply BRT paper - supplied by Jeremy Wiggen | Amy Baxter add to evidence | 30 June 2010 |
| 5. | Public Transport Improvements - evidence <ul style="list-style-type: none"> Clarify SA re A11 corridor 'borderline' comment Signpost the Inspector to evidence that already exists to support the public transport improvements Paper setting out how the NATS implementation plan incorporates public transport improvements and walking and cycling opportunities. Paper to also set out the mechanism modal shift targets <i>(work to be agreed with Transport Strategy Team 10 June meeting)</i> | Mike Payne David Allfrey Richard Doleman, Transport Strategy Richard Doleman, Transport Strategy | 16 July 2010 Draft 19 July 27 August 2010 Draft 19 July 27 August 2010 |
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Greater Norwich Development Partnership (GNDP)

4. Northern Distributor Road (NDR)

1. Requirement following the Exploratory Meeting

- 1.1 The Inspectors notes of the Exploratory Meeting held on 13 May identified further work the Partnership needs to undertake around the role of the NDR. The Inspector set out two main concerns in terms of the availability of evidence
- 1.2 Firstly, we are still of the view that there is an absence of a clear and realistic implementation strategy to ensure that adequate bus provision is provided in line with housing growth and at an early stage in the plan period; and secondly, if the necessary funding for the NDR were not to materialise to the timescale currently expected by GNDP, we consider the JCS unclear about how its proposals would be implemented and subsequent LDDs affected.
- 1.3 The Inspectors conclusions state - In our view further work is required to provide clearer evidence about the following matters and the terms of any necessary changes to the JCS:
- the nature and extent of the **public transport improvements** considered critical to the JCS proposals for the northern part of the City and its associated growth areas;
 - the **funding of such improvements**;
 - the possible inclusion in the strategy of reference to the development of **thresholds/ trigger mechanisms** in relation to progressive stages of development;
 - the implications for the JCS of any **delay in achieving the NDR** both as a partial route to the A140 and along the whole of its proposed length to the A1067;
 - suitable **modal shift targets** for the northern PT corridors in the plan area.
- 1.3 The Inspector also raised concerns about uncertainty, extract from the report below:
PPS12 para 4.10 states that it is important that a core strategy makes proper provision for uncertainty and does not place undue reliance on critical elements of infrastructure whose funding is unknown. At the EM mention was made of an estimated shortfall of around £40 million in relation to the NDR. This must raise concerns about the realism of the proposal. Consideration therefore needs to be given, in the face of this uncertainty, as to **how much of the JCS could be delivered without the NDR**. Presumably the housing proposals in the area to the south of the NPA would be unaffected. What would happen to employment allocations in and around the north side of Norwich, such as near the Airport? How many of

the PT corridors would be jeopardised, including any orbital routes? Would BRT be deliverable?

1.4 Brief summary of the response given to the Inspector at the EM:

1. The NDR is part of the Norwich Area Transportation Strategy (NATS) and will:
 - Reduce congestion on strategic routes to the north of the city
 - Reduce noise, air pollution and accidents for communities in the northern suburbs of Norwich and villages outside
 - Enable removal of through traffic from the city centre and implementation of widespread pedestrian / bus priority measures.
 - Provide direct access to growth locations, helping to deliver significant housing and employment growth
 - Support the continued success of the Norwich economy.
2. The NDR will be connected to the national trunk road network at the A47 at Postwick and improves access to Norwich International Airport as well as key existing and proposed housing and employment sites. As a part of NATS, the NDR provides the potential for modal shift to more sustainable forms of transport.
3. The NDR will:
 - Remove traffic in the northern suburbs of Norwich along roads that are residential in nature and not suited to high traffic levels
 - Provide the conditions for restricting through traffic enabling the introduction of further bus priority, walking and cycling measures
4. The NDR is part of a NATS Implementation Plan that includes significant enhancements to walking and cycling and public transport improvements ranging from small scale measures up to the provision of full Bus Rapid Transit (BRT) along key radial routes into Norwich. The modelling evidence shows that the NDR will provide traffic relief across the city centre. The reduction in traffics will allow the introduction of significant improvements to public transport, walking and cycling.
5. Introduction of public transport, walking and cycling measures will reinforce the function of the NDR to remove through traffic pressures from unsuitable areas of the network like the northern suburbs and the city centre.
6. Existing transport corridors in Norwich that have extensive bus priority measures are shown to perform significantly better in terms of bus service punctuality than corridors that lack bus priority. The NDR gives traffic reductions on key routes and provides the conditions for bus priority measures to be provided on more corridors.

2. **Work Programme for completion before the hearings**

- 2.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.

- 2.2 **Public Transport Improvements** – this is directly linked to the concerns raised for the work under ‘distribution of development, particularly in relation to public transport opportunities’. We will not duplicate the work but the Inspector does raise concerns about the northern part of the city and the growth area and evidence that there will be suitable public transport in place alongside the development to encourage the use of public transport.
- Output 1:** NATS Implementation plan to expand on elements relating to the north east part of the city. NATS needs to give assurance on programme of work, phasing, indicate what will be the trigger to the public transport improvements starting
- Output 2:** Funding of Public Transport schemes - this will be covered in the housing trajectory and priority tables in the IDP that set out priorities, timetable and funding.
- Output 3:** An evidence based report showing the opportunities provided by the NDR to increase public transport improvements, showing what these may be and how they contribute to enhanced bus provision – (what can be delivered pre and post NDR).
- 2.3 **Phasing in north-east pre and post NDR** – Supply the Inspector with information about the process following Programme Entry Status. Direct the Inspector to evidence in the supporting documents already supplied relating to public transport improvements. Supply information on what can be delivered in the north-east pre NDR and what follows including interventions and public transport plans. Also provide the Inspector with any new documents that give confidence on funding of NDR and Postwick hub.
- Output 4:** Critical path for delivery of housing in north-east showing how development is linked to NDR delivery, provide a timetable showing trigger points. Critical path to also show how any delay will affect housing trajectory
- 2.4 **Modal Shift targets** – linked to the north east in particular. Direct the Inspector to evidence that already exists, BRT work taking place on Newmarket Road, Dereham Road, and planned work for Salhouse Road. Provide evidence of Smarter Choice Travel Plans that already exists to demonstrate that improvements to public transport are already happening and will continue.
- Output 5:** Signpost the Inspector to evidence that will clarify the intention to deliver public transport improvements and provide an update on public transport improvements already planned or completed to date.
- 2.5 **Projects linked to this work**
Development of a charging schedule for a CIL or tariff including an economic viability study

3. **Outputs summary, resources and timetable**

| | Output | Who | By when |
|----|--|---|---------------------------------|
| 1. | NATS Implementation plan to expand on elements relating to the north east part of the city. NATS needs to give assurance on programme of work, phasing, indicate what will be the trigger to the public transport improvements starting | Richard Doleman, Ann Carruthers, Transport Strategy team | 19 July 2010 |
| 2. | Funding of Public Transport schemes – picked up in IDP | Ruth Charles, Sandra Eastaugh, PSG, IDP sub-group | 19 July draft 27 August 2010 |
| 3. | An evidence based report showing the opportunities provided by the NDR to increase public transport improvements, (what can be delivered pre and post NDR) | Richard Doleman to liaise with David Allfrey and NDR team | 19 July draft 27 August 2010 |
| 4. | Critical path for delivery of housing in north-east showing how development is linked to NDR delivery, provide a timetable showing trigger points. | Richard Doleman to liaise with David Allfrey and NDR team | 19 July draft 27 August 2010 |
| 5 | Signpost to evidence -to clarify the intention to deliver public transport improvements and provide an update on public transport improvements already planned or completed to date. | Richard Doleman to liaise with David Allfrey and NDR team | 19 July |
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Greater Norwich Development Partnership (GNDP)

5. Sustainability Issues – Green Infrastructure

1. Requirement following the Exploratory Meeting

- 1.1 The Inspectors notes of the Exploratory Meeting held on 13 May identified further work the Partnership needs to undertake to address their concerns in relation to green infrastructure, energy efficiency and water.

1.2 **Green Infrastructure** concerns, extract from the Inspectors note:

In our note for the EM, we asked whether the green infrastructure concept is sufficiently embedded in the JCS and questioned whether the JCS provides a **clear steer for further DPDs**. We also expressed concern that some of the DPDs to deliver green infrastructure at a more detailed level are not programmed in the Local Development Scheme (LDS). GNDP stated that they would **update the LDS** to take on board these points and clarify the **incomplete diagram on page 35**.

In our view it is necessary for the JCS to set out with greater clarity the purpose and deliverability of green infrastructure within the plan area and the means by which its detailed planning will be taken forward and implemented.

1.3 Brief summary of the response given to the Inspector at the EM:

1. The team assured the Inspector that there was every intention to include green infrastructure within the Site specific DPDs. The DPDs that follow the JCS will integrate green infrastructure and will have to be consistent with the JCS. Districts agreed to update the LDS where required.
2. The Green Infrastructure Study ENV 6 – a draft strategy - forms part of the evidence base for the JCS. ENV 2 - The Green Infrastructure Delivery plan moves the study forward.

2. Work Programme for completion before the hearings

- 2.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.

- 2.2 **DPDs:** Produce a table\diagram that sets out what daughter documents will be produced following the JCS. Each district to ensure their LDS is up-to-date and include info in the table. **GI Draft Strategy** – review status of the draft document and clarify its status for following DPDs.

- 2.3 **Replace Diagram** on page 35 of JCS– Already logged as a minor change as the legend is missing. regularly

- Output 1:** Produce table\diagram of documents to follow JCS for each district
- Output 2:** Check LDS for each district and update where required.
- Output 3:** Replace diagram on page 35 of LDS (already done)

2.4 **Projects linked to this work**

IDP and CIL\Tariff contributions towards green infrastructure.

Sustainability Issues – Energy Efficiency

3. **Energy Efficiency** concerns, extract from the Inspectors note:

The overall message of the Planning Policy Statement 1 Planning and Climate Change (PPS1 supplement) appears to be either to keep to **national targets** to be expressed through progressive tightening of the Building Regulations or, if appropriate, to propose alternative requirements provided that local circumstances clearly warrant and allow that. It is clearly stated that such requirements should focus on ‘development area or site-specific opportunities’.

It is unclear whether the local study ENV5 establishes that realistic energy generation potential in the area so comparatively exceeds any national norm as to represent a major ‘**local circumstance**’ **likely to be able to justify such a policy**.

While the scale of development at the major locations identified in the JCS may provide opportunities for the type of ‘development area or site-specific’ approach referred to in the PPS1 supplement (if other circumstances are right), **policy 3 does not clearly address that point or relate to the major locations**.

Another area of concern centres on **housing delivery**. ENV5 goes into some detail on what might be the acceptable costs for developers in achieving zero carbon standards. The study appears to rule out the practicability of zero carbon measures for at least 44% of the new housing (urban and rural infill schemes and some of the smaller expansion areas). Planning Policy Statement 22: Renewable Energy (PPS22) advises that **targets should not be framed so as to place an undue burden on developers**; this message is reflected in East of England Plan Policy ENG1, which tempers ambition with viability in selecting targets.

If the impact of policy 3 were likely to result in **significant viability doubts** for certain forms and types of housing, (eg affordable housing on small infill sites that are often in sustainable locations), GNDP may need to consider whether or not changes to the JCS would be necessary to make it ‘justified’, ‘effective’ and ‘consistent with national policy’

We conclude that there is a need for GNDP to consider whether policy 3 should be made consistent with national policy, simplified, and made more straightforward to administer.

3.1 Brief summary of the response given to the Inspector at the EM:

1. The team assured the Inspector that there was evidence to support Policy 3 from the study. The Policy is based on evidence from the Sustainable Energy Study for the Joint Core Strategy. Following advice from the evidence study, it provides a selective approach for energy

production for new development dependent on the scale of development as larger scale on site energy production is more cost effective. It does not differentiate between Code for Sustainable Homes requirements as the higher the standards of energy efficiency in new housing, the lower the amount of energy required to serve the development.

4. **Work Programme for completion before the hearings**

4.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.

4.2 **Justification of Policy 3** – Provide the Inspector with an explanation on why Policy 3 is justified and relate the study to the nationally prescribed guidance that was followed. Review the evidence in the Study and signpost the Inspector to the evidence to support the Policy. Provide an explanation of the requirements for major and smaller locations and check that the Policy makes the requirements clear.

Output 1: Paper for the Inspector clarifying the evidence from the Energy Study which provided the basis for the Policy

4.3 **Viability of housing delivery** – This will be included in the Affordable Housing study – check that it covers all concerns raised by the Inspector.

