Report to
Cabinet
11 December 2013

Report of
Deputy chief executive (operations)

Adoption of JCS for Broadland, Norwich and South Norfolk, the Broadland part of the Norwich Policy Area Local Plan

KEY DECISION

Purpose

To inform members of the outcome of the examination into the Broadland part of the Norwich Policy Area Local Plan (the part Joint Core Strategy)

Recommendation

To recommend council to:

- 1) note the inspector's report (in annex 1) including the required changes;
- 2) resolve to adopt the part Joint Core Strategy (JCS) and changes to the existing JCS (as set out in annex 2);
- 3) delegate authority to the deputy chief executive to proceed with the necessary legal and administrative process to secure adoption of the revised JCS so that it becomes part of the development plan for Norwich City Council, subject to Broadland District Council and South Norfolk Council also resolving to adopt.

Corporate and service priorities

The report helps to meet the corporate priority "a prosperous city" and the service plan priority to develop the local economy, promote inward investment and regeneration activities.

Financial implications

The costs of adopting and publishing the JCS are covered within existing budgets.

Ward/s All wards

Cabinet member Councillor Arthur - Leader

Contact officers

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Background documents

None

Report

Introduction

- The report by an independent Inspector, David Vickery, into the soundness and legal compliance of the JCS for Broadland, Norwich and South Norfolk, the Broadland part of the Norwich Policy Area Local Plan (the part JCS) has been received.
- The report concludes that, subject to modifications recommended by the Inspector being incorporated into the plan, the part JCS strategy is sound and can be adopted as part of the already adopted wider JCS for Broadland, Norwich and South Norfolk (JCS).
- 3. This report summarises the inspector's conclusions and proposes that cabinet recommends that council resolves to adopt the plan and the changes to the existing JCS proposed for adoption.
- Annex 2 contains the Schedule of adopted content of the part JCS. This
 includes the inspector's modifications. It is the text this report recommends for
 adoption, to be inserted into the adopted JCS.

Background

- 5. The JCS was adopted by the councils in March 2011. Following its adoption the JCS was subject to legal challenge on a number of grounds by Mr. Stephen Heard of Stop Norwich Urbanisation (SNUB). Most of the grounds for challenge failed. However one challenge, which related to how reasonable alternatives for the major growth proposed in the Broadland part of the Norwich Policy Area (NPA) had been reported, succeeded at the High Court in 2012.
- 6. As a result of this judgment the court ordered that parts of the JCS should be remitted and not be treated as adopted. The remitted parts of the JCS related to certain major growth proposals in the Broadland part of the NPA, specifically the proposals for at least 7,000 homes¹ and 25 hectares of employment land in the Old Catton, Sprowston, Rackheath and Thorpe St. Andrew growth triangle, also known as the North East Growth Triangle (NEGT). The remittal also covered 2,000 further homes which formed a "floating allowance" in the Broadland part of the NPA.
- 7. The court order specified the text and diagrams to be remitted from the JCS and some consequential amendments to the Policies Map of Broadland District Council. The order made clear that the remitted elements were not to be treated as having been adopted but were to be considered as having been taken up to the Regulation 19 publication stage.

¹ Rising to 10,000 after 2026

- 8. The court order also specified a process to be followed as a result of the judgment. In summary, this process involved the councils:
 - a) Preparing a sustainability appraisal (SA) of the remitted parts of the JCS, taking into account in particular the strategic growth in the NEGT and the reasonable alternatives, if any, to this;
 - b) Following consideration of the SA, publishing the relevant parts of the JCS and submission documents for consultation;
 - c) Following consideration of representations, either to submit the relevant parts of the JCS (including the SA and representations received on it) to the Secretary of State for Examination, or withdraw the remitted parts of the JCS:
 - d) Following any examination, to consider whether or not to adopt the relevant parts of the JCS in the light of the inspector's report and recommendations.
- The court order created an unprecedented and unique situation whereby the JCS remained adopted in its entirety for Norwich, South Norfolk and the parts of Broadland outside the NPA, but remitted some of the elements that had been adopted in the Broadland NPA.
- 10. The process that has been followed since has been carried out in accordance with the court order.
- 11. Work commenced on the SA shortly following the publication of the court order in spring 2012. This resulted in the identification and evaluation of the reasonable alternatives for growth, one of which was the previously remitted growth proposal.
- 12. Following consideration of the SA, it was decided that reasonable alternative 1, the previously remitted growth proposal, remained the most appropriate and should be published for consultation. The consultation ran for a total of 12 weeks from 10 August to 2 November 2012.
- 13. Following consideration of the representations made on both the text proposed for inclusion in the JCS and the SA, the councils resolved to submit the plans for examination.
- 14. Submission took place on 4 February 2013. David Vickery (Dip. T+CP, MRTPI) was the appointed inspector. Examinations hearings were held between 21 and 23 May and on 24 and 25 July. Consultation on suggested main modifications took place between 9 September and 21 October. The inspector's report was received on 13 November.
- 15. The inspector's report concludes that with certain modifications the plan satisfies legal requirements and meets the criteria for soundness in the National Planning Policy Framework. The councils must now consider whether or not to

