

**CAMBRIDGE LOCAL PLAN AND SOUTH CAMBRIDGESHIRE
LOCAL PLAN EXAMINATION IN PUBLIC**

MATTER 5

INFRASTRUCTURE / MONITORING / VIABILITY

APPENDIX 1

PREPARED BY

NICK ANDERSON AND ALEX KEENE (AECOM)

Contents:

Page 1 - Table 1: Journey to Work Statistics (Resident Population – 2011 Census)

Page 1 - Table 2: Journey to Work Statistics (Workplace Population – 2011 Census)

Page 1 - Table 3 – Transport Infrastructure Costs identified in 2013 Infrastructure Study Update

Page 2 - Table 4 – Strategic Housing Allocations Transport Infrastructure Cost per Dwelling (Private Funding)

Matter 5 – Appendix 1

Table 1: Journey to Work Statistics (Resident Population – 2011 Census)

Area	Car Driver	Car Passenger	Public Transport	Bicycle	On Foot	Other	Total
Trumpington Ward	36%	2%	15%	30%	16%	2%	100%
Cambridge	34%	3%	12%	32%	17%	2%	100%
South Cambridgeshire	69%	4%	9%	9%	7%	2%	100%

Source: www.nomisweb.co.uk – 2011 Journey to Work Census Statistics

Table 2: Journey to Work Statistics (Workplace Population – 2011 Census)

Area	Car Driver	Car Passenger	Public Transport	Bicycle	On Foot	Other	Total
Trumpington Ward	49%	4%	17%	20%	9%	1%	100%
Cambridge	50%	4%	13%	22%	10%	2%	100%
South Cambridgeshire	75%	5%	4%	7%	7%	2%	100%

Source: www.nomisweb.co.uk – 2011 Journey to Work Census Statistics

Table 3 – Transport Infrastructure Costs identified in 2013 Infrastructure Study Update

Total Cost	Public Funding	Private Funding	Funding Gap
£807,900,000	£30,000,000	£471,600,000	£306,300,000

Source: Derived from Cambridge and South Cambridgeshire Infrastructure Delivery Study Update (Final Report . Amended) 2013

Table 4 – Strategic Housing Allocations Transport Infrastructure Cost per Dwelling (Private Funding)

Development	Unit	2011-2016	2016-2021	2021-2026	2026-2031	Total 2011-2031	Post 2031	Total
Bourn Airfield / West Cambourne	Dwellings	0	500	1,300	1,100	2,900	1,800	4,700
	Transport Infrastructure - Private Funding	£0	£45,000,000	£52,000,000	-	£97,000,000	-	£97,000,000
	<i>Cost per dwelling</i>	-	<i>£90,000</i>	<i>£40,000</i>	-	£33,448	-	£20,638
Waterbeach	Dwellings	0	0	0	1,400	1,400	6,600	8,000
	Transport Infrastructure - Private Funding	£0	£0	£348,000,000	0	£348,000,000	£0	£348,000,000
	<i>Cost per dwelling</i>	-	-	-	-	£248,571	-	£43,500

Source: Derived from Cambridge and South Cambridgeshire Infrastructure Delivery Study Update (Final Report . Amended) 2013

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MATTER 5

INFRASTRUCTURE / MONITORING / VIABILITY

APPENDIX 2

SUBMITTED BY

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Contents:

**Page 1 – Email correspondence with Cambridgeshire County
Council related to City Deal.**

Ian Reilly

From: Blowers Aaron <Aaron.Blowers@cambridgeshire.gov.uk>
Sent: 10 July 2014 15:05
To: Ian Reilly
Cc: Thomas Graham
Subject: Greater Cambridge City Deal

Hi Ian, thanks for your email and call, and sorry to take a few days to reply to you.

It sounds like you may now have found the deal document online, but in case not here is the link:
<https://www.gov.uk/government/publications/city-deals-greater-cambridge>

The lack of further information on the triggers is a result of these still being refined – we are in the process of discussing with Government what the triggers for 2019 and 2024 are to look like in detail, and hope to bring these discussions to a conclusion over the next few weeks (although it could take longer). The 2019 review is likely to be lighter touch in terms of demonstrating economic growth, given the difficulties in demonstrating tangible economic benefits over the course of one or two years after the first schemes open (if that), but we are expecting to need to establish some form of counter-factual to be used for the 2024 review and an associated metric. This will involve working with academics once the scope is further defined.

There is no cause for concern around the links between the triggers and the emerging Local Plans. The deal has its own objectives, which the triggers will be aligned with, so those are what the reviews will be based upon rather than those in the emerging Local Plans. These overlap significantly at the moment, but if the objectives of the emerging Local Plans are to change through the inspection, etc. then this would not necessarily have any impact on the triggers for future City Deal funding. I don't envisage a situation where the lack of an adopted Local Plan results in a freeze in infrastructure funding – these are separate (although related) issues. We need to agree a programme of investments for the first five years of the deal period (2015-20) in order to start delivering projects as soon as possible, so those decisions will be taken before the Local Plan inspections.

On your question around plugging the infrastructure gaps identified in the draft joint infrastructure delivery paper, I don't know the answer to that as I'm not familiar with that paper. However, if the existing infrastructure delivery study for Cambridge and South Cambridgeshire is taken to represent the infrastructure gap, then no the entire quantum of City Deal funding will not plug the entirety of that gap. The rationale for the funding mechanism relates to the strategic funding gap that exists in Greater Cambridge, therefore this funding is additional to developer contributions and other funding sources (it's important to emphasise that this is not funding to reduce the need for developer contributions).

In terms of the availability of desirable land, this is probably more of an issue for individual clusters, however everything we've heard from the business community has demonstrated that there is substantial constrained growth demand in the area that can be unlocked if the strategic funding gap can be plugged – whether that be in terms of cluster-cluster links, cluster-residential links, or other sorts of links.

I hope this answers your questions. If there are any more please do let me know.

Regards,

Aaron Blowers
Project Manager (Greater Cambridge City Deal)
Cambridgeshire County Council

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Contents:

**Pages 1 to 14 – High Court Judgement – Heard v Broadland District
Council, South Norfolk Council, Norwich City Council**

Heard v Broadland District Council, South Norfolk District Council, Norwich City Council

Case No: CO/3983/2011

High Court of Justice Queen's Bench Division Administrative Court

24 February 2012

[2012] EWHC 344 (Admin)

2012 WL 488666

Before: Mr Justice Ouseley

Date: 24/02/2012

Hearing dates: 6th and 7th December 2011

Representation

Mr R Harwood (instructed by Richard Buxton Solicitors) for the Claimant.

Mr W Upton (instructed by Sharpe Pritchard Solicitors) for the Defendants.

Judgment

Mr Justice Ouseley:

1 The Claimant, Mr Heard, challenges the adoption by the Defendants of their Joint Core Strategy on 22 March 2011, a development plan document created under the Planning and Compulsory Purchase Act 2004 for their areas. The challenge is brought under s113 of that Act, on the grounds that the Joint Core Strategy, JCS, was not within the powers of the Act, or there had been a procedural failing which had prejudiced the Claimant.

2 The three Defendants are district councils: Broadland DC and South Norfolk DC which surround Norwich City Council's area to the north and south respectively. The three have co-operated to produce a Joint Core Strategy for their areas. This includes the Norwich Policy Area, NPA, which covers the whole of the City Council's area and, putting it very broadly, the parts of the other two Councils' areas which lie closer to the City.

3 Part of the JCS involves meeting the growth requirements for the NPA laid down in the Regional Spatial Strategy, RSS, as adopted in 2008; it is now the Regional Strategy. The JCS, in order to meet its statutory obligation to conform generally to the RSS, had to provide for the stipulated levels of growth; but it was for the JCS to decide where that should take place. The JCS includes, as part of its provision for the RSS requirement, major growth in an area to the north east of Norwich known as the North East Growth Triangle, predictably, NEGT.

4 Mr Heard is a resident in that area north east of Norwich which is earmarked for major growth in the JCS. He is the chairman of an action group, Stop Norwich Urbanisation, SNUB. Although opposed to urbanisation generally, Mr Heard contends that the JCS is unlawful because the Strategic Environmental Assessment, SEA, which the Councils had undertaken, did not comply with two requirements: first, that it explain which reasonable alternatives to urban growth in the North East Growth Triangle they had selected to examine and why, and second, that it examine reasonable alternatives in the same depth as the preferred option which emerged. It was not said that the examination of the preferred option was itself inadequate, nor that changes in circumstance required a further examination of previously discarded alternatives. The Defendants contended that the work they had done was sufficient for these purposes.

5 His second ground was that the Strategic Environmental Assessment was further unlawful

since it did not assess the impact of a proposed new highway, the Northern Distributor Road, the NDR, or of alternatives to it. The NDR was fundamental to the achievement of the full development of the North Eastern Growth Triangle, though there was a case for it even without that development. The Defendants contended that the NDR had been adequately assessed in documents prepared by the highway authority, Norfolk County Council, and that although the JCS supported and in some ways promoted the NDR, it was not for it to assess it or to consider alternatives to it. The County Council was part of the informal Greater Norwich Development Partnership, GNDP, with the three District Councils.

The legislative framework

6 A plan such as the JCS has to be subject to what is called Strategic Environment Assessment, by virtue of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment." This has been transposed into domestic law by the Environmental Assessment of Plans and Programmes Regulations 2004 SI no.1633. Regulation 8 prohibits a plan being adopted until regulation 12, amongst others, has been complied with. Regulation 13 requires the plan, when in draft, and its accompanying environmental report to be subject to public consultation. Regulation 8 prohibits the adoption of a plan before the environmental report and the consultation response have been taken into account. These reflect requirements of the Directive. Environmental assessment is thus, as Mr Upton submitted, a process and not merely a report.

7 Regulation 12 (2)(b) requires an environmental report "to identify, describe and evaluate the likely significant" environmental effects of implementing the plan, and of "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme". The report has to include such of the information set out in Schedule 2 as is reasonably required although it can be provided by reference to relevant information obtained at other levels of decision-making. Item 8 in the Schedule is "an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties...encountered in completing the information." Mr Upton for the Defendants emphasised the word "outline". It is not, he said, a requirement to give reasons for selecting the option eventually pursued; but one would normally expect them to emerge reasonably clearly from the assessments.

8 European Commission has provided guidance on Article 5(1) of the Directive, the equivalent of regulation 12 of the UK Regulations, as to what level of assessment is required for alternatives. Alternatives to the option being promoted should be evaluated on the same basis and to the same level as the option promoted in the plan:

"In requiring the likely significant environmental effects of reasonable alternatives to be identified, described and evaluated, the Directive makes no distinction between the assessment requirements for the drafted plan or programme and for the alternatives. The essential thing is that the likely significant effects of the plan or programme and the alternatives are identified, described and evaluated in a comparable way. The requirements in Article 5(2) concerning scope and level of detail for the information in the report apply to the assessment of alternatives as well. It is essential that the authority or parliament responsible for the adoption of the plan or programme as well as the authorities and the public consulted, are presented with an accurate picture of what reasonable alternatives there are and why they are not considered to be the best option. The information referred to in Annex I should thus be provided for the alternatives chosen."

9 Mr Upton suggested that it was too simplistic to say that all alternatives had to be assessed to the same degree throughout a process in which, as the Directive and Regulations envisaged, options were progressively narrowed and discarded as successive stages moved towards a preferred option. Those options discarded at earlier stages did not have to be revisited at every subsequent stage; see City and District Council of St Albans v Secretary of State for Communities and Local Government [2009] EWHC 1280 (Admin), Mitting J para 14.

10 The guidance also deals with what constitutes a reasonable alternative: it must be realistic,

fall within the legal and geographic competence of the authority, but it otherwise depends on the objectives, and geographical scope of the plan. Alternative areas for the same development are an obvious example. The longer term the plan, the more likely it will be that it is alternative scenarios which are examined.

11 Article 1 of the Directive is relevant because it makes clear that the objective of the Directive in providing for environmental assessment is to protect the environment and integrate environmental considerations into the adoption of plans with a view to "promoting sustainable development". This, with Article 4, which permits a national authority to integrate compliance with the Directive into national procedures, has led to the practical implementation of the Directive through the requirement in s19(5) of the 2004 Act that a plan be subject to a Sustainability Appraisal, SA, rather than through a separate document entitled an environmental report. Article 4(3) also recognises that there may be a hierarchy of plans, and that the assessment will be carried out at different levels.

12 To avoid duplication in this process, Article 5(2) permits the decision as to what information is reasonably required to take account of "the contents and level of detail in the plan ..., its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process...." This is reflected in regulation 12 of the domestic Regulations. Mr Harwood for the Claimant submitted, and I accept, that while options can be rejected as the plan moves through successive stages, and do not necessarily require to be re-examined at each stage, a description of what alternatives were examined and why had to be available for consideration at each stage, even if only by reference back to earlier documents, so long as the reasons there given remained sound. But the earlier documents had to be organised and presented in such a way that they could readily be ascertained and no paper chase was required to find out what had been considered and why it had been rejected; see Save Historic Newmarket Ltd v Forest Heath District Council [2011] EWHC 606 (Admin), Collins J, paras 17 and 40.

13 At para 40, he said, and it provides a useful summary of the test:

"40. In my judgment, Mr Elvin is correct to submit that the final report accompanying the proposed Core Strategy to be put to the inspector was flawed. It was not possible for the consultees to know from it what were the reasons for rejecting any alternatives to the urban development where it was proposed or to know why the increase in the residential development made no difference. The previous reports did not properly give the necessary explanations and reasons and in any event were not sufficiently summarised nor were the relevant passages identified in the final report. There was thus a failure to comply with the requirements for the Directive and so relief must be given to the claimants."

The facts

14 The plan-making process is rather convoluted and the sequence of documents constituting it needs to be set out. I could not readily discern it from the parties' submissions.

15 Although the way in which the NDR was treated is the subject of a separate ground, the Northern Distributor Road and the North East Growth Triangle are closely linked and it is convenient to deal with them together chronologically, though it must be noted at the outset that it is Norfolk County Council which bears statutory responsibility for the transportation strategy, and not the Defendants.

16 The County Council consulted on various Norwich Area Transportation Strategy, NATS, options in 2003. An SEA was carried out in 2004 for the NATS, voluntarily since it preceded the coming into force of the Directive; it was not itself subject to public consultation. A number of options, sieved from a larger variety, were fully considered including three which involved differing lengths of NDR, and three which involved no NDR, but improved public transport and other measures to reduce car usage instead. The preferred strategy included what then was called the three quarter NDR; the NATS had been designed to help deliver the growth that would occur in the Norwich area with or without a supportive transport infrastructure, and to address the

problems it would create. The NDR was identified as an important element to enable growth within and around Norwich; without it, developer led schemes to provide accessibility to individual developments would lead to a disjointed network. The NDR was "the only feasible solution for dealing with growth and transport problems and issues on a long-term basis."

17 Policy 2 of the NATS, adopted in 2006, provided that an NDR would be developed for implementation in conjunction with other measures. Its precise alignment was not for decision at that stage.

18 The County Council adopted its Second Local Transport Plan in 2006 as required by the Transport Act 2000. A Strategic Environmental Assessment was undertaken for this purpose, published in 2006, and summarised in the LTP itself. It assessed the overall environmental effect of the LTP, the impact of the two potential major schemes, one of which was the NDR, and the environmental effect of the LTP with and without those major schemes. An Environmental Report was consulted on with the Provisional LTP in 2005, but it did not deal with the NDR. The rather longer SEA of 2006, which was not itself consulted on, did not assess the LTP without the NDR alone, nor alternatives to the NDR. The LTP promoted the NDR as a major scheme, describing its purpose, advantages, position in the development plan framework, and its financing status.

19 Meanwhile, other parts of the development plan process were under way. The revised Regional Strategic Strategy, RSS, had been going through its draft stages, themselves informed by a Sustainability Appraisal at two stages which incorporated a Strategic Environmental Assessment. This was adopted in May 2008, as the East of England Plan, EEP, by the Secretary of State for Communities and Local Government. It became part of the statutory development plan framework under the 2004 Act, and local development plan documents such as the JCS had to conform generally to it. It covered the period 2001–2021.

20 The EEP dealt with transportation; Policy T15 identified the Norwich area as one which was likely to come under increasing transport pressure as a result of underlying traffic growth and the RSS development strategy. Appendix A listed the NDR as one of the regionally significant investments currently programmed for the region, a Major Local Transport Plan Scheme.

21 Policy NR1 dealt with Norwich as a "Key Centre for Development and Change", a regional focus for housing, employment and other activities: 33000 additional houses were to be provided in the NPA between 2001–2021, facilitated by LDDs prepared jointly by the three Defendants; requirements for consequential transport infrastructure "should be determined having regard to" the NATS. Policy H1 elaborated the housing strategy, setting district totals conforming to that total for the NPA parts of the three involved here.

22 During the preparation of the revised RSS, the three Defendant Councils had begun work on their Joint Core Strategy. In November 2007, the Councils issued, for public consultation, an "Issues and Options" paper. This identified the housing requirements for the NPA in the then draft EEP. The three strategic options for dealing with the required growth were dispersing growth across a large number of small scale sites, medium concentration on large estate size sites of 15–3000 units, or Larger Scale Urban Extensions and new settlements in the range 5,000–10,000 dwellings. An initial assessment of the broad locations for major growth, including the north east sectors inside and outside the NDR, was appended; a full sustainability appraisal was promised at the preferred options stage, but early indications on a comparative basis were provided under the heading "Some issues relating to potential growth locations". Comments were sought on which broad strategy should be preferred, (Q11) and on the various major growth locations outlined, (Q12). Potential combinations for large scale growth were identified and comments sought as to which were preferred (Q13):

"As well as identifying smaller urban extensions and growth in villages, the main pattern of large-scale growth could be:

- a) concentration on the north east and south west of Norwich and at Wymondham
- b) as a) plus a fourth location for large scale growth
- c) as a) plus two or more locations for medium scale growth
- d) a different combination for major growth options

e) a more dispersed pattern of growth (perhaps an average of 1,500 dwellings in ten locations).”