Output 2: Provide evidence from the Affordable Housing Study

4.4 **Projects linked to this work**

Affordable Housing viability study – to assess effect of any additional burden if higher targets are in place above national policy.

Sustainability Issues – Water

5. Water concerns, extract from the Inspectors note:

Our main concerns relate to **possible impacts on the quantity and quality of water courses**, including the Broads, in relation to water abstraction and whether the **capacity of the waste water treatment** infrastructure is likely to be capable of improvement to accommodate the demands that would be progressively placed on it during the plan period. In particular, it would appear that progress in delivering the **north-east** growth sector would be limited to **4,000** dwellings in advance of the main interceptor sewer.

For the JCS to be effective, the practicability of the improvement measures for the water and sewerage infrastructure, and the availability of adequate sources of funding, needs to be realistically identified and linked to the critical path.

5.1 Brief summary of the response given to the Inspector at the EM:

1. Over-abstraction is not an issue – the review of consents will give Anglian Water the opportunity to resolve the issues (this is endorsed by the Position Statements).
2. The Partnership is actively engaged with Anglian Water and a series of meetings are underway, the first meeting to consider delivery was held on 6 May 2010.. Discussions are also ongoing with the Landowner at Long Stratton.

6. Work Programme for completion before the hearings

6.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.

6.2 Impacts on water courses: The Inspectors concerns on water supply and waste management continue to be managed via conversations with Anglian Water, Environment Agency, Natural England and the Broads Authority. The issues are well-known to the GNDP and are also being managed at a regional level by the Water Partnership Board via GO-East. The GNDP will continue to work with Anglian Water to understand potential solutions.

Output 1: Supply the Inspector with a record of meetings, and meeting notes prior to the EIP to show how the water and waste issues are being managed.

Output 2: Provide update position Statements from Anglian Water, Environment Agency, Natural England and Broads Authority for the EIP.

6.3 North-east, limits on development : Discussions with Anglian Water already indicate that solutions to connection of new developments will be

dealt with on a case by case basis when planning applications are received, taking account of the findings of the Water Cycle Study. Certainty over the best solutions cannot be known at present – dialogue will continue with Anglian Water. Funding will be picked up in the IDP.

Output 3: Supply the Inspector with a record of meetings, and meeting notes prior to the EIP to show how the water and waste issues are being managed.

6.4 **Projects linked to this work**

IDP and CIL\Tariff contributions towards water issues.

7. **Outputs summary, resources and timetable**

| | Output | Who | By when |
|----|---|--|---|
| | Green Infrastructure | | |
| 1. | <p>DPDs Produce table\diagram of documents to follow JCS for each district</p> <p>LDS updates - Check LDS for each district and update where required.</p> <p>Output 3: Replace diagram on page 35 of LDS</p> | <p>Roger Burroughs, Tim Horsepole, Mike Burrell</p> <p>Amy Baxter</p> | <p>19 July 2010</p> <p>(already prepared)</p> |
| | Energy | | |
| 2. | <p>Justification of Policy 3 - Paper for the Inspector clarifying the evidence from the Energy Study which provided the basis for the Policy</p> <p>Viability concerns - Provide evidence from the Affordable Housing Study and signpost to the Inspector</p> | Mike Burrell | 19 July 2010 |
| | Water | | |
| 5 | <p>Impact on Water Courses: Supply the Inspector with a record of meetings, and meeting notes prior to the EIP to show how the water and waste issues are being managed.</p> <p>Provide update position Statements from Anglian Water, Environment Agency, Natural England and Broads Authority for the EIP.</p> <p>North-east , limits on development - Supply the Inspector with a record of meetings, and meeting notes prior to the EIP to show how the water and waste issues are being managed.</p> | <p>Mike Burrell</p> <p>Mike Burrell, Amy Baxter</p> <p>Mike Burrell, Roger Burroughs</p> | <p>27 August 2010</p> <p>27 August 2010</p> <p>27 August 2010</p> |

Greater Norwich Development Partnership (GNDP)

6. The North-East Triangle

1. Requirement following the Exploratory Meeting

1.1 The Inspectors notes of the Exploratory Meeting held on 13 May identified further work the Partnership needs to undertake to address their concerns in relation to the north-east triangle.

1.2 The Inspector raised three main concerns, extract from the Inspectors note:

The **first** is **procedural**: is it appropriate for the post-submission change re-labelling the growth area a 'strategic allocation' (to be followed up via a Supplementary Planning Document - SPD), rather than a growth 'location' (to be followed up through an Area Action Plan - AAP) to be regarded as a 'minor' one which can be treated as embedded in the submitted strategy? Or is this a change which should be **advertised** so that members of the public are presented with the opportunity, should they wish to do so, of making representations about the soundness or legal implications of proceeding in that way? In our view this is a change which should be advertised and we ask that this be done.

The **second** concern relates to whether or not policy 10 gives a fully effective strategic, statutory brief for future planning on the 'what/where/when/how' questions surrounding the planning and effective delivery of the growth triangle, given that some of GNDP's replies to our initial Q19 are not clearly specified or referenced in the JCS itself. In particular, there is no clear description of the way in which **a single coordinated approach will be secured to the planning of the 'whole area'**, particularly the provision of timely, appropriately-located and equitably financed infrastructure. Inferences about some of these matters can be gained from other sections of the JCS but in view of the size of this area, and its centrality to the JCS, some further detail within the policy and its accompanying text seems to be required.

Our **third** concern relates back to matters raised previously in this letter – ie the evidential soundness behind the JCS references to the **public transport infrastructure** intended to serve this major development area, eventually accommodating at least 10,000 dwellings. This concern is emphasised by the fact that the first stages are likely to be in a detached (currently rural or semi-rural) location at the Rackheath Ecotown, an area which will only slowly become a physical part of the wider urban area over a length of time as yet unknown. We would look for convincing evidence that there is a realistic prospect of high quality, regular services being available at an early date.

1.3 Brief summary of the response given to the Inspector at the EM:

1. In practicality Rackheath Eco-Community comes forward quickly because of funding not through any deliberate phasing – the rest of the Growth Triangle will come forward as quickly as it is able to.
2. There will be a signed consortia agreement to co-ordinate development.
3. Consultants are being engaged to develop a Masterplan which will be consulted on.

2. **Work Programme for completion before the hearings**

2.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.

2.2 **Procedural:** A Concept Statement will be prepared on the north-east triangle that can be added to the JCS as an Appendix. Broadland District Council will advertise and consult on the principles for development in the north-east area, starting mid-June for 12 weeks.

Output 1: Broadland DC to advertise the change to a strategic allocation and carry out consultation on the principles of an early SPD

2.3 **Single co-ordinated approach:** The response submitted to the Inspectors pre-EM meeting questions set out the intended approach as below:

Need for overall coordination:

- The JCS policy stresses the need for **single coordinated approach**, with more **detailed masterplanning** of each individual quarter. The progress of the eco community will be guided by the specific requirements of the PPS 1 supplement .The GNDP, and Broadland District Council, recognize the desirability of the triangle as a whole comprising individual quarters with their own identity, and that this is likely to be best achieved by having a dedicated master plan for each. However, there are certain aspects which need co-ordination across the individual quarters
- Development of the parts of the triangle (outside of the Eco-Community) is dependent on the cooperation of a number of landowners. However, over the development of the JCS, these have largely coalesced into two groups, Broadland Land Trust, represented by Savills, and a group fronted by Bidwells/ Blue Living. Both have submitted co-ordinated representations in response to the publication of the JCS
- One of these groups, Broadland Land Trust, has already initiated some preliminary thinking on masterplanning through a scoping event led by the Prince's Foundation for the Built Environment using the Enquiry by Design process.

Output 2: Broadland DC to appoint consultants to carry out masterplan for the north-east triangle.as a blueprint for developers.

Output 3: Broadland DC will continue pursue 'sign-up' to a consortia agreement

2.4 **Public transport infrastructure** intended to serve this major development area, eventually accommodating at least 10,000 dwellings.

Output 4: Need to ensure this is covered in the by Public Transport work being carried out to meet Inspectors concerns on the wider PT issues, with a specific reference to phasing and funding in north-east pre and post NDR.

2.5 **Projects linked to this work**

The post EM brief covering 'The distribution of development, particularly in relation to public transport opportunities'

Broadland District Councils advertisement and consultation programme for north-east proposals

3. Outputs summary, resources and timetable

| | Output | Who | By when |
|----|--|--|--|
| 1. | Procedural Broadland intends to advertise the change to a strategic allocation and carry out consultation on the principles of an early SPD | Roger Burroughs and BDC | Mid June to mid-Sept (12 weeks) |
| 2. | Single coordinated approach Broadland DC to appoint consultants to carry out masterplan for the north-east triangle.as a blueprint for developers. Broadland DC will continue pursue 'sign-up' to a consortia agreement | Roger Burroughs and BDC | Approx Sept 2010 Approx Sept 2010 |
| 3 | Public transport infrastructure: Ensure this is covered in the by Public Transport work being carried out to meet Inspectors concerns on the wider PT issues, with a specific reference to phasing and funding in north-east pre and post NDR. | Ricahrd Doleman, Ann Carruthers, Transport Strategy team | 27 August 2010 |

Greater Norwich Development Partnership (GNDP)

7. Consultation

1. Requirement following the Exploratory meeting

1.1 The Inspectors notes of the Exploratory meeting held on 13 May identified further work the Partnership needs to undertake prior to the Joint Core Strategy EIP.

1.2 The areas identified are:

- Infrastructure
- Affordable housing
- The distribution of development
- Northern Distributor Road
- Sustainability Appraisal
- The North-East growth triangle

1.3 As a result the Partnership may be required to consult on a number of changes to the Submission document of the Joint Core Strategy. These changes would be the following:

- Policy 4:Housing delivery – the results of the Affordable housing Study will determine if the policy requires amendment
- Affordable housing numerical targets – to be added as requested by Inspector
- Additional appendix: North-east concept statement
- Sustainability appraisal

2. Work programme for completion before the hearings

2.1 **In order to meet the requirements of the Town and Country Planning (Local Government) (England) Regulations 2004, if there is a decision to make any changes to the JCS the Partnership would be required to:**

- Make the schedule of proposed changes available at the District Council offices, County Hall and Dragonfly House
- Publish the changes on the Partnership's website
- Give notice of the consultation in the papers
- Give notice to those people who submitted regulation 27 representations and those people who requested to be notified
- Send the schedule of proposed changes to the government office
- If no changes are required the GNDP would write to the inspector making this clear and asking for the EIP to commence ASAP

24/06/2010

- **GNDP Policy Group sign-off for consultation**
Paper to Policy Group setting out the requirements and outline timetable. A note of Policy Group Meeting with recommendations to be approved by Councils at Meetings.
- **Council sign-off for consultation**
 - Broadland Full Council – 06/07/2010
 - City Council Full Council – 29/06/2010
 - South Norfolk Full Council - awaiting date
 - Norfolk County Council Cabinet – 12/07/2010
 -
- **Preparation of consultation materials**
Output 1: Consultation materials:
 - Schedule of proposed changes (see 1.3 above)
 - Document set-up on JDi
 - Press notice
 - Notice on www.gndp.org.uk and other district/county websites
 - Letter to representors
 - Letter to GO East

19/07/2010 – 30/08/2010

- **6 week consultation**
Output 2: Consultation
 - Log of representations received
 - All representations logged in JDi

17/09/2010

- **Review representations**
Output 3: Statement of representations received and summary of issues raised
Output 4: Copies of representations received

23/09/2010

- **GNDP Policy Group** Paper on results of consultation seeking approval to submit to Inspector.
- **Full Council sign-off** Minutes / recommendations to be ratified at Council meetings:
 - Broadland (Full Council) – 28/09/2010
 - Norwich City Council (Full Council) – 28/09/2010
 - South Norfolk (Full Council) – 20/09/2010
 - Norfolk County Council (Cabinet)–13/09/2010or11/10/2010

3. Outputs summary, resources and timetable

| | Output | Who | By when |
|----|--|--|--|
| 1. | Output 1: Consultation materials: <ul style="list-style-type: none"> • Schedule of proposed changes • Sustainability appraisal • Document set-up on JDi • Press notices (Eastern Daily Press, Eastern Evening News, Great Yarmouth Mercury, Beccles and Bungay Journal, North Norfolk News, Norwich Advertiser, Wymondham, Attleborough Mercury, Diss Mercury). • Notice on www.gndp.org.uk • Letter to representors • Letter to GO East • Sign-off Process | Ruth Charles, Amy Baxter, Kim Woodhouse, Helen Bartlett, Helen Lambert, PSG Policy Group Broadland (Full council) City Council (Exec) South Norfolk (LDF) South Norfolk (Cabinet) Norfolk County Council (Cabinet) | 08/07/2010 24/06/2010 06/07/2010 07/07/2010 07/07/2010 12/07/2010 12/07/2010 |
| 2. | Output 2: Consultation <ul style="list-style-type: none"> • Log of representations received • All representation logged in JDi | Amy Baxter, Helen Bartlett, Ruth Charles, Helen Lambert, additional officers from districts | 3 Sept 2010 |
| 3. | Output 3: Statement of representations and summary of issues raised | Roger Burroughs, Amy Baxter | 17 Sept 2010 |
| 4. | Output 4: Copies of representations received | Kim Woodhouse, Amy Baxter | 17 Sept 2010 |
| 5. | Output 5: Report on consultation Sign-off | GNDP Policy Group | 23/09/2010 |

Brief – Consultation

Project Leads – Ruth Charles, Amy Baxter & Helen Lambert

| | | | |
|--|--|---|---|
| | | Broadland (Full Council) Norwich City (Full Council) South Norfolk (Full Council) Norfolk County Council (Cabinet) | 28/09/2010 28/09/2010 20/09/2010 13/09/2010 or 11/10/2010 |
|--|--|---|---|

**Joint Core Strategy :
Preparation for the Examination in Public
Infrastructure Categorisation**

Report by the GNDP Directors

Summary

This report sets out the proposed response to the Planning Inspector's concerns on the categorisation of infrastructure requirements to support the delivery of the Joint Core Strategy. It follows on from the report presented to the GNDP Policy Group meeting on 27 May 2010 which summarised the Inspectors conclusions from the Exploratory Meeting held with the Greater Norwich Development Partnership on 13 May 2010.

