

JOINT CORE STRATEGY CONSULTATION REPORT (ISSUES AND OPTIONS)

Response from Norwich Society Strategic Planning & Transport Committee

INTRODUCTION

1.1. In the next few years the people of Norwich and its surrounding towns and villages face an enormous challenge, one that is already enshrined in Central and Regional Government policy and accepted by all the local councils. Put quite simply, we are being told to accept an expansion in population of the order of twenty per cent in less than twenty years, with the necessary extra jobs, houses and infrastructure.

1.2. As the Joint Core Strategy Consultation Report (JCSCR) points out, by the time the dust settles we shall be living in a conurbation the size of Nottingham. It would not be an exaggeration to say that our communities will have to survive and adapt to the biggest changes they have faced since the Second World War. Many local people may not want this. Most have yet to realise the magnitude of the changes that are coming. But on present evidence they are coming anyway.

1.3. *At the same time*, there is a strong probability that local government in the area will be in a state of turmoil and change. If Norwich's bid for enlargement and Unitary Authority status is successful, it will take several years for new planning structures to bed down and become fit for purpose.

1.4. If our City is to survive this, and prosper and remain a pleasant place to live, high-standard housing, jobs, transport and social infrastructures will all have to be provided at a speed we have not seen in living memory. Unless it is properly handled expansion of this order at the speed predicted could spoil the quality of life in our area for decades to come.

1.5. When it is in place the Joint Core Strategy will have to be able to cope with all of this, and *must* be implemented by a planning team strong enough to resist sectional interest groups ranging through central and local government to site developers. Otherwise we face development on the cheap, stuffing existing communities beyond their capacity to absorb extra people, and threatening our quality of life for a generation.

1.6. The JCSCR is not encouraging. As is the nature of these early consultation documents, it is, in the main, too bland to contain any real meat. Where decisions are tentatively reached - for instance the preference for 3 or 4 large new settlements near Norwich rather than one big one elsewhere (see below, pp.3 & 5) - there is little or no evidence of the basis on which these decisions are made.

1.7. We see no indication of any extensive on-the-ground research, or indeed knowledge of or sympathy for the very special nature of an area as historic and complex as Greater Norwich. Astonishingly, there is no recognition of the fact that the Joint Core Strategy is being drawn up to serve communities with two millennia of growth and development behind them – indeed under their feet, with precious fragments of that history exactly where new homes and offices may need to rise.

1.8. We regret to say that the report shows every sign of being largely an off-the-peg cut-and-paste compilation drawn up to suit the sectional interests of the three councils involved (Broadland DC, Norwich City Council and South Norfolk DC), with a set of Objectives that could apply to almost any mixed urban/rural environment anywhere in the country.

FOUR KEY QUESTIONS NOT CONFRONTED

2.1. Four very large questions are practically ignored. They must all be answered before any sensible future planning is possible. They are:

A. Can the predicted massive and rapid expansion of population and jobs in the Norwich Planning Area (NPA) materialise as expected and on schedule?

B. What sort of transport network will evolve in the NPA over the next decade or so?

C. Why not build a single new community (with advantages of scale, greater energy efficiency and environmental soundness) as focus for most of the expected development, rather than scattering it around in packets?

D. How will the eventual Plan be delivered – will the team charged with carrying it out have the skills and the power to achieve creative and coherent results in terms of the overall planning and design of our new built environments?

A. Population Expansion.

2.2. The JCSCR states [1.3] that the JCS itself has to meet the requirements of the Government's draft *East of England Plan* giving growth targets up to 2026. These involve 33,000 additional homes by 2021 (in just 13 years time!) and 35,000 new jobs by the same date.

2.3. Are these demographic projections still accurate? It is possible, for instance, that they are based on an expected level of economic activity that may not materialise. In the next few years the UK and the world in general certainly face a slowdown, if not the actual recession that many are predicting. Anecdotal evidence (such as an evolving "stickiness" in the erstwhile booming market for new houses and flats in Norwich) increasingly confirms this. And those 35,000 new jobs are crucial to the whole Joint Core Strategy.