23 This document also dealt with strategic infrastructure priorities. The NDR had been identified as essential to managing the demand for travel arising from the levels of growth planned in the EEP, providing access to the potential growth areas on the north eastern fringes of Norwich and enabling traffic to be removed from the city centre and improvements to non-car based transport.

24 The Sustainability Appraisal for the Issues and Options paper assessed the different strategies for locating growth, (Q11 above). There was also an appraisal of the growth locations identified in the appendix, (Q12): north-east sector inside NDR, north-east sector outside NDR, east sector outside NDR, and south and south west sectors; 12 sectors in all, including some combinations. The potential combinations for large scale growth, (Q13), were grouped for appraisal under two heads, which represented a concentrated option and a more dispersed option; option C was regarded as middle ground between the two and option D, a different combination of major growth areas, was not assessed at all. The responses were reported at length.

25 In August 2008, there was a technical consultation with statutory bodies on the practicalities of various major growth options in the NPA. It proposed that the planned housing should be in large scale developments concentrated in particular locations with a mixture of small scale development dispersed around the area: it put forward three options of combinations of large scale development, totalling 24000, allied to options for smaller scale development. No large scale site exceeded 6000, most were between 2-4000. The large-scale options were set out in Policy 5; no decision had yet been made on which was to be favoured. Appendices described them in more detail. Each involved development in the north-east sector with a NDR. (The 33000 units over the period 2008-2026 for the NPA included allocations and permissions as yet unbuilt, so the figure for new allocations was 24000, reduced later to 21000.)

26 In February 2009, the four authorities in the GNPD agreed on a favoured growth option as the basis for public consultation. The reports analysing why that option emerged were not before me, and are not part of the Sustainability Appraisals or Strategic Environment Assessments. Regulations requiring the production of a preferred options report had been changed.

27 The statutory public consultation did not begin until March 2009. The document included as Policy 2 what was required by the EEP for the NPA, and as Policy 5 what was by now the favoured option for providing for that growth in the NPA, a variant of the third option in the technical consultation paper, with 21000 in the larger locations, in Norwich, and in the North East Growth Triangle on each side of the NDR, moderate growth broadly to the south west of Norwich, with some sites elsewhere identified for small scale development.

28 The commentary to Policy 5 said that there was no significantly different public preference for the locations for major growth, but that the technical consultation included three more detailed options for larger growth in the NPA which were described in appendices. All required the NDR, and all involved major development in the NEGT. The favoured option, said the commentary, drew upon the consultation response and evidence, but was not specific as to what that was.

29 A draft Sustainability Appraisal was produced in April 2009. It dealt with the three original growth options in the technical consultation document of 2008, plus a variant, and with the newly favoured option. These all included the north-east sector with NDR. It appraised the various locations for major growth in Policy 5. It did not deal with the responses to the technical consultation.

30 In August 2009, a report on both statutory consultations was published.

31 Before the JCS was submitted to the Secretary of State for examination, a Sustainability Appraisal report and the pre-submission JCS were issued for yet further public consultation in November 2009. This SA was intended to fulfil the role of the SEA under the Directive and transposing regulations.

32 This SA makes the point that it was not the first stage of SA. However, the summary of the appraisal findings states that a key task of the JCS is to develop a "spatial strategy for distributing" the housing targets set for the area by the EEP. One component was a "major urban

extension to the North-East of the city, based around two or three centres either side of the proposed" NDR. The summary noted the "broadly positive sustainability effects" of this element. Another element, because it included major development at Long Stratton, had some local benefits but strategic drawbacks.

33 The SA said that it set out the legal requirements of the SEA Directive and explained how they were or would be met. Chapter 5, (it meant 3), would provide "an outline of the reasons for selecting the alternatives dealt with"

34 Chapter 3 entitled "Developing the Options" set out the requirement that "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme are identified, described and evaluated." Paras 3.3.2-3.3.3 read:

"3.3.2 The Pre-Submission JCS sets out the GNDPs current preferred approach in a series of draft policies. These policies represent the GNDPs preferred options, which have been selected and refined following consultation on alternative options that has occurred in the past. In particular, options were published and consulted during the 'Issue and Options' consultation in 2007. All options presented in the Issues and Options consultation document were also subjected to SA to establish the relative merits of options in sustainability terms and inform the identification of preferred options. The findings of the Issues and Options SA were summaries in a brochure, which is available to download from the GNDP website.

3.3.3 Following the Issues and Options consultation the GNDP were able to identify many of their preferred options. However, it transpired that there was a need to consult further on options for the spatial approach to growth. Identification of a spatial approach to growth is the single most important decision to be made by the JCS, and the decision with the most wide ranging and potentially significant sustainability implications. The section below gives further details as to how the preferred approach was developed."

35 The "Options for the spatial approach to growth" summarised the process by which the preferred option had been arrived at. It started with the three broad strategies from the Issues and Options paper, and the five options for their spatial distribution. The three new distribution options at the technical consultation stage were then set out as above; the NEGTT was common to them all. Subsequent tables briefly rehearsed the relative sustainability merits of those three options. The preferred option was then set out; paragraph 3.3.8 said that after the technical consultation, the GNDP "were able to identify their preferred option" for the spatial distribution of growth, which had been published for public consultation. It had not changed since then, when it had been the subject of SA. It had been re-appraised as part of this SA in the "light of further clarity about its implementation".

36 Although the later SEA checklist says section 3.2 is where the alternatives are considered along with chapter 5, the relevant passages on alternatives for this case are those which I have cited, save for the introduction to chapter 4 which refers to the directive obligation to provide an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken. Chapter 5 concerns the preferred options themselves.

37 The appraisal in the annexe to the SA is an appraisal only of the preferred options against a comprehensive array of policies. It is not an examination of alternatives.

38 It included this on Policy 8 "Access and transport", which both sides put some reliance on:

"Recommendations

- One key area of concern relates to whether the NDR, which is promoted through this Policy, would preclude sustainable patterns of travel and transport associated with the North East Growth Triangle. It will be of great importance to ensure that the NDR does not have this effect. It will be important to design in ambitious measures that encourage residents to meet more of their needs locally by sustainable modes of travel, and that also allow ease of access to Norwich by rapid public transport. When considering the

necessity for the NDR it should be possible to assume minimal use of this road by residents of the Growth Area.”

39 Policy 8 said that the transportation system would be enhanced to develop the role of Norwich as a Regional Transport Node, particularly through the implementation of NATS, including construction of the NDR. Implementation of NATS was fundamental to the strategy, enabling the capacity which it would release in Norwich to be used for non-car modes of transport, and providing the access necessary to key strategic employment and growth locations. A corridor, 100m either side of the centre line of the current scheme, was protected and would be shown on the Broadland DC adopted Proposals Map. The NDR “is recognised” in the EEP, is a major scheme in the Local Transport Plan and is in the Department of Transport’s Development Pool. This policy was to become Policy 6 in the adopted JCS.

40 Certain changes were made to the JCS which warranted further SA on these “focussed changes”. The only point of relevance is that it is clear that the only purpose of the SA was to appraise those specific changes and not alternatives more generally.

41 The JCS was submitted in March 2010 for examination by Inspectors appointed by the Secretary of State. This was held in November and December 2010; their report to the Councils was published in February 2011, and concluded that the JCS was sound and in conformity with the EEP, but certain changes were required.

42 Issue 6 examined whether the JCS provided an appropriate and deliverable distribution of the planned growth required by the EEP for the NPA, coupled with a sustainable pattern of transport infrastructure. One of the issues was whether the distribution was sound given its asserted dependence on the NDR, which might not be built. The NEG T and NDR were closely linked in this argument; the Inspectors rejected a non-NDR package of transportation interventions in para 51:

“It has been argued that a non-NDR package of NATS interventions has not been modelled and that this could conceivably produce a better overall solution. However, we are not convinced that such an option would be realistic and place weight on the DfT’s favourable ‘in principle’ assessments and the judgements which led to the NDR’s acceptance into ‘Programme Entry’ and the ‘Development Pool’, as discussed above.”

43 The Inspectors nonetheless saw the NDR as uncertain and particularly uncertain in timing. They asked whether suitable changes could be introduced to increase the resilience of the JCS in the face of this uncertainty. They thought that the JCS tended to portray the situation in terms which were too stark: no NDR, no development in the NEG T. Changes were proposed which provided “an appropriately qualified partial alternative approach to development in North East Norwich”. Essentially, some development could take place in certain parts without an NDR, but were it not to have happened by the time that threshold had been reached, an Action Area Plan, AAP, would investigate whether any additional growth could take place in the NEG T without it, and subject to any further development which that AAP might show to be satisfactory, there would be a complete review of the JCS proposal for the NEG T.

44 The Inspectors rejected the argument that there should be no growth in the NEG T with or without the NDR, but concluded, para 59:

“The AAP is the proper mechanism for carrying out the site-specific investigations, considering the alternatives and undertaking the public consultations necessary to establish the point at which non-delivery of the NDR may, or may not, become a ‘showstopper’ for further development in the growth triangle. The JCS should not go beyond its strategic role and fetter the necessary thorough investigation through the AAP by making premature commitments based on untested scenarios.”

45 They then turned to the NEG T. After some comments about how the scale of development came to be in the EEP, the Inspectors dealt with the merits, para 72:

"Moreover, there are strong reasons to support the selection of this area as a location for a major urban extension. Fundamentally, if development is to take place at the overall scale proposed by the GNDP constituent authorities (which we have found sound), the pattern of small towns and villages in Broadlands offers no realistic alternative 'dispersal' options capable of accommodating such numbers in ways likely to be sustainable and capable of respecting the characters of the host settlements. There is no evidence that Norwich could accommodate more than already reflected in the JCS account of existing commitments, and it appears (from our consideration of the South Norfolk options) that redistribution from the north of the NPA to south is not a viable option. Concentrating the proposed development at this major growth location is the most effective way of maximising its contribution to the NPA's sustainability and providing infrastructure economically."

46 After dealing with the arguments for and against other parts of the proposed distribution of growth, the Inspectors identified the next sub-issue as "Does the JCS distribution represent "the most appropriate plan when considered against reasonable alternatives?". The question is drawn from PPS12. They said, para 90:

"With regard to the North East Norwich growth triangle, we have already concurred with GNDP's judgement that from a relatively early stage in the evolution of the JCS there has been no reasonable sustainable alternative to a substantial urban extension in that location if this scale of growth is to be accommodated."

47 They then referred to the 5 options for South Norfolk, including Long Stratton, which had been developed between May 2008 and February 2009. These had been subject to a comparative SA in February 2009. More evidence was now available. Para 94 contained this conclusion:

"We therefore conclude that South Norfolk's view that the JCS distribution represents the best overall 'political fit' is not inconsistent with judgements that it (a) represents the most appropriate plan when considered against the reasonable alternatives and (b) broadly fulfils GNDP's duty under S39 of the 2004 Act to exercise its DPD-making functions with the objective of contributing to the achievement of sustainable development."

48 Their overall conclusions on Issue 6 were in para 95:

"Our broad conclusion is that the major principles of NATS, as reflected in the JCS, represents a sound and sustainable transport strategy for the NPA. The implementation of these measures would enable the JCS to proceed with a pattern of growth which is justified, effective and consistent with national policy. This conclusion is subject to a number of necessary changes that have been discussed above. Together, these give the JCS greater resilience and effectiveness in the case of delay to, or non delivery of, the NDR by indicating a mechanism for transparently establishing the maximum extent to which development at the growth triangle could proceed before triggering the need for review of the JCS in that respect."

49 They recommended various changes as their analysis had foreshadowed.

50 The JCS, with the incorporation of the required changes, was adopted in March 2011. An Environmental Statement was required to accompany it by the 2004 Regulations. It had to set out, among other matters, the reasons for choosing the plan as adopted, in the light of other reasonable alternatives. It said this on that topic:

"5.1 The iterative plan making process set out above, informed by SA and consultation throughout, involved consideration of a number of reasonable alternatives.

5.2 This is particularly the case in relation to the spatial location of growth. At the Issues

and Options stage ten potential growth options were put forward (plus brownfield sites in the city & suburbs). The Sustainability Appraisal was used to select options to take forward along with other evidence such as the water cycle study, public transport modelling and discussions with children's services.

5.3 The former preferred options document considered alternatives for growth options and area-wide policies. The alternatives were assessed and captured in the SA document and remain in it as evidence of considering reasonable alternatives.

5.4 The strategy submitted to the Secretary of State has a relatively concentrated pattern of growth in Broadland, based on sustainable urban extensions and a more dispersed pattern in south Norfolk, with growth focussed on a number of existing settlements. Earlier plan drafts, supported by the SA, included options that had promoted a somewhat less dispersed pattern of growth in south Norfolk, with more limited development at Long Stratton.

5.5 Having regard to the technical evidence and public comment, the strategic preference of the GNDP was to promote growth in Long Stratton to achieve the consequent environmental improvements to the village.

5.6 The strategy has been adopted subsequent to a formal Examination in Public. The independent Inspectors concluded that the plan is sound, subject to a number of required changes. These changes have been incorporated into the adopted strategy."

51 The rest of the section summarised the support given by the Inspectors to the adopted strategy.

52 Policy 9 covers the growth strategy for the NPA: new allocations for a minimum of 21000 houses are to be identified across a number of locations against which the minimum number of houses in each was noted. This would be supported by construction of the NDR. Policy 10 identified the locations in the NPA for major new or expanded communities, including the NEGT on both sides of the NDR, the complete development of which required the NDR, but the scope for partial delivery, as required by the Inspectors is also reflected in the policy.

Ground 1: SEA and alternatives

53 Mr Harwood's Skeleton Argument for the Claimant contained a number of what seemed to me to be rather carping criticisms of the SEA and JCS, but he refined and improved his submissions in oral argument. He focussed wisely on the appraisal of alternatives to the NEGT, the Claimant's area of interest.

54 None of the high level options for growth in the Issues and Options Paper, (Q11), were actually chosen. The initial assessment of growth options, (Q13), did not cover two of the five options for the location of growth: 3 and 4 in the JCS SA, also denoted as C and D. D did not include growth in the NEGT. Three more specific options were put forward in the statutory technical consultation paper, but the Councils were not relying on the SA accompanying that paper. There was no analysis of why the alternatives selected at that stage only included ones with growth in the NEGT. The preferred option emerged from that process as a mixture of options 2 and 3, and the Environmental Report/SA of September 2009 dealt with it. There was no comparable assessment of reasonable alternatives considered by the three Defendants in it; the assessment of the options from the technical consultation paper was not done on the same basis as that of the preferred option. There was no explanation of the alternatives selected. It contained no cross-reference to any other paper where the identification and equivalent appraisal of alternatives could be found. Its summary was silent on that topic. It was possible that the options considered in the Issues and Options SA were reasonable options, even the only reasonable ones considered, but the SA did not say so, and it was not obvious why every combination of options included a north east sector, especially as the NDR on which it depended was uncertain. There was no comparable assessment of reasonable alternatives against the one preferred, nor could there be one until the preferred option had been identified. It was not his argument that there was some topic of assessment which those options had failed to consider, nor did that meet his argument.

55 Mr Upton, for the Councils, took me through the evolution of the planning documents, placing

considerable weight on the April 2009 SA accompanying the public consultation document, and the September 2009 SA. It was for the three Councils to decide what were reasonable alternatives in the light of the SA scoping report of December 2007 and the requirements of the RSS. A range of reasonable alternatives had been identified and assessed, in a way appropriate for the level at which the JCS was operating in the plan-making hierarchy. Many alternatives supported by SNUB were not alternatives which conformed to the RSS, and so could not be considered as alternatives at all. A wide range of options had been assessed on a comparable basis; the later document of September did not have to continue to examine so wide a range as at earlier stages as the St Albans case held. There really was only one sensible way to meet the growth requirements, as the Inspectors found.

Conclusions on Ground 1

56 I accept much of what Mr Upton said as a description of the way in which the JCS had been arrived at. It could not be stigmatised as unreasonable. The JCS had been the subject of frequent public consultation. The preferred option had been properly assessed itself. A number of alternatives had been assessed.

57 I did not find it easy, however, to discern from Mr Upton's submissions how he answered the essential factual contention at the heart of Mr Harwood's submissions. Certainly it was not by showing me any document in which the outline reasons for the selection of alternatives at any particular stage were clearly being given. This is not the failing of the advocate, but in the factual material which he had to present. Nor was there any discussion in an SA, in so far as required by the directive, of why the preferred options came to be chosen. Nor was there any analysis on a comparable basis, in so far as required by the directive, of the preferred option and selected reasonable alternatives.

58 The Issues and Options Paper and its Sustainability Appraisal are in themselves perfectly sensible papers. However Option D, the different combination of growth areas, was not assessed, and the SA itself did not explain why not. There was therefore no assessment of an alternative which did not include development in the NEG, nor an explanation of why that was not a reasonable alternative, even though one which might have been identified as an option. This was not unimportant in the light of uncertainty over the NDR and its significance for the full development of the NEG.

59 The statutory technical consultation produced three more options but did not itself consider any option which did not include development in the NEG, with an NDR. It did not describe the selection of those options.

60 There was an important report to the Councils in February 2009 which led to the selection of the preferred option; it explains why it was preferred, and could contain information as to why the options examined had been selected. But that was not produced before me, and more importantly, it was not cross-referred to or publicly available as part of any SA. By the time of public consultation in March 2009, the preferred option had been selected.

