

Report for Resolution

Report to	Executive 10 February 2010
Report of	Head of Planning and Regeneration
Subject	Joint core strategy – proposed submission to the Secretary of State

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Purpose

This report updates members on the progress of the joint core strategy (JCS), the outcome of the recent Regulation 27 consultation on the soundness of the document and the latest evidence available. This also advises members about the recommendations of the Greater Norwich Development Partnership to the constituent councils about moving to the next stage of the joint core strategy. This report asks that Executive recommends to Council that it resolves to submit the joint core strategy to the Secretary of State, provided the final consideration of the Water Cycle Study and the Appropriate Assessment are satisfactory.

Recommendations

- 1) To note the revised evidence base; representations received on soundness and the potential risks in relation to the Joint Core Strategy process.
- 2) To delegate authority to the Director of Regeneration and Development, in consultation with the Portfolio Holder for Sustainable City Development and with other GNDP partners to:
 - (a) make any further typographical corrections to the schedule of minor changes that might be required to appendix 1 to the GNDP policy group report;
 - (b) approve any other technical documents required to be submitted alongside the joint core strategy under Regulation 30; and
 - (c) produce a joint assessment of the final reports of the Water Cycle Study and Appropriate Assessment for consideration by constituent authorities.
- 3) Subject to there being a satisfactory outcome following consideration by GNDP Directors and Portfolio Holders of:
 - (a) the final report of the “Water Cycle Study” and any views on it from Natural England, the Broads Authority, the Environment Agency or Anglian Water; and
 - (b) the final report of the Appropriate Assessment and views on it from Natural England,

to recommend Council to:-

- 1) agree that the “Joint Core Strategy for Broadland, Norwich and South Norfolk: proposed submission document (Nov 2009)” as amended by the schedule of proposed minor changes is legally compliant and sound;
- 2) submit it 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 paragraph 5.1 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 summer 2010 will have costs associated with the Inspector(s), support and accommodation”. Provision needs to meet the cost of producing this statutory plan each year and provision is being made in the 2010/11 budget for anticipated costs.

Risk Assessment

The risks 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: “Submitting the JCS prior to the resolution of some significant issues, particularly relating to water, may pose an increased risk to the soundness of the document. However, there is no guarantee that these issues will be resolved in the near future and submission is likely to stimulate resolution. The risk to soundness is outweighed by the risks associated with delay. Delaying submission increases the chances of housing development coming forward through planning applications and appeals without complying with the higher environmental standards required, providing sufficient affordable housing, or contributing to strategic infrastructure.”

The GNDP policy group on 28 January 2010 considered areas of potential risk.

- a) There has previously been uncertainty about the funding and delivery of the Northern Distributor Road. The NDR is significant because the spatial distribution of a large part of the area relies on it being delivered. However the positive government announcements about ‘programme entry’ and the ‘community infrastructure fund’ mitigates this risk;
- b) With the Water Cycle Study there is remaining uncertainty about water supply constraints in relation to the planned level of growth, the Water Framework Directive, and wastewater treatment. This is not an issue unique to Norwich and may need regional and national initiatives to resolve it. The Government Office has advised the GNDP not to delay progress because of this uncertainty. These uncertainties are potential risks to soundness but however officers have advised that the GNDP should proceed, having considered the implications of this risk. Locally, there are implications for Acle, Reepham and Long Stratton, as well as uncertainties about the timing and funding of major water infrastructure, such as an ‘interconnector sewer’ serving urban Norwich and the surrounding area. The main stakeholders

will be providing position statements on these issues. There will be full consideration of these and the outcomes will be available to report to councils;

- c) Following the completion of the Water Cycle Study the Appropriate Assessment is now available. There are uncertainties arising from this assessment and they are inextricably linked with the water cycle study. At present, there is uncertainty about what the solutions to the issues might be – some would need intervention by government. Again, there is no case to delay progress on the strategy, as this would not help a resolution to come forward more quickly;
- d) On 25 January 2010 the GNDP received copies of counsel's opinion from John Pugh-Smith sought on behalf of a number of interested parties. The opinion is concerned with legal aspects, procedural aspects, and the evidence to support the GNDP's favoured growth strategy, particularly in relation to South Norfolk. The opinion comes to the conclusion that:

"Taking all the [above] factors into account my concerns have been heightened that there are sufficiently serious doubts in the fundamental soundness of the plan-making process, and, of the JCS itself, that it must be withdrawn."

The GNDP policy group gave this potential challenge detailed consideration. Legal advisors to the GNDP have pointed out that Members have previously considered the balance between managing risks to soundness with the need to make progress on the strategy. Striking this balance is a matter of judgment for members to make, whilst also being mindful of potential risks to soundness. It is government policy to make progress on core strategies in a timely and efficient manner (PPS12), and recognises the need to deliver housing (PPS3).

The above factors are considered to represent the main potentially significant risks to soundness, both individually and collectively and members need to understand them. However, regard should also be had to the potential for some of these risks to be mitigated by progress which may be demonstrated by the time of the public examination.

Although there can be no guarantee that the JCS will be found sound, or will not be susceptible to legal challenge, delaying progress on the strategy is likely to increase the risk of planning proposals coming forward, possibly in locations that are not supported by the emerging strategy and potentially not delivering infrastructure and the positive policy framework needed to support the regeneration, development and growth of the City. GNDP Councils are increasingly vulnerable to challenges as to whether they have a five-year land supply for new homes (as required by government policy) and important decisions may be made at planning appeals.

Continuing to make progress on the Joint Core Strategy will help to establish it as a material consideration in planning decisions, albeit one to which comparatively limited weight can be attached to until it is adopted.

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

Paul Rao
Graham Nelson

01603 212526
01603 212530

Background Documents

Please note: Copies of relevant documentation are available for members from the contact officers for this report. CDs containing the most recent evidence reports have also been placed in each members group office. Many background documents supporting the joint core strategy are also available from the Greater Norwich Development Partnership’s website www.gndp.org.uk (follow the ‘document finder’ link) and the website will be updated shortly to ensure the public availability of all relevant documents in advance of Council.

Supplementary report on “Joint Core Strategy: recommendation for submission” to GNDP Policy Group on 28 January 2010 regarding transport assessment.

Letter dated 25th Jan 2010 from the Barton Willmore and attached legal opinions concerning the soundness of the Joint Core Strategy

Final draft Water Cycle Study, January 2010 (draft)

Task 2 Appropriate Assessment, Mott MacDonald, January 2010 (draft)

Norwich Area Transportation Strategy/Northern Distributor Route supporting documentation

Greater Norwich Housing Market Assessment: Update

Rackheath Eco-community: Programme of Development

Regulation 27 representations on joint core strategy

Report

Background

1. The Greater Norwich Development Partnership (GNDP) is managing the production of a joint core strategy 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. Once adopted, the strategy will set the overall spatial vision, objectives and high level policies to shape the future of greater Norwich. 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.
3. Work started on the strategy started in 2007, and since then there have been wide-ranging consultations with the public, 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 different role in this, and there have been numerous briefings with them as the strategy has progressed. There have also been substantial briefings for council members at key stages of the strategy's preparation. The Local Development Framework Working Party has also had an important role to consider emerging details and the main choices that needed to be made. The Working Party's views have been reported to Executive to inform decisions.

Previous report to Council – publication under Regulation 27

4. The report on the joint core strategy to Council on 29 September 2009 described the work of the Greater Norwich Development Partnership to produce a spatial planning strategy for greater Norwich; the reason it is being prepared jointly for the local planning authority areas of Broadland, the City of Norwich and South Norfolk; and the 'grand challenges' that the strategy needs to address. That report drew members' attention to the substantial evidence base gathered to inform and justify the choices which members made.
5. Members were advised that when the joint core strategy is adopted it would provide the main strategic planning policies for the city and the greater Norwich area. It is part of the plan-making system: 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.
6. The report to Council drew attention to the main issues and potential risks to the strategy. Challenges would be in relation to 'tests of soundness' – tests concerned with how the GNDP local planning authorities have prepared the strategy and its compliance with legal and procedural requirements and whether the plan is justified and effective. Having regard to all of the evidence to date, issues and potential risks, the Council resolved to approve the joint

core strategy for 'publication' under Regulation 27 of the plan-making procedures and invite public representations on the 'soundness' of the joint core strategy. This took place during November and December 2009.

Current status of the joint core strategy

7. The report to the Greater Norwich Development Partnership on 28 January 2010 (attached as appendix 1 herewith) sets out the current position regarding the strategy.
8. The GNDP report provides details of the evidence that has recently emerged, and representations made on the document during the recent Regulation 27 publication period. A summary of the key points in that report is set out below.
9. Emerging evidence and other issues:
 - a) Water Cycle Study and Appropriate Assessment (GNDP report, appendix 2)

The final report of the Water Cycle Study is currently being assessed. Position statements on it have been sought from the key stakeholders involved in the process: Anglian Water, the Broads Authority, the Environment Agency and Natural England. At present, there are uncertainties relating to:

- The Environment Agency's Review of Consents and what this means for the availability of water resources; and
- The infrastructure, phasing and funding of measures, including a review of technologies currently available to protect water quality.

The GNDP report is clear that a resolution to these uncertainties will involve guidance at a national level about providing growth and complying with the Water Framework Directive. Delaying the submission of the joint core strategy will not help to resolve these matters. Moving ahead with the strategy however, will add to the urgency for a resolution.

It is the duty of the three local planning authorities to assess whether the joint core strategy would have a significant adverse impact on European protected sites. GNDP directors and Portfolio Holders will fully consider these studies, their conclusions, and any comments on them from Natural England, the Broads Authority, the Environment Agency and Anglian Water. However, this process of consideration will not be completed until after Executive has met. The recommendations on these matters will be reported directly to Council.