2.4. We do not doubt the *eventual* accuracy of these predictions. It is, however, at least possible that we may have more time to plan for the oncoming expansion than we thought: time that could be well employed by getting the eventual Plan *right*. We may not need to start from here in the first place.

B. Transport Network.

2.5. Here again we find a number of questions still being begged. The NPA's poor road systems and indifferent public transport networks are a source of constant irritation to anyone who lives here. Without major improvements the projected population expansion could simply hasten this sclerosis of our major arteries, with a possible total seizure as the eventual outcome.

2.6. Yet the decisions that are needed, by road, rail and even air, are completely out of the hands of local planners (for detailed discussion see below, pp.9&10). The JCSCR evidently realises this, but instead of facing squarely up to the fact that failure by local and national government to deliver the right transport investment should be a deal-breaker – in other words, that we as a community cannot deliver the expansion required without such investment – the report contents itself with a few feeble platitudes.

2.7. *All* our local authorities, MPs and regional planning bodies should tell Westminster with one voice that many decades of under-investment have left us barely able to cope with existing movements of vehicles and people into and within Norfolk, let alone those envisaged in the JCS.

C. Single Growth Point or Points?

2.8. When it comes to “strategies for location” [5.10-5.13], there is an implied preference for three (or four) large new settlements close to Norwich [ref. what planners are already calling the “Blob Map” addendum to p.31]. Why? As far as we can see, there has been no attempt to consider a single, denser satellite conurbation of 15,000 to 16,000 homes, ideally placed somewhere south of Norwich with access to the A11 and A140 and the county's main rail links to Ipswich and Cambridge.

2.9. Such a Single Growth Point could be planned from top to bottom as one of the Ecotowns that the Government is keen to foster. New-build infrastructure is overall cheaper, and can be built to higher ecological standards than that of smaller conurbations plugged onto existing sewage, drainage and power networks. Just as important, high standards of design will be easier to achieve and enforce – the low level of the standard product of volume housebuilders in this area is a constant preoccupation of the Norwich Society's Planning Appraisal Committee.

2.10. It is fair to say that the county's previous brush with a single large development at Thetford half a century ago met with mixed success. But the failure there was overwhelmingly one of lack of investment – in quality housing and in social infrastructure. This time round that mistake can be avoided.

2.11. We develop these arguments further below (p. 5), and make just one extra observation here. Obviously placing a number of smaller developments in packets throughout the NPA will spread future work and revenue (in terms of planning jobs, grants, council tax etc) more evenly throughout the three district councils at present involved in the JCS. Surely such considerations should not guide the most important planning decision to be taken in the county for decades?

D. Delivery.

2.12. The whole question of detailed *implementation* of the JCS is ignored. This is a most serious omission. However good the intentions voiced (and those in the JCS are indeed very good, if vague) the devil in planning delivery is always in the detail. A plan that looks very good in general terms can be ruined by insufficient investment or weak enforcement allowing developers to get away with cutting corners to suit themselves.

2.13. Here the probable changes in local government structure are an additional complication. Even if by some miracle a unitary Norwich City Council was to be up and running within two years, with borders expanded to take in the travel-to-work suburbs, and with a strong team of locally-experienced senior planners in place, a large amount of the development envisaged would still take place outside its boundaries. This would also apply if the decision was made to go for one major new development.

2.14. At the very start of the JCSCR [p. 2] there is a mention of “the team” which consists of the planning policy teams and planning services from the three councils. We also understand that a small joint office and unified computer programmes are already in place. Does this mean that this ad hoc arrangement will continue for the next 20 years? How will “the team” be subject to democratic scrutiny? Will it be capable and strong enough to take and enforce the tough decisions that will undoubtedly be needed?