61 The April 2009 SA did not explain what alternatives had been chosen for examination; it explained the ones which had been considered but not why it was those ones which had been considered and not others. It did not explain why the preferred option had been selected. Again, the only options considered involved development in the NEG, and the NDR.

62 The crucial stage was the SA submitted in September 2009 in connection with the pre-submission JCS, which the Councils intended as the fulfilment of their directive obligations. It would have been open to the Councils to describe here the process of selection of alternatives for examination at each stage. They could have done this by reference to earlier documents, if earlier documents had contained the required material. But the earlier documents do not contain the required information as to why the alternatives considered had been selected. If the outline of the reasons for the selection of alternatives was not dealt with in the earlier documents, the Councils had to provide them in this document. But that is missing from the SA.

63 The SA itself only describes what has been done. It contains no further analysis of the selection of alternatives for consideration at various stages, nor for the choice of the preferred option. It contains only a brief assessment of the alternatives, and does not itself contain the explanation which it implies is in the earlier documents, but, which in fact, on this particular

aspect is simply not covered in them. Crucially, it is not possible to tell from the SA itself or from earlier documents what the Councils' answer is to the Claimant's question: were the only alternatives it was thought reasonable to select ones involving development in the NEGT, and if so -in outline- why so, especially in view of the uncertainty over the NDR, and the importance attached to the NDR in achieving the JCS with development in the NEGT. The SA is wrong in saying that all the options in the "Issues and Options" paper were assessed.

64 I accept that the Inspectors' report contains much which is supportive of the JCS, including the statement that there was no reasonable alternative to a substantial urban extension in the NEGT, notwithstanding problems with the NDR. But although their report evidences a view about alternatives, it is not itself part of the SA. They may be required to consider alternatives by the Secretary of State in PPS12, but that is not in fulfilment of the directive obligation or of those in the regulations. It is possible of course, as well, that such a view is affected by a lack of examination of an alternative; and it is also possible that the answer to why no non NEGT growth scenario was considered is so obvious to a planner that it needs no explanation; it could not have been considered a reasonable alternative. But I did not receive such an explanation either from the Councils, nor does the Inspectors' conclusion suffice to answer it.

65 The final ES with the final JCS does not take matters further.

66 I conclude that, for all the effort put into the preparation of the JCS, consultation and its SA, the need for outline reasons for the selection of the alternatives dealt with at the various stages has not been addressed. No doubt there are some possible alternatives which could be regarded as obvious non-starters by anyone, which could not warrant even an outline reason for being disregarded. The same would be true of those which obviously could not provide what RS required, or which placed development in an area beyond the scope of the plan or the legal competence of the Defendants. But that is not the case here on the evidence before me, in relation to a non NEGT growth scenario, with or without NDR, and especially with an uncertain NDR. Without the reasons for the earlier selection decisions, it is less easy to see whether the choice of alternatives involves a major deficiency.

67 I accept that the plan-making process permits the broad options at stage one to be reduced or closed at the next stage, so that a preferred option or group of options emerges; there may then be a variety of narrower options about how they are progressed, and that that too may lead to a chosen course which may have itself further optional forms of implementation. It is not necessary to keep open all options for the same level of detailed examination at all stages. But if what I have adumbrated is the process adopted, an outline of the reasons for the selection of the options to be taken forward for assessment at each of those stages is required, even if that is left to the final SA, which for present purposes is the September 2009 SA.

68 The reasons for the selection of the preferred option, as distinct from the reasons for the selection of the alternatives to be considered, have not been addressed as such either in the SA, although some comparative material is available. The parties dispute the need for these reasons. It was very surprising to me that the reason for the selection of the preferred option was not available as part of the pre-submission JCS or the accompanying September SA, nor readily available in a public document to which the public could readily be cross-referred, with a summary.

69 This is not an express requirement of the directive or regulations, and I do not regard European Commission guidance as a source of law. However, an outline of reasons for the selection of alternatives for examination is required, and alternatives have to be assessed, whether or not to the same degree as the preferred option, all for the purpose of carrying out, with public participation, a reasoned evaluative process of the environmental impact of plans or proposals. A teleological interpretation of the directive, to my mind, requires an outline of the reasons for the selection of a preferred option, if any, even where a number of alternatives are also still being considered. Indeed, it would normally require a sophisticated and artificial form of reasoning which explained why alternatives had been selected for examination but not why one of those at the same time had been preferred.

70 Even more so, where a series of stages leads to a preferred option for which alone an SA is being done, the reasons for the selection of this sole option for assessment at the final SA stage are not sensibly distinguishable from reasons for not selecting any other alternative for further examination at that final stage. The failure to give reasons for the selection of the preferred

option is in reality a failure to give reasons why no other alternatives were selected for assessment or comparable assessment at that stage. This is what happened here. So this represents a breach of the directive on its express terms.

71 There is no express requirement in the directive either that alternatives be appraised to the same level as the preferred option. Mr Harwood again relies on the Commission guidance to evidence a legal obligation left unexpressed in the directive. Again, it seems to me that, although there is a case for the examination of a preferred option in greater detail, the aim of the directive, which may affect which alternatives it is reasonable to select, is more obviously met by, and it is best interpreted as requiring, an equal examination of the alternatives which it is reasonable to select for examination along side whatever, even at the outset, may be the preferred option. It is part of the purpose of this process to test whether what may start out as preferred should still end up as preferred after a fair and public analysis of what the authority regards as reasonable alternatives. I do not see that such an equal appraisal has been accorded to the alternatives referred to in the SA of September 2009. If that is because only one option had been selected, it rather highlights the need for and absence here of reasons for the selection of no alternatives as reasonable. Of course, an SA does not have to have a preferred option; it can emerge as the conclusion of the SEA process in which a number of options are considered, with an outline of the reasons for their selection being provided. But that is not the process adopted here.

72 Accordingly, the Claimant succeeds on this ground.

Ground 2: the absence of an assessment of the NDR in the JCS SA

73 Mr Harwood submitted that there was a duty on the councils to have regard to the LTP under regulation 15 (1)(b) and (c) of the Town and Country Planning (Local Development)(England) Regulations 2004 SI No. 2204. The RSS required regard to be had to the NATS. It did not require the NDR. Since the NDR was part of the JCS, and was said to be "promoted" through it, the JCS SA had to include an environmental assessment of the NDR. Instead, it had been taken as part of the baseline for the assessment of other development, colloquially as a given and not as a JCS proposal; Mr Doleman, a transportation planner with the County Council, made as much clear in his witness statement. The County Council was part of the GNDP, which as a partnership would promote the NDR, with the JCS supporting its provision and protecting its alignment, opposing inconsistent development. The NDR and NEGT went together: there may have been a case put forward by the County Council for the NDR without the NEGT, but there was no case for the full NEGT without the NDR. If the NDR were undesirable, it would affect the whole growth strategy, or at least the distribution of the major growth areas. The JCS protected an alignment corridor for the preferred three-quarter length NDR, yet that had not been assessed. However, his real concern was not with alternative alignments but with alternatives to the NDR altogether. Nothing in the Inspectors' report showed that there were no reasonable alternatives to the NDR. Given that there remains uncertainty over whether the NDR will be built, and the effect which that would have on the NEGT, there had to be alternatives to the NDR and NEGT. Those had not been considered.

74 The JCS did not cross-refer to other documents, notably the voluntary SA which accompanied the NATS, or the SA which accompanied the LTP. The NDR was not dealt with as a discrete option in them either. The voluntary NATS SA could not be equivalent to a statutory SA since the SA had not been subject to public consultation, unlike NATS itself, nor could any decision have been made in the light of consultation responses to it.

75 Mr Upton's essential contentions were that the NATS and LTP determined what infrastructure was required to support the level of development and its location. The RS explicitly required account to be taken of the NATS, of which NDR was part. The LTP had taken the general level and distribution of growth in the draft EEP into account. Mr Upton took me through the various planning documents which showed that the NDR had been part of the baseline since at least 2007. His submission was supported by PPS 12: "Local Spatial Planning"; para 4.10 said that "the outcome of the infrastructure planning process [here the NATS and LTP] should inform the core strategy and should be part of a robust evidence base". It recommended that those responsible for delivering infrastructure and those responsible for the core strategy align their planning processes. Para 4.28 emphasises the importance of not advancing a core strategy which depended on others for its implementation when those others had not agreed it. No challenge had been made to the adequacy of its SEA. Incorporation into the JCS did not require

a separate SEA. There was no need to duplicate or to repeat SEAs.

76 Those two plans were also the statutory responsibility of the County Council as highway and transportation authority. There were no reasonable alternatives for the District Councils to consider in promoting the JCS, since transportation was not within their statutory competence. So it had rightly been treated as part of the baseline, though the various levels of development in various locations on the NDR and on the roads leading to it would be relevant. Besides, the Inspectors had concluded that there was no reasonable alternative to the NDR. The reference in the SA of September 2009 to the NDR being promoted through the JCS was no more than a reference to its being relied on in the JCS. The detail of the route would be dealt with in the Broadland DC AAP.

Conclusions on ground 2

77 The starting point to my mind is that proposing or planning the NDR is not within the remit of the JCS. It is for the highway authority to plan and promote the NDR through its plans. The NDR is outside the Defendants' legal competence. There is no substance in the suggestion that the existence of the informal GNDP alters the allocation of statutory responsibility because it includes the Defendants, and all four Councils are in harmony on this issue.

78 Of course, there are references in the JCS to the role of the NDR, and there is a relationship between the policies for accommodating growth in the JCS, and the infrastructure to support it. The promotion of the NDR, its status in the EEP, NATS and LTP, and its budgetary status, make it a relevant factor in the judgment of where growth should be. It would be unwise, if not impossible, to create a coherent strategy for any plan if the proposals for major infrastructure were ignored. It may make it unreasonable to consider alternative means of providing for growth which do not use that proposed infrastructure. That may be very relevant to how the defendants approached, albeit not explicitly, the selection of reasonable alternatives for examination. Their uncertainty may have to be planned for as well, as the Inspectors' recommended amendments showed. But none of that, including reliance on it for the selection of the preferred option, makes the NDR part of the JCS in the sense that the environmental effect of the NDR has to be assessed, growth in the NEGOT or not, as a proposal of the JCS. That does not turn the JCS into a plan or proposal for the infrastructure on which it relies.

79 True it is as well that the land use plan has to provide for safe-guarding of the corridor for the NDR, since to fail to do so could prevent its development, but that safe-guarding does not make the NDR a proposal of the plan for which alternatives and impacts have to be assessed. The fact that the JCS talks of promoting the NDR, a safeguarding and supportive role, does not amount to its adoption by another authority or create an obligation to assess it and alternatives. It merely reflects the importance which another public body's infrastructure proposal has.

80 In so far as the concern was with alternatives to any NDR rather than with alternative NDR alignments, that did not fall within the scope of the JCS. The alignment corridor itself is not a choice made within the JCS; the corridors were assessed in the 2006 LTP. Nor is the corridor a matter of concern to the Claimant who seeks an alternative to any NDR. The effect of different alignments within the protected corridor would be for assessment when the precise line came to be chosen.

81 The Defendants were right in my judgment to treat it as part of the baseline against which the environmental effects of the growth strategy were assessed. Of course the effects of the growth may be additional to the effects of the NDR which are part of the baseline in the assessment of the strategy, but the NDR is not itself a proposal for assessment in the JCS.

82 The second reason why this ground fails is that the NDR has been subject to environmental assessment as part of the adoption of the NATS, albeit voluntarily, and as part of the LTP. Those plans have been adopted. This challenge cannot review any inadequacies in that assessment. The time for such a challenge is long past. It is not the function of the JCS to remedy any deficiencies in earlier assessments undertaken for the purposes of other plans.

83 Accordingly this ground of challenge fails.

Discretion

84 Mr Upton submitted that no relief should be granted were he to lose on either of these grounds. A great deal of work had been done; the claims were in reality that the SEA had not been expansive enough on one topic. A number of alternatives had clearly been examined on a comparable basis as required. The reasons for selection and choice between alternatives and the preferred option were spelt out in a publicly available report, even though it was not part of the SEA. The Inspectors' Report gave reasons justifying the selection of the preferred option over the alternatives. The Directive had been substantially complied with. The Claimant had not been prejudiced by any procedural failings; he had put forward no realistic alternative which had been ignored.

85 Mr Harwood submitted that the failings he identified went to substance and not to procedure, and so questions of substantial compliance with procedural requirements did not arise. The obligation was to identify and explain the selection of reasonable alternatives, to assess them on a comparable basis, to consult the public about the plan and SA, and to reach a decision in the light of their responses. That was the essence of the process of environmental assessment. Berkeley v Secretary of State for the Environment [2000] UKHL 36, [2001] 2 AC 603 also showed that a disparate collection of documents, a paper chase through which the public might find its way, did not constitute substantial compliance with Directive requirements on environmental assessment. This case was to be distinguished from Younger Homes (Northern) v First secretary of State and Calderdale District Council [2004] EWCA Civ 1060, Laws LJ at paras 42-47.

86 S113 of the Planning and Compulsory Purchase Act 2004, as amended by the s185 of the Planning Act 2008, gave a wide variety of powers, short of quashing the whole JCS and starting again, which should be exercised here if relief were to be granted.

Conclusions on discretion

87 I am satisfied here that I should not exercise my discretion against the grant of any relief. There has been a series of failings in relation to the directive obligations. The Defendants may well be right that the option of no NEG growth is unrealistic. But I cannot regard there as being substantial compliance with the directive. I will hear submission on the precise form of relief, in the light of the powers in s113 of the 2004 Act, as amended.

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**CAMBRIDGE LOCAL PLAN AND SOUTH CAMBRIDGESHIRE
LOCAL PLAN EXAMINATION IN PUBLIC**

MATTER 5

INFRASTRUCTURE / MONITORING / VIABILITY

APPENDIX 4

SUBMITTED BY

CODE DP LTD

Contents:

**Pages 1 to 22 – Planning Inspectorate Report – Examination into the Joint Core Strategy for Broadland Norwich and South Norfolk, the Broadland part of the Norwich policy area Local Plan.
(PINS/G2625/429/7)**



The Planning Inspectorate

Report to Broadland District Council, Norwich City Council and South Norfolk District Council

by **David Vickery DipT&CP MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 13th November 2013

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO THE JOINT CORE STRATEGY FOR
BROADLAND, NORWICH AND SOUTH NORFOLK, THE BROADLAND PART OF
THE NORWICH POLICY AREA LOCAL PLAN**

Document submitted for examination on 4 February 2013

Examination hearings held between 21 to 23 May, and on 24 & 25 July 2013

File Ref: PINS/G2625/429/7

Abbreviations Used in this Report

Framework	National Planning Policy Framework
GNDP	Greater Norwich Development Partnership, which includes Broadland District Council, Norwich City Council and South Norfolk District Council (the three councils with responsibility for this Plan)
JCS	Joint Core Strategy
LDS	Local Development Scheme
LIPP	Local Investment Plan and Programme
LPA	Local Planning Authority
LP	Local Plan
MM	Main Modification
NDR	Northern Distributor Road
NEGT	North East Growth Triangle
NPA	Norwich Policy Area
PUD	Persistent Under Delivery
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHMA	Strategic Housing Market Assessment

Non-Technical Summary

This report concludes that the Joint Core Strategy for Broadland, Norwich and South Norfolk, the Broadland Part of the Norwich Policy Area Local Plan provides an appropriate basis for the planning of the area up to 2026, providing a number of modifications are made to it. The Councils have specifically requested that I recommend any modifications necessary to enable them to adopt the Plan. Almost all of the modifications were proposed by the Councils, except for new Policy 22 (MM2) which ensures the delivery of housing land if there is a later significant shortfall. I have recommended the modifications after full consideration of all the representations from interested persons on the relevant matters.

The Main Modifications can be summarised as follows:

- Clarification of the amount of development that can be permitted before the Northern Distributor Road is constructed and/or without the improvements planned for the Postwick Hub junction;
- Including the national "model" policy confirming the presumption in favour of sustainable development;
- Including a new flexibility policy to ensure the delivery of housing land in the Broadland part of the Norwich Policy Area in the event of a significant shortfall;
- Revising the Appendix 6 Housing Trajectory to accord with up-to-date figures and to explain how the tables and charts should be read;
- Updating and clarification of the Appendix 7 Implementation Framework, adding a separate section for the infrastructure required for this Plan; and
- Additional indicators for the Appendix 8 Monitoring Framework to ensure that it is effective.

Introduction

1. This report contains my assessment of the Joint Core Strategy for Broadland, Norwich and South Norfolk, the Broadland Part of the Norwich Policy Area Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the Examination is the assumption that the three Councils have submitted what they consider to be a sound plan. The basis for my Examination is the submitted draft plan (February 2013) which is essentially the same as the document published for consultation in August 2012.
3. My report deals with the Main Modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Councils requested that I should make any modifications needed to rectify matters that make the Plan unsound and not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
4. The main modifications that go to soundness have been subject to public consultation and, as set out in my report, Sustainability Appraisal (SA). My report takes into account all of the views expressed on these matters and in this light I have made some amendments to the detailed wording of the Main Modifications where these are necessary for consistency or clarity. None of these amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken.
5. My approach to the Examination has been to work with the Greater Norwich Development Partnership (the GNDP) and all the other participants in a positive, pragmatic and proactive manner, with the aim of resolving any elements in the Plan which are not legally compliant or sound. In doing so, I have considered all the points made in the representations, statements and during the discussions at the hearing sessions. However, the purpose of this report is to assess the soundness and legal compliance of the Plan, giving reasons for my recommendations for the main modifications, rather than to respond to all the points made in the representations.
6. Additional modifications (minor changes) can be made by the Councils on adoption of the Plan. Taken together, these must not materially affect the policies that would be set out in the Plan if it was adopted with the main modifications.

