

Report for Resolution

Report to Council
29 September 2009

Report of Director of Regeneration and Development

Subject Joint Core Strategy for Broadland, Norwich and South Norfolk

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Purpose

This report to Council recommends that having considered all the evidence, and taking account of the recommendations of the Greater Norwich Development Partnership Policy Group Council approve the Joint Core Strategy covering the Local Planning Authority areas of Broadland, Norwich and South Norfolk and publish it for public representations on 'soundness' under the relevant plan-making procedures.

Recommendations

1. to approve the pre-submission version of the Joint Core Strategy for Broadland, Norwich and South Norfolk and publish as it, together with all supporting evidence, for the statutory minimum period of six weeks under Regulation 27 of the Town and County Planning (Local Development) Regulations 2004 as amended, to invite representations on 'soundness';
2. to delegate authority to the Director of Regeneration and Development (in consultation with GNDP directors of partner councils), the GNDP Manager, and the Portfolio Holder for Sustainable City Development (in consultation with portfolio holders of partner councils) to make further minor changes prior to publication to reflect emerging evidence and any necessary corrections;
3. to consider at a future meeting of Council a report on the outcome of representations on soundness, progress on the deliverability of the Northern Distributor Route, and further recommendations of the Greater Norwich Development Partnership Policy Group before making a decision on submitting the Joint Core Strategy to the Secretary of State.

Financial Consequences

The financial consequences of this report are set out in paragraph 7.1 of the accompanying report to the Greater Norwich Development Partnership (Appendix 1 herewith) which states:

"Costs of 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 summer 2010 will have costs associated with the Inspector(s) and support at the inquiry". There are no additional financial

consequences for the City Council. If changes need to be made to the Joint Core Strategy to respond to representations on soundness there may be additional financial costs associated with further public consultations. These costs will need to be assessed should this requirement arise.

Risk Assessment

The risks associated with this report are set out in section 5 of the accompanying report to the Greater Norwich Development Partnership (Appendix 1 herewith). The main risk with any major spatial planning policy document like this is that it will be, or risks being found 'unsound' at the independent public examination. The nature of representations on soundness will enable the GNDP to assess whether it is necessary to revise the strategy and carry out further public consultation before it is submitted to Secretary of State. Such a course of action would place additional time and cost burdens on the council but their scope cannot be determined until the next stage of consultation has been completed. However, if it is judged they are necessary, it would be preferable for the GNDP to manage these changes directly than for the strategy to be found unsound at the subsequent public examination stage in the process. As indicated above addressing matters of unsoundness in the strategy would probably involve substantial additional delay and associated cost to revise the document, and repeat key stages of the plan-making process.

As part of the on-going self-assessment of soundness, and as part of the project management of the Joint Core Strategy process the GNDP has identified a number of issues that are potential risks to soundness. For some these, there are measures in place which aim to manage the risks. Section 5 of the report in Appendix 1 describes these in more detail alongside the measures taken to mitigate these risks.

The main issues and potential risks identified are concerned with proposals for the distribution of major growth which is more dispersed in South Norfolk, and the infrastructure required to support the level of growth in the area overall. The Joint Core Strategy relies on a number of major infrastructure projects, including the Northern Distributor Route. As these are viewed as fundamental, and critical, to the delivery of the strategy no alternative scenarios have been developed to deal with the possibility that they might not be delivered as planned, or at all. The lack of such an alternative strategy could give rise to challenges to soundness. For the NDR scheme in particular, the government expects to make a decision on programme entry by the end of 2009. At the time of writing this report it is not possible therefore to be clearer about the extent to which this particular risk will be resolved.

The above issues have been considered at meetings of the Local Development Framework working party on the 24 August 2009 and a member briefing on 22 September 2009. All members of the Council were invited to these meetings.

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”.

Executive Member: Councillor Morrey - Sustainable City Development

Ward: All

Contact Officers

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Background Documents

Joint Core Strategy pre-submission version (September 2009)

There is a significant evidence base underpinning the preparation of the Joint Core Strategy. It is comprehensively listed in appendix 2 of the accompanying report of to the GNDP policy group (Appendix 1 herewith)

Planning policy statement 12: Local spatial planning, 2008. Communities and Local Government

Town and County Planning (Local Development) Regulations 2004 as amended

Report

Background

1. Norwich has been identified as a main focus for growth in the East of England, for new homes and jobs, leisure, cultural and educational development. The economic, social and cultural influence of the city extends well beyond its administrative boundaries into the neighbouring districts of Broadland and South Norfolk as well as further afield.
2. The councils of Broadland, Norwich and South Norfolk, supported by Norfolk County Council have prepared a single plan covering the entire area up to 2026. The plan provides the strategy to guide, manage and deliver the growth deemed necessary for the area by central and regional government. For Norwich this is especially important to help addressing the significant concentrations of deprivation; develop the knowledge economy; ensure new development is more sustainable; and provide the strategic policy to support the council's priorities for regeneration.

3. The 'grand challenges' that the strategy has to address are:

Environment Enhancing our special environment and mitigating against any adverse impacts of growth;

Homes identifying land to meet the requirements of providing 37,000 additional homes;

Jobs securing another 27,000 new jobs of all types and levels in all sectors of the economy and for all the workforce;

Place making maximising the high quality of life we currently enjoy and respecting the patterns of living which characterise the area; and

Infrastructure ensure that essential infrastructure, services and community facilities are provided.