2.15. Given the current state of planning departments, and the pressures on them, perhaps this is the time to consider setting up a semi-autonomous organisation, subject to proportionate supervision by all the councils involved, to be responsible for planning and commissioning the delivery of growth for the Norwich Policy Area.

2.16. Such a Delivery Body should aim high. It would have the expertise and powers to investigate and commission the range of creative and varied design solutions required for the 21st century. These include:

- new housing types;
- energy-efficient buildings;
- advanced and imaginative architectural design.

2.17. The processes for achieving this would be a major responsibility for the new Delivery Body. It should act as a patron and commissioning organisation, promoting experiment, initiating design competitions and breaking away from the sort of standard estates that most national housebuilders seem to think Norfolk and Norwich need. This is a major opportunity to raise standards of design in our built environment.

DETAILED COMMENT

Sections 1-5

3.1. The most crucial question raised in this report appears to be **where** new development should be located, and **what type and size** of settlement hierarchy is required.

As background, the following figures are quoted for the NPA:

-33,000 additional homes needed by 2021 (then 1800 p.a. thereafter) [5.2].

-Additional land for 23,000 new homes by 2026; out of this total sites for about 5,000 would be identified in the City. As a result “18,000 homes will have to be on Greenfield sites outside the urban area”. [5.3]

-Need for 35,000 new jobs 2000-2021. The report notes that most of the growth is expected in the NPA in existing premises/sites already allocated, or home based. It also suggests that work should be “concentrated in the most sustainable places particularly in the city centre”. [5.7].

Is this a sensible assumption, considering the increasing opportunities for working from home, for home-work units, and the opportunities for and increasing growth in electronic communications?

3.2. The report assumes that “major growth in homes and jobs will be located in or close to the Norwich urban area”. [3.5]. It also notes [3.6] that Norwich should be seen as a green city “in appearance” **[an implication that there should be no tall “landmark” buildings, or towers altering the skyline?]** and also an area with reduced intrusion of traffic by using high quality public transport.

This makes an assumption that the pre-eminent focus for jobs is the centre – without exploring the implications of such concentration in terms of construction.

3.3. Norwich is seen as the “preferred location for strategic growth” [4.4], and a sequence suggested from centre to edge that is “from most to least accessible”.

Again, there is the implication that everything would focus on the centre for the provision of work and the need for accessibility. There should, however, be some more exploration at this stage of the obvious limits to expansion, where it might threaten the urban and historic fabric of the central city area, and of the opportunities to disperse employment.

3.4. When it comes to “Strategies for Location” [5.10 to 5.13], there is an implied preference for three (or four) large new settlements of 5,000 to 10,000 dwellings [5.20; 5.22]. Options for these are indicated on the map [p. 31 addendum], with areas 2, 3a, 3b, 5 and 8 suggested as most possible. A more detailed analysis for each is given in the important Appendix 4 [Pp. 95-100].

What is not considered is the possibility of a more dense “satellite” conurbation, a Single Growth Point for 15,000 to 16,000 homes, somewhere on the preferred axis for both rail and road transport between the Ipswich and Cambridge railway lines and the A11 and the A140. This would place a new community somewhere in the triangle between the A11 and the A140, bounded to the South by the A1066 Diss to Thetford road.

Uncertainties over the final construction of the Norwich Northern Distributor Road (NNDR) and the lack of any timetable for improvements to the A47 on the East and West (see Pp. 9&10 below) make this area to the South and West of the City the only possible location for a new settlement of this size. We have already discussed the *ecological* and *planning* advantages of such a Single Growth Point conurbation above (p. 3).

It would also offer excellent transport and accessibility to the southern arc of Norwich, with its concentration of important facilities and employers ranging from Norwich Union and Marsh, through Chapelfield Shopping Centre, Norwich City College and UEA to the Norwich Research Park (with over 10,000 jobs), County Hall and the Norfolk and Norwich University Hospital.