- b) Following the completion of the Water Cycle Study the Appropriate Assessment is now available. This assessment is concerned with the Habitats Directive, and the internationally important sites in the Broads and the Wensum. Directors and Portfolio Holders will give the assessment full consideration, alongside the Water Cycle Study. The conclusions will also be reported directly to Council.

c) Planning Policy Statement 4: sustainability economic growth

New government guidance was published in January 2010. The joint core strategy is considered to be generally consistent with PPS4. Two possible inconsistencies are addressed by proposing minor changes to the strategy;

d) Norwich Area Transportation Strategy /Northern Distributor Road (NDR)

The Government announcement in December 2009 of 'programme entry' for the NDR significantly improves certainty of delivery for this critical; infrastructure, and a package of complementary transportation measures which comprise the NATS implementation programme;

e) Greater Norwich Housing Market Assessment update (GNMP report, appendix 5) concludes that the housing need across the area is greater, and reinforces the strategy's approach to affordable housing

f) Rackheath Eco-community – noting the submission of the programme of delivery to the government, and anticipating an announcement on funding in January 2010.

10. In addition, the East of England Regional Assembly has confirmed that the joint core strategy is in general conformity with the East of England Plan.

Representations on soundness

11. The GNMP report sets out the main areas of public challenge to the soundness of the joint core strategy. Over 560 representations were received from around 260 people and organisations by the 14 December 2009 deadline. The key challenges raised to the strategy's soundness were concerned with:

- Legal Compliance and process;
- Internal inconsistencies of the strategy;
- Evidence base;
- Deliverability;
- Energy, water and design policies;
- Viability of affordable housing target;
- Selection/omission of growth locations in the Norwich Policy Area;
- Settlement hierarchy (market towns and villages).

12. The GNMP report, appendix 6 sets out the key issues raised and the proposed officer responses to them. The representations are clearly significant for the people who made them and the majority of issues have already been considered by members when considering potential risks to soundness. It is considered that none of the representations undermine the soundness of the strategy. Members should note that the GNMP produced a series of topic

13. As part of the public examination, the inspector will consider the deliverability of the joint core strategy – this is an important aspect of soundness. However, it will be important to have made further significant progress by then on:
- The development of appropriate delivery arrangements;
 - The Integrated Development Programme as the Implementation Plan for the joint core strategy, and
 - Funding sources including an area-wide Community Infrastructure Levy to help provide strategic infrastructure.
14. Councils can respond to representations on soundness by making editing changes to improve legibility or to make sure the document is up to date. The GNDP report, appendix 1 proposes minor changes. Government guidance states that such minor changes at this stage do not require further public consultation. The schedule of minor changes will accompany the joint core strategy when it is submitted to the Secretary of State.
15. In addition, the GNDP received a copy of counsel's opinion on behalf of interested parties. The opinion challenged the soundness of the joint core strategy. Whilst it was not a representation made during the Regulation 27 publication period, it does nevertheless raise issues that required detailed consideration by the GNDP. This is addressed in greater detail in the risk assessment section of this Executive report.

City council decision making and the next steps

16. The Greater Norwich Development Partnership is an informal partnership and has no executive decision making powers of its own. A decision to move to the next stage can only be taken by the constituent councils. The joint core strategy is a 'development plan document' and is part of the local development framework, and is therefore a function of the district councils, who are the local planning authorities for the area covered by the strategy.
17. The LDF is part of the council's policy framework and should the relevant constituent councils agree the recommendations of this report, the joint core strategy will be submitted to the Secretary of State. Once submitted, the joint core strategy (as a development plan document) cannot be withdrawn, unless the councils are directed to do so by the Secretary of State, or the inspector requires it.
18. Submitting the document also starts the public examination process, which will include public hearing sessions, and ends when the independent inspector issues a report on the examination to the councils. The inspector's report is binding. If the inspector finds the strategy to be sound the councils would be asked to adopt the strategy, and complete the final adoption procedures. If it were found to be *unsound* the councils would need to consider how to proceed at that time.
19. The decision that now needs to be made by the council is to agree that the

strategy remains sound, having regard to the evidence, the representations received on soundness, and the issues and risks that have been highlighted. By submitting the document, Members understand that there is no further discretion in the plan-making process and a decision to submit is accepting that this is the strategy the council would wish to adopt (as amended by the schedule of changes).

20. A decision to amend this part of the policy framework can only be made by the Council. It is not a function that can be delegated to Executive. However, the constitution first requires Executive "To prepare for adoption by the Council the budget and the plans which fall within the policy framework", and "To make recommendations to the Council on matters reserved to the Council" (Council constitution, Article 7, The Executive).
21. Executive are asked to consider the recommendations to councils of the GNDP, and consider the information that is currently available. Subject to detailed consideration on the final reports of the Water Cycle Study and the Appropriate Assessment, and comments from key stakeholders on them, Executive is asked to recommend that the Council agrees that it remains legally compliant and sound and resolves to submit the joint core strategy and the schedule of proposed minor changes to the Secretary of State.
22. In order to meet the GNDP's timetable for submission, officers need to bring this report to Executive at the earliest possible opportunity. This would enable a complete and comprehensive report to be prepared to Council that covers outstanding issues and follows the required procedures. A meeting of the LDF Working Party will take place in late February 2010 and the Portfolio Holder will be report any comments directly to the Council.
23. All three Councils of Broadland, Norwich and South Norfolk must agree this recommendation. Once this has been achieved, the GNDP propose to submit the strategy to the Secretary of State as quickly as possible.
24. In summary, the next immediate steps are:

<i>28 January</i>	<i>GNDP Policy Group</i>
10 February	Executive
w/e 12 February	Consideration of Water Cycle Study and Appropriate Assessment
22 or 24 February	Local Development Framework Working Party
<i>22 February</i>	<i>South Norfolk Council meeting</i>
<i>25 February</i>	<i>Broadland District Council meeting</i>
2 March	Norwich City Council meeting
early March	Submission to Secretary of State at the earliest opportunity

25. **Important note:** There are two key documents on which members are asked to make a decision. The first document under consideration is “*The Joint Core Strategy for Broadland, Norwich and South Norfolk – proposed submission document*” (November 2009). Due to its size it is not attached to this report as an appendix. It is available electronically from the GNDP website at www.gndp.org.uk (follow the link to ‘document finder’). Alternatively, printed copies are available on request from the contact officers for this report. The second key document is the ‘*schedule of proposed minor changes*’. This is to be found in the GNDP report (appendix 1), which is attached to this Executive report.

Joint Core Strategy : Recommendation for submission

Report by GNDP Directors

Summary

Broadland District Council, Norfolk County Council, Norwich City Council and South Norfolk Council have previously considered the Joint Core Strategy Proposed Submission Document to be legally compliant and “sound”. Members must now consider the evidence that has recently emerged and representations made on the document during the recent publication period. Some uncertainty remains, particularly related to water cycle issues. However, taking account of all the issues raised, delay is not advised.

Recommendation

Having taken account of the new evidence identified in this report and representations received during the publication period, the Greater Norwich Development Partnership Policy Group

- 1. consider that the Proposed Submission Document remains legally compliant and sound, subject to consideration of the final reports of the Water Cycle Study and Appropriate Assessment**
- 2. delegate authority to the GNDP Directors, in consultation with portfolio holders, to:**
 - (a) make any further typographical corrections to the schedule of minor changes that might be required;**
 - (b) approve any other technical documents required to be submitted alongside the JCS under Regulation 30; and**
 - (c) produce a joint assessment of the final reports of the Water Cycle Study and Appropriate Assessment for consideration by constituent authorities.**
- 3. recommend that Broadland District Council, Norfolk County Council, Norwich City Council and South Norfolk Council:**
 - (a) approve the schedule of proposed minor changes to the Joint Core Strategy; and**
 - (b) resolve that the “Joint Core Strategy for Broadland, Norwich and South Norfolk: proposed submission document” and the schedule of proposed minor changes should be submitted to the Secretary of State under Regulation 30 of the Town and Country Planning (Local Development) Regulations 2004 (as amended) subject to:**
 - (i) consideration of the final report of the “Water Cycle Study” and any views on it from Natural England, the Broads Authority, the Environment Agency or Anglian Water; and**
 - (ii) consideration of the final report of the Appropriate Assessment and views on it from Natural England**

1. **Background**

- 1.1. On 24 September 2009 Members considered a report on a draft “proposed submission” version of the Joint Core Strategy (JCS). That report sets out the background, process, the tests of soundness, evidence and risks that Members must consider before agreeing to submit the JCS. At that stage the Greater Norwich Development Partnership authorities considered the JCS proposed submission document to be sound and agreed it for publication under Regulation 27 of the 2008 Town and Country Planning regulations to allow representations on legal compliance and soundness.
- 1.2. The GNDP authorities must now consider whether any of the evidence that has subsequently emerged, or the representations to the proposed submission version of the JCS, call into question the legal compliance or soundness of the document.
- 1.3. The 2008 Regulations enable the local authority, if faced with issues of soundness raised during representations, to undertake mitigating action. This could include proposing changes to the development plan document. Changes can be minor, focussed or extensive as outlined below.
- 1.4. Minor editing changes can be made to improve legibility or ensure the documents is up to date. These are the kind of changes which could be made to a development plan document without consultation. A schedule of proposed minor changes is included for approval in Appendix 1. When agreed the schedule will accompany the JCS submission to the Secretary of State.
- 1.5. More significant changes to address soundness issues would be either “focused” or “extensive”. A “focused change” would usually cover only two or so subject areas, or a limited part of the plan area and should involve only a relatively small proportion of a development plan document’s text. An “extensive change” would run right through the development plan document’s content and/or the plan area and would require further evidence gathering. Both types of change would require a review of the sustainability appraisal and additional consultation, and would lead to significant delay to submission. Neither course of action is recommended for the JCS.
- 1.6. The remainder of this report outlines issues and evidence that have emerged since the decision to publish the proposed submission document and the responses to publication. More detail is included in a series of appendices and a complete set of documentation is provided on a CD accompanying this report. All the new evidence and responses will be available on www.gndp.org.uk

2. **Emerging evidence and other issues**

The Water Cycle Study

- 2.1. A final draft of the Water Cycle Study is complete and Natural England, Anglian Water, the Environment Agency and the Broads Authority have committed to producing position statements on it to inform this meeting. The draft is provided on a CD accompanying this report and a copy will be available at your meeting. The completed Water Cycle Study, with decisions on sign off by the above stakeholders, will be available to the constituent authorities when considering submission of the Joint Core Strategy.

