

## Report for Resolution

**Report to** Council  
28 September 2010  
**Report of** Director of Regeneration and Development  
**Subject** Joint core strategy – Agreement to further changes

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### Purpose

To seek Council endorsement of certain changes being made to the previously submitted version of the Joint Core Strategy.

### Recommendations

- 1) To agree the changes proposed to the “Joint Core Strategy for Broadland, Norwich and South Norfolk: submission version (March 2010)” as summarised in the Supplementary Note dated 20<sup>th</sup> September to GNDP Policy Group;
- 2) To agree the minor amendment to the existing Local Plan proposals map as set out in Supplementary Note dated 20<sup>th</sup> September to GNDP Policy Group;
- 3) To agree that appendices, supporting evidence and background papers to the attached GNDP Policy Group paper should form the basis for progression to the public examination of the joint core strategy subject to the amendments set out in the Supplementary Note dated 20<sup>th</sup> September to GNDP Policy Group; and
- 4) To delegate authority to the Director of Regeneration and Development, in discussion with the relevant portfolio holder, to agree on behalf of the City Council the final form of any further technical statements and evidence to be submitted to the Public Examination together with the revisions to previously adopted local plan proposals maps and all necessary supporting documents to the Secretary of State under Regulation 30 of the Town and Country Planning (Local Development) Regulations 2004 (as amended).

### Financial Consequences

The financial consequences of this report are set out in section 5 of the accompanying report to the Greater Norwich Development Partnership (Appendix 1 herewith) which states: “Costs of preparing the JCS are shared by the three local planning authorities. This report has no additional direct financial implications beyond existing budgets. However, the Public Examination in autumn 2010 will have costs associated with the Inspector(s), support and accommodation”. The cost of producing this statutory plan needs

to be met each year and costs are expected to be within the provision made in the 2010/11 budget for anticipated costs.

### **Strategic Priority and Outcome/Service Priorities**

The report helps to meet the strategic priority “Strong and prosperous city – working to improve quality of life for residents, visitors and those who work in the city now and in the future” and the service plan priority “to complete the joint core strategy and start its implementation”.

### **Contact Officers**

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### **Background Documents**

**Please note:** Background documents supporting the JCS (including the extensive evidence base) are available from the Greater Norwich Development Partnership’s website [www.gndp.org.uk](http://www.gndp.org.uk) (follow the ‘document finder’ link). All background documents listed in the attached GNDP report are available via the GNDP website. <http://www.gndp.org.uk/downloads/Policy-Group-23-Sept-2010-with-links.pdf>

Copies of all representations received on the focussed are available for inspection on request. Please contact Graham Nelson to arrange this.

A briefing for all members on the progress on the Joint Core Strategy and the further work that has been conducted will be held In the Council Chamber at 4pm on 27<sup>th</sup> September. Note this session is open to all members of the GNDP authorities.

# Report

## Background

1. The Greater Norwich Development Partnership (GNDP) is managing the production of a Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk. The GNDP is an informal partnership comprising these three districts, together with Norfolk County Council and the Broads Authority.
2. When the JCS is adopted it will provide the main strategic planning policies for the city, market towns and villages across the area. It is part of the plan-making system: the local development framework, which is part of the council's policy framework and has an importance alongside the corporate plan and the sustainable community strategy. Once adopted, the strategy will set the overall spatial vision, objectives and high level policies to shape the future of the area. Its has to deliver significant growth of new homes and jobs, while addressing significant concentrations of deprivation especially in Norwich, enhancing the environment and quality of life residents currently enjoy and ensuring development and change is sustainable. For Norwich, it will supersede a small number of adopted local plan policies (such affordable housing) and make consequential changes to the proposals map.
3. Work started on the strategy started in 2007, and since then there have been wide-ranging consultations with the public and technical bodies. There have been ongoing discussions with key stakeholders, landowners, utilities, and service providers. The three local strategic partnerships and the county strategic partnership have a significant role to guide and direct this work, and there have been numerous briefings with them as the strategy has progressed. There have also been substantial informal Member briefings throughout the preparation of the strategy so Members have been kept informed, and to seek guidance on different approaches.
4. On 2<sup>nd</sup> March 2010 Norwich City Council resolved to agree that: 1) the 'Joint Core Strategy for Broadland, Norwich and South Norfolk: proposed submission document (November 2009)' as amended by the schedule of proposed minor changes is legally compliant and sound; and 2) submit those documents together with the revisions to previously adopted local plan proposals maps and all necessary supporting documents to the Secretary of State under Regulation 30 of the Town and Country Planning (Local Development) Regulations, 2004 (as amended).
5. In accordance with the above resolution the JCS was formally submitted on 5<sup>th</sup> March 2010. The then Secretary of State appointed Inspector Roy Foster MA MRTPI and Assistant Inspector Mike Fox BA (HONS) DIPTP MRTPI to conduct the examination to determine whether the Development Plan Document was sound.

6. On 13<sup>th</sup> May the Inspectors held an Exploratory Meeting on a number of issues. Subsequent to this meeting (on 24<sup>th</sup> May) JCS Inspectors published their conclusions following the Exploratory Meeting. Following consideration of these matters the GNDD produced a “Statement of Focussed Changes” to the submitted Joint Core Strategy. Executive Committee delegated authority on 30<sup>th</sup> June to the Director of Regeneration and Development, in consultation with the Portfolio Holder for Sustainable City Development, to agree the detail of these changes and for them to be published for consultation over the summer. The report noted that a report back to full Council on 28<sup>th</sup> September will be needed to summarise the responses to the consultation and consider whether the Council is prepared to recommend that these changes be made to the Inspectors.
7. The Focussed Changes were published for consultation from 19<sup>th</sup> July – 30<sup>th</sup> August. The changes published for consultation concerned three issues:
  - The provision of Gypsy and Traveller pitches to meet need arising after 2011 (Policy 4). This change resulted from revocation of the East of England Plan and the consequent lack of evidence at this time.
  - The approach to seeking a percentage of affordable housing on development sites (Policy 4) resulting from new evidence on viability issues. This change was to improve clarity and to include an overall numeric target for affordable homes based on existing evidence of need.
  - The reclassification of the Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle as a “strategic allocation” rather than a “strategic location”. This would mean that future work could be progressed through a Supplementary Planning Document (SPD) instead of an Area Action Plan (AAP). This was supported by a new concept statement to be included as an appendix to the Strategy.
8. The GNDD Policy Group report on the JCS (item 4 to the meeting on 23<sup>rd</sup> September) appended to this paper summarises the results of the consultation and further work undertaken since the exploratory meeting. It concludes that the two focussed changes proposed concerning Policy 4 should be taken forward and that the changes concerning the Growth Triangle should not be. Also a number of other mostly minor changes are proposed to the JCS to reflect updated circumstances and points of clarification. Finally an additional minor change is proposed to the Norwich Local Plan proposals map key for clarity.
9. The paper and the appendices to the policy group report make clear what changes are now considered appropriate to the JCS and considerable further supporting information is available in the supporting background papers. All this information is publically available via the GNDD website. An oral update will be provided to Council of any further information arising

from the Policy Group meeting on 23<sup>rd</sup> Sept.

10. For clarity a Supplementary Note dated 20<sup>th</sup> September has been prepared making explicit what changes are being proposed and making two minor amendments to the Policy Group paper. This supplementary note is attached to this paper as annex 1 and is referred to in the recommendations above.
11. The Public Examination is scheduled to commence on 9<sup>th</sup> November and last until 25<sup>th</sup> November. A list of matters and key questions for the Examination have been published by the Inspectors. It is likely that the Inspectors' report will be published early in 2011.

## **Joint Core Strategy : Next Steps**

### **Report by the GNDP Directors**

#### **Supplementary Note in relation to item 4**

##### **Clarification and Amendment to Policy Group Papers**

For clarity this note seeks to make explicit the changes to the Joint Core Strategy that are being recommended for members at the GNDP Policy Group meeting to recommend for constituent local planning authorities to subsequently agree.

The changes being recommended to the Joint Core Strategy are:

**(Please note: the page numbers used below refer to the page numbers used in the GNDP Policy Group paper)**

- 1) To endorse FC1 + 2 (see appendix 1a, pages 67– 68) relating to aspects of JCS policy 4 and supporting text (on affordable housing) as set out in the statement of Focussed Changes (July 2010) and to make no further change following consideration of representations received.
- 2) To endorse FC3 relating to paragraph 5.28 (see appendix 1a, page 69) of supporting text (on affordable housing) as set out in the statement of Focussed Changes (July 2010) but to make two amendments to proposed wording (set out in appendix 3 on pages 117 -118) following consideration of representations received.
- 3) To endorse FC4 - 7 (see appendix 1a, pages 70 – 72) relating to aspects of JCS policy 4 and supporting text (on Gypsies and Travellers) as set out in the statement of Focussed Changes (July 2010) and to make no further change following consideration of representations received.
- 4) Not to endorse FC8 – 10 (see appendix 1a, pages 73 - 89) relating to JCS policy 10 and appendix 5 (relating to the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle) and to withdraw two previously proposed minor changes (which were formally incorporated with the JCS submitted in March 2010) (see appendix 3 page 117) and endorse reverting to wording contained in the JCS proposed submission document November 2009). **Amendment** – please note amendment to the wording on (see appendix 3 page 117) for both changes should, for clarity, state **“Text to remain as in proposed submission draft JCS of November 2009”** rather than “Text to remain as in submitted JCS”.
- 5) To endorse the various changes to the JCS to address references to the Regional Spatial Strategy (as set out in appendix 3 pages 107-116).

- 6) To endorse the various changes to the JCS to address the Eco-Town (as set out in appendix 3 pages 107-116).
- 7) To endorse the various minor changes to the JCS as set in appendix 2 in response to issues raised by the Inspector in his note of 6<sup>th</sup> August. For the avoidance of doubt these are listed below:
- Proposed explanatory note as set out on page 103 of appendix 2 be added following policy 16 to explain changes to proposals maps in South Norfolk and Broadland.
  - Proposed explanatory note as set out on page 103 of appendix 2 be added following policy 15 to explain changes to proposals maps in South Norfolk.
  - Proposed explanatory note as set out on page 105 of appendix 2 be added following the first bullet point in policy 6 to clarify that the route of the Northern Distributor Road is shown on the Broadland proposals map.
  - Proposed two footnotes as set out on page 105 of appendix 2 be added to policy 10 to refer to forthcoming development plan documents in South Norfolk.
  - Proposed footnote as set out on page 105 of appendix 2 be added to Policy 9 to reflect forthcoming masterplans and development plan documents at UEA/NRP.

Please note that following its formal submission to the Secretary of State the local councils have lost the power to formally amend the JCS. The purpose of endorsing these amendments is basically to indicate to the Inspector that the local authorities favour these changes being made.

**Note for Norwich City Council only**

Additionally members of Norwich City Council are also being asked to agree a further minor amendment to the existing Norwich Local Plan City Centre Inset Map by adding the wording “LD – Large District Centre Retail Area (Local Plan Policies SHO3, SHO7 and SHO11)” to the key.

**Amendment** – page 104 of appendix 2 requires amendment as below:

The sentence starting “justification for these amendments ... “ should be deleted and the subsequent sentence should be amended to read “It is accepted that it is necessary to amend the key to the proposal map to explain these changes. The wording “LD – Large District Centre Retail Area (Local Plan Policies SHO3, SHO7 and SHO11)” should be added to the adopted Norwich City Centre Inset Map Key. No change is needed to notation relating to secondary shopping centres as this is already on the key.”

20 September 2010

## Joint Core Strategy : Next Steps

Report by the GNDP Directors

### Summary

This report outlines the result of the focussed changes consultation and updates members on progress towards the public examination in November. Submission of the focussed changes relating to affordable housing and gypsy and traveller provision is recommended. A schedule of further minor changes, largely to update the JCS, is also proposed.

### Recommendation

Members are recommended

- 1) to consider the appendices, background papers, and the results of the Focussed Change consultation,
- 2) to recommend the constituent local planning authorities agree:
  - a. to submit the proposed focused changes relating to affordable housing and gypsies and travellers (FC1-FC7) and the schedule of further minor changes
  - b. the appendices, supporting evidence and background papers should form the basis for progression to the public examination of the joint core strategy

To delegate to the GNDP directors, in discussion with portfolio holders, authority to agree the final form of statements relating to the matters raised by the inspectors or any other papers required for the examination, and recommend constituent authorities to do likewise

## 1. Background

- 1.1. This report updates members on progress made on the joint core strategy since the last Policy Group meeting on the 24 June 2010. At that meeting, members considered options for the way forward following revocation of the regional spatial strategies (RSS) and a work programme to answer questions raised by the inspectors in their note following the exploratory meeting in May. A considerable amount of progress has been made for each of the work-streams identified in the report. Background papers are being produced to cover each of the issues raised.
- 1.2. With regard to the way forward Members agreed to continue to progress the submission of the joint core strategy subject to a number of minor changes to take account of the revocation of the RSS. The inspectors subsequently asked for clarification about the local evidence supporting housing provision figures in the absence of RSS targets. A topic paper expanding on the evidence considered by Policy Group on the 24 June was produced and submitted to the Inspectors' to meet their deadline of 23 August. This is attached as a background document: EIP 70 Homes and Housing Topic Paper.
- 1.3. Members also agreed to recommend consultation on focused changes relating to affordable housing, gypsy and traveller provision and the identification of the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle as a strategic allocation



- 1.4. At the June meeting Members also discussed the assessment of 5 year land supply for housing. A revised methodology has been devised that is appropriate for local circumstances. This has been shared with CLG and the Minister's response will be reported orally.

## **2. Results of the consultation on focused changes**

- 2.1. The 'Statement of Focussed Changes' consultation covered proposed changes to affordable housing, gypsy and traveller provision, and the growth triangle status and concept statement. The attached report at Appendix 1 is a summary of the responses, with an officer commentary, and includes the Statement of Focussed Changes as published for comment. The full text containing all the representations is available in a separate report which Members are invited to examine and copies will be available at the meeting or upon request.
- 2.2. As a result of the consultation it is recommended that the focussed changes affecting affordable housing and gypsy and traveller provision are submitted, subject to a further minor change to clarify and correct supporting text (in FC3 para 5.28B – detailed in Appendix 3 to this report).
- 2.3. The proposed change of status of the Growth Triangle from a "location" to a "strategic allocation" is an issue of procedure rather than of principle. It was proposed in order to enable planning to be progressed by Supplementary Planning Document rather than an Area Action Plan (AAP). This course would minimise delay in developing a planning framework to co-ordinate development in the area and deal with expected applications. The consultation process has raised some issues including:
  - The Highway's Agency has expressed concern that it would be more difficult to ensure modal shift in the absence of an AAP, with consequent implications for assumptions around the Postwick junction improvement. Failure to achieve modal shift might also impact on the acceptability of planning applications for the later phases of development.
  - Representations on behalf of some landowners in the Growth Triangle reveal a lack of consensus around the concept statement. This lack of consensus suggests that an AAP will be required to resolve differing views and ensure co-ordination.
- 2.4. Broadland District Council's recent decision to align the production of site specific planning documents with a programme of community engagement would provide the opportunity to undertake the AAP route or another suitable process resulting from any changes to the planning system. In this context and in light of the issues raised by the consultation, it is recommended that Members do not submit the focussed changes relating to the status of the Growth Triangle and revert to the originally submitted JCS.

## **3. Work undertaken following the Exploratory meeting**

- 3.1. The principal areas of work required as a result of the Inspectors' exploratory meeting were:
  - **Infrastructure** – and the need to give some indication of the relative criticality to development of infrastructure identified in the JCS. Members approved a revised

appendix for the JCS at the June meeting subject to amendments to bring forward an element of community infrastructure to the period prior to 2016 and any further necessary updating of details.

- **Affordable Housing** –Drivers Jonas Deloitte were commissioned to carry out a formal study to look at the viability of the affordable housing targets in Policy 4. As a result of the study, a reworded policy was drafted to add clarity, and was subsequently published as one of the focused changes. The full report is referenced as a background document: EIP52 Affordable Housing Viability Study July 2010. Related points connected with the housing policy were also the subject of focused changes including overall affordable housing target, as requested by the inspector, and amended Gypsy and traveller targets to take account of the revocation of the RSS.
  - **The strategic allocation of the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle**, and the need to consult on the principal of making a strategic allocation supported by a concept statement. These changes were the subject of the focused change consultation.
  - **The distribution of development particularly in relation to its potential to be served by public transport and the justification for allocations at Long Stratton** this has included the development of a paper leading to a vision for Long Stratton to be completed through site-specific allocations work and an audit trail showing the process of decision-making which led to the favoured option and potential for BRT. The draft paper will be available for Members for information.
  - **The Northern Distributor Road** - its relationship to public transport improvements, prospects for delivery including potential thresholds in the northeast, modal shift targets and the implications of a delay in achieving the NDR. A paper to answer this issue has been drafted and will be available for Members for information.
  - **Sustainability issues** around green infrastructure, water and energy policies including realism and means of delivery. A paper to answer this issue has been drafted and will be available for Members for information.
- 3.2. The draft Local Investment Plan and Programme (LIPP - formerly the Integrated Development Programme) will be available to Members for information and will be shared with the Inspectors at the Hearing. The LIPP is a working draft document that will be made available to the Inspectors to assist in their consideration of the Joint Core Strategy. It will be subjected to further negotiations with the Homes and Communities Agency over the Autumn and subject to a separate sign-off process. Following this it will be a 'live' document, subject to regular review.
- 3.3. Subsequent to the exploratory meeting the Inspectors' raised additional questions about the intended changes to the adopted proposals maps. A statement clarifying this is included as Appendix 2. Minor changes to the JCS are proposed to provide explanatory footnotes. The JCS could also be tidied up and brought up to date by removing unnecessary references to the RSS and the eco-towns programme. None of these changes have any impact on policies. If it is agreed not to pursue the

changed status of the growth triangle the originally submitted minor change altering the word "location" to "allocation" would also not be pursued. A schedule of proposed "further minor changes" to the text of the JCS to take account of all these issues is included as Appendix 3.

- 3.4. For procedural purposes, updates to the sustainability appraisal (Background paper EIP 53) and self assessment statement will be submitted to the Inspectors as supporting evidence

#### 4. **Next Steps : Examination in Public**

- 4.1. The Programme Officer has issued the Inspectors' list of matters and key questions for examination to all interested parties, which will form the focus for the Examination due to start on the 9th November. For each of the matters, the GNDP/ local planning authorities (and other participants at the examination) are invited to submit a statement of up to 3000 words. The matters to be discussed largely cover the same issues as raised following the exploratory meeting.
- 4.2. The guidance note 'Invitation and guidance to respondents on the submission of statements for the forthcoming hearing sessions' sets the process in detail and how to raise the points. Background paper EIP 71 Invitation to EIP Preliminary Prog and Matters 20 August 2010

#### 5. **Resource Implications**

Costs of preparing the JCS are shared by the three local planning authorities. This report has no additional direct financial implications beyond existing budgets. However, the Public Examination in autumn 2010 will have costs associated with the Inspector(s), support and accommodation.

#### 6. **Other Implications**

**Legal Implications :** Primary legislation requires local planning authorities to prepare a Local Development Framework.

**Equality Impact Assessment (EqIA) :** The submitted JCS has been subject to an EqIA.

**Communications :** In accordance with normal practice, a press release will be issued after this meeting

**Any other implications :** Officers have considered all the implications which members should be aware of. Apart from those listed in the report (above), there are no other implications to take into account.

#### 7. **Section 17 – Crime and Disorder Act**

No implications.

#### 8. **Risk Implications/Assessment**

All options carry risks. The recommendation minimises these.

#### 9. **Alternative Options**

Members could recommend that a different combination of the proposed focussed changes is submitted. This would increase the risk of unsoundness or imposed changes. Options involving further delay increase the risks of additional costs; unplanned and less sustainable development; and failing to meet housing need, facilitate economic growth or attract infrastructure investment.

## 10. **Conclusion**

Significant progress has been made to prepare for the examination in November. Some further minor changes to the JCS are appropriate, in particular to take account of the altered national context. The proposed focussed changes relating to affordable housing and gypsy and traveller provision should be submitted. The revised local timetable for the development of detailed planning documents coupled with consultation responses suggests that it is no longer appropriate to change the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle from a location to a strategic allocation.

## **Recommendation / Action Required**

Members are recommended

- 1) to consider the appendices, background papers, and the results of the Focussed Change consultation,
- 2) to recommend the constituent local planning authorities agree:
  - c. to submit the proposed focused changes FC1-FC7, relating to affordable housing and gypsies and travellers (as shown in appendix 1) and the schedule of further minor changes (appendix 3)
  - d. the appendices, supporting evidence and background papers should form the basis for progression to the public examination of the joint core strategy
- 3) To delegate to the GNDP directors, in discussion with portfolio holders, authority to agree the final form of statements relating to the matters raised by the inspectors or any other papers required for the examination, and recommend constituent authorities to do likewise

## Appendices

1. Appendix 1 – Report of consultation on Statement of Focussed Changes, including the Statement of Focussed Changes document published for comment.
2. Appendix 2 – Statement on changes to the proposals maps
3. Appendix 3 – Schedule of Further Minor Changes to text

## Background Papers

1. EIP 70 Homes and Housing Topic Paper
2. EIP 74 Full text of all representations received in response to the Statement of focused changes, available as a separate report
3. EIP 72 Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England
4. EIP 52 Affordable Housing Viability Study July 2010
5. Assessment of the development capacity of the Old Catton, Sprowston, Rackheath, Thorpe St Andrew Triangle.
6. The distribution of growth, particularly in relation to its potential to be served by public transport and the justification of allocations at Long Stratton.
7. Norwich Area Transport Strategy Implementation plan
8. Sustainability Issues
9. Local Investment Plan and Programme v1
10. EIP 53 Sustainability Appraisal Update July 2010
11. Updated soundness self assessment
12. EIP 67 Update to the Inspectors 6 August 2010
13. EIP 71 Invitation to EIP, Preliminary Programme and Matters 20 August 2010.

## Officer Contact

If you have any questions about matters contained in this paper please get in touch with:

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## Joint Core Strategy for Broadland, Norwich and South Norfolk

### Report of Consultation on Statement of Focussed Changes, August 2010

#### 1. Introduction

- 1.1 Following an exploratory meeting in May 2010, Inspectors appointed to hold a public examination into the Joint Core Strategy for Broadland, Norwich and South Norfolk raised a number of issues. Some of these led to proposals to amend the JCS in a way which necessitated a period of public consultation.