As requested by the Inspector, in his conclusions, the items shown in Appendix 7 of the Joint Core Strategy have been categorised to clarify their criticality in relation to commencement of development in line with the housing trajectory.

This piece of work is included in the wider work programme set up to address the six concerns and conclusions set out by the Inspector in his report. This work has been carried out to address part of Item 1 Infrastructure, in his note of the Exploratory Meeting.

Members are asked to agree the definitions for the categorisation as set out in detail in Appendix 1 and to agree the revised tables showing priorities and phasing as per Appendix 2.

Recommendation

- (i) Agree the definitions of Priority 1, 2 and 3 as set out in Appendix 1 of this report.
- (ii) Agree the tables as presented in Appendix 2 of this report

1. Background

- 1.1. The report below shows how we intend to deal with the Inspector's conclusions on infrastructure categorisation that came out of the Exploratory Meeting for the Joint Core Strategy held on 13 May 2010.

2. Infrastructure Categorisation in the Joint Core Strategy

- 2.1. At the Exploratory Meeting held on 13 May 2010 the Inspector raised his concerns that all the infrastructure requirements listed in Appendix 7 of the Joint Core Strategy (JCS) were categorised as 'critical', he asked if they were all truly 'critical' or could development commence without them.
- 2.2. The Inspector made it clear that the Planning Inspectorate's advice states that the key infrastructure items required to enable delivery of the major developments in the

Development Planning Document need to be firmly and clearly identified and their implementation shown to be reasonably assured.

- 2.3. The Inspector also asked for a critical path to be prepared setting out the links between each of the housing growth areas and the infrastructure necessary for their completion within the timescale of the housing trajectory. The Inspector also said it would be helpful if the critical path could identify which infrastructure projects are truly 'critical' and which may be of lesser importance but still desirable. He asked for clarity to show a) the degree of criticality of certain infrastructure projects (i.e. the extent to which they represent a fundamental constraint on the commencement of development) and b) the likelihood of their delivery within the necessary timescales.

2.4. **Response made to the Inspector at the Exploratory Meeting**

- 2.5. At the Exploratory Meeting the GNPD assured the Inspector that the tables in Appendix 7 could be clarified as requested and volunteered to re-visit the tables making it clear what the dependencies are and their categorisation. A critical path would also be prepared for inclusion in the JCS clearly setting out the links between infrastructure and development as requested by the Inspector.

The categorised list and the critical path would be incorporated into the Integrated Delivery Programme which will be available at the hearings.

2.6. **Work completed to date**

- 2.7. In order to be sure that Inspectors concerns are addressed the team re-visited the PINS Guidance which says –

“the amount of detail that it is possible to supply is less certain and comprehensive for the later stages of the plan period... for the first five years of the plan it should be clear what infrastructure is required, who is going to fund and provide it and how it is going to relate to the rate of development”

“Clearly many planning authorities are finding it difficult to effectively engage with the infrastructure providers. In some instances there appears to be very little that a planning authority can do about this... this Inspector will take a realistic view about what the council can provide so long as the council has made all reasonable attempts to engage with the infrastructure provider in question. Councils who face these sort of difficulties should provide, in the evidence base, details of what steps they have taken and what assumptions have been made in response to the difficulties...”

- 2.8. With the Inspector's conclusions in mind and the PINS Guidance re-visited, the table set out in Appendix 7 of the JCS has been reviewed and revised.
- 2.9. In order to provide sufficient clarity for the Inspector the infrastructure list has been re-categorised under the three headings Priority 1, 2 and 3 and split into short, medium and long-term phases in line with the housing trajectory.
- 2.10. The categorisation of priority 1, 2 and 3 is defined as:

Priority 1 Infrastructure is fundamental to the strategy or must happen to enable physical growth. It includes key elements of transport, water and electricity infrastructure.

Priority 2 Infrastructure is essential to significant elements of the strategy and required if growth is to be achieved in a timely and sustainable manner.

Priority 3 Infrastructure is required to deliver the overall vision for sustainable growth but is unlikely to prevent development in the short or medium term. The overall quality of life in the area is likely to be poorer without this infrastructure.

Appendix 1 of this Report provides more detail on the definitions.

- 2.11. Using the categories described in 2.10 the tables shown in Appendix 7 of the JCS have been revised as attached at Appendix 2.

The revised list shows:

1) **The Priority 1, 2 and 3 projects** split into the phases

2008-2016 short-term (this includes periods from 2008 to 2011 plus the first 5 years of delivery post adoption of the JCS)

2016 – 2021 medium term

2021 – 2016 long-term

The items listed in Appendix 7 are included in the revised priority tables, however there are a few instances where updated information has been received, these amendments have been made in order to update the list. These amendments can be tracked back via an audit trail.

Please note - as stated in the original Appendix 7 of the JCS *"The tables are an initial high-level overview of the infrastructure required. All Figures are indicative and are likely to vary in the light of future economic, market and policy changes. They will be subject to periodic review "the projects and costs are an indication and not actual costs at this time and are therefore subject to change as the requirements become more well-defined"*.

- 2.12. Further work on identifying funding sources to support delivery of the total infrastructure required to delivery sustainable communities is continuing as part of the development of a CIL\Tariff arrangement. Members will have an opportunity to make decisions on funding options at a later date once further work in understanding the viability, funding sources and finance options has taken place.

3. **Resource Implications**

- 3.1. **Any other implications** : Officers have considered all the implications which members should be aware of. Apart from those listed in the report (above), there are no other implications to take into account.

Recommendation / Action Required GNDP Policy Group

- (ii) Agree the definitions of Priority 1, 2 and 3 as set out in this report.
- (iii) Agree the revised lists as presented under the priorities and phases

Background Papers

Inspector's Conclusions following the Exploratory Meeting held 13 May 2010

Officer Contact

If you have any questions about matters contained in this paper please get in touch with:

| Name | Telephone Number | Email address |
|-----------------|-------------------------|------------------------|
| Sandra Eastaugh | 01603 638302 | s.eastaugh@gndp.org.uk |

Infrastructure Prioritisation

PPS12 gives little guidance on how to categorise infrastructure. It requires that *“The core strategy should be supported by evidence of what physical, social and green infrastructure is needed to enable the amount of development proposed for the area, taking account of its type and distribution”* and that this infrastructure should be *“prioritised in discussions with key local partners”*. While this could be interpreted as focussing simply on the quantum of growth PPS12 also makes it clear that spatial planning *“orchestrates the necessary social, physical and green infrastructure to ensure sustainable communities are delivered”*;

The Greater Norwich Infrastructure Needs and Funding Study provides the initial evidence on infrastructure need. Its development included engagement with key local partners. The Study categorises infrastructure under 3 categories (page 194):

- Critical Infrastructure “must happen to enable physical growth”
- Essential infrastructure “is required if growth is to be achieved in a timely and sustainable manner”
- Desirable infrastructure “is required for sustainable growth but is unlikely to prevent development in the short to medium term”

The PINS LDF note “Examining Development Plan Documents : Learning from experience has been produced more recently and suggests :

“Critical dependencies need to be identified; the council may consider breaking these infrastructure requirements into essential and desirable categories”.

PINS advice therefore is that there are two categories of critical infrastructure: infrastructure that is critical/essential and infrastructure that is critical/desirable.

The Inspectors appointed to examine the JCS have taken a slightly different approach to terminology and have asked for a critical path identifying “which infrastructure projects are truly ‘critical’ and which may be of lesser importance but still desirable”.

Appendix 7 of the submitted JCS uses the term “critical to” to identify the infrastructure dependencies of various locations and other elements of the Strategy. This use of the word critical in this context has caused some confusion.

In order to try to avoid any further confusion arising from the slightly different use of the words “critical, essential and desirable” we have moved to a categorisation based on priorities. This is derived from the Greater Norwich Infrastructure Needs and Funding Study (in particular see Page 194) but also expands on Study’s definition of categories which did not explicitly recognise the differential impact on the overall strategy. Consequently, IDP categories are:

Priority 1 Infrastructure is fundamental to the strategy or must happen to enable physical growth. It includes key elements of transport, water and electricity infrastructure. Failure to deliver infrastructure that is fundamental to the strategy would have such an impact that it would require the strategy to be reviewed. This particularly applies to the NDR and associated public transport enhancement. The sustainable transport requirements of the strategy and much of the development to the north of the built up area is dependent on these key elements of NATS.

Priority 2 Infrastructure is essential to significant elements of the strategy and required if growth is to be achieved in a timely and sustainable manner.

Failure to address these infrastructure requirements is likely to result in the refusal of planning permission for individual growth proposals, particularly in the medium term as pressures build and any existing capacity is used up.

Priority 3 Infrastructure is required to deliver the overall vision for sustainable growth but is unlikely to prevent development in the short to medium term. The overall quality of life in the area is likely to be poorer without this infrastructure

Failure to address these infrastructure requirements is likely to result in the refusal of planning permission for individual growth proposals

Additional notes:

PPS12 states It is important therefore that the core strategy makes proper provision for such uncertainty and does not place undue reliance on critical elements of infrastructure whose funding is unknown. The test should be whether there is a reasonable prospect of provision. Contingency planning – showing how the objectives will be achieved under different scenarios – may be necessary in circumstances where provision is uncertain.

PINS advise : “In a number of instances the infrastructure content of plans amounts to little more than a generalised and highly ambitious “wish list” with no indication of how viable the schemes are, how critical they are to the delivery of the plan or whether there is a reasonable prospect of implementation within any required timetable. Where an element of infrastructure is critical but it is uncertain whether it can be delivered, the plan should deal with the question of what the consequences are and what contingency arrangements may be possible – in other words the “what if” question.