- 2.2. Appendix 2 provides further detail on the final Stage 2B report. Headline issues are:
- Uncertainty remains until the conclusion of the Review of Consents process is concluded in March and Anglian Water's Water Resources Management Plan is released later in 2010.
 - The timing and nature of a solution to water supply constraints is currently unclear. However, subject to the Review of Consents process, it is expected that a solution will not be required until later in the JCS period and it is also expected that a suitable solution will be identified in the Water Resources Management Plan.
 - Strict compliance with the Water Framework Directive is likely to be unachievable, particularly in terms of phosphorus, at a number of wastewater treatment works. The recommended strategy is therefore one of "planned deterioration", i.e. utilising existing consents. This approach requires verification from the Environment Agency. It is understood to be partly an issue of technical non-compliance as it is unclear whether a marginal breach of the standards would adversely affect local ecology.
 - If the recommended strategy using existing consents in the final draft Water Cycle Study is adopted then problems would remain at Acle, Long Stratton and Reepham. The planned scale of growth at these locations will only be possible if new housing and other developments include innovative solutions to disposal. The deliverability and viability of these solutions has not been evaluated but is likely to be expensive. Of these issues, the uncertainty at Long Stratton, where capacity at the existing waste water treatment works is limited to 1400 additional dwellings, is the most significant challenge to the ability to demonstrate delivery of the strategy.
 - Strategic interceptor sewers are required to deliver growth in and around Norwich. The timing and funding of these will require resolution. Current planned implementation post-2020 and a potential requirement for significant developer contributions may delay delivery of identified growth within Norwich and at Easton/Costessey, Cringleford and Hethersett. Depending on their location, this requirement may also delay delivery of new allocations in the Norwich Policy Area for employment and for the smaller housing sites allowance in Broadland and South Norfolk.
- 2.3. The findings of the Water Cycle Study reinforce JCS Policy 3 which seeks to achieve higher standards of water use in new development ahead of government targets. Reflecting the final outcome of the Water Cycle Study and the views of the Environment Agency, the Examination may need to consider strengthening this policy.
- 2.4. While considerable uncertainty remains on water issues, delaying submission of the JCS is unlikely to stimulate a speedy resolution. When making their decision on submission, the constituent planning authorities will have the benefit of the position statements of each of the Water Cycle Study participants. Significant water issues are common to many other locations across the country and resolution is likely to require initiatives which are currently being considered at the regional and national levels. It is understood that GO-East would not advise a delay to submission on this issue.

Appropriate Assessment

- 2.5. Previous iterations of the Appropriate Assessment have shaped the development of the JCS. Finalisation of the draft Appropriate Assessment has been awaiting the completion of the Water Cycle Study. Natural England must be consulted on the final draft Assessment and it is unlikely that they will have had the opportunity to respond prior to this meeting. Given the findings of the Water Cycle Study it is expected that there will remain some uncertainty around the outcome of the Appropriate Assessment. However, the final Appropriate Assessment report and the views of Natural England will be available in time for a full appraisal by your officers to enable proper consideration by the constituent authorities when the decisions on submission are made.
- 2.6. It would be inadvisable for authorities to submit the JCS until the comments of English Nature on the Appropriate Assessment have been properly considered. However, the issues are inextricably linked to the Water Cycle Study and the Review of Consents, and their resolution is likely to require a change of approach nationally. Moreover, the impacts of water issues on international sites largely relate to the overall scale of development rather than to its specific distribution. Ultimately, the issues are likely to be discussed, and resolved, through the Examination and, if necessary, through intervention by Government. Consequently, it is not thought likely that the outcome of the Appropriate Assessment and the views of Natural England will delay submission.

Planning Policy Statement 4 : Planning for Sustainable Economic Growth

- 2.7. Revised government policy covering economic development and town centre uses was released late last year (available at <http://www.communities.gov.uk>). The JCS had taken account of draft PPS4 and is considered to be generally consistent with the final policy statement. However there are two areas of potential inconsistency.
- In relation to out of centre retail and leisure applications PPS4 requires Local Development Frameworks to consider setting floorspace thresholds for impact assessments if authorities consider they should be lower than a national standard of 2,500 m² gross. A lower threshold would be strongly advised to avoid impacts on smaller centres. As this would need to be consistent across the three authorities, the JCS would have been an appropriate vehicle to set the threshold. However an alternative would be to commit to co-ordinated or joint development management policies. A reference to this in the supporting text of the JCS is suggested “minor change”.
 - The PPS requires local planning authorities to “strictly control economic development in open countryside away from existing settlements, or outside areas allocated in development plans”. JCS Policy 17 takes a more encouraging approach to development in the countryside. However, the soundness of this approach has not been specifically challenged.

Norwich Area Transportation Strategy (NATS) including the Northern Distributor Road (NDR)

- 2.8. Significant progress has been made in the development and delivery of NATS/NDR.
- The Government announcement at the end of last year released funding for the first stage of the NDR with the improvement of Postwick junction, and confirmed “programme entry” for the second stage to the A140 (north of the airport). The Department for Transport press release is included as Appendix 3 and it is expected to have their final letter available for your meeting. Although subject to further consideration, the County Council’s current position is to continue to progress the full scheme identified in the JCS from Postwick to the A1067 Fakenham Road.
 - Further modelling work has been undertaken. A report outlining new and existing evidence is included in Appendix 4 (to follow). The detailed evidence will be available on a separate CD. The evidence demonstrates the need, benefits and deliverability in principle of the strategic elements of NATS, as reflected in the JCS, and the critical role of the NDR in facilitating the wider strategy.
 - Elements of NATS are already being progressed, including improvements to the Dereham Road bus corridor and the St Augustine’s gyratory. Wider NATS implementation was the subject of consultation in October/November 2009 and the County Council is due to agree an Implementation Plan in April 2010. The Implementation Plan will include schemes required to deliver the JCS.
 - The County Council has appointed planning consultants and intends to submit a planning application for the NDR in autumn 2010.
- 2.9. The further evidence and other developments provide additional justification for JCS policies related to or dependent on NATS/NDR and significantly improve certainty of delivery.

Greater Norwich Housing Market Assessment : Update

- 2.10. The Housing Market Assessment has been updated. The Executive Summary is included as Appendix 5 with the full report included on your CD. It concludes that the overall requirement for housing across the sub-region has increased, with the proportion of affordable housing need of over 43%. This evidence confirms and reinforces the approach to affordable housing in the JCS.

Rackheath Eco-community

- 2.11. A Programme of Delivery has been submitted to Government and an announcement on funding is expected in late January 2010. This also demonstrates commitment to and delivery of a significant element of the JCS.

3. Conformity with the East of England Plan

- 3.1. Regulation 29 requires a core strategy to be in general conformity with the regional spatial strategy. EERA has confirmed that the JCS is in general conformity with the East of England Plan.

4. **Representations under Regulation 27 (pre-submission publication)**

- 4.1. Over 560 representations were received from around 260 individuals and organisations. Several representations were made in support of the JCS. Five late representations were received but these raised no issues not covered by other representations.
- 4.2. The representations are wide ranging and clearly raise issues that are significant for the individuals and organisations concerned. This report concentrates on the key challenges that members need to consider before concluding that the JCS remains sound. Members should note that the issues covered by the key challenges are largely consistent with the risks identified prior to the proposed submission publication.
- 4.3. Appendix 6 sets out in more detail the key issues raised by representations and officer responses to them. A full set of representations is included on the CD accompanying this report and a paper copy will be available at your meeting. Appendix 6 will be expanded to form a summary of key issues, as required under Regulation 30, to be submitted alongside the JCS to inform the Inspector(s) consideration of issues for the public examination.

Government Office response

- 4.4. The GO-East response was written prior to the announcement on the NDR and completion of the draft final Water Cycle Study. It includes some comments on detailed content, but no challenges to the soundness of the JCS.

Legal compliance

- 4.5. A limited number of representations challenge the legal compliance of the JCS. One representation is supported by counsel's opinion. These challenges relate to:
- Process issues including the nature of the decision making structures, premature decision making in relation to the availability of evidence, and the public availability of evidence, agendas and minutes.
 - The failure to deliver sustainable development as required by the Planning and Compulsory Purchase Act 2004.
 - Failing to consider properly the outcome of the sustainability appraisal.

Internal inconsistencies in the strategy

- 4.6. Representations draw attention to a number of perceived internal inconsistencies in the JCS, for example the tensions between climate change and environmental objectives on the one hand and large scale growth and new roads on the other.

Major growth locations :New or expanded communities in the Norwich Policy Area (Policy 10)

- 4.7. Significant challenges have been made to the scale and distribution of major growth. In particular, there are significant challenges to the rationale for the scale of growth at Hethersett, Wymondham and Long Stratton. In the case of Hethersett and Wymondham generally higher levels of growth are proposed. Proposers of higher levels of growth elsewhere tend to challenge the sustainability and delivery of the

strategy for Long Stratton.

- 4.8. While a number of locations for smaller scale growth (i.e. less than 1,000 dwellings) are proposed, no challenges from the development industry to the soundness of the JCS involve the promotion of alternative locations for major growth to those identified in Policy 10.

Deliverability

- 4.9. Challenges to deliverability include those relating to:
- The lack of detail in the Implementation Schedule and challenges to apportionment of costs.
 - The failure to consider better alternatives resulting in a dispersed pattern of growth in South Norfolk that will make the delivery of strategic infrastructure more difficult.
 - A level of growth in the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle could proceed ahead of, or without, additional infrastructure and in particular the NDR. A related argument challenges the ability to bring forward the development fast enough to deliver the required level of growth in the JCS period.
 - The strategy is insufficiently flexible with no alternatives to take account of undelivered infrastructure or unexpected delays to housing locations.
 - the ability to deliver the strategy in relation to Long Stratton.
 - timely implementation of water infrastructure.