4. When it is adopted it will provide the main strategic planning policies for the city and the wider greater Norwich area. Upon adoption some of these policies will immediately apply to planning decisions, while others will provide the basis for more detailed plans and policies to come forward. It is part of the plan-making system called the local development framework (LDF). The LDF for Norwich is part of the Council's policy framework and has an importance alongside the corporate plan, and the sustainable community strategy, for example.
5. A substantial evidence base has been gathered to help support and justify the emerging strategy. But the strategy also needs to be informed by effective public participation, and it has to show that it is an effective strategy that can be delivered. Briefings have been organised for members about the evidence studies, and explain the implications.

6. There has been substantial public engagement in the plan-making process, involving full public consultation, consultation with technical bodies, and specialist stakeholder workshops. There has also been extensive engagement with local and strategic partnerships and with local councillors. Through this, Members have been able to give early and informed advice and direction on the development of the Joint Core Strategy. Detailed councillor engagement has been through the Local Development Framework Working Party which has considered the emerging documents to inform executive decisions about progressing the strategy to the next stage.
7. In the closing stages of the plan's preparation (Spring 2009), members from local strategic partnerships together with councillors from the GNDP councils have met several times to consider work in progress and provide advice and direction to officers. In particular, new policies have been developed on sustainability and climate change, design, energy, and refining policies for growth in smaller places outside Norwich.
8. It is important to highlight the role of local and county strategic partnerships in this plan-making process. Because of the way in which sustainable community strategies are linked with the local development framework, it is essential that partnerships have had an ample opportunity to contribute to its development. Each partnership, including the City of Norwich Partnership, is more than a consultee: they have helped to drive and direct the joint core strategy and have shared ownership of it.

Report to the Greater Norwich Development Partnership Policy Group

9. Attached to this report to Council is **Appendix 1**: a report the GNDP policy group meeting on 24 September 2009. That GNDP report describes the main issues that members need to consider to inform their decision on the recommendation. This involves taking full account of:
 - The consultations: what people told us and how we were able to respond;
 - All of the evidence;
 - The issues and risks; and
 - The Sustainability Appraisal Report.
10. This report to Council does not duplicate information in the GNDP report, and members are asked to consider the main conclusions of the report including the risk assessment.

Conclusion

11. This is an important stage in bringing forward the Joint Core Strategy. Different stages of public consultation have been completed, and the pre-submission version of the document represents the agreed choices of the GNDP councils.
12. The GNDP has no executive decision-making powers and the decision to approve it for publication must be taken by each constituent council. Upon the

eventual adoption, the Joint Core Strategy will be part of the council's Policy Framework. This function is not delegated to Executive and can only be taken by full Council. All councillors have had the opportunity for a full explanation and briefing on the Joint Core Strategy document prior to this report being considered by Council.

Joint Core Strategy **Pre-Submission publication**

Summary

This report seeks member approval to recommend constituent authorities to publish the Joint Core Strategy prior to submission.

Publication and submission are the last stages of document production and represent the final opportunity for the GNDP Policy Group and the District Councils to review the document before it is considered at an Examination in Public by a government Inspector.

The Joint Core Strategy must be justified and effective. This report lists the Evidence Studies that have contributed to the preparation of the Joint Core Strategy. Members must take this evidence into account when reaching a decision.

If the constituent authorities approve the Joint Core Strategy it will be published for a period of at least 6 weeks in paper and on-line to allow representations on soundness (Regulations 27 and 28). A decision on submission will follow this period.

1. Introduction

- 1.1. Attached to this report is the proposed “pre submission” version of the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk. Evidence to be considered in reaching a decision to agree to recommend this version of the JCS to constituent authorities is attached, is available at GNDP and Council offices, or will be available at your meeting.
- 1.2. A number of relatively minor changes to the document are needed to reflect emerging evidence. A list of proposed changes will be laid on the table at the meeting.
- 1.3. The Pre-Submission version is the document that the Local Planning Authorities intend to submit for public examination in front of independent Planning Inspectors. However, before submission can take place the JCS has to be published, alongside all the supporting evidence on which it relies, for a 6 week period to allow the public and any interested bodies to make representations. These representations must challenge the “soundness” of the strategy but may not seek to modify its content unless as a consequence of claimed unsoundness. The GNDP authorities will then consider any

representations made before making the decision to submit. If material changes are required at this future stage then submission can not take place without a further round of public consultation.

2. **Background**

2.1. The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was the subject of an Issues and Options consultation in the winter of 2007/8. This was followed by a targeted technical consultation on draft policies commencing in August 2008 with key results and evidence considered by Members in December 2008. Following an informal review by a Planning Inspector, Members agreed on a favoured growth option to be the subject of full public consultation between March and June 2009. Due to the short timescales involved, the March 2009 public consultation reflected the favoured growth option but had not been revised in response to other issues raised during the 2008 technical consultation. Members had also agreed in December 2008 to the consideration of all consultation responses together. A summary of the consultation process is appended – Appendix 1.

2.2. The consultation stages have been documented, and members need to have regard to the outcome of consultation in reaching their conclusion on publication of the JCS. A consultation report on the Issues and Options stage has previously been reported to Members and is available on the GNDP website. The relevant documents for each of the Technical and Public stages are:

A transcript of the representations entered into the database under each question (307 pages technical, 1156 pages in nine volumes public).