adopt it, in the light of the inspector's report and recommendations, in accordance with the court order.

The inspector's report

16. The Inspector's report, with the exception of the schedule of Main Modifications, is attached as annex 1. The schedule of Main Modifications has been incorporated into the proposed schedule of content to be adopted attached as annex 2. The report deals with legal compliance, soundness and other issues as summarised below.

1. Legal Compliance

- 17. The Inspector's report in appendix 1 concludes that the plan meets all **legal requirements.** Specifically, the report states that:
 - a) The councils have complied with the **duty to cooperate** with neighbouring local authorities and statutory consultees;
 - b) The **public consultation** requirements for the plan were "fully and properly carried out. The plan complied with all UK legislation in this regard." Further to this, the Inspector states "the GNDP made a commendable effort to explain a complex matter in a short format to all relevant interested parties, particularly to members of the public".
 - c) The **sustainability appraisal (SA)**, with its addendum, has been properly and correctly carried out. The Inspector supported the approach taken in the SA for identifying three "reasonable alternatives" for the location of 7, 000 dwellings and 25 hectares of employment land. The report states the SA carried out this difficult task "rigorously, logically and clearly" and provides "clear reasons" why the north-east was chosen as the most appropriate location for the growth. The Inspector concluded that as the Northern Distributor Road (NDR) is an adopted scheme, it is essential to take account of it in assessing the best location for growth. The Inspector did not consider that other locations proposed by objectors for this growth, such as Acle and the south-west, including Wymondham, were supported by evidence that they could be delivered and thus were not "reasonable alternatives". The Inspector supported the view presented in the SA that school capacity, landscape setting and historical character issues constrained additional growth in the south-west. The issue of properly assessing greenhouse gas emissions in selecting the most appropriate location for the growth was considered at the Examination. The Inspector concluded that the addendum to the SA produced to address this issue clearly shows how the three alternative growth locations perform and why the north-east is the best choice in relation to greenhouse gas emissions. Importantly, the Inspector concluded that the SA rectifies the deficiencies identified in the 2012 Court Judgment and complies with the Court Order.

2. Soundness

- 18. The Inspector identified three main "**soundness**" issues to be investigated at the Examination and concludes:
 - If the modifications he recommends are made, the **housing numbers**, locations and trajectory are sound. There was considerable debate on the issue of overall housing numbers at the examination, with some arguing for lower numbers and some for higher. The inspector concludes that adopted JCS total does not need to be changed as it "lies comfortably within a range of various projections" and accepted the GNDP view that a future review of the adopted JCS would be appropriate if monitoring showed a problem in relation to this issue. The modifications include a flexibility policy requiring a focussed local plan to allocate additional housing land in the NPA in the event of under delivery of housing over the next two years (policy 22 in the inspector's report). The Inspector draws the important planning conclusion that there has not been "persistent under delivery" of housing in the NPA and that a 5 % land supply buffer, rather than one of 20%, is appropriate for the area. The inspector also concludes that the development proposed will be viable and that there is a high probability that key infrastructure, including the NDR and Postwick Hub, will be implemented.
 - The allocation of 25 hectares of employment land made in the part JCS is reasonable;
 - Modifications should be made to enable effective monitoring of the plan.