The Norwich-Cambridge economic axis would be strengthened, linking our City's embryo hi-tech firms and thriving financial sector with the other university city's booming science-based research parks. In support of this we note that the Norwich-Cambridge railway line is already a thriving commuter route, travelling via the cluster of small but vibrant motor research companies that exist around Hethel and Snetterton, and that Wymondham is pin-pointed as a key strategic location for employment growth in the *Draft East of England Plan* [7.12].

Section 6 (Housing)

4.1. This section deals with the type and quantity of housing required in the area up to 2026. We note the statement that "strong planning policies are needed to successfully meet affordable housing need and affordability in general" [6.8], including a mix of tenures (larger developments would appear to be preferable for achieving this).

This concurs with our belief that the strongest possible Delivery Body should be in place as soon as possible (Pp. 3&4 above). One option suggested for affordable housing would be to encourage Housing Associations to manage and be more involved in its provision. As patrons, they could also have an important role in stimulating new and creative architectural designs; there are an increasing number of such schemes as exemplars.

4.2. The question of quality of design is completely ignored, other than that homes should be "planned and built to a design... in line with government policy" [6.6].

Photographs in the report show extremely traditional housing work and leave open this whole area of concern (exemplified by the many mediocre housing developments in progress around the city).

4.3. In the concluding paragraph [6.16], the JCSCR suggests that "a number of strategic sites need to be found and development started without delay".

Won't this undermine a more logical and rational approach to the questions of location and size of any new settlements? As we argue above (p. 2), an economic slowdown may mean we have more time for considered judgement.

Section 7 (Economy)

5.1. We note that the estimate of 35,000 additional jobs in the area between 2001 and 2021 [7.5] is based on a study already three years old – as the JCSCR points out itself, “it is better to treat 35,000 as an indication of the broad scale of growth rather than an exact target”. A new *Employment Growth Study* is underway [7.6].

It is at least possible that the massive growth in predicted jobs driving the entire exercise may be downgraded when this study is published (there is no date given - we suggest it is pursued as a matter of urgency). This is not a reason for complacency. As we accept above (p. 2) expansion on this scale will certainly arrive at some point. It is just that we may not have to start from here, from the assumptions behind the JCSCR, at this exact moment in time.

5.2. Two “key regeneration sites” for employment within Norwich are named [7.13] – the area within the Northern City Centre Area Action Plan (NCCAAP) and the Deal Ground and Utilities Site (DG&U Site).

We have considerable doubts about the potential of the NCCAAP plans for job generation (already outlined in our evidence to the NCCAAP Preferred Options Report). The DG&U Site planning procedure is on hold, pending further investigation of the feasibility of major development on a floodplain afflicted with large amounts of industrial pollution.

5.3. The “historic character of Norwich city centre” as a major economic driver of tourism and its recently-acquired character as a shopping and leisure centre for the entire region are both recognised [7.25 & 7.21-22].

At the same time the city centre is designated by the *Draft East of England Plan* as a key strategic location for jobs growth [7.12], and as “the most sustainable location for intensive office-based employment”. Is there some contradiction here?

5.4. The report notes that Norwich relies too much on large companies and global investment decisions, and that “new business start-up and small and medium enterprise (SME) growth are below the national average” [7.3].

We can find no use in the JCSCR anywhere of the words “factory”, “manufacture” or “industry” (whether heavy or light). A mere half century ago Norwich still had a considerable manufacturing base. The report appears to accept that the economy of Greater Norwich is now driven by office work (mainly provided by those large companies on which the report accepts the City is already too dependent) and shopping.

The crucial business of providing seed-corn subsidy for start-up workshops, of promoting industrial skill bases beyond keyboard-pounding, is completely ignored. The JCSCR makes much mention of training but it seems only to be aimed at office-based workers. The words “industrial estate” have been superseded by the more fashionable “business park”. Yet small to medium enterprises still *make* things. Today’s SMEs are tomorrow’s medium to large employers – and you can grow your own!