Infrastructure Categorisation: Priority 1 projects 2008 -2016

The base date for the Strategy is 2008. This table includes projects from 2008 - 2011 (the adoption of the Strategy) and 2011 - 2016 (the first 5 years of delivery post adoption)

| | | | | |
|--|------------------------------------|--------------------------|--|--|
| Water | | | | |
| The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 1 are Transport and Utilities. All potable water improvements are delivered through the AMP process and are not included in this table. | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| Connection to existing sewerage | Developer | TBA | 2016 | Rackheath eco-community |
| Electricity | | | | |
| The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 1 are Transport and Utilities. The Infrastructure Needs and Funding Study 2009 assumes electricity and power supply will be 70% funded by service providers. | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| New primary sub-station on existing site (Hurricane Way) | EDF energy | 5.5 | 2016 | Expansion of the employment area - airport business park |
| Transportation | | | | |
| The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 1 are Transport and Utilities | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| Barrack Street ring-road improvement works | Norfolk County Council | 1.3 | Delivered | Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle • Broadland: Smaller sites in the NPA (2000 dwellings) • Norwich Area Transportation Strategy including delivery of BRT • Broadland Business Park • Airport employment allocation |
| Grapes Hill bus improvements | Norfolk County Council | 0.18 | Delivered | Norwich Area Transportation Strategy including delivery of BRT • City Centre bus enhancements |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

| | | | | |
|---|--|-------|-------------|--|
| Bus improvements Newmarket Road | Norfolk County Council | 0.4 | Delivered | Wymondham, Hethersett and Cringleford • Norwich Area Transportation Strategy including delivery of BRT |
| Bus improvements Dereham Road phase 1 | Norfolk County Council | 1.25 | 2010 | Norwich Area Transportation Strategy including delivery of BRT • City Centre bus enhancements |
| St Augustine's Gyratory | Norfolk County Council | 3.49 | 2010 | Norwich Area Transportation Strategy including delivery of BRT • City Centre bus enhancements |
| Postwick Hub | Norfolk County Council | 23.5 | 2012 | Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle • Broadland: Smaller sites in the NPA (2000 dwellings) • Norwich Area Transportation Strategy including delivery of BRT • Broadland Business Park • Airport employment allocation |
| Norwich Northern Distributor Road | Norfolk County Council | 106.2 | 2013 - 2015 | Overall scale of growth • Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle • Broadland: Smaller sites in the NPA (2000 dwellings) • Norwich Area Transportation Strategy including delivery of BRT • Broadland Business Park • Airport employment allocation |
| City Centre bus improvements phase 1 | Norfolk County Council/ Norwich City Council | 1 | 2010 - 2016 | Overall scale of growth • Norwich Area Transportation Strategy including delivery of BRT • City Centre |
| Norwich Research Park transport infrastructure phase | Norfolk County Council/ Highways Agency | 5 | 2016 | Norwich Research Park |
| Bus improvements via Salhouse Road and Gurney Road | Norfolk County Council | 1.8 | 2011 - 2016 | Rackheath eco-community |
| Bus priority route via Hethersett Lane/ Hospital/ Norwich Research Park/ University of East Anglia/ City Centre | Norfolk County Council | 2.7 | 2011 - 2016 | Wymondham, Hethersett and Cringleford • Norwich Area Transportation Strategy including delivery of BRT • Norwich Research Park |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

| | | | | |
|--------------------------------------|------------------------|---------------|-------------|--|
| Bus priority route via B1172 phase 1 | Norfolk County Council | 1.7 | 2011 - 2016 | Wymondham, Hethersett and Cringleford • Norwich Area Transportation Strategy including delivery of BRT |
| Totals | | 154.02 | | |



The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

Infrastructure Categorisation: Priority 1 projects 2016 -2021

| Water | | | | |
|--|--------------------------------|----------------------|------------------------------------|--|
| <p><i>The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 1 are Transport and Utilities. All potable water improvements are delivered through the AMP process and are not included in this table.</i></p> | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| Interceptor sewer | Developer | TBA | 2021 | Hethersett, Cringleford, Easton/ Costessey |
| Interceptor sewer | Developer | TBA | 2021 | Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle |
| Electricity | | | | |
| <p><i>The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 1 are Transport and Utilities. The Infrastructure Needs and Funding Study 2009 assumes electricity and power supply will be 70% funded by service providers.</i></p> | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| New primary sub-station on new site (Norwich Airport North) | EDF energy | 6.3 | 2021 | Expansion of the employment area - airport business park |
| New grid sub-station on existing sites (Norwich East) | EDF energy | 17 | 2021 | Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

| | | | | |
|--|--|----------------------|------------------------------------|---|
| Transportation | | | | |
| <i>The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 1 are Transport and Utilities</i> | | | | |
| | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| Long Stratton bypass A140 including improvement at Hempnall cross- | Norfolk County Council | 20 | 2016 | Long Stratton |
| Norwich Research Park transport infrastructure phase | Norfolk County Council/ Highways Agency | 8 | 2016 - 2021 | Norwich Research Park |
| Bus priority - approach to Harford Junction | Norfolk County Council | 2 | 2021 | Long Stratton |
| Thickthorn junction improvement including bus priority and park and ride improvements | Norfolk County Council/ Highways Agency | 40 | 2021 | Wymondham, Hethersett and Cringleford |
| City Centre bus improvements phase 2 | Norfolk County Council/ Norwich City Council | 6 | 2016 - 2021 | Overall scale of growth • Norwich Area Transportation Strategy including delivery of BRT • City Centre |
| Bus improvements via Salhouse Road and Gurney Road | Norfolk County Council | 2.6 | 2016 - 2021 | Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle • Norwich Area Transportation Strategy including delivery of |
| Bus improvements Dereham Road phase 2 | Norfolk County Council | 2.6 | 2016 - 2021 | Norwich Area Transportation Strategy including delivery of BRT • City Centre bus enhancements |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

| | | | | |
|--------------------------------------|------------------------|---------------|-------------|---|
| Bus priority route via B1172 phase 2 | Norfolk County Council | 0.6 | 2011 - 2016 | Wymondham, Hethersett and Cringleford • Norwich Area Transportation Strategy including delivery of BRT |
| Totals | | 105.10 | | |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

Infrastructure Categorisation: Priority 1 projects 2021 -2026

| Water | | | | |
|---|--------------------------------|----------------------|------------------------------------|--|
| <p><i>The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 1 are Transport and Utilities. All potable water improvements are delivered through the AMP process and are not included in this table.</i></p> | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| Interceptor sewer | Developer | tba | 2026 | Hethersett, Cringleford, Easton/ Costessey |
| Interceptor sewer | Developer | tba | 2026 | Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle |

| Electricity | | | | |
|--|--------------------------------|----------------------|------------------------------------|--|
| <p><i>The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 1 are Transport and Utilities. The Infrastructure Needs and Funding Study 2009 assumes electricity and power supply will be 70% funded by service providers.</i></p> | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| New primary sub-station on new site (Sprowston/ Rackheath) | EDF energy | 4.3 | 2026 | Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle |
| Replacement of transformers and switchgear in existing site (Hapton) | EDF energy | 2.53 | 2026 | Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle |
| Replacement of transformers and switchgear in existing site (Wymondham) | EDF energy | 2.53 | 2026 | |
| | | | | |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

| | | | | |
|--|--|----------------------|------------------------------------|---|
| Transportation | | | | |
| <i>The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 1 are Transport and Utilities</i> | | | | |
| | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| City Centre bus improvements phase 3 | Norfolk County Council/ Norwich City Council | 6 | 2021 - 2026 | Overall scale of growth • Norwich Area Transportation Strategy including delivery of BRT • City Centre |
| Bus improvements via Salhouse Road and Gurney Road phase 3 | Norfolk County Council | 0.6 | 2022 - 2026 | Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle • Norwich Area Transportation Strategy including delivery of BRT |
| Bus improvements Dereham Road phase 3 | Norfolk County Council | 2.6 | 2023 - 2026 | Norwich Area Transportation Strategy including delivery of BRT • City Centre bus enhancements |
| Totals | | 18.56 | | |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

Infrastructure Categorisation: Priority 2 projects 2008-2016

The base date for the Strategy is 2008. This table includes projects from 2008 - 2011 (the adoption of the Strategy) and 2011 - 2016 (the first 5 years of delivery post adoption)

| Education | | | | |
|---|--------------------------------|----------------------|------------------------------------|-------------------------|
| The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure | | | | |
| | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| 60 place pre-school | Norfolk County Council | 0.54 | 2011 | Norwich City |
| 60 place pre-school | Norfolk County Council | 0.54 | 2016 | Norwich City |
| Healthcare | | | | |
| The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. The Health Authority will take a flexible approach to the provision of hospital beds. Locations will be determined by the Health Authority at a later date. It is presumed funding will come through the AMP. | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates | Dependencies |
| Hospital bed requirements | Strategic Health Authority | 10 | 2016 | Overall scale of growth |
| Expansion of existing facilities (3 GPs and 3 Dentists) | Strategic Health Authority | 0.67 | 2011 - 2016 | |
| GPs Surgery (3 GPs) | Strategic Health Authority | 1.03 | 2011 | |
| Dentists surgery (4 Dentists) | Strategic Health Authority | 1.25 | 2016 | |
| Expansion of existing facilities (4 GPs and 4 Dentists) | Strategic Health Authority | 1 | 2011 | |
| Expansion of existing facilities (3 GPs and 3 Dentists) | Strategic Health Authority | 1 | 2016 | |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

| Green infrastructure | | | | |
|---|-------------------------|---------------|-----------------------------|-------------------------|
| <p><i>The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. Green infrastructure projects are being assessed following completion of the Green Infrastructure Delivery Plan. Open space will be planned in relation to each growth location and planned in line with development.</i></p> | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| Green infrastructure projects and open space | ? | tba | 2016 | Overall scale of growth |
| Totals | | 16.03 | | |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

Infrastructure Categorisation: Priority 2 projects 2016-2021

| Education | | | | |
|--|-------------------------|---------------|-----------------------------|---|
| The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| 60 place pre-school | Norfolk County Council | 0.54 | 2021 | Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle |
| 60 place pre-school co-located with 600sqm combined community space and library | Norfolk County Council | 0.54 | 2021 | Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle |
| 2FE primary with integrated 60 place nursery | Norfolk County Council | 5.14 | 2021 | Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle |
| 2FE primary with integrated 60 place nursery | Norfolk County Council | 5.14 | 2021 | Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle |
| 1400 secondary school with 280 sixth form places co-located with 4 x indoor sports courts phase 1 | Norfolk County Council | 26 | 2021 | Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle |
| 2FE primary with integrated 60 place nursery | Norfolk County Council | 5.14 | Estimated delivery dates by | Norwich City |
| 2FE primary with integrated 60 place nursery | Norfolk County Council | 5.14 | 2021 | Norwich City |
| 30 place pre-school | Norfolk County Council | 0.285 | 2021 | Wymondham |
| 2FE primary with integrated 60 place nursery | Norfolk County Council | 5.14 | 2021 | Wymondham |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

| | | | | |
|-----------------------------------|------------------------|------|------|--|
| 60 place pre-school | Norfolk County Council | 0.54 | 2021 | Hethersett |
| 60 place pre-school | Norfolk County Council | 0.54 | 2021 | Easton |
| 1200 (tbc) place secondary school | Norfolk County Council | 20 | 2021 | Wymondham, Hethersett, Cringleford, Costessey / Easton |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

Healthcare

The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. The Health Authority will take a flexible approach to the provision of hospital beds. Locations will be determined by the Health Authority at a later date. It is presumed funding will come through the AMP.

| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
|---------------------------|----------------------------|---------------|-----------------------------|-------------------------|
| Hospital bed requirements | Strategic Health Authority | 10 | 2016 | Overall scale of growth |

Healthcare continued

| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
|---|----------------------------|---------------|-----------------------------|--------------|
| Expansion of existing facilities (3 GPs and 3 Dentists) | Strategic Health Authority | 0.67 | 2011 - 2016 | |
| GPs Surgery (3 GPs) | Strategic Health Authority | 1.03 | 2011 | |
| Dentists surgery (4 Dentists) | Strategic Health Authority | 1.25 | 2016 | |
| Expansion of existing facilities (4 GPs and 4 Dentists) | Strategic Health Authority | 1 | 2011 | |
| Expansion of existing facilities (3 GPs and 3 Dentists) | Strategic Health Authority | 1 | 2016 | |

Green infrastructure

The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. Green infrastructure projects are being assessed following completion of the Green Infrastructure Delivery Plan. Open space will be planned in relation to each growth location and planned in line with development.

| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
|--|-------------------------|---------------|-----------------------------|-------------------------|
| Green infrastructure projects and open space | ? | tba | 2016 | Overall scale of growth |

| | | | | |
|---------------|--|--------------|--|--|
| Totals | | 89.10 | | |
|---------------|--|--------------|--|--|

Infrastructure Categorisation: Priority 2 projects 2021-2026

| Education | | | | |
|---|--------------------------------|----------------------|------------------------------------|---|
| <i>The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure</i> | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates | Dependencies |
| 60 place pre-school | Norfolk County Council | 0.54 | 2026 | Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle |
| 2FE primary with integrated 60 place nursery | Norfolk County Council | 5.14 | 2026 | Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle |
| 2FE primary with integrated 60 place nursery | Norfolk County Council | 5.14 | 2026 | Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle |
| 1400 secondary school with 280 sixth form places co-located with 4 x indoor sports courts phase 2 | Norfolk County Council | 13 | 2021 | Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle |
| 60 place pre-school co-located with 600sqm combined community centre and library | Norfolk County Council | 0.54 | Estimated delivery dates by | Norwich City |
| 60 place pre-school | Norfolk County Council | 0.54 | 2026 | Wymondham |
| 2FE place primary | Norfolk County Council | 4.6 | 2026 | Hethersett and Cringleford |
| 60 place pre-school | Norfolk County Council | 0.54 | 2026 | Long Stratton |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

| Education continued | | | | |
|---|-------------------------|---------------|-----------------------------|--|
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| 2FE primary with integrated 60 place pre-school co-located with combined community centre and library | Norfolk County Council | 5.86 | 2026 | Long Stratton |
| 60 place pre-school | Norfolk County Council | 0.54 | 2026 | Cringleford |
| 1FE primary | Norfolk County Council | 2.5 | 2026 | Easton |
| 1200 (tbc) place secondary school | Norfolk County Council | 10 | 2026 | Wymondham, Hethersett, Cringleford, Costessey / Easton |

