

21st March, 2018

Dear Sir or Madam

Due to the extended and detailed nature of my representation please find this in letter format below.

I am making the comments set out in a personal capacity.

Yours sincerely,

Gail Mayhew

Representation on the GNLP

Note to Spatial Portrait

1 Reference should be made to the fact that Norwich has largest physical catchment of any English city with the exception of London. This is modelled by Space Syntax – work done for BEIS Future of Cities exercise.

This presents both an opportunity and problem:

- It reinforces Norwich's placing high in retail rankings relative to size.
- It intensifies traffic problems, which come to a head within the medieval city centre.
- Given the very wide catchment area and spread of population servicing the city adequately by public transport is challenging.
- Traffic movement is however highly predictable in comparison with other locations – which potentially presents an opportunity for public transit servicing.

2 Reference should be made to NNUH, Norwich Cathedral and Norwich Combined Courts alongside the universities (UEA & NUA) as key institutions ie which operate as critical 'anchors' to the city and county economy and culture, underpinning the city economy.

3 The spatial portrait should reference the economic geography of the wider region and in particular Cambridge as a locally/regionally important driver (or potential driver) of growth

4 The spatial portrait should recognize the opportunity for Norwich to benefit from the Cambridge growth phenomenon ie in attracting growth companies through a competitive cost base and quality of life proposition.

5 The spatial portrait should explicitly recognize the potential for Norwich to be linked to the Cambridge -Oxford rail based growth corridor (and onwards to Great Yarmouth).

Question1

AGREE with vision, but also DISAGREE, insofar as that this is insufficient to guide optimized development and infrastructure planning and delivery in the public interest.

The draft vision should also include a series of principles against which all development and infrastructure decisions should be tested – in line with the NPPF requirement to produce ‘sustainable development’ and the ‘right growth in the right place’.

The principles by which plans and development should be tested should be widely consulted upon in a separate exercise from the GNLP plan consultation, both with stakeholders and general public.

These could include eg:

- Carbon reduction
- Infrastructure efficiency
- Land use efficiency
- Resource efficiency (including cost in use)
- Local economic capture
- Place competitiveness
- Resilience
- Response to context (scale, massing, conservation area & character)
- Productivity
- Responsive development to issues of gender, age and equity of opportunity

Question 2

AGREE with broad strategic approach to plan outlined subject to

- a) **comments made with regard to Planning Principles proposition set out in relation to Question 1 (above), however I DISAGREE that the plan in itself is sufficient to secure the objectives set out.**

The Plan can only set a framework. The GNLP plan was a successful plan in planning terms however did not deliver against targets.

It is essential that if Delivery is to take place to meet the correct level of quality and numbers an additional interrogation needs to take place, namely how a *delivery vehicle* should be structured **to operate in the public interest** to operate as an interface between the planning aspiration set out in the plan and the short term, commercial drivers of property development market. This should be framed through discussion and consultation with key local partners namely, Building Growth, NALEP, Norwich City Council, Norfolk County Council, the Norfolk District Councils and Homes England.

- b) **I DISAGREE with the over intensification of Norwich city centre and believe that if the correct delivery mechanism were to be put in place for unlocking strategic land and infrastructure in the public interest, strategic and well connected sites that are already permissioned could be unlocked at a relevant level of density and activity to support a sustainable development approach.**

The Plan should directly address the tensions inherent in high level policy ie between the BEIS' Industrial Strategy and the DCLG Housing Strategy which place well connected city centre sites in competition on landuse.

It should equally address the need to value the important city centre heritage as an asset to take account of in, relation to the prioritization of greenfield versus brownfield sites for development.

The historic fabric of the city centre is a key asset benefitting both the City and County which drives considerable tourism and retail business. It is also part of Norwich's unique selling point as a location for business and personal relocation, and inward investment.

Present planning and development pressures could undermine the essential place competitiveness of the city if not tempered by a strong caveat relating to the preservation of mix of uses in Norwich city centre, and responsiveness of development to the historic city centre context.

- c) I also DISAGREE with the plan failing to take account of wider property market and economic drivers such as eg the influence of Cambridge on the county's geography, and failing to acknowledge and capitalize upon the potential of joining with Cambridge in promoting a Norwich-Cambridge-Oxford rail-based growth corridor.**

Question 3 - I support option JT1

OPTION JT1 - (forecast jobs plus additional growth)

HOWEVER I suggest that this will only be achieved if the points made on taking a broader overview of the economic geography of the county ie to include the Cambridge Growth phenomenon / opportunity of Norwich extension to the Oxford to Cambridge rail corridor, and the caveats around maintaining and enhancing place competitiveness are recognized and acted upon.