Policy 2 : Promoting Good Design, and Policy 3 : Energy and Water

- 4.10. There are significant objections from the development industry to the lack of consultation, justification and viability of water, energy and design policies, and in particular, the imposition of challenging targets. Conversely, the Environment Agency suggests that water efficiency targets should be tougher. GO-East welcome the broad ambitions for driving up the performance of new development in relation to energy and water.

Policy 4 : Housing delivery

- 4.11. The viability and justification for market housing developments to include 40% affordable housing across the GNDP area is challenged by most representations from the development industry.

Policy 9 : Strategy for Growth in the Norwich Policy Area & Policy 10 : Locations for major new or expanded communities in the Norwich Policy Area

- 4.12. The challenges largely reflect those outlined under “Deliverability” above. In addition some objectors to the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle challenge the failure to consider alternatives including better locations, such as the A11 corridor, and a greater degree of dispersal in Broadland.
- 4.13. A number of challengers suggest that the lack of clarity on locations to accommodate the smaller sites allowances for the Norwich Policy Area undermines the soundness of the Strategy.

Policies 13-17 relating to Towns, Key Service Centres, Service Villages, Other Villages, Smaller rural communities and the countryside

4.14. Key challenges include:

- Insufficient consideration of the role of Market Towns with a consequent lack of a clear strategy. This particularly applies to Diss where the deficiency is compounded by insufficient account of cross-boundary issues with areas of Suffolk.
- Unclear rationale for, and justification of, housing numbers within and between all layers of the hierarchy.
- Inconsistent approach to the identification of Service Villages between Broadland and South Norfolk.

Conclusions on the response to key representations

4.15. While there are a range of significant challenges to the JCS, the majority of issues raised have already been considered by Members when assessing identified “risks” and these were not considered to undermine the soundness of the Strategy.

4.16. Deliverability is a key aspect of soundness. While there are a number of important issues still outstanding, some uncertainty should be expected in long-term strategic planning. The important point is to ensure that the mechanisms are in place to demonstrate that the GNDP and delivery partners are committed and able to deliver the Strategy and find ways round problems as they emerge. To this end the Inspector(s) at the Examination will be able to take significant comfort from the track record of the GNDP in delivering growth projects and working with key partners. It will also be important to have made further significant progress on:

- the development of appropriate delivery arrangements,
- the Integrated Development Programme as the Implementation Plan for the JCS, and
- funding sources including an area wide Community Infrastructure Levy to help provide strategic infrastructure.

5. **Resource Implications**

5.1. **Finance** : 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 summer 2010 will have costs associated with the Inspector(s), support and accommodation.

5.2. **Staff** : The JCS is being developed with existing staffing resources in the four authorities and the GNDP.

5.3. **Property** : Some of the authorities’ land holdings could be affected by the JCS but this must not influence planning decisions.

5.4. **IT** : None

6. **Other Implications**

- 6.1. **Legal Implications** : This report has no direct legal implications. The Regulations which accompany the preparation of a Development Plan Document are being adhered to. Failure to consider the Regulations and proceed in accordance with them could result in either the document being found unsound or a legal challenge.
- 6.2. **Human Rights** : The process of engagement undertaken throughout the JCS process has ensured that any potential impacts have been properly considered.
- 6.3. **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 of the JCS has been completed.
- 6.4. **Communications** : The GNDP has developed a Communications Strategy. In line with this, the GNDP has kept relevant parties informed of progress throughout the process of developing the Joint Core Strategy and has invited responses at each key stage of the process. The evidence studies and supporting information has been made available on the GNDP web-site and at each of the Council's offices. All respondents to the Proposed Submission Document and all the general and specific bodies will be kept informed of the next stages of the JCS process.
- 6.5. **Health and safety implications** : None
- 6.6. **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.
- 6.7. **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. **Risk Implications**

- 7.1. Submitting the JCS prior to the resolution of some significant issues, particularly relating to water, may pose an increased risk to the soundness of the document. However, there is no guarantee that these issues will be resolved in the near future and submission is likely to stimulate resolution. The risk to soundness is outweighed by the risks associated with delay. Delaying submission increases the chances of housing development coming forward through application and appeal without complying with the higher environmental standards required, providing sufficient affordable housing, or contributing to strategic infrastructure.

8. **Alternative Options**

- 8.1. Members could agree to recommend that the JCS requires further work to ensure that it is sound. This is not recommended as
- The JCS is already supported by a significant body of evidence and it is never possible to resolve all areas of uncertainty.
 - No significant issues have emerged from representations that Members had

not previously considered when agreeing that the JCS was sound.

- It would cause significant delay in the implementation of much needed policies.
- In the interim we can not demonstrate a 5 year land supply for housing in the Norwich Policy Area.

9. **Conclusion**

- 9.1. Having considered and taken account of all the implications of recent evidence and representations, Members need to confirm that the JCS remains sound. The GNDP can then advise the constituent authorities that the JCS should be submitted to the Secretary of State. While it is the statutory responsibility of the three Local Planning Authorities to submit the document, the Recommendation of this report includes specific reference to the County Council to ensure that it is clear that submission is supported by all four Councils involved in the production of the JCS.

The decision to submit must be based on the existing evidence. This is considered to be sufficiently robust to demonstrate the soundness of the overall strategy. However, the GNDP needs to continue to demonstrate progress on resolving uncertainties and delivery constraints through further development of the Partnership and the Integrated Development Programme, and by making significant progress on funding mechanisms including the Community Infrastructure Levy.

The attached schedule of minor changes will, when agreed by Councils, be recommended to the Examination to clarify the Strategy and correct errors.

Recommendation

Having taken account of the new evidence identified in this report and representations received during the publication period, the Greater Norwich Development Partnership Policy Group:

- 1. consider that the Proposed Submission Document remains legally compliant and sound, subject to consideration of the final reports of the Water Cycle Study and Appropriate Assessment**
- 2. delegate authority to the GNDP Directors, in consultation with portfolio holders, to:**
 - (a) make any further typographical corrections to the schedule of minor changes that might be required;**
 - (b) approve any other technical documents required to be submitted alongside the JCS under Regulation 30; and**
 - (c) produce a joint assessment of the final reports of the Water Cycle Study and Appropriate Assessment for consideration by constituent authorities.**
- 3. recommend that Broadland District Council, Norfolk County Council, Norwich City Council and South Norfolk Council:**
 - (a) approve the schedule of proposed minor changes to the Joint**

Core Strategy; and

- (b) resolve that the “Joint Core Strategy for Broadland, Norwich and South Norfolk: proposed submission document” and the schedule of proposed minor changes should be submitted to the Secretary of State under Regulation 30 of the Town and Country Planning (Local Development) Regulations 2004 (as amended) subject to:
- (i) consideration of the final report of the “Water Cycle Study” and any views on it from Natural England, the Broads Authority, the Environment Agency or Anglian Water; and
 - (ii) consideration of the final report of the Appropriate Assessment and views on it from Natural England.

Background Papers

Joint Core Strategy for Broadland, Norwich and South Norfolk : Proposed submission document

Report on the above to GNDP Policy Group on 24 September 2009 and supporting papers

Final draft Water Cycle Study (See CD)

Planning Policy Statement 4 : Planning for Sustainable Economic Growth

NATS/NDR supporting documentation (See CD)

Greater Norwich Housing Market Assessment : Update (See CD)

Rackheath Eco-community : Programme of Development

Regulation 27 Representations (See CD)

Officer Contact

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

Name	Telephone Number	Email address
Phil Morris	01603 638306	phil.morris@norfolk.gov.uk
Sandra Eastaugh	01603 638302	s.eastaugh@gndp.org.uk



If you need this report in large print, audio, Braille, alternative format or in a different language please contact 01603 638301 and ask for Amy Baxter or textphone 0344 800 8011 and we will do our best to help.

Appendix 1
Joint Core Strategy Report
Recommendation for Submission

Joint Core Strategy for Broadland, Norwich and South Norfolk: Proposed changes

Change No.	Paragraph/Policy	Proposed Change	Justification	JDI No.
Inside front cover	Foreword	Last para. Replace “are immense” with “is immense”	Grammar	Internal
Page 1	Contents Appendices, Bullet5	Delete “Coverage of the” and add “Strategic Development Allocation” at the end of the title	Clarification	Internal
Page 9	p9	First paragraph third line delete “the”	Typo	NE
Page 15	Para 3.1	Replace “ The area has two assets of international importance – its heritage and its growing knowledge economy.” With “ The area has three assets of international importance -- its heritage, natural environment and its growing knowledge economy”	Clarification	Natural England 11471
Page 17	Para 3.12	First sentence: Add “.” After “Norwich”. Make following “t” into “T”.	Correct typo	Internal
Page 17	Para 3.12	Penultimate sentence: Replace “in excess of” by “over”	Simplify text	Internal
Page 22	Spatial Vision/ p22/ first para;	Replace “36740” with “36820” and change the words “over 33000” to read “approximately 33000”	Clarification and consistency	Internal
Page 22	Spatial vision	right hand column top line delete “in” replace with “within”	Clarification	Internal

Change No.	Paragraph/Policy	Proposed Change	Justification	JDI No.
Page 24	Spatial Vision/ Urban Area of Norwich	Amend the fourth bullet point under “The Urban Area of Norwich” as follows: <ul style="list-style-type: none"> • Delete the words “as a contemporary medieval city” • After the words “architectural heritage,” insert, “by” • After the words “design quality and” insert, “maintaining and enhancing” 	Clarification	Arising from an English Heritage proposed revision (11409) which was too limiting
Page 25	Spatial Vision, and towns and villages and the rural area	In the sixth bullet point, amend last sentence after the words, “each town’s form” by adding “, historic character and quality, “	Clarification	English Heritage (11410)
Page 28	Objective 9	Add “geodiversity” after “Biodiversity”	Clarification	Norfolk Geo-diversity Part-nership (11299)
Page 28	Objective 9	Before sentence beginning “Development must provide” insert” The scale of development we have to accommodate will require the development of some significant greenfield areas, which will affect the existing landscape.” and amend the following sentences to begin “Where this is necessary, development must provide”	Clarification and consistency with strategy	Broadland Land Trust (11650)
Page 29	Key Diagram p29 (Policy 10 related)	Revise Key Diagram p29 “Key” by changing label “Long Stratton Bypass” to “Route of permitted Long Stratton Bypass”.	Clarification	Partially addresses point raised by English Heritage (11425)