Healthcare

The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. The Health Authority will take a flexible approach to the provision of hospital beds. Locations will be determined by the Health Authority at a later date. It is presumed funding will come through the AMP.

| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
|--|----------------------------|---------------|-----------------------------|---|
| Hospital bed requirements | Strategic Health Authority | 12 | 2026 | Overall scale of growth |
| Primary Care Centre (5 GPs and 4 Dentists) | Strategic Health Authority | 3.35 | 2026 | Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle |
| Combined surgery (2 GPs and 2 Dentists) | Strategic Health Authority | 1.5 | 2026 | Long Stratton |
| Expansion of existing facilities (1 GP and 1 Dentists) | Strategic Health Authority | 0.55 | 2021 - 2026 | Cringleford |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

| Green infrastructure | | | | |
|---|-------------------------|---------------|-----------------------------|-------------------------|
| <p><i>The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 1 are Education, Healthcare and Green Infrastructure. Green infrastructure projects are being assessed following completion of the Green Infrastructure Delivery Plan. Open space will be planned in relation to each growth location and planned in line with development.</i></p> | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| Green infrastructure projects and open space | ? | TBA | 2026 | Overall scale of growth |
| | | | | |
| Totals | | 66.34 | | |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

Infrastructure Categorisation: Priority 3 projects 2016-2021

| Community facilities | | | | |
|---|--------------------------------|----------------------|------------------------------------|---|
| <i>The table below lists the Priority 3 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 3 are Community facilities and Community services.</i> | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| Community facilities | District Councils | 2.25 | 2016 - 2021 | Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle |
| Community facilities | District Councils | 3.55 | 2017 - 2021 | Norwich |
| Community facilities | District Councils | 5.1 | 2018 - 2021 | South Norfolk |
| Community services | | | | |
| <i>The table below lists the Priority 3 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 3 are Community facilities and Community services.</i> | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| Fire Service | Norfolk County Council | TBA | TBA | Overall scale of growth |
| Ambulance Service | Norfolk Ambulance Service | TBA | TBA | |
| Police Safer Neighbourhood | Norfolk Constabulary | 5.25 | 2016-2021 | Broadland (53 officers) • Norwich (53 officers) • South Norfolk (88 officers) |
| Totals | | 16.15 | | |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

Infrastructure Categorisation: Priority 3 projects 2021-2026

| Community facilities | | | | |
|---|--------------------------------|----------------------|------------------------------------|---|
| <i>The table below lists the Priority 3 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 3 are Community facilities and Community services.</i> | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| Community facilities | District Councils | 2.25 | 2021-2026 | Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle |
| Community facilities | District Councils | 3.55 | 2021-2026 | Norwich |
| Community facilities | District Councils | 5.1 | 2021-2026 | South Norfolk |
| Community services | | | | |
| <i>The table below lists the Priority 3 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 3 are Community facilities and Community services.</i> | | | | |
| Scheme | Promoter/ Delivery body | Total Cost £m | Estimated delivery dates by | Dependencies |
| Fire Service | Norfolk County Council | TBA | TBA | Overall scale of growth |
| Ambulance Service | Norfolk Ambulance Service | TBA | TBA | Overall scale of growth |
| Police Safer Neighbourhood | Norfolk Constabulary | 5.25 | 2021 - 2026 | Broadland (53 officers) • Norwich (53 officers) • South Norfolk (88 officers) |
| Totals | | 16.15 | | |

The short, medium, long-term phasing is related to the published housing trajectory in the JCS but can change if any of the development comes forward earlier than anticipated or is delayed.

Joint Core Strategy – Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle – Strategic Allocation Concept Statement

1 SUMMARY

This report updates Members on some additional work required to secure the status of the growth triangle as a strategic allocation in the Joint Core Strategy, so that it can be progressed as a Supplementary Planning Document, as agreed by Broadland District Council Cabinet in December, and included in the Schedule of Minor Changes submitted to the Inspectorate in March.

2 BACKGROUND

- 2.1 In December, Broadland District Council Cabinet considered a report on how best to progress the planning of the urban extension to the north east of Norwich, proposed in the Joint Core Strategy (JCS), and including the eco community proposal at Rackheath. Hitherto it had been intended to progress the work through an Area Action Plan, but for a number of reasons set out in the report to the Cabinet, the conclusion was reached that it should be progressed as a supplementary planning document.
- 2.2 In order to facilitate this, a “minor change” to the JCS was proposed at the submission stage referring to the triangle as a strategic allocation, and clarifying the text to describe it in this way and avoid references to an area action plan.
- 2.3 The inspectors appointed to conduct an Examination into the JCS raised some questions about this prior to holding an exploratory meeting on the 13th of May. A comprehensive response setting out the reasons why the supplementary planning document approach was considered appropriate and, including reference to the decision taken by Broadland District Council Cabinet in December, was sent to the inspectors in response.
- 2.4 Following the exploratory meeting on the 13th of May, the Inspectors asked for some further work to be done.

3 THE ISSUES

- 3.1 The inspectors raised three main concerns, one procedural, one relating to the content of the JCS and one relating to public transport access to the growth triangle.
- 3.2 The procedural question concerns whether it is appropriate for the post-submission change re-labelling the growth area a ‘strategic allocation’ (to be

followed up via a Supplementary Planning Document - SPD), rather than a growth 'location' (to be followed up through an Area Action Plan - AAP) to be regarded as a 'minor' one, or a change which should be advertised so that members of the public are presented with the opportunity of making representations about the soundness or legal implications of proceeding in that way.

- 3.3 In the inspectors' view this is a change which should be advertised and they ask that this be done.
- 3.4 The second concern relates to whether or not policy 10 of the JCS gives a fully effective strategic, statutory brief for future planning on the 'what/where/when/how' questions surrounding the planning and effective delivery of the growth triangle, given that some of GNDP's replies to the inspectors' initial question are not clearly specified or referenced in the JCS itself.
- 3.5 In particular, they say there is no clear description in the JCS of the way in which a single coordinated approach will be secured to the planning of the 'whole area', particularly the provision of timely, appropriately-located and equitably financed infrastructure. Inferences about some of these matters can be gained from other sections of the JCS but in view of the size of this area, and its centrality to the JCS, the inspectors conclude that some further detail within the policy and its accompanying text seems to be required.
- 3.6 The inspectors' third concern relates to the evidence behind the JCS references to the public transport infrastructure intended to serve this major development area, eventually accommodating at least 10,000 dwellings. This concern is emphasised by the fact that the first stages are likely to be in a detached (currently rural or semi-rural) location at the Rackheath eco community, an area which will only slowly become a physical part of the wider urban area over a length of time as yet unknown. The inspectors ask for convincing evidence that there is a realistic prospect of high quality, regular services being available at an early date.

4 DISCUSSION

- 4.1 Of the three issues raised, the public transport issue will be addressed through clarification of evidence already provided by the County Council. However there are two other issues which are the subject of this report, namely publicity and the content of the JCS
- 4.2 If additional consultation is to be undertaken, it will need to be the context of the JCS. As well as this issue, that the inspectors have also raised questions about the affordable housing policy and required some additional work to be undertaken. This work is in hand. It is intended that potential changes to the JCS to deal with the inspectors' questions should be advertised. It is currently intended that this will be undertaken In July/August.
- 4.3 In the case of the growth triangle, the inspectors' questions could be

addressed through very minor changes to the wording of policy 10 of the JCS and the addition of an appendix in the form of a “concept statement” setting out further details of how development in the growth triangle is expected to take place.

- 4.4 Such a statement has been drafted and is appended to this report.
- 4.5 Because Broadland District Council is undertaking its own consultation work on carrying forward the proposals in the JCS as they affect Broadland, through planning documents covering site-specific allocations and the growth triangle, it is considered desirable that the opportunity for people to comment on the “concept statement”, and the proposal to progress through SPD if possible, should also be made known to people through the Broadland consultation exercise. However it is important that people clearly understand that any representations should be made through the GNDP process, since the District Council is already committed to a longer consultation process which will carry on after the closing date for GNDP representations.
- 4.6 In this regard, it is important that the “concept statement” adds sufficient clarity to satisfy the inspectors that the strategic allocation approach is appropriate, but does not prejudice the participative masterplanning exercises that the District Council is proposing. For this reason, it focuses on existing constraints and priorities and tries to highlight the limitations of options consistent with good planning.

5 PROPOSED ACTION

- 5.1 Subject to any views Members express, the proposed course of action is to include the “concept statement” within the GNDP consultation, but also to make it available at forthcoming Broadland exhibitions with suitable text signposting how people can respond to it.
- 5.2 Discussions with the Planning Inspectorate and Government Office suggest that, although this stage of plan making is not explicitly addressed in regulations, suitable advertisement and notification to those who made representations at the pre-submission publication stage, and to the defined specific consultation bodies, should be sufficient. This would include Parish Councils. The likely approach will be to notify these, informing them where they can see the consultation documents, but offering hard copies on request.

6 RESOURCE IMPLICATIONS

- 6.1 The additional work required by the inspectors, including the additional consultation work will have budgetary implications. Additional affordable housing work is being funded through the GNDP, but the consultation work will need to be funded from the local planning authorities’ budgets. If the work is undertaken as outlined above, this should be largely confined to postage and statutory advertisements.

7 LEGAL IMPLICATIONS

- 71 The purpose of the exploratory meeting was for the inspectors to set out any concerns ahead of a formal examination. One possible outcome, if they are not satisfied, would be the decision not to proceed. In the specific case of the triangle, this looks unlikely, as any concerns in the inspectors' minds could be addressed through reverting to the Area Action Plan approach, even though that is not the District Council's favoured approach. However, given that potential responses to other issues, in particular affordable housing, will need to be developed, and some advertised, there appears to be no potential disbenefit from advertising the "concept statement" as outlined above.

8 CONCLUSION

- 8.1 If the preferred course of action for dealing with the growth triangle, through a Supplementary Planning Document, is to be achieved, it is apparent the inspectors will require more clarity within the JCS. This could be achieved through an appendix setting out a "concept statement" and minor consequential changes to policy 10 of the JCS.
- 8.2 The Policy Group is asked to endorse this approach, but also to advise whether the appended concept statement represents a clear statement of the principles Members wish to see embedded in the growth triangle, and of the way they would wish to proceed.

9 OPTIONS

- 9.1 The Policy Group has the following options
1. Endorse the concept statement and consultation approach outlined above
 2. Propose amendments to the concept statement and/or consultation approach outlined above
 3. Propose a different course of action.

Phil Kirby
Strategic Director and Chief Planner, Broadland District Council

Background Papers

Questions raised by inspectors, and response on behalf of GNDP authorities before the Exploratory Meeting, and response by Inspectors following exploratory meeting all available at www.gndp.org.uk

For further information on this report call Roger Burroughs on (01603) 430558 or

638306 or e-mail roger.burroughs@broadland.gov.uk

Joint Core Strategy for Broadland, Norwich and South Norfolk

Draft Appendix

Old Catton, Sprowston, Rackheath and Thorpe St Andrew
Growth Triangle – Strategic Allocation Concept Statement

July 2010

Draft appendix for Joint Core Strategy

The Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle – Strategic Allocation Concept Statement

Introduction

1. Policy 10 identifies this location, shown on map 1, for a major urban extension, providing for 10,000 dwellings (7000 by 2026) served by new local facilities to complement the houses, including social facilities and employment, waste recycling and extensive green infrastructure. The extension is served by the proposed northern distributor road which will also facilitate the required emphasis on public transport, walking and cycling as principal modes of transport for the development. The policy requires that a co-ordinated approach to the development of the area be adopted. This statement is intended to give further detail and enable the development of the urban extension to progress through the preparation of a supplementary planning document leading to more detailed master plans.
2. The overriding priority is the creation of a special, distinct and exciting place to live and work, made up of communities with a strong sense of identity, respecting the features and settlements of the area and with ready access to work and facilities. Residents should be able to meet day to day needs locally but have easy access to the wider area. The keynote will be for the new development to minimise any adverse effects on the environment, and enhance it where possible. This concept statement seeks to help bring this about.

