

**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**



**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 of 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 GNDDP 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