#### 2. Publication

- 2.1 A Statement of Focussed Changes was published and made available for comment from 19 July to 30 August 2010. Because 30 August fell on a Bank Holiday, an additional day, 31 August, was allowed for the receipt of representations.
- 2.2 The consultation was publicised via the local press, through Council Information Centres (including the Mobile Information Service) and by contacting individuals and stakeholders who had made representations at the pre-submission stage, and all Town and Parish Councils.
- 2.3 Advertisements giving notice of the forthcoming consultation went into the following local papers in July

EDP	2 July
Norwich Evening News	2 July
Great Yarmouth Mercury	9 July
Beccles Bungay Mercury	9 July
North Norfolk News	9 July
Norwich Advertiser	9 July
Wymondham Mercury	9 July
Diss mercury	9 July

Additional adverts were placed in all 8 local papers listed above in the week commencing 19 July and again in the week commencing 9 August.

#### 3. Outcome

- 3.1 A separate comprehensive report itemising all representations received is available. This report attempts to summarise the main points made in relation to each of the focussed changes.

## Appendix 1

- 3.2 Although response forms were provided, many representations took the form of letters, without necessarily specifying a particular focussed change to which they relate, or specifying any specific remedy to overcome any perceived unsoundness.
- 3.3 It should be noted that, as a consequence, many of the comments made in relation to Policy 10, (Locations for major new, or expanded, communities in the Norwich Policy Area) were assigned to both the focussed changes relating to this policy (FC8 and FC9), and also to the focussed change to the appendix which elaborates the policy (FC10), unless the representations were very specifically directed towards one or other of the focussed changes. For this reason, the total number of submissions received is less than the sum of the representations attributed to each focussed change.
- 3.4 A second consequence of this arises because the database on which the original representations are stored requires entry of data in a field entitled "change to plan". In the case of many submissions by letter which did not suggest a specific change to the strategy, this field has had to be populated either by repetition of the body of the representation, or a statement that the text in the submission plan should be retained. Please note that in many instances, particularly in relation to the growth triangle, objectors are opposed to the principle of development, and the entry on the database should not be taken as an expression of support for the principle of development.

### 4. Summary of the responses to each Focussed Change

In the summary that follows, the main points made in respect of each focussed change are listed in a table alongside an officer response where appropriate. The full Statement of Focussed Changes document, as published for comment, is appended to the end of this report as Appendix 1a

#### 4.1 FC1 Affordable Housing Policy (Policy 4)

(Pages 1-2 in Statement of Focussed Changes document)

Representations received	
Total	22
Compliant	
Not compliant	5
Sound	2
Unsound	20

Main Issues raised	Officer response
No housing will be affordable given the	It remains Government policy to seek

## Appendix 1

Main Issues raised	Officer response
current economic climate and "sustainability" target set by the government and E. U. The country cannot cater for population growth as currently envisaged.	to secure a proportion of affordable housing on larger market housing sites
On the GNDP's own evidence, the 40% target is unattainable on the majority of sites without subsidy. Even this is based on a piece of evidence which itself uses unreliable assumptions, and disregards the JCS policy aspirations to achieve code 6 of the Code for Sustainable Homes by 2015. The additional flexibility offered in the rewording of the policy is not sufficient to compensate for this.	<p>Drivers Jonas Deloitte will be invited to defend their methodology</p> <p>While the study suggests that under a baseline (economically difficult) scenario, 30% of sites would be viable, 60% unviable, and 10% marginal, given the scale of affordable housing need, a policy which opts to forgo the potential contributions of 30% of sites is not considered appropriate, particularly when the policy explicitly includes flexibility to negotiate where viability is an issue. Furthermore, the study itself notes that where the majority of sites are likely to be greenfield, its viability conclusions may err on the side of pessimism. In the JCS situation this is likely to be a factor.</p>
Oppose the variable thresholds. Believe growth locations should deliver the same proportion as other sites (and challenge the basis of the viability study)	Drivers Jonas Deloitte will be invited to defend their methodology
Criticism of the wording of the policy particularly the "rounding up" of the number of affordable houses where the percentage requirement would be 0.5, (objector argues 0.5 is less than half) and suggestion that the policy should state that "the number sought, <u>within</u> each district, may be reduced....."	The suggested changes to policy wording are not considered necessary or helpful
Policy will reduce the opportunity for people to live on developments without a high proportion of affordable houses – this is discriminatory	It remains Government policy to seek to secure a proportion of affordable housing on larger market housing sites
Considerations of developer viability incentivise greenfield development	Drivers Jonas Deloitte will be invited to defend their methodology
Public subsidy should not be used to support affordable housing and therefore justify unviable development	It remains Government policy to seek to secure a proportion of affordable housing on larger market housing sites. In some instances public subsidy may be necessary to ensure



## Appendix 1

Main Issues raised	Officer response
	all sections of the community are adequately housed. Failure to do so could result in significant social problems.
Bilateral negotiation between developer and local planning authority over the quantity of affordable housing is an undesirable situation	It remains Government policy to seek to secure a proportion of affordable housing on larger market housing sites
Criticisms of the policy's evidence base in the form of the Drivers Jonas Deloitte report – see comments on that report	Drivers Jonas Deloitte will be invited to defend their methodology
Given that the study suggests that at baseline values, only 30% of scenarios would be viable with 40% affordable housing, policy target should have been set lower such that a majority of sites would be viable at the target rate.	While the study suggests that under a baseline (economically difficult) scenario, 30% of sites would be viable, 60% unviable, and 10% marginal, given the scale of affordable housing need, a policy which opts to forgo the potential contributions of 30% of sites is not considered appropriate, particularly when the policy explicitly includes flexibility to negotiate where viability is an issue. Furthermore, the study itself notes that where the majority of sites are likely to be greenfield, its viability conclusions may err on the side of pessimism. In the JCS situation this is likely to be a factor.
Accept that smaller developments may not be able to deliver 40%, but they should be compensated by higher target on large sites	40% has traditionally been viewed as the practical limit of what can be achieved without subsidy. The Drivers Jonas Deloitte evidence shows that achieving this level will be difficult on many sites.
New developments should include a wide range of tenures including co-housing	Noted but the policy does not preclude this
Provision of affordable housing in rural or semi urban areas is necessary but also dependent on locally accessible infrastructure	Agreed
No clear evidence supporting the graduated contribution from smaller sites. Evidence elsewhere suggests this is not a factor.	Drivers Jonas Deloitte will be invited to defend their methodology
Not legally compliant because of inadequacies in consultation process and relationship to policies of the previous Government, and potential for	Members decided in June that locally available evidence broadly supports the scale development proposed, notwithstanding the scrapping of the

## Appendix 1

Main Issues raised	Officer response
further consideration by Members means that the final form of any submission to the inspector cannot therefore be judged by consultees	RSS. This will be a matter for consideration at the examination in any event.
Government changes to planning system mean the strategy is no longer compliant with national policy	Members decided in June that locally available evidence broadly supports the scale development proposed, notwithstanding the scrapping of the RSS
Not justified because of inadequate consultation, and not effective because of uncertainty over infrastructure	The consultation on focussed changes exceeded the advice given by the Planning Inspectorate and the Government Office for the East of England. The examination will consider whether an acceptable level of certainty exists over infrastructure provision
Overall housing numbers still driven by now rescinded RSS.	Members decided in June that locally available evidence broadly supports the scale development proposed, notwithstanding the scrapping of the RSS
Unlikely to be public subsidy for affordable housing as referred to in policy FC1	The policy is not dependent on public subsidy, but states that where viability is at risk, the availability of public finance will be one of the factors taken into account alongside others such as reducing the proportion of affordable houses sought
Evidence report inadequate in its assessment of sensitivity to differing economic circumstances, and site specific issues, including local land values, and the higher standards required of eco community proposals in terms of infrastructure etc	<p>Drivers Jonas Deloitte will be invited to defend their methodology</p> <p>While the study suggests that under a baseline (economically difficult) scenario, 30% of sites would be viable, 60% unviable, and 10% marginal, given the scale of affordable housing need, a policy which opts to forgo the potential contributions of 30% of sites is not considered appropriate, particularly when the policy explicitly includes flexibility to negotiate where viability is an issue. Furthermore, the study itself notes that where the majority of sites are</p>

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Main Issues raised	Officer response
	likely to be greenfield, its viability conclusions may err on the side of pessimism. In the JCS situation this is likely to be a factor.  The proposed policy wording is more flexible to emphasise that site specific viability issues will be taken into account in terms of the proportion of affordable housing sought, and tenure split
Imposition of CIL on market houses only is unreasonable	The discussion on CIL reflects the current regulations, though it is accepted that the new Government may wish to revisit these
Challenge applicability of viability study models to scenarios where a longer-term more complex business model may be used / necessary	Drivers Jonas Deloitte will be invited to defend their methodology

### 4.2 FC 2 Affordable Housing supporting text

(Page 2 in Statement of Focussed Changes document)

Representations received	
Total	15
Compliant	
Not compliant	5
Sound	
Unsound	14

Many of the points raised echo those made in relation to FC 1. Additional specific points made in relation to this paragraph include the following:

Main Issues raised	Officer response
Target should not drop below 40%. If developers do not wish to fund 40% affordable homes they should not be allowed to build	While there is a need for affordable homes, and an ambitious target is justified, it is also important to remember there is a need for market homes as well
Comment on the limited value of housing needs assessments which form the basis for the target	The housing needs evidence followed government guidelines on the methodology prevailing at the time
Viability considerations are likely to	There is a limited land supply and

## Appendix 1

Main Issues raised	Officer response
<p>increase pressure for higher density. The assumptions in the report suggest this would increase pressure in Broadland. Notes housing pressure in Norwich combined with limited land supply – this will increase pressures in other districts</p>	<p>Norwich and this has been taken into account in assessing the scale of allocations across the strategy area. Density requirements in Norwich are not necessarily below those in other districts and in many instances are higher</p>
<p>The paragraph should not indicate that evidence shows a "significant" proportion of sites will be able to deliver the target. The assumptions made in the Drivers Jonas Deloitte report should be added to the JCS as an appendix for transparency and to assist future negotiations</p>	<p>The evidence base has been published, but it does not fetter discussions about the viability of a particular site. The evidence shows that in 30% of scenarios modeled, a site would be viable. While this is not a majority, it is still viewed as a significant proportion. Given the scale of affordable housing need, a policy which opts to forgo the potential contributions of 30% of sites is not considered appropriate, particularly when the policy explicitly includes flexibility to negotiate where viability is an issue. Furthermore, the study itself notes that where the majority of sites are likely to be greenfield, its viability conclusions may err on the side of pessimism. In the JCS situation this is likely to be a factor.</p>
<p>Not clear how the environmental standard of homes will be taken into account in assessing viability as stated in the paragraph. The study does not address adequately the impact of code level 6 on viability</p>	<p>The cost of building to any given code level currently in force, either as a consequence of national policy or JCS policy will be a factor in the assessment of viability. Where the environmental standard results from the application of JCS policy, there will be a judgment to be made between the policy aspirations for delivery of affordable homes and delivery of a low carbon environment. That judgment can only be made according to the circumstances at the particular time.</p>
<p>Doubts about viability mean the comprehensive spending review should be awaited and its outcome digested before the JCS proceeds</p>	<p>There is no obvious benefit to a delay on the basis of the comprehensive spending review. There will always be areas of uncertainty which planning has to recognise.</p>
<p>Oppose the use of public subsidy to build affordable homes – more</p>	<p>Suitable and affordable accommodation is seen as basic</p>

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Main issues raised	Officer response
appropriate to use it to enhance local infrastructure	human need and remains a high priority of the planning system.

### 4.3 FC 3 Affordable Housing supporting text, including overall plan wide affordable housing requirement (Pages 3 – 4 in Statement of Focussed Changes document)

Representations received	
Total	15
Compliant	
Not compliant	4
Sound	1
Unsound	14

Again, many representations reflect those made in response to FC 1 and FC 2. Specific points made include the following:

Main issues raised	Officer response
In terms of tenure, since strategic sites will be delivered over a long period, the short term requirement for 85% social-rented housing should not be imposed, and a proportion nearer to the 60% likely to be needed in the longer term should be applied	The existing backlog represents the current situation and needs to be tackled in the short term. It is the current backlog which is very heavily biased towards the need for social-rented rather than intermediate tenures
The threshold should be based on the national indicative threshold of 15 dwellings and not reduced to 5 in order that smaller sites can offer a more varied form of development	The scale of housing need, particularly in and near to Norwich, means that contributions will need to be sought from relatively small sites
There is a lack of transparency in the allocation mechanisms for affordable housing	A matter for housing rather than planning policy
Plan wide assessment of affordable housing should have policy status	Do not see this would add value. While instrumental in setting the policy framework, its value is more in helping to monitor the effectiveness of policies
Most recent housing assessments dates from 2006, which means they are approaching the end of their life, and were prepared before more recent updates in the recommended methodology.	It is recognised that the "shelf life" of the housing needs/market evidence base is limited. Such studies typically have a life of five years. This means the 2006 study remains valid, though towards the end of its life. The GNHP is proposing to commission an update of the evidence base likely to report in

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Main Issues raised	Officer response
	2011 and develop it into a strategic housing market assessment which will ensure continued relevance. A statistical update produced in 2009/10 using new information on rents, house prices, incomes etc, and involving dialogue with key players in the housing market including agents, private landlords etc broadly confirms the earlier conclusions
The reference to a policy target of 40% is at odds with the policy where graduated approach for smaller sites is incorporated	<b>Noted this is correct and the specific reference to 40% should be removed from the supporting text</b>
Dispute the assertion that 40% is achievable in normal market conditions – argue this is only achievable in very good market conditions. Examples should be provided of where this has been achieved.	Until 2009, only Broadland had a target of 40%. Some examples from Broadland can be provided. The text does state that 40% is the “maximum” which can be achieved in normal market conditions.
The list of factors meaning target may not be reached should be extended to include factors such as necessary infrastructure provision and the lack of availability of public subsidy	It is not considered necessary. The potential for public subsidy may be a remedy. Infrastructure provision is a normal part of the development costs of a site
Target should be differentiated between different parts of the area	The evidence study does not support this conclusion
Disagree with the definition of affordable housing – the phrase “people in housing need” is too restrictive	The definition of affordable housing does reflect government guidance in PPS 3
Do not accept that short term target should differ from the long-term affordable housing need based on the government's basic needs assessment model assuming the backlog in affordable housing need is eradicated over a five year period.	The evidence base for the housing market assessment did assume the affordable housing backlog would be eradicated over the next five years. Although that is not a specific requirement of Government guidance published in 2007, the advice on p52 is “the quota should be based upon meeting need over a period of five years, although longer timescales can be used.” However, there is no reference in that guidance to the basic needs assessment model. <b>In light of this, the second sentence of the</b>

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Main Issues raised	Officer response
	<p>paragraph of 5.28 should be reworded to replace “the expectation of the Government’s basic needs assessment model.....” with “the expectation within government guidance .....”</p> <p>Negotiations on strategic sites would be expected to take into account the most up to date information available. If evidence in the future demonstrates that the initial obligation under section 106 relating to affordable housing is no longer relevant, it would be possible for the obligation to be renegotiated, or if the local planning authority refused, after five years challenged.</p>
One representation offers a different calculation of the likely long term affordable housing need	Noted, but not considered any more valid than that in the focussed change
FC. 3 does not adequately reflect the reworded policy’s commitment to take full account of viability issues	Supporting text in FC 2 should be read in conjunction with this paragraph. FC 2 is explicit about the need to take viability issues as well as housing needs assessments into account
Oppose the consequence of the strategy that need arising in one area will be met in another.	Housing markets do not respect political boundaries, and this applies just as much to the private housing market as to intermediate tenures and social-rented housing pressures

N. B.

The response to two of the representations suggests slight changes of wording to FC 3 paragraph 5.28B. **These have been shown in bold text in the table above**

### 4.4 FC 4 Affordable Housing supporting text, including expected contribution from “exceptions sites”

(Page 4 in Statement of Focussed Changes document)

Representations received	
Total	3
Compliant	
Not compliant	3
Sound	
Unsound	3

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Main Issues raised	Officer response
The forecast contribution from exceptions sites is noted. Whilst these can not be taken into account as part of housing provision, once completed they should be recorded and counted as part of the affordable housing delivery for monitoring purposes	Agreed – they are counted in this way

### 4.5 FC 5 Gypsies and Travellers Policy (Policy 4) (Pages 4 – 5 in Statement of Focussed Changes document)

Representations received	
Total	8
Compliant	
Not compliant	3
Sound	
Unsound	8

Main Issues raised	Officer response
The evidence base which gave rise to the RSS targets is still extant and should be taken into account. This includes assessing future growth on the basis of a compound 3% per annum rate. Do not understand why the longer-term target based on this growth has been rejected. If the policy is to change the policy and accompanying text should state how and when such updating will be carried out and indicate how provision will be made post 2011. This should include transit sites	The authorities generally accepted the scale of growth proposed by the RSS until 2011. This was in spite of the fact that the evidence base behind the RSS produced two scenarios. The first of these was based "purely" on evidence and the second involved some redistribution to avoid the peaks and troughs in requirement which would have followed the "pure" approach. In the second approach, the one which gave rise to the RSS targets, the targets for Norwich and Broadland both exceeded the "pure" evidence based target. Both councils accepted a degree of redistribution in this way as a matter of equity and to assist delivery, but neither saw this as a justified approach for extrapolating long term targets and both responded to this effect at the point where the Secretary of state consulted on the draft RSS alteration. It may well be therefore that revised targets are lower, but it would be wrong for the strategy to make this assumption without having done the necessary local research.



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Main Issues raised	Officer response
There is no indication the number of permanent residential sites will be substantially different from the previous version. If it is to be fewer the policy should say so	It may well be that revised targets are lower, but it would be wrong for the strategy to make this assumption without having done the necessary local research.
A simple commitment to update based on new evidence lacks clarity	In response to criticisms of other focussed changes, the point has been made that the GNHP is preparing to refresh housing requirements evidence and expand it into an updated housing market assessment. In parallel with this the GNHP is proposing to undertake or commission local research to assess future requirements for Gypsies and travellers. This should ensure a timely update of the evidence base.
Concern about the suggestion that after 2011 pitches will be provided in association with large-scale housing growth	The focussed change states some of the allowance to be provided after 2011 is expected to be provided in association with large scale strategic housing growth. With regard to residential pitches, the same broad locations would be appropriate in terms of the availability of social infrastructure such as schools, health care facilities etc and similar environmental considerations leading to the choice of development locations would appear to apply to housing and other forms of residential provision.
Strategy fails to pay adequate regard to the management implications of site provision	Do not accept that such details are appropriate for a core strategy. They would be more appropriate in site allocations or development management development plan documents
Concern that mobile home provision is only considered in relation to Gypsies and travellers. Representation promotes mobile homes as low impact homes which have the ability to be moved should locational criteria change.	The policy requirement is specifically directed to Gypsies and travellers. If part of the provision for the settled community were to be met through the provision of mobile homes, it would be considered through the normal planning process.

**4.6 FC 6 Gypsies and Travellers supporting text**  
(Page 6 in Statement of Focussed Changes document)

Representations received	
Total	2
Compliant	
Not compliant	2
Sound	
Unsound	2

Main Issues raised	Officer response
No issues specified	No response

**4.7 FC 7 Travelling Show people supporting text**  
(Page 6 in Statement of Focussed Changes document)

Representations received	
Total	3
Compliant	
Not compliant	2
Sound	
Unsound	3

Main Issues raised	Officer response
The evidence base which gave rise to the RSS targets is still extant and should be taken into account. This includes assessing future growth on the basis of a compound 3% per annum rate. Do not understand why the longer-term target based on this growth has been rejected. If the policy is to change the policy and accompanying text should state how and when such updating will be carried out and indicate how provision will be made post 2011. This should include transit sites	The authorities generally accepted the scale of growth proposed by the RSS until 2011. This was in spite of the fact that the evidence base behind the RSS produced two scenarios. The first of these was based "purely" on evidence and the second involved some redistribution to avoid the peaks and troughs in requirement which would have followed the "pure" approach. In the second approach, the one which gave rise to the RSS targets, the targets for Norwich and Broadland both exceeded the "pure" evidence based target. Both councils accepted a degree of redistribution in this way as a matter of equity and to assist delivery, but neither saw this as a justified approach for extrapolating long term targets and both responded to this effect at the point where the Secretary of state consulted on the draft RSS alteration.

#### 4.8 FC8 Locations for major new or expanded communities in the Norwich Policy Area (Policy 10)

(Page 7 in Statement of Focussed Changes document)

Representations received	
Total	167
Compliant	
Not compliant	11
Sound	6
Unsound	161

Please note – many of the representations relating to FC8 took the form of letters with a standard wording. Many copies were received of two such letters with slight variations in wording, but making similar points. These put forward a number of specific objections as detailed in the first row of the table below.