Question 4

I DISAGREE with the housing target

The GNDP permissioned sites against a high housing growth target imposed centrally.

This target has not been met through the current standard housebuilding process.

There is presently an 'overhang' of a very substantial number of planning permissions across Norfolk.

It is essential that action is taken to understand the causes of this, and to build out the currently permissioned sites before moving on to new allocations.

At point 2. above I set out the need for a parallel exercise to be undertaken to understand a) the nature and causes of the under-delivery against objectively assessed need, and b) to review and propose how delivery might be approached differently in the public interest, through bringing together the combine resource and access to capital of the Norfolk councils, Homes England and the LEP.

Question 5

I DISAGREE with the 'buffer ' approach

If a proactive approach to strategic land and infrastructure delivery were put in place this would not be required. Instead a 30 year land supply could be strategically planned for, which could be released on a phased basis to meet demand and need.

Question 6

I DISAGREE with the windfall approach

If a proactive approach to delivery were put in place this would not be required.

As a starting point there is a need to test whether OAN as currently computed is a true picture of demand and need. Fine grain property market analysis should be commissioned to better understand drivers of housing demand, need and the place potential of the Norwich housing market.

9. I DISAGREE with an approach to land use that favours one single land release option. This is overly simplistic and fails to play-in important viability, locational, economic development factors which are site specific.

The planning approach should instead adopt a set of robust principles of development and apply these both at the level of the land release/infrastructure model and on a site by site basis. SEE *BRE Information Paper IPX12 Smart Growth*.

This should further be underpinned by the creation of an urban spatial model for the whole county, which could interrogate the impacts of different option scenarios on a more accurate and interactive basis. A national spatial model has already been created via the work of the Cities Foresight project at BEIS and this should be tapped into on a Norfolk basis.

Thirdly a **strategic land and infrastructure entity** should be set up to take forward strategic land and infrastructure investment to unlock key strategic sites in the public interest and to take projects forward to such as stage that they are de-risked, developed to a stage of ‘investability’ to the property market, and with public interest objectives (eg infrastructure proposition, public realm, optimal land use footprint, community infrastructure, land value capture) hard-wired into the development planning from the outset and costed-in to the business model - not subject to negotiation.

Growth Model	Opportunity	Caveats / Implications
Concentration close to Norwich	<p>Some opportunity for brownfield and ‘greyfield’ intensification of uses in central city fringes in highly accessible location, however on mixed use land use model and respecting heritage city context and skyline, and at medium densities to support quality of life.</p> <p>Planned urban extensions of the city fringes should be prioritized for delivery ie at Broadland Gate (associated with the economic opportunity of the Broadland Business Park and Airport Business Park); in association with the UEA and NRP to create a world class ‘university village’; to the north city ie through optimization of the Royal Norfolk site, and related sites at Sweet Briar, and the Hellesdon Hospital; expansion and intensification fo Thorpe Marriot and other sites in vicinity of NDR (however on a planned and infarstructured basis).</p>	<p>Urban over densification will undermine place quality and place competitiveness of central Norwich</p> <p>Plenty of permissioned land on the urban fringes in well served locations – no need to over-densify.</p> <p>Highly accessible locations should be prioritised for economic and community infrastructure uses.</p> <p>Local/light rail movement infrastructure should be planned into edge of urban land release and infrastructure development model. (ie along Marriott Way; potential university connection, potential circular tram/train route from Broadland Gate onward to airport and Hellesdon (joining with Marriot Way).</p>
Transport Corridors	If a local rail network were reinstated to serve the	A road based ‘transport corridors’ growth model is unsustainable and