3. Other issues

19. The inspector also concludes that issues raised at the examination concerning flooding and water had not been backed by evidence and there are no reasons why the plan would cause any of the alleged problems. In relation to traffic in Wroxham and Hoveton, the inspector concludes that there was no evidence that the plan would create a danger to highway safety or significantly interrupt the free flow of traffic.

Consequences of the report

- 20. The publication of the inspector's report enables the councils to proceed to adoption of the part JCS. However, they can only do so provided that they incorporate the modifications that the Inspector viewed as necessary to make the plan sound. Although all the modifications proposed by the inspector relate to the remitted proposals, it should be noted that they require both new text to be included in the plan that was not submitted by the councils and some degree of change to parts of the plan previously adopted and not remitted.
- 21. The modifications have all been subject to consultation. Almost all of them were proposed by the councils at the examination. They are summarised as follows:

- Clarification of the amount of development that can be permitted before the NDR is constructed and/or without the improvements planned for the Postwick Hub junction;
- Including the national "model" policy confirming the presumption in favour of sustainable development;
- Including a new flexibility policy to ensure the delivery of housing land in the Broadland part of the Norwich Policy Area in the event of a significant shortfall;
- Revising the appendix 6 housing trajectory to accord with up-to-date figures and to explain how the tables and charts should be read;
- Updating and clarification of the appendix 7 implementation framework, adding a separate section for the infrastructure required for this plan; and
- Additional indicators for the appendix 8 monitoring framework to ensure that it is effective.
- 22. The modification that was not proposed by the councils is the inclusion of policy 22 (see pages 48 and 49 in annex 2). The policy requires that if there is a significant shortfall of housing supply affecting the Broadland part of the NPA shown in monitoring reports produced two years following adoption, the councils will produce a focussed local plan identifying appropriate sites in the whole of the NPA to remedy the shortfall.
- 23. In its consultation on representations on the draft version of policy 22, the councils' suggested that the soundness of the policy would be enhanced by:
 - Changing the period before the policy could be triggered to three years to encourage investment in the implementation of the JCS;
 - Increased clarity with respect to the trigger point and
 - Including reference to the housing land supply over the entire NPA being relevant to the scale of the shortfall to be addressed in any review.
- 24. Only very limited amendment was made between the versions of policy 22 consulted on and those included in the final inspector's report. The inspector did not make any significant change to reflect the councils' concerns, although to some extent further helpful explanation is provided in the body of the report.
- 25. Notwithstanding the outstanding concerns over the content of policy 22, it is considered that the case for adoption is overwhelming. The councils' strategy for the distribution of growth over the NPA has been endorsed. The major growth in the Broadland part of the NPA fits into a coherent strategy which if implemented should ensure that housing needs are addressed, economic development is promoted, the environment is protected and infrastructure investment is well coordinated with growth.
- 26. Furthermore, there could potentially be some very serious negative impacts associated with not adopting the plan. This would include creating considerable confusion about appropriate growth locations and the status of the remaining parts of the JCS. The uncertainty created by not having an adopted strategy

would increase the prospect of speculative or inappropriate proposals being submitted, resulting in "planning by appeal".

The Next Steps

- 27. The adoption of the part JCS will be formally considered separately by the three councils between November 2013 and December 2014. Assuming all agree to adopt, it is proposed to publish formal notices of adoption as soon as possible following resolution of the final council.
- 28. Adoption of the part JCS involves the publication of an adoption statement, accompanied by the full JCS, the part JCS as amended by the inspector's modifications, the inspector's report, the sustainability appraisal, the habitats regulation assessment and an environmental statement. These documents will be made available for inspection at deposit points and on the web for a six week "challenge period".
- 29. Any person who is aggrieved by the adoption of the part JCS may make an application to the High Court on the grounds that the document is not within the appropriate power and/or a procedural requirement has not been complied with.
- 30. Once the risk of legal challenge has passed, the production of the final document to publication standard can be undertaken.

Conclusion

31. Overall, the inspector's report is very positive. It provides the opportunity to finally adopt a full, evidence-based strategy to guide the sustainable growth of the area, providing the planning framework to guide delivery of the housing and jobs needed. However, the inspector is clear that the plan can only be adopted if the recommended modifications are made. It is therefore proposed that cabinet recommends that council should resolve to adopt the strategy with the modifications proposed by the inspector.