7. Reference numbers for documents in the evidence base are provided within square brackets [] in the report.

Preamble

8. The Plan has been produced to address the Judgment and Court Order made by Mr Justice Ouseley in the High Court on 24 February 2012 and 25 April 2012 respectively in the case of *Heard v Broadland District Council, South Norfolk District Council and Norwich City Council*. He ordered that those parts of the Joint Core Strategy (the JCS), adopted in March 2011, involving the Broadland part of the Norwich Policy Area (the NPA), including the North East Growth Triangle (the NEGТ) with a total of 9,000 proposed dwellings and 25 hectares of employment land, should be remitted for further consideration, and that a new Sustainability Appraisal (SA) for that part of Broadland in the NPA and the reasonable alternatives to it should be prepared. The Court Order stated that the remitted parts of the JCS should be treated as only having been taken up to the 2012 Local Planning Regulation 19 publication stage (previously known as the 'pre-submission stage'), and as not having been examined or adopted.
9. Thus, the Plan is not a review of the adopted JCS or of any other Plan or proposal, such as the Northern Distributor Road (the NDR) or the Postwick Hub A47 interchange. It is a reconsideration only of those parts of the JCS which were remitted by the Judgment and Court Order, updated where necessary. For this reason, and the fact that my Examination is legally restricted to only those submitted policies and proposals in the Plan itself, I did not agree to requests from various participants to widen the scope of my Examination to other adopted or proposed policies and proposals.
10. The Plan is part of the strategic planning framework established for the Broadland, Norwich, and South Norfolk districts in the adopted JCS, and provides the strategic locations for the remaining required housing and employment up to 2026. It is not a 'stand-alone' Plan, but instead inserts text and diagrams into the adopted JCS. It is accompanied by an evidence base including technical reports and studies, topic statements, checklists, and a Sustainability Appraisal (SA). It forms part of a suite of development plans which are currently being prepared, including various site allocation plans and a Growth Triangle Area Action Plan in Broadland District.

Assessment of Legal Compliance

11. Three key areas concerning legal compliance are at issue in this Examination, and I deal with them below.

Duty to Co-operate

12. Section s20(5)(c) of the 2004 Act requires that I consider whether the Councils complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation. This requires the Councils to co-operate and engage constructively, actively and on an on-going basis with neighbouring planning authorities and other prescribed bodies when preparing development plan documents with regard to a strategic matter.

13. The GNDP has prepared a 'Duty to Co-operate Statement' [SDJCS 16] which summarises how the Councils have co-operated with other Local Planning Authorities (LPAs) and with the additional bodies prescribed in Regulation 4 of the 2012 Regulations. As I have said, the Plan consists of those parts of the adopted JCS which were remitted back – that is, those proposals which were sent back to the Regulation 19 publication stage. The adopted JCS predates the introduction of Section 110 of the Localism Act and so its proposals were not subject to the Section 33A duty to cooperate because the duty does not apply retrospectively.
14. The production of this Plan was undertaken by the GNDP, and this Partnership includes not only the three Councils named on the front cover of my report, but also Norfolk County Council, the Broads Authority, and statutory consultees. I was told [SDJCS 16] that the GNDP operates in an "environment of comprehensive and long term cooperation" between not only the members of the GNDP, but also with other authorities and statutory consultees. The Plan's proposals have been a matter for discussion and debate at officer meetings of the Norfolk Strategic Planning Group, and at other meetings.
15. All surrounding LPAs to the GNDP (North Norfolk, Great Yarmouth, Waveney, Mid-Suffolk, Suffolk County, Breckland and King's Lynn & West Norfolk) have been consulted on the Plan and, with the exception of Breckland, Suffolk and the Broads Authority, there have been no issues raised. Those latter three named LPAs have not raised any objections. Although the involvement with councils outside the GNDP has been mainly at officer level, councillors (particularly Leaders of Councils) have also had opportunities for positive and constructive engagement.
16. In relation to the relevant Regulation 4 bodies, all relevant bodies have been engaged - some in more detail than others, dependant on the extent of their involvement in the Plan's infrastructure proposals.
17. In the above circumstances, I consider that during the preparation of the Plan the GNDP, including the three Councils, has engaged constructively, actively and on an ongoing basis on the Plan's strategic matters by means of various processes which have maximised its effectiveness. Additionally, I bear in mind that the Plan's remitted proposals were well publicised and debated over a number of years, not least during the 2010 public examination of the JCS proposals. I am also mindful that there has been no objection from neighbouring LPAs or Regulation 4 bodies concerning the overall level of development proposed. I therefore conclude that the Plan complies with the legal duty to co-operate in the Act.

Public consultation

18. This Plan is unique in the way it has had to be prepared because it was sent back by the Court Order to the 'publication' stage only, after which it was then submitted to the Secretary of State for examination. Therefore, there were no 'issues and options' or 'draft proposals' stages in its preparation upon which the public could be consulted. The Statements of Community Involvement (SCIs) concerning those earlier stages of plan preparation

consequently do not apply, and so there was no requirement for there to be any public meetings or exhibitions. The requirement was for the Plan to be open for representations for a period of 6 weeks, and this was done in accordance with the SCIs by public advertisements, individual notices and letters to stakeholders, and by making the documents available on the web, at council offices and in libraries [SDJCS 7]. I was also told that Broadland District Council published a news item about the Plan and the consultation in its newspaper, which was delivered to local residents.

19. In addition, I consider that the GNDP made a commendable effort to explain a complex matter in a short format to all relevant interested parties, particularly to members of the public. This was done by, firstly, publishing a short 6 page summary [SDJCS 2], with fuller details in its accompanying schedules and appendices. And, secondly, by a 12 page non-technical summary (with maps) of the SA process of re-examining reasonable alternatives [SDJCS 3.1], which was the key reason for the High Court's remittance. For those interested in the Plan it would not have been very difficult to understand what had happened, what was proposed, and how the decisions had been taken.
20. Overall, I am satisfied that the public consultation requirements for this Plan were fully and properly carried out. The Plan complied with all UK legislation in this regard, and therefore it also complied with the relevant Articles in the Aarhus Convention (a consideration mentioned by one representor) because effective public participation was carried out.

Sustainability Appraisal

21. The GNDP reconsidered the SA as required by the Court Order, but some parties said that not of all the reasonable alternatives for major development areas had been examined. I consider later the evidence for housing numbers in my Issue 1 soundness assessment where I conclude that the Plan, and thus the SA, has correctly assessed the amount of housing needed. One of the early conclusions in the screening process was that a floating small sites allowance of 2,000 was appropriate for the Broadland part of the NPA, which left 7,000 new homes to be located elsewhere within the whole NPA. I agree.
22. Given the above, the SA looked at 11 potential growth locations at three different scales of strategic growth and 7 potential combinations of those locations in order to accommodate the 7,000 dwellings and 25 hectares of employment land over the plan period. Overall, I am satisfied that the SA established the proper strategic scope for the consideration of what might be possible reasonable alternatives.
23. Three growth locations were selected as being the reasonable alternatives that were to be tested through the full SA process. However, some representors queried whether the SA had examined all the reasonable alternatives that were possible, and a number of suggested sites were put forward which, in combinations, were said to be reasonable alternatives. However, I do not consider that any of them could be described as being reasonable alternatives. I explain immediately below why this is so for the

main alternative suggestions which were put to me in detail at the hearings but, for the avoidance of doubt, I agree with the GNDP's reasons as set out in SDJCS 7 for the unfavourable assessments of the other suggestions made by representors.

24. There was no convincing evidence that the combination of areas suggested by the Norwich and Norfolk Transport Action Group and the Green Party (partly within the Plan area and partly to the south-west of Norwich) would actually provide the required numbers of homes, or that in the south-west the development would not cause an unacceptable impact on the form and character of the existing settlements (which was the SA's conclusion regarding major development here).
25. Landstock Estates Ltd (with others) suggested additional dwellings partly within the Plan area, partly in the Wymondham area, and partly in the Hethersett/Little Melton area (or alternatively as a floating allocation). It was accepted by them that this was only an example, or a demonstration, and that it was not a detailed, fully worked up alternative. It has similar problems as the alternative proposed by Norwich and Norfolk Transport Action Group and the Green Party – that is, there was no convincing evidence that the dwelling numbers proposed could in reality be provided, and no evidence that the potential unacceptable environmental impacts on the character and setting of the existing settlements to the south-west of Norwich could be avoided. In addition, all participants agreed that there would be a shortage of secondary school places in Wymondham, but there was no clear solution which would resolve that issue (mainly because of disagreements over the numbers of school places required), and the possibilities put forward for resolving the shortfall were not accepted by the Local Education Authority or the High School (which is an Academy).
26. The above points are sufficient on their own for me to conclude that all these alternatives are not reasonable ones. But in addition, they do not include provision for the NDR. The NDR is an adopted scheme of the County Council (the Highway Authority); it is a fundamental part of the Norwich Area Transportation Strategy, the Norwich Area Transportation Strategy Implementation Plan, and Norfolk's Third Local Transport Plan; and it has been subject to SA/Strategic Environmental Assessment in these documents. The NDR also forms an integral part of the adopted JCS (e.g. in Policy 9) to which this Plan contributes. The NDR is consequently in the infrastructure baseline of this Plan's SA, against which the environmental effects of any development alternatives have to be assessed. Thus the lack of provision for the NDR in these suggested alternatives adds weight to my unfavourable assessment of them.
27. Irrespective of any flooding concerns that might limit development, Acle does not lie within the NPA, which is where the adopted JCS says that any major growth should be located (Policy 9). As it does not comply with the policy locations in the adopted JCS for major growth areas it is not a reasonable alternative.
28. The above examples of development locations illustrate the difficulties faced by both the GNDP and representors in identifying reasonable alternatives to

assess in the SA. The requirements and objectives of the adopted JCS and the Plan, and the varied possible permutations of development locations make the task a difficult one. I consider that the SA has carried out that task rigorously, logically and clearly. The three reasonable alternatives selected were the only ones which might have the potential to meet all of these requirements, objectives and base parameters. The GNDP has given good and sound reasons for the selection of the reasonable alternatives and why other alternatives were not reasonable ones; it has carried out a fair and public analysis of those three selected reasonable alternatives (see below); and its constituent LPAs have given clear reasons for the final selection of the preferred option, Reasonable Alternative 1, for the Plan's proposals.

29. One of the Plan's environmental objectives, set out in the SA, is to "adapt to and mitigate against the impacts of climate change" (ENV 6). One of the key factors in this is greenhouse gas emission, of which vehicle carbon dioxide emissions form a significant part. The Green Party said that these had not been properly considered in the SA and produced its own vehicle carbon footprint assessment at the hearings.
30. The GNDP produced a hearing note [DV 45] which summarised how carbon emissions from vehicles had been dealt with in the SA. The GNDP accepted that it was not clear how the preference conclusions in the SA on the three alternatives had been reached from the evidence base, particularly as these aspects had been considered under both SA Objective ENV 1 (*"reduce the effect of traffic on the environment"*) and Objective ENV 6.
31. An Addendum to the SA was therefore produced which showed how the three chosen reasonable alternatives differ in their impacts on the environment through transport related greenhouse gas emissions. This was done by considering factors such as proximity to employment (by walking and cycling), proximity to services in Norwich City Centre, and proximity to potential high quality public transport routes (in particular Bus Rapid Transit). I consider these to be an equally robust method of assessing this factor as the spread sheet calculations suggested by the Green Party which were, by its own admission, fairly crude and which might provide a false sense of mathematical precision. Whilst it is possible to suggest other qualitative and quantitative ways [MOD17 & MOD18] in which such evidence can be dealt with, the Addendum deals with the matter of greenhouse gas emissions in a proportionate and satisfactory manner.
32. I am satisfied that the SA now clearly shows how the three reasonable alternatives perform in terms of greenhouse gas emissions, and that Reasonable Alternative 1 still remains the best one so far as this factor is concerned.
33. The Addendum to the SA also assesses a Main Modification (**MM2**), namely an additional Policy 22 to ensure the delivery of housing land (see later). It concludes that it would be less than ideal because growth could come forward in a more dispersed fashion and there could be more growth overall. However, this is outweighed by the key consideration of providing decent, suitable and affordable homes (SA objective SOC4) and the fact

that any additional allocations could well be limited in scale to that necessary to overcome short-term delivery issues.

34. Representors questioned whether the SA correctly assessed sustainability issues/objectives relating to water quality, air quality, environmental amenity (e.g. noise, vibration and visual intrusion), designated historic assets (e.g. Conservation Areas, Registered Historic Parks and Gardens and listed buildings) and access to key employment locations for the reasonable alternatives. The GNDP considered that its analysis of these issues was appropriate, but the SA Addendum now makes it absolutely clear how they were assessed.
35. Overall, I conclude that SA, with the Addendum, has been properly and correctly carried out. I consider that it rectifies the deficiencies identified in the 2012 Court Judgement and that it complies with the Court Order.
36. My examination of the compliance of the Plan with all the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Schemes (LDSs)	The Plan is identified within the adopted LDSs of Broadland (2012 – 2015), Norwich (October 2012) and South Norfolk (January 2013) which set out an expected adoption date of August 2013. The Plan's content and timing are compliant with these LDSs, although the hearing adjournment from May to July and the need to publish and consult on the main Modifications and SA Addendums have set back the expected adoption date, but this slippage is acceptable in the circumstances.
Statements of Community Involvement (SCIs) and relevant regulations	The SCIs were adopted in October 2008 (Broadland), January 2007 (Norwich) and February 2007 (South Norfolk). Consultation has complied with their requirements, including the consultation on the post-submission proposed Main Modifications.
Sustainability Appraisal (SA)	SA has been carried out and is adequate, as set out above.
Appropriate Assessment (AA)	The AA dated February 2010 applies to this Plan, having been carried out for the adopted JCS. This Task 2 AA concluded that it was highly unlikely that the then JCS policies (which included those in this Plan) would have a significant direct or indirect impact on European and Ramsar designated sites, subject to certain caveats. Since then some of those caveats have been included in the adopted JCS. It was reconsidered in July 2012 as part of this Plan's preparation, and Anglian Water, the Environment Agency, Natural England and the Councils all agreed that it remained unchanged. I agree. The Water Resource Availability Study of June 2012 Addendum

	<p>to the AA has demonstrated that the existing licensed resources supplying the Greater Norwich area are sufficient to serve projected development beyond 2015. In addition, further work on the resolution of the longer term water resource requirement is progressing, and Anglian Water has put forward a number of potential solutions for the next Asset Management Plan covering the period 2015 to 2020, but the final solution will not be confirmed until it publishes its final Water Resources Management Plan in 2014. This is acceptable.</p> <p>A similar assessment was carried out for the Main Modifications and came to similar conclusions – that is, they are highly unlikely to have a significant direct or indirect impact on European and Ramsar designated sites. Natural England agreed with this conclusion, and so do I.</p>
National Policy	The Plan complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategies (SCS)	Satisfactory regard has been paid to the SCSs of the GNDP constituent authorities, including that of the County Council.
2004 Act (as amended) and 2012 Regulations.	The Plan complies with the Act and the Regulations.

Assessment of Soundness

37. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings, I have identified three main issues upon which the soundness of the Plan depends.

Issue 1 – Does the Plan make appropriate provision for the effective delivery of the overall amount and location of new housing required, having regard to national policy, and is it soundly based, fully justified and supported by an up-to-date, credible and robust evidence base?

Overall level and location of housing

38. The adopted JCS requires 37,000 homes and 27,000 jobs to be delivered to 2026. The Court Order does not affect the total housing numbers or the distribution of housing and employment in the adopted JCS, other than that in the Broadland part of the NPA. At issue, therefore, is the housing originally identified in the adopted JCS for the Broadland part of the NPA (a total of 9,000 homes with a further 3,000 beyond the plan period) and associated employment (25 hectares).

39. The GNDP carried out an assessment of housing numbers to test whether the requirements of the adopted JCS were still valid [SDJCS 14 and 14.1], including the latest Government Household Interim Projections of April 2013

- [TP 13]. This concluded that local evidence (including an update to the Strategic Housing Market Assessment calculations) showed that the adopted JCS housing provision still sat well within the latest regional and national population projections and a range of estimates of housing requirements. The GNDP also provided the latest (July 2013) update to the East of England Forecasting Model, an economic forecasting tool [DV 36] which produced figures at the lower end of the range.
40. This conclusion on housing numbers was challenged by various parties, some arguing for lower and some for higher numbers. However, I am not convinced that the adopted JCS figure is so wrong that the amounts of housing proposed in this Plan need to be reduced or increased. This is not an exact science, and population projections are just that – projections. The GNDP figures indicate that the adopted JCS total still lies comfortably within the range of various projections based on completion extrapolations, affordable housing requirements, and population and economic figures [Table 1 of SDJCS 14 and TP 13].
41. Windfall housing development is not included within the adopted JCS 37,000 homes total, and it cannot be included because no evidence was submitted to show that it will continue to be a reliable source of supply as required by paragraph 48 of the Framework. I accept that windfall development would make the housing total higher if it continues at current rates (Table 1 of SDJCS 14 estimated that it would result in 42,000 homes). I also accept that the adopted JCS housing total does not lie at the bottom end of the range of projections. However, housing targets are not a maximum number, and the Government's policy in the Framework is to boost significantly the supply of housing (paragraph 47). Moreover, there is no evidence to indicate that there are good planning reasons to restrict the proposed housing numbers in the Plan area, even if windfall development is included.
42. It was alleged that there was a backlog or shortfall in the provision of housing numbers in the adopted JCS that had to be made up in this Plan. I have already referred above to the possibility of an increase in total numbers due to the fact that windfall development is not included - this introduces an important element of flexibility. In addition, the housing numbers in the adopted JCS are based upon, and slightly exceed, the now revoked May 2008 Regional Strategy totals which, with the previous Regional Planning Guidance for East Anglia of 2000, had taken account of housing backlogs during those plan periods. And the Strategic Housing Market Assessment (and its updates) included an allowance to meet the affordable housing backlog (although there are practical difficulties in achieving it) in the adopted JCS. I have seen no convincing evidence that there is any significant housing backlog or shortfall either now or in the adopted JCS that cannot be accommodated by this Plan.
43. The GNDP has had regard to a range of population projections, some of which are higher and some lower than the adopted JCS target. I do not consider that the submitted evidence shows that the housing numbers in this Plan, which is for only a part of the adopted JCS total, need to be decreased or increased. In any event, as the GNDP said in evidence, the

question of increasing or decreasing housing numbers in the adopted JCS for the whole NPA (and other areas) is a matter for a future review of that Plan if monitoring later reveals there to be a problem.