Main Issues raised	Officer response
<p>The change in status from a broad location of growth to a "strategic allocation" has been introduced at a late stage without adequate time for proper consideration of a detailed concept statement. There have been no public exhibitions or meetings on the proposals to enable people to find out more.</p> <p>Re- designation as a "strategic allocation" is intended to speed up the planning process and avoid the requirement for a public examination</p> <p>Concerned about direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on maps in the concept statement. Not convinced the unconstrained land can accommodate the proposed number of dwellings, and therefore some land identified as having environmental constraints would be sacrificed a development. or require the reduction in number of dwellings.</p> <p>Object in principle to the proposed development of up to 10,000 dwellings based around NNDR – loss of</p>	<p>The primary motivation for seeking to progress the growth triangle as a strategic allocation is to speed up preparation of a planning framework to guide new development. This is prompted by the lack of a current five year supply of housing land and the consequent risk of the Council being forced to consider planning applications on an ad hoc basis. It is true that such a process would not require an independent public examination of the kind which would be required for an area action plan, but it would not negate the need for public engagement. The Council must consider whether this approach is consistent with the Government's localism agenda. In terms of the capacity of the triangle, in particular the unconstrained land, to accommodate the scale of development proposed, a high level assessment has been undertaken. This suggests that it would be possible to accommodate the scale of development proposed on unconstrained land, though it should be acknowledged that that is unlikely to produce the best layout, and a</p>

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Main Issues raised	Officer response
countryside and traffic consequences	<p>more sustainable urban form would be likely to result from some development being accommodated on land which has been highlighted as constrained in some way. In this respect, it is fair to point out that not all constraints of equal significance. At one extreme, it is clearly impossible to relocate Ancient Woodland, while on the other it is relatively easy to relocate green space currently used as playing fields. Historic parkland should be protected, but may be able to offer the potential for extremely attractive informal recreation space to serve the growing communities and secure its future management. Similarly, while development should not be allowed to compromise the biodiversity value of County Wildlife Sites, detailed investigation may indicate some parts are less sensitive and could accommodate development. Landscape value is a local designation, rather than a national one, and some parts may be "tradeable" in the context of well designed development. The high level assessment of development potential in the growth triangle is presented as a background paper.</p>
<p>The argument that it is necessary to speed up plan making process is at odds with the District Council's Cabinet's conclusion in June that the Council should take a step back and take stock until such time as the direction the new government proposed to take became clear. Given the District Council's decision to delay consultation on site-specific work, the proposed changes to FC8 are unjustified</p>	<p>The decision to rescind the RSS was a consideration in Broadland's decision not to progress consultations on site specific allocations, because it was necessary for the JCS to give certainty over the future scale of development. However once the certainty is restored it will be necessary for a more detailed framework to be put in place quickly. Members need to consider if there is a stronger argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind and whether this should follow the AAP route (or any replacement process introduced by the new Government) so that more</p>

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Main Issues raised	Officer response
	formalised examination will be undertaken.
The proposed change unjustifiably changes the status of the entire triangle from one where development might be possible in principle in some locations and instead creates a single blanket site allocation without adequate protection for areas of environmental importance. It does not first establish whether such growth is deliverable or represents the most appropriate strategy for development taking into account there is no "plan B." In effect therefore, it puts delivery ahead of other key objectives of the core strategy, and, because it would establish the principle of development across the entire area, the area is more likely to be subject to piecemeal development.	Coordination of infrastructure, including transport infrastructure was one of the reasons why the AAP approach was initially favoured. Given the likelihood of urgent development pressures in relation to housing land supply, a strategic allocation and SPD approach which could be put in place relatively quickly was seen as a pragmatic approach to achieving such coordination.
Oppose growth to the north east – transport and employment are better in the south	The overall scale of development, principle of an urban extension in the north east, role and deliverability of the NDR, are fundamental to the JCS and will be considered at the examination
NDR funding and delivery not guaranteed	Deliverability of the NDR is fundamental to the JCS and will be considered at the examination
A number of letters made specific points objecting to the inadequacy of consultation, particularly during the holiday period. Many make points about the inadequacy of the form provided for responses. SPD status would enable the Council to make changes to future plans without further public consultation. This is contrary to the new Government's emphasis on localism.	The timetable of consultation response to that set by the inspector for the public examination of the Joint Core Strategy. A longer period of consultation was not practical in that context within the current JCS process.
Changes to the plan making system made/proposed by the Government should give an opportunity for complete reappraisal.	The only significant change made by the new Government in plan making has been a decision to rescind the RSS. Members have already taken the decision to carry on preparation for the examination on the basis of

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Main Issues raised	Officer response
	other sources of evidence on future housing requirements
The proposal indicates inadequate emphasis is being placed on the environmental protection, particular reference to the risk to mature trees	The concept statement commits the council to undertaking an appropriate assessment under the Habitats Regulations. The regulations themselves would prevent development proposals which would have an adverse impact on Natura 2000 sites without adequate mitigation
Some respondents appear to refer specifically to the recent "charette" held by landowners concerning Racecourse/Belmore/ Browns plantations. While the representations may have been prompted by a specific event organised by the landowner, rather than the focussed changes document, they have been included since they clearly express concerns about the way future development within the growth triangle will be handled.	As the charette was not part of the focussed changes, this is a matter for note.
Area covered by the policy has been extended	The area covered is the same as that shown on appendix 5 of the submitted JCS
Respect for environmental designations would leave the Rackheath proposal as free standing and isolated from the remainder of the urban extension as well as by the NDR. This will not be "permeable" even if attractive routes can be made possible in daylight hours – they will not be attractive after dark from the security angle.	There is no reason why a coordinated development should not include areas of open space. The urban form could be enhanced by appropriate corridors providing ecological connectivity

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Main Issues raised	Officer response
There is no evidence that the NDR represents the best transport strategy for this area. Strategic allocation status would avoid the need for an independent examination, contrary to paragraph 6.1 of PPS 12	The role of the NDR will be considered in the examination
Rackheath would be largely served by Wroxham Road and Salhouse Road. Object to the additional traffic passing across Mousehold Heath	Transport proposals including the potential for a BRT route crossing Mousehold Heath will be considered at the examination. It is quite possible that measures to create bus priority on this route could reduce existing traffic flows
The growth triangle should be retained as an area action plan in view of the conclusions of the February, 2010 appropriate assessment regarding potential cumulative and in combination effects of the JCS on water resources, water efficiency, growth and tourism. The efficacy of mitigation measures can only be established through examination of detailed proposals. If the proposals cannot demonstrate effective mitigation of impacts the development will not be able to go ahead. The complexity of the unresolved issues go beyond the scope of a SPD. Therefore the approach is unsound.	It is in recognition of the complexity of environmental issues that the concept statement includes a commitment to Sustainability Appraisal and an Appropriate Assessment under the Habitats Regulations even though these would not automatically be necessary for an SPD
Given the need to secure the highest standards in terms of the water environment, currently supported in the case of Rackheath by the Eco towns supplement to PPS 1, there is concern that if the new Government were to rescind that policy statement, the SPD would give less opportunity than an AAP to introduce sufficiently stringent policy requirements to ensure development meets the standards currently proposed.	The default position would be that set out in the JCS policy covering energy and water efficiency
Concerned that the SPD will not offer the same certainty of a coordinated approach to transport infrastructure	This view has been expressed by the Highways Agency. The concern is understood but the SPD route is intended to enable planning framework to be put in place quickly once the overall scale of development and spatial strategy has been established through JCS process.

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Main Issues raised	Officer response
	Nevertheless, in view of the fact that many landowners/prospective developers have chosen to submit individual responses, Members need to consider if there is a stronger argument for the additional certainty an AAP might confer, and weigh that against the likelihood it would take longer to deliver in a time when applications in response to the limited land supply can be expected.
Eco Town was imposed by the Government	<ul style="list-style-type: none"> <li>o The proposal for an eco community was supported by the District Council and GNDP but not on the basis that it would increase the scale of development, but that it would result in higher environmental standards with additional costs supported by central government funding</li> </ul>
Local views and expressed responses to earlier consultation have been disregarded	This is not accepted. It has to be acknowledged, however, that any strategy involving large-scale growth is likely to arouse opposition in some quarters
Object because of impact of growth triangle on Wroxham (and proposals for Wroxham) contrary to express wishes of local residents	The proposals for Wroxham and any potential impact that the growth triangle may have will be matters which can be considered at the examination
No consultation on growth point status	Growth point status did not determine the scale of growth proposed for the area. That was initially established through the RSS before growth point status was considered.



#### 4.9 FC 9 Locations for major new or expanded communities in the Norwich Policy Area (Policy 10)

(Page 7 in Statement of Focussed Changes document)

Representations received	
Total	148
Compliant	
Not compliant	11
Sound	2
Unsound	146

Main Issues raised	Officer response
Given that FC8 and FC 9 are complementary rewording to two different parts of the same policy, it is understandable that many of the points made are common to both, and the points made above have also been made to FC 9.	The same responses apply to the points raised in respect of FC8
Policy is inflexible in that it does not pay adequate regard to the need for/potential of smaller sites in and adjacent to Rackheath but outside the current eco community proposal. It therefore fails the test of soundness. Policy should have made provision for such sites to come forward independently of the large scale proposal. Detailed policy working to address this is suggested. "A single coordinated approach will be required to deliver strategic levels of growth across the whole area. More detailed masterplanning will be required for each quarter. Small sites and non strategic growth will be permitted at Rackheath when it can be demonstrated that development would not prejudice the delivery of the Eco community proposal and that it can be accommodated within existing or expanded infrastructure capacity limits. Such sites will help to deliver the Broadland "small sites" in the NPA requirement (2000 homes)....."	There is no reason why small sites if appropriate could not be included in the masterplanning exercise provided they made appropriate contributions to infrastructure. This should, however, be achieved by a coordinated approach across the area
Objection to the reference to "a single coordinated approach will be required across the area. More detailed masterplanning will be required for each quarter". Objector (prospective	The idea of a "single coordinated approach" to the strategic planning of the area is fundamental to the SPD and should not be written the out of the policy

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Main Issues raised	Officer response
developer) nonetheless supports the need for coordination and remains committed to working with other landowners and the Councils. The words criticised are believed to lack clarity	
Oppose the principle of strategic allocation as this would limit future community involvement – believe this would be used to set a precedent for development across the entire Greater Norwich area, contrary to the Government's localism agenda	The principle of the strategic allocation could not be applied elsewhere unless confirmed through the JCS
Further detailed criticism of the significance, the role and reliance on the NDR and Postwick Hub, arguing that the latest announcements on these schemes cast yet more doubt on their deliverability	NDR issues will be debated at the examination

### 4.10 FC 10 Appendix 5, concept statement for growth triangle (Pages 9-28 in Statement of Focussed Changes document)

Representations received	
Total	174
Compliant	
Not compliant	12
Sound	2
Unsound	172

Given that FC8 and FC 9 are complementary rewording to two different parts of the same policy, and the concept statement at FC 10 elaborates these, it is understandable that many of the points made are common to all 3, and the points made above have also been made to FC 10. However, in making comments on the FC 10, many have elaborated their reasoning in respect of the contents of the concept statement.

Main Issues raised	Officer response
Criticism of the NDR proposal including too far out, encouraging infill building, insufficient regard to historic parkland and Ancient Woodland, inadequate funding and uncertain delivery	The principle of the NDR will be debated at the examination. There may well be further public inquiries at the planning application stage looking at more detailed matters of alignment. The fact that, in the wider interest a route for a major piece of infrastructure crosses historic park

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Main Issues raised	Officer response
	land does not imply that all historic park land, even locally designated, is without environmental value
<p>Support the concept of detailed master planning for the northeast, but; concern about the reliance of the policy on the uncertain provision of the northern distributor road; statements in the concept statement linking the delivery to a commitment to providing NDR need to be more thoroughly tested; detailed criticisms Include incomplete references to county wildlife sites (Para 6); reference to increased visitor pressure on habitats should refer instead to pressure on species (Para 7); needs to more explicitly refer to water quality as an issue for appropriate assessment; concern about the uncertainty of delivery of water infrastructure (Para 14); support the vision for multifunctional network of greenspaces and stress the current deficiency (detailed guidance available from the Natural England website ) (page 13); concern that recent "charette" promoted by landowner indicates there will be in difficulties in delivering some of the policy aspirations in the concept statement (Para 18);while multifunctionality should be a general aspiration, some land needs to be specifically reserved for biodiversity benefit (Para 20); endorse the assumption that opportunities to exceed the minimum open space must be taken (Para 33); need to incorporate more robust wording linking phasing of development to provision of the infrastructure (Para 43). These issues need to be resolved at the Joint Core Strategy stage.</p>	<p>The NDR is seen as fundamental to accommodating development on this scale. This will be a matter for debate at the examination. Accept need to check and verify references to County Wildlife Sites, though the concept statement was not intended as an audit of all specific citations. While the water issue, specifically the potential impact of abstracting more water to accommodate growth and means to avoid adverse impact are highly relevant and will be considered at the examination, this is an overall issue rather than one which relates specifically to the growth triangle. The recent "charette" clearly indicates the challenges around accommodating development without detriment to existing environmental assets. The charette was not promoted by the local planning authorities but has clearly raised alarms within the local community, and, it appears, with Natural England. The reference to linking development to provision of infrastructure has been a regular feature of discussions with Natural England. It is very difficult at the core strategy stage to give the degree of precision which Natural England seeks. The wording as drafted is considered to be appropriate for a core strategy, particularly as the concept statement specifically requires (Para 52) sustainability appraisal, habitats regulations assessment and health impact assessment, even though these are not automatic requirements of SPD.</p>
<p>Dispute the assertion that there is capacity for 4000 properties within existing sewers (Para 14) water cycle study planned for the eco community will identify and addressing the network</p>	<p>This was one of the outputs of the water cycle study in which Anglian Water participated, and it is a matter of concern that they express this reservation. Updated position</p>

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Main Issues raised	Officer response
issues	statements are being sort from Anglian Water, Natural England and the Environment Agency in the light of the completion of the Environment Agency's review of consents. Although this is primarily concerned at this stage with adequacy of water sources in relation to the River Wensum SAC, this will provide an opportunity to explore this.
Specific objections to proposals promoted through the recent "charette" promoted by a landowner in the area	This was not promoted by the local planning authorities but has clearly raised concerns among local residents who may be more difficult to reassure if the SPD route is followed.
Does not comply with the Government's green paper, Open Source Planning and its emphasis on plans responding to local people's views, to have consultations inviting comment on draft documents, rather than taking public views into account and building the document up from the foundation of local views	While the thinking behind the comment is understood, the Government has made no changes to the planning system other than a decision to rescind the RSS. To date the process governing local development framework preparation remains unchanged. Furthermore, the Government has expressly indicated that it seeks to increase rates of house building, and one of its principal criticisms of "top down targets" is the failure to deliver the desired rate of building. Under these circumstances seeking to undertake a complete review of the JCS would be counterproductive. However in terms of how to proceed from here, Members need to consider if there is a stronger argument for a more community focussed building of the detailed plans once the JCS has established principles.
Access considerations to the wider area mean the south and west is better connected, and as a consequence many facilities (UEA, hospital etc) are located in that part of the Norwich area	The overall pattern of growth will be tested at the Examination
Forecasts following RSS targets are largely self fulfilling i.e. provision of houses will lead to migration	Notwithstanding previous levels of development, there is still evidence of housing stress. PPS 3, published by the current government indicates the

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	kind of evidence needed to justify locally derived targets. The available evidence tends to support the broad scale of growth being proposed.
Dispute the value of NDR to NATS, and challenge prospects of delivery	This will be debated at the examination
Employment areas such as Broadland Business Park have access to the southern bypass and are not dependent for their success on new housing nearby	The proposals are intended to contribute to meeting the overall housing requirement in the area, but in terms of location, proximity to major employment areas such as Broadland Business Park is clearly a benefit
Plans in concept statement do not show all current planning proposals (Brook Farm)	The plans in the concept statement do not show current planning proposals. They show existing commitment including local plan allocations.
General support but wording in paragraph 47 needs to be clarified. As drafted it states that "any development beyond existing planning permissions and allocations and an exemplar scheme at Rackheath would be dependent on the provision of [an orbital link between Sprowston fringe and Broadland business park]" This is something over which the developers at Rackheath are likely to have no control, and as drafted, this limitation would still apply even if the NDR were already in place. (prospective developer)	<b>This is a fair point, and if the focussed change is submitted, redrafting of paragraph 47 to avoid this anomalous position would be appropriate</b>
General support but identification of issues which need to be addressed these include: relationship between different types and scales of plans: clarification of all future appraisals and assessments: is Rackheath really so much of an exemplar while at an embryonic stage?: evidence underpinning 2000 units limit before NDR: employment land distribution: housing types too prescriptive: effects of development on historic parkland is too hard line: infrastructure still needs greater definition (prospective developer)	Relevance of NDR, and ability to accommodate development before it is likely to be debated at the examination. In many ways the representation illustrates the challenge of producing the concept statement. Many prospective developers seek to increase flexibility, while many residents and environmental bodies seek to reduce flexibility and create greater certainty. Overall, the concept statement is still considered to strike the right balance. It is important to stress that the concept statement does not include proposals maps as of this would infringe upon the SPD/masterplanning process which would need to be undertaken in consultation with all interested parties.

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	<p>Instead it seeks to highlights constraints which will need consideration, and the potential offered by unconstrained land. <b>In response to questions raised by the inspector it may be advisable, if the focussed changes are submitted, to clarify the status of some of the constraints illustrated and highlight the fact that not all are absolute.</b> Members need to consider if there is a stronger argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind.</p>
<p>Detailed criticisms including suggestion to add "as part of the planning application process" to the end of paragraph 1: need for more clarification about how the coordinated approach will enable achievement of objectives: paragraph 17 remove sentence referring to the Rackheath concept statement that emphasises the need to prepare a SPD in partnership between local community, landowners and developers to define the quarters: paragraph 24 dealing with locally generated energy should be deleted: paragraph 31 should be amended to take a longer view of the split of tenures for affordable housing: paragraph 33 fifth bullet point delete "further": paragraph 33 sixth bullet point delete final sentence which states the opportunities to exceed minimum open-space/green infrastructure requirements should not result in a reduction in other categories: paragraph 43 indicate that the quantum of development that can be achieved should be informed by the detailed modelling and innovative strategies towards non car modes – as a consequence paragraph 44 which emphasises the role of the NDR in the transport strategy can be deleted: paragraph 51 amend wording to omit reference to other members of the Greater Norwich Development</p>	<p>The comments include a number of detailed wording suggestions, <b>some of which may be acceptable</b> but in other areas however may raise concerns. Omitting reference to locally generated energy would be undesirable. Paragraph 30 does take a long view of affordable housing tenure split. It is important that all categories of green space are provided, and one should not be at the expense of another. The need for the NDR to accommodate the scale of development proposed will be debated at the examination. The limitation of masterplans to the planning application process is not accepted. Paragraph does not preclude this but there is no reason why masterplanning should not take place ahead of the preparation of planning applications.</p>

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Partnership, specifically refer to infrastructure providers but omit separate reference to the public: paragraph 53 at the end of first sentence add " as part of the process of preparing planning applications" (prospective developer)	
Objects to the changes to the process which would deny people the opportunity to challenge detailed proposals at a public examination	The primary reason for proposing the strategic allocation and SPD route was to enable a planning framework to be put in place quickly to deal with anticipated pressures in the light of the need to demonstrate a five year housing land supply – still a requirement of the present Government. There is no intention to avoid public consultation, but it is true that the process would not involve a further public examination. That is the reason for a relatively detailed concept statement, but Members will need to weigh this argument in the balance in deciding whether to submit the focussed change
Oppose the emphasis on developing farmland, probably the most important natural resource we have, need for food security means all existing brownfield sites should be developed before any new greenfields. Others express similar sentiments about woodland, open spaces, historic parkland etc	Proposals to develop Greenfield sites, where the agricultural, Woodland or other forms of undeveloped land are not lightly made. However the scale of development required to meet the forecast need means that it cannot all be accommodated on previously developed land.
Would set a precedent which could be followed elsewhere in the GNDP area contrary to the Government's localism agenda	It would not –purpose of the focussed changes is to identify the area of a strategic allocation which differentiates it from other proposed locations
The concept statement is not sufficiently clear about the role of retail in district centres. A number of detailed changes are suggested to add more explicit references including: paragraph 1 first sentence: second sentence of vision: in objectives, under services, first bullet point: paragraph 32 first sentence: paragraph 32 final sentence needs to be reworded to make clear that the	The objection proposes a number of detailed wording changes. <b>Some may be considered acceptable.</b>

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district centre will need to be accessible to existing neighbourhoods as well as new quarters within the growth triangle	
Concern about democratic impropriety resulting from consultation in the holiday period, and the fact that an SPD would not involve further public consultation. Also concerned about reports of local woodlands being considered for development. Support wider spread of more small scale development around the county.	The timescale was largely dictated by the need to proceed to an examination in November. There is no intention to avoid public consultation, but it is true that the process would not involve a further public examination. That is the reason for a relatively detailed concept statement, but Members will need to weigh this argument in the balance in deciding whether to submit the focussed change. The issue of local woodlands derives from the developer promoted "charette". The overall strategy within the strategy area will be considered at the examination, but it is not possible to commit additional development in other parts of the county.
It is unreasonable to introduce a 19 page concept statement and to deny people the opportunity to add to their original representations. There is a need for more profound public engagement than has been offered.	People were invited to comment on the focussed changes. By definition, the original representations did not concern the focussed changes as these had not been published. The original representations will still be considered by the inspectors. The scale of the concept statement was dictated by the desire to strike a balance between offering flexibility and clarity. Clarity is generally sought by residents and can only be offered through a degree of detail which means a relatively lengthy document.
Capacity of the triangle to accommodate development without encroaching on environmental assets has not been demonstrated	There has been a high level attempt to assess the capacity in the form of an informal "land budget"; this is available as a background paper
No evidence to show that reliance on NDR is compatible with reducing reliance on private car, promoting public transport, walking and cycling. In any event, delivery of NDR cannot be relied on (drawing on correspondence	The necessity, role and function of the NDR will be debated at the examination, along with its prospects for delivery.



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between Government and Norfolk County Council) similarly there is now doubt over the Postwick hub (also based on correspondence between Government and Norfolk County Council)	
Paragraph 10. Cannot regard NDR as part of the baseline as it has not yet been built. County council has not committed plans to delivering any large-scale changes in the reallocation of road space, and the proposals map in appendix 5 (constraints and opportunities) shows only a single BRT route. Paragraph 44 Not justified -- there is no clear evidence to show the NDR is needed to solve the existing transport problems in Norwich. Reliance on the NDR for a major component of the JCS allocations means that JCS is unsound because of the risks to delivery of the NDR, compounded by the lack of any indication where else that development might be accommodated. There should be an examination of alternatives including accommodating growth to the northeast of Norwich without an NDR, and alternative locations for growth.	The necessity, role and function of the NDR will be debated at the examination, along with its prospects for delivery.
Paragraph 31 housing type and tenure is fundamentally flawed because of the failures in the underlying basis for the 40% affordable housing requirement which apply to the whole strategy. The same objector has challenged the affordable housing viability report on the basis of the assumed current level of developer contributions (the study assumed a current base level averaging £7000 per dwelling, offering a worked example based on current planning application, and the assumptions on how land values relate to deliverability through the incentivisation of owners to sell. In spite of these findings, the viability study suggests that sites will be viable in only 30% of the scenarios tested. This is not an adequate basis to	The same objector has challenged the viability study and this will be a matter for debate at the examination. Clearly the concept statement should be consistent with the evidence base for the strategy as a whole.

