

From: [REDACTED]
To: [Joint Core Strategy](#)
Subject: JCS Consultation
Date: 20 October 2013 21:38:13
Attachments: [REDACTED] [-Note \(2\).doc](#)

Please find attached my comments on the JCS suggested main modifications.

I have set out my comments on the modifications in letter format as otherwise it becomes difficult to follow the line of argument.

The two further attachments are historic correspondence which are referred to in the text of the main modifications letter.

I would be obliged if all four documents were forwarded to the Inspector.

Yours sincerely

Gail

Gail Mayhew [REDACTED]

Part 1. Personal Details

Representations can not be considered anonymously. All representations made will be available for public inspection by appointment, and will be published on the GNDP website. However, this will exclude address, telephone number and email address of respondents which will be used for GNDP purposes¹ only and will be removed from the published representations.

1. Personal Details*

*if an agent is appointed, please complete only the Title and Name boxes in below, but complete the full contact details of the agent in column 2.

Title

Mrs

First Name

Gail

Last Name

Mayhew

Job Title (where relevant)

Organisation (where relevant)

Address Line 1

Line 2

Line 3

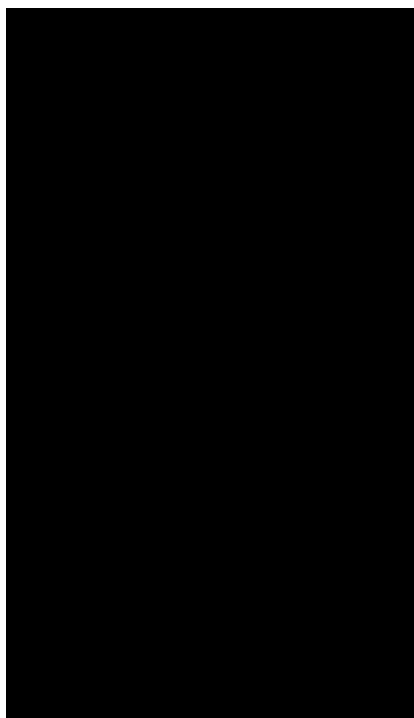
Line 4

Post Code

Telephone number

Email address

2. Agent's Details (if applicable)



¹ The above personal data will be processed in accordance with the Data Protection Act 1998 and will only be used by the Greater Norwich Development Partnership, and its constituent bodies, for the purposes of contacting you about the Joint Core Strategy. It will not be passed on to any third parties.

Part 2a. Your Comments on Legal Compliance

3. Are the Main Modifications to the Joint Core Strategy for Broadland, Norwich and South Norfolk: Broadland part of the Norwich Policy Area legally compliant? (please refer to the guidance notes below for explanation)

Yes

No

No
Comment

Please use the space below to provide more detailed comments:

Part 2b. Your Representation on the Schedule of Main Modifications

Please use a separate sheet for each reference number.

4. Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications in the box below (e.g. MM1). If your comment relates to the Sustainability Appraisal Addendum, HRA Addendum or the Additional (minor) Modifications please state this clearly in the box.:

MM1, MM2, MM3, MM4, MM5,
MM6

Comments without the relevant reference number will not be accepted.

5. Do you consider the Main Modification you have referenced above to be 'Sound'? (please refer to the guidance notes for explanation of the term)

Yes

No

I do not believe
any of these
modifications to
be sound

6. If you consider the Main Modification to be unsound please specify your reason below: (tick all that apply)

A. It has not been positively prepared*

X – not
been
positively
prepared

B. It is not justified*

X – proposals
are not
therefore
justified

C. It is not effective*

X – they are
not therefore
effective

D. It is not consistent with national policy*

Since
government
policy at
present so
lacking in its
definition of
what
constitutes
'**sustainable
development**'
it is likely that
the Sec of
State could
nevertheless
deem the
plans to be in
line with policy
– This is not
the message
on growth that
should be

coming from government.

* An explanation of the Tests of Soundness is provided in the guidance notes.

7. Please give details of why you consider the Main Modification is unsound. Please be as precise as possible. If you wish to support the soundness of the Main Modification, please also use this box to set out your comments.