Rationale for a Strategic Allocation in the Joint Core Strategy (JCS)

3. The need to enable development to progress quickly is one of the principal priorities of Broadland District Council and its partners. There are a number of underlying factors why this is important.
 - Experience of the Councils as housing authorities confirms increasing housing pressure. Numbers on the housing registers rose from 2606 to 3278 (Broadland) and 10,874 to 16,706 (Greater Norwich) between 2005 and 2009. In Broadland, the ratio of house prices to incomes rose from 5.85 to 10.28 between 2001 and 2008. An East of England housing statement produced in 2010 confirms that Broadland is among the ten authorities where this ratio is most acute, and neighbouring Norwich among those with the most rapidly rising ratio.
 - There is an urgent need for properly planned growth to respond to the expected resurgence in the housing market rather than uncoordinated development. Planning policy statement 3 requires that if local planning authorities cannot demonstrate a five year supply of available and deliverable housing land, based on the provision required by the development plan they should respond favourably to planning applications to increase the supply. At 1 April, 2009, there was a supply of 6,609 dwellings compared with a

requirement based on this strategy, of 9,115, equivalent to a supply of 3.63 years in the Norwich policy area.

- Enabling rapid development will help facilitate the early provision of necessary new infrastructure as efficiently as possible, by allowing some larger scale investment to be supported by sufficient residents. This applies particularly to secondary education, local energy generation and public transport investment. The Government supported the development of an Eco community at Rackheath through publication of a supplement to Planning Policy Statement 1 in 2009. It is expected to begin delivering new houses in 2011/12. Although this is a distinct proposal in its own right, it will need to dovetail with development in the rest of the growth triangle. The Eco community will also have attributes which will affect and influence the remainder of the growth triangle, for example aspiration towards water neutrality and the emphasis on non car travel. This will be the subject of detailed local research in partnership with the relevant agencies.

Concept of development

Existing assets

4. It is essential that, although large scale development will bring about some changes in the character of the area, it is essential that it respects and protects the existing assets, and adds to them where possible. The assets are varied and include
 - *Landscape* :
5. The District Council had a landscape character assessment undertaken in 2008. All the land in the growth triangle is included within the "Wooded Estatelands" character area. A sub area of this character area includes all the land in the triangle immediately adjacent to the urban fringe. It has a mature landscape structure with more enclosure as a consequence of the trees in the landscape compared with the more open landscape in the west. Development should respect the rural character, retaining and enhancing the landscape structure, including restoration of hedgerows, and the setting of halls or houses and parkland. New development should also seek to respond to the historic settlement pattern, and the landscape setting of the villages, maintaining the distinction between the urban edge and villages. In some areas there is an opportunity to soften the urban edge. The north eastern part of the triangle forms another sub area. Here the topography is generally flatter, with lighter sandy soils, much of it historically heathland, There are Historic Parks at Rackheath, and Beeston St Andrew though neither are on the English Heritage register. Similar considerations apply to this area, though the character assessment also refers to the need for caution in accommodating tall structures.

- *Biodiversity :*

6. Much of the eastern side of Broadland, including the growth triangle, lies close to the Broads, an area of international wildlife importance. Outside the growth triangle, but nearby, there are Special Protection Areas and Special Areas of Conservation to the south east of Brundall, at Woodbastwick Marshes, and a small parcel to the north of the triangle at Crostwick Marsh. Some of these in the area of the Broads are also designated as Ramsar sites. Within the growth triangle, there are pockets of ancient woodland, close to Rackheath Park, and at the northern extremity. In addition, there are ancient woodlands outside but near the triangle. County wildlife sites are designated at Racecourse Plantation, and in the vicinity of Rackheath Park and the watercourse north of Rackheath.

- *Appropriate Assessment:*

7. An Appropriate Assessment of the JCS under the Habitats Regulations concluded that direct or indirect effects on sites of European wildlife importance were unlikely but that at the detailed planning stage attention would need to be given to the cumulative and in combination effects, and this would need to feed through into subsequent planning documents. In the case of the growth triangle particularly, the key issue is the provision of sufficient attractive green infrastructure to mitigate against adverse effects from increased visitor pressure on sensitive Broadland habitats

- *Settlements:*

8. Much of the area within the growth triangle is outside significant settlements. The exceptions are Rackheath, dominated by post war development, including significant employment development on the former airfield, and Thorpe End Garden Village. This was conceived as a garden village and developed in the 1930s. Subsequent development has eroded some of its original character, though this remains largely intact in the central core and southern part of the village.

- *Employment:*

9. The growth triangle includes significant concentrations of employment at Rackheath and the expanding Broadland Business Park/Broadland Gate. It is also close to significant employment areas at Salhouse Road, and near the Airport.

- *Movement including NDR:*

10. Roads in the immediate vicinity of the triangle are predominantly radial, with several such roads providing links to the Norwich urban area, including the city centre, and to the major road network via the

A1042/A140 outer ring road. The growth triangle is served by an existing station at Salhouse on the Norwich to Sheringham railway line. The line forms most of the eastern boundary of the triangle and can present a barrier to movements across the route. The area is close to Norwich Airport, though access and terminal facilities are located on the further, western side of the Airport. Car ownership rates in the triangle are currently significantly higher than for the East of England and England as a whole, particularly in the parts of the triangle furthest from the urban area. A Northern Distributor Road has been proposed for Norwich for some time. It has been awarded programme entry, and the necessary junction works at Postwick have been awarded additional funding. As a long standing element of the Norwich Area Transportation Strategy it is part of the “base line” for the development strategy. It will provide the opportunity for the reallocation of roads space to provide for high quality public transport, and enhanced walking and cycling.

Existing constraints

- *Airport public safety zone:*

11. Norwich International Airport is subject to public safety zones extending beyond the runway. The eastern public safety zone extends as far as the North Walsham Road and severely restricts development potential within its defined area.

- *Airport noise contours:*

12. The operation of the airport results in noise impacts in some of the nearby areas. Contours showing the predicted impacts of aircraft noise at 2015 further restrict the potential for development.

- *Utility constraints:*

13. The area is currently crossed by EDF Energy electricity supplies, both overhead and underground at voltages up to 132,000 volts. Development will require a new primary substation on the site owned by EDF energy at Hurricane Way, as well as local reinforcements in the Sprowston, Rackheath and Thorpe St Andrew areas, either by improvement of existing primary substations or the creation of new primary substations. Overall growth in the Greater Norwich area is likely to require improvements to existing grid stations or a new grid station on a site owned by EDF Energy near Broadland Business Park.
14. Water is supplied from the Heigham waterworks. While additional supplies are likely to be needed around 2015 to deal with overall growth in Greater Norwich, and can be provided under Anglian Water's asset management planning process, there are no specific water supply issues relating to the growth triangle, though some local network reinforcement is likely to be needed particularly in the southern

part. Wastewater will predominantly be processed at Whitlingham sewage treatment works, though there is the possibility of some being treated at Rackheath sewage treatment works, or by innovative means in the Eco community. Transfer to Rackheath would require new sewers, though initial transfer to Whitlingham would be possible utilizing an existing strategic sewer with capacity for 4000 houses above current commitments. This will allow adequate time for necessary reinforcements to be programmed.

15. Gas supplies will need to be provided through connection to existing intermediate pressure mains.

Development Proposals

- *Vision/ objectives*

Vision

The Growth Triangle will have developed into a special, distinct and exciting place through the delivery of 7,000 new homes by 2026 and continuing to grow to around 10,000 new homes thereafter. Alongside housing, employment opportunities, services, facilities and key infrastructure will have been delivered across three or four main development centres.

Development within the Growth Triangle will grow out of and reflect existing places and communities. Important landscape and heritage assets will have been preserved and enhanced. A multi-functional network of greenspaces and green links connecting to Norwich and the rural hinterland will have been provided. This green network will support the recreational and leisure need of the population whilst also supporting the conservation and enhancement of local wildlife.

The communities within the Growth Triangle will share a sense of identity rooted in respect for existing features of the area and its settlements and the enhancements and benefits provided by new development.

It will be easy to move around and within the three or four new development centres, between different centres and in to and out of existing settlements. Physical linkages between the older villages of the Growth Triangle and suburbs of its hinterland will have been created to support community integration and equity in access to services and facilities.

Within the Growth Triangle employment growth will have been achieved, including within green industries, building upon the eco-credential and economic attraction created by the development of the Growth Triangle. In addition, first rate connections will have been provided to the key employment locations of Broadland Business Park, the Airport Industrial Estate and Norwich City. These connections will provide for a range of transport choice, which will include walking, cycling and public transport.

Development within the area will have been delivered in a way that will minimise its detrimental impact upon the environment in all of its guises. In particular, new buildings will have been built to high sustainability standards, decentralised low carbon and renewable energy will provide for the energy needs of development, water resources will have been managed to reduce stress upon the water environment and public transport will offer a real alternative to the use of the private car.

Residents will be able to meet their day-to-day needs within their village or neighbourhood. Facilities that need to be used less regularly will be easy to access using a variety of modes of travel. Residents will have the opportunity to

actively participate in the governance and management of their communities.

Objectives

Housing

- 1.** To sustainably deliver 7,000 new homes by 2026, rising to around 10,000 thereafter.
- 2.** Secure sufficient levels of affordable housing for those in need, ensure that affordable housing is tenure blind and of the right type and size to meet demand.

Economic Development

- 3.** To identify suitable areas for employment land as part of mixed use development or as separate industrial estates and business parks.
- 4.** Create links to the key strategic employment sites in the hinterland of the Growth Triangle and in Norwich.
- 5.** Ensure employment growth within the Growth Triangle of a range and type that will give people a choice about where they can seek employment.
- 6.** Provide an environment that will be economically attractive to inward investment, building upon the eco-credentials of the area.

Equity

- 7.** Ensure ease of movement within and between new neighbourhoods and/or villages and into and out of existing villages and the Norwich fringe.
- 8.** Create an environment where integration of existing and new communities can be achieved.

Environment

- 9.** Protect and enhance the quality and distinctiveness of the biodiversity, geo-diversity and landscape of the Growth Triangle.
- 10.** Create a multi-functional network of greenspaces and green links which connect to Urban and Rural hinterlands of the Growth Triangle.
- 11.** Ensure that new buildings and places achieve high standards of environmental sustainability.

Services

- 12.** Provide the services and facilities that will meet the need of the Growth Triangle as it grows.
- 13.** Design the Growth Triangle to allow residents to meet their day-to-day needs within their own village or quarter and create good connections to less regularly used services.

Transport and Connectivity

- 14.** Ensure that it is easy to walk and cycle around the new villages or neighbourhoods, create good links between new villages or quarters and to the wider rural and urban hinterland.
- 15.** Design the area to provide a choice for travel other than the private

car.

Governance

- 16.** Ensure that community assets are governed and managed appropriately to fulfil the needs of residents.
- 17.** Create an environment in which residents can engage with the governance and management of community assets in their villages and neighbourhoods.

Society and Culture

- 18.** Provide the physical linkages that will help integration across the Growth Triangle and with its Urban and Rural hinterland.
- 19.** Create a place which is safe and which feels like it is safe.
- 20.** Create an environment where the facilities and support for healthy and fulfilling living are available.
- 21.** Ensure that places are designed to create a sense of place, balancing the need to preserve existing identities and forging new ones.

- *Principles*

- 16.** It is particularly important that the new communities created have a strong sense of place and are prepared according to coherent masterplans designed to achieve this objective for each of the individual “quarters”.

- *Distinct quarters*

- 17.** The geography of the area, including its constraints and assets, suggests that development will tend to divide into discrete areas. Early development of the proposals for the Eco community as set out in the concept statement submitted to Government in 2009 reinforced the view that the triangle should be designed around separate but linked quarters each having its own identity and local services, and defined by interconnecting green infrastructure. Some high level infrastructure will need to be shared. The current expectation is that there will be two further such quarters to complement the eco community.