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justify the policy stance. The contributions assumed in the study are contrasted with the scale of infrastructure costs identified in the Infrastructure Needs and Funding Study undertaken by EDAW/AECOM (prospective developer)	
The concept statement relies too much on the existing environmental designations, including some local ones, in particular open space and landscape designations. These need to be reviewed in order to enable appropriate development, including connectivity and multi-functionality without unduly fragmenting the resultant communities. The text of the document and the constraints maps need to be amended to make clear that these represent existing local designations and a review of local designations would form part of the SPD process (prospective developer)	This illustrates the dichotomy of views between prospective developers and many residents. <b>In response to questions raised by the inspector it may be advisable, if the focussed changes are submitted, to clarify the status of some of the constraints illustrated and highlight the fact that not all are absolute.</b> Members need to consider if there is a stronger argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind.
Strongly support the proposal for enhanced orbital link between Broadland Business Park and Sprowston fringe. The Council should be prepared to countenance early development to create such a link. Dispute the suggestion that this could only be sufficient for 2200 dwellings as indicated in paragraph 45. they should be further evaluation of the potential for such orbital roads to replace sections/all of the NNDR if funding is not available and identification of sufficient information to indicate that the growth triangle is developable at the level proposed without the NNDR. This is particularly important because of shortfalls and uncertainty over funding of the NNDR (prospective developer)	The limitations of what can be built in advance of the NDR are likely to be debated at the examination
Paragraph 5 of the vision of FC 10 refers to minimising detrimental impact on the environment in all its guises. Under the terms of the Habitats Directive and the Conservation of	Environment in all its guises includes factors such as the setting of conservation areas, distant views etc which extend beyond the habitats regulations. The wording is considered

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Habitats and Species Regulations 2010 development must avoid adverse effects, not simply minimise them.	appropriate
An AAP is the appropriate mechanism for developing policy governing comprehensive land designations to provide for major urban extensions. The necessary consideration and impact resulting from the growth triangle is far too great to be contained within an SPD. The proposal is contrary to PPS 12 (prospective developer)	This is a different response from that of most developers who seek to change the concept statement in the direction of more flexibility. Members need to consider if there is a stronger argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind and whether this should follow the AAP route (or any replacement process introduced by the new Government) so that more formalised examination will be undertaken.
Uncertainty over the NDR has increased since submission. The reference in the focussed changes to the need for "permeability" across the NDR illustrate that a road of this nature is not suitable within an urban extension. Concept statement still talks of aspiration for tram – train but no work has been done on this. Not clear how bus rapid transit will effectively service all new "quarters" in the triangle. Doubts about delivery of green infrastructure and protection of environmental assets are reinforced by the recent Belmore Park "charette". The concept statement should not accept a lower standard than the stated policy aim of zero carbon status by 2015, but should specifically favour non biomass crops as a source of energy to avoid supplanting food production. Water neutrality and a commitment to no overall increase in water usage should be guiding principles of the growth strategy, including measures to improve the water efficiency of existing development.	The NDR will be debated at the examination. This is expected to include potential for crossroad movement. Tram train was principally introduced as a concept by promoters of the eco community and, while welcome, is not seen as the cornerstone of good public transport strategy. It is undeniable that the "charette" has introduced a great deal of local anxiety. With regard to local energy generation, the "default position" in paragraph 24 is the requirements of the relevant policy in the Joint Core Strategy. This seems entirely appropriate. It is not considered appropriate for the concept statement to specify particular fuel sources for local energy – though this will need to be undertaken through more detailed masterplanning/SPD
Not enough commitment to cycle facilities – need for high speed cycle link engineered for the 45 mph cruising speed achievable by high efficiency cycles is needed to avoid the loss of an	There is a commitment to cycle facilities. The NATS implementation plan demonstrates this, though it does not specify the need for high performance facilities.

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existing world leading cycle development undertaking	
Doubt the commitment to build upon the eco credentials of the area – how many wind turbines, how many water mills, what quantity of biomass will be generated from reed beds?	An attempt to specify the precise mechanism for production of local energy would be excessive detail in the concept statement.
<p>Reiterates previous comments about the soundness of the JCS as a whole. Specifically oppose strategic allocation – testing and consultation with the public and service providers have not been undertaken and critical infrastructure cannot be relied upon. The nature/mix of development and justification of the defined boundary is not sufficiently firmly established to make an SPD an appropriate vehicle. It therefore fails to meet the guidance in PPS 12 and is unsound because it is not “founded on robust and credible evidence base” and not “the most appropriate strategy when considered against reasonable alternatives”. Similarly it fails to meet guidance published by the Planning Inspectorate (Examining Development Plan Documents: Learning from Experience; paragraph 31) in that detailed delivery matters such as availability and infrastructure requirements have not been resolved. There is no demonstration how the strategic allocation will be delivered in a single concept master plan, and the diagrams do not indicate which land is available and expected to be relied on and delivered to meet the growth. Concern over ambiguity about the use/ future of organised recreation facilities, and concern over the implication that grade 2 agricultural land will be developed (land owned by Norfolk County Council). Matters such as this should have been resolved by a detailed concept master plan ahead of the strategic allocation. The environmental impacts of the NNDR do not appear to have been taken into account in setting</p>	<p>The JCS as a whole will be tested at the examination including the role, function and deliverability of the NDR. Similarly infrastructure will be required whether the growth triangle (if confirmed in principle through the examination) is treated as an allocation to be guided through masterplanning/SPD, or a location to be guided through the production of an AAP. The area of the growth triangle was shown in the submitted version of the JCS and has not changed. In practice it is bounded by the urban edge and the proposed route of the NDR with an extension to encompass the land promoted through the eco community proposal. It was never envisaged as “wall to wall” development and the concept statement was an attempt to put flesh on the bones. The principle of the growth triangle is believed to be sound and will be tested at the examination to judge whether it is the most appropriate strategy. The principle of a major growth location has been the subject of repeated iterations of sustainability appraisal, and the extended SA. has looked at how the concept statement elaborates on policies already examined. Nevertheless, Members need to consider if there is a strong argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind and whether this should follow the AAP route (or any replacement process introduced by the new Government) so that more formalised examination will be</p>

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<p>boundary of the strategic allocation, nor have uncertainties over its delivery been adequately covered by flexibility in the concept statement. This is contrary to the implication in the concept statement that the NDR can be relied on (paragraphs 10 and 44), the timescale of the exercise to produce and consult on the focussed changes has not permitted adequate scoping of testing of suitable alternatives to comply with the SEA directive</p>	<p>undertaken.</p>
<p>No objection in principle, but Highways Agency has a concern that without careful planning there is a danger that the area will be developed in a piecemeal way. In working with the County Council on developing the evidence base for the transport policies in the area and developing a junction scheme for the improvement of Postwick junction, there has been an underlying assumption that sustainable growth in the area would be accompanied by high modal shift away from travel by private car. If this is not achieved there is some risk that the highway network will not be able to cope with potential future levels of traffic and this could have the long-term bearing on achieving planning consents for development towards the end of the plan period. Highways Agency would prefer to return to the concept of an area action plan, but if not it is important that mechanisms are put in place to ensure growth takes account of the "big picture". (Highways Agency)</p>	<p>The concerns of the Highways Agency are not so much with the aims of the concept statement but whether it can be delivered through an SPD route rather than an AAP. The lack of consensus amongst landowning interests/prospective developers, particularly in the southern part of the area, does add fuel to this concern. Members need to consider if there is a stronger argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind and whether this should follow the AAP route (or any replacement process introduced by the new Government) so that more formalised examination will be undertaken.</p>
<p>Believe the concept statement is not "effective" because of restrictions on the delivery within the area and not flexible because it fails to take into account locations for development consistent with policies in other parts of the document, putting delivery at risk due to its extensive rigidity. The emphasis on protection of historic park land and local designations of landscape value is unjustified and contrary to national</p>	<p>One of the purposes of the concept statement was to identify areas of local environmental value, and this is considered a fundamental part of it. Some clarification about the precise status of designations such as landscape value and county wildlife sites might be appropriate as requested by the inspectors, but their presence cannot simply be dismissed. Members need to consider if there is a</p>

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<p>guidelines. The NDR itself cuts through historic park land, and a blanket restriction on the other development is unreasonable. Delivery is dependent on the eco towns programme and if funding for this, or the NDR upon which the Rackheath scheme is dependent, should be restricted, there is likely to be a shortfall in delivery. The concept statements indication of 170 to 200 hectares being made available for the delivery of 6000 dwellings (Para 29) leaves little room for error. The concept statement itself Indicates that "Detailed masterplans" for parts of the growth triangle should be delivered, and it is these that should determine precise locations for development and areas to be protected from development rather than the core strategy. In order to achieve delivery, the concept statement should allow greater flexibility rather than its current definitions of constrained land. Paragraph 18 of the concept statement and the constraints and opportunities mapping should only include nationally designated constraints. Wildlife corridors and open space and amenity areas can be provided in the more detailed master planning stages to provide open space and protect historic landscape and natural assets(pro prospective developer)</p>	<p>stronger argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind and whether this should follow the AAP route (or any replacement process introduced by the new Government) so that more formalised examination will be undertaken.</p>
<p>The diagram in the concept statement showing transport facilities shows sections of a road linking Broadland business park to the Sprowston fringe, but with a gap between Plumstead Road and Salhouse Road. This gap should be closed by the obvious "missing link". Objectors have long argued excessive reliance on the NDR and such a link would enable development to proceed in the interim. Racecourse plantation is rightly shown as a county wildlife site and area of landscape value, but the designation is inaccurately defined and includes a small area of former pig farm buildings</p>	<p>The map illustrates current proposals whether taken from the adopted local plan or NATS implementation plan. The "missing link" does not feature in the adopted plan, and indeed cannot until issues at the Postwick junction are resolved, but the text of the concept statement does make clear that full consideration should be given to making this link (Para 26). Precise locations for development would need to be worked through detailed masterplanning, but the scale of development proposed means that wherever located, it should be possible to access a good standard of</p>

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<p>which should be incorporated in any development in the area. Challenge the implications in paragraph 42 of the concept statement – Thorpe End has a good service base with a wide range of shops and is ideally suited to expand. While there may be local resistance, localism should not mean simply what one village wants – it should involve the wider community to establish what is best for the wider community, not simply a village by village approach. Because of this unreasonable restriction on the potential for development in Thorpe End, paragraph 42 is unsound (prospective developer/landowner)</p>	<p>social facilities. It would be <b>appropriate to check the detailed boundary of the Racecourse Plantation County Wildlife Site before the concept statement is finalised.</b></p>
<p>Fails to address the fundamental objections to concentrated growth in this area. Unreasonable to prevent people adding to original objections. Concept statement contains some changes to the JCS but is fundamentally a restatement of the ideas in the main text, still harking back to previous Governments policies, including eco towns. Amounts to a wish list without sufficient substance to justify the SPD approach, and fails to meet requirement that consultation is undertaken in a way and time when those consulted can influence the outcome. Growth triangle is strategically the wrong place to promote growth in the Norwich area, no suggestion of waste recycling in the draft waste management plan produced by Norfolk County Council. Green infrastructure would be massively eroded by the development. Past record in providing special, distinct and exciting places to live and work is not good. The argument of paragraph 5 (should refer to paragraph 3?) is to enable development to progress in a timely and controlled manner. This is inconsistent with the approach in the rest of the JCS. Broadland abandoned proposed consultation on site allocations DPD– concern that this was delayed because</p>	<p>It is true the concept statement does not represent a fundamental shift in the overall scale of growth or the strategy –it is an elaboration of policies already within the JCS. As such, the consultation was intended to be about how a major urban extension in northeast could be delivered. The principle of the strategy will be tested at the examination, along with the deliverability of infrastructure. Development can contribute towards green infrastructure but it is undeniable that a considerable amount of Greenfield development will be needed to deliver the scale of development considered to be necessary. This however is the case whether the growth triangle were to be delivered through SPD/masterplanning mechanism or an AAP. Additional recycling facilities are likely to be needed to deal with overall growth, and it would make sense to incorporate facilities within the major growth location. The County Council has been involved in the preparation of the strategy throughout. The SPD route was considered appropriate to speed up the development of a planning framework as the current absence of a five year land supply is likely to lead to development</p>

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<p>it would highlight the full scale of the plan. Ratio of house price to income interesting but a consequence of many factors, not simply supply. Major development on this scale has never been achieved in the area before – a more dispersed approach would be better. Document is unclear/ambiguous/inconsistent about energy and water. Health facilities also a constraint. The recent evidence on failure to expand existing primary school casts doubt on the ability to create a secondary school by 2026. Similarly, track record does not indicate ability to deliver high quality public transport. Tram train concept is flawed. Must continue to question reliance on NDR and its prospects of delivery and underlying model outputs. Broadland has poor track record of community engagement as evidenced by the Ecotown Programme Board, so can have no faith in final section of concept statement. Area action plan is the appropriate mechanism to plan an area of major growth, and is subject to independent examination and sustainability appraisal</p>	<p>pressures as the housing market picks up. The decision to rescind the RSS was a consideration in Broadland's decision not to progress consultations on site specific allocations, because it was necessary for the JCS to give certainty over the future scale of development. However once the certainty is restored it will be necessary for a more detailed framework to be put in place quickly. Members need to consider if there is a stronger argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind and whether this should follow the AAP route (or any replacement process introduced by the new Government) so that more formalised examination will be undertaken. The examination will consider whether there is a reasonable prospect of the necessary infrastructure being delivered. With regard to schools, the County Council has been part of the GNDR and involved throughout the preparation of the JCS.</p>
<p>Opposition to development proposals for Wroxham and impact of growth triangle on the village</p>	<p>The examination will consider the suitability of Wroxham to fulfil the role of key service centre as well as proposals for the growth triangle</p>
<p>Response offering general support to the principle of major growth in the northeast in the form of an urban extension. The landowners in this part of the northeast, the nascent Broadland land trust produced a number of collective presentations and commissioned a scoping exercise for an Enquiry by Design. However due to complexity of formulating collective promotion arrangements and the changing planning and financial context, the respective landowners have promoted their holdings separately in advance of a legally formalised consortium of partnership. There is</p>	<p>Support in principle is welcome, but it is a matter of some concern that landowners are not yet able to act in a coordinated way. It is a matter of concern that the objection states that the scale of growth promoted by the objector can be accommodated without the NDR. Some shared infrastructure will demand a commitment to a particular scale of growth, and this can only be accommodated if the NDR is committed. If committed, some growth could take place in advance, but the general scale referred to in the concept statement is as advised by</p>



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<p>support in principle for the urban extension, and much of the concept statement but detailed criticism, meaning the concept statement is unsound as drafted. Key areas of disagreement include: the inner link between Sprowston and Broadland business park passes through clients land. Completion of this link is supported, but the objector argues that this potential means there could be a commitment to some growth ahead of the NDR to a greater extent than acknowledged by the local planning authorities: the land ownership of the objector is adjacent to the urban fringe and comprises a natural location for the urban area to grow organically and sustainably: county wildlife site designation should not be an impediment to development, as development will facilitate heathland restoration, and management of woodland for recreational rather than commercial purposes – landscape should not be seen as static – excessive reliance on existing designations ignores the complexity and timeframe involved in bringing together neighbouring sites which can create a coordinated and more sustainable approach to growth: development of a landscape framework will need to recognise a fundamental shift in the character of the area from urban fringe towards an integral set of neighbourhoods. Protection of natural features will be important, but such features must also respond to a changing role: the landscape and wildlife qualities of the county wildlife sites in the objectors ownership are not uniform: objectors land ideally located to promote sustainable transport, and to facilitate improved orbital connections to major employment areas. Well located in relation to proposed BRT route. Believe that the levels of growth promoted by the objector can be delivered without the NDR through the</p>	<p>the County Council as transportation authority. The County Council's evidence will justify this. The purpose of the concept statement was to promote a mechanism for coordination, and it is only through co-ordination that the scale of development on any particular parcel of land can be determined. Detailed investigation may demonstrate some development could be accommodated within county wildlife sites without compromising their ecological value, but the start point should be that their value is not compromised. <b>If a concept statement is to go forward, consideration will need to be given to the detailed suggestions for wording.</b> Many of those relating to the aims and objectives appear reasonable. However cannot accept that the outcome of a "charette" which looked only at the objector's land is a suitable basis for co-ordinated masterplanning. If the eco community remains, the aspiration is to form a cornerstone of an entire urban extension setting the highest standards of sustainability. Accept that walking, cycling and public transport nodes should focus on local service areas, but this could be achieved through masterplanning. Paragraph 48 states that it is anticipated that development will progress in all quarters concurrently. This was intended to indicate that there would be no artificial restraint on development, rather than to indicate that development in one quarter would be held back until the others were "ready to go". Given that the paragraph acknowledges the need to deliver dwellings rapidly, the meaning is considered clear enough.</p>

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<p>provision of this link –the soundness of the JCS is threatened by the failure to distinguish between growth quarters such as the land promoted by the objector that can come forward without the NDR and those that cannot: recognise the constraints highlighted in the concept statement but comment that these do not present any unusual or unexpected constraints in the context of significant growth –recognise the need for coordination between development “quarters”, but this should not preclude an incremental approach when infrastructure can be phased to unlock successive waves of development: broadly support vision but first paragraph should reflect the fact that landscape and heritage assets will have the changing role within the fabric of the area, and references to local food links and production, fourth paragraph add references to physical linkages between the old villages of the growth triangle and suburbs of its hinterland to promote integration and equity of access to facilities and add reference to the knowledge economy: general support for objectives, but in housing objectives introduce more emphasis on the need for different life stages to be accommodated in the context of a balanced community, economic development more emphasis on mixed use development proposition, some detailed wording changes, more emphasis on creation of an environment to stimulate new business growth and expansion, local business creation and self employment opportunities, emphasise the eco excellence of growth triangle as a means to promote intellectual capital and business and training opportunitiesand, in environment objectives add emphasis on local food and fuel supply and reinforcing local supply chains, and emphasise provision of leisure/well-being, educational and productive opportunities: refer to the “ charette”</p>	

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<p>recently promoted which will form the basis of a master plan for the development of the objectors land and point out that " charettes" have been cited as a potential mechanism for engaging communities in the context of the government's localism agenda: paragraphs 18 to 21 – important to recognise the changing context in which landscape features will sit. The value of existing designations such as county wildlife sites and local landscape designations can only be judged through more detailed local investigation, and should not be seen as a blanket obstacle to development – as with other aspects of the strategy economic sustainability should be a key consideration in planning green infrastructure: paragraph 24 object to the statement that buildings in the area will be expected to comply with the requirements of the eco towns policy statement – this only applies to Rackheath – extending the standard is onerous and not justified: paragraph 26 Sprowston –Broadland Business Park link will enable delivery of the urban extension in this part of the triangle in advance of the NDR: paragraph 33 accept that a coordinated approach to development in the area will be needed and could take the form of a supplementary planning document but need not constitute a full masterplanning exercise: paragraph 36 broadly support the principles, but more emphasis should be given to the provision of sustainable transport interchanges where walking, cycling and public transport routes converge, and the location such interchanges should have regard to public services facilities of major infrastructure elements to be determined through the SPD: paragraph 44 – object to the statement that there cannot be a commitment to large-scale development in the growth triangle until there is sufficient certainty of the construction of</p>	

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the NDR –objector has already demonstrated that some development can take place with the provision of an alternative orbital link: paragraph 48 – object to the statement that development in all quarters should progress concurrently.	

N. B.

If, having considered the response, members conclude that the focussed changes involving the proposal for a strategic allocation based on the concept statement should be formally submitted, it will be necessary to indicate to the inspector where minor changes in the light of the response would be acceptable. **Some such changes are shown in bold text in the table above.** Given the timescale to submission, this will require some delegation agreement.

### 4.11 Supporting evidence: Affordable Housing Viability Study

Representations received	
Total	4
Compliant	
Not compliant	
Sound	1
Unsound	3

Main Issues raised	Officer response
The study underestimates the scale of developer contributions correctly and likely to be required and therefore its judgment on the viability of affordable housing contributions as unreliable ( one representation includes an example from a current application)	The affordable housing study was undertaken by Drivers Jonas Deloitte who will be invited to defend it
The study does not accurately reflect stakeholder concerns expressed at a workshop held to inform the study	The affordable housing study was undertaken by Drivers Jonas Deloitte who will be invited to defend it
The study's assessment of land values in particular for greenfield sites underestimates the price, or other considerations, needed to incentivise landowners to sell and again this affects judgments about viability	The affordable housing study was undertaken by Drivers Jonas Deloitte who will be invited to defend it

## Appendix 1

Main Issues raised	Officer response
Disagree with the calculation of overall plan-wide affordable housing and its relationship with policy target of 40%	The calculation of an overall plan wide target is considered to be a reasonable approach
The study's assumptions on density are unrealistic, and lower densities prevalent in parts of Broadland and South Norfolk mean that its conclusions cannot be relied upon. The table in annex 1 of the statement of focussed changes showing anticipated affordable housing contributions from existing planning commitments illustrates this discrepancy.	The affordable housing study was undertaken by Drivers Jonas Deloitte who will be invited to defend it
It is important to maintain the emphasis on affordable housing as its provision is a significant factor in improving health outcomes across the population.	Noted

### 4.12 Supporting evidence: Sustainability Appraisal update

Representations received	
Total	5
Compliant	
Not compliant	4
Sound	
Unsound	4

Main Issues raised	Officer response
The SA does not adequately reflect the reliance on a major road scheme, or the need to conserve water supplies and agricultural land	The strategy for growth in the Norwich policy area in the JCS is predicated on the delivery of the NDR. The spatial plan must take account of the transport strategy as outlined in the local transport plan. Given the significance of the NDR proposal in relation to the local transport network and the potential it offers for improved public transport, it would be remiss to propose a strategy which did not take account of it. At each stage in the JCS's preparation the certainty of delivery of the NDR has been maintained or

## Appendix 1

Main Issues raised	Officer response
	enhanced.
The SA was not compliant with the SEA Directive's requirement to give the public an early and effective opportunity to express their opinion –complaints relate to the timescale of the consultation and limited publicity, particularly as the underlying aim of the focussed change regarding the growth triangle is to avoid the need for public examination of an Area Action Plan	The SA was undertaken by Scott Wilson who will be invited to defend their work. The SA recognised that the concept statement and other changes to policy were building on the original policies which had been subjected to SA and considered whether the elaboration on the original policies would have any relevant consequences
It fails to address the requirements for an alternative to the growth triangle in the event of the NDR/Postwick hub not going ahead.	The strategy for growth in the Norwich policy area in the JCS is predicated on the delivery of the NDR. The spatial plan must take account of the transport strategy as outlined in the local transport plan. Given the significance of the NDR proposal in relation to the local transport network and the potential it offers for improved public transport, it would be remiss to propose a strategy which did not take account of it. At each stage in the JCS's preparation the certainty of delivery of the NDR has been maintained or enhanced.
The lack of testing against an alternative means it is not possible to demonstrate that the preferred strategy is the most appropriate	The issue of flexibility will be one of the matters considered at the examination, but it would be perverse if the strategy did not take account of the biggest proposed investment in the transport network in the area.
The SA relates only to the statement of focussed changes. Because these address only some of the issues raised at the Exploratory meeting, it follows that the scope of the SA is too limited	The statement of focussed changes invited comment on those areas where it was considered the additional work required by the inspector would result in changes to the JCS. In other areas, where no change is proposed, the original SA work is still valid.
In particular, the strategy lacks a "plan B." and is therefore unsound. Because there has been no sustainability	The issue of flexibility will be one of the matters considered at the examination, but it would be perverse

## Appendix 1

Main Issues raised	Officer response
appraisal of a plan B, it follows that the sustainability appraisal process is flawed	if the strategy did not take account of the biggest proposed investment in the transport network in the area.
The SA derives from the original S. A's scoping report which did not allow for a strategic allocation. The SA is therefore flawed.	The SA was undertaken by Scott Wilson who will be invited to defend their work. The SA recognised that the concept statement and other changes to policy were building on the original policies which had been subjected to SA and considered whether the elaboration on the original policies would have any relevant consequences

# Greater Norwich Development Partnership

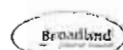
Appendix 1a

## Joint Core Strategy for Broadland, Norwich and South Norfolk

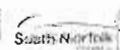
### Statement of Focussed Changes

July 2010

Jobs, homes, prosperity For local people



NORWICH  
City Council



South Norfolk

Norfolk County Council



## Foreword

The development of the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) has taken place over three years of evidence gathering, consultation and engagement. The JCS was submitted to Government in March 2010 after a period of pre-submission publication from December 2009 to January 2010. This period provided the opportunity for any interested party to challenge the "soundness" or legal compliance of the Strategy (see *Guidance Notes to Accompany the Representation Form for Development Plan Documents* for more information on "soundness and legal compliance").