5.5. Question 22 [7.15] assumes that (a) identifying additional strategic employment locations, (b) concentrating on bringing forward mixed-use regeneration sites within the City and (c), providing more jobs by removing restrictions on single-use locations like the Hethel motor sport cluster, are all mutually exclusive.

These are artificial distinctions. All three options should be pursued simultaneously. We find it strange that industrial development of any kind should be discouraged anywhere.

Section 8 (Environment)

6.1. Much of this section consists of an unarguable wishlist, backed up by statements so bland as to be meaningless. For instance: “An important aspect of the built environment is the design of development, which is generally addressed through building regulations” [8.17].

It is also limited in scope, ignoring waste issues “as these are covered by Norfolk County Council’s Minerals and Waste Framework” [8.1] or where Government guidance and protection policies are already in place [8.3].

Thus the following apply and are not discussed further:

- (a) Government policy and the Draft East of England Plan [8.3], which require protection of areas designated as of international importance;**
- (b) the Norfolk Biodiversity Action Plan and the Landscape Character Assessment completed for Broadland and South Norfolk [8.4];**
- (c) the work on Ecological Networks and the Green Infrastructure Study in preparation [8.6].**

6.2. Intentions are “to harness the growth that is proposed to deliver an improved environment” [8.2], and that “The level of growth... can be located... to avoid the worst aspects of urban sprawl” [8.5]. Also that “The JCS will need to consider a framework of interconnecting corridors between built-up areas and the open countryside [8.6].

We consider that our preferred solution of a Single Growth Point Ecotown would help both to better deliver an improved environment and avoid urban sprawl (see above Pp 3, 5&6).

6.3. The sections on Flood Risk and Climate Change, Water Efficiency and Heritage and the Environment [8.7-8.16] are not contentious and require no comment.

We would remark, however, that tightening criteria for home insurance following recent inundations may do more to prevent development on flood plains than any good intentions from planners.

6.4. There is some discussion of Sustainable Building Methods, and the best way of achieving these, though the four options proposed lack clarity [8.17-8.23].

All development, whether “housing” or “other types of development” (as referred to in the options) should be, (1) as to housing, compliant with the Code for Sustainable Homes to match Housing Corporation requirements at the time of building and, (2) that in respect of other developments, like conditions should be imposed, so that by 2016 all new build will have to be zero carbon compliant.

6.5. Questions 30 and 31 [P. 34], like so many of those posed for consultation purposes in this document, are no-brainers.

The obvious answer to “Should all types of new development, including business and housing, be required to incorporate an element of sustainable energy where feasible?” and “Would a requirement for each new development to meet at least 20% of energy requirements from renewable sources be a reasonable target?” is “Yes!”.

Section 9 (Transportation)

7.1. This section identifies the main issues affecting Norwich and Norfolk’s failing transport systems. It states exactly why it is important to improve strategic access to and connections within the NPA, i.e.: “A nationwide survey of businesses carried out in 2005 showed Norfolk was the least preferred place for businesses to locate to. The reasons cited all related to accessibility to markets and poor transport links” [9.3].

A recent study published after the JCSCR was drawn up calculates that sorting out just **one** of the area’s major road pinchpoints (by dualling the nine-mile single-carriageway section of the A11 between Barton Mills and Thetford) would generate enormous benefits totalling nearly £800m in terms of productivity, time savings for road users and reduced accidents in return for the £100m the scheme would cost.

The document fails to recognise that completion of this and other vital improvements to the NPA’s transport infrastructure without which the envisaged expansion of population, housing and jobs will be a disaster, is out of our hands, dependent on decisions taken elsewhere. The future plans of key stakeholders like Network Rail and the Highways Agency are not reflected in this document at all.