The full report (722 pages technical, 1307 pages of public) of representations detailing –

- Reference number
- Representor
- Summary of representation
- For each group of representations making similar points
 - Response of officers
 - Action (recommendation for incorporation into strategy)

A summary report (105 pages technical, in preparation at time of writing public) detailing

- Reference number
- Representor
- Action
- Consequential change to the strategy

While these reports overlap, given the nature of the reports from the database, this has been found the most efficient way to enable members to see how the results of the consultation exercises have fed through to the Strategy.

In addition, a high level summary of the consultation exercises (300 pages) has been prepared, covering both stages. For each it lists

- The methodology
- The headline issues raised
- The officer responses to the headlines
- Appendices detail consultation process, events, invitees etc at each stage

Finally, for each of the local planning authorities, there is a brief statement of compliance with the respective Statement of Community Involvement.

- 2.3. The scale of the consultation undertaken and the size of the response means that the above documents are extremely lengthy and for that reason have not been appended to this report. All are available for inspection in either electronic or paper form, at the offices of the GNDP, County Council, or local planning authorities.
- 2.4. The JCS has since been revised in response to all issues raised by the technical and public consultation, GNDP Policy Group and each of the relevant Local Development Framework steering groups.
- 2.5. In addition the document has been edited to:
 - include maps and diagrams to support the text
 - take account of recent emerging evidence, in particular the Greater Norwich Infrastructure Needs and Funding Study, the Water Cycle Study 2b and the Appropriate Assessment
 - address internal comments, and comments from external advisors
 - include completed Appendices.
- 2.6. As a result of Policy Group requirements, the JCS includes a clearer scene setting Introduction, and objectives and policies have been re-ordered to place an increased emphasis on climate change, the environment, good design, energy conservation, and the protection of local distinctiveness. These policies have been significantly revised since public consultation. They are followed by further area-wide policies for housing delivery, the economy, access and transportation, culture and support for communities and enhancements to the local quality of life.
- 2.7. These generic policies are followed by the specific policies relating to places. A particular change since the public consultation version has involved the review of the settlement hierarchy. This has resulted in an increase from 28 to 58 Service Villages for small scale housing allocations and employment development, and the definition of 39 villages suitable for infill development.
- 2.8. The final policy, Policy 20 dealing with Implementation has also been revised to reflect the latest evidence and the emerging introduction of a Community Infrastructure Levy (CIL). This policy is supported by an Implementation Framework (in the JCS appendices) outlining the specific infrastructure required to facilitate the development promoted by the JCS. The Strategy is

also supported by a monitoring framework – satisfying one of the “tests of soundness”. Other appendices have also been newly produced or revised.

3. **Tests of Soundness**

3.1. Planning Policy Statement 12 ‘Local Spatial Planning’ (2008) requires three principal tests of soundness. Core Strategies must be **justified, effective and consistent with national policy**.

3.2. To be **justified** the JCS must be:

- founded on a robust and credible evidence base. This should include both evidence of participation and research/fact finding
- the most appropriate strategy when considered against the reasonable alternatives. The Sustainability Appraisal should play a key role in providing sound evidence and should provide a powerful means of proving to decision makers and the public that the plan is the most appropriate given reasonable alternatives.

3.3. Details of the evidence base, including consultation and engagement are appended to this report. The evidence is extensive and considered to be both robust and credible. Topic Papers will explain how the evidence has informed policy development.

3.4. To be **effective**, the Core Strategy must be:

- deliverable, being based on sound infrastructure delivery planning, ensuring partners are signed up and ensuring there are no environmental or other barriers
- flexible, to include contingencies to deal with changing circumstances and the need to plan over the long period (15 years or more)
- able to be monitored.

3.5. The development of the Strategy has been supported by a soundness self-assessment in accordance with guidance from the government’s Planning Advisory Service (PAS) and advice from the Planning Inspectorate (PINS). The outcome from this self-assessment is appended.

3.6. The JCS is considered to be consistent with national policy. Issues raised by the Government Office during consultation have been addressed and GO-East are represented on the GNDP Policy Group.

3.7. The Strategy must also be in general conformity with the East of England Plan. The JCS delivers all the key elements of the EEP, issues raised during consultation have been addressed, and it is expected that the JCS will be found to be “in conformity”.

4. **Recent Evidence**

4.1. A number of evidence studies have recently been completed or updated. Summaries are appended of the latest findings of the Sustainability Appraisal, Appropriate Assessment, Water Cycle Study Stage 2b, strategic traffic

modelling and the Infrastructure Need and Funding Study. List of Evidence Studies appended – Appendix 2.