- *Landscape structure*

- 18.** The landscape character assessment emphasizes the need to protect, manage and enhance historic parkland and the setting of churches, halls and manor houses as well as maintaining the distinction between existing settlements and the main urban area of Norwich. It is important that these objectives are incorporated with the protection of the existing important assets including trees, copses and woodland, particularly Ancient Woodland, historic parkland and gardens, and County Wildlife Sites, together with the restoration of hedgerows and maintenance of the structure of hedgerow belts. The connectivity offered by hedgerows is an important factor emphasized by the green infrastructure work

already undertaken, and should be reinforced. This will need to include links to existing assets to create “stepping stones” linking those within the urban area to the urban fringe, and the appropriate disposition of both informal and formal open space

19. Priorities for Green infrastructure in this area, defined as a Green Infrastructure priority Area, are set out in Appendix 5 to the Green Infrastructure Delivery Plan
20. The green spaces created should serve a number of functions including formal and informal recreation, biodiversity and sustainable drainage in the form of filter strips, swales and ponds where feasible. Enhanced green infrastructure should also be used to provide a buffer around particularly sensitive ecological areas as well as the creation of new habitats such as heathland, wood – pasture, grassland and woodland. Several existing assets and constraints offer the foundation of a near continuous framework which can be built on, particularly restrictions on development immediately east of the Airport, and the connected or almost connected Beeston Park, Sprowston Park and golf course, Rackheath Park and associated Ancient Woodland. This, together with land forming the landscape setting of Thorpe End, Brown's, Belmore and Racecourse Plantations could form the basis of an extensive network of connected spaces to complement that being proposed in the eco community.
21. These are complemented by land intended to remain open under appropriate management in accordance with existing planning commitments, at Cottage Plantation, Harrison's Plantation and Bear Plantation.
 - *Shared infrastructure/ sustainability criteria including code levels, district heating/local energy generation*
22. Shared high level infrastructure refers to those facilities which require a large catchment population to support them, or where the necessary investment will serve the entire area. In this respect the triangle as a whole will add to the sustainability of the eco community.
23. This will include a high school. Currently, this is expected to accommodate 1400 11-16 places, associated with 280 places for post 16 education. It may also be a suitable location for a swimming pool which is likely to be required late in the plan period and a 4 court sports hall. The requirements of the eco community and the presence of an existing high school at Sprowston suggest this may be best located at Rackheath.
24. Locally generated energy and district heating/cooling systems may be better provided in a centralized form, although a modular approach may be more effective, depending on the phasing of development across the triangle. This will need to be the subject of detailed local

assessment. It is important that energy demands are minimized and the buildings in the area will be expected to comply, as a minimum, with the requirements of the eco towns policy statement within that part of the triangle, and the requirements in policy 3 of this strategy.

25. Co-ordination between the “quarters” will be necessary to ensure the most effective connections by public transport, walking and cycling, to local employment areas including the city centre, urban fringe, Rackheath, Broadland Business Park and the employment opportunities near the Airport. Similarly walking and cycling connections to local attractions including the surrounding countryside, high school, post 16 education and associated recreational facilities will need coordination. This will need particular attention to “permeability” across the northern distributor road. Attention should also be given to the need to improve orbital connections within the area, other than the northern distributor road. The previous local plan promoted a link between the Sprowston fringe and Broadland Business Park, and retention or extension of this corridor, with emphasis on the promotion of non car travel should be given full consideration.
 26. The Norwich Area Transportation Strategy includes proposals for bus rapid transit, including a corridor serving the growth triangle. Full BRT will need to be introduced in stages as the development progresses, but a high quality conventional bus service should be introduced from the first phase of the project.
 27. The Rackheath eco town proposal concept statement includes an aspiration for the provision of a “tram – train” utilizing the existing heavy rail connection to Norwich, but with the capability of “street running” within the new community. This is likely to be dependent on overcoming operational barriers to the use of light rail rolling stock on heavy rail infrastructure. If this can be achieved it should also facilitate the provision of a station to serve Broadland Business Park. These opportunities should be exploited if possible, and safeguarded if not immediately possible.
- *Housing density assumptions/land requirement*
28. The eco community as currently promoted would provide just over 4000 of the 10,000 houses planned and additional employment at Rackheath. Within the remainder of the growth triangle, housing is likely to be constructed at an overall net density of 30 to 35 dwellings per hectare, requiring approximately 170 to 200 hectares of land to accommodate the remaining 6000 houses. However, a range of densities will be expected, with higher densities around centres and locations with particularly good access by non car modes. A further 100 – 110 hectares are likely to be needed for community facilities and recreation to meet recommended standards in this part of the triangle, with additional land required for the expansion of Broadland Business

Park, and for inclusion of some local employment within housing areas as part of a mixed use approach.

- *Housing type and tenure*

29. The housing types and tenures should reflect those needed overall in the strategy area. This will be subject to consideration at the time of development and the most up to date evidence at the time. At present the split between tenures should be 60% market and 40% affordable (of which approximately 2/3 should be social rented) if the housing needs of the area are to be fully met. The proportion of market, intermediate tenures and social rented will need to take account of factors prevailing at the time of development, including viability considerations and the availability of grant.
30. It will also need to take account of the expected ageing population and include lifetime homes and mixed tenure housing with care. A further consideration in meeting the needs of all sectors of the community will be examining the potential for residential sites for Gypsies and Travellers to meet part of the overall need identified in the joint core strategy.

- *Mixture of uses/district and local centres*

31. It is important that masterplans for the area recognize the need for a rich mixture of uses including employment, commercial and community uses close to residential areas where compatible with residential amenity, to help people access services locally, give local employment opportunities, and maintain a level of activity throughout the day. For this reason, district and local centres, schools and community facilities should be located within the “quarters”, rather than at their periphery, unless they are expected to attract large numbers of visitors from outside the growth triangle or from other “quarters” within it. Particular attention in this respect will need to be given to the location of a district centre, and the high school and other facilities such as a swimming pool where access from all parts of the triangle is likely to be critical.

- *Community infrastructure/social/faith/open-space including open space assumptions*

32. This is a large scale development, and it will require significant social infrastructure. Some of this will be shared infrastructure, referred to above but some will be more locally based This will be refined through the masterplanning process but is likely to include
 - 6 Two form entry primary schools, and 1 single form entry primary school, all with associated early years facilities and 2 additional early years facilities

- 2 Primary care centres or equivalent facilities, each for 5 general practitioners and 4 dentists, and expansion of existing facilities to accommodate an additional 2 general practitioners and 3 dentists
- 2 Combined community and library buildings, and 2 further community buildings
- Provision for places of worship/ faith groups, probably through the multi-functional use of community buildings
- A further 4 court sports hall
- Open space in the form of Parks and gardens (approximately 25 hectares, of which at least 15 hectares should be outside the eco community), natural and semi-natural open space (approximately 82 hectares of which at least 49 hectares should be outside the eco community), informal amenity open space (approximately 5 hectares, of which at least 3 hectares should be outside the eco community), provision for children and young people (approximately eight hectares, of which at least 5 hectares should be outside the eco community), outdoor sports and recreation grounds (approximately 37 hectares, of which at least 23 hectares should be outside the eco community), and allotments (approximately 3.5 hectares of which at least 2 hectares should be outside the eco community). Eco community requirements may result in the residual requirement and hence total requirement in each category being exceeded. Similarly, opportunities to exceed the minimum in any one category should not result in a reduction in other categories.
- Emergency services will need to be taken into account. The principal requirements are likely to be facilities for new or expanded safer neighbourhood teams, and consideration should be given to co-locating these with other social infrastructure facilities. It is likely that 3 new safer neighbourhood teams will need to be accommodated, each consisting of 12 – 13 officers, together with expansion of an existing team.

○ *Environmental priorities*

33. Environmental priorities include the minimisation of energy demand, mentioned above, and the need for a reduction in the use and discharge of water. This will require a focus on water efficiency, potentially innovative solutions to the treatment of wastewater and extensive use of sustainable drainage systems. Evidence indicates that the infiltration capacity of surface geology varies across the triangle and the appropriate techniques will need to be the subject of detailed local investigation. This should be seen as part of a strategy to help minimise climate change and adapt to it and should also incorporate appropriate design and orientation of buildings, and their landscaping.
34. In terms of green infrastructure, the priorities have been established through the Green Infrastructure Delivery Plan prepared for the Greater Norwich Development Partnership and with reference to the Norfolk Biodiversity Action Plan which includes species and habitat plans and guidance on how development can complement biodiversity. It is

critical that existing network of green assets is complemented by new green space to encourage continuity of green corridors. It is essential that sufficient attractive facilities are provided to avoid adverse impacts on nearby internationally recognized sites of wildlife importance.

35. The overall principle should be of public transport oriented design with neighbourhoods also designed to be permeable and highly attractive for journeys on foot and cycle,.

36. The cultural assets of the area should be fully recognized in the design and disposition of new development, in the form of designed landscapes, buildings, and evidence of the area's history..

○ *Health, community safety and Community building*

37. A successful community will also be safe and healthy. As well as provision for enhanced safer neighborhood teams, the detailed design of individual areas will need to take account of the need to minimize crime.

38. Similarly, new communities should be designed to promote health. Many of the principles outlined above contribute towards this, including the promotion of active lifestyles as well as primary health care facilities. Health promotion must also be consciously designed into the communities and for this reason it is expected that a Health Impact Assessment will be undertaken on individual masterplans. This should be undertaken in stages including scoping, appraisal, and reporting and should be scoped and undertaken in consultation with NHS Norfolk.

39. A large new development will require help to form a cohesive community, for example through the development of local community groups. Inevitably in the early stages, residents are likely to look to the existing communities, but increasingly the new communities should be able to support groups and societies in their own right. Developers, the District and Parish Councils will need to work together to support this in a coordinated way by enabling facilities to be available and supporting community development initiatives.

○ *Relationship to existing Communities, Directions of growth and phasing*

40. It is important that new development integrates well with existing, but at the same time helps maintain the identity of different places. This will be a matter for detailed masterplanning but the submitted concept statement for the eco community at Rackheath shows development adjoining the existing settlement on its north side. Maintenance of a separate identity for Rackheath will be aided by the the presence of the northern distributor road, but should be reinforced by particular attention to the landscape setting of the expanded community.

41. It is expected that development elsewhere in the growth triangle will pay particular attention to its connections with the existing urban fringe of Old Catton, Sprowston, and Thorpe St Andrew, to enable shared use of infrastructure. In all cases, movement patterns should be designed to avoid subjecting existing or new residential areas to extraneous traffic. A landscape structure built on the foundations of existing assets can help to retain the identities of these quarters within the growth triangle, and also the identity of existing communities such as Thorpe End
42. One priority is to enable an adequate supply of housing land to be maintained to meet housing requirements in the area. Development will need to be phased in accordance with sound practice within each “quarter”, and the provision of necessary infrastructure. Of particular importance will be phasing in relation to the delivery of the northern distributor road, and wastewater transmission infrastructure in the form of a strategic sewer, or other equivalent provision, once capacity in the existing system is used. Existing strategic sewer capacity should be sufficient until approximately 2020/2021.
43. The Northern Distributor Road (NDR) is an integral part of the Norwich Area Transportation Strategy and considered essential to pave the way for interventions to create better conditions for public transport, walking and cycling. It is therefore critical to a commitment to the scale of development proposed, which itself is required to support some of the high level infrastructure essential to the creation of sustainable communities. The NDR is needed now in order to resolve wider transport problems in Norwich; therefore there cannot be commitment to large-scale development in the growth triangle until there is sufficient certainty over the construction of the northern distributor road. In the short term, subject to this commitment, development may commence before the NDR is completed, in parallel with interim improvements for other modes and the delivery of the Postwick Hub Junction improvements. There will be a limit on the number of dwellings which would be subject to the provision of appropriately detailed transport assessments by developers, which would also need to demonstrate investment in sustainable transport modes to minimise their traffic impact.
44. Initial assessments suggest that the short term impact of development in the region of 2200 dwellings may be acceptable in the knowledge that the Postwick Hub improvement will be delivered and the NDR is committed. This figure would have to be justified by scheme specific transport assessments by developers.
45. In addition to the above there is potential to provide part of the proposed Ecotown at Rackheath with an allowance of a further 1000 dwellings here, subject to similar certainty regarding delivery of the NDR. In addition, this number of dwellings would be expected to

demonstrate half the amount of car-based trips when compared to a conventional housing development.