Necessary schemes include:

Dualling the A11

Dualling the A 47

Building the Norwich Northern Distributor Road (including the missing link between the A1067 and the A47)

Building the Long Stratton Bypass on the A140

Increasing the capacity of Norwich International Airport

Upgrading rail services e.g. to London, Cambridge and the Midlands

Upgrading bus services throughout the area

Delivery of these depends on a collection of bodies ranging from central government through the East of England Regional Assembly and assorted councils to privatised rail and bus companies. None of them except the three councils involved in drawing up this report appear to accept the needs of Greater Norwich as any kind of a priority.

Mention is made in the JCSCR of the need for all these improvements, with an underlying assumption that somehow somebody (in the form of some outside agency) will provide. It must be made absolutely plain to Whitehall that unless most of this wish-list materialises (at an absolute rock-bottom minimum the A11 and NNDR plus big rail and bus improvements) the wished-for expansion cannot go ahead. We urge all the councils, MPs and MEPs concerned to take this on board.

7.2. Norwich International Airport is highlighted as an important factor for strategic access to the NPA [9.4], and is said to be preparing a master plan for increased capacity.

This plan is not yet ready, so is not incorporated in the JCSCR.

7.3. The JCSCR states the crashingly obvious: that “access by rail needs improving”. Increased reliability and better rolling stock on the London line, a half-hourly service to Cambridge and improvements to the Bittern and Wherry lines are identified as particular priorities [9.5].

The two operators in whose hands such improvements largely lie – “One” and East Midland Trains – are not mentioned. The former shows little sign of providing anything more than the present mediocre-to-bad service to Liverpool Street, and the latter has demonstrated that Norfolk’s East-West links are at the bottom of its list of priorities by instantly downgrading its level of service as soon as it took over the franchise in November. We can expect little help here without major pressure from above.

7.4. A number of bus links are identified as already being in place [9.6] – though the most conspicuous success story in this area (the Norfolk County Council-operated Norwich Park and Ride scheme, recognised and much-copied nationally as an exemplar of its kind) is ignored completely.

As with rail, the all-important question of how a group of private operators can be induced to upgrade a very patchy service is fudged, apart from the weak statement that “appropriate investment” would improve matters [9.7]. Park and Ride’s success shows that energetic local authority action can improve matters. This may be the way forward.

7.5. Two major road projects are identified as infrastructure priorities under the Local Transport Plan: the Norwich Northern Distributor Road (NNDR) and the Long Stratton bypass [9.9]. The NNDR is seen as being critical both to planned improvements to bus, walking and cycling in the City and to housing growth to the North and North East [9.12].

The NNDR is incomplete in itself, since Norfolk County Council balked at offending wildlife and green lobbies by extending it over the Wensum Valley from the A1067 to the A47, and will only have limited effectiveness until this is remedied. In the meantime the villages between the two roads will continue to be rat-runs.

Even so, the project has only been allocated part funding for the period beyond 2011 and still awaits approval from the Department of Transport.

Unless and until the NNDR is built (preferably including the missing link) any major growth, like the five proposed small and medium-sized communities on the “Blob” map [addendum to Page 31], to the North and West of Norwich, will be very difficult to achieve. This danger is partially accepted in the report [9.12].

The history of major infrastructure projects in Norfolk gives us no confidence that the NNDR will be completed in time to help the predicted expansion. The Long Stratton bypass, for instance, has been under discussion for decades and as yet has no approval for funding [9.13].

Yet again, crucial elements in the Joint Core Strategy, without which it will fail, are in the hands of bodies beyond control of the councils involved. How will these be delivered? The JCSCR has no answer.

7.6. A number of possible travel initiatives are suggested for the Norwich area and, whatever strategic growth locations are decided, range from dedicated bus corridors and trams to congestion charging. In rural areas and market towns it is undecided whether emphasis should be placed on travel by car or by bus, walking and cycling.

There is no commitment to any of the range of possible solutions, all of which relate to the delicate balance between car and public transport. We see no point in commenting until some preference is indicated as to which the JCS wishes to favour, and to what extent. We note that, in spite of the plethora of no doubt costly studies and plans on this subject in recent years, the planners still seem to have no clear idea where their own personal journey is leading them.