Annexes:

- Inspector's Report
 Schedule of proposed content for adoption



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

by David Vickery DipT&CP MRTPI

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

Date: 13th November 2013

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)
SECTION 20

REPORT ON THE EXAMINATION INTO THE JCS FOR BROADLAND, NORWICH AND SOUTH NORFOLK, THE BROADLAND PART OF THE NORWICH POLICY AREA LOCAL PLAN

Document submitted for examination on 4 February 2013

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

File Ref: PINS/G2625/429/7

Abbreviations Used in this Report

Framework National Planning Policy Framework

GNDP Greater Norwich Development Partnership, which includes

Broadland District Council, Norwich City Council and South Norfolk District Council (the three councils with responsibility for

this Plan)

JCS JCS

LDS Local Development Scheme

LIPP Local Investment Plan and Programme

LPA Local Planning Authority

LP Local Plan

MM Main Modification

NDR Northern Distributor Road NEGT North East Growth Triangle

NPA Norwich Policy Area
PUD Persistent Under Delivery
SA Sustainability Appraisal

SCI Statement of Community Involvement SCS Sustainable Community Strategy SHMA Strategic Housing Market Assessment

Non-Technical Summary

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

The Main Modifications can be summarised as follows:

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

Introduction

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

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

Preamble

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

Assessment of Legal Compliance

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

Duty to Co-operate

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

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

Public consultation

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

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

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

Sustainability Appraisal

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

but, for the avoidance of doubt, I agree with the GNDP's reasons as set out in SDJCS 7 for the unfavourable assessments of the other suggestions made by representors.

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

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

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

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

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

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

Assessment of Soundness

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

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

Overall level and location of housing

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

- associated employment (25 hectares).
- 39. The GNDP carried out an assessment of housing numbers to test whether the requirements of the adopted JCS were still valid [SDJCS 14 and 14.1], including the latest Government Household Interim Projections of April 2013 [TP 13]. This concluded that local evidence (including an update to the Strategic Housing Market Assessment calculations) showed that the adopted JCS housing provision still sat well within the latest regional and national population projections and a range of estimates of housing requirements. The GNDP also provided the latest (July 2013) update to the East of England Forecasting Model, an economic forecasting tool [DV 36] which produced figures at the lower end of the range.
- 40. This conclusion on housing numbers was challenged by various parties, some arguing for lower and some for higher numbers. However, I am not convinced that the adopted JCS figure is so wrong that the amounts of housing proposed in this Plan need to be reduced or increased. This is not an exact science, and population projections are just that projections. The GNDP figures indicate that the adopted JCS total still lies comfortably within the range of various projections based on completion extrapolations, affordable housing requirements, and population and economic figures [Table 1 of SDJCS 14 and TP 13].
- 41. Windfall housing development is not included within the adopted JCS 37,000 homes total, and it cannot be included because no evidence was submitted to show that it will continue to be a reliable source of supply as required by paragraph 48 of the Framework. I accept that windfall development would make the housing total higher if it continues at current rates (Table 1 of SDJCS 14 estimated that it would result in 42,000 homes). I also accept that the adopted JCS housing total does not lie at the bottom end of the range of projections. However, housing targets are not a maximum number, and the Government's policy in the Framework is to boost significantly the supply of housing (paragraph 47). Moreover, there is no evidence to indicate that there are good planning reasons to restrict the proposed housing numbers in the Plan area, even if windfall development is included.
- 42. It was alleged that there was a backlog or shortfall in the provision of housing numbers in the adopted JCS that had to be made up in this Plan. I have already referred above to the possibility of an increase in total numbers due to the fact that windfall development is not included this introduces an important element of flexibility. In addition, the housing numbers in the adopted JCS are based upon, and slightly exceed, the now revoked May 2008 Regional Strategy totals which, with the previous Regional Planning Guidance for East Anglia of 2000, had taken account of housing backlogs during those plan periods. And the Strategic Housing Market Assessment (and its updates) included an allowance to meet the affordable housing backlog (although there are practical difficulties in achieving it) in the adopted JCS. I have seen no convincing evidence that there is any significant housing backlog or shortfall either now or in the adopted JCS that cannot be accommodated by this Plan.
- 43. The GNDP has had regard to a range of population projections, some of which

are higher and some lower than the adopted JCS target. I do not consider that the submitted evidence shows that the housing numbers in this Plan, which is for only a part of the adopted JCS total, need to be decreased or increased. In any event, as the GNDP said in evidence, the question of increasing or decreasing housing numbers in the adopted JCS for the whole NPA (and other areas) is a matter for a future review of that Plan if monitoring later reveals there to be a problem.