	<p>city/county, then a ‘public transit oriented’ land release model could be supported on environmental grounds, as well as to underpin investment in public transit infrastructure.</p> <p>This could include a combination of settlement expansion along key rail/light rail routes, and new settlements.</p>	<p>environmentally damaging and will lead to further congestion of Norwich city centre, undermining quality of life, quality of place and productivity.</p>
<p>Norwich- Cambridge Tech Corridor</p>	<p>This option should include an infrastructure proposition for the upgrade in service of the Norwich-Cambridge railway line (extending the principle of the Oxford-Cambridge rail link onward to Norwich).</p> <p>This could include the intensification development at settlements along the line whether through strategic urban extension and new settlement.</p> <p>The NE Growth sector could be tied in via an optimization of the Bittern Line service, new rail stop at Broadland Gate, and potentially via a rapid bus or tram/train connecting onward to Norwich airport.</p>	<p>This option ties in to and optimizes the economic opportunity presented by the Cambridge growth phenomenon, as well as existing investment/economic opportunity at Snettisham, Hethel and the UEA campus.</p>
<p>Dispersal</p>	<p>This is not a sustainable growth model, nor does it optimize place competitiveness nor economic opportunity.</p>	<p>It could actively undermine Norfolk’s place competitiveness through the addition of unsympathetic and under-structured housing estates at the edge of villages and market towns.</p>
<p>Dispersal plus New Settlement</p>	<p>This is not a sustainable growth model, nor does it optimize place competitiveness nor economic opportunity.</p>	
<p>Dispersal plus Urban Growth</p>	<p>This is a worst of all worlds growth model which fails to capitalize upon economic opportunities, delivers unsustainable and damaging growth in the countryside and over-intensifies development in the city centre to the detriment of place quality and economic opportunity.</p>	

Favoured option (subject to impact testing via proposed urban spatial model as discussed above) would therefore be a combination of **Urban Concentration** included regeneration of key city centre sites to an appropriate level of height and density given historic context and need to balance with economic and community infrastructure uses, and delivery of strategic urban extensions; in combination with **Norwich-Cambridge Tech Corridor** and **public transit oriented development along public transport growth corridors**.

The delivery of highly planned growth supporting a sustainable public transport-oriented growth model would allow for a highly rigorous approach to be adopted to the determination of applications on rural settlements such that these would need to demonstrate high levels of design quality and positive impact in terms of maintaining or adding to social infrastructure, and supply site specific housing demand/need.

10. The delivery of a sustainable growth model is impeded by the lack of a multi-modal movement Infrastructure strategy which includes the improvement of the Norwich-Cambridge rail service, the improvement of the Bittern Line to a 20-minute service and the reinstatement or creation of local & light rail lines with associated rail-based parkway into the county. A train/tram or planned BRT link from Broadland Gate to Norwich Airport is essential to underpinning modal shift in favour of a sustainable movement model.

This failure to address the potential of an upgraded rail network is also negatively impacting on Norwich City Centre with unacceptable levels of congestion, pollution and delay. BRT is not a solution (this was invented in Bogota with very wide boulevarded roads where lanes could be sacrificed relatively without impact to buses) in a city with medieval and victorian width streets.

11. A new town at Mildenhall, though out of county, should be considered as part of the wider regional growth picture.

The regeneration of Great Yarmouth (which under the Oxford-Cambridge-Norwich rail corridor would be at the end of this line).

12. New settlements should only be considered if there is a VERY strong spatial/market logic underpinning them. They must support/be supported by a sustainable movement infrastructure proposition, underpin land value capture to pay for the full range of movement and community infrastructure required to make them self contained, complete settlements. Full impact assessments required. (including market demand as opposed to OAN).

13 I support the establishment of a Norwich greenbelt. The three models highlighted are incomplete. A fourth approach would be to identify land of environmental and landscape importance in and around the city fringe and develop a landscape protection and management strategy which would become part of the city's 'place proposition'.

This would not constrain development but create a valuable setting for it.

A model for this approach is the London Commons which, in spite of the rapid 18th and 19thC growth of London, remained protected from development (as was Mousehold Heath in Norwich). An updated version could see the land held through a Community Land Trust (or The Land Trust) and management via a dowry created via CIL contributions raised from development. I would therefore support a 'Norwich Commons' approach as opposed to arbitrary greenbelt.

14 I agree with the extension of Norwich city centre – on a mixed use planned basis.

The current footprint of the city centre was delineated when the city was much smaller in population, with the city centre footprint roughly following the medieval city limit. The city never enjoyed

expansion of the urban core at higher density levels such as took place in cities which grew rapidly in the 18th and 19th centuries such as Edinburgh, Glasgow, Bristol. On the basis of a 'gap' analysis neither the size of the centre nor the scale of facilities are commensurate with other cities of a population of around 220,000.