This section alone quotes:

The Local Transport Plan

The Norwich Area Transport Plan

The Draft East of England Plan

The Growth Infrastructure Study

The Regional Funding Allocation

The Accessibility Strategy

But it does not result in any summary of the way forward.

Section 10 (Community Life and Culture)

8.1 This section is full of good sentiments but lacks any proposals for studies to assess the existing situation, let alone ones that would identify solutions to the greater problems that the growth strategy will produce. There is no mention at all of the extraordinarily rich history and landscape which our area is lucky enough to possess. The Broads Authority is not part of the consortium producing the Joint Core Strategy (Why?), and the river valleys in its area as well as those outside are ignored.

Norwich and its surrounding areas have been inhabited from the earliest times – remains left by Palaeolithic man have been found below Carrow Road Football Ground, and the area is liberally seeded with archaeological sites. The area south of the Yare Valley has about the densest occurrence of potential sites of any part of England – the Arminghall Henge, the Bronze Age barrows ploughed through by the Norwich Southern Bypass, the Roman Town at Caister St Edmund and the Anglo-Saxon burial sites nearby are just the tip of the iceberg.

Recent excavations on the Ipswich Road Park and Ride site show that finds are likely wherever you start up an excavator. There must be a major archaeological evaluation of all the proposed sites for expansion – the South East Sector [Site 4 on the “Blob Map”, addendum to P.31], in particular will be full of Roman remains, as it is adjacent to the Roman town.

8.2. Promoting the multi-use of rural buildings is suggested as an option for combating rural deprivation [10.15. See also 13.16-18].

Many of the villages have important buildings that could be used, the most prominent being their mediaeval churches. The Church of England is eager to see them put to greater community use, and the opportunity should be seized. The naves were used as village halls when they were built, and are capable of a range of uses in the future. Many of the non-conformist chapels have found new life as homes, but of those left which are redundant, some could help provide facilities for an expanding population.

Use of churches, chapels and other redundant structures should not be compromised by requiring only reuse close to settlements for easy access. Norwich is a national (indeed international) pioneer in the field of making use of redundant churches, and the experience of the Norwich Historic Churches Trust should be drawn on.

8.3. The section on Culture says that “There are a wide range of actions that will help the cultural sector develop, such as... encouraging the design of new iconic buildings...” [10.5].

Worthy and totally vacuous. There is no mention here of a possible multi-purpose hall (which could be of iconic design) to fill the City’s desperate need for a concert hall. The planned population of 280,000 - the present size of Nottingham - would justify this. As a point of reference, the Royal Concert Hall in Nottingham (part of the Royal Centre) seats 2,499 and stages regular classical concerts as well as other events.

Section 11 (City Centre)

9.1. “Consolidation” of the City centre retail area is seen as a priority by the *Retail and Town Centres Study*, with possible additional capacity being provided by the redevelopment of the Anglia Square area [11.17].

We have stated our worries about the nature of that proposed redevelopment in an earlier document (Norwich Society Response to the Northern City Centre Area Action Plan Preferred Options Report – available on our website at www.thenorwichsociety.co.uk). Briefly, we fear the effect it will have on an already-congested road pattern and point out that it will continue to be severed from the main shopping areas by the Inner Ring Road.

9.2. Expansion and possible dispersal of the late night entertainment area in Norwich City Centre are seen as options [11.14].

This should be resisted. There is already low-level conflict between Norwich’s Night Time Economy (NTE) and the growing numbers of highly-vocal nearby residents living in high-quality refurbishments and new developments. As suggested in a previous Norwich Society report on the NTE (“Riding the Tiger”, 2006) the City Council should consider promoting a Business Improvement District in the late night entertainment area to raise extra revenue to help remove some of the sources of friction.

9.3. New schools accessible to the centre, more open space and better community facilities are named as outstanding needs to cope with expansion [11.17].

