

JOINT CORE STRATEGY TECHNICAL CONSULTATION

Response from Norwich Society Strategic Planning and Transport Committee

INTRODUCTION

1.1. Changes to Government planning procedures have forced the Greater Norwich Development Partnership (GNDP) to issue a new document entitled Technical Consultation Regulation 25 (TCR25) on the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk. We feel that the new document does nothing to change the opinions and reservations expressed in our response in February 2008 to the Joint Core Strategy Report (Issues and Options), but the extra information that it contains does require further comment.

1.2. The rapidly worsening national and international economic situation has already made meaningless the assumptions of continued expansion and development on which the JCS is founded. Worries that we expressed in our earlier response have now become major anxieties, and we see no evidence in the new document that the planners are able to even acknowledge the existence of the new realities.

In addition, developments on the ground, in the form of transport infrastructure decisions and piecemeal planning permissions already granted by or in process with individual councils, may have begun to distort and undermine the JCS before it is even formulated. Those details that do emerge in the new document reveal a lack of strategic long-term planning vision that is in danger of producing a badly-flawed and unbalanced outcome for the Greater Norwich area.

JOBS AND THE ECONOMY

2.1. Writing as we do at a time of economic uncertainty, it is essential to realise that such things are cyclical, that after every bust (however long-delayed) there is a boom. But it is already clear, despite Government initiatives on both sides of the Atlantic, that the national economy is headed for a recession of unknown depth and length, and that that considerable section of the economy of Greater Norwich which is heavily dependent on the provision of financial services is bound to suffer job losses and stagnation (if not contraction) for quite a time.

The continued reliance by the GNDP on this sector, on shopping (equally in danger from a recession) and the ever-fashionable but nebulous “media, creative... and information communication industries” [7.2.] to drive the economy of Norwich City Centre is worrying. We also question strongly the confidently-stated prediction that “at least 100,000 square metres of new offices will be required... up to 2021” [7.3.]

2.2. In the light of all this TCR25’s continued insistence on a target of 35,000 *new* jobs by 2021 and sites for 47,500 new homes by 2026 in the Norwich Planning Area sounds like dangerously wishful thinking. In the simplest terms, without jobs there are no people, and without people there are no buyers or occupants for new houses. The JCS has a worrying tendency (shared by many local and national bodies these days) to

be target-driven, and it often reads as if those targets have become more important than reality.

2.3. TCR25 also seems to assume that the primary target of the JCS is to provide houses and that the provision of new jobs is somehow a secondary matter. Certainly it devotes much, much more space to the former. Perhaps this is merely a reflection of misguided central Government directions, but it puts the housing cart before the employment horse. Surely any sensible sustainable development planning starts with the economic driver, with the *location* as well as the numbers of employment opportunities. Housing should then follow, as close to jobs as possible. This will become ever more important in the coming decades, as planners strive to reduce journey-to-work time and match expanding public transport systems with existing and planned communities.

TRANSPORT INFRASTRUCTURE

3.1. This brings us to the first major threat to a sensibly-designed Joint Core Strategy – the fact that building the Norwich Northern Distributor Road (NNDR) appears to be predicated on major housing development to the North and East of the City, and vice versa. The one seems to depend on the other. Every one of the three options on locations for major change and development in the NPA includes 6,000 houses in the Sprowston/Rackheath area “*rising to a total of at least 10,000 dwellings after 2026*” (our italics). We note that Broadland District Council has recently granted planning permission for 1,200 dwellings in the area, already creating facts on the ground.

3.2. We agree that the NNDR is vitally needed to take traffic out of the congested Northern part of the City (though Norfolk County Council’s failure to secure its continuation beyond the A1067 to the A47 makes it something of a Road to Nowhere, negating its major function as a through route for heavy traffic bypassing Norwich). But as we argued in our previous response, the preferred direction for jobs and housing expansion should be to the South, along the best available road and rail transport corridors (the A11 and the Norwich-Cambridge line, and the A140 and the Norwich-London line).

The most efficient and also the environmentally-friendly way to develop is towards Cambridge and Ipswich, along the developing hi-tech corridor which hopefully will stretch between and beyond the Norwich Research Park and the Wymondham/Hethel advanced engineering complex. If the price of funding the NNDR and its A47 junction at Postwick was to build a major settlement on the wrong side of the City (as TCR25 recognises – “Delivery is dependent on the implementation of the NNDR” [Appendix 1, P.65]), thereby weakening Norwich’s chances of developing more sustainably to the South, we may have thrown away long-term gain for short-term benefit.

3.3. In our evidence to the Northern City Centre Action Area Plan consultation, we pointed out that the side of Norwich nearest to this major new settlement within the Outer Ring Road is only semi-permeable to traffic already. New developments in and around Anglia Square will make this worse. In the absence of the major infrastructure improvements required to solve this problem (realignment of the Inner Ring Road and building the missing NNDR link between the A1067 and the A47), the extra

thousands of people coming in from the new settlements to the North-East may find themselves stuck on the Sprowston Road for quite a while.

3.4. We note that all suggested options for major growth sites include as a requirement for success the provision of bus rapid transit services for the new communities to Norwich City Centre. Such services seem to be seen as a hopeful alternative to major road improvements. And when all these extra buses eventually arrive in the centre, having traversed the already heavily-used main arteries (there are no proposals for any extra bus lanes along the way), they will put their passengers down... where exactly?