Change No.	Paragraph/Policy	Proposed Change	Justification	JDI No.
Page 32	Policy 1	Right hand column, first paragraph, following "... protected species in the area and beyond" replace "due to" with "including as a result of"	Clarification	Internal
Page 32	Policy 1	Last paragraph after "their surroundings," insert, "the protection of their settings,"	Clarification	Arising from a representation from English Heritage (11411), and meeting it in part
Page 34	References	Add to list of references: "Historic Characterisation and Sensitivity Assessment (Norfolk County Council 2009)	Clarification	English Heritage (11414)
Page 35	p35	p35 – Key to map – last sentence – correct the spelling of "Infrastructure"	Typo	Page 35
Page 36	Policy 2	Last sentence of policy – add reference to spatial planning objective 9.	Clarification	Partially meets representation by English Heritage (11416)
Page 38	References	Add to list of references:for Policy 2 "Historic Characterisation and Sensitivity Assessment (Norfolk County Council 2009)	Clarification	Partially meets representation by English Heritage (11416)
Page 40	References	Add to list of references for Policy 3 "Planning Policy Statement 1 [PPS1] Delivering Sustainable Development" and "Planning Policy Statement: Planning and Climate Change Supplement to Planning Policy Statement 1"	Correction for consistency	Internal

Change No.	Paragraph/Policy	Proposed Change	Justification	JDI No.
Page 41	Policy 4, 1 st para	Replace “36740” with “36820” and precede the number “33000” with the word “approximately”.	Correction for consistency	Internal
Page 41 New	Policy 4	Insert word “minimum” before “58 permanent pitches” in the first sentence of the part of the policy which refers to Gypsies and Travellers and also after the words “between 2012 and 2026” to ensure full conformity with RSS Policy H3	To ensure full conformity with regional spatial strategy	Friends Family and Travellers (11249)
Page 42	Para 5.24	Delete all of penultimate sentence	Clarification. Unnecessary.	Internal
Page 44	5.29	At the beginning of the final sentence, after “In” add “exceptional”	Clarification	Gladedale (11436)
Page 45	Policy 4 references	Add “Norwich City Council; Affordable Housing Viability Testing; June, 2009” to references for policy 4	Clarification and correction of omission	Internal
Page 45	Policy 4 References	Add “Greater Norwich Housing Market Assessment Update – November 2009” (completed Jan 2010)	Updated information	Internal
Page 47	Policy 5 bullet point 10	Following “enterprise hubs at” insert the “the University of East Anglia,	Clarification	University of East Anglia (11385)
Page 49	Policy 6	Bullet 9, after “links” add “,telecommunications”	Clarification	Mobile Operators Association (11314)
Page 50	5.48	Add at beginning of 2nd sentence ‘Travel planning and smarter choices initiatives will be promoted....	Clarification	Highways agency (11490)
Page 50	5.46	3 rd bullet add after junction improvements ‘including public transport priority’	Clarification	Highways agency
Page 51	Paragraph 5.50 .	After “connections” add “and telecommunications”	Clarification	Mobile Operators Association (11314)

Change No.	Paragraph/Policy	Proposed Change	Justification	JDI No.
Page 52	Policy 7	Sub-heading "Crime": To first sentence add " and areas which are deficient"	Clarification	Norfolk constabulary (11521)
Page 55	Policies for places	At the end of paragraph 6.2, and "The policies refer to settlements which in some cases may extend into adjacent parishes."	Clarification	Sunguard Homes (11173)
Page 55 New	Policy 9, para6.2	After "strategy for the Norwich Policy Area and-" insert "in addition to the designation of areas for large-scale growth" (See para 6.3)	Clarification	Internal
Page 62	Policy 10	Bullet point 6: after "community" add ",police"	Clarification	Norfolk Constabulary (11524)
Page 62	Policy 10	Under "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."	Clarification	Internal
Page 63 New	Policy 10, 6 th bullet	After "Broads SAC" add "Broadland SPA and Broadland Ramsar site"	Clarification	Natural England (11474)
Page 66	Policy 10 Para 6.13	Add "significant" prior to "risk of fluvial flooding"	Clarification	Anglian Water (11585)
Page 66	Paragraph 6. 14	Top line, delete"in" replace with "within". Delete sentence starting " An area action plan..." and replace with " A Supplementary Planning Document setting out a delivery framework	Clarification	Internal

Change No.	Paragraph/Policy	Proposed Change	Justification	JDI No.
		identifying areas of growth and relating delivery of growth to key elements of infrastructure will be prepared”.		
Page 67	Para 6.22	After “Whitlingham” add “and other”	Correction for consistency	Anglian Water (11583)
Page 68	References	Add to list of references: PPG 15, PPG 16, and East of England Plan policies ENV 6 and ENV 7.	Clarification	English Heritage (11426)
Page 70	Policy 11/ p70	First bullet point: <ul style="list-style-type: none"> • delete “contemporary medieval” • after the word “character”, insert, “as identified in Conservation Area appraisals” 	Clarification	English Heritage (11427)
Page 72	p72/ References for Policy 11	First bullet point, add reference to policy ENV 6 of the East of England Plan:	Clarification	English Heritage (11428)
Page 74	Policy 12 Bullet point 4	Replace the word “redevelopments” with “developments”	Clarification	Goymour Properties Ltd (11536)
Page 77	Paragraph 6.34	After “around” in the first sentence, add “5 hectares”	Correction of omission	Internal
Page 82	Policy 14 Para 6.54	Add final sentence to paragraph “New development will have to take particular account of surface water flood issues.”	Clarification	Environment agency (11691)
Page 83	Page 83	Replace photograph of Hoveton with one within Wroxham	Correction	Internal

Change No.	Paragraph/Policy	Proposed Change	Justification	JDI No.
Page 85	Policy 15	Para 6.58 second sentence – delete “for villages outside the NPA”	Clarity and consistency	Internal and would help to address Charles Birch (11699)
Page 88	Policy 18	Policy 18 second paragraph – correct “Broads Ramsar” to read, “Broadland Ramsar”.	Correct name	Natural England (11474)
Page 89	Para 6.69	Add new final sentence to read “Coordinated development management policies for the three Districts will include consideration of a lower threshold for impact assessments than the national threshold set out in Planning policy Statement 4.”	To take account of Planning policy Statement 4	Internal
Page 99	Appendix 2 Supporting Documents	Under Research and studies ; Housing add “Greater Norwich Housing Market Assessment Update – November 2009” (completed Jan 2010)	Updated information	Internal
Page 101	Page 101	Add to list of background documents for Broadland “ various conservation area appraisals, Broadland PPG 17 open-spaces, indoor sports and community recreation assessment (2007), Broadland District Landscape Assessment and Review of Areas of Important Landscape Quality (1999) and Broadland District Landscape Character Assessment (2008)	Correction	Internal
Page 105	Appendix 5	Re- title the map as “Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Strategic Development Allocation”	Clarification	Internal

Change No.	Paragraph/Policy	Proposed Change	Justification	JDI No.
Page 112	Appendix 7	Replace all references to “AMP” for water supply and waste water infrastructure with “AMP/Developers”	Clarification and correction	Anglian Water (11584)
Page 114	Appendix 7	Under “water, option 1” correct “critical to” column by deleting “whole GNDP area” and substituting “Norwich policy area”	Clarification and correction	Internal
Page 115	Appendix 7	5 th column headed “ Critical to”, 5 th entry down, replace “South Norfolk Growth Location” with “South Norfolk Growth”	Clarification	Internal
Page 119	Appendix 7	Under “bus priority route via B1172, add “contributions” after “Developer”	Clarification	Internal
Page 120	Appendix 7	After “ Relocated rail station at Rackheath” add and new station at Broadland business park”, and double notional estimated cost to £ 50 million	Consistency with policy 10	Government Office (11568)
Page 120	Appendix 7	Add new line “pedestrian and cycle links to Norwich urban area, Broadland Business Park, Airport employment area, Rackheath employment area and surrounding countryside”, indicate promoter/delivery body as “Norfolk County Council/developer”, estimated cost “to be added”, Indicate funding sources as “NCC/ DfT/growth point/developer contributions” indicate critical to as “Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle” and indicate estimated delivery date as “2011 – 2031”	Consistency with policy 10	Government Office (11568)

Change No.	Paragraph/Policy	Proposed Change	Justification	JDI No.
Page 122	Appendix 7	On page 122 under “fire service” correct funding sources to “Norfolk County Council/ developer contribution”	Clarification and correction	Internal
Page 124	Appendix 7	First Column, after South Norfolk, delete “88 officers” and replace with “89 officers”	Mathematical correction	Internal
Page 124	Appendix 7	Fourth column “after Norfolk Constabulary” add “/ developer contribution”	Clarification and correction	Norfolk constabulary (11594)
Page 127	Appendix 7	On pages 127, 128 and 129, under health care facilities" correct funding sources to “health authority/developer contribution”	Clarification and correction	Internal
Page 133	Appendix 7 Column 2	Under “ promoter/delivery body" add “ GNDP to coordinate delivery involving a wide range of statutory, non statutory and voluntary bodies, and developers”	Completion	Internal
Page 135	Monitoring targets	In row entitled “Affordable housing completions” include target in column 3, “ 40% of all developments on new allocations, or above qualifying threshold where permission is first granted after adoption of this strategy”	Completion	Internal
Page 146	Appendix 8	Last section: Replace “Accreditation for” with “Use for all”	Clarification	Internal
Page 150	Glossary,	Add: “Health Impact Assessment-an assessment to judge whether a development proposals may have an impact on health or health inequality in terms of its effects on health and social care services, or wider lifestyle related considerations or factors	Clarification	Internal

Change No.	Paragraph/Policy	Proposed Change	Justification	JDI No.
		such as crime, social cohesion, movement, air pollution etc”		
Page 154 NEW	Glossary	Add : “Special Area of Conservation (SAC)- Special Areas of Conservation are defined in the European Union’s Habitats Directive(92/43/EEC), also known as the Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora. They are defined to protect the 220 habitats and approximately 1000 species listed in annex I and II of the directive which are considered to be of European interest following criteria given in the directive.”	Clarification	Internal
Page 154	Glossary	Add “Special Protection Areas (SPAs) Special Protection Areas are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive, which came into force in April 1979. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species.”	Clarification	Internal
Various	Presentational	In final document number paragraphs within policies for ease of future reference	Convenience of use	Internal

Greater Norwich Water Cycle Study summary

Reasons for the Study

The Water Cycle Study (WCS) is needed to ensure that water supply, water quality, sewerage and flood risk management issues can be addressed to enable the growth planned to 2031, making best use of existing infrastructure. It is a key part of the evidence base for the Joint Core Strategy (JCS) and is required by the East of England Plan. The study has been undertaken by consultants Scott Wilson and has involved the participation of the local authorities, the Environment Agency, Anglian Water and Natural England.