Planning Inspectors appointed to examine the Strategy held an "exploratory" meeting on 13 May 2010 and recommended a small amount of additional work. As a result of this the Greater Norwich Development Partnership is consulting on some limited proposed changes to the submitted JCS. More information about the process can be found in *Local Development Frameworks: Examining Development Plan Documents: Procedure Guidance*.

Please note this current consultation relates only to three specific proposed changes to the submitted Joint Core Strategy. These are known as focussed changes and we are seeking your views on whether the Strategy would remain "sound" and "legally compliant" if they were made.

The proposed changes concern

- The provision of Gypsy and Traveller pitches to meet need arising after 2011 (Policy 4). This change results from revocation of the East of England Plan and the consequent lack of evidence at this time.
- The approach to seeking a percentage of affordable housing on development sites (Policy 4) resulting from new evidence on viability issues. To improve clarity we are also proposing to include an overall numeric target for affordable homes based on existing evidence of need.
- The reclassification of the Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle as a "strategic allocation" rather than a "strategic location". This would mean that future work could be progressed through a Supplementary Planning Document (SPD) instead of an Area Action Plan (AAP). This is supported by a new concept statement to be included as an appendix to the Strategy. This will provide a firmer basis to move forward with more detailed planning policies.

The response to the focussed changes will be considered by the Greater Norwich Development Partnership Policy Group and the individual local planning authorities in the autumn, before a final decision is made to submit the changes to the Planning Inspector.

Other work required by the Inspectors concerned providing clarity on elements of the evidence base, rather than changes to the Strategy. This work continues, but is not part of the focussed changes consultation. Details about this work can be found on [www.gndp.org.uk](http://www.gndp.org.uk).

Planning Inspectors will be examining the Strategy in a series of sessions starting on 8 November 2010 (details to be advised by the Programme Officer and published on [www.gndp.org.uk](http://www.gndp.org.uk)). The Inspectors will set the agenda for the examination and invite participants to attend. They will take account of the representations made during the December 2009 /January 2010 publication period, as well as representations regarding this Statement of Focussed Changes. At the Examination in Public, the Inspectors will also take account of the implications of emerging Government policy.

The anticipated timetable for the Examination in Public is:

Representation period for Statement of Focussed Changes	19 July 2010 – 30 August 2010
Date for submission of additional documents to the Inspector	Monday 4 October 2010
Policy Group meeting	23 September 2010
Broadland District Council full council	28 September 2010
Norwich City Council full council	28 September 2010
South Norfolk Council full council	To be confirmed
Norfolk County Council cabinet	11 October 2010
Examination in Public	8 November 2010 – 19 November 2010
Adoption	March 2011

If you have any questions about the process, these should be directed to the Programme Officer:

Simon Osborn  
1 Lower Farm Cottages  
Puttock End  
Belchamp Walter  
Sudbury  
Suffolk  
CO10 7BA

Email: [simon@poservices.co.uk](mailto:simon@poservices.co.uk)

## Making a representation

The Partnership is undertaking a six week public consultation and is inviting representations on this Statement of Focussed Changes. The consultation period is between 19 July 2010 and 30 August 2010.

The Focussed Changes consultation is not an opportunity for respondents to add to their original representation. The purpose of this additional six week consultation period is to consider whether the Statement of Focussed Changes addendum will ensure that the Submission Joint Core Strategy remains legally compliant and 'sound'. Representations should only relate to the Focussed Changes in sections 1, 2 and 3 of this document.

You may also wish to comment on the evidence that supports the focussed changes:

- EIP 52 Affordable Housing Viability Study
- EIP 53 Sustainability Appraisal of the focussed changes

The Statement of Focussed Changes is available online at **www.gndp.org.uk** and paper copies of the document and the comments form and guidance note can be obtained from each district office (details below) or by emailing **jointcorestrategy@gndp.org.uk**.

Representations should be made electronically where possible using the documents and response form available at the GNDP's online consultation portal, or emailed to the address above by **midnight on Monday 30 August 2010**.

Alternatively hard copies of representations can be submitted to:

### Greater Norwich Development Partnership

PO Box 3466  
Norwich  
NR7 7NX

Hard copy representations must be received by no later than **5pm on Monday 30 August 2010**. Late representations will not be accepted.

Please contact the teams in your area if you have any general questions about this consultation or the process.

Broadland District Council  
Planning Policy Team  
Thorpe Lodge  
1 Yarmouth Road  
Norwich  
NR7 7DU

t: 01603 431133  
e: [ldf@broadland.gov.uk](mailto:ldf@broadland.gov.uk)

Norwich City Council  
Planning Services  
City Hall  
Norwich  
NR2 1NH

t: 0344 980 3333  
e: [ldf@norwich.gov.uk](mailto:ldf@norwich.gov.uk)

South Norfolk Council  
Planning Policy Team  
South Norfolk House  
Swan Lane  
Norwich  
NR15 2XE

t: 0808 168 3000  
e: [ldf@s-norfolk.gov.uk](mailto:ldf@s-norfolk.gov.uk)



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**Annexes:** note annexes do not form part of the focussed changes

Annex 1: Affordable housing

- Overall Affordable housing target for Joint Core Strategy – background to calculation
- How the overall assumption for exception sites was derived



# 1. Focussed changes to Policy 4: Housing Delivery and supporting text

## FC1

### In Policy 4, delete

#### Affordable housing

A proportion of affordable housing, including an appropriate tenure-mix, will be required on site in accordance with the most up-to date needs assessment for the plan area, for sites of five or more dwellings (or 0.2 hectares or more). At the adoption of this strategy the target is 40% based on the most recent assessment.

In negotiating the proportion and tenure of affordable housing, account will be taken of site characteristics and the economic viability of provision. Where viability is an issue financial support will be sought via public subsidy, such as through the Homes and Communities Agency (HCA).

At appropriate settlements, sites that would not normally be released for housing will be considered for schemes that specifically meet an identified local need for affordable homes. Such schemes must ensure that the properties are made available in perpetuity for this purpose."

### Replace with

#### Affordable housing

A proportion of affordable housing, including an appropriate tenure mix, will be sought on all sites for 5 or more dwellings (or 0.2 hectares or more). The proportion of affordable housing, and mix of tenure sought will be based on the most up to date needs assessment for the plan area. At the adoption of this strategy the target proportion to meet the demonstrated housing need is:

- On sites for 5-9 dwellings (or 0.2 – 0.4 ha), 20% with tenure to be agreed on a site by site basis (numbers rounded, upwards from 0.5)
- On sites for 10-15 dwellings (or 0.4 – 0.6 ha), 30% with tenure to be agreed on a site by site basis (numbers rounded, upwards from 0.5)
- On sites for 16 dwellings or more (or over 0.6 ha) 40% with approximate 85% social rented and 15% intermediate tenures (numbers rounded, upwards from 0.5)

The proportion of affordable housing sought may be reduced and the balance of tenures amended where it can be demonstrated that site characteristics, including infrastructure provision, together with the requirement for affordable housing would render the site unviable in prevailing market conditions, taking account of the availability of public subsidy to support affordable housing.

At appropriate settlements, sites that would not normally be released for housing will be considered for schemes that specifically meet an identified local need for

affordable homes. Such schemes must ensure that the properties are made available in perpetuity for this purpose."

### **Reason for FC1**

To clarify the policy approach, and give more emphasis to the recognition that housing development viability is critical to the delivery of affordable houses on mixed tenure developments, taking into account the study of affordable housing viability undertaken by Drivers Jonas Deloitte. To clarify that where viability of the development is shown to be at risk, negotiations will include consideration of reducing the overall amount of affordable housing sought, and the balance of tenures within the affordable housing to restore the viability of the scheme. To clarify that, as part of the consideration of viability, the potential for public subsidy will be investigated.

## **FC2**

### **In paragraph 5.29, delete the following text**

"5.29 In some instances providing 40% affordable housing on-site will not be viable, without public subsidy. In such circumstances a financial contribution, such as a grant from the Homes and Communities Agency (HCA), will be sought. In order to create mixed communities, affordable housing provided as part of a market development will be expected to be integrated within the site."

### **Replace with**

"5.29 It is recognised that affordable housing provided through developer contributions in this way is dependent upon the overall viability of development. In some instances providing 40% affordable housing on-site will not be viable, without public subsidy. A study of affordable housing viability has concluded that smaller sites in particular may not be viable if the full 40% target were applied, but that in the market conditions prevailing in mid 2010, the 40% affordable housing target is achievable in a significant number of the scenarios modelled without social housing grant. Where this proves not to be the case financial contribution, such as a grant from the Homes and Communities Agency (HCA), will be sought. Where it can be demonstrated that the target requirement for affordable housing would make a site unviable in prevailing market conditions, taking into account policy aims relating to the environmental standards of homes, and there are insufficient public funds available to support affordable housing, a reduced proportion of affordable homes and/or an amended mix of tenures will be negotiated. In order to create mixed communities, affordable housing provided as part of a market development will be expected to be integrated within the site."

### **Reason for FC2**

To take account of the proposed focussed change FC1 and the conclusions of the Assessment of Affordable Housing Viability undertaken by Drivers Jonas Deloitte.



**FC3****In paragraph 5.28 delete the following**

"5.28 Affordable housing is defined as 'housing provided for rent, sale or shared equity at prices permanently below the current market rate, which people in housing need are able to afford'. The EEP has a regional target for 35% of all housing to be affordable and recognises higher targets may be required locally. The findings of the most recent housing needs assessment for the three districts indicates that 43% of overall housing need can only be met by affordable housing. Experience locally shows that 40% is the maximum achievable on sites without subsidy, in normal market conditions. A large amount of residential development is expected to take place on smaller sites in both urban and rural locations. If the PPS3 threshold of 15 dwellings were to be applied then a further significant undersupply of affordable dwellings would result. Consequently, in order to make realistic inroads into the identified need and provide affordable housing across a wide range of sites 40% affordable housing will be sought on all sites of 5 units or more.

**Replace with**

- 5.28 Affordable housing is defined as 'housing provided for rent, sale or shared equity at prices permanently below the current market rate, which people in housing need are able to afford'.
- 5.28A Based on the most recent assessment of housing need, there is a need in the plan area as a whole for about 11,860 affordable homes with approximately 60% of these being social rented, and 40% intermediate tenures from 2008 to 2026. This is derived from the annual net requirement for new affordable houses extrapolated over the plan period, and the backlog existing at the time of the housing needs assessment, with allowance made for the affordable housing provided up to the base date of this strategy. This represents just over 33% of the total housing requirement set out in the table above.
- 5.28B The most recent housing needs assessment for the three districts indicates that, in the short term, 43% of overall housing need can only be met by affordable housing. The policy target of 40% affordable housing on qualifying sites takes account of local experience which suggests that 40% is the maximum achievable on sites without subsidy in normal market conditions, the expectation of the Government's basic needs assessment model that current backlogs will be addressed in the short term, and the fact that not all sites will deliver the target percentage, for example because of viability issues, or previous planning policies in the case of sites with permission at the base date. The assessment of housing need also indicates that the current split of affordable tenures required to meet need in the short term, taking into account the current backlog, is approximately 85% social rented / 15% intermediate tenures, with the greatest need for social rented accommodation related to the Norwich urban area. The overall target, policy target, and balance of tenures will be kept under review in the light of updated information on housing need.
- 5.28C A large amount of residential development is expected to take place on smaller sites in both urban and rural locations. If the PPS3 threshold of 15

dwelling were to be applied then a further significant undersupply of affordable dwellings would result. Consequently, in order to make realistic inroads into the identified need and provide affordable housing across a wide range of sites a proportion of affordable housing will be sought on all sites of 5 units or more."

### Reason for FC3

To take account of the Government's revocation of the Regional Spatial Strategy (East of England Plan) and to introduce a plan wide target for the provision of affordable housing into the plan which meets the requirements of PPS3 that the provision of affordable housing should meet the needs of current and future occupiers taking into account the Strategic Housing Market Assessment. The requirement that account should be taken of viability and likely levels of finance available is recognised in FC1 and FC2, but in a volatile market, such factors are hard to quantify in the long term. To take account of the findings of the affordable housing viability study undertaken by Drivers Jonas Deloitte

## FC4

### At end of paragraph 5.30 add

"On the evidence of recent achievements and the programmed schemes in mid 2010, this is likely to produce about 1170 affordable homes between 2008 and 2026, though this is subject to the availability of funding."

### Reason for FC4

To give an indication of the potential contribution of Exceptions sites to meeting local housing need.

## FC5

### In Policy 4, delete

### Gypsies and Travellers

*Provision will be made for a minimum of 58 permanent residential pitches for Gypsies and Travellers between 2006 and 2011 to ensure full conformity with Regional Spatial Strategy Policy H3. These will be provided on the following basis: Broadland 15, Norwich 15, and South Norfolk 28.*

*Between 2012 and 2026, an additional minimum 78 permanent residential pitches will be provided to ensure full conformity with Regional Spatial Strategy Policy H3. These will be distributed on the following basis: Broadland 20, Norwich 20, and South Norfolk 38.*

These will be provided on a number of sites. Generally sites will not have more than 10 to 12 pitches, but may be varied to suit the circumstances of a particular site. The sites will be provided in locations which have good access to services and in locations where local research demonstrates they would meet the needs of the

Gypsy and Traveller communities. Some of the allowance to be provided after 2011 is expected to be provided in association with large-scale strategic housing growth.

In addition, 17 transit pitches will be provided, with the expectation that these will be provided by 2011. These will generally be in locations providing good access to the main routes used by Gypsies and Travellers, such as the A11, A47, A140 and A143/A1066. Again, sites would not normally be expected to accommodate more than 10 to 12 pitches.

Research also shows the need for additional plots for Travelling Show People. The expectation is that 15 additional plots will be provided by 2011 and a further 12 between 2012 and 2026. These will be located on sites within the Norwich urban area, or if sites within the urban area cannot be identified, close to it."

**Note** The text in italics was proposed in the submitted schedule of minor changes.

**Replace with**

## Gypsies and Travellers

Provision will be made for a minimum of 58 permanent residential pitches to meet the need arising between 2006 and 2011, provided on the following basis: Broadland 15, Norwich 15 and South Norfolk 28. The level of provision beyond that date will be based on updated local evidence of need.

Residential pitches will be provided on a number of sites. Generally sites will not have more than 10 to 12 pitches, but may be varied to suit the circumstances of the particular site. The sites will be provided in locations which have good access to services and in locations where local research demonstrates they would meet the needs of the Gypsy and Traveller communities. Some of the pitches provided after 2011 are expected to be provided in association with large scale strategic housing growth.

In addition, transit pitches will be provided based on local evidence of need. These will generally be in locations providing good access to the main routes used by Gypsies and Travellers such as the A11, A47, A140 and A143/A1066. Again sites would not normally be expected to accommodate more than 10 to 12 pitches.

Research also shows the need for additional plots for Travelling Show People. The expectation is that approximately a further 27 plots will be provided by 2026, on sites within the Norwich urban area, or if sites within the urban area cannot be identified, with easy access to it."

### Reason for FC5

To take into account the Government's intention to abolish the Regional Spatial Strategy (the East of England Plan) to substitute an appropriate locally supported target, and to indicate a mechanism for updating the target.

**FC6****Delete paragraph 5.32, and replace with**

"A partial revision to the East of England Plan in 2009 set requirements for the provision of pitches to meet the needs of Gypsies and Travellers in accordance with the requirements of Government Circular 01/2006. The target set was for 58 net additional pitches across the GNDP area to be provided by 2011. Beyond this the East of England Plan set an approach to longer term provision based on extrapolation which equated to a need for an additional 78 pitches between 2012-2026. The targets up to 2011 were broadly supported by the Greater Norwich Development Partnership authorities who considered them reasonable in the light of the Norfolk wide Gypsy and Traveller Accommodation Needs Assessment undertaken in July, 2007. However, beyond 2011 the proposed approach was disputed and the local authorities consider this level of need would be better determined by updated local evidence. It should be noted that a pitch represents a family unit and may therefore accommodate more than one caravan. On average about 1.7 caravans occupy each pitch. Since 2006, 11 pitches have been permitted or completed in Broadland, 14 in South Norfolk and an application for a further 3 is pending in Norwich."

**Delete Paragraph 5.35****Reason for FC6**

To take into account the Government's intention to abolish the Regional Spatial Strategy, to substitute an appropriate locally supported target, and to indicate a mechanism for updating the target. The intention to abolish the Regional Spatial Strategy makes the explanation in Paragraph 5.35 unnecessary.

**FC7****Delete paragraph 5.36, and replace with**

"There is a large existing site for Travelling Show People in Norwich, which is fully occupied, and local evidence suggests there is a need for further accommodation. Each plot will need to include room for vehicles providing accommodation and also for the maintenance and storage of fairground rides and equipment."

**Reason for FC7**

To take into account the Government's intention to abolish the Regional Spatial Strategy, and to substitute an appropriate locally supported target.

## 2. Focussed changes to Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

### FC8

#### Policy 10 delete

'Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle'

This location will deliver an urban extension extending on both sides of the Northern Distributor Road. "

#### Replace with

'Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle'

This strategic allocation will deliver an urban extension extending on both sides of the Northern Distributor Road, within the area shown in appendix 5."

#### Reason for FC8

To formalise the status of the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle as a strategic allocation in the Core Strategy.

### FC9

#### Policy 10 delete

"A single co-ordinated approach will be required across the whole area. More detailed masterplanning will be required for each quarter."

#### Replace with

"A single co-ordinated approach will be required across the whole area. More detailed masterplanning will be required for each quarter. The concept statement at appendix 5 sets out the area allocated, the main principles and parameters for the development and sets out how this will be achieved. The detailed masterplanning for the area will be expected to follow the principles set out in the Concept Statement."

#### Reason for FC9

To relate the policy to a more detailed concept statement to guide the urban extension.



### 3. Focussed change – Appendix 5

#### FC10

Delete Appendix 5

Replace with

#### **The Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle – Strategic Allocation Concept Statement**

##### **Introduction**

1. Policy 10 identifies this location, shown on map 1, for a major urban extension, providing for 10,000 dwellings (7000 by 2026) served by new local facilities to complement the houses, including social facilities and employment, waste recycling and extensive green infrastructure. The extension is served by the proposed Northern Distributor Road which will also facilitate the required emphasis on public transport, walking and cycling as principal modes of transport for the development. The policy requires that a coordinated approach to the development of the area be adopted. This statement is intended to give further detail and enable the development of the urban extension to progress through the preparation of a supplementary planning document leading to more detailed master plans.
2. The overriding priority is the creation of a special, distinct and exciting place to live and work, made up of communities with a strong sense of identity, respecting the features and settlements of the area and with ready access to work and facilities. Residents should be able to meet day to day needs locally but have easy access to the wider area. The keynote will be for the new development to minimise any adverse effects on the environment, and enhance it where possible. This concept statement seeks to help bring this about.

##### **Rationale for a Strategic Allocation in the Joint Core Strategy (JCS)**

3. The need to enable development to progress in a timely and controlled manner is one of the principal priorities of Broadland District Council and its partners. There are a number of underlying factors why this is important.
  - Experience of the Councils as housing authorities confirms increasing housing pressure. Numbers on the housing registers rose from 2606 to 3278 (Broadland) and 10,874 to 16,706 (Greater Norwich) between 2005 and 2009. In Broadland, the ratio of house prices to incomes rose from

5.85 to 10.28 between 2001 and 2008. An East of England housing statement produced in 2010 confirms that Broadland is among the ten authorities where this ratio is most acute, and neighbouring Norwich among those with the most rapidly rising ratio.

- There is an urgent need to plan growth to respond to the expected resurgence in the housing market rather than uncoordinated development. Planning policy statement 3 requires that if local planning authorities cannot demonstrate a five year supply of available and deliverable housing land, based on the provision required by the development plan they should respond favourably to planning applications to increase the supply. At 1 April, 2009, there was a supply of 6,609 dwellings compared with a requirement based on this strategy, of 9,115, equivalent to a supply of 3.63 years in the Norwich policy area.
- Enabling development to progress as a coordinated whole will help facilitate the early provision of necessary new infrastructure as efficiently as possible, by allowing some larger scale investment to be supported by sufficient residents. This applies particularly to secondary education, local energy generation and public transport investment. The Government supported the development of an Eco community at Rackheath through publication of a supplement to Planning Policy Statement 1 in 2009. It is expected to begin delivering new houses in 2011/12. Although this is a distinct proposal in its own right, it will need to dovetail with development in the rest of the growth triangle. The Rackheath development will also have attributes which will affect and influence the remainder of the growth triangle, for example aspiration towards water neutrality and the emphasis on non car travel. This will be the subject of detailed local research in partnership with the relevant agencies.