The viability of the proposed development areas

44. The GNDP prepared a paper which tested the financial viability of the proposed development in the Plan [DV 22], guided by paragraphs 173 to 177 of the Framework and the Harman Report of 2012 (*Viability Testing Local Plans*) [DV 14]. Infrastructure costs were based on the emerging Local Investment Plan and Programme (LIPP), the expected operation of the Community Infrastructure Levy, the various policy requirements in the adopted JCS, and the public funding of the NDR. The testing was carried out using a number of site typologies which represented a range of development sites that might come forward in the Plan contributing towards the delivery of the housing and employment development proposed.
45. I appreciate that there are limitations to this type of work, and that the results are very sensitive to factors such as sales values and affordable housing targets. Nevertheless, the work has been carried out following the Harman Report methodology and it represents robust evidence based on the best information presently available. So, despite accepted limitations, I am satisfied that this financial testing shows that the developments proposed will be viable for developers and that there is likely to be sufficient viability to incentivise willing landowners to make the sites available for development. There are no financial reasons to presently doubt the Plan's deliverability.

Infrastructure delivery

46. The GNDP has engaged with infrastructure providers throughout the preparation of the Plan and it has refined the proposals accordingly, particularly in terms of delivery timelines. There are some housing and employment specific infrastructure requirements, but these are proportionate and should not hamper delivery. Appendix 7 in the adopted JCS lists the infrastructure needed to facilitate development, and the Plan inserts those items required for its proposals, primarily taken from the latest LIPP, and it includes matters such as costs, phasing, funding sources and delivery dates.
47. The LIPP is an evolving document and its latest version is therefore just a 'snapshot' in time of the likely requirements. The latest LIPP is different from the information in the submitted Plan, and other infrastructure needs have become clearer over time. Moreover, Appendix 7 as submitted is difficult to understand and to find in it the infrastructure requirements for the Plan's proposals because they are intermingled and are not specifically identified. In order to be effective (by being up-to-date and clear), two modifications are necessary. Firstly, **MM6** sets out a revised Appendix 7 which clarifies that it only applies to those adopted JCS proposals outside the Broadland part of the NPA, and which deletes the submitted infrastructure projects related to the Plan's proposals. And, secondly, **MM7** provides a new Appendix 7a to the Plan which separately (and thus clearly)

lists the infrastructure required for this Plan's development, based on the most up-to-date information available.

48. The infrastructure listing in modified Appendix 7a is as comprehensive as present information can make it, sets out which parts of the proposed development would be affected, and is based on credible information provided by statutory undertakers and other involved stakeholders. I agree that funding details of schemes should be consistent in requiring developer "contributions". It will no doubt change in the future, and the GNDP is committed to regularly updating the LIPP to accommodate those changes.
49. One of the key infrastructure provisions, and one of the key causes of uncertainty in the Plan, is the NDR with its associated Postwick Hub junction onto the A47. The GNDP told me that failure to deliver improvements to the Postwick Hub junction to the proposed timetable (i.e. side road orders to be confirmed by late 2013 and open by mid-2015) may start to impact on delivery by 2015/16. Failure to deliver the NDR to its proposed timetable (i.e. the consent process completed by early 2015, and open by spring 2017) may start to impact on delivery by 2017/18. I understand that there is some limited scope for flexibility to these timetables as a start to elements of the constrained development may be possible during the construction phases of the NDR and Postwick Hub, but the work has not yet been done to quantify the exact amount. The Secretary of State exercised his powers in August 2013 [DV 55] under section 35 of the Planning Act 2008 to direct that the NDR be treated as development for which development consent is required (i.e. it will be treated as a "nationally significant infrastructure project"), which was a pre-requisite of keeping to this timetable.
50. I was told that the finance was in place for the NDR and Postwick Hub by a combination of Government funding and 'top-up' funding underwritten by the County Council. The schemes are both at relatively advanced stages (see above, and Postwick Hub has planning permission), and both have been costed and designed to a high level of confidence. I am satisfied that that there is a high probability that the schemes will be funded, and that they are likely to be implemented. It is apparent that every effort is being made to keep to the above timetable.
51. Much doubt was cast on these projects during the hearings, most of which was related to the need for schemes and/or to the possibilities of alternatives. But these are not matters for me to decide or to make a judgement upon in the context of this Examination, which is limited to the submitted Plan. As I have said, the NDR is already included in the Norwich Area Transportation Strategy, the Norwich Area Transportation Strategy Implementation Plan and Norfolk's Third Local Transport Plan, where it has been subject to SA/Strategic Environmental Assessment – and it also forms an integral part of the adopted JCS. Such concerns and suggestions can only be resolved through the various statutory processes for both these schemes.
52. There was some confusion amongst participants at the hearings (and myself) concerning paragraph 7.16 and its table as to where, and what

amount of, development could be permitted before the NDR is constructed and/or without the improvements planned for the Postwick Hub junction. So the Plan would not be effective and would therefore be unsound because of this confusion. The GNDP suggested new text in **MM1** to replace paragraph 7.18 and its table which makes the development amounts in these circumstances clear and the Plan sound.

53. I discuss later the Plan's ability to respond to rapid changes as required by the Framework, such as the possible failure of, or delays in the implementation of, the NDR and Postwick Hub. Overall, I conclude that the infrastructure requirements have been adequately assessed and that, as at the date of my Examination, the Plan's proposals can be delivered so far as the necessary infrastructure provision is concerned.

The Housing Trajectory and additional Framework 'buffer'

54. The submitted Plan contained a Housing Trajectory in Appendix 6 which has not been fully updated from the adopted JCS for the Broadland part of the NPA. Consequently it is out-of-date and unrealistic in that it shows housing deliveries in the past which have not actually occurred, such as at Rackheath eco-community. During the Examination the GNDP provided a series of Statement of Common Grounds with various landowners and developers in the NEGT area; new evidence on permissions granted and resolutions to grant permission; the improving housing market in the area; the build out / delivery rate at Rackheath (up to 230 dwellings per year with delivery from 2017/18); the earlier delivery of the North of White House Farm site; and other additional units in the East Development area of the NEGT [DV 21, 23, 28, 35 & MOD4]. This is all credible evidence.
55. As a result, the GNDP suggested a modified Housing Trajectory (**MM5**) which, in summary, shows a slower rate of growth in the NEGT in the earlier part of the plan period and a faster rate in its latter part than that in the submitted version. I consider this to be a realistic Trajectory both in terms of likely economic recovery times and in rates of delivery. Associated modification **MM3** makes clear that the existing Appendix 6 in the adopted JCS is out of date, and **MM4** deletes growth locations and the now incorrect totals in the adopted JCS Appendix 6 Trajectory, referring users to the new Appendix 6a (**MM5**) for the housing proposals in this Plan.
56. Of relevance to the Housing Trajectory are the questions of the 5-year housing land supply (and thus whether there needs to be deliverable sites at the beginning of the plan period) and whether the LPAs have persistently under delivered (PUD) in terms of Framework paragraph 47, thereby requiring a 20% 'buffer' rather than a 5% 'buffer' of deliverable housing sites. The Plan forms an integral part of the adopted JCS and covers the Broadland part of the NPA as a continuation and fulfilment of the adopted JCS. Policy 9 and paragraph 5.22 of the adopted JCS indicates that the purpose of the housing growth planned in the adopted JCS is to ensure that growth needs arising from the Norwich urban area are addressed as close to it as possible, i.e. within the NPA. The table on page 43 shows the distribution of growth between the NPA and the remaining parts of Broadland and South Norfolk and Norwich (paragraph 5.22). Therefore I

consider that these two questions have to be considered over the geographical area of the NPA as a whole. None of the hearing participants dissented.

57. However, the GNDP argued that this was merely the first step of a sequential approach to housing land supply, and that the second (final) step would be to consider the supply over each of the individual LPAs' area which include the NPA. The GNDP said that if that second step showed there was a 5-year land supply (plus 'buffer') then that would be acceptable even if there was none over the whole NPA. This second step was disputed by some representors.
58. Unfortunately, the adopted JCS, of which this Plan only forms a part, is unclear on this point. Whilst this is a joint Plan, there is no joint LPA (all of the constituent GNDP councils are still individual LPAs) and so the table accompanying paragraph 5.22 breaks down the total housing allocations into numbers for each of the three LPAs for implementation and monitoring purposes.
59. In support of this point the GNDP said that various submitted NPA planning appeals showed that Inspectors had considered the question of the 5-year housing land supply over both the whole NPA area and the individual LPA within which the particular appeal site was located. However, I do not see any of my colleagues saying in those appeals that this was the correct sequential methodology. Rather, they had merely dealt with the figures presented to them by the parties and, in nearly all cases, had concluded that whichever set of figures was used (the whole NPA or the individual LPA area) there was not a 5-year housing land supply.
60. Like my colleagues in those appeals, I do not think that I have to come to a decided view on the GNDP's 'sequential' land supply assessment point in order to conclude on the Housing Trajectory's soundness. This Plan is concerned only with the Broadland part of the NPA, and whether the NPA is considered as a whole, or just Broadland District, or just the Broadland part of the NPA, the GNDP's own figures for these three areas show that there is not a 5-year housing land supply in any of them using the existing deliverable sites [Appendices 1, 3a and 5 of DV 21]. The latter two Broadland-only areas have worse land supply figures than that across the whole NPA. I was not presented with any other 5-year housing land supply figures which showed that there was a satisfactory supply if other factors (such as recent permissions or resolutions to grant) were taken into account. For completeness I say now that I give little weight to the GNDP's 'emerging sites' housing land supply figures, and I set out the reasons for that conclusion later on in paragraph 68.
61. On PUD, the GNDP produced evidence which looked back over a reasonable time period (13 years) in order to give a fair, balanced and broad picture before the economic downturn (around 2007/8), since when general national economic factors have prevented the LPAs from delivering well. I consider that, for these reasons, this was the properly chosen time period for the PUD assessment.

62. Other alternative PUD calculations were based on backdating housing requirements in later adopted plans and then adding the backlog or shortfall to the housing requirement. I reject this approach on a number of grounds. Firstly, it is unreasonable and unfair to retrospectively apply housing targets in plans which were at the time only in draft and to which relatively little weight could be attached under national policy guidance. A plan can only come into legal affect as part of the statutory development plan on adoption. It is only on, and from, this date that it forms part of the development plan for the area. It is common practice for councils to backdate the plan period to reflect the base date for the plan and its evidence base (particularly the Strategic Housing Market Assessment), but this is only the statistical period on which the plan is founded. The LPAs at the time would have been heavily, and rightly, criticised for assessing yearly housing targets in their monitoring reports against those draft plan targets.
63. Secondly, those adopted plans included in their future housing targets for the adopted plan period an element of backlog for past under delivery. Therefore, to include that backlog again in PUD calculations would be to introduce the likelihood of double counting.
64. Therefore, I accept the GNDP's evidence on this question as being the more reliable of those presented to me. It shows a cumulative over-delivery in all the years from 2000/01 to 2009/10, and only since then has there been under delivery ranging from 2.8% to 12.4%. In these circumstances, I agree with the GNDP that a PUD Framework buffer factor of 5% is appropriate (i.e. a 5.25 year housing land supply) as persistent under delivery has not been shown under normal economic circumstances.
65. As I have said, whatever way the figures are calculated there is not currently a 5.25-year housing land supply. It was suggested that planning permission is a pre-requisite for inclusion in the 5.25-year supply calculation, but I agree with the GNDP that it is not. There is no doubt that to be delivered a site must enjoy the benefit of planning permission. Footnote 11 of the Framework confirms that there could be circumstances when sites with planning permission may not be deliverable but, conversely, there may be sites without planning permission which are appropriate and available now and which could be delivered within 5 years.
66. There is not a preferred answer to how past shortfalls should be handled - the two most common ways put to me were the 'Sedgefield' and 'Liverpool' approaches. In this case I agree with the GNDP that the shortfall should be added to the housing delivery target over the plan period because the JCS was only adopted in 2011 and it deals with that particular problem over the plan period (i.e. the 'Liverpool' approach), and this Plan forms part of it.
67. The GNDP's 'existing' figures in Appendix 1 of DV 21 would have to be revised downward as windfalls have been over-estimated [Appendix 1 of DV 35] and because the King Street (St Anne's Wharf) site in Norwich is not deliverable [DV 49]. Bearing these points in mind, the GNDP said on the last day of the hearings that its figures in Appendix 1 of DV 21 would give an NPA land supply of around 4.4 years of the 5.25-year requirement. Representors said it would be less [Table 3.2 of DV 32]. So it does not

matter whether the backlog or shortfall should be added over 5 years, 5.25 years, or 6 years – the fact is that there is not an adequate housing land supply as required in the Framework.

68. The GNDP argued that some 'emerging' sites should be included which would increase the supply. However, I am not fully convinced that they are deliverable given that the plans allocating the sites have not yet been examined (some are at Preferred Options stage), and that for some sites there are unresolved objections (paragraph 216 of the Framework). I was not given enough information to enable me to give varying degrees of weight to the different sites as part of a potential deliverable supply. I therefore give the emerging sites supply figures little weight.
69. The Plan's modified Housing Trajectory in **MM5** takes into account the above factors and I recommend it to make the Plan sound. However, due to infrastructure constraints, it would only start to effectively deal with the problem of the housing land supply shortfall after two years from its anticipated adoption. Moreover, it is dependant on the various site allocation plans currently being prepared by the three district councils coming forward as planned [as Table 3 of DV 21] and on the infrastructure being provided in the Broadland part of the NPA, particularly the NDR and the Postwick Hub junction. There are doubts about the timing and deliverability of all of these, and so the Plan's ability to respond to rapid change has to be considered. This is especially critical because there is not presently an adequate housing land supply.

Flexibility to adapt to rapid change

70. Paragraph 14 of the Framework requires plans to have sufficient flexibility to adapt to rapid change. As I have explained, the deliverability of critical infrastructure and the delivery of sites through Local Plans are not entirely certain and so the Plan has to address the consequences of a possible shortfall in the 5.25-year housing land supply, including possible contingency arrangements, in order to be sound. Unfortunately, the Plan's only answer is for a review of the whole JCS if there is no possibility of the timely construction of the NDR (paragraph 7.18), which would be a lengthy and time consuming process. There is no provision for a quicker and less complex method of dealing with deliverability problems, particularly for less critical delays in infrastructure provision. A delay or failure in the Broadland part of the NPA would probably mean that alternative housing land would have to be provided elsewhere in the NPA, although any policy should not rule out other new sites in the Broadland part of the NPA [DV 33].
71. I was assured by the GNDP that the NDR and the critical infrastructure would proceed according to the stated timetable, and that the housing would be delivered as set out in the modified Housing Trajectory. Thus, the GNDP Councils have nothing to fear from a modestly framed flexibility policy because, as they told me, it is unlikely to ever have to be implemented in practice. Such a policy is only a safeguard to ensure an effective Plan should the worst case scenario occur.
72. But there is no doubt that a policy is needed – all parties accepted this

point. Delay has already occurred in delivery from that anticipated under the adopted 2011 JCS's Housing Trajectory. And this Plan proposes a significant amount of housing within a small geographical area by a number of developers, much of which is dependant on major infrastructure works. I acknowledge that the Housing Trajectory shows the majority of delivery in the later period of the Plan, and I take this into account in setting the 'triggers' for the new policy. I also place great weight on the Government's policy to boost significantly housing supply, and its requirements that LPAs should provide in plans, and demonstrate over the plan period, a continuous 5-year (plus buffer) housing land supply (Framework 47 & 49).