The viability of the proposed development areas

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

Infrastructure delivery

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

NPA, and which deletes the submitted infrastructure projects related to the Plan's proposals. And, secondly, **MM7** provides a new Appendix 7a to the Plan which separately (and thus clearly) lists the infrastructure required for this Plan's development, based on the most up-to-date information available.

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

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

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

The Housing Trajectory and additional Framework 'buffer'

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

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

to the housing requirement. I reject this approach on a number of grounds. Firstly, it is unreasonable and unfair to retrospectively apply housing targets in plans which were at the time only in draft and to which relatively little weight could be attached under national policy guidance. A plan can only come into legal affect as part of the statutory development plan on adoption. It is only on, and from, this date that it forms part of the development plan for the area. It is common practice for councils to backdate the plan period to reflect the base date for the plan and its evidence base (particularly the Strategic Housing Market Assessment), but this is only the statistical period on which the plan is founded. The LPAs at the time would have been heavily, and rightly, criticised for assessing yearly housing targets in their monitoring reports against those draft plan targets.

- 63. Secondly, those adopted plans included in their future housing targets for the adopted plan period an element of backlog for past under delivery. Therefore, to include that backlog again in PUD calculations would be to introduce the likelihood of double counting.
- 64. Therefore, I accept the GNDP's evidence on this question as being the more reliable of those presented to me. It shows a cumulative over-delivery in all the years from 2000/01 to 2009/10, and only since then has there been under delivery ranging from 2.8% to 12.4%. In these circumstances, I agree with the GNDP that a PUD Framework buffer factor of 5% is appropriate (i.e. a 5.25 year housing land supply) as persistent under delivery has not been shown under normal economic circumstances.
- 65. As I have said, whatever way the figures are calculated there is not currently a 5.25-year housing land supply. It was suggested that planning permission is a pre-requisite for inclusion in the 5.25-year supply calculation, but I agree with the GNDP that it is not. There is no doubt that to be delivered a site must enjoy the benefit of planning permission. Footnote 11 of the Framework confirms that there could be circumstances when sites with planning permission may not be deliverable but, conversely, there may be sites without planning permission which are appropriate and available now and which could be delivered within 5 years.
- 66. There is not a preferred answer to how past shortfalls should be handled the two most common ways put to me were the 'Sedgefield' and 'Liverpool' approaches. In this case I agree with the GNDP that the shortfall should be added to the housing delivery target over the plan period because the JCS was only adopted in 2011 and it deals with that particular problem over the plan period (i.e. the 'Liverpool' approach), and this Plan forms part of it.
- 67. The GNDP's 'existing' figures in Appendix 1 of DV 21 would have to be revised downward as windfalls have been over-estimated [Appendix 1 of DV 35] and because the King Street (St Anne's Wharf) site in Norwich is not deliverable [DV 49]. Bearing these points in mind, the GNDP said on the last day of the hearings that its figures in Appendix 1 of DV 21 would give an NPA land supply of around 4.4 years of the 5.25-year requirement. Representors said it would be less [Table 3.2 of DV 32]. So it does not matter whether the backlog or shortfall should be added over 5 years, 5.25 years, or 6 years the fact is that there is not an adequate housing land supply as required in

the Framework.