### Concept of development

#### Existing assets

4. It is essential that, although large scale development will bring about some changes in the character of the area, it is essential that it respects and protects the existing assets, and adds to them where possible. The assets are varied and include:

#### Landscape

5. The District Council had a landscape character assessment undertaken in 2008. All the land in the growth triangle is included within the "Wooded Estatelands" character area. A sub area of this character area includes all the land in the triangle immediately adjacent to the urban fringe. It has a mature landscape structure with more enclosure as a consequence of the trees in the landscape compared with the more open landscape in the west. Development



should respect the rural character, retaining and enhancing the landscape structure, including restoration of hedgerows, and the setting of halls or houses and parkland. New development should also seek to respond to the historic settlement pattern, and the landscape setting of the villages, maintaining the distinction between the urban edge and villages. In some areas there is an opportunity to soften the urban edge. The north eastern part of the triangle forms another sub area. Here the topography is generally flatter, with lighter sandy soils, much of it historically heathland. There are Historic Parks at Rackheath, and Beeston St Andrew though neither are on the English Heritage register. Similar considerations apply to this area, though the character assessment also refers to the need for caution in accommodating tall structures.

#### **Biodiversity**

6. Much of the eastern side of Broadland, including the growth triangle, lies close to the Broads, an area of international wildlife importance. Outside the growth triangle, but nearby, there are Special Protection Areas and Special Areas of Conservation to the south east of Brundall, at Woodbastwick Marshes, and a small parcel to the north of the triangle at Crostwick Marsh. Some of these in the area of the Broads are also designated as Ramsar sites. Within the growth triangle, there are pockets of ancient woodland, close to Rackheath Park, and at the northern extremity. In addition, there are ancient woodlands outside but near the triangle. County wildlife sites are designated at Racecourse Plantation, and in the vicinity of Rackheath Park and the watercourse north of Rackheath.

#### **Appropriate Assessment**

7. An Appropriate Assessment of the JCS under the Habitats Regulations concluded that direct or indirect effects on sites of European wildlife importance were unlikely but that at the detailed planning stage attention would need to be given to the cumulative and in combination effects, and this would need to feed through into subsequent planning documents. In the case of the growth triangle particularly, the key issue is the provision of sufficient attractive green infrastructure to mitigate against adverse effects from increased visitor pressure on sensitive Broadland habitats.

#### **Settlements**

8. Much of the area within the growth triangle is outside significant settlements. The exceptions are Rackheath, dominated by post war development, including significant employment development on the former airfield, and Thorpe End Garden Village. This was conceived as a garden village and developed in the 1930s. Subsequent development has eroded some of its original character, though this remains largely intact in the central core and southern part of the village.

#### **Employment**

9. The growth triangle includes significant concentrations of employment at Rackheath and the expanding Broadland Business Park/Broadland Gate. It is also close to significant employment areas at Salhouse Road, and near the Airport.

**Movement including NDR:**

10. Roads in the immediate vicinity of the triangle are predominantly radial, with several such roads providing links to the Norwich urban area, including the city centre, and to the major road network via the A1042/A140 outer ring road. The growth triangle is served by an existing station at Salhouse on the Norwich to Sheringham railway line. The line forms most of the eastern boundary of the triangle and can present a barrier to movements across the route. The area is close to Norwich Airport, though access and terminal facilities are located on the further, western side of the Airport. Car ownership rates in the triangle are currently significantly higher than for the East of England and England as a whole, particularly in the parts of the triangle furthest from the urban area. A Northern Distributor Road has been proposed for Norwich for some time. It has been awarded programme entry status by DfT. Funding for the construction of Postwick Hub has been made available by Government. As a long standing element of the Norwich Area Transportation Strategy it is part of the "base line" for the development strategy. It will provide the opportunity for the reallocation of roadspace to provide for high quality public transport, and enhanced walking and cycling.

**Existing constraints****Airport public safety zone:**

11. Norwich International Airport is subject to public safety zones extending beyond the runway. The eastern public safety zone extends as far as the North Walsham Road and severely restricts development potential within its defined area.

**Airport noise contours:**

12. The operation of the airport results in noise impacts in some of the nearby areas. Contours showing the predicted impacts of aircraft noise at 2015 further restrict the potential for development.

**Utility constraints:**

13. The area is currently crossed by EDF Energy electricity supplies, both overhead and underground at voltages up to 132,000 volts. Development will require a new primary substation on the site owned by EDF energy at Hurricane Way, as well as local reinforcements in the Sprowston, Rackheath and Thorpe St Andrew areas, either by improvement of existing primary substations or the creation of new primary substations. Overall growth in the Greater Norwich area is likely to require improvements to existing grid stations or a new grid station on a site owned by EDF Energy near Broadland Business Park.
14. Water is supplied from the Heigham waterworks. While additional supplies are likely to be needed around 2015 to deal with overall growth in Greater Norwich, and can be provided under Anglian Water's asset management planning process, there are no specific water supply issues relating to the growth triangle, though some local network reinforcement is likely to be needed particularly in the southern part. Wastewater will predominantly be processed at

Whitlingham sewage treatment works, or by innovative means in the Rackheath development. Initial transfer to Whitlingham would be possible utilising an existing strategic sewer with capacity for 4000 houses above current commitments. This will allow adequate time for necessary reinforcements to be programmed.

15. Gas supplies will need to be provided through connection to existing intermediate pressure mains.

### **Development Proposals**

#### **Vision/ objectives**

##### **Vision**

The Growth Triangle will have developed into a special, distinct and exciting place through the delivery of 7,000 new homes by 2026 and continuing to grow to around 10,000 new homes thereafter.

Alongside housing, employment opportunities, services, facilities and key infrastructure will have been delivered across three or four main development centres. Development within the Growth Triangle will grow out of and reflect existing places and communities.

Important landscape and heritage assets will have been preserved and enhanced. A multi-functional network of greenspaces and green links connecting to Norwich and the rural hinterland will have been provided. This green network will support the recreational and leisure need of the population whilst also supporting the conservation and enhancement of local wildlife.

The communities within the Growth Triangle will share a sense of identity rooted in respect for existing features of the area and its settlements and the enhancements and benefits provided by new development.

It will be easy to move around and within the three or four new development centres, between different centres and in to and out of existing settlements.

Physical linkages between the older villages of the Growth Triangle and suburbs of its hinterland will have been created to support community integration and equity in access to services and facilities.

Within the Growth Triangle employment growth will have been achieved, including within green industries, building upon the eco-credential and economic attraction created by the development of the Growth Triangle. In addition, first rate connections will have been provided to the key employment locations of Broadland Business Park, the Airport Industrial Estate and Norwich City. These connections will provide for a range of transport choice, which will include walking, cycling and public transport.

Development within the area will have been delivered in a way that will minimise its detrimental impact upon the environment in all of its guises. In particular, new buildings will have been built to high

sustainability standards, decentralised low carbon and renewable energy will provide for the energy needs of development, water resources will have been managed to reduce stress upon the water environment and public transport will offer a real alternative to the use of the private car.

Residents will be able to meet their day-to-day needs within their village or neighbourhood. Facilities that need to be used less regularly will be easy to access using a variety of modes of travel. Residents will have the opportunity to actively participate in the governance and management of their communities.

### **Objectives**

#### **Housing**

- To sustainably deliver 7,000 new homes by 2026, rising to around 10,000 thereafter.
- Secure sufficient levels of affordable housing for those in need, ensure that affordable housing is tenure blind and of the right type and size to meet demand.

#### **Economic Development**

- To identify suitable areas for employment land as part of mixed use development or as separate industrial estates and business parks.
- Create links to the key strategic employment sites in the hinterland of the Growth Triangle and in Norwich.
- Ensure employment growth within the Growth Triangle of a range and type that will give people a choice about where they can seek employment.
- Provide an environment that will be economically attractive to inward investment, building upon the eco-credentials of the area.

#### **Equity**

- Ensure ease of movement within and between new neighbourhoods and/or villages and into and out of existing villages and the Norwich fringe.
- Create an environment where integration of existing and new communities can be achieved.

#### **Environment**

- Protect and enhance the quality and distinctiveness of the biodiversity, geo-diversity and landscape of the Growth Triangle.
- Create a multi-functional network of greenspaces and green links which provide connections for people and wildlife to Urban and Rural hinterlands of the Growth Triangle.
- Ensure that new buildings and places achieve high standards of environmental sustainability.

#### **Services**

- Provide the services and facilities that will meet the need of the Growth Triangle as it grows.

- Design the Growth Triangle to allow residents to meet their day-today needs within their own village or quarter and create good connections to less regularly used services.

#### **Transport and Connectivity**

- Ensure that it is easy to walk and cycle around the new villages or neighbourhoods, and Norwich City, create good links between new villages or quarters and to the wider rural and urban hinterland.
- Design the area to provide a choice for travel other than the private car, providing excellent and reliable public transport links, for example to central Norwich and other employment locations.

#### **Governance**

- Ensure that community assets are governed and managed appropriately to fulfil the needs of residents.
- Create an environment in which residents can engage with the governance and management of community assets in their villages and neighbourhoods.

#### **Society and Culture**

- Provide the physical linkages that will help integration across the Growth Triangle and with its Urban and Rural hinterland.
- Create a place which is safe and which feels like it is safe.
- Create an environment where the facilities and support for healthy and fulfilling living are available.
- Ensure that places are designed to create a sense of place, balancing the need to preserve existing identities and forging new ones.

#### **Principles**

16. It is particularly important that the new communities created have a strong sense of place and are prepared according to coherent masterplans designed to achieve this objective for each of the individual "quarters".

#### **Distinct quarters**

17. The geography of the area, including its constraints and assets, suggests that development will tend to divide into discrete areas. Early development of the proposals for the development at Rackheath as set out in the concept statement submitted to Government in 2009 reinforced the view that the triangle should be designed around separate but linked quarters each having its own identity and local services, and defined by interconnecting green infrastructure. Some high level infrastructure will need to be shared. The current expectation is that there will be two further such quarters to complement the proposals at Rackheath.

#### **Landscape structure**

18. The landscape character assessment emphasizes the need to protect, manage and enhance historic parkland and the setting of

churches, halls and manor houses as well as maintaining the distinction between existing settlements and the main urban area of Norwich. It is important that these objectives are incorporated with the protection of the existing important assets including trees, copses and woodland, particularly Ancient Woodland, historic parkland and gardens, and County Wildlife Sites, together with the restoration of hedgerows and maintenance of the structure of hedgerow belts. The connectivity offered by hedgerows is an important factor emphasized by the green infrastructure work already undertaken, and should be reinforced. This will need to include links to existing assets to create "stepping stones" linking those within the urban area to the urban fringe, and the appropriate disposition of both informal and formal open space

19. Priorities for Green infrastructure in this area, defined as a Green Infrastructure priority Area, are set out in Appendix 5 to the Green Infrastructure Delivery Plan
20. The green spaces created should serve a number of functions including formal and informal recreation, biodiversity and sustainable drainage in the form of filter strips, swales and ponds where feasible, as well as providing important opportunities to improve cycling and walking links. Enhanced green infrastructure should also be used to provide a buffer around particularly sensitive ecological areas as well as the creation of new habitats such as heathland, wood – pasture, grassland and woodland. Several existing assets and constraints offer the foundation of a near continuous framework which can be built on, particularly restrictions on development immediately east of the Airport, and the connected or almost connected Beeston Park, Sprowston Park and golf course, Rackheath Park and associated Ancient Woodland. This, together with land forming the landscape setting of Thorpe End, Brown's, Belmore and Racecourse Plantations could form the basis of an extensive network of connected spaces to complement that being proposed at Rackheath.
21. These are complemented by land intended to remain open under appropriate management in accordance with existing planning commitments, at Cottage Plantation, Harrison's Plantation and Bear Plantation.

**Shared infrastructure/ sustainability criteria including code levels, district heating/local energy generation**

22. Shared high level infrastructure refers to those facilities which require a large catchment population to support them, or where the necessary investment will serve the entire area. In this respect the triangle as a whole will add to the sustainability of the Rackheath development.
23. This will include a high school. Currently, this is expected to

accommodate 1400 11-16 places, associated with 280 places for post 16 education. It may also be a suitable location for a swimming pool which is likely to be required late in the plan period and a 4 court sports hall. The requirements of sustainability and the presence of an existing high school at Sprowston suggest this may be best located at Rackheath.

24. Locally generated energy and district heating/cooling systems may be better provided in a centralised form, although a modular approach may be more effective, depending on the phasing of development across the triangle. This will need to be the subject of detailed local assessment. This necessary infrastructure in terms of transmission facilities will need to be considered as an integral part of the process. It is important that energy demands are minimized and the buildings in the area will be expected to comply, as a minimum, with the requirements of the eco towns policy statement within that part of the triangle, if it remains extant, and the requirements in policy 3 of this strategy.
25. Similarly, it is important that the area benefits from high quality communications, including broadband and mobile technology, and the infrastructure required for this will need to be conceived and designed for the development as a whole.
26. Coordination between the "quarters" will be necessary to ensure the most effective connections by public transport, walking and cycling, to local employment areas including the city centre, urban fringe, Rackheath, Broadland Business Park and the employment opportunities near the Airport. Similarly walking and cycling connections to local attractions including the surrounding countryside, high school, post 16 education and associated recreational facilities will need coordination. This will need particular attention to "permeability" across the Northern Distributor Road. Attention should also be given to the need to improve orbital connections within the area, other than the Northern Distributor Road. The previous local plan promoted an orbital link between the Sprowston fringe and Broadland Business Park, and retention or extension of this corridor, with emphasis on the promotion of non car travel should be given full consideration.
27. The Norwich Area Transportation Strategy includes proposals for bus rapid transit, with its hub in Norwich city centre, including a corridor serving the growth triangle. Full BRT will need to be introduced in stages as the development progresses, but a high quality conventional bus service should be introduced from the first phase of the project.
28. The Rackheath proposal concept statement includes an aspiration for the provision of a "tram-train" utilising the existing heavy rail connection to Norwich, but with the capability of "street running"

within the new community. This is likely to be dependent on overcoming operational barriers to the use of light rail rolling stock on heavy rail infrastructure. If this can be achieved it should also facilitate the provision of a station to serve Broadland Business Park. These opportunities should be exploited if possible, and safeguarded if not immediately possible.

#### **Housing density assumptions/ land requirement**

29. The development at Rackheath as currently promoted would provide just over 4000 of the 10,000 houses planned and additional employment at Rackheath. Within the remainder of the growth triangle, housing is likely to be constructed at an overall net density of 30 to 35 dwellings per hectare, requiring approximately 170 to 200 hectares of land to accommodate the remaining 6000 houses. However, a range of densities will be expected, with higher densities around centres and locations with particularly good access by non car modes. A further 100 – 110 hectares are likely to be needed for community facilities and recreation to meet recommended standards in this part of the triangle, with additional land required for the expansion of Broadland Business Park, and for inclusion of some local employment within housing areas as part of a mixed use approach.

#### **Housing type and tenure**

30. The housing types and tenures should reflect those needed overall in the strategy area. This will be subject to consideration at the time of development and the most up to date evidence at the time. At present the split between tenures should be 60% market and 40% affordable if the housing needs of the area are to be fully met. In the longer term, it is expected that approximately 2/3 of the affordable dwellings will need to be social rented, and 1/3 intermediate tenures, though dealing with current housing needs will require a higher proportion of social rented accommodation. The proportion of market, intermediate tenures and social rented will need to take account of factors prevailing at the time of development, including viability considerations and the availability of grant.
31. It will also need to take account of the expected ageing population and include lifetime homes and mixed tenure housing with care. A further consideration in meeting the needs of all sectors of the community will be examining the potential for residential sites for Gypsies and Travellers to meet part of the overall need identified in the joint core strategy.

#### **Mixture of uses/district and local centres**

32. It is important that masterplans for the area recognize the need for a rich mixture of uses including employment, commercial and community uses close to residential areas where compatible with residential amenity, to help people access services locally, give local employment opportunities, and maintain a level of activity



throughout the day. For this reason, district and local centres, schools and community facilities should be located within the "quarters", rather than at their periphery, unless they are expected to attract large numbers of visitors from outside the growth triangle or from other "quarters" within it. Particular attention in this respect will need to be given to the location of a district centre, and the high school and other facilities such as a swimming pool where access from all parts of the triangle is likely to be critical.

**Community infrastructure/social/faith/open-space including open space assumptions**

33. This is a large scale development, and it will require significant social infrastructure. Some of this will be shared infrastructure, referred to above but some will be more locally based. This will be refined through the masterplanning process but is likely to include
- 6 Two form entry primary schools, and 1 single form entry primary school, all with associated early years facilities and 2 additional early years facilities
  - 2 Primary care centres or equivalent facilities, each for 5 general practitioners and 4 dentists, and expansion of existing facilities to accommodate an additional 2 general practitioners and 3 dentists
  - 2 Combined community and library buildings, and 2 further community buildings
  - Provision for places of worship/ faith groups, probably through the multi-functional use of community buildings
  - A further 4 court sports hall
  - Open space in the form of Parks and gardens ( approximately 25 hectares, of which at least 15 hectares should be outside the Rackheath development ), natural and semi-natural open space ( approximately 82 hectares of which at least 49 hectares should be outside the Rackheath development), informal amenity open space ( approximately 5 hectares, of which at least 3 hectares should be outside the Rackheath development), provision for children and young people (approximately eight hectares, of which at least 5 hectares should be outside the Rackheath development), outdoor sports and recreation grounds (approximately 37 hectares, of which at least 23 hectares should be outside the Rackheath development), and allotments (approximately 3.5 hectares of which at least 2 hectares should be outside the Rackheath development). The Rackheath proposal may result in the residual requirements above, and hence total requirement in each category being exceeded. Similarly, opportunities to exceed the minimum in any one category should not result in a reduction in other categories.
  - Emergency services will need to be taken into account. The principal requirements are likely to be facilities for new or expanded safer neighbourhood teams, and consideration should be given to co-locating these with other social

infrastructure facilities. It is likely that 3 new safer neighbourhood teams will need to be accommodated, each consisting of 12 – 13 officers, together with expansion of an existing team.

#### **Environmental priorities**

34. Environmental priorities include the minimisation of energy demand, mentioned above, and the need for a reduction in the use and discharge of water. This will require a focus on water efficiency, potentially innovative solutions to the treatment of wastewater and extensive use of sustainable drainage systems. Evidence indicates that the infiltration capacity of surface geology varies across the triangle and the appropriate techniques will need to be the subject of detailed local investigation. This should be seen as part of a strategy to help minimise climate change and adapt to it and should also incorporate appropriate design and orientation of buildings, and their landscaping.
35. In terms of green infrastructure, the priorities have been established through the Green Infrastructure Delivery Plan prepared for the Greater Norwich Development Partnership and with reference to the Norfolk Biodiversity Action Plan which includes species and habitat plans and guidance on how development can complement biodiversity. It is critical that existing network of green assets is complemented by new green space to encourage continuity of green corridors. It is essential that sufficient attractive facilities are provided to avoid adverse impacts on nearby internationally recognized sites of wildlife importance.
36. The overall principle should be of public transport oriented design with neighbourhoods also designed to be permeable and highly attractive for journeys on foot and cycle, utilising green links where possible.
37. The cultural assets of the area should be fully recognized in the design and disposition of new development, in the form of designed landscapes, buildings, and evidence of the area's history..

#### **Health, community safety and Community building**

38. A successful community will also be safe and healthy. As well as provision for enhanced safer neighborhood teams, the detailed design of individual areas will need to take account of the need to minimize crime.
39. Similarly, new communities should be designed to promote health. Many of the principles outlined above contribute towards this, including the promotion of active lifestyles as well as primary health care facilities. Health promotion must also be consciously designed into the communities and for this reason it is expected that a Health Impact Assessment will be undertaken on individual masterplans.

This should be undertaken in stages including scoping, appraisal, and reporting and should be scoped and undertaken in consultation with NHS Norfolk.

40. A large new development will require help to form a cohesive community, for example through the development of local community groups. Inevitably in the early stages, residents are likely to look to the existing communities, but increasingly the new communities should be able to support groups and societies in their own right. Developers, the District and Parish Councils will need to work together to support this in a coordinated way by enabling facilities to be available and supporting community development initiatives.

**Relationship to existing Communities, Directions of growth and phasing**

41. It is important that new development integrates well with existing, but at the same time helps maintain the identity of different places. This will be a matter for detailed masterplanning but the submitted concept statement for the development at Rackheath shows development adjoining the existing settlement on its north side. Maintenance of a separate identity for Rackheath will be aided by the presence of the Northern Distributor Road, but should be reinforced by particular attention to the landscape setting of the expanded community.
42. It is expected that development elsewhere in the growth triangle will pay particular attention to its connections with the existing urban fringe of Old Catton, Sprowston, and Thorpe St Andrew, to enable shared use of infrastructure. In all cases, movement patterns should be designed to avoid subjecting existing or new residential areas to extraneous traffic. A landscape structure built on the foundations of existing assets can help to retain the identities of these quarters within the growth triangle, and also the identity of existing communities such as Thorpe End
43. One priority is to enable an adequate supply of housing land to be maintained to meet housing requirements in the area. Development will need to be phased in accordance with sound practice within each "quarter", and the provision of necessary infrastructure. Of particular importance will be phasing in relation to the delivery of the Northern Distributor Road, and wastewater transmission infrastructure in the form of a strategic sewer, or other equivalent provision, once capacity in the existing system is used. Existing strategic sewer capacity should be sufficient until approximately 2020/2021.
44. The Northern Distributor Road (NDR) is an integral part of the Norwich Area Transportation Strategy and considered essential to pave the way for interventions to create better conditions for public

transport, walking and cycling. It is therefore critical to a commitment to the scale of development proposed, which itself is required to support some of the high level infrastructure essential to the creation of sustainable communities. The NDR is needed now in order to resolve wider transport problems in Norwich; therefore there cannot be commitment to large-scale development in the growth triangle until there is sufficient certainty over the construction of the Northern Distributor Road. In the short term, subject to this commitment, development may commence before the NDR is completed, in parallel with interim improvements for other modes and the delivery of the Postwick Hub Junction improvements. There will be a limit on the number of dwellings which would be subject to the provision of appropriately detailed transport assessments by developers, which would also need to demonstrate investment in sustainable transport modes to minimise their traffic impact.