- 4.2. The Sustainability Appraisal has been updated to assess the proposed JCS and has been subject to verification by consultants.
- 4.3. In addition to Sustainability Appraisal the JCS requires a Habitats Regulation Assessment (also known as Appropriate Assessment or AA). The Assessment is required to meet the obligations of Articles 6(3) and 6(4) of the European Habitats Directive in order to ascertain whether the strategy will have a significant effect on designated European sites. Sites assessed are Special Protection Areas (SPAs), Special Conservation Areas (SACs), and Ramsar sites. The Appropriate Assessment process has informed the development of the policies of the JCS.
- 4.4. The JCS area contains the Wensum and some smaller international sites and abuts or is close to extensive areas of internationally protected habitat including in the Broads, the Brecks, the North Norfolk Coast and the Suffolk Coasts and Heaths. The likely significant effects on European Habitats arising from the proposed strategy and policies arise from the direct impact of new built development such as disturbance and water resources, and indirect impacts from increased recreational/tourism pressures. The JCS has been amended to ensure that appropriate mitigation measures are incorporated throughout the document where necessary.
- 4.5. The AA has been undertaken by consultants and largely completed. However, at the time of writing, the findings have not been agreed by Natural England.
- 4.6. The Water Cycle Study stage 2b has recently been completed. The Study shows that sufficient water resources will be available to meet the proposed increase in water demand resulting from growth proposed in the JCS. Promotion of water efficiency through the JCS, increased metering and providing new strategic water resources will be required. The Study also shows that, with some upgrades, all increases in wastewater can be treated at existing works. However, based on current evidence, the study suggests the works required to protect water quality and to build new strategic sewers will require late phasing of significant elements of the development strategy. Water quality issues relate to Long Stratton, Aylsham, Acle, Loddon and Reepham and strategic sewer issues relate to Norwich, Hethersett, Cringleford, Easton and the area north-west of Norwich. The best means to overcome these constraints is being investigated with Anglian Water. Early advice suggests that it is likely to be possible to be more flexible in relation to phasing of development than currently indicated in the Study.
- 4.7. Strategic traffic modelling has been undertaken of the JCS proposals. These include the transport interventions proposed in the JCS and being developed through the Norwich Area Transportation Strategy (NATS) implementation plan, such as Bus Rapid Transit. The modelling confirms that, in overall terms, the proposals emerging in the NATS implementation plan manages the increased travel demand from the planned growth. It demonstrates that the NDR achieves its objectives and allows the other NATS interventions to be

implemented.

- 4.8. The Infrastructure Need and Funding Study (2009) identifies and costs the capital infrastructure required to support the proposed growth, advises on the role of developer contributions, and reviews potential delivery options. It identifies a potential funding gap of just over £320m which can be closed based on a best case scenario of costs and if development land costs are low (and consequently developer contributions can be high). It also advises on more formal arrangements to manage delivery and implementation.

5. **Risks**

- 5.1. There will be risks associated with any strategy and there is a balance to be struck between timely production of a plan and continuing collection and refinement of evidence including further rounds of public consultation. This Strategy has risks around the tests of soundness relating to the evidence base, the consideration of reasonable alternatives, deliverability and flexibility. The existence of a risk does not automatically imply the JCS will be found unsound. Rather it highlights issues that need to be managed. A definitive conclusion on soundness will not be reached until the Inspectors' report on the Public Examination process. Members' attention is drawn to the currently identified risks, together with an explanation of how they are being addressed.
- 5.2. A key question remains around infrastructure delivery and the efficiency of the scale and distribution of major development compared to reasonable alternatives. There are some areas where the precise pattern of future service delivery is unknown because further detailed work needs to be undertaken and the timetable for funding is not in alignment with the preparation of the JCS. The JCS does, however, provide for the introduction of a Community Infrastructure Levy and encourages innovative solutions for service provision.
- 5.3. The JCS includes limited flexibility to deal with contingencies. However it does provide some flexibility for major housing growth by expressing housing allocations as minima. Having a number of strategic growth locations around 1,000 dwellings also provides some flexibility in the timescale for their planning, design and delivery. In terms of major infrastructure projects, these are fundamental to the JCS so no alternative scenarios are proposed.
- 5.4. Delivery of the JCS is dependent on a wide range of infrastructure including some large projects such as the NDR, the Long Stratton bypass and southern bypass junction improvements. The NDR is particularly critical as the strategy for growth and transport within the JCS can not be delivered without it. A decision on programme entry is being discussed with the Department for Transport. In the absence of a positive decision on programme entry, submission of the JCS would not be advisable. The position will be considered following pre-submission consultation.
- 5.5. The Water Cycle Study 2b raises some potential concerns about the timing of delivery. This could effect both strategic development locations and smaller scale development in more rural areas, and cumulatively would undermine the ability to deliver housing trajectories. However, it is anticipated that these issues can be overcome and a mechanism put in place to bring forward the

necessary improvements to ensure no delay to housing delivery.

- 5.6. There is limited evidence to support the potential scale of development required in villages in the South Norfolk NPA to deliver the smaller sites allowance. This will have to be resolved at the site specific stage.
- 5.7. The revised settlement hierarchy has not been subject to public consultation and it.
- 5.8. A number of policies have been significantly revised or are new and have not been the subject of public consultation. These include policies on the settlement hierarchy (including several villages newly identified for housing allocations) and policies covering design, energy and water which may be challenging for development. However, these have been developed in direct response to new evidence or previous consultation.
- 5.9. At the time of writing, the Appropriate Assessment has not been agreed with Natural England. Discussions are taking place at the time of writing to resolve any outstanding concerns. It would be inadvisable to proceed to pre-submission consultation without a clear understanding of the position.
- 5.10. It is proposed to keep the risks under review and manage them by providing further explanation through a series of Topic Papers to accompany JCS publication. These will amplify the evidence and describe the local circumstances that shaped strategic choices.