Please see my letter attached – setting out my view that the proposals are unsound because they are based on an incomplete evidence base.

8. Please use the space below to give details of what alteration(s) to the Main Modification you consider necessary to make it sound and why. Please suggest revised wording.

Please see my letter attached

The Inspector will decide if further public hearing sessions are required as part of the examination process.
All representations on matters of soundness will be fully considered by the Inspector. You may choose to request to appear at a public hearing to clarify your comments on the Main Modifications.

9. Do you consider it necessary to participate at the oral part of the examination? (If reopening the hearing is required by the Inspector)

No, I do not wish to participate at the oral examination

I do not wish to participate at oral hearing

Yes, I do wish to participate at the oral examination

10. The Inspector may hold further examination hearings as a result of the representations. If you wish to participate at any examination hearing, please outline why you consider this to be necessary:

11. Do you wish to be notified of the following? (please tick as appropriate)

The publication of the Inspector's Final Report

please

The adoption of the Joint Core Strategy for the Broadland part of the Norwich Policy Area

please

Signature:

Date:

Gail Mayhew

20th October 2013



Inspector David Vickery

Planning Inspectorate

20th October, 2013

Dear Insepector Vickery

Joint Core Strategy Broadland District Council NEG T

I write in response to the invitation to comment on amendments made to the JCS in response to the legal challenge to this document.

I write in a personal capacity, however have in the past had a professional involvement in the promotion of land in NE Norwich so have a detailed understanding of the various interests involved and the chronology of events relating to the promotion of development within the area.

The process of generation of the JCS has been dogged by a failure on the part of the authorities to **objectively** interrogate the evidence base in defining the approach to growth and the provision of infrastructure. This should be an iterative process that is driven by the evidence that is presented. Instead the obverse has been the case. My observation is that the authority has attempted to shape the evidence base to post-rationalise a case principally for delivering the Northern Distributor Road and have looked for arguments to support housing numbers of a level that enable this proposition.

I would venture to suggest that the various flaws in the planning of the growth proposition within the GNDP area derive directly from this failure of process and that the JCS is systematically tarnished by this approach.

I appreciate that you have found the JCS to be sound except insofar as it attached to NE Norwich and that comments are only invited in respect of this geography. It is particularly because the future geography of this area is so inter-connected with the NDR that the problems with the JCS are most manifest – however there are a range of related infrastructure propositions that flow from this that should be a matter for your consideration.

I would like to suggest that the failure to fully interrogate options that was picked up by the legal challenge, stems from a failure within the dependent Norwich Area Transport (NATS) plan to fully review the range of movement infrastructure options, particularly in relation to the objective of discerning a 'sustainable' approach to managing very substantial population growth.

In particular, the development of the NATS plan:

- a) Did not fully interrogate the potential of rail and light rail to service medium distance and suburban movement into and around Norwich, and in so doing moved too quickly to a movement and land release proposition that is both dependent on and supports the delivery of the NDR.
- b) NATS fails to interrogate the potential of the Inner Link Road which appears in partial form in the Broadland Local Plan, but has not been the subject of full technical due diligence – presumably as there may be a fear that public knowledge of this route would weaken the case for the NDR. (this route was presented by land interests to the inspector at the EIS and subsequently, as deliverable in advance of the NDR, and consequently as a key element of infrastructure in opening up a substantial quantum of development within the NE sector irrespective, or in advance of , the delivery of Postwick Hub or NDR)

Through the failure of parties to fully technically analyse and due diligence the potential rail based movement option, it is clear that the land release pattern that has been promoted in the revisions remains flawed insofar as it does not reflect a genuine interrogation of options whether from a cost/viability perspective; environmental impact or otherwise. Equally, the infrastructure measures which are set out as being essential to support the level of growth have been arrived at without consideration of the rail/light rail based model shift option.