The city centre should be enabled to expand however on a planned basis ensuring that a high level of urban design is embedded, provision of additional civic facilities and the correct balance of mix of uses. Heights and densities should be controlled such that new urban areas that emerge are complementary to and do not overbear the historic core of the city.

15 Norwich City Council should look for an exemption of the presumed change of use to residential on the same basis as was achieved by The Royal Borough of Kensington and Chelsea – and which has maintained the diversity and mixed use nature of that London borough.

A strong policy position should be adopted in the city centre to maintain the commercial component, such that development schemes should be required to re-provide commercial space and pursue mixed use development where residential is to be introduced. This can be justified in terms of the accessibility of the city centre to the widest population across the county ie making it the most sustainable location for employment and other civic uses, and underpinning equity of opportunity (in a county with very poor social mobility outcomes). A strong policy position favouring commercial and mixed use development in the centre can further be justified on the basis of the relative availability of un-built out and permissioned land on the city fringes – ie relatively accessible/sustainable locations.

I support the principle of agglomeration of office space in the centre, benefitting from accessibility of access and co-location with other complementary uses.

Consideration of how a 'premises ladder' can be provided to support businesses at each stage of business foundation through early stage growth towards maturity should be given. Pricing is critical in supporting early stage businesses as well as easy in/out terms. This may need to be supported via local authority guarantees, grant or access to long term funding at competitive rates.

17. Norwich should continue to support its policy of promoting city centre retail, however should temper this with the encouragement of secondary retail areas to emerge (on a street-based urbanism basis) to provide new local high streets to service growth areas on a sustainable basis and not in competition with the centre.

Speciality retail areas should also be allowed to emerge on a place basis, as has been encouraged at the Norwich Lanes and Magdalen Street.

18. The focus of late night activities should remain restricted as these produce nuisance and noise and undermine mainstream retail. Riverside is an appropriate location for these activities. Consideration of the appropriateness of such activities to the Tombland and Prince of Wales areas should be given particularly given the historic setting and the fact that Prince of Wales Road operates as a visitor gateway to the city – and is currently presenting visitors with a rather hostile reception.

19 The plan should consider pursuing a relatively restrictive approach to housing in the city centre such that housing need/demand is balanced against the maintainance of land for economic and civic uses, given the accessible nature of the city centre.

Granular and specific housing need in the city centre should be interrogated and the plan should actively seek solutions to specific city centre housing need.

The plan should resist over-densification of sites by residential developers. Reference to former factory buildings on sites should not be treated as a precedent for new development to follow –

heights should be contextual to the historic city centre (3-4 storeys), except in exceptional circumstances. Central London (Maida Vale, Kensington), Edinburgh (tenemented Southside & Morningside), Glasgow (West End) was built on a ground plus 3 storey 'mansion block' format which can be shown to deliver between 70-90 dpu on a highly liveable, quality of life basis.

20 The provision of cultural facilities has been seen to successfully lead regeneration and development, and build the place proposition of a city.

The Deal Ground / Utilities / Britvic sites could potentially provide a beneficial waterfront location for a small-medium scale conference/concert facility.

A new contemporary gallery space potentially housing art collections which currently exist within the city, whether through an association with The Sainsbury Gallery at UEA, The Tate or V&A should be included within the Anglia Square redevelopment.

A museum/gallery focused on the city's history of fabric production and weaving should be considered.

The medieval heritage of the city should be more systematically promoted as a key visitor attraction. A UNESCO bid focused on the post-conquest (Norman) history of Norwich including the Castle, Cathedral, medieval churches and pilgrimage route to Walsingham could be considered.

A greater diversity of quality boutique hotels should be encouraged in line with other cities of similar scale and with similar tourism offers. Eg a gap analysis could be conducted against Cheltenham, Ghent

An additional high quality city secondary school should be considered, potentially tied in with the promotion of an educational offering emphasizing creative industry, cultural and tech skills. Notre Dame High School should be provided with more space to grow. Schools should be protected from the routing of traffic where possible – it is not sensible that traffic was routed away from All Saints Green in favour of increasing volumes of traffic in the vicinity of a school.

Securing a regular and uninterrupted Sunday train to London could boost tourism to the city and county.