6. **Next Steps**

6.1. Following the recommendation of the Policy Group:

1. the constituent authorities will need to agree the 'pre-submission' version of the JCS for publication.
2. the Joint Core Strategy, and all supporting evidence, will be published for the statutory minimum period of 6 weeks. Representations can only be made on "soundness".
3. the GNDP Policy Group will consider progress on the NDR achieving programme entry status and representations made on soundness, and agree next steps which will be:

a). on the basis that the JCS is still considered to be sound, recommend constituent authorities to submit to Secretary of State. This will enable the current timetable to be followed.

or

b. the constituent authorities accept that there is a clear possibility that the document if submitted would be found 'unsound' and revision is therefore necessary. This would delay the process by a minimum of 6 months

7. **Resource Implications**

- 7.1. **Finance** Costs of 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 summer 2010 will have costs associated with the Inspector(s) and support at the inquiry
- 7.2. **Staff** : The JCS is being developed with existing staffing resources in the four authorities and the GNDP.
- 7.3. **Property** : Some of the authorities' land holdings could be affected by the JCS but this is not a matter that should influence planning decisions.
- 7.4. **Section 40, Natural Environment & Rural Communities Act 2006:** The JCS has to deliver significant growth within an environmentally sensitive context. The implications for the local environment are addressed in the Strategy and through the evidence base including the Sustainability Appraisal and Appropriate Assessment.
- 7.5. **Legal Implications** : This report has no direct legal implications. The Regulations which accompany the preparation of a Development Plan Document are to be adhered to. Failure to consider the Regulations and proceed in accordance with them could result in either the document being found unsound or Judicial Review
- 7.6. **Human Rights** : None
- 7.7. **Equality Impact Assessment (EqIA)** :) The JCS addresses the needs of a number of vulnerable groups in the area including specifically Gypsies and Travellers, the young, the elderly and the low income / long-term unemployed. An Equalities Impact Assessment has been completed to accompany this report – Appendix 3
- 7.8. **Section 17 – Crime and Disorder Act** As a high level strategy the JCS has limited direct impact on crime and disorder. The JCS includes a number of policies that will help to address crime and disorder issues including those relating to design, community development and infrastructure. These will be expanded in subsidiary local development documents

7.9.

8. **Alternative Options**

- 8.1. Members could make significant changes to the draft JCS. Any material changes would delay the process as they would need to be subject to further assessment and, potentially, consultation.

9. **Conclusion**

- 9.1. While there are some outstanding risks, the draft JCS is considered to reflect, as far as possible, members views, consultation responses and the evidence base. The JCS is considered to be appropriate for submission, subject to confirmation of programme entry for the NDR.

Recommendation

- (i) Having considered all the evidence, Members are asked to recommend to the constituent authorities the Joint Core Strategy for pre-submission publication.
- (ii) Seek delegated authority to the GNDP Directors, the GNDP Manager and portfolio holders to make further minor changes prior to publication to reflect emerging evidence and any necessary corrections

Officer Contact

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

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Appendix 1

Public Consultation

1. Introduction

1.1 Broadland, Norwich and South Norfolk are working with Norfolk County Council as the Greater Norwich Development Partnership (GNDP) to develop a Joint Core Strategy for housing growth and jobs in the area.

1.2 Summary of consultation:

Date	Activity	Results
Summer 2007	A series of stakeholder workshops were held that centred on a set of topic papers	Documents compiled for first round of public consultation
November 2007	The first full-scale public consultation was held on Issues and Options	The results of this consultation were published in the <i>Issues and Options: Report of Consultation 20 May 2008 – Report presented to Members 24 June 2008</i>
August 2008	A Reg 25: Technical Consultation was held with ‘specific bodies’ (statutory agencies, service providers, organisations that deliver infrastructure and other key stakeholders, including faith councils). The consultees were asked to consider three options for the distribution of major growth in and around Norwich, and draft policies covering the rest of the plan’s subject matter.	Evidence and information was presented to Councillors from the four GNDP councils, who agreed to publish a draft joint core strategy for full public consultation. The results of this consultation were published in the <i>Regulation 25 Consultation: Evidence Report-12 December 2008. Report presented to members 18 Dec 2009</i>
March 2009	A Reg 25: Public Consultation was held on a single favoured option for growth, the draft policies and the draft Sustainability Appraisal. The bodies who had engaged in the earlier technical consultation were asked to consider any changes resulting from adopting the favoured option for the Norwich Policy Area.	Following a review of the responses, the consultation period was extended to mid June. A full report on the results of the Technical and Public Consultation were published in the <i>Technical and Public Consultation Report August 2009 – Copy supplied as part of the submission papers</i>

1.3 Public consultation on “Issues and Options” took place in winter 2007/ 2008. The results of this consultation were published in the *Issues and Options: Report of Consultation 2008*. Following the public consultation and changes to planning

procedures¹, the GNDP undertook a technical consultation with “specific bodies” (statutory agencies, service providers, organisations that deliver infrastructure and other key stakeholders, including faith councils) during August / September 2008.