73. There were no 'oven-ready' large sites brought to my attention that were deliverable and so available to be written into the Plan as 'reserve' sites to ensure housing land supply in the event of a shortfall. This means that a new, focussed housing Local Plan would have to be prepared to find alternative housing sites (and any other associated development to serve the housing), and this might take two or more years. Therefore, critical to any flexible policy to deal with rapid change is the matter of the 'triggers' for when any such remedial action would have to be started.
74. I am not convinced for three main reasons that a new Local Plan needs to be started immediately, or even within a year [MOD10], in order to find alternative sites as some representors urged. Firstly, I consider that the LPAs have done a considerable amount of work in pursuing the NDR, Postwick Hub and other infrastructure requirements and in preparing various site allocation plans to the timetables submitted to the Examination. There is no indication yet that these are likely to significantly slip, and there is at least some inbuilt flexibility in the Plan for additional housing development if they do. Secondly, to start a new plan so quickly would divert scarce staff resources away from existing important work on the site allocation plans which are needed to ensure that development takes place on time.
75. Thirdly, it will take at least two years for the Plan to start to meet the 5.25-year housing land supply requirement [Appendices 1, 3a and 5 of DV 21 and **MM1**] as deliverable permissions cannot be released any quicker. Therefore, any work on a housing Local Plan should be delayed for that two year period in order to give that process time to come to fruition. After this, if annual monitoring reveals that the required housing land supply (plus the appropriate 'buffer') has not been achieved, then a Local Plan would need to be quickly prepared to find alternative housing sites in the NPA to cover the period until any delays (for whatever reason) have been resolved. The time it would take for preparation means that any new Local Plan cannot, as the GNDP suggested, wait for the shortfall to be shown "*through three full years annual monitoring reports*" [DV 17 & MOD4], or to wait for the major housing developments to be implemented [MOD4], because by then the shortfall could be very large and possibly beyond repair.
76. I do not believe that a series of specific triggers related to the delay of itemised infrastructure projects (e.g. the NDR) [DV 16 & MOD10] would be sufficiently rigorous because this would not be flexible enough to deal with all of the possible causes of shortfalls. For instance, delays might happen in

combination, or knock-on side effects may cause unanticipated delivery problems, or delays might occur in other infrastructure projects which might not have been detailed in the policy. What is important here is whether the housing land supply is not being maintained for any reason. I consider that a 10% under supply in the 5-year supply (plus appropriate buffer) in any relevant monitoring report would be a reasonable trigger level because of the need for quick action in the event of any shortfall, and because it was a percentage level generally accepted by hearing participants.

77. The calculation of housing land supply should be consistent with national policy (Framework 182) and so calculating it to fit the supply details set out in the modified Housing Trajectory would not be sound [MOD4]. Such details change over time, particularly the specifics of what is actually deliverable. Obviously, any housing Local Plan would need to ensure that it did not prejudice the delivery of planned strategic infrastructure, so it is not necessary to write it into the policy as the GNDP suggested [MOD4].
78. I therefore recommend **MM2** and its new Policy 22 in order to make the Plan sound by being effective and consistent with national policy. I do not think it necessary to include the Plan's employment allocation in the new Policy 22 as its provision is mainly dependant on the delivery of the housing allocations in Policy 9.
79. The Plan should make clear that it complies with the Framework's presumption in favour of sustainable development, which would also assist in maintaining an adequate housing land supply. A new Policy 21 in **MM2** follows the wording of the Inspectorate's model policy and makes the Plan sound by making it consistent with national policy. Recommended **MM2** main modification also contains some additional text to explain the reasons for the two new Policies 21 and 22.

Overall conclusion on Issue 1

80. Consequently, taking account of all the evidence, statements and submissions, and having examined all the relevant factors, I conclude that overall the housing totals and modified Housing Trajectory represent a realistic, balanced, deliverable, justified and soundly based set of figures which would meet the objectively assessed housing needs over the plan period. Moreover, **MM1** and **MM2**, would render the Plan sound by making it effective and consistent with the requirements of national policy.

Issue 2 – Does the Plan make appropriate provision for employment land, and is this soundly based, effective, and consistent with national policy?

81. The Plan adds additional text to Policy 9 of the adopted JCS for the additional housing discussed above and also for around 25 hectares of new employment land at Rackheath to serve the local employment needs of this whole major growth location. The Rackheath Eco-Community proposal within the Plan area was identified by the Government in a supplement to Planning Guidance Planning Policy Statement 1: Eco-towns, and its 2009 Concept Statement included nearly 23 hectares of employment land in order

to achieve the required mixed use community with employment provision.

82. The justification for this amount was derived from a 2008 Employment Growth and Employment Sites and Premises Study, which has not been updated. The GNDP said that although the take-up of employment land has been slow, the 2012 East of England Forecasting Model [SDJCS 14.1] suggested even stronger job growth of 33,000 than that provided for in the adopted JCS of 27,000 jobs.
83. However, the 2013 East of England Forecasting Model [DV 36] shows a reduced jobs growth of around 20,200 over the plan period, below the level in the adopted JCS. I was told that this did not take account of major jobs growth in areas such as the Norwich Research Park via the Government's City Deals programme for Greater Norwich (which aims to create economic growth and jobs), and overflow from off-shore related development from the Great Yarmouth and Lowestoft areas. I accept that the Model is only a 'trend' projection, and that this additional information shows that the economy is likely to grow more than the Model indicates. Therefore, I conclude that the evidence base for a 25 hectare employment land allocation is a reasonable one as a basis for further detailed work to be carried out in the Growth Triangle Area Action Plan. The employment land amount is thus a sound and effective strategic allocation which is consistent with Government policy.

Issue 3 – Are the arrangements for monitoring the policies of the Plan effective and soundly based, including the indicators, delivery mechanisms, timescales and targets/milestones used?

84. Appendix 8 of the Plan contains the Monitoring Framework, but it does not include the 'suggested indicators' in the SA's Table 7.1 [SDJCS 3.2] or a monitoring indicator for Policy 22. These render the monitoring ineffective and unsound. The GNDP recognised this problem and submitted an amended monitoring Appendix 8 as a suggested change (**MM8**).
85. The revised monitoring Appendix 8 shows for each aspect of this Plan when, what and by whom a list of identified actions will take place to ensure effective delivery. This will enable transparent and effective monitoring. 'SMART' targets have been set having regard to the availability of data and available resources. This main modification is reasonable and appropriate, and I recommend it to secure soundness in terms of effectiveness.

Other issues

86. Concerns were raised about flooding, water supply and possible water contamination, but no evidence was submitted. GNDP's evidence, however, was that these issues were capable of resolution (primarily in the detail of future proposals), and that there were no strategic reasons on these grounds why this Plan's proposals would cause any of the alleged problems. I agree with the GNDP's views and the similar views of its statutory consultees, particularly that of Anglian Water.
87. Local people were concerned about traffic through the village of Wroxham

on the A1151 Wroxham Road where it converges on the bridge between Wroxham and Hoveton, but no evidence was submitted to substantiate it, and nor did the Highway Authority object. The GNDP's response was that the construction of the NDR, the focus of growth on Norwich, and the provision of services and facilities within the proposed housing areas would mean that growth in this location would not directly pressure the A1151. The outputs from the Norwich Area Transportation Strategy Model showed very low traffic increases over Wroxham Bridge. I accept that there will be some increase in outward commuting and in leisure trips to the Broads and the North Norfolk Coast, but there was no evidence that these would create a danger to highway safety or significantly interrupt the free flow of traffic along this road.

88. Other issues were raised in the representations and at the hearing sessions which do not go to the heart of the soundness of the Plan. In many cases, detailed "improvements" to the Plan were suggested. Having considered all the other points made in the representations and at the hearing sessions, I consider that there are no further main modifications needed to ensure that the Plan is sound in the terms of the Framework and associated guidance.

Overall Conclusion and Recommendation

89. The Plan has a number of deficiencies in relation to soundness and legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the assessment sections above.
90. The Councils have requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Joint Core Strategy for Broadland, Norwich and South Norfolk, the Broadland Part of the Norwich Policy Area Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

David Vickery

Inspector

This report is accompanied by the Appendix containing the Main Modifications

**CAMBRIDGE LOCAL PLAN AND SOUTH CAMBRIDGESHIRE
LOCAL PLAN EXAMINATION IN PUBLIC**

MATTER 5

INFRASTRUCTURE / MONITORING / VIABILITY

APPENDIX 5

SUBMITTED BY

NICK ANDERSON AND ALEX KEENE (AECOM)

Contents:

**Pages 1 -10 - Appendix E – Highway Network Performance from the
2013 CSRM Modelling Report's (RD/Strat/160)**

**Please note that the document is only being submitted because
Appendix E of the Modelling Report was not available within the
online resource and reference is made to it within the attached
statement.**

Appendix E – Highway Network Performance

Three highway performance analyses are presented in this appendix. These are:

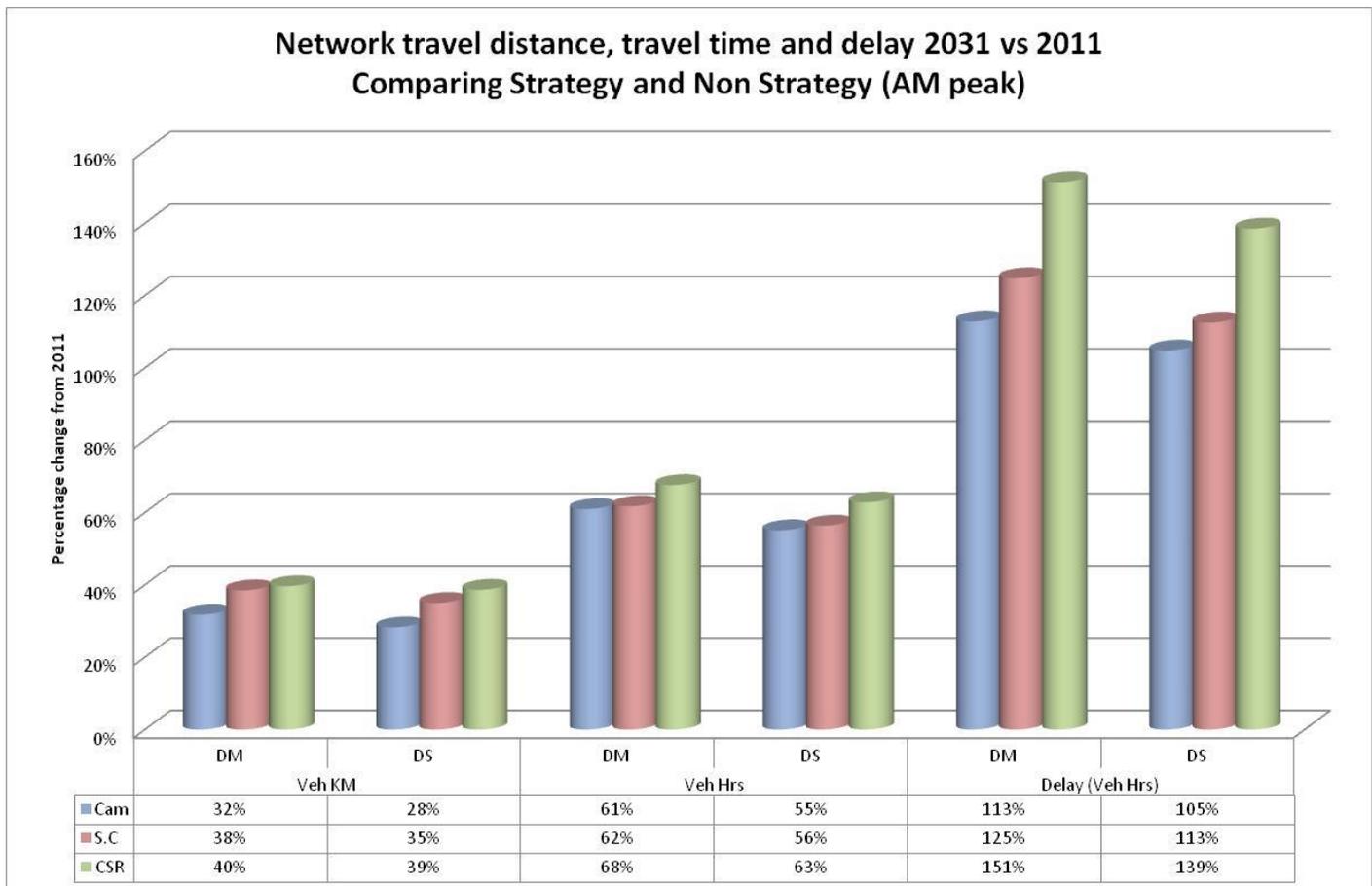
- overall highway network performance;
- identification of location and severity of forecast year junction hotspots; and
- changes in journey times for key routes and corridors.

The graphics relate to outputs taken from Cambridgeshire County Council’s highway assignment model for a 2031 forecast year that forms part of the Cambridge Sub Regional Modelling system.

Measure of overall highway network performance

Figure E1 shows the overall network vehicle distance covered, vehicle time travelled and vehicle delay incurred for 2031 AM peak compared to 2011 (the measure of “current day” conditions). This is separated geographically into Cambridge City (Cam), South Cambridgeshire (S.C) district and the coverage of the whole of the Cambridge sub region (CSR) as represented in the transport model (which is the four districts of Cambridge, South Cambridgeshire, Huntingdonshire and East Cambridgeshire but excluding Fenland). The analysis compares the existing 2011 base situation to the 2031 proposed South Cambs and Cambridge City Local Plan land use disposition. Tests were conducted “with” and “without” the proposed Transport Strategy measures. These scenarios are referred to as Do Minimum and Do Something scenarios, denoted DM and DS in the Figure E1.

Figure E1: Overall Network Statistics for 2031 compared to 2011



These forecast results indicate that the development impacts felt would be less severe in Cambridge and South Cambs than the rest of the sub region. The growth in delays, however, is symptomatic of a highway network operating at capacity on many links. The effect of the traffic growth is partly mitigated by the transport strategy which shows reduction in the level of delay experienced across all reported districts of around 10-12% in the most extreme case.