45. Initial assessments suggest that the short term impact of development in the region of 2200 dwellings may be acceptable in the knowledge that the Postwick Hub improvement will be delivered and the NDR is committed. This figure would have to be justified by scheme specific transport assessments by developers.
46. In addition to the above there is potential to provide part of the proposed low carbon development at Rackheath with an allowance of a further 1000 dwellings here, subject to similar certainty regarding delivery of the NDR. In addition, this number of dwellings would be expected to demonstrate half the amount of car-based trips when compared to a conventional housing development.
47. Any development beyond existing planning permissions and allocations and an exemplar scheme at Rackheath would be dependent on the provision of a link of the kind described in paragraph 26, which itself would be dependent on improvement to the Postwick junction.
48. In view of the need to deliver dwellings rapidly once the growth triangle gets underway, both to ensure the supply of housing land, and to limit the overall construction period, it is proposed that the development in all "quarters" should progress concurrently.

#### **SPD/Masterplanning process**

49. Policy 10 of this strategy, complemented by this concept statement including the map showing the extent of the growth triangle, and other illustrative material represent a strategic allocation, which will result in an amendment to the adopted Proposals Map in the Broadland Local Plan adopted in 2006.
50. Further detail of the proposals will be worked out through an overarching high level masterplan in the form of a supplementary planning document. One important task of this document will be to

ensure that the proposals for the individual "quarters" dovetail effectively, and benefit from thinking developed through work on the Rackheath low carbon development. This will need to cover a wide spectrum of considerations including, for example, the connectivity of green infrastructure to embrace the potential for technology such as combined heat, power and cooling, as well as the installation of the necessary broadband and mobile telephone infrastructure.

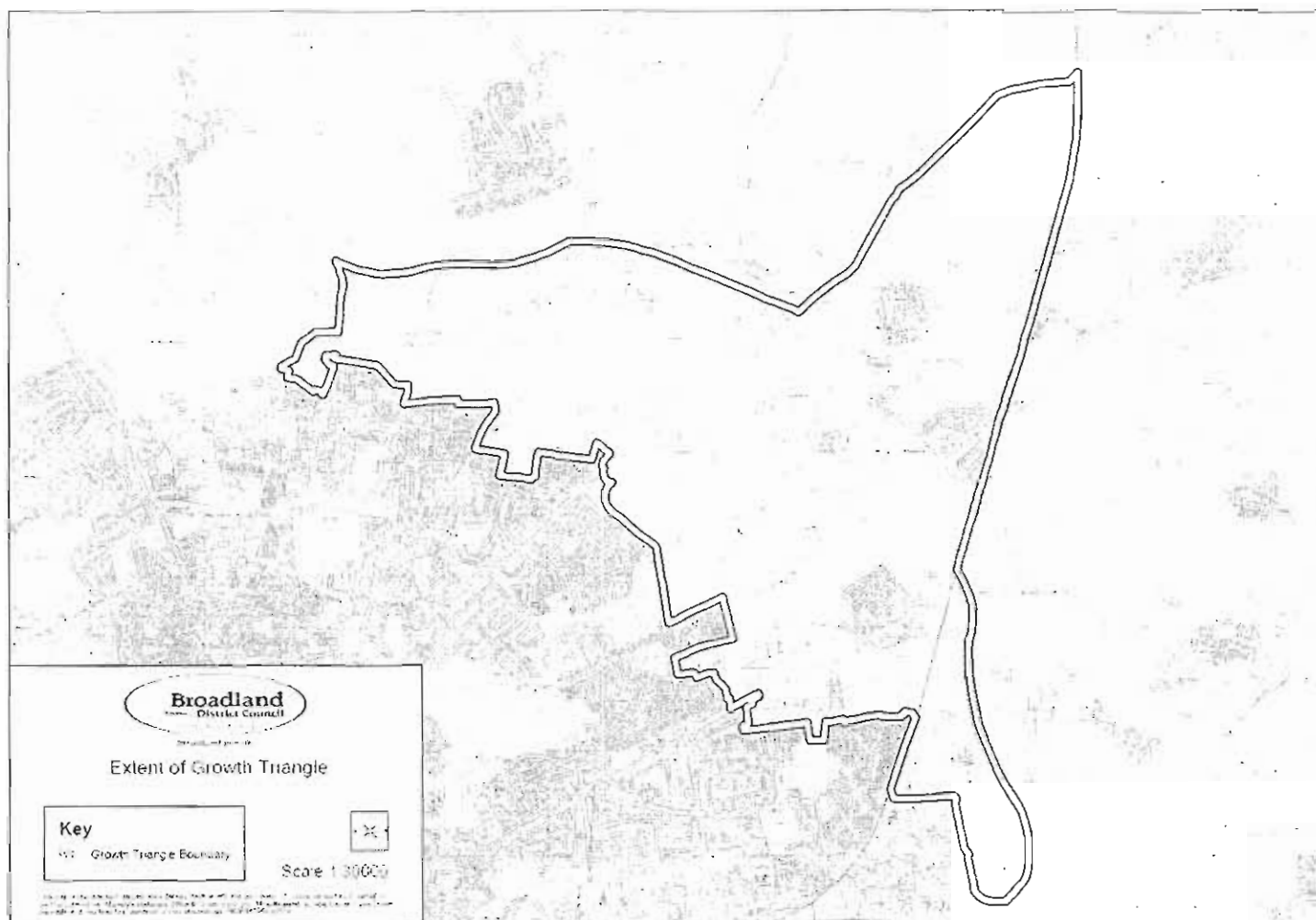
51. This will be prepared in consultation with the local communities and their representatives, other members of the Greater Norwich Development Partnership, service providers, environmental bodies, landowning and development interests and the public.
52. In view of the significance of the overall development and the sensitivities of the area, this will incorporate Sustainability Appraisal, a Habitats Regulations Assessment and a Health Impact Assessment. Its focus will be on the overall concept, landscape structure and provision of shared infrastructure, including its location and timing, and it will set the framework for more detailed masterplanning to be undertaken for each of the "quarters".
53. These will be led by the development promoters. The "daughter masterplans" will all be undertaken using a participative process to enable local communities to have a voice in the detailed planning of future development.

#### **Reason for FC10**

To provide more detailed guidance to support the strategic allocation of the Old Catton, Rackheath, Sprowston, Thorpe St Andrew Growth triangle.

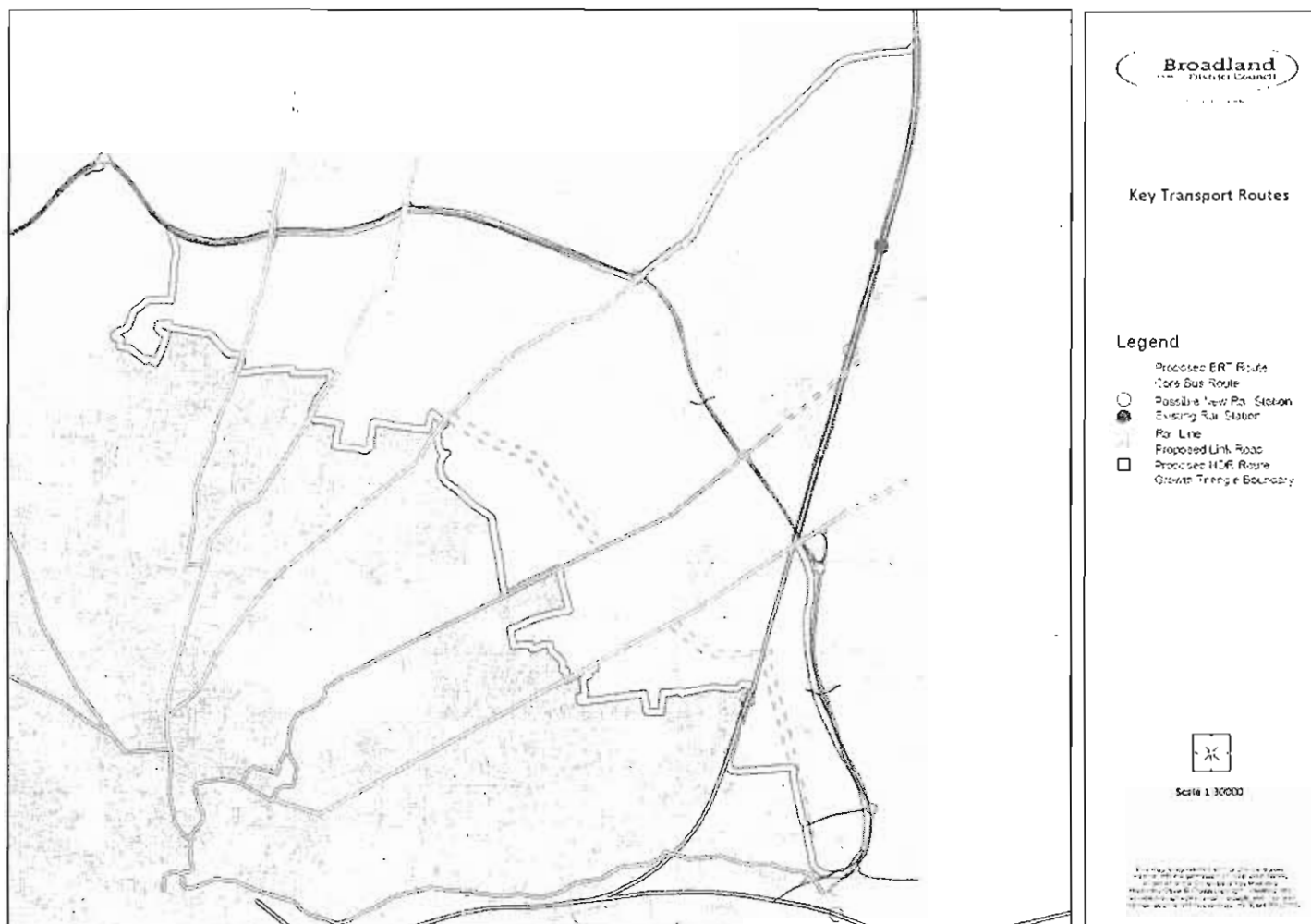
**List of maps**

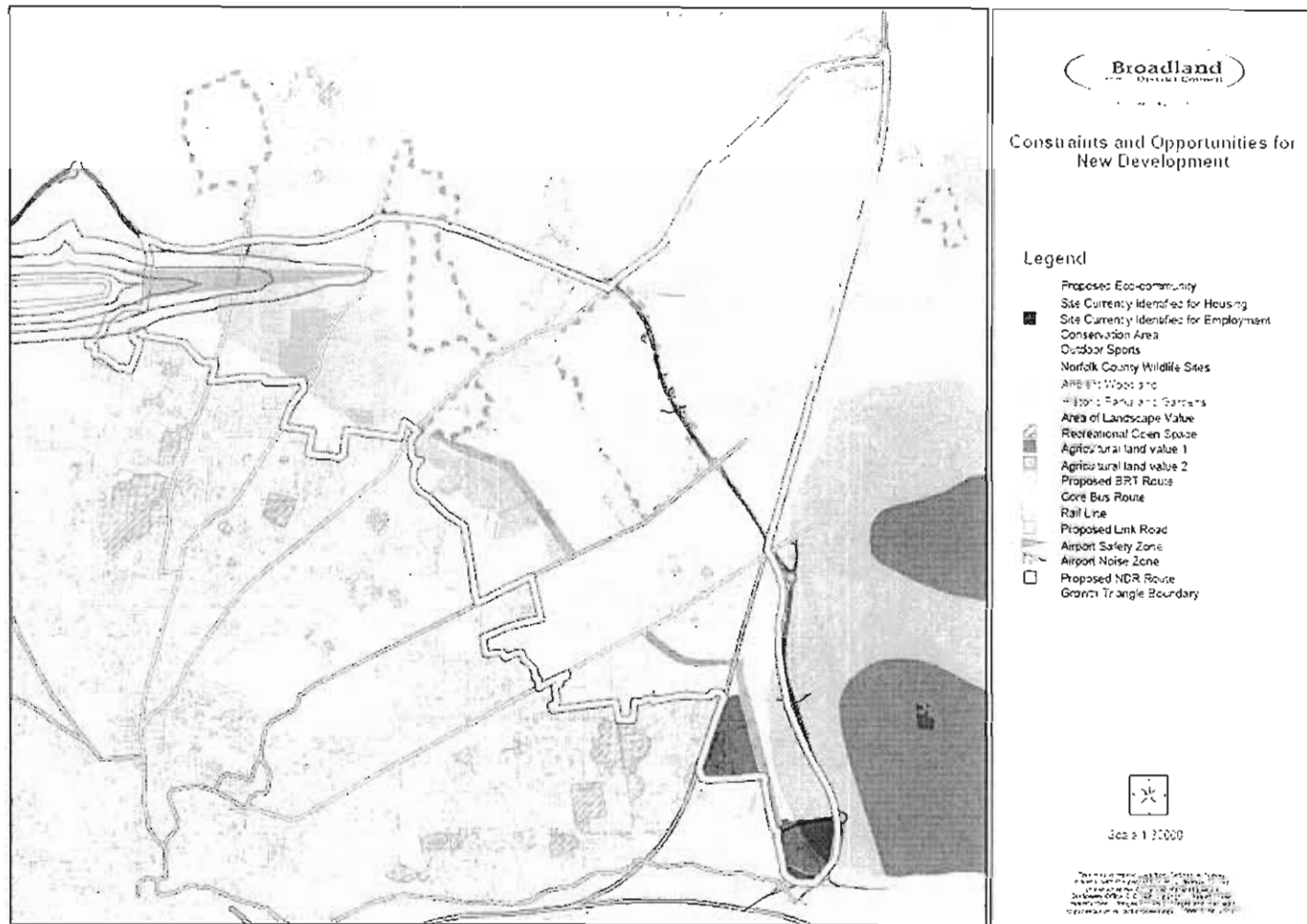
1. Extent of Growth Triangle
2. Areas of green space
3. Key transport routes
4. Constraints and opportunities for new development











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## Annex 1:

### Overall affordable housing target for Joint Core Strategy – background to calculation

Following an exploratory meeting on the 13<sup>th</sup> of May, the inspectors appointed to examine the soundness of the JCS indicated a number of areas where they wanted further work to be done before the formal examination. One of these concerns the need for an overall strategy-wide target for affordable housing.

Planning Policy Statement number 3, paragraph 29, states that the overall i.e. strategy - wide target for the amount of affordable housing to be provided should reflect an assessment of likely economic viability of land, taking account of risks to delivery and drawing on informed assessments of the likely availability of finance. It also states local planning authorities should aim to ensure the provision of affordable housing meets the needs of both current and future occupiers taking into account information from the strategic housing market assessment.

There are inherent difficulties in forecasting need so far ahead, given the time horizon of plans which is expected to be a minimum of fifteen years. Equally there are difficulties in forecasting viability and the availability of finance.

#### Preferred approach based on assessment of need

The approach taken has been to look at the levels of need according to the latest evidence (the 2006 ORS study forming the evidence base for a Strategic Housing Market Assessment [evidence document H 3], updated by the refresh of the HMA published in 2010 [evidence document H. 4]) and account of what has been achieved since H 3 was prepared.

In order to meet the overall housing need for the area of a total of 11,857 affordable houses would be required. This is based on the 2006 study, H3, with field work being done in 2005/6. This showed that at the time there was an overall backlog of 1403 affordable dwellings [10% intermediate tenure] and a net newly arising need of 561 dwellings pa (44% intermediate tenure).[Fig 161]

From the base date of the study, 2006, to the end of the Strategy period is 21 years. This would therefore imply a requirement at that time of  $(21 \times 561) + 1403 = 13,184$ . Of this total, 5315, or 40% would need to be intermediate tenures and 60% social rented.

In the three years 2005/6 to 2007/8, there were a total of 1306 affordable houses completed (net).

Therefore there is a residual requirement in the core strategy period of  $13,184 - 1,306 = 11,878$ . This compares with a total housing requirement of 35,660, [p43 of the submitted joint core strategy] or about 33% of the total.

It should be stressed however that these figures will need to be updated as the housing needs element of the evidence base produced in 2006 has a limited shelf life, and the Greater Norwich Housing Partnership is commissioning an update due to report in 2011.

The policy target is higher, because the Government's basic needs assessment model makes the assumption that any backlog at the time of the study is eliminated over the next 5 years. This therefore has the effect of increasing the affordable housing targets, and in the particular the social rented element.

Notwithstanding that, the ORS study (H3) recognised that many of those who, in theory, were at present outside the band that required social rented housing could not in practice afford any of the intermediate tenure products available and their needs could only be met in social rented accommodation. For this reason the study concluded that the intermediate tenure should be split and the lowest intermediate band and social rented housing combined. Figure 159 of the study reflects this, indicating an overall percentage requirement of 56.6% market, 5.4% upper/middle intermediate, and 38.0% lower intermediate/social rented. This suggests a tenure split within affordable housing of 12.4% intermediate and 87.6% rented, in the short term, if all need is to be met. This is largely confirmed by the 2009/10 update [evidence studyH4] (table 7.12) where upper and middle intermediate tenures account for about 15.7% of affordable housing need.

On the basis of performance between 2005/6 and 2008/9, provision has just about kept pace with newly arising need but made no inroads into the backlog. The 2003 affordable homes represent 26.7% of the total of 7505 completions, and slightly less than the implied  $561 \times 4 = 2244$  derived from the newly arising need identified (see above). Actual achievements (from Annual Monitoring Reports, which do not offer a split of tenure) are set out in the table below;

Year	SNC	Norwich	BDC	Total
2005/6	32	209	32	273
2006/7	117	277	107	501
2007/8	202	291	39	532
2008/9	379	235	83	697
Total	730	1012	261	2003

#### **Alternative approach based on policy targets and current commitments**

An alternative approach would be to look at the potential offered by the policy approach of seeking 40% on new allocations above the given threshold, and expectations from the current commitments. In reality this would mean seeking a 40% on all of the allocations proposed in the joint core strategy, as allocations are unlikely to be made for sites lower than the target thresholds of five units.

Estimates from the local planning authorities are that, at 2008, the base date of the JCS, the target affordable housing provision from commitments and that date were

Broadland	875
Norwich	2000
South Norfolk	836
<b>Total</b>	<b>3711</b>

The total allocations proposed in the joint core strategy approximate to 23,195 (based on mid point of rural allocations)

If all were to achieve 40%, this would result in  $23195 \times 40\% = 9278$  affordable houses. Adding the potential from existing commitments would result in a total potential of  $3711 + 9278 = 12,989$  affordable houses. This however rests on a number of assumptions

1. It assumes 40% is achievable on all new allocations, unlikely to be the case in the current economic climate.
2. It assumes current commitments achieve current policy targets
3. It assumes 40% is sought on all allocations even if future assessments demonstrate a lower level of need [the current 40% target includes allowance for eliminating backlog.]
4. The 40% target is based on pragmatism rather than need which is currently at 43% of all completions, not only those on qualifying sites, for the next 5 years
5. It does not include Exceptions sites in the future allocations component which could add 1170 units, subject to funding.
6. It takes no account of non S106 sources e.g. contributions from the HCA
7. This approach does not offer guidance on tenure split.

If a more cautious assumption is made regarding viability in prevailing market conditions,

- 50% of sites achieve 40% affordable housing;
- 50% of the remainder achieve 30%;
- the remainder achieve 20%;

The result is modified as follows;

Existing commitments total 3711

New allocations in the JCS total 23,195

- 50% ( 11,598) achieve 40% affordable providing 4,639 affordable houses
- 5799 achieve 30% affordable housing, providing 1740 affordable houses
- 5799 achieve 20% affordable housing, providing 1160 affordable houses

Under this scenario the total affordable housing provided would be  
 $3711 + 4639 + 1740 + 1160 = 11,250$  affordable homes

## Background to assumption on contribution of "Exceptions Sites"

The approach taken has been to look at recent performance and programmed future developments and take an average annual rate for each of Broadland and South Norfolk. The overall assumed contribution is the combined annual rate multiplied by 18 (the years between the strategy's base date and 2026).

This gives a total assumed contribution of 65 per annum, or 1170 over the period of the strategy.

Recent achievements and future programs are summarised in the following tables.

Exceptions sites contribution								
South Norfolk								
Parish	2005/6	6/7	7/8	8/9	9/10	10/11	11/12	notes
2 schemes	15							
0 schemes		0						
1 scheme			8					
1 scheme				4				
4 schemes					34			
Alburgh							4	
Alpington & Yelverton						5		
Ashwellthorpe							8	
Barnham Broom						4		
Bergh Apton						6		
Bunwell						6		
Carleton Rode						9		
Denton						6		
Diss / Roydon						51	51	
Dickleburgh						15		
Ditchingham (with Broome & Thwaite)							14	
Ellingham & Kirby Cane							8	
Marlingford & Colton							4	
Newton Flotman							13	
Scole						12		
Spooner Row							6	
Starston							5	
Talcolneston							8	
Thurlton						9		
Tibenham							5	
The Tivetshalls							6	
Wacton							6	

Wortwell							4	
<b>Total</b>	<b>15</b>	<b>0</b>	<b>8</b>	<b>4</b>	<b>34</b>	<b>123</b>	<b>142</b>	<b>326</b>

SNC total to 2011/12 ie 7 yrs = 326 i.e. 46.6 pa

<b>Exceptions sites contribution</b>								
<b>Broadland</b>								
<b>Parish</b>	<b>2005/6</b>	<b>6/7</b>	<b>7/8</b>	<b>8/9</b>	<b>9/10</b>	<b>10/11</b>	<b>11/12</b>	<b>12/13</b>
Blofield			12					
Cantley							5	
Felthorpe								5
Foulsham				10				
Freethorpe						7		
Great Witchingham				15				
Halvergate						5		
Horstead					8			
Lingwood and Burlingham			15					
Rackheath						6	6	
Reepham					10			10
Salhouse								10
South Walsham		8					6	
Stratton Strawless				4				
Tuttington				6				
<b>Total</b>	<b>0</b>	<b>8</b>	<b>27</b>	<b>35</b>	<b>18</b>	<b>18</b>	<b>17</b>	<b>25</b>

Broadland total to 2012/13 ie 8 yrs = 148 i.e. 18.5 pa

Over both districts the average pa is  $46.6 + 18.5 = 65$









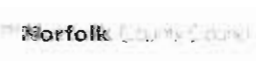
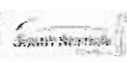
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for South Norfolk Council

Jobs, homes, prosperity for local people



**Draft response to inspector concerning the proposed changes to proposals maps of the three local planning authorities**

In response to the issues raised by the inspectors in their note dated 6 August 2010, the GNDP would offer the following comments

**1. Changes to the defined settlement boundaries**

It is accepted that a minor change consisting of an explanatory note following Policy 16 would help to make the document more user friendly and remain consistent with the changes to the proposals maps proposed.