We whole-heartedly support this.

Section 12 (Norwich Policy Area)

10.1. The report recognises that it will not be possible to meet all the need for affordable housing within the (presumably present) city boundary. Some would need to be met in Broadland and South Norfolk, and “our current belief is that it would be appropriate to try and meet these needs in the areas closest to Norwich” [12.4].

How does this square with the demand identified for affordable housing in rural areas in the next section [13.9-13.12]? Will such a policy increase population drift from rural to urban areas?

10.2. There is a reference to the possibility of regenerating pockets of deprivation in Norwich through “Densification” [12.5-6].

Presumably this includes demolishing semis and building flats instead for malfunctioning housing estates. While more regeneration projects along the lines of the NELM scheme (the North Earlham, Larkman and Marlpit Lane Estates regeneration programme) would be welcome, particularly in the Mile Cross area, pushing even more housing units into already deprived environments would have to be handled very carefully.

10.3. The creation of “an integrated network of green spaces” is envisaged [12.7], with the entry to different places marked by a distinctive “gateway”, through landscape features or landmark buildings, “probably associated with new development” [12.11].

It is not clear what this means. High-rise buildings at the transition between country and town? Does this refer to the high-rise block of flats planned for the Laurence Scott site or the offices at the Deal Ground and Utilities Site, both at the green gateway between the Yare Valley and the City? We hope this will be made clearer in the Preferred Options document due in June. Norwich is *not* a high-rise City, and its best tall buildings (e.g. the Cathedral, the Castle, and the City Hall) are of such quality and historic value that that any attempt to match them is almost bound to fail.

Section 13 (Rural Areas, Towns and Villages)

11.1. Much of this section falls outside the remit of the Norwich Society. Over 40% of the population in the three districts is beyond the built-up urban area around Norwich. This area contains a wealth of environmental assets, landscapes, wetlands, historic settlements and a series of “vibrant historic market towns”; it is also a major focus for tourism and contains the gateway to the Norfolk Broads [13.1].

11.2. The draft spatial vision aims to promote prosperous market towns and villages, and implies that smaller settlements might become eligible locations for limited growth – e.g. if there is a major development totalling 15,000 to 16,000 homes (our Single Growth Point Ecotown), then clusters of 2,000 to 3,000 could be carefully used to bolster smaller areas.

This would have to be a major responsibility at the local planning level, and would need to be closely integrated with a required provision of rural and affordable housing. Once again [13.12] perhaps the use of housing association clients might provide a very helpful structure.

CONCLUSION

12.1. The Joint Core Strategy Consultation Report notes in its opening words "The next 20 years will change the face of Broadland, Norwich and South Norfolk". Given this onerous remit, we fear that this Issues and Options document has to be seen as over-complicated and produced with, apparently, insufficient local knowledge of the area, its history and landscape. It overlooks difficult issues, makes too many meaninglessly bland statements of good intent, and puts a set of options that are either unarguable or invite a particular set of answers.

12.2. In the pages above we have set out our response to the 13 sections, and emphasised [**in bold**] our concerns and our comments. In addition we have noted (pp.2-4) four key issues that have not been confronted but are central to any proposals. These cover:

- A. **Population expansion**: the implications if predictions slow or prove inaccurate in the mid-term.
- B. **Transport network**: the failure to deliver a proper level of investment would jeopardise the whole plan.
- C. **Location for expansion**: a single Growth Point should be considered and the advantages of such a strategy developed.
- D. **Implementation of the JCS** over the next 20 years: the option for a new semi-autonomous delivery body to be created to act as patron and commissioning organisation.

12.3. This Joint Core Strategy is a crucial document for the future of Norwich, and the present Consultation it is a vital stage in its production. We hope that our comments will be able to make a contribution to a considerable re-assessment before the next Preferred Options stage.

*Norwich Society Strategic Planning and Transport Committee
February 2008*