- 1.4 Technical consultees were asked to consider three options for the distribution of major growth in and around Norwich, and draft policies covering the rest of the plan’s subject matter. Evidence and information was presented to Councillors from the four GNDP councils, who agreed to publish a draft joint core strategy for full public consultation.
- 1.5 A single favoured option for accommodating major growth in the Norwich Policy Area was put forward by the GNDP which included large scale housing in and around Norwich and on major sites in Broadland and South Norfolk. The GNDP undertook a public consultation from 2nd March to 24 April 2009 to gauge reaction and comment to this proposed favoured option for growth, the other draft policies and the draft Sustainability Appraisal. Following a review of the response, the consultation period was extended to Friday 12 June 2009.
- 1.6 The public were encouraged to take part in the consultation via an intensive publicity campaign with adverts in the local papers, council magazines and posters in public places. 38 public exhibitions took place across the whole area and the GNDP wrote to 2000 parish councils, community organisations and local organisations. Over 7000 letters to other people who took part in previous consultations were also distributed.
- 1.7 In addition the bodies who had engaged in the earlier technical consultation were asked to consider any changes resulting from adopting the favoured option for the Norwich Policy Area. This group were only asked to respond to a subset of questions (Q10 – Q13) due to their previous involvement in the consultation process with the caveat that they could respond to the full set of questions if they wished.
- 1.8 This report details the range of methods and the results of the consultation that will inform the joint core strategy submission.

¹ Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008

2.Consultation methods used

2.1 Regulation 25: Technical Consultation

In August 2008 an eight week 'technical consultation' took place. The Partnership wrote to statutory agencies, service providers, organisations that deliver infrastructure, and other key stakeholders and asked them for guidance to develop the 'content' of the strategy.

The consultees were sent the Technical Consultation: Regulation 25 document and a questions booklet. Documents were also made available on the GNDP website.

A leaflet was also sent to all householders and businesses in the three districts to update them on the joint core strategy process.

A series of dialogues had been held with developers and interested parties in the run up to the consultation, including a forum held on 4 July 2008.

2.2 Regulation 25: Public consultation

In March 2009 an eight week public consultation was launched. Towards the end of the consultation period the GNDP reviewed the number of representations received and decided to extend the consultation period to 12 June 2009 to ensure that consultees had adequate time to respond to the consultation.

A number of methods were used to advertise the consultation:

- A full page advert, detailing locations of exhibitions in the Eastern Daily Press, Great Yarmouth Mercury, Beccles and Bungay Journal, North Norfolk News, Evening News, Diss Express, Wymondham and Attleborough Mercury in week one of the consultation.
- A full page advert, detailing locations of exhibitions in the Eastern Daily Press, Evening News in week commencing 9 March and 30 March and again in the Eastern Daily Press, Great Yarmouth Mercury, Beccles and Bungay Journal, North Norfolk News, Evening News, Diss Express, Wymondham and Attleborough Mercury in week one of the consultation in week commencing 13 April 2009.
- A banner advertising the consultation on www.edp24.co.uk throughout the consultation period.
- Notices on the local authority websites and the GNDP website.
- Articles in council newsletters.
- An advert in Norwich City Council's Citizen magazine

A letter of notification of the consultation was sent to all respondents to previous consultations and those who had expressed an interest in the process

Technical consultees received a separate letter enclosing an extract of Policy 5 (the favoured option) as this was the only section to have changed since the previous consultation . A briefing session was also held for developers and other interested parties on 20 March 2009.

Parish councils received the full document and a questions booklet to enable them to respond to the consultation.

The consultation documents were made available on the GNDP website and were also made available for reading at all Council Information Centres in the GNDP area.

The report was also made available at exhibitions (see below) and was sent to anyone requesting it.

In extending the consultation the Partnership wrote to all those who had responded to, or expressed an interest in, previous consultations, the current consultations. The Partnership also advertised the extension in the Eastern Daily Press and Evening News and in the GNDP Newsletter and website.

2.3 Regulation 25: Public consultation – Exhibitions

38 public exhibitions were held between 14 March 2009 and 18 April 2009 in a number of locations in the GNDP area. These were held throughout the week and at weekends throughout the area at locations such as The Forum in central Norwich, community halls, shopping malls and market stalls. Permanent exhibitions were displayed in the district and county council offices. Officers from the GNDP authorities staffed the exhibitions and were available to help with enquiries and answering questions.

In summary a total of 1547 people were recorded as having attended exhibitions (although this probably underestimates actual attendance at busy times).

The exhibition displays were also available for viewing on the GNDP website.

2.4 Hard to reach groups

Hard to reach groups identified by the authorities were written to by the Partnership at the start of the consultation period and at three weeks before the end of the consultation period. These organisations were sent materials including a leaflet of the exhibition and a poster of exhibition dates.

Community groups and residents associations were written to asking them to raise awareness of the consultation and schools in the GNDP area were written to and offered a workshop with officers to enable young people to participate in the consultation.

2.5 Meetings held with, and presentations to, various stakeholders

A number of presentations were given to inform stakeholders about the consultation and to enable officers to answer any questions.

These included:

- Joint Local Strategic Partnerships (Broadland Community Partnership, City of Norwich Partnership, South Norfolk Alliance, County Strategic Partnership)
- GNDP Private Sector Forum
- Norwich Forum for the Construction Industry

There were also a number of meetings with stakeholders including:

- Landowners and agents representing interests in NE Norwich
- Rail providers
- Norfolk NHS

2.6 Other consultation activities

The individual authorities also carried out other activities as part of the regulation 25 consultation. Norwich City Council's Community Engagement officers were present at consultation events and asked residents a series of questions about growth in the city.