The final stage, stage 2b, is complete, subject to sign off by stakeholders. It provides a detailed strategy for infrastructure upgrades required for the chosen growth sites, ensuring:

- minimisation of adverse environmental consequences on internationally significant sites in the Broads and the Wensum, having regard to the Water Framework Directive and Habitats Directive;
- efficient use of scarce water resources.

Major issues

The draft final report for stage 2b of the WCS raised concerns relating to water supply and water quality arising from new evidence, largely emerging through the ongoing Environment Agency Review of Consents (RoC).

1. Water supply

Water supply to support the growth had not previously been considered to be a problem by the Environment Agency. The RoC (to be complete March 2010), however, will propose a “sustainability change”, reducing permitted abstractions at Costessey by about 40 million litres per day to protect water quality.

Anglian Water’s Water Resources Management Plan (WRMP), to be published imminently, will take account of the RoC. It will provide water supply solutions for future growth, but the detail of these solutions can not yet be released.

The Environment Agency and Natural England are not comfortable with signing off the Water Cycle Study ahead of publication of the RoC and WRMP, particularly as emerging evidence indicates the sustainability change may not be deliverable in the short term. The Environment Agency will need to agree compensatory arrangements in order to implement reductions to current licenses. Therefore, it is difficult at this stage to adequately conclude the Appropriate Assessment to their satisfaction.

The above issues mean that the timing and nature of a solution to water supply is currently unclear. However, a solution will not be required until later in the JCS period and it is expected that the issue can be resolved, subject to the RoC.

2. Waste water

The Habitats Directive (HD) and Water Framework Directive (WFD) impose water quality limitations. The principal issues concern phosphorus, ammonia and Biological Oxygen Demand. Strict compliance with the WFD is likely to be unachievable, particularly in terms of phosphorus, at a number of wastewater treatment works. The recommended strategy is therefore one of “planned deterioration”, i.e. utilising existing consents. This approach requires verification from the Environment Agency.

Even with this relaxation, over 1000 dwellings allocated in the strategy at Long Stratton, Reepham and Acle (see below) cannot meet HD and WFD compliance. Three potential solutions are proposed in the WCS for the 1000 dwellings:

- Amend the strategy to reallocate growth to locations with existing capacity;
- Use potentially expensive and complex innovative wastewater solutions;
- Agree at the policy level that non compliance with WFD and HD is acceptable in some cases to achieve the growth agenda. Such an interpretation of legislation cannot be agreed at the local level by the Environment Agency and needs a national policy solution. The Habitats Directive is a matter of law, and this potential solution is unlikely to be viewed favourably by Natural England.

If innovative solutions or non compliance do not prove practicable, sufficient flexibility exists within the Joint Core Strategy through over allocation of housing land to enable this growth to be relocated.

Implications for the growth strategy:

i. Specific growth locations

Innovative solutions would be required to enable growth at Reepham and for 400 of the 1800 allocated dwellings Long Stratton at the base date of 2008 (subsequent permissions may have further eroded this spare capacity). Acle can only accommodate growth if the Environment Agency accepts a small deterioration in water quality.

ii. Phasing and costs

Uncertainty also remains in relation to phasing. The study concludes new trunk sewers north and south of Norwich and within the urban area are needed. The study assumes construction of such a large scale sewer will require a considerable amount of planning lead in time as well as construction time. As a result, the majority of development within Norwich and at Easton/Costessey, Cringleford and Hethersett., could be delayed until after 2020 unless short term solutions can be found by Anglian Water. Depending on their location, this requirement may also delay delivery of the Norwich Policy Area smaller sites allowance in Broadland and South Norfolk.

This results from AW having no flexible mechanism for funding strategic infrastructure other than the AMP process, which will not enable rapid delivery of housing in the most sustainable locations. Detailed modeling of sewer capacity by Anglian Water in summer 2010 will clarify the situation.

The total cost for new strategic sewers is estimated as £44 million, with the recommendation, based on Ofwat advice, that developers should contribute a proportion of this cost as the sewers are needed as a result of new development. A proportion may be borne by Anglian Water, as the sewers may help to resolve existing difficulties in the network within the urban area.

Based on what housing delivery they think is realistically achievable in the next 5 years, Anglian Water have planned for less growth in the Greater Norwich than that planned in the Joint Core Strategy in applying for funding through the AMP process from Ofwat. Ofwat, in their funding settlement to Anglian Water, have assumed still less growth. As a result growth funding in AMP 5 (2010-2015) is very low.

It is therefore important that the GNDP enters into discussions with Anglian Water to accelerate provision of the sewers.

iii. Water policy

The present policy in the JCS sets challenging water efficiency targets to enable development. Both the study and the EA suggest amending the water efficiency policy to be even more demanding, requiring development to achieve water neutrality where possible by increasing water efficiency in existing development. Such an amendment at this stage of plan making may be difficult, but adds support for the current policy stance of exceeding current national minimum standards.

iv. Appropriate Assessment

Supplementary work is being done on the Appropriate Assessment, which appraises the likely affects of the strategy in the internationally significant sites in the Broads and the Wensum. This may have the potential to impact on the JCS, depending on the conclusions reached. Natural England must have an opportunity to agree the outcome of the appropriate assessment, or express their inability to agree it.

Next steps

At a meeting on 15th January, the following was agreed to enable progression on the JCS:

- Natural England, Anglian Water, Environment Agency and the Broads Authority will produce position statements by late January;
- In light of these, the GNDP (or the constituent authorities if the responses are not received by the Policy Group meeting) will need to consider whether to vary the Joint Core Strategy or proceed to submission. Varying the strategy might require some additional focused consultation;
- The completed Water Cycle Study, with decisions on sign off by stakeholders, will be available to the constituent authorities when considering submission of the Joint Core Strategy

Policy Recommendations and responses

The WCS makes policy recommendations. These, along with the GNDPs responses, are in table 1 below:

WCS recommendation	Policy response
1: Development Phasing New homes should not be built until agreement has been reached with the water and wastewater provider that sufficient capacity in existing or future water services infrastructure is available in accordance with the GNWCS.	Joint Core Strategy policy 3
2: Developer Contribution As well as connection fees required under the Water Industry Act, developers will be required to contribute to strategic wastewater network infrastructure required specifically to service new development areas proposed in the GNDP Joint Core Strategy.	Joint Core Strategy policy 3 and text
3: Strategic Wastewater Network A new strategic wastewater interceptor main will be required around the north and south of Norwich to connect new development areas and transfer much of the wastewater generated to Whitlingham WwTW for treatment.	Joint Core Strategy policy 3 and text
4: Strategic Wastewater Treatment Upgrades to wastewater treatment facilities are required in order for demands of future growth to be met without causing a failure in statutory WFD or standards or HD standards. Expansion of some works may be required.	Joint Core Strategy policy 3 and text
5: Protection of Amenity Development will only be permitted adjacent to WwTW only if the distance between the works is sufficient to allow adequate odour dispersion.	Forthcoming Development Management DPDs
6: Water Efficiency All new houses within developments of less than 500 homes should be designed to have a water demand in keeping with levels 3 & 4 in the Code for Sustainable Homes. For developments of greater than 500 homes, houses will be expected to have a water demand in keeping with levels 5 & 6 of the Code for Sustainable Homes. (This advice may be strengthened to require water neutrality to enable development to comply with the WFD and HD)	Joint Core Strategy policy 3 and text (strengthening of policy may be necessary through the Examination)
7: Protection of Water Resources New development will not be permitted in source protection zones unless the Environment Agency is satisfied that the risk is acceptable.	Forthcoming Development Management DPDs
8: Site drainage All new development should be served by separate surface water and wastewater drainage.	Forthcoming Development Management DPDs
9: Surface Water Management All new development must manage surface water runoff in line with PPS25	Forthcoming Development Management DPDs, taking account of the forthcoming Norwich Surface Water Management Plan

NDR press release

First step for £90.7 million road scheme in Norfolk

16 December 2009 11:54

A vital £90.7m scheme to regenerate Norfolk, tackle congestion and boost economic growth by greatly improving transport links in the area was given the go-ahead today by Transport Minister Sadiq Khan.

The Department for Transport has indicated it will invest up to £67.5m for Norfolk County Council to deliver a new road to help relieve congestion on the inner and outer ring roads and other key routes in Norwich.

The Norwich Northern Distributor Route will help provide better access to employment locations and proposed new housing growth areas, including the proposed eco-town at Rackheath - as set out in the draft core strategy for the Greater Norwich development area. The scheme will provide 8.7 miles of new dual carriageway running from Postwick to the A140 at Norwich International Airport. This will bring faster, more reliable journeys and help attract business, visitors and investment to the area.