Junction Hotspots

Figure E2: AM DM 2031

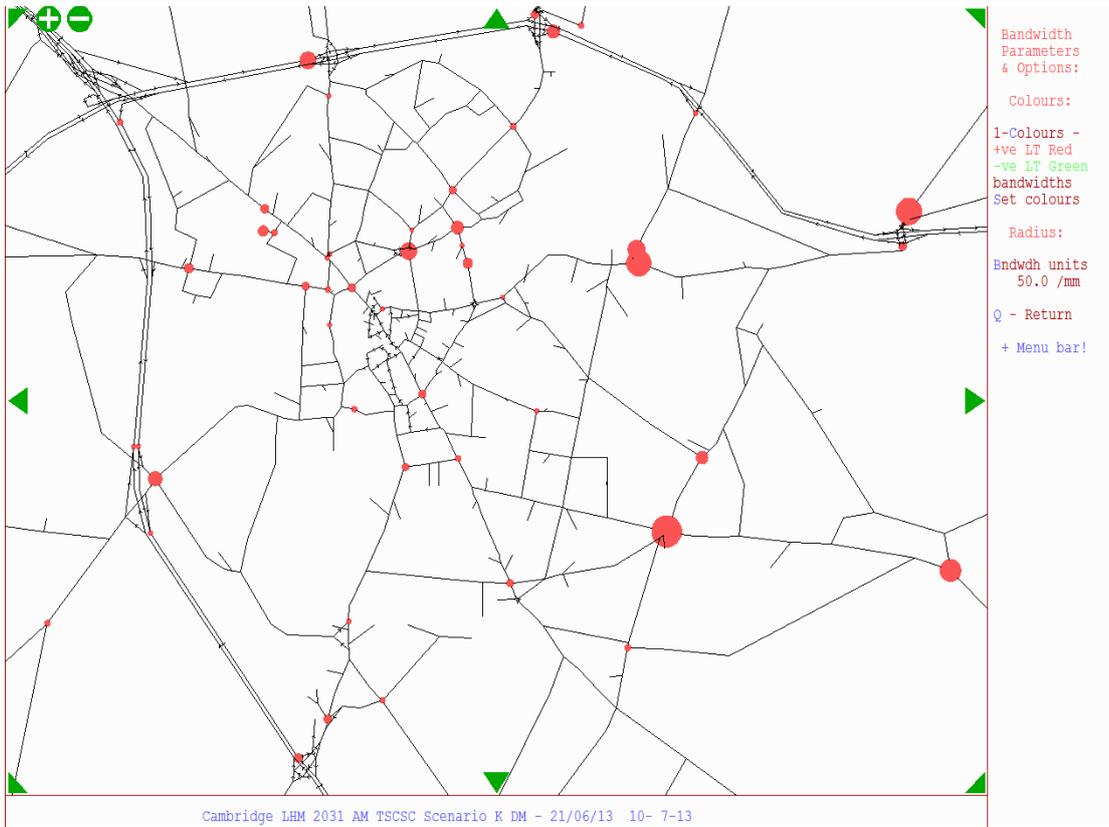


Figure E3: AM DS 2031

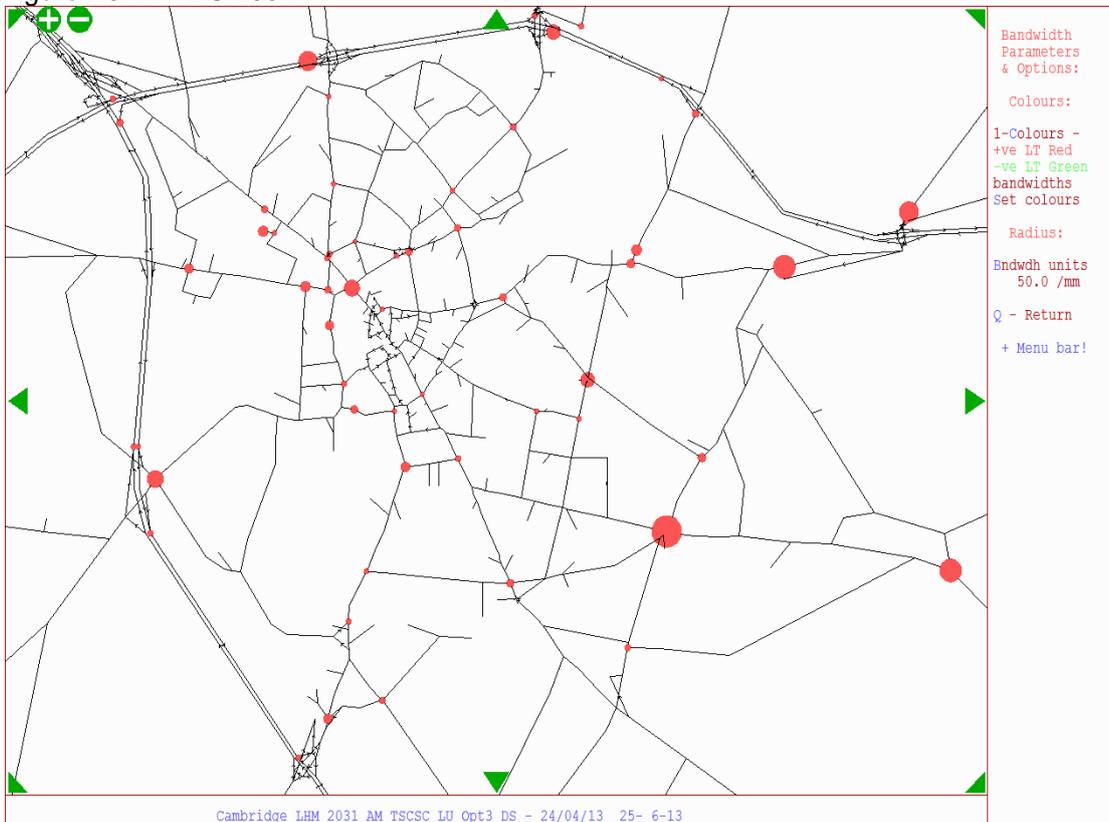


Figure E4: PM DM 2031

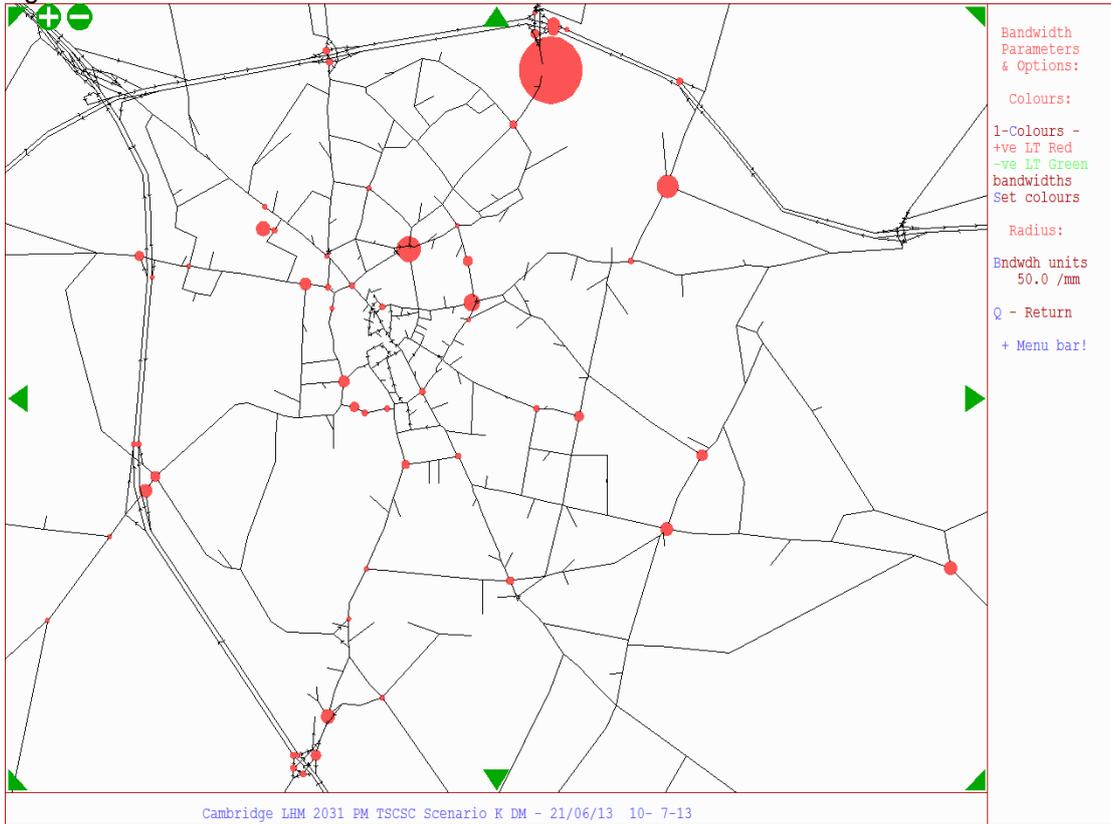
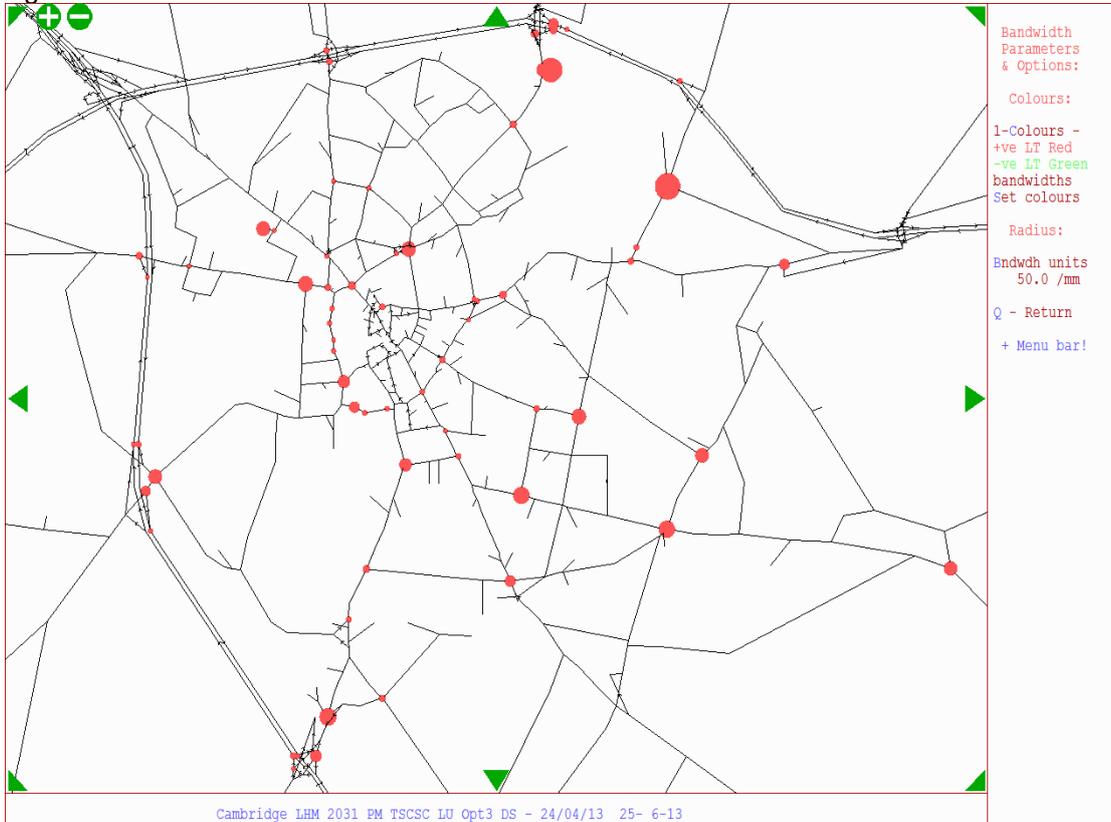


Figure E5: PM DS 2031



Figures E2-E5 are indicative maps of the scale and intensity of junction delay across Cambridge City in the 2031 forecast year at key junctions. The circles are representative of average delay per vehicle, where junctions are only annotated if the average delay is greater than 30 seconds per vehicle. Within Cambridge city, the severity of congestion is more acute in the PM peak than the AM peak, with a number of junctions showing considerable overload, particularly in the scenario without transport mitigation measures.

Selected Journey Time routes: Percentage change in travel time along highlighted route length
 Figure E6: Wide view AM peak 2011 vs 2031 DM