The city council also undertook a consultation with the Norwich Third Sector Forum on 9 April 2009.

Broadland District Council undertook a site-specifics consultation in conjunction with the Regulation 25 public consultation.

Appendix 2

JCS Evidence Base

The significant evidence base underpinning the LDF is outlined below:

Research and studies:

- A47 Southern Bypass Junctions Capacity Assessment Report (Mott Macdonald, 2008)
- An Economic Assessment of Greater Norwich: A companion document to the Greater Norwich Economic Strategy 2009 – 2014 (GNDP, 2009)
- Appropriate Assessment of the Joint Core Strategy for Broadland, Norwich and South Norfolk (Mott Macdonald, 2009)
- Feasibility Study for a Conference Centre and Concert Hall for the Greater Norwich Area (Tourism UK, 2008)
- Greater Norwich Development Partnership Green Infrastructure Delivery Plan (GNDP, 2009)
- Greater Norwich Development Partnership Historic Landscape and Character Assessment (Norfolk County Council, 2009)
- Greater Norwich Employment Growth and Employment Sites and Premises Study (ARUP, 2008)
- Greater Norwich Housing Market Assessment (Greater Norwich Housing Partnership, 2007)
- Greater Norwich Infrastructure Need and Funding Study (EDAW/AECOM, 2009)
- Greater Norwich Integrated Water Cycle Study – stages 1, 2a and 2b (Scott Wilson, 2009)
- Greater Norwich Joint Core Strategy Public Transport Requirements of Growth (Mott Macdonald, 2008)
- Greater Norwich Retail and Town Centres Study (GVA Grimley, 2007)
- Green Infrastructure Study (Chris Blandford Associates, 2008)
- NATS Plus Implementation Plan: Strategic Modelling of Joint Core Strategy

(Mott Macdonald, 2009)

- Norwich Growth Area Infrastructure Needs and Funding Study (EDAW, 2007)
- Pre-submission JCS Sustainability Appraisal Report (Scott Wilson, 2009)
- Strategic Flood Risk Assessment (Millard Consulting, 2007)
- Strategic Housing Land Availability Assessment (Nathaniel Lichfield & Partners, 2009)
- Sustainability Appraisal Scoping Report (Scott Wilson, 2007)
- Sustainable Energy Study for the Joint Core Strategy for Broadland, Norwich and South Norfolk (ESD, 2009)

Topic Papers

- City Centre
- Economy
- Environment
- Housing
- Implementation Governance
- Locations for Major Growth
- Settlement Hierarchy
- Transport

Stages in JCS development

- Issues and Options consultation (December 2007 – February 2008)
- Issues and Options : Report of consultation (July 2008)
- Technical Reg 25 consultation (August - September 2008)
- Technical Reg 25 : Report of consultation (Dec 2008)
- Public Reg 25 consultation (March – June 2009)
- Regulation 30 statements

Diversity Impact Assessment for the Joint Core Strategy for Broadland, Norwich and South Norfolk

Introduction

Broadland District Council, Norwich City Council and South Norfolk Council are committed to carrying out Diversity Impact Assessments as a means of integrating diversity objectives within the mainstream activities of the three Councils.

The Joint Core Strategy sets the spatial planning framework to deliver regeneration, development and growth within the three districts. It will deliver the spatial elements of the Sustainable Community Strategies for the three districts. The overarching aim of the strategy is to build sustainable communities with the key elements including:

- The opportunity to play an active part in community life and be involved in decision making
- Healthier and safer places and a high quality environment
- Access to suitable housing, jobs, facilities and services
- Opportunities for people to learn at all stages of life
- The right transport infrastructure so people can travel using varied forms of transport

An initial assessment has been carried out to identify any potential impacts that the Joint Core Strategy may have across the six strands of the diversity agenda.

Test of Relevance

The first step of the Diversity Impact Assessment is to provide an indication on whether the function has a 'high', 'medium' or 'low' impact against the diversity criteria. This is called the test of relevance. Appendix A contains the full results of the test of relevance.

In summary the findings suggest that the plan may have a medium relevance on two strands. These are race and age. With regards to race, this is due to the strategy providing for permanent and transit Gypsy and Traveller sites that will reduce the problems associated with unauthorised sites and may tackle a number of problems faced by these communities, particularly relating to low educational achievements and poor health. It will also assist community cohesion by providing properly serviced sites that will not give rise to the problems often experienced by the settled community associated with unauthorised sites. However it has been identified that community cohesion may be an issue in locations where new Gypsy and Traveller sites are proposed. Opportunities will be sought to foster trust between the settled and travelling community and reduce suspicion and people's negative perception of Gypsy and Travellers which is often a result of problems associated with unauthorised sites. The Gypsy and Travellers will also be encouraged to use mainstream education and health services which will aid integration particularly among the younger generation.

In relation to age, the strategy provides for housing of different scales across a range of settlements. The housing will be of appropriate mix of sizes, types and tenures which will be suitable for people of different ages. The affordability of housing is of concern to many young people and as such the increased provision of affordable housing will help those in housing need. Furthermore an increase in jobs (particularly higher value, knowledge

economy jobs) in the area will help retain younger people in the Norfolk area rather than them moving out to seek alternative employment.

All other strands have a low relevance. This is due to the plan being high level and not designed to contain specific detail.