The Government is also today confirming the release of the £21m reserved for the Postwick Hub improvement scheme in the Communities and Local Government / Department for Transport Community Infrastructure Fund announced earlier this year. Sadiq Khan said:

“This Government is committed to investing in key transport links which help boost economic growth. We have agreed to provide significant investment to allow Norfolk County Council to deliver vital improvements which will support jobs, encourage economic growth and attract further investment to the area.

“This scheme will provide improved access to the North and North East of Norwich, including improving connections to the strategic road network via the A47 and A11. It will also improve access to employment locations and will help Norfolk deliver wider proposals for pedestrianisation, bus priority measures and strategic growth in and around Norwich.

“The £21m Community Infrastructure Fund investment for the proposed improvements at Postwick Hub will deliver an improved junction at Postwick, increased park and ride capacity and provide the potential to unlock sites for up to 1,600 homes, reflecting the Government’s commitment to supporting growth in Norfolk.”

Notes to Editors:
Norwich Northern Distributor Route

The Norwich Northern Distributor Route is a local major road scheme being promoted by Norfolk County Council, as local highway authority. Today's announcement grants the scheme 'Programme Entry' status in line with the Department for Transport's local major scheme guidance approval process. The next steps in the process would be for Norfolk County Council to take the scheme through the necessary statutory process. The scheme that we are awarding initial funding approval is a shorter version of the scheme that Norfolk County Council has been promoting.

This scheme is a 14km (8.7 miles) dual carriageway from Postwick to the A140 at Norwich International Airport and is estimated to cost £90.7m with a contribution of up to £67.5 million from the Department, subject to Norfolk meeting a number of conditions, including successful completion of the necessary statutory powers.

Norfolk hope the scheme will be able to commence construction in early 2013 and to be completed in 2015.

Postwick Hub Community Infrastructure Fund (CIF) Scheme

Following Norfolk County Council submitting a Business Case for CIF funding to the Government in October 2008, we jointly announced in March 2009 with the Department for Communities and Local Government that we were minded to accept funding for a number of Community Infrastructure Schemes, including the Postwick Hub Interchange scheme.

The Community Infrastructure Funding is a dual-key capital fund and provides financial support for small and medium scale transport schemes necessary to unlock housing sites and housing growth potential in the Growth Areas. Our March announcement explained that whilst the Government were minded to provide funding of £21m towards the Postwick Hub Interchange scheme we would not be able to release the funds until the outcome of our assessment of the proposed Norwich Northern Distributor Road was completed. By granting initial funding approval today, we are also agreeing to release funding to Norfolk County Council, subject to the completion of the necessary statutory powers required.

The Postwick scheme consists of providing improvements to the junction at Postwick, enabling increased capacity of the associated Park and Ride site and providing the potential to unlock sites for 600 homes with the potential for another 1000 homes at a later date. Norfolk is hoping to commence construction for this scheme in February 2010.

Appendix 4
Joint Core Strategy Report
Recommendation for Submission

Joint Core Strategy
Transport Evidence Report

This document will be mailed under separate cover



Greater Norwich Housing Market Executive Summary

UPDATE

November 2009

EXECUTIVE SUMMARY

This report updates the Greater Norwich Housing Market Assessment published by the Greater Norwich Housing Partnership in September 2007. It is based on the findings focus groups held in April 2009 and on re-calculating housing need using the same methodology as Opinion Research Services (published in June 2006).

The construction of new homes peaked in 2007/08, and developers are wary of building in the current housing market.

By quarter 2 of 2009 house prices had fallen by 18% since their peak in quarter 3 of 2007, leaving them back at their 2006 level. Future prices will be influenced by market confidence and the availability of mortgages, especially for first time buyers.

Private sector rents fell by 7.2% between 2006 and 2009. There is a surplus of some property types, especially flats near Norwich City Centre.

715 affordable homes were completed in Greater Norwich in 2008/09. It is likely that completions will be fewer in 2009/10 and 2010/11. Between April 2008 and April 2009 there was a significant increase in the number of applicants for affordable housing.

Overall 5 year housing requirement across the sub-region has increased by 9.97% from 9,691 to 10,659 across the sub-region. Only once in the last 5 years has the number of dwellings completed exceeded the requirement target within the housing market assessment and this is leading to an increased pressure on housing waiting lists across the sub-region.

The overall housing need as a percentage of housing requirement remains at 43.4% across the sub-region, now 925 per annum.

Joint Core Strategy: Responses to Key Challenges at the Publication Stage

Policy/Area of Challenge	Key Challenge	Summary response
Legal Compliance (Process)	1. Lack of transparency in decision making.	<ul style="list-style-type: none"> • The Greater Norwich Development Partnership (GNDP) was established as an informal partnership of Broadland, the City of Norwich, South Norfolk and Norfolk County Councils to implement the requirement of the Regional Spatial Strategy for a joint approach to the planning for Norwich and its surrounding area. • The production of policies by the partnership was informed by a group of officers from each local authority backed by evidence studies and the results of technical and public consultations. This was overseen by informal meetings of the GNDP Policy Group comprising appropriate Cabinet Members of the GNDP local authorities. • The decisions on the adoption of policies were taken by the GNDP local authorities through their individual council Cabinet and full Council meetings. • The public was made aware of the successive stages of decision making through the publication of agendas for the Cabinet and full Council meetings.
	2. Mismatch between Sustainability Appraisal and Strategy	<ul style="list-style-type: none"> • Sustainability appraisals are intended to examine the social, economic and environmental impacts of proposed policies to inform their potential suitability as a basis for sustainable development. • The values applied to the positive and negative impacts identified by such appraisals are intended to inform but not

Policy/Area of Challenge	Key Challenge	Summary response
		<p>specify the choice of policies and overall strategy.</p> <ul style="list-style-type: none"> The choice of policies and overall strategy for growth in the Joint Core Strategy is the result of an interpretation of the sustainability appraisal outcomes, technical and public consultations, continually emerging new evidence and the consideration by elected Members of growth options in the above context.
	3. Late appearance of Water and Energy designs and policies	<ul style="list-style-type: none"> Following the Regulation 25 Technical Consultation (August 2008), officers and elected Members considered that the policy emphasis on the overall need to address climate change and the need to make the most efficient use of energy, water and natural resources required updating as a result of rapidly changing government policy, in addition to improvements to other policies to promote sustainable development, place shaping, and local distinctiveness. Most of these issues had been addressed in the Technical Consultation strategy but in a less focused way. The Regulation 25 Public Consultation (March 2009) strategy (paras. 8.1/8.2) referred to the need to provide for a local energy study to inform an energy plan and set local energy standards and the need for an overarching policy. However the supporting evidence studies to justify the specific policy requirements for energy conservation had not been completed at this stage because their methodology depended on the publication of the necessary government advice for such studies to meet the

Policy/Area of Challenge	Key Challenge	Summary response
		<p>requirements of government policies in PPS 1 “Planning and Climate Change – Supplement to Planning Policy Statement 1 (December 2007)”.</p> <ul style="list-style-type: none"> Although The Water Cycle Study Stage 1 was started in 2007, i.e. before the relevant Environmental Agency guidance was published in January 2009, the scope of the subsequent studies has required ongoing work that has revealed that water efficiency will be a key requirement to enable delivery of the proposed growth.
Internal inconsistencies of strategy	1. Climate/Environment (CO2 targets) v. Growth/Road infrastructure	<ul style="list-style-type: none"> Strategies will always have policy aims that may be in conflict. The intention is to provide for growth and change in the most sustainable manner. The impacts of the strategy’s provisions for growth and new roads have to be considered as a whole. The Joint Core Strategy and the Norwich Area Transportation Strategy (NATS) promote a range of transportation measures to accommodate the increased demand for travel that will inevitably arise from significant growth. The measures are a range of public transport enhancement, improved walking and cycling opportunities and road building and capacity improvements to the existing road network. NATS provisions are intended to produce a combination of environmental and sustainable transport benefits for both existing and new populations, and to meet the

Policy/Area of Challenge	Key Challenge	Summary response
		<p>requirement to deliver a major shift towards public transport as stated in Policy NR1 of the East of England Plan. Additional transport modelling work has been carried out to clarify the benefits of the Northern Distributor Road. These will include environmental benefits and the potential to free up existing road space in Norwich for the enhancement of public transport, walking and cycling. A Long Stratton bypass already has planning permission.</p>
Evidence base	1. Incomplete WCS; Appropriate Assessment; NATS justification/modelling	<ul style="list-style-type: none"> • Although The Water Cycle Study Stage 1 was started in 2007, i.e. before the relevant Environmental Agency guidance was published in January 2009, the scope of the subsequent studies has required ongoing work that has revealed new issues that are still to be resolved. • The Water Cycle Study has involved a multi-stage approach involving several iterations to advise on the broad suitability of general locations for growth, the suitability of specific locations for growth and the specific infrastructure requirements to provide for the preferred growth option. • The outcomes of this study have been affected by the uncertainties affecting water supply and effluent treatment and disposal arising from the ongoing review of Consents by the Environment Agency, and uncertainties arising from the timing of the Anglia Water Asset Management Plans and the Anglia Water Resources Management Plan

Policy/Area of Challenge	Key Challenge	Summary response
		<p>(WRMP). The review of Consents is due to be finalised in March 2010. The WRMP is not due to be published until later in 2010.</p> <ul style="list-style-type: none"> • The Appropriate Assessment must acknowledge the above uncertainties. In these circumstances, Natural England may be unable to sign this off. • Additional transport modelling work has been carried out to better understand the effects of the likely NATS implementation package and the relationship of the Northern Distributor Road to the package of proposed sustainable transport measures and the chosen growth option. This work has taken additional time to complete, in part as a consequence of the carrying out of extra work for the Department for Transport to support "Programme Entry" (i.e. for consideration in the relevant Regional Funding Allocation).
Deliverability	1. Lack of detail in Implementation Schedule and challenges to the costs apportionment.	<ul style="list-style-type: none"> • The Implementation Schedule is intended to provide an indication of the requirements for and provision of the necessary services and facilities. This information is being clarified in the associated Integrated Development Programme. This will provide a basis for discussions with services and infrastructure providers to establish the final costs and implications of infrastructure delivery. Any proposed Community Infrastructure Levy (CIL) would need to be the subject of a separate submission and examination. Early consultations by the Government on a