21 I support Option UA1, however with the caveat that rail and light rail should be fully interrogated as movement options to alleviate congestion in the city centre and to encourage more sustainable movement.

22 Aylsham has already taken enough growth. It cannot take more growth without undermining the essential character and quality of the settlement and its setting.

As Diss is on a mainline station there is a stronger rationale for additional growth. This should be conducted on a strategic and well planned basis so as to produce a high quality town extension eg on a similar basis as at Poundbury.

The gap between Wymondham and Hethersett should be maintained. Careful consideration of additional growth at Wymondham should be undertaken via an enquiry by design process to consider optimal options to reinforce the character of place and a mixed use value proposition such that the settlement place quality and self sufficiency is maintained and amplified. The relationship of the station to the settlement should be considered. The feasibility of a rail or light rail connection between Wymondham and the UEA campus should be interrogated.

Long Stratton has potential to grow on a well-planned basis and to support the delivery of the required by-pass.

25. The settlement hierarchy is not a useful concept as it fails to take account of the fact that the facilities of a settlement can be radically changed and improved through development. It further loads development onto some of the most successful and attractive places, undermining their place offer.

It is critical in a county that relies on its attractiveness to tourism and to inward movement that high quality settlements are not spoilt through over-development.

On the basis of the earlier part of my submission proposing proactive intervention to unlock the development of major strategic land releases, development in villages should be highly constrained, allowable on the basis of demonstration of satisfaction of specific local housing demand / need; high quality approach; the delivery of key social infrastructure such as maintaining or creating a new primary school; and/or the maintenance of villages shops and facilities.

Residential development in association with existing business parks ie to create a balanced settlement should be considered, ie along with a village retail centre and amenity provisions.

Some hamlets or under-serviced villages could be improved via high quality urban design and land release to support additional facilities.

All of the above scenarios are site specific, and should be approach on a exception basis where specific rationale for growth can be demonstrated.

26 The Norwich policy area should include the entire county. This should also take account of the counter-veiling 'draw' of Cambridge housing market area.

There is a need for a much more granular and site specific approach to determining housing need and demand than the target setting approach pursued by the government. This could be informed by data technology which enables much more granular housing market analysis and tracking to take place.

30. New employment land should be included in all strategic site allocations which should be taken forward on a mixed use basis to support sustainable urban footprinting, trip reduction, place competitiveness and self sufficiency.

32. A new local high street and retail centre should be included at Broadland Gate as part of a mixed use sustainable urban extension and public transport oriented development.

A new local high street and self-contained local facilities should be considered at Thorpe Marriot to complete what is currently a dormitory settlement.

33. To boost the rural economy, the GNLP should secure full coverage of the rural areas to support mobile phone connectivity and high speed broadband.

The GNLP should interrogate the potential to improve the Bittern Line and Yarmouth Line rail services, and the reinstatement of lost rail routes such as The Marriot Way to underpin connectivity and accessibility of the city to the countryside on a sustainable basis, available to the young and old.

34/35 The improvement of strategic rail links connecting Norwich to Cambridge and onwards to Oxford would be a key priority.

The improvement of frequency of services on the Bittern Line should be an objective to underpin modal shift in association with parkway park and ride station facilities to encourage modal shift to reduce congestion into Norwich, however support flexible 'last mile' travel.

The feasibility of reinstatement of the Marriott way as a rail or light rail route should be interrogated

The feasibility of a light rail provision connecting the proposed Broadland Gate train station onward to the Airport and providing a sustainable , circular public transport route (potentially connecting onward to the Marriott Way and NNUH/UEA) should be interrogated.

The feasibility of a rail or light rail connection between Wymondham and UEA should be considered.

The feasibility of the completion of the Bittern Line onward to Holt and Fakenham should be considered.

I broadly support TRA1, provided the interrogation of rail options is taken into account and the limitations of BRT as an appropriate solution to public transport in Norwich / Norfolk is recognized.

36. I support option DE2 to encourage a stronger approach to design. I generally disagree with the principle of densification. Density should be contextually appropriate.

38. A flexible approach to affordable housing should be taken, underpinned by site specific housing market analysis to identify locationally specific demand and need.

39. A strict approach to windfall sites should be taken in line with option AH8, subject to comments made under 'settlement hierarchy'.

53 I support option NC2, which should be read in concert with my representation on the creation of a Norwich Greenbelt via a 'commons' approach.