3.5. As the Norwich Society has argued for some years, lack of strategic transport planning by the relevant authority – Norfolk County Council – has turned major parts of the City Centre into an extended bus station, without the necessary amenities (catering, staff facilities, toilets etc) to cope. The new “Bus Station”, though architecturally successful, is in the wrong place (unable to effect transport interchange with road or rail traffic) and too small to cope with anything apart from Park and Ride and long distance services. Any sensible sustainable transport policy is based on the expansion of public transport, particularly bus and coach services, and that expansion will inexorably continue. There is no sign in TCR25 of the major initiatives that will be required to cope with its effect on Norwich City Centre.

3.6. We also note the suggestion of a new rail station at Rackheath, to provide travel-to-work transport for residents of the new community envisaged there. This would make sensible use of the existing line, and would be a useful development in its own right whether the new settlements are built to the North-East or not, but as we have already pointed out above (3.2.), the major existing rail connections run to the South of the City, with a reasonable number of stations already in existence.

GROWTH LOCATIONS

4.1. We have already mentioned our misgivings about the large new development in the Sprowston/Rackheath area (3.1.–3.3. above), permission for a substantial part of which (1200 new homes) has already been granted by Broadland District Council. At the same time, South Norfolk D.C. is in detailed discussions with a developer over proposals for 3,000 houses in Wymondham, and is looking at thousands more houses for Hethersett and Long Stratton (again, as with Sprowston/Rackheath, the latter would be used to justify a road improvement scheme, the Long Stratton bypass, which has been justified in its own right for years).

4.2. Thus there is a danger that the Government-driven rush to find sites for all these new homes, undoubtedly allied to lobbying by developers who already own or have options on the land in question, is leading under-pressure planners to create facts on the ground which may be regretted later. Some of these sites are along the development axis that we recommend above, but each will be developed piecemeal, without reference to any coherent, overall plan.

4.3. As we stated in our earlier evidence to the Greater Norwich Development Partnership, the Norwich Society’s preference from the beginning has been for a large (15,000 homes at least) development to the South of Norwich, with new purpose-built

physical and social infrastructure. Such a nucleated country town would be more sustainable, more eco-friendly and in the long run cheaper through benefits of scale, than the sort of add-on packets of development that the GNDP favours.

4.4. Wherever these new communities are placed, their strategic infrastructure will be costly. This cannot and must be glossed over – pennypinching here will lead to impoverished and unsatisfactory communities in the coming decades. The example of Thetford, where the local community has been struggling with the after-effects of over-rapid and underfinanced expansion for a long time, should be a salutary lesson for all our local planners.

4.5. With this in mind, the suggestion that a large (if as yet indeterminate) part of the infrastructure investment for expansion will be met “through a combination of a community infrastructure levy (CIL) and contributions through planning mechanisms” [9.2.] is both hopeful and worrying. Hopeful, because this seems to express an admirable determination to make developers contribute a proper amount to the public purse in return for the profits made possible by the infrastructure it provides, but worrying because the CIL is (as TCR25 readily admits [p.58, Policy 19]), at the moment merely a Government proposal, and has yet to make it through the parliamentary process. Yet *all* the vital physical infrastructure (schools, libraries, childcare, transport and health, for instance) is expected to be paid for, at least in part, by a CIL [Table 1, Developer contributions, P.62].

What happens if CILs don’t come through? Plainly, the money will have to be found locally, by council tax payers. All we can do is hope that the councils and officers who eventually carry out the Joint Core Strategy use existing powers to extract contributions from developers and from central government to their utmost. The continued absence of a coherent and powerful Delivery Body for the JCS (see below 5.1. & 5.2.) is also worrying here.

REORGANISATION AND DELIVERY

5.1. There is another consultation proceeding in parallel with and overshadowing this on the development of the Joint Core Strategy. It is, of course, the Boundary Committee’s inquiry into the future shape of local government in Norfolk and Suffolk. The planners at present attempting to draw the JCS together may find themselves working for a variety of possible unitary authorities when the time comes to implement it. They may even find themselves exactly where they were before the consultation music started, if the Secretary of State decides to leave things as they were.

5.2. But whatever happens in the New Year, it is still the case (as we argued in our previous response) that development of the size and scope envisaged will need a strong and dedicated Delivery Body to drive it, with the powers and autonomy to insist on best practice in design quality and face down, where necessary, the various developers and sectional interests involved. As yet there is no sign of such a body being even considered. This is a serious omission.

CONCLUSION

6.1. The Joint Core Strategy will come into operation at an exciting and dangerous time. Norwich and its associated communities in Norfolk face expansion at an unprecedented rate, a rate which will eventually produce a conurbation as large as Nottingham. The danger is that that development will be botched. There are already ominous signs (4.1. & 4.2. above) that it could be developer-led rather than planned as a coherent whole.

6.2. It is probable that expansion will not happen at the speed predicted. Given the state of the economy, the targets given our local councils and their planners by the Government are very likely to be over-optimistic. But that is an opportunity which should be grasped by those drawing up the JCS. It gives us precious time. The expansion will undoubtedly come, whether under this Government or another, and any delay gives us in Norwich and Norfolk a better chance of planning robustly and fruitfully for the new communities and the tens of thousands of new citizens who will eventually live there.

6.3. We congratulate the Greater Norwich Development Partnership on the mass of work done so far. Our comments are offered, we hope, in a constructive spirit, with the aim of strengthening the overall planning process and helping it to come to the best possible decisions. This is, after all, too big and important a project to be allowed to fail.

*Norwich Society Strategic Planning and Transport Committee
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