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

Flexibility to adapt to rapid change

- 70. Paragraph 14 of the Framework requires plans to have sufficient flexibility to adapt to rapid change. As I have explained, the deliverability of critical infrastructure and the delivery of sites through Local Plans are not entirely certain and so the Plan has to address the consequences of a possible shortfall in the 5.25-year housing land supply, including possible contingency arrangements, in order to be sound. Unfortunately, the Plan's only answer is for a review of the whole JCS if there is no possibility of the timely construction of the NDR (paragraph 7.18), which would be a lengthy and time consuming process. There is no provision for a quicker and less complex method of dealing with deliverability problems, particularly for less critical delays in infrastructure provision. A delay or failure in the Broadland part of the NPA would probably mean that alternative housing land would have to be provided elsewhere in the NPA, although any policy should not rule out other new sites in the Broadland part of the NPA [DV 33].
- 71. I was assured by the GNDP that the NDR and the critical infrastructure would proceed according to the stated timetable, and that the housing would be delivered as set out in the modified Housing Trajectory. Thus, the GNDP Councils have nothing to fear from a modestly framed flexibility policy because, as they told me, it is unlikely to ever have to be implemented in practice. Such a policy is only a safeguard to ensure an effective Plan should the worst case scenario occur.
- 72. But there is no doubt that a policy is needed all parties accepted this point. Delay has already occurred in delivery from that anticipated under the adopted 2011 JCS's Housing Trajectory. And this Plan proposes a significant

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

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

housing land supply is not being maintained for <u>any</u> reason. I consider that a 10% under supply in the 5-year supply (plus appropriate buffer) in any relevant monitoring report would be a reasonable trigger level because of the need for quick action in the event of any shortfall, and because it was a percentage level generally accepted by hearing participants.

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

Overall conclusion on Issue 1

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

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

- 81. The Plan adds additional text to Policy 9 of the adopted JCS for the additional housing discussed above and also for around 25 hectares of new employment land at Rackheath to serve the local employment needs of this whole major growth location. The Rackheath Eco-Community proposal within the Plan area was identified by the Government in a supplement to Planning Guidance Planning Policy Statement 1: Eco-towns, and its 2009 Concept Statement included nearly 23 hectares of employment land in order to achieve the required mixed use community with employment provision.
- 82. The justification for this amount was derived from a 2008 Employment Growth and Employment Sites and Premises Study, which has not been

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

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

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

Other issues

- 86. Concerns were raised about flooding, water supply and possible water contamination, but no evidence was submitted. GNDP's evidence, however, was that these issues were capable of resolution (primarily in the detail of future proposals), and that there were no strategic reasons on these grounds why this Plan's proposals would cause any of the alleged problems. I agree with the GNDP's views and the similar views of its statutory consultees, particularly that of Anglian Water.
- 87. Local people were concerned about traffic through the village of Wroxham on the A1151 Wroxham Road where it converges on the bridge between Wroxham and Hoveton, but no evidence was submitted to substantiate it, and nor did the Highway Authority object. The GNDP's response was that the construction of the NDR, the focus of growth on Norwich, and the provision of services and facilities within the proposed housing areas would mean that

growth in this location would not directly pressure the A1151. The outputs from the Norwich Area Transportation Strategy Model showed very low traffic increases over Wroxham Bridge. I accept that there will be some increase in outward commuting and in leisure trips to the Broads and the North Norfolk Coast, but there was no evidence that these would create a danger to highway safety or significantly interrupt the free flow of traffic along this road.

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

Overall Conclusion and Recommendation

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

David Vickery

Inspector

This report is accompanied by the Appendix containing the Main Modifications

Schedule of proposed content for adoption

JCS for Broadland, Norwich and South Norfolk: the Broadland part of the Norwich Policy Area

Schedule of Proposed Content to be Adopted

The schedule below details the content proposed to be adopted for the Broadland part of the Norwich Policy Area Local Plan. This includes both the content submitted by the Councils, minor modifications for accuracy, and the Main Modifications required by the Inspector to make the plan sound. The Inspector's Main Modifications are referenced in the table below and set out in detail in Appendix 1 attached.

The page numbers and paragraph numbering below refer to the combined submission Plan with the JCS for Broadland, Norwich and South Norfolk [SDJCS 1], and do not take account of the deletion or addition of text. The content proposed to be adopted is shown as underlined text.

Section of JCS	JCS page no.	Text/diagram proposed to be adopted (underlined) [N.B. the words in square brackets are included for clarification purposes only]
01 Our Strategy – Para 2.14 under heading "The dilemmas"	P.10	[In assessing the evidence to help identify