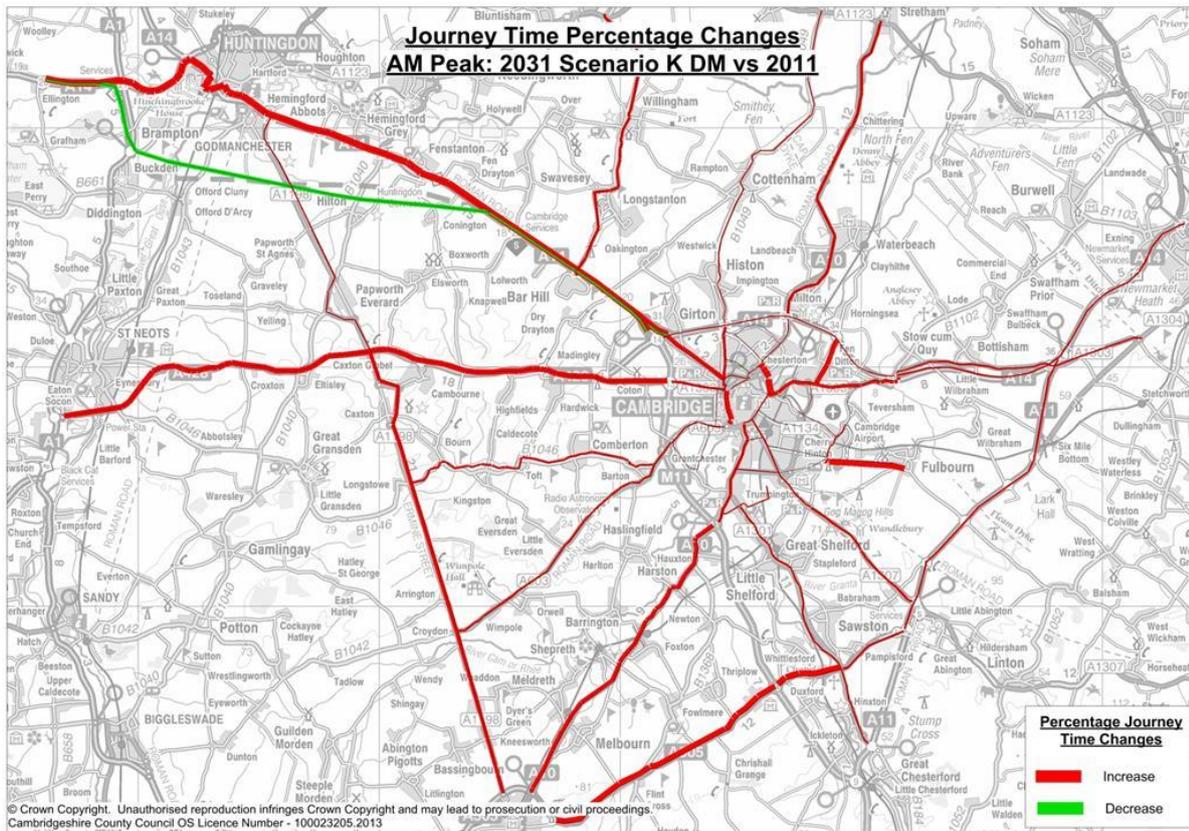


Figure E7: Cambridge centred view AM peak 2011 vs 2031 DM

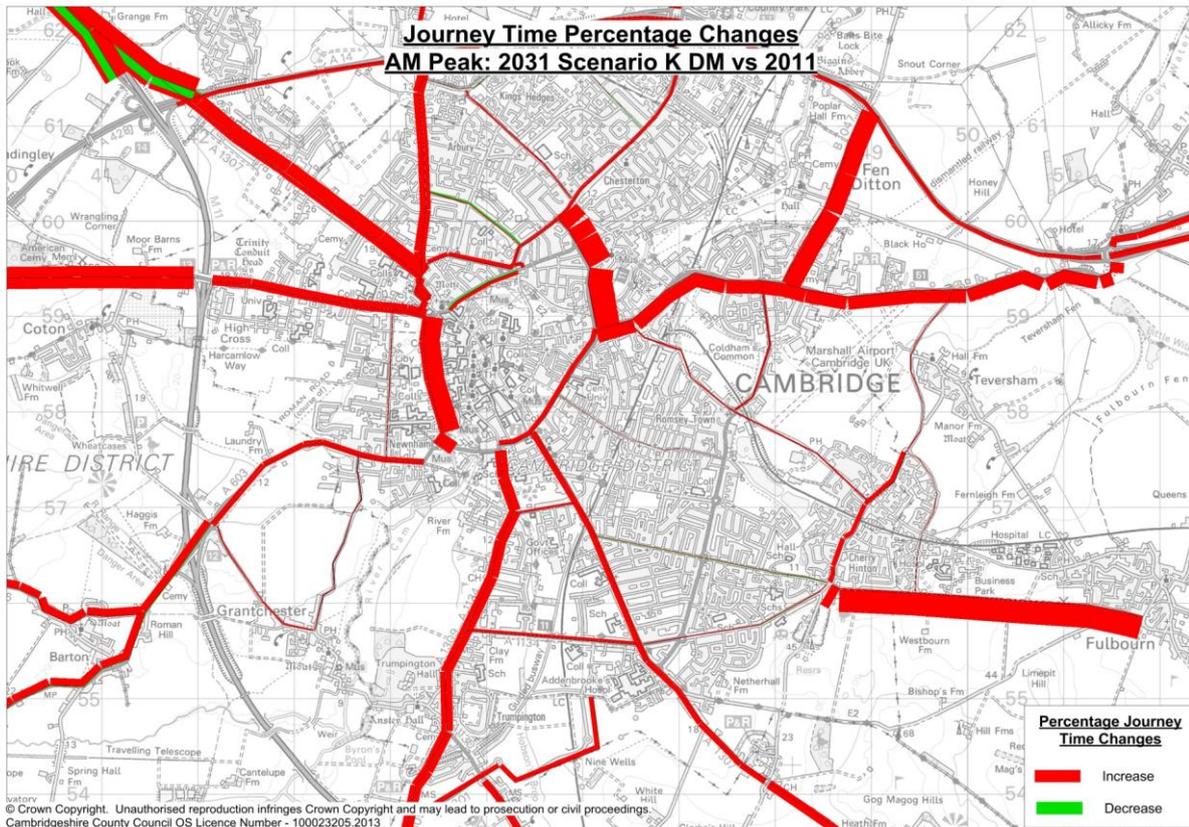


Figure E8: Wide view PM peak 2011 vs 2031 DM

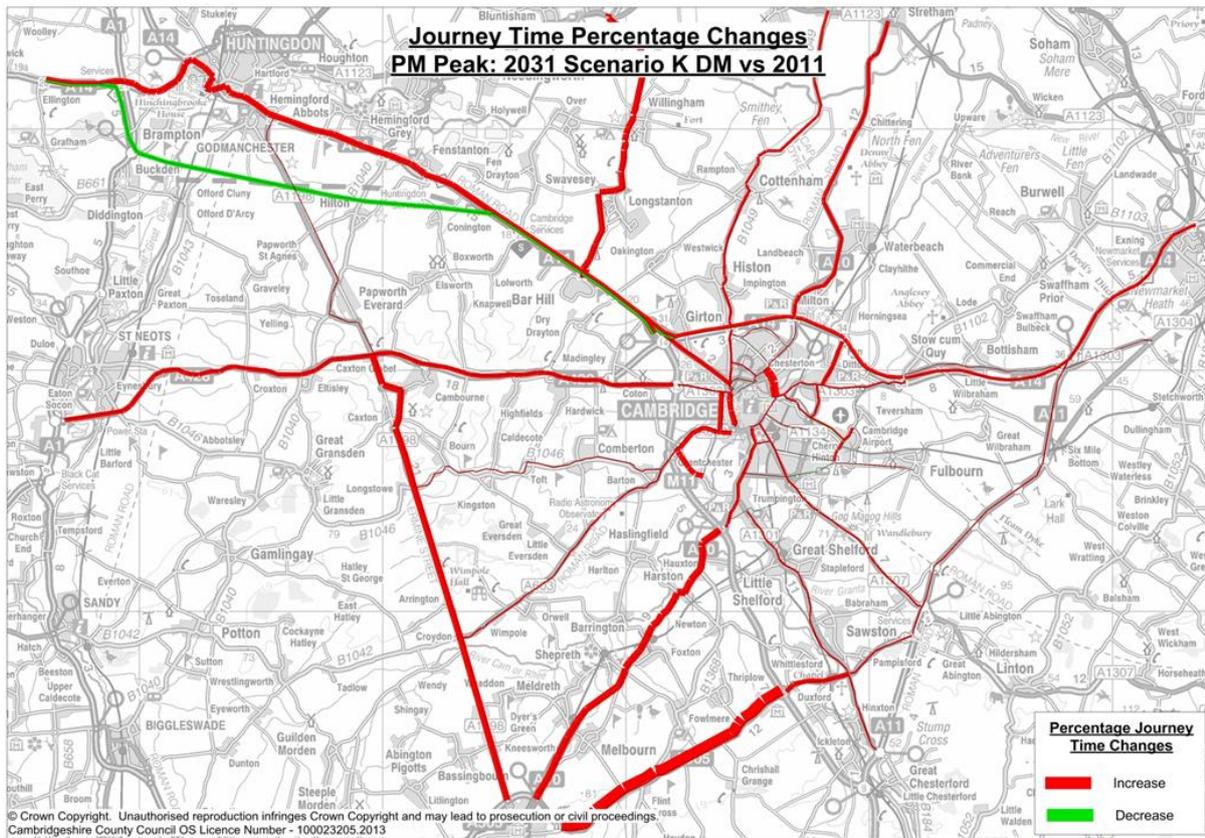


Figure E9: Cambridge centred view PM peak 2011 vs 2031 DM

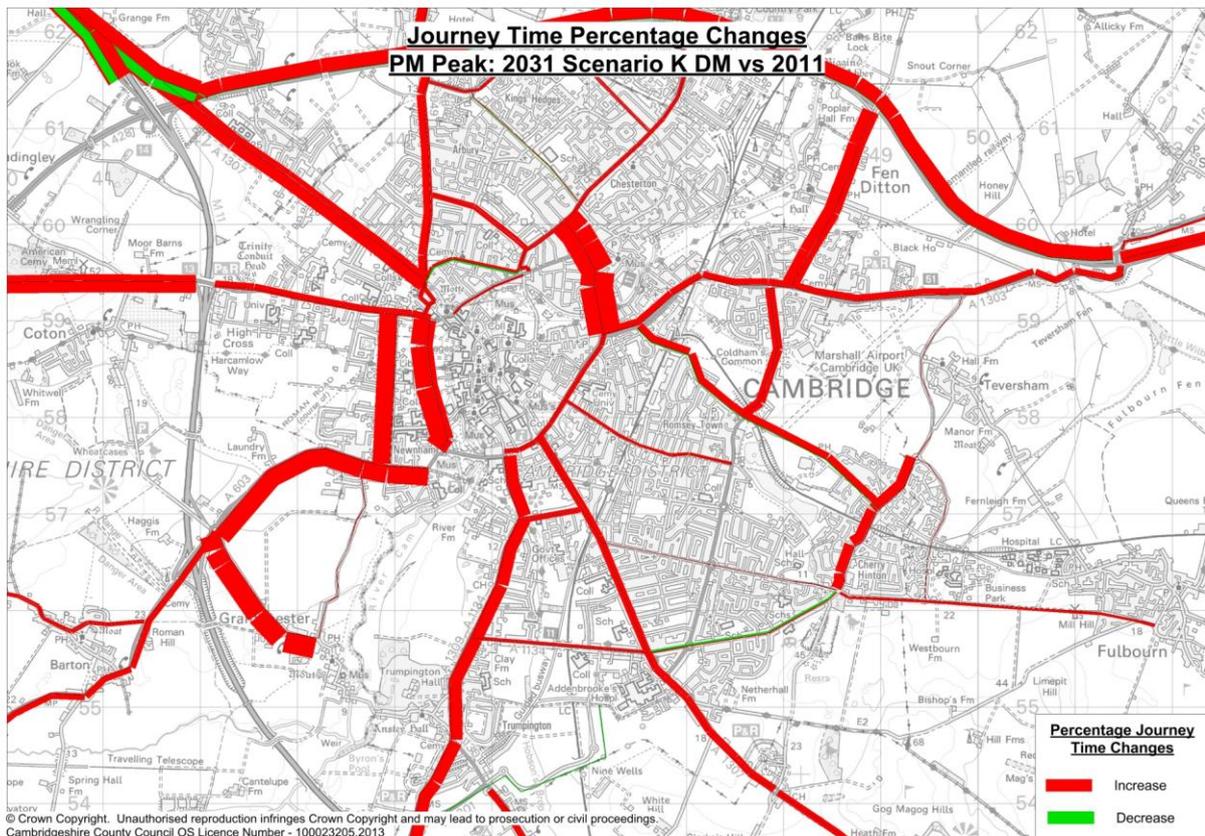


Figure E10 Wide view AM peak 2031 with Transport Strategy vs 2031 DM

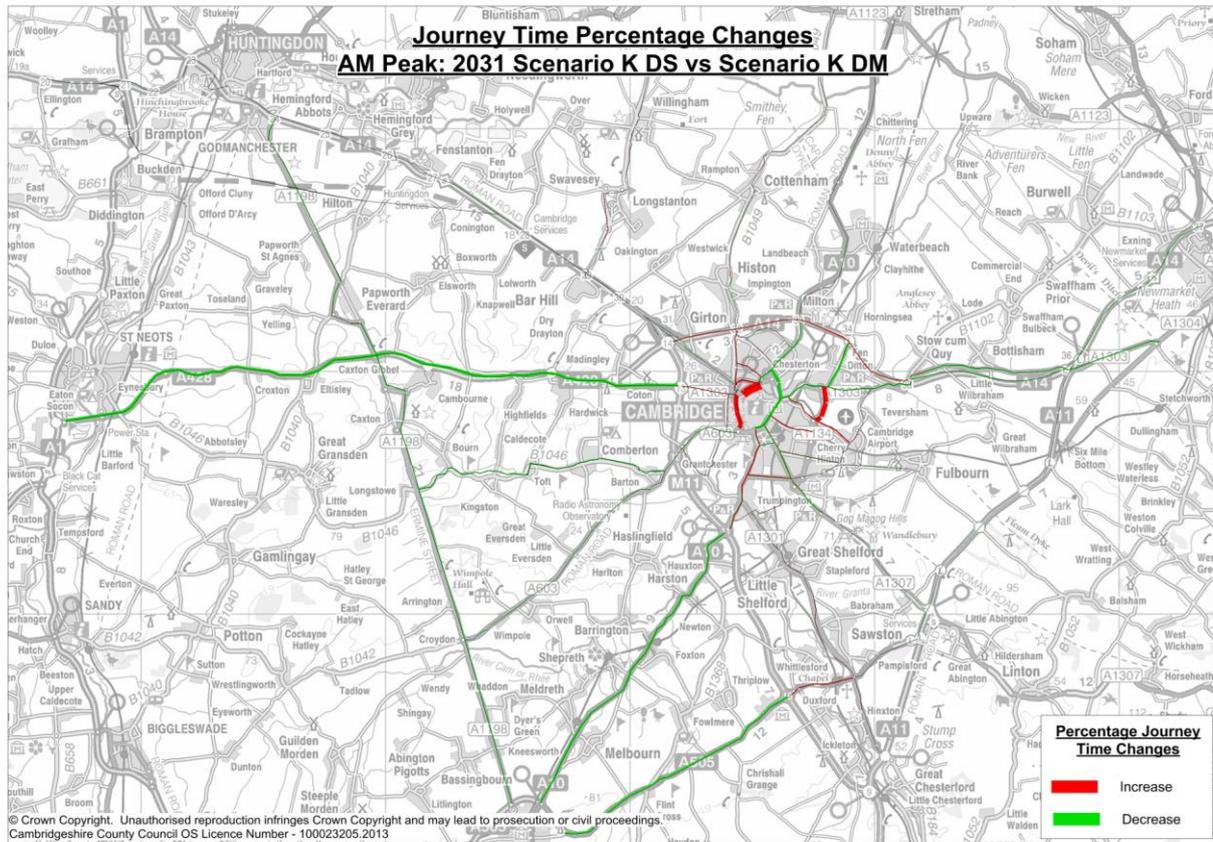


Figure E11: Cambridge centred view AM peak 2031 with Transport Strategy vs 2031 DM

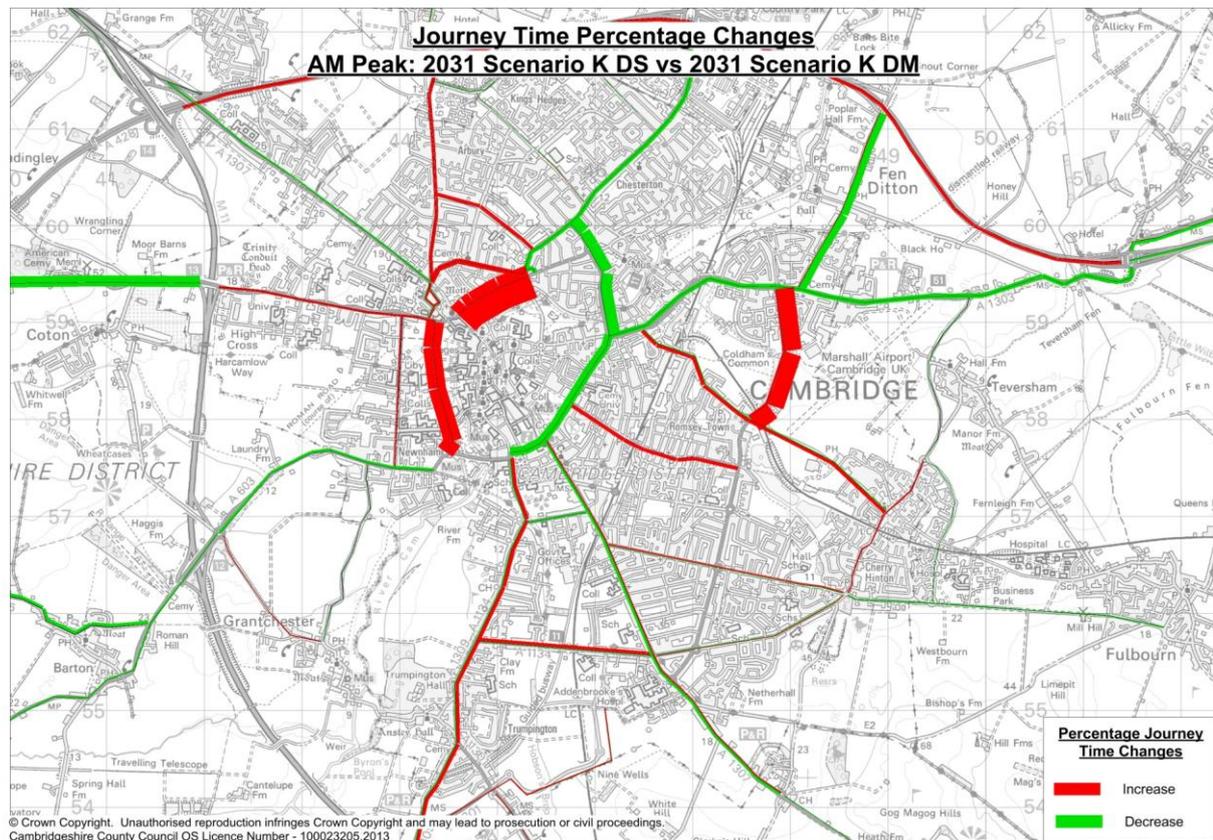


Figure E12: Wide view PM peak 2031 with Transport Strategy vs 2031 DM

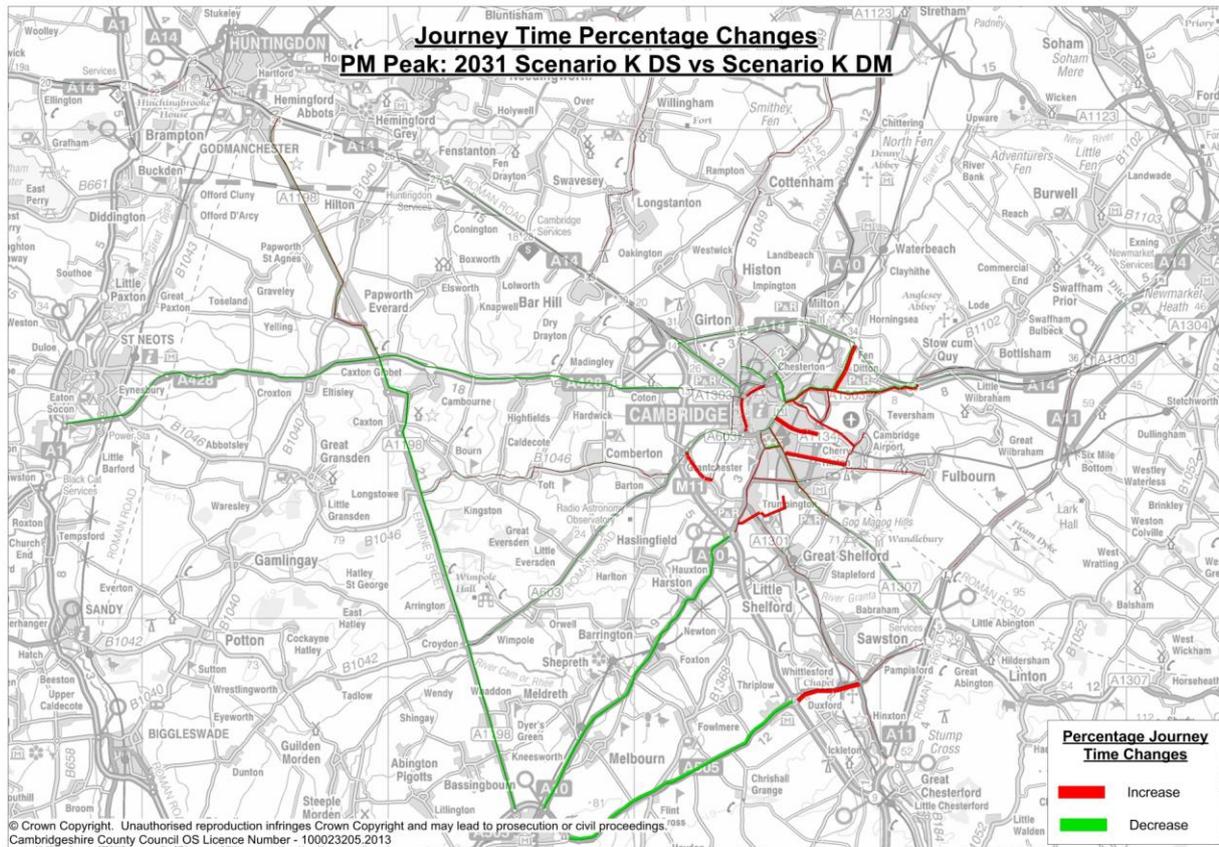
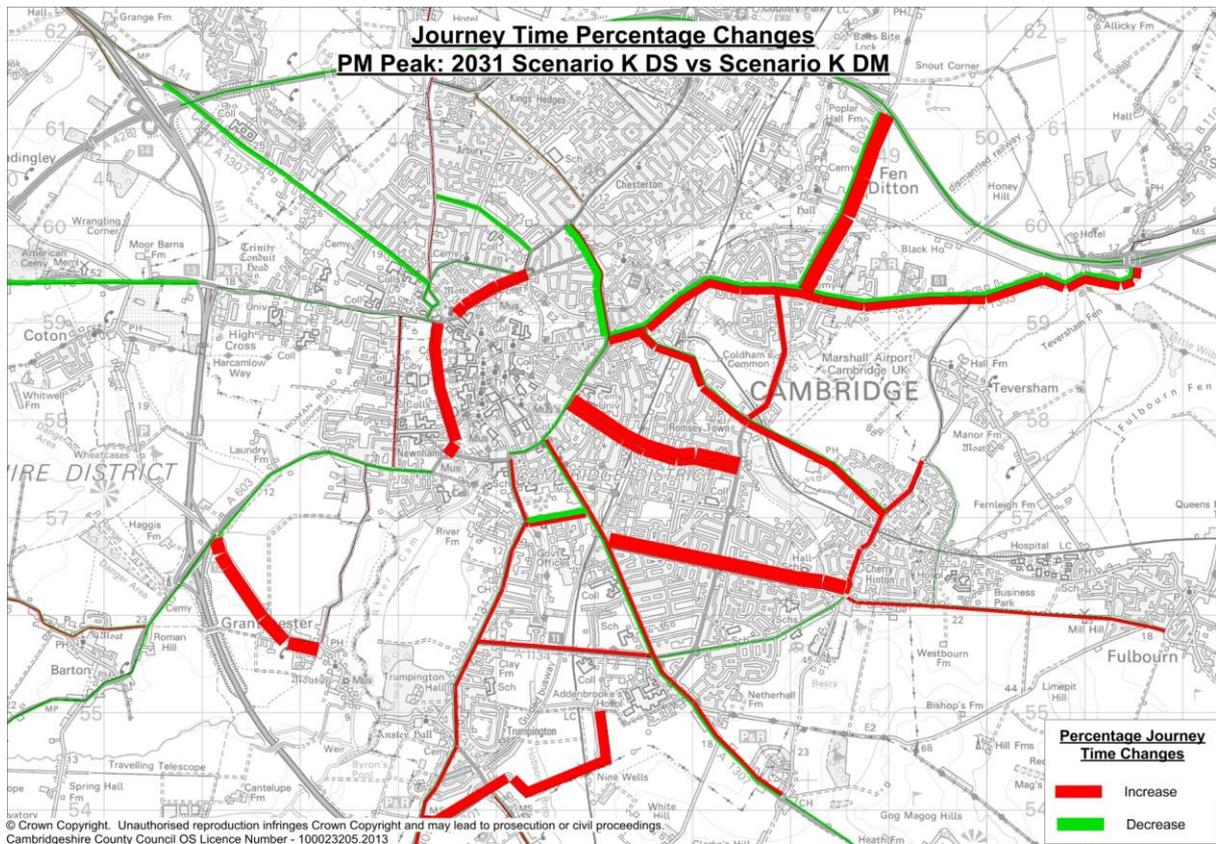


Figure E13: Cambridge centred view PM peak 2031 with Transport Strategy vs 2031 DM



Figures E6 to E13 show the percentage journey time changes along the entire length of selected routes with red showing a worsening of conditions and green an improvement.

It should be noted that where a link is not annotated that is not indicative that no change will occur, the figures have been created to show the effects on selected major routes and corridors only.

**CAMBRIDGE LOCAL PLAN AND SOUTH CAMBRIDGESHIRE
LOCAL PLAN EXAMINATION IN PUBLIC**

MATTER 5

INFRASTRUCTURE / MONITORING / VIABILITY

APPENDIX 6

PREPARED BY

NICK ANDERSON AND ALEX KEENE (AECOM)

Contents:

Figure 1 West Cambourne Walking Isochrone

Figure 2 Bourn Airfield Walking Isochrone

Figure 3 Northstowe Walking Isochrone

Figure 4 Waterbeach Walking Isochrone

Figure 5 Cambridge South Walking Isochrone

Figure 6 West Cambourne Cycling Isochrone

Figure 7 Bourn Airfield Cycling Isochrone

Figure 8 Northstowe Cycling Isochrone

Figure 9 Waterbeach Cycling Isochrone

Figure 10 Cambridge South Cycling Isochrone