The failure to undertake full technical due diligence of the nature and form of the Inner Link Route mean that the table of growth allocations that is being promoted in the revised document, as potentially deliverable in advance of Postwick / NDR is equally flawed. I was myself in attendance at the EiP when the inspector interrogated the GNDR as to the level of housing that might be released on the basis of this road – unless the work has been done on a systematic basis since, I am not aware of technical modelling of this scenario as having been undertaken. At present the route is being designed by default as a series of estate roads which will inherently undermine the potential capacity of the route; in fact this could be a much more significant and efficacious element of infrastructure if it were designed from the outset as a multi-modal boulevard designed to carry pedestrian, cycle, public transit and vehicle movements in a circular route connecting the Broadland Business Park in the South with the Airport Business Park and Airport to the north.

In order to achieve this multi-mode corridor this needs to be planned and negotiated from the outset; and in order to make the public transport dimension viable, it is equally important that

contingent land use is planned in terms of density and disposition to support the PT option / modal shift potential.

It has been further suggested by rail interests that the PT route could be serviced by light rail as the development is delivered – this would have the advantage of being able to connect onwards through a series of existing North Norwich suburbs and settlements and then could be an environmentally friendly option for creating the full circular movement pattern around the north of the city through the SSSI of the Wensum Valley. This circular movement route would pick up a series of key employment generators and movement inter-changes, namely – Broadland Business Park, Airport Business Park, Airport, and if the extended route were able to be delivered would connect onwards to University of East Anglia/ Norwich Research Park and Norwich & Norfolk Hospital – this could substantially open up access to jobs, healthcare , educational and other opportunities to residents of the North and West of the city.

The updated document acknowledges at Para 7.16:

‘ Pending clarity on Postwick Hub’s and the NDR’s delivery, the table below summarises the current understanding of development potential offered by the strategic locations in the Broadland NPA as at 2013. The delivery of the smaller sites allowance in the Broadland NPA will be dealt with on a site by site basis as the dependence on Postwick junction and the NDR will vary with location’

This position on land release is flawed insofar as it does not take account of either

- a) The local and light rail potential set out
- b) The potential land release that could be opened up via a well designed and integrated ‘Inner Link Road’.

The revised document goes on to state:

‘7.20 Between the original adoption of the JCS and consideration of the remitted proposals, key infrastructure items serving the Broadland part of the NPA were not progressed at the rate envisaged in the original JCS. Because of this, and the further scrutiny of the remitted elements of the plan in the light of updated government guidance about the housing land supply and deliverability of the plan proposals, it was considered necessary to strengthen policy with regard to a positive approach to sustainable development, monitoring and housing land supply. Progress regarding delivery of housing land will be rigorously monitored against targets. If monitoring

reveals that the Broadland part of the NPA will significantly under deliver in terms of a 5-year housing land supply (plus the “additional buffer” required in national policy), then action will be taken to address this as set out in policy 22.)

I would suggest that this is a cop out and that what is required is a thorough and speedy investigation of the alternative infrastructure/land release scenarios couples to discern the optimal growth model in advance of determining any further planning applications. This is tantamount to putting a gun to the heads of those who, at substantial expense and cost in time and with the best interests of Norfolk at heart, have had to bring their views into the public domain via judicial review.

A much better solution would be for the Inspector to require a process of barrister-led mediation to be put in place to draw out the issues and define areas of commonality and difference. This could be supported by the involvement of the HCA TLAS team to rapidly put in place the omissions within the evidence base and testing thereof.

There is currently a substantial pipeline of permissioned land in hand; this is sufficient to respond to current levels of demand pending an optimal growth solution being arrived at.

The document then goes on to set out a revised critical path to the delivery of the infrastructure required to unlock growth in NE Norwich:

‘Appendix 7: Implementation Framework and Critical Path outside of the Broadland part of the Norwich Policy Area

The framework lists infrastructure required to facilitate development promoted in this JCS. It is early work and is not intended to be an exhaustive or precise list of the entire infrastructure that will be needed by 2026. Additional infrastructure will be needed beyond this date, including in the growth triangle where 3,000 dwellings are proposed after 2026. This table was correct at late 2010 and relates only to infrastructure that is not required to deliver any aspect of the plan that was previously remitted. Updated information on the schemes listed is contained within the published LIPP available on the GNDP website. Updated information on infrastructure schemes needed in part to support some element of the previously remitted growth proposals in the Broadland part of the NPA is available in Appendix

7a.