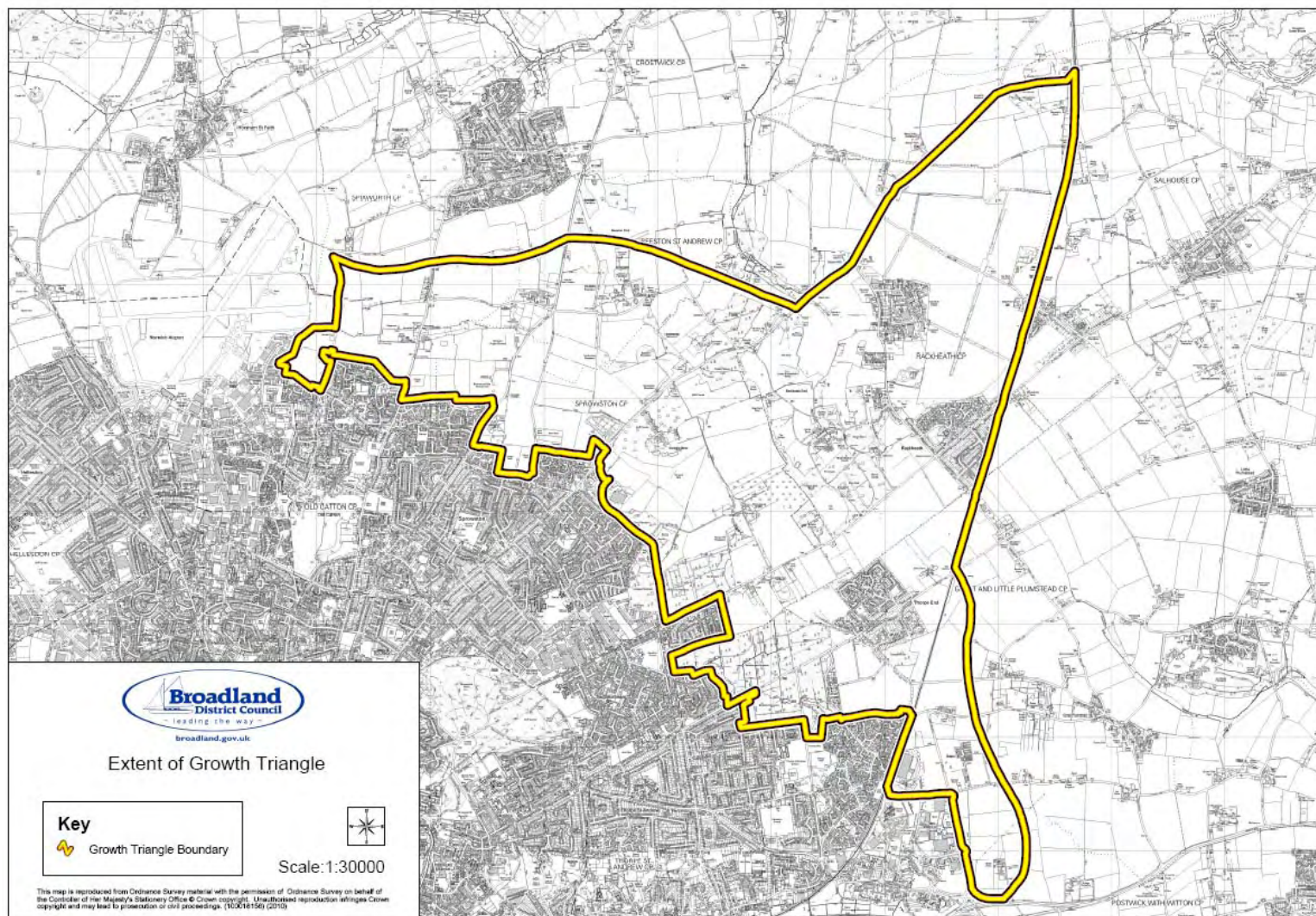
46. In view of the need to deliver dwellings rapidly once the growth triangle gets underway, both to ensure the supply of housing land, and to limit the overall construction period, it is proposed that the development in all “quarters” should progress concurrently.

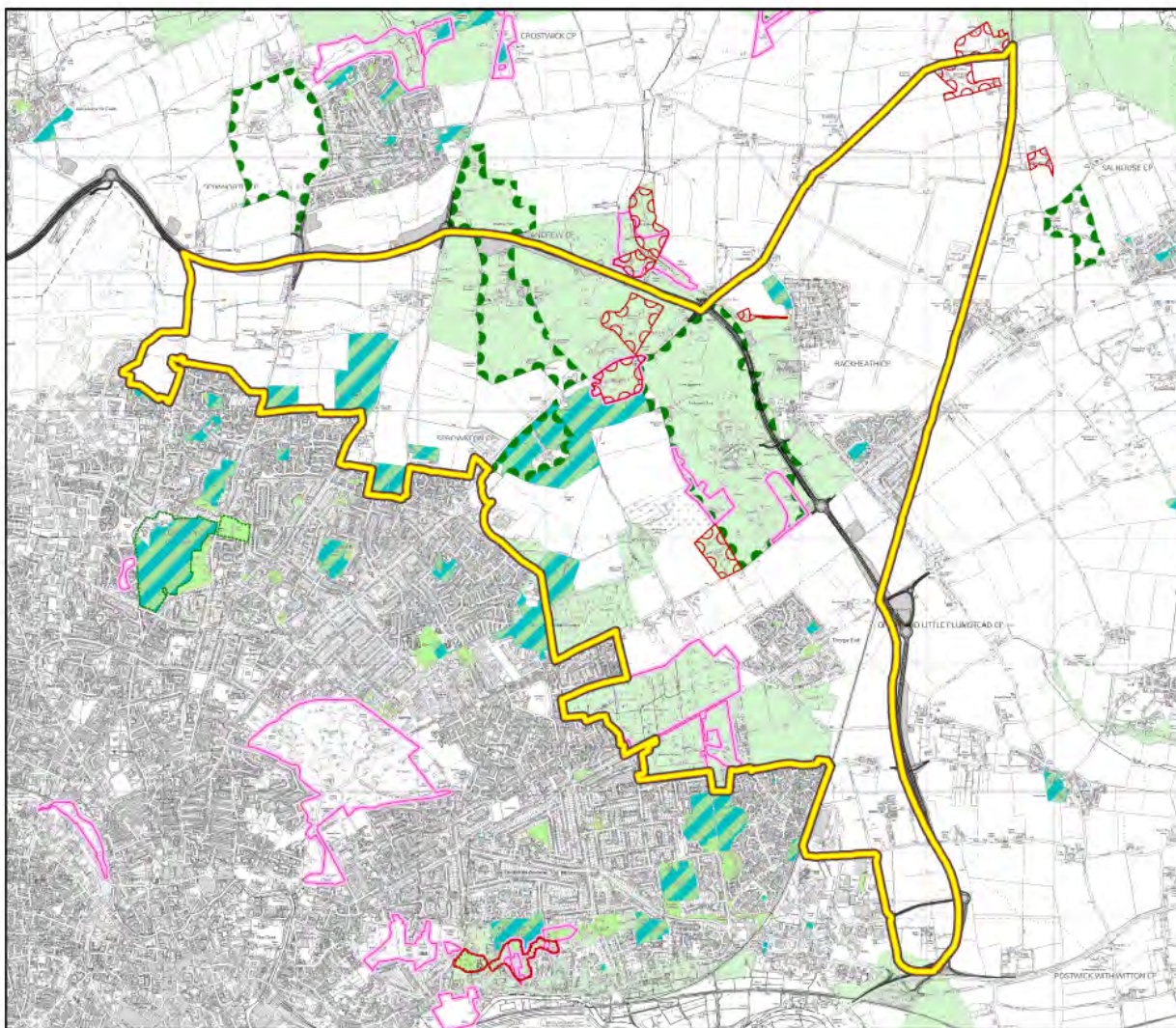
SPD/Masterplanning process

47. Policy 10 of this strategy, complemented by this concept statement including the map showing the extent of the growth triangle, and other illustrative material represent a strategic allocation, which will result in an amendment to the adopted Proposals Map in the Broadland Local Plan adopted in 2006.
48. Further detail of the proposals will be worked out through an overarching high level master plan in the form of a supplementary planning document
49. This will be prepared in consultation with the local communities and their representatives, other members of the Greater Norwich Development Partnership, service providers, environmental bodies, landowning and development interests and the public. In order to guide this process in an open way Broadland District Council has appointed independent consultants to lead the overarching high level masterplan.
50. In view of the significance of the overall development and the sensitivities of the area, this will incorporate Sustainability Appraisal, a Habitats Regulations Assessment and a Health Impact Assessment. Its focus will be on the overall concept, landscape structure and provision of shared infrastructure, including its location and timing, and it will set the framework for more detailed masterplanning to be undertaken for each of the “quarters”.
51. These will be led by the development promoters. The “daughter masterplans” will all be undertaken using a participative process to enable local communities to have a voice in the detailed planning of future development.

List of maps

1. Extent of Growth Triangle
2. Areas of green space
3. Key transport routes
4. Constraints and opportunities for new development





Areas of Green Space

Legend

-  Ancient Woodland
-  Historic Parks & Gardens
-  Outdoor Sports
-  Norfolk County Wildlife Sites
-  Area of Landscape Value
-  Green Spaces
-  Proposed NDR Route
-  Growth Triangle Boundary



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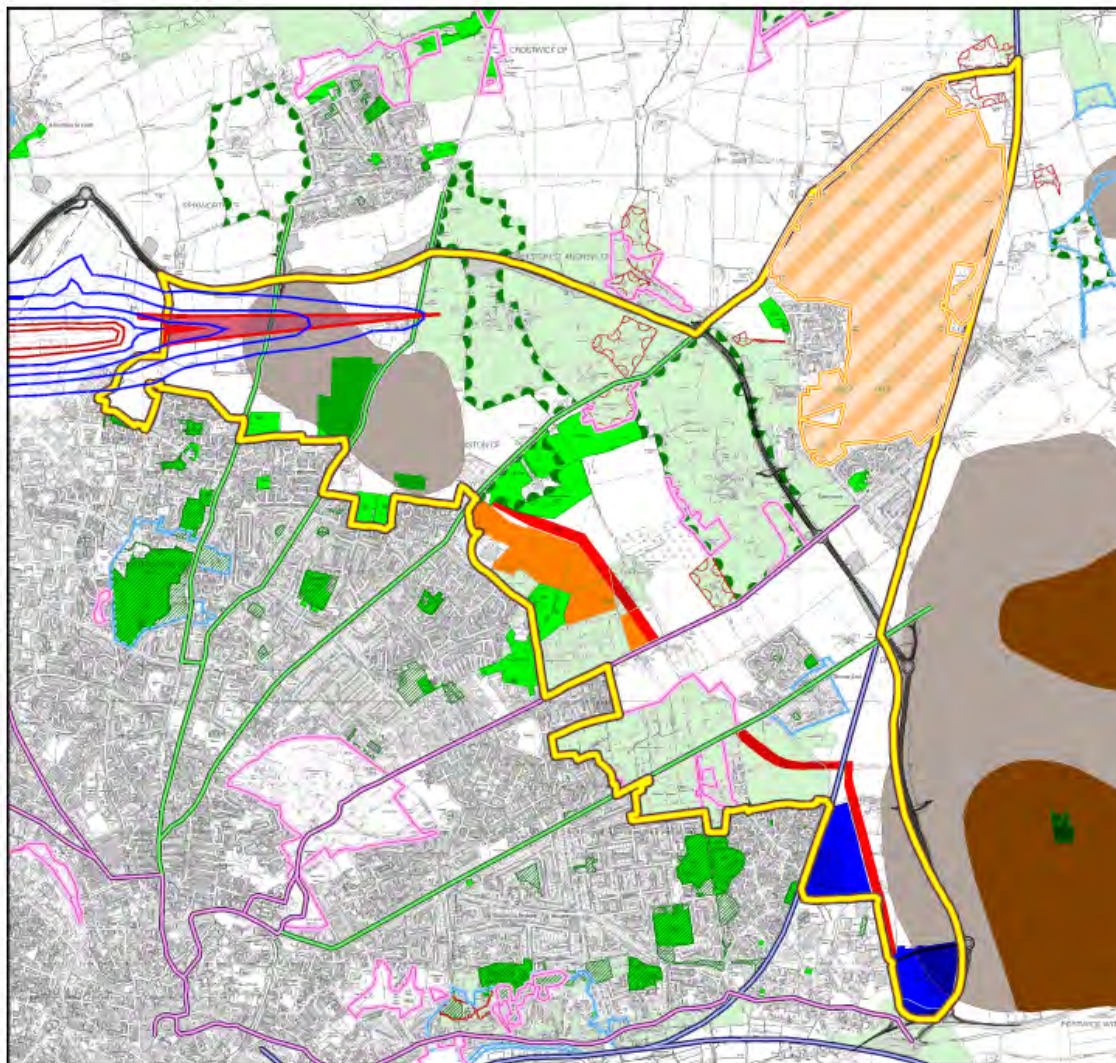
Legend

-  Proposed BRT Route
-  Core Bus Route
-  Possible New Rail Station
-  Existing Rail Station
-  Rail Line
-  Proposed Link Road
-  Proposed NDR Route
-  Growth Triangle Boundary



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Constraints and Opportunities for New Development

Legend

- Proposed Eco-community
- Site Currently Identified for Housing
- Site Currently Identified for Employment
- Conservation Area
- Outdoor Sports
- Norfolk County Wildlife Sites
- Ancient Woodland
- Historic Parks and Gardens
- Area of Landscape Value
- Recreational Open Space
- Agricultural land value 1
- Agricultural land value 2
- Proposed BRT Route
- Core Bus Route
- Rail Line
- Proposed Link Road
- Airport Safety Zone
- Airport Noise Zone
- Proposed NDR Route
- Growth Triangle Boundary



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