Policy/Area of Challenge	Key Challenge	Summary response
		CIL recognised that a decision at this stage is likely to be impossible.
	2. Dispersal of growth in South Norfolk makes delivery of “big infrastructure” harder	<ul style="list-style-type: none"> Evidence based on the “Greater Norwich Infrastructure Needs and Funding Study”(2009) suggests that the necessary infrastructure can be provided. The detailed delivery of the required infrastructure will be confirmed in the Integrated Development Programme.
	3. Some of NE development could proceed before additional (particularly road) infrastructure	<ul style="list-style-type: none"> The intention of the strategy is that the development area to the north east should be developed in a coordinated approach dependent upon a commitment to the delivery of the Northern Distributor Road. A fragmented approach would be unlikely to provide satisfactorily for other high level infrastructure such as green infrastructure, secondary education, renewable energy, or that required for sustainable transport.
	4. A lack of flexibility of the strategy to accommodate the proposed growth if major infrastructure requirements such as the Northern Distributor Road are delayed or not delivered..	<ul style="list-style-type: none"> It is accepted that there remains some uncertainty over the provision of major infrastructure. This is to be expected. However uncertainty will be managed through the Integrated Development Plan process, through the development of the appropriate delivery arrangements, and further development funding options such as the CIL. The strategy does include some flexibility to deal with delayed delivery by over allocating land for housing and employment development. The strategy also provides for housing growth in significant locations as minimum targets, thus allowing for a degree of additional

Policy/Area of Challenge	Key Challenge	Summary response
		<p>development through applications and allocations to deal with delays elsewhere.</p> <ul style="list-style-type: none"> • The Northern Distributor Road (NDR) has recently gained “Programme Entry”. As with any significant infrastructure project there is always some uncertainty over the precise delivery on the scheme. The NDR now has greater certainty over funding and is promoted in the County Council’s 2nd Local Transport Plan and the Regional Spatial Strategy. There is a clear timetable for the next stage of statutory process. Should the NDR not proceed, there would need to be a fundamental review of the spatial distribution of growth promoted in the JCS.
	5. Deliverability of Long Stratton	<ul style="list-style-type: none"> • The major landowners to the east of the village have supported the proposed submission version of the Joint Core strategy in terms of the level of growth at Long Stratton, the need for growth to be accompanied by a bypass, and policies relating to the economy, access and transportation, supporting communities and implementation. • A number of sites to the west of the village have also been proposed. • The Water Cycle Study indicates that growth above 1400 dwellings can only be accommodated if innovative solutions that meet the requirements of the Water Framework Directive and Habitats Directive are to be implemented.

Policy/Area of Challenge	Key Challenge	Summary response
		<ul style="list-style-type: none"> The 1800 units total is a minimum allocation. However further increases could trigger other significant infrastructure including the need for a new/relocated high school, and have additional impacts on unimproved sections of the A140.
	6. Deliverability of water infrastructure (EA)	<ul style="list-style-type: none"> The Water Cycle Study has identified issues regarding the availability of water related infrastructure which could have implications for the provisions for new development. These issues remain to be resolved as soon as possible in association with the Environment Agency, Anglian Water and Natural England. See the attached appendix addressing this issue.
Policy 3: Energy and Water	1. Justification and viability of water and energy policies	<ul style="list-style-type: none"> The policies are considered to support the requirements of government policy in PPS 1 “Planning and Climate Change – Supplement to Planning Policy Statement 1 (December 2007)” and East of England Plan Policies ENG 1, ENG 2 and WAT 1, within the context of the outcomes of the relevant evidence studies. Further evidence has increasingly supported the need for the water-related policies.
	2. Challenges to design policy	<ul style="list-style-type: none"> Objections relate to the interpretation of the CABE “Building for Life” criteria. The strategy is considered to be justified in requiring compliance with a defined set of standards. It is considered that all settlements defined by the strategy as being suitable for new housing land

Policy/Area of Challenge	Key Challenge	Summary response
		allocations enable development to meet the standards required.
	3. EA want tougher water targets	<ul style="list-style-type: none"> • The Water Cycle Study supports standards above the national levels. (See the attached appendix addressing this issue).
Policy 4 : Housing delivery	1. Viability and justification of Affordable Housing targets (Blyth Valley)	<ul style="list-style-type: none"> • Objections relate to the impact of the viability of new housing of the requirement for a 40% affordable housing requirement where developers are also required to financially provide for a range of other development-related services and infrastructure requirements. • The Blyth Valley reference refers to a high court appeal to oppose a 30% affordable housing requirement for all new developments of ten or more dwellings in the Blyth Valley Core Strategy. This policy had previously been considered to be “sound”, but was subsequently declared to be “unsound” on the basis that the Government Planning Inspector had failed to consider the economic viability of the policy. • Evidence from local housing needs assessments suggests that 43% affordable housing should be a requirement over the Joint Core Strategy area, but local experience has shown that 40% is the maximum achievable without a public subsidy. • The “Greater Norwich Infrastructure Needs and Funding Study” (2009) accepted the proposed 40% affordable housing target in its assessment of housing development

Policy/Area of Challenge	Key Challenge	Summary response
		<p>trajectories and associated infrastructure provisions, and its assessment of the potential for “land value capture”. This also took account of varying assumptions about the housing market.</p> <ul style="list-style-type: none"> • More detailed work has been done in relation to where the prevalence of brown field sites means that viability is a more acute issue. • The strategy accepts that viability may be an issue. Therefore Policy 4 makes clear that “In negotiating the proportion and tenure of affordable housing, account will be taken of site characteristics and the economic viability of provision.” • Therefore it is considered that the policy provides for the appropriate consideration of the affordable housing target.
Policies 9 (Strategy for Growth in the NPA) & 10 (Locations for-- --)	1. Challenges to Long Stratton and Easton in particular	<ul style="list-style-type: none"> • The overall strategy for growth in the Joint Core Strategy is the result of an interpretation of sustainability appraisal outcomes, technical and public consultations, continually emerging new evidence, and the consideration by elected Members of growth options in the above context. • The rationale behind the consideration and selection of the area is set out in the topic paper “Strategy to Accommodate Major Housing Growth in the Norwich Policy Area”.

Policy/Area of Challenge	Key Challenge	Summary response
	2. Promotion of more growth elsewhere especially Wymondham & Hethersett	<ul style="list-style-type: none"> • The overall strategy for growth in the Joint Core Strategy is the result of an interpretation of sustainability appraisal outcomes, technical and public consultations, continually emerging new evidence, and the consideration by elected Members of growth options within this context. • The rationale behind the consideration and selection of the area is set out in the topic paper “Strategy to Accommodate Major Housing Growth in the Norwich Policy Area”.
	3. Challenges to NE – Scale, nature, better alternatives, rates of development not achievable, dispersal preferable	<ul style="list-style-type: none"> • The strategy provides for the major growth area to the north east to be developed in a single coordinated approach dependent upon the delivery of the Northern Distributor Road. • The rationale behind the consideration and selection of the area is set out in the topic paper “Strategy to Accommodate Major Housing Growth in the Norwich Policy Area”.
	4. Need more clarity on locations for “floating” allocations	<ul style="list-style-type: none"> • The small sites allowance is specifically intended to provide some flexibility. The strategy makes it clear that sites will be selected in accordance with the Settlement Hierarchy.
Policies 13-17	1. Insufficient consideration of role of Market Towns especially Diss (and its boundary issues)	<ul style="list-style-type: none"> • The identification of the market towns was based on a long standing context including previous local plans and policies of the Norfolk Structure Plan (1999). The

Policy/Area of Challenge	Key Challenge	Summary response
		<p>proposed scales of growth reflect the policies of the East of England Plan.</p> <ul style="list-style-type: none"> • Market town functions were acknowledged by their inclusion in two studies. The Norwich Sub-Region Retail and Town Centres Study (2007) examined the vitality and viability of their centres and their potential for retail and leisure growth. The Greater Norwich Employment Growth and Sites and Premises Study (2008) examines their wider economic role. The strategy reflects this evidence. • The provisions for Diss reflect its role and extensive rural catchment. Its location on the County boundary was considered to mean that larger scale growth could require development across the boundary in Suffolk which would not contribute towards the growth to be provided for by the strategy. However this issue was not formally addressed. • South Norfolk Council could consider more detailed strategy development through subsidiary local development documents and is currently producing an Area Action Plan to inform the implementation of development in a central part of Diss.
	<p>2. Unclear rationale for housing numbers in towns, KSCs, Service villages etc.</p>	<ul style="list-style-type: none"> • The East of England Plan provided for most growth to be focused on the Norwich Policy Area which is expected to accommodate some 89%-92% of growth. The strategy apportions the remaining growth to locations reflecting their positions in the Settlement Hierarchy and known local constraints and services provision.

Policy/Area of Challenge	Key Challenge	Summary response
		<ul style="list-style-type: none"> The rationale behind the provisions for growth in the Settlement Hierarchy is referred to in the “Settlement Hierarchy” topic paper.
	3. Inconsistent approach to hierarchy between Broadland and SNC	<ul style="list-style-type: none"> The settlement hierarchy reflects the significantly differing distributions of population and places within the districts of Broadland and South Norfolk as referred to in the Settlement Hierarchy topic paper. Broadland has a greater proportion of its population within the Norwich fringe parishes within the Norwich built-up area resulting in fewer significant settlements and a range of relatively small villages elsewhere. South Norfolk district has a greater number of settlements including many villages serving local catchments with much less of a social and economic dependency on Norwich. The review of the villages categories to provide for local flexibility arising from the Regulation 25 Technical Consultation is detailed in the above topic paper. The Broadland and South Norfolk “Service Villages” provide broadly similar ranges of services. The much smaller number of Broadland “Other Villages” albeit with relatively high services provisions reflects the numbers and distribution of large and small villages within that district.