The GNDP will manage a delivery programme supporting the implementation of this Joint Core Strategy. The programme will be developed through the Local Investment Plan and Programme (LIPP). As decisions are made locally and nationally on prioritisation and funding of infrastructure, the content, phasing and priorities of this list will be amended accordingly. This will happen via the LIPP process which will be subject to regular review.

The definition of the three levels of priority is derived from the Greater Norwich Infrastructure Needs and Funding Study (INF 1; in particular see Page 194) but expands the Study's definition to explicitly recognise the differential impact on the overall strategy. Consequently, the 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 and green infrastructure requirements from the Habitats Regulation Assessment. 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 the associated package of 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 ‘

The infrastructure proposition set out as ‘required’ to unlock growth in this document is flawed in two ways:

- a) As the process of evidential interrogation set out above has not taken place, it is impossible to comment on whether the infrastructure list that has been present is in fact the correct list

required to support 'sustainable growth'. It is therefore unsound as it is derived from an unsound and incomplete evidence base.

- b) What in fact is cited is a wish list of city wide infrastructure proposition. The list fails to either interrogate and set out the specific local infrastructure that is required to unlock sustainable growth within the NE sector. It is therefore unsound, again on the basis that the evidence base is incomplete and therefore flawed.

Had the generalism of a rail/light rail based infrastructure / land use scenario been tested, and entirely different set of strategic infrastructure priorities may have emerged. Equally, had the potential of the 'Inner Link Route' been fully technically due diligenced and modelled as a multimodal corridor, a different set of infrastructure proprieties may have emerged.

The failure of the authority to properly grasp the scale of local infrastructure required to unlock growth on the scale that is being promoted by them, has been the subject of ongoing dialogue and is highlighted by the infrastructure requirement set out.

I attach for reference my submission on the CIL consultation.

I further attach a link to the planning documentation on the 7,000 house Sherford Urban extension which you may be familiar with to set in contrast with what has currently been planned and provided for in NE Norwich. <http://www.redtreellp.com/planning-application-2009.asp>

I have raised the absence of detailed work on planning and delivery mechanisms of the 'joined up' aspects of the NE Growth area with Broadland District Council since autumn last year when I approached the Chief Executive on this point. There has been a well documented omission to consider flood risk and water management in the area: equally the opportunity has not been taken to consider a joined up approach to either energy, waste ; the disposition of micro land use to support walkable neighbourhoods nor green infrastructure across the piece. In consequence a series of planning permissions have already been awarded which are sub-optimal and do not consider the wider area infrastructure and potential deliver mechanisms requirement in full.

Please see my letter to the Leader of the Council setting out these concerns the day before the Beyond Green application was determined.

In conclusion, I do not believe the amendments make the plan sound in its current form.

There has been a fundamental failure to interrogate the evidence base which has led to unsoundness in decision-making. This needs to be cured by going back to the point in plan where the failure of interrogation took place – namely in the movement option planning within the NATS study. It is imperative that the two areas of omission in interrogating an optimal movement scenario highlighted earlier, are properly interrogated and presented to the public as options. The appropriate land release model will flow from which movement scenario is deemed to produce and robust, resilient and sustainable solution for Norwich and Norfolk.

Equally full consideration of the local infrastructure requirement to underpin substantial new growth in NE Norwich should be conducted, together with a delivery model expeditiously.

I would further suggest that the failure of the authority to take on board legitimate public and professional opinion throughout the generation of the JCS has led to a fundamental breakdown in trust, and has damaged the credibility of the planning process. I suggest that this should be regarded as a matter of seriousness, and that measures should be put in place as a matter of urgency to restore public faith in the process.

I have suggested elsewhere in this document that a process of barrister led mediation be put in place to remove the need to resort further to adversarial process. In order to move speedily to a deliverable infrastructure and delivery solution HCA ATLAS should be engaged to undertake the work to cure the evidence base so that the public can have faith that this is being conducted objectively; and then should be requested to negotiate a delivery mechanism for an area wide infrastructure provision and delivery mechanism which is presently lacking.