Screening

A screening exercise was undertaken which used baseline data and consultation responses to identify whether different groups have different needs in relation to the strategy. This is outlined below:

Baseline data

A range of information has also been collected and analysed to provide baseline information about the area and several evidence studies have been undertaken to help identify whether different groups have different needs. The findings are summarised as followed:

- Broadland and South Norfolk are likely to experience a continue fall in the share of younger people and an increase in the population aged over 45 years old. As the population grows and ages, the need to supply facilities and services and in particular the access to them, especially in the rural area, will become increasingly pressing. An increasingly ageing population and a rising level of people with disabilities will require homes to be built to lifetime homes standards as well as the need to provide specialised accommodation where appropriate including supported housing, care facilities and retirement communities.
- The retention and attraction of young people through jobs provision and access to the housing market is a key priority. There is a need to expand all sectors of the economy and workforce but in particular to increase the proportion of higher value, knowledge economy jobs. Opportunities for innovation, skills and training need to be expanded in parallel. This would help retain younger people in the Norfolk area rather than them moving out to seek alternative employment.
- There is an identified need in the area for Gypsy and Travellers site to reduce the problems associated with unauthorised sites and to tackle a number of problems faced by these communities, particularly relating to low educational achievements and poor health. Sites should ideally be in locations which facilitate access to local services and which particularly for transit sites follow the patterns of movement of the community.
- The proportion of the population for whom English is their second language is increasing. This is likely to have implications for the future provision of services and facilities such as education and community learning.

Consultation process

Extensive consultation was carried out through the process of producing the plan with particular effort being made to ensure that the plan reflected the views of as many interest groups as possible including some traditionally 'hard to reach' groups- the elderly, children, disabled community, ethnic minority and faith groups. Issues raised by stakeholders are as follows:

- The need for a range of city centre service functions, beyond retailing was recognised, including facilities for education, training, health and young people.
- For leisure developments respondents supported a strategy that would provide a wider range of facilities for all age groups rather than just focusing primarily on young people.
- In relation to gypsies and travellers, responses showed support for transit sites close to the A11 and A47 routes through the area. Respondents also favoured (by a small margin) the provision of more smaller sites, rather than large sites for travellers, but opposed provision of sites within the growth areas.
- Ensure that there is sufficient capacity in schools.
- Health provision for the growing elderly population.
- Better graduate opportunities and more employment opportunities in service sector jobs.
- Homes should be more suitable for old people and there is a need for more family houses with gardens.
- Young people raise the issues of:
 - the need for more affordable housing
 - insufficient jobs in the area
 - cost, reliability, poor level of bus service in the area
 - the need for more varied leisure opportunities at an affordable price
 - the need for more green spaces.
- Friends, Family and Travellers raise the issues of:
 - The limit on site size is arbitrary
 - Site search for residential sites should not be contained by main routes
 - The policy makes no mention of the separate and distinct needs of New Travellers in particular

Actions

This Joint Core Strategy is the top level strategy of the Local Development Framework and is not designed to contain a precise level of detail. As such it is not possible to carry out a full impact assessment and assess the impact on all equality strands. More detailed policies and proposals will follow in Local Development Documents as part of the Local Development Framework e.g. Site Allocations, Area Action Plan and Development Management Policies. These documents will be subject to equality impact assessments but in many instances it will not be until the action stage e.g. masterplan or planning application stage that a full impact assessment will be required. This initial impact assessment will be used to inform these plans and proposals from the early stages to ensure all the above issues are taken into consideration at the appropriate stage.

Concluding remarks

The evidence does not suggest that this strategy could potentially adversely affect people due to age, disability, gender, race, religion or sexual orientation. This strategy 'sets the scene' for future policies and proposals which will all be subject to a Diversity Impact Assessment at the action stage.

Appendix A – Diversity impact assessment

Test of relevance pro forma

Name of the policy or function: Joint Core Strategy for Broadland, Norwich and South Norfolk

Date relevance test conducted: 05/08/09

Is the policy or function: New? Revised? Existing?
(please tick as appropriate)

Can the delivery of this policy or function help the council deliver the following equality duties?	Equality strands																	
	Race			Gender			Disability			Age			Sexual orientation			Religion/belief		
1. Promoting equality of opportunity	M			L			L			M			L			L		
2. Eliminating discrimination	M			L			L			L			L			L		
3. Preventing harassment	M			L			L			L			L			L		
4. Promoting good relations	M			L			L			L			L			L		
5. Encouraging participation in public life	L			L			L			L			L			L		
No. of relevant elements per strand	H	M	L	H	M	L	H	M	L	H	M	L	H	M	L	H	M	L
	0	4	1	0	0	5	0	0	5	0	1	4	0	0	5	0	0	5
Total:	H 0						M 5						L 25					

Priority level:

High relevance: The policy or function is relevant to **4 or 5** elements of the general equality duty.

Action required: Complete a full diversity impact assessment during **year 1**.

Medium relevance: The policy or function is relevant to **2 or 3** elements of the general equality duty.

Action required: Complete an initial screening and/or a full impact assessment by **year 2**.

Low relevance: The policy or function is relevant to **0 or 1** elements of the general equality duty.

Action required: Complete an initial screening by **year 3**.

Directorate: Regeneration and Development

Name and contact details of relevant assessor: Joy Brown (Planner)

Comments or recommendations: Undertake a Diversity Impact Assessment initial screening