This might take the form of text such as:

"N. B. This policy will necessitate a number of changes to the adopted proposals maps for Broadland and South Norfolk.

New settlement limits will be needed for Aldeby, Burgh St Peter, Caistor St Edmund, Claxton, Colton, Denton, Flordon, Forncett St Mary, Great Melton, Hardwick, Hedenham, Keswick, Ketteringham, Langley Street Marlingford, Shotesham, Starston, Swainsthorpe, Tibenham, Tivetshall St Margaret, Tivetshall St Mary, Toft Monks, and Topcroft Street.

These will be defined through the preparation of the South Norfolk Site Specific Proposals Development Plan Document

A limited number of existing settlement limits shown on the adopted proposals maps for Broadland and South Norfolk will be deleted. This applies to Felthorpe, Honingham, Upton, Ranworth, Wacton, Weston Longville and Woodbastwick. The policy change making this necessary will take effect on adoption of the Joint Core Strategy"

A similar note would be needed following Policy 15, as follows:

"N. B. This policy will necessitate a number of changes to the adopted proposals maps for South Norfolk.

New settlement limits will be needed for Alburgh, Bergh Apton, Bramerton and Carleton Rode.

These will be defined through the preparation of the South Norfolk Site Specific Proposals Development Plan Document"

In the case of the Broadland district settlements of Horsford, Horsham St Faith, Old Catton, Rackheath, Salhouse, Spixworth, Sprowston, Thorpe End, Thorpe Marriott and Thorpe St Andrew the published changes to the proposals maps do

not propose changes to settlement limits, and these will need to continue in force unless/until amended by new site specific policies. The changes to these proposals maps are solely concerned with the definition of the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle, and/or the route of the Northern Distributor Road.

## **2. Changes to the Norwich proposals map**

Justification for these amendments is covered in responses to Matter 6.

It is accepted that it is necessary to add a key to explain proposals map amendments.

The amendments made are part of the overall changes to city centre policy set out and consulted on through the JCS. In the adopted Replacement Local Plan both Riverside and Brazengate are classified as primary retail areas. Policy 19 on the retail hierarchy and accompanying text of the Regulation 27 and 30 consultation and submission versions of the JCS named Riverside as a large district centre, stating that, like Anglia Square/Magdalen Street, it supplements Norwich City Centre. The key diagram for the city centre, supporting Policy 11, of both the Regulation 27 and 30 documents identifies Brazengate as an "Other Shopping Area", not part of the primary retail area. The same diagram identifies Riverside as an "Area of Change", with a focus on commercial development. This change in policy is referred to in the city centre topic paper accompanying the Regulation 27 document. In addition, the proposals map for the Regulation 30 version shows Brazengate as a secondary shopping area and Riverside as a large district centre.

A representation to the Regulation 27 consultation opposing the redesignation of Riverside was received from Henderson Retail Warehouse Fund. Sainsburys Supermarket Ltd, the operators of Brazengate, objected to other retail hierarchy issues, but not to the redesignation of Brazengate.

Whilst these changes could be made through the Development Management DPD, they are made through this document as they are part of the overall strategy for the city centre.

## **3. Norwich Policy Area**

There is no inconsistency. The adopted South Norfolk Local Plan includes a specific map showing the boundary of the Norwich Policy Area. The adopted Broadland Local Plan proposals map shows the boundary of the Norwich Policy Area. The proposed amendment is to update the Broadland proposals map by the addition of the parish of Salhouse, not at present included in the Norwich Policy Area.

#### **4. Norwich Northern Distributor Road**

The JCS does not explain that the detailed route of the NNDR is being introduced to the proposals map for the first time. This has not been regarded as essential, but if the inspectors consider it helpful, a note to the effect of "the proposed route is shown on the Broadland District Local Plan proposals map" could be added following the first bullet point in Policy 6.

#### **5. Major growth locations and area action plans in South Norfolk**

The symbols proposed for addition to the proposals maps are not intended to give site specific information, since the core strategy is not expected to be site-specific with the exception of strategic allocations. They are intended to alert users of the proposals maps to the fact that, as a consequence of policies in the JCS, other documents are likely to propose significant future changes in the area.

It is accepted that this could usefully be augmented by cross references in the text. These might take the following forms:

- In Policy 10, following the sections on Wymondham and Long Stratton, insert footnotes saying "detailed proposals will be developed through the preparation of an Area Action Plan."
- In Policy 10, following the sections on Hethersett, Cringleford, and Easton/Costessey, insert footnotes saying "detailed proposals will be developed through the preparation of the South Norfolk Site Specific Policies Development Plan Document."
- In Policy 9, following bullet point relating to the expansion of science park activity at the University of East Anglia/Norwich Research Park (NRP), insert a footnote saying "in view of the specific nature of the employment sought in this location, including the need to dovetail with the aims of significant and diverse existing institutions, detailed proposals will be developed through the preparation of an area action plan, and a master plan for the UEA."
- The situation at Diss is adequately covered by the text in paragraph 6.37 which explains the need for an AAP in view of the complexity of the site in the centre of the historic town and the need to define an appropriate mix of uses of and reconcile access issues.

**Schedule of further minor changes to the Joint Core Strategy for Broadland, Norwich and South Norfolk**

Page no.	Content
Pages 2 – 11	Proposed changes to address references to the Regional Spatial Strategy
Page 12	Proposed changes to address references to the Eco-town
Pages 13 – 14	Proposed changes arising from the Focussed Changes consultation

## Schedule of proposed minor changes to the text to address the references to the Regional Spatial Strategy

Page Number/ Paragraph	Quote	Context	Proposed Change
13/2.8	The JCS has to comply with national and regional planning policies. It must meet the requirements of the Regional Spatial Strategy, known as the East of England Plan (EEP) which sets out the planning matters that need to be dealt with in more detail at the local level, including the number of new homes and jobs to be provided in the area. Between 2008 and 2026, at least 36,740 new homes will be built and about 27,000 new jobs will be created.	Background	Delete and replace with :  The JCS has to comply with national planning policies and demonstrate how required growth can be delivered. The JCS was prepared at a time when legislation required that it be in conformity with the regional "East of England Plan". Following submission of the JCS, the Government revoked the regional plan. However, the JCS is supported by a significant evidence base that demonstrates that it remained valid and its policies do not rely on the East of England Plan. Prior to adoption all unnecessary references to the East of England Plan have been deleted without any need to change the policies or their interpretation.
14 footnote	The Regional Spatial Strategy sets a target of 35,000 new jobs to 2001-2021. In the period up to 2008 a number of new jobs have already been created which means 27,000 new jobs need to be created in the period 2008-2026.)	Job creation	Delete all
14/2.10	A review of the EEP, focussed on housing and employment, is due to be completed by 2011. It will take account of updated household forecasts and look ahead to 2031. It may result in upward pressure on housing targets but at this stage cannot be assessed with certainty. The JCS may require early review to deal with any changes to growth rates specified in the revised EEP.	Impact of RSS Review	Delete all

Page Number/ Paragraph	Quote	Context	Proposed Change
14/2.11	The JCS should not repeat national or regional policies. Users of this strategy will need to refer to Government policy documents and the East of England Plan.	Introduction/back ground to JCS	Delete and replace with: The JCS should not repeat national policies. Users of this strategy will need to refer to Government policy documents.
18/3.20	They are identified in the East of England Plan as 'Key Centres for Development and Change'.	Role of A47 serving Great Yarmouth and Lowestoft	Delete sentence
20/references box	Regional Spatial Strategy: Annual Monitoring Report	Policy background	Retain – evidence remains relevant
21/4.3	The spatial vision acknowledges significant changes to the area in order to meet the ambitious targets for new homes and jobs set out in the East of England Plan (EEP)	Introduction to Vision	Delete and replace with:  The spatial vision acknowledges significant changes to the area required to meet the ambitious targets for the new homes and jobs that the area needs.
22 footnote	The Regional Economic Strategy (sic) sets a target of 35,000 new jobs to 2001-2021. In the period up to 2008 a number of new jobs have already been created which means 27,000 new jobs need to be created in the period 2008-2026.	Note on vision	Delete
26/objective 2	The amount of new housing will be provided in line with the targets set by the East of England Plan.	Housing delivery	Delete
34/references box			Delete reference to EEP
37/5.9	The East of England Plan places particular emphasis on the importance of the historic environment of Norwich, and values the market towns and villages.	Urban form/design	Delete



Page Number/ Paragraph	Quote	Context	Proposed Change
38/references box			Delete reference to EEP
40/references box			Delete reference to EEP
42/5.24	<p>The East of England Plan (EEP) sets out the new dwelling requirement for the whole of the Broadland, Norwich and South Norfolk Area, as well as the requirement for the Norwich Policy Area.</p> <p>The EEP specifically allows for variation between the three districts provided the totals are delivered. In order to meet the obligation set out in PPS 3 to have a 15-year housing land supply at the point of adoption, provision is also made to meet the supply for the period 2021-2026. The amount of housing for which land remains to be allocated is set out in the table below.</p> <p>The JCS promotes slightly more housing than required to ensure EEP targets are met. New allocations in the NPA will total to a minimum of 21,000 dwellings. Outside the NPA new allocations for the majority of individual locations are expressed as a range. To ensure needs are met, subsequent DPDs will make allocations outside the NPA to deliver at least 650 to 1,100 dwellings in Broadland and 1,000 to 1,600 in South Norfolk (the minimum is the requirement rounded up, the higher figure is the top end of the range identified for the locations combined and rounded up). The extent to which delivery of housing is meeting these requirements will be monitored using housing trajectories for the three district area and the NPA (Appendix 6).</p>	Housing delivery	<p>Delete and replace with:</p> <p>The planned level of housing growth is required to address housing need and support the growth potential of the local economy. The Norwich Policy Area (NPA) is a longstanding local planning area used to ensure that growth needs arising from the Norwich urban area are addressed as close to it as possible. The Table on page 43 illustrates the distribution of growth between the NPA and remaining parts of Broadland and South Norfolk. Provision is made for the period up to 2026 to meet the requirement in PPS 3 to have a 15-year housing land supply at the point of adoption. New allocations in the NPA will total to a minimum of 21,000 dwellings. Outside the NPA new allocations for the majority of individual locations are expressed as a range. The extent to which delivery of housing is meeting these requirements will be monitored using housing trajectories for the three district area and the NPA (Appendix 6).</p> <p>Modify Table on Page 43 (see below) to: Delete top part of the table under "Housing requirement" i.e. title row and next 5 rows Delete columns b, c, e, f and g Insert title for new 2<sup>nd</sup> column "Current Commitment 2008"</p>

Page Number/ Paragraph	Quote	Context	Proposed Change
			Delete final row.  Add to References box on page 45 East of England Forecasting Model Spring 2010.

Replacement Table Page 43			
Housing allocations			
District components	Current Commitment 2008	New allocations to 2026	New commitment to 2026
Broadland (NPA)	2,099	9000	11,099
Broadland (outside NPA)	915	690-1,080	1,605-1,995
Norwich	5,592	3,000	8,592
South Norfolk (NPA)	4,156	9,000	13,156
South Norfolk (outside NPA)	1,328	1,040 – 1,580	2,368 - 2,908
Total	14,090	22,730 – 23,660	36,820 – 37,750
Total NPA	11,847	21,000	32,847
Total outside NPA	2,243	1,730 - 2,660	3,973 - 4,903

Page Number/ Paragraph	Quote	Context	Proposed Change
44/5.28	The EEP has a regional target for 35% of all housing to be affordable and recognises higher targets may be required locally.	Housing delivery	Delete
44/5.32	The East of England Plan, adopted in 2008 did not	Travellers and	(covered by Focussed Change)

Page Number/ Paragraph	Quote	Context	Proposed Change
	contain guidance on the scale of provision to be made for Gypsies and Travellers. This has been provided through a partial review completed in 2009.	show people	
45/5.35	The Secretary of State's proposed modifications to the East of England Plan also give general guidance on the need for transit pitches, but on a county basis, and without any guidance on looking beyond 2011	Travellers and show people	(covered by Focussed Change)
45/5.36	Similarly, the East of England Plan review includes a requirement for additional plots for travelling show people, again with a percentage growth assumption after 2011, but without guidance on how it should be applied	Show people	(covered by Focussed Change)
45/references box			Delete reference to EEP
48/references box			Delete reference to EEP
48/5.37	2 <sup>nd</sup> sentence : Research suggests that the local economy has the potential to provide sufficient jobs to support the level of housing growth proposed and exceed EEP targets.	Job creation/ growth	Delete 2 <sup>nd</sup> sentence and replace with : Research suggests that the local economy has the potential to provide sufficient jobs to support the level of housing growth proposed. Indeed jobs growth will be dependent on housing growth.
50/5.46	NATS/NDR. The NDR is recognised in the East of England Plan and through the Regional Funding	Transport	Modify to: Prior to changes in regional planning and

Page Number/ Paragraph	Quote	Context	Proposed Change
	Allocation and is a major scheme in the Local Transport Plan		government funding regimes, the NDR was recognised in the East of England Plan and through the Regional Funding Allocation and achieved "programme entry status". It is a major scheme in the Local Transport Plan.
50/5.48	To comply with the East of England Plan and sustainability objectives of the Joint Core Strategy, public transport will be prioritised, particularly in the urban areas	Transport	Modify to: To comply with sustainability objectives, public transport...'
55/6.1 & 6.2	<p>6.1 The East of England Plan (EEP) focuses growth on Norwich as a Key Centre for Development and Change. It also identifies a wider Norwich Policy Area (NPA) to accommodate growth related to Norwich. The EEP requires lower levels of growth in other towns, Key Service Centres, and other rural settlements.</p> <p>6.2 The policies of the Joint Core Strategy (JCS) confirm the boundaries and overall strategy for the Norwich Policy Area. and distribute growth according to the following settlement hierarchy: ....</p>	Policies for places : Introduction	<p>Delete 6.1 and replace with: Norwich is one of the largest and most important urban centres in the East of England with the potential to contribute significantly to the country's growth and economic development needs. A Norwich Policy Area is defined to provide a focus for planning and co-ordinating Norwich related growth. The Joint Core Strategy area is also characterised by its small towns and villages and this part of the strategy provides guidance to meet their development needs.</p> <p>Delete first part of 6.2 and replace with: The policies of the Joint Core Strategy (JCS) distribute growth according to the following settlement hierarchy:</p>
57/6.4	Norwich is identified by the East of England Plan (EEP) as a Regional Transport Node and the Key	Strategy for Growth in the	Delete all

Page Number/ Paragraph	Quote	Context	Proposed Change
	Centre for Development and Change to accommodate the greatest amount of new development in the area.	Norwich Policy Area	
57/6.5	The EEP requires a minimum of 41,800 dwellings in the Norwich Policy Area (NPA) in the period 2001-2026. By April 2008 around 21,500 dwellings had already been built, permitted or allocated, Therefore new allocations are required to deliver around 20,300 dwellings. To make sure this target is met the Strategy over-allocates slightly by identifying locations for a minimum of 21,000 new dwellings in the NPA. To accord with the requirements of the EEP, the allocations for each location should be considered as a broad minimum to be achieved. Development is focussed within the established urban area and in sustainable locations elsewhere in the Norwich Policy Area including major greenfield developments. Numerous brownfield sites have been developed in recent years and some further opportunities remain. In the short term, brownfield sites provide a significant proportion of land available for development, but this will decline as fewer become available and large greenfield allocations come on stream.	Strategy for Growth in the Norwich Policy Area	<p>To remove references to the RSS and remaining unnecessary duplication with Policy 9, delete all the first part of the paragraph to leave:</p> <p>Development is focussed within the established urban area and in sustainable locations elsewhere in the Norwich Policy Area including major greenfield developments. Numerous brownfield sites have been developed in recent years and some further opportunities remain. In the short term, brownfield sites provide a significant proportion of land available for development, but this will decline as fewer become available and large greenfield allocations come on stream.</p>
59/references box			Delete reference to EEP

Page Number/ Paragraph	Quote	Context	Proposed Change
66/6.12	The East of England Plan requires that most of the growth within the plan will be located in the Norwich Policy Area (NPA), and in particular served by greatly enhanced public transport, walking and cycling.	Locations for major new or expanded communities in the Norwich Policy Area	Delete sentence and replace with:  Most of the growth within the plan will be located in the Norwich Policy Area (NPA) where it can be best served by greatly enhanced public transport, walking and cycling.
68/references box			Delete reference to EEP
72/references box			Delete reference to EEP
75/references box			Delete reference to EEP
78/references box			Delete reference to EEP
82/references box			Delete reference to EEP
96	Regional Spatial Strategy: The East of England Plan (2008)	Appendix 1 relationship to other strategies	Delete reference to the East of England Plan
149	The development plan consists of the Regional Spatial Strategy and locally prepared Development Plan Documents.	Glossary: Development Plan	Delete "the Regional Spatial Strategy and"
149	East of England Development Agency (EEDA) Government agency created in April 1999 to help further economic regeneration and prosperity in eastern England (Norfolk, Suffolk, Cambridgeshire, Hertfordshire, Bedfordshire and Essex).	Glossary : EEDA	Modify to East of England Development Agency (EEDA) Government agency created in April 1999 to help further economic regeneration and prosperity in eastern England (Norfolk, Suffolk, Cambridgeshire,

Page Number/ Paragraph	Quote	Context	Proposed Change
			Hertfordshire, Bedfordshire and Essex). Replaced in 2011 by Local Economic Partnerships.
149	Regional Spatial Strategy for the East of England region. It sets regional policy for the East of England and forms part of the development plan.	Glossary: East of England Plan	Modify to: Was the Regional Spatial Strategy for the East of England region until revoked in July 2010. It set regional policy for the East of England and formed part of the development plan.
150	Glossary definition of Key Centres for Development and Change - Areas specified in the East of England Plan as locations for development and change.	Glossary	Delete all
151	Local transport plans should be consistent with the policies and priorities set out in the Regional Transport Strategy as an integral part of the Regional Spatial Strategy	Glossary explanation of Local Transport Plan	Delete sentence
153	Glossary definition of RSS	Glossary	Delete all
154	Glossary definition of a Structure Plan: The part of the former development plan system which sets out the broad framework for development in Norfolk. The current structure plan prepared by Norfolk county was adopted in October 1999. It will be superseded by the East of England Plan, when adopted, though certain structure plan policies will be 'saved' in the East of England Plan.	Glossary	Delete all

## Schedule of minor changes to the text to address the references to the Eco-town

Paragraph reference/ page no.	Quote	Revision
p.8	In the case of Broadland, the historical pattern of development lends itself to further expansion with new growth locations in the parishes of Old Catton, Sprowston and Thorpe St Andrew, and the development of an eco-community focussing on Rackheath, given its existing employment opportunities and railway line	In the case of Broadland, the historical pattern of development lends itself to further expansion with new growth locations in the parishes of Old Catton, Sprowston and Thorpe St Andrew, and the development of <del>an eco-community</del> <del>low carbon development</del> focussing on Rackheath, given its existing employment opportunities and railway line
p.22	inspired by the exemplar eco-community at Rackheath, zero carbon development will be the standard to be achieved through advances and innovation in the design, construction and management	inspired by the <del>proposed exemplar eco-community</del> development at Rackheath, zero carbon development will be the standard to be achieved through advances and innovation in the design, construction and management
6.6/57	The Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle incorporates land at Rackheath being promoted for an eco-community under the governments Eco-towns programme and development of the rest of the area will be expected to reflect similar high standards.	The Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle incorporates land at Rackheath <del>being</del> promoted for an eco-community under the <del>previous</del> government's Eco-towns programme and development of the rest of the area will be expected to reflect similar high standards.
6.14/p.66	A large part of the development at Rackheath is promoted as an eco-community under the Government's Eco towns programme. The Rackheath eco-community will remain part of this strategy even if the Government programme falters.	A large part of the development at Rackheath <del>is</del> <del>was</del> promoted as an eco-community under the <del>previous</del> Government's Eco towns programme. The Rackheath <del>eco-community will remain</del> <del>low carbon development</del> remains part of this strategy. <del>even if the Government programme falters.</del>
References box/p.68	Planning Policy Statement: Eco-towns – A supplement to Planning Policy Statement	No change
Growth locations chart/p.111	Rackheath Eco Community	Rackheath <del>Eco-Community</del>



## Schedule of minor changes arising from the Focussed Changes consultation

Paragraph reference/ page no.	Quote	Revision
p.62  Policy 10, Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle, 1 <sup>st</sup> sentence	<i>Proposed minor change as submitted March 2010:</i>  Under the heading "Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle" delete the first sentence and replace with: "This strategic allocation will deliver an urban extension extending on both sides of the Northern Distributor Road, within the area shown in appendix 5."	Withdraw this proposed minor change. Text to remain as in submitted JCS
p.66  Paragraph 6.14	<i>Proposed minor change as submitted March 2010:</i>  Line 1: Replace "The major urban extension in the Old Catton," with "The major urban extension within the Old Catton,"  Lines 8-10 Delete whole sentence starting " An Area Action plan" and replace with "A Supplementary Planning Document setting out a delivery framework identifying areas of growth and relating delivery of growth to key elements of infrastructure will be prepared."	Withdraw this proposed minor change. Text to remain as in submitted JCS
Paragraph reference/ page no.	Proposed Change	Justification
Statement of Focussed Changes, p. 3 FC3, paragraph 5.28B	Line 3: in the second sentence replace "The policy target of 40% affordable housing..." with "The policy target for affordable housing..."	For consistency with the proposed policy taking into account the graduated target on small sites

Paragraph reference/ page no.	Proposed Change	Justification
Statement of Focussed Changes, p. 3 FC3, paragraph 5.28B	Line 6: in the second sentence replace "...the expectation of the Government's basic needs assessment model..." with "...the expectation within the Government's guidance..."	Correction of wording