Yours sincerely

Gail Mayhew

Gail Mayhew

[REDACTED]

[REDACTED]

Phil Morris

GNDP

C/O Broadland District Council

Dear Phil,

Please see below my comments on the proposed CIL Levy.

1. While appropriate to ensuring a fair and transparent charging regime that ensures that schemes within an urban area share equally in the cost of collective infrastructure provisions to support growth, the CIL mechanism has a number of fundamental flaws in its application to large scale urban extension.
2. Whereas in an established urban area, sites tend to benefit from existing historic investment in infrastructure (roads, schools etc – even when sites are large scale brownfield or regeneration areas) and key additional infrastructure to unlock growth can be relatively easily identified, quantified and an appropriate tariff set; the opposite is the case in a major urban extension.
3. In the case of an urban extension scheme, typically almost every category of infrastructure needs to be provided within the scheme in order to unlock the site and create an adequate level of amenity.

It has also been demonstrated (*Valuing Sustainable Urbanism, Savills & The Princes Foundation for the Built Environment 2007*) that the delivery of such infrastructure beneficially impacts on land values, however over an extended period.

4. A rigid charging and delivery regime such as is anticipated by the GNDP has insufficient flexibility in terms of phasing, procurement and delivery to support the delivery of the infrastructure required within a major urban extension.

5. Area of Benefit / Hypothecation

The CIL mechanism, as anticipated by the GNDP, effectively severs the link between land/property taxation and 'area of benefit' and will allow the delivery body absolute authority to prioritise the delivery of infrastructure across the wider charging area.

This regime should not apply to the delivery of complex development scenarios such as the North east Growth Triangle which have a sufficiently intensive infrastructure requirement as to require the hypothecation of revenues raised within the local area to the local infrastructure requirement.

A locally operated CIL could potentially be a workable mechanism, on the other hand.

This would require genuinely strategic unlocking infrastructure projects, such as for example an intensification of the Bittern Line Rail Service; an intensification of the Norwich-Cambridge Link; major new green infrastructure for city-wide benefit to be charged through another mechanism – potentially a Tax Increment Finance measure which might apply to investment as well as to development property.

6. The CIL mechanism anticipates placing infrastructure delivery in the hands of the charging/delivery body. This raises questions around value for money procurement, phasing and alternative funding models.

Value for Money

Public procurement routes do not necessarily produce the most cost effective provision of a given piece of infrastructure. This raises the question of whether the role of the charging/delivery authority should be to procure infrastructure or to monitor its delivery, potentially by commercial land / property /infrastructure interests.

Phasing

There may be a conflict between the delivery authority's views on the phasing of infrastructure (particularly a body covering a wide geographical area) as compared with that of land developer or locally based delivery agency or partnership. Whereas within a single urban extension, careful infrastructure phasing will closely ally the infrastructure investment to the creation of land value/amenity and the unlocking of the development on a phased basis; across a wide geographic area where very large strategic infrastructure projects are planned for, the prioritisation may be driven by other imperatives and may become politicised.

Account also has to be taken for demand and value to be created within a site, such that a given piece of infrastructure becomes viable. Sometimes an incremental approach to the provision of such infrastructure can be adopted, eg co-occupation of flexible buildings by different community uses prior to the construction of bespoke buildings. Flexibility should be built in to charging and delivery practise to support this.

Alternative Public Sector Funding Models

The lack of flexibility of the CIL makes it incapable of embracing alternative funding models that are rapidly emerging in many areas of the public and private sectors. For example, in education, DFE is forging a rapidly moving agenda on alternative funding models for schools – this needs to be taken account of. Equally, as new delivery mechanisms are being forged for a range of social services, flexibility should be maintained to respond to this changing environment.

Contribution in Kind

In some cases developers may wish to provide certain elements of infrastructure as part of the value creation in their own scheme. CIL does not provide a mechanism for recognising private sector delivery of elements of infrastructure – this should be addressed.

Equally the CIL makes no provision for reimbursing nor recognising the contribution of land that services the infrastructure provision eg. to accommodate public uses, parkland. This should be addressed.

7. New Residential Funding Models

Within the property industry, strategic residential development practice is rapidly evolving. The government has been keen to support the emergence of the rented property sector; equally there is increasing evidence of investment activity in strategic land, with the potential for the emergence of investment backed strategic land vehicles with an appetite for the delivery of fully serviced sites. The CIL mechanism potentially will operate to inhibit the emergence of these new approaches unless sufficient flexibility is built in.

8. Risk Management / Driving Efficiencies

While there is a need to embrace growth in order to restart the economy, it must also be recognised that it may take many years for the property market to re-establish high levels of demand, sufficient to pay for major strategic infrastructure. In such a climate, efficiencies in delivery and the optimisation of historic and current infrastructure spend should be to the fore to enable development to progress. This argues for:

- a) Utilising existing infrastructure as far as is possible (infrastructure efficiency)
- b) Optimising the use of land that is already served by infrastructure (landuse efficiency)
- c) Considering minimum additional infrastructure requirement to unlock sites and phasing this carefully to produce added land value; (capital efficiency)
- d) Maintaining local control over additional infrastructure requirement such that prioritisation can be influenced;

- e) Prioritising infrastructure and land use patterns that minimise trip generation, vehicle miles travelled and encourage modal shift. (energy efficiency)
- f) Reducing carbon emissions, and optimising other resources.

In conclusion, while the GNDP CIL may be an appropriate charging mechanism to capture value across a range of diverse and relatively small scale sites, the points made above argue that it has the potential to undermine effective delivery of large scale urban extension.

Instead, for such urban extension scenarios, a local charging mechanism to underpin the delivery of collective infrastructure within the scheme should be put in place, with much higher levels of flexibility to encourage and allow for alternative funding mechanisms to emerge.

Yours sincerely,

Gail Mayhew



Cllr Andrew Proctor

Leader

Broadland District Council

24th September, 2013

Dear Andrew

As you know I am no longer involved in the promotion of the Thorpe & Felthorpe land and make the following comments on an independent basis, as a resident and as a professional involved in the promotion of good planning and development practice.

I gather that the Beyond Green planning application is due to be determined tomorrow. This is a surprise as I made extensive representations on the application. It is extraordinary that your officers did not consider it appropriate to inform me of the date of the committee.

I have therefore been denied the chance to make representations in person at the planning committee which is unfortunate as the issues at stake are important ones which will have a strong bearing on the future of the city and county generally.

For this reason I am writing to you directly as the Leader of the Council under whose watch this critical decision is being taken.

I and others have written extensive representations to the authority as part of the AAP consultation, and in response to the Beyond Green application (and elsewhere) expressing concern that various aspects of the infrastructure that will be required to support a genuinely sustainable approach to the extension of NE Norwich have not been addressed at this late stage, either at a technical level nor in terms of delivery mechanisms.

Specifically, the following points have been raised.

- There has been a failure to undertake technical due diligence to produce an optimal route for the Inner Link Route, considering land allocation issues to ensure that this might operate as a viable public transport corridor. In spite of successive consultant and private land owner recommendations, this has emerged in a haphazard way as a series of disconnected estate roads – this is simply not good enough.

It is contrary to the public interest to allow a major route to be developed in such a fashion. This route requires full scale design to optimise its functionality as a multi-modal route carrying pedestrians, cycles, cars, buses and potentially, in the medium term, to become a tram route that could connect the economic hubs of the Broadland Business Park in the South with the Airport & Business Park in the north. Without such a technical analysis having

taken place and having been fully thought through and costed, Broadland District Council are in no position to determine a planning application of the order of magnitude that Beyond Green are currently seeking.

- The absence of technical/feasibility work on the potential of local rail (Bittern Line) to support a commuter (min 30 min service) and sustainable movement/land-use pattern; and consequent consideration of land allocation, costings, s106/CIL impacts. (this ought to include consideration of the potential of 'parkway' stations that would enable people to leave their cars at some distance from Norwich).

This work should be done in advance of a major allocation, as the work has potential implications for sustainable land allocation and the prioritisation and location of infrastructure.

- Insufficient technical analysis has been undertaken of cross-site infrastructure – water, waste, energy, green infrastructure – and how this might be funded, with insufficient consideration of how delivery mechanisms might be established - including the exploration of potential for creating income generation through a MUSCO ; equally there has been a failure to resolve an equitable approach to land values and the pooling of land interests to support the optimal location of community assets and infrastructure.

As the strategic servicing of the sites within the NE sector remains un-resolved –the granting of a major allocation without having undertaken this work would constitute a dereliction of duty to the general public, the tax payer and property owners/residents/businesses in the area.

- Insufficient consideration and analysis has been given to the optimal location and configuration of public facilities / commercial servicing so as to support a walkable footprint / encouragement of sustainable movement patterns.

This will lead to a poor quality environment and compound poor movement patterns that currently characterise the Broadland fringe– largely because these exercises have not been done in advance of development in the past.

- Insufficient consideration has been given to the underlying economic proposition for the growth area – on an ongoing basis there has been a failure on the part of the authority to consider the underlying economic proposition to support growth of the order of magnitude proposed, and in particular the role that the Broadland business parks have to play in targeting and securing inward investment. There is insufficient employment in Norwich and Norfolk as it stands – simply creating residential capacity will do nothing to create a balanced economy.

Equally in local terms there has been a failure to fully interrogate how land use planning at the Broadland Business Parks could provide a local 'town centre' – especially given the circa 4000 existing daytime population and under-served neighbouring resident populations, and how this should impact on the allocation and development model for the NE growth area.

- Insufficient consideration has been given to the highly sensitive setting of the wider NE Sector development area forming as it does the interface between NE Norwich and The Broads. You have the opportunity to create a development scenario that is of great intrinsic quality – instead you are currently throwing this opportunity away through a failure to properly address the technical issues with insufficient cross site masterplanning.
- I send a link to a well-conceived urban extension on the edge of Plymouth. You should note the very high level of technical detail that was required to be in place – much of which was produced on a partnership basis between the authority and the promoter and with the FULL engagement of local stakeholders. <http://www.redtreellp.com/>

On the basis of the information/ technical deficit outlined in the foregoing, I suggest:

- a) It would be irresponsible of the authority to determine the application at this stage without proper technical and delivery due diligence having been undertaken across the various heads identified;
- b) The failure of the evidence base provides a totally unsatisfactory basis for determining a s106/CIL arrangement.

The on-going resistance of the authority to acknowledge legitimate public and professional concerns has already exposed it to litigation and delay – which are detrimental to public confidence and are a cost to the public purse.

I suggest that the only reasonable course open to the authority is to turn down the application, or postpone determination of it until these proper studies are complete.

I further suggest that in order to achieve a rapid resolution of technical matters and in order to restore public confidence, a process of barrister-led mediation is embarked upon, supported by the involvement of the HCA ATLAS team who are experienced in structuring large scale projects and the appropriate delivery mechanisms.

Due to the fact that I was not made aware of the timescale of the planning application I have been forced to write this letter at the 11th hour and have not had the chance to speak to you or your team about these matters in person.

Please be aware that I will take these issues up with DCLG and elsewhere if necessary as I believe the people of Norwich and Norfolk deserve better than the hand they are currently being dealt. You have a great opportunity to build an extension to Norwich of great potential value and attractiveness. I would urge you not to throw away this opportunity in a precipitous dash to award permissions. You should take the lead at put a sound processes in place, to produce a technically superb piece of urbanism.

Yours sincerely

Gail Mayhew

Cc .

Phil Kirby, Broadland District Council

Cllr. Paul Carrick, BDC

Cllr Stuart Clancy, BDC

Cllr John Fisher, BDC

Cllr Roger Foulger, BDC

Cllr Shaun Vincent, BDC

June Hunt, Clerk to the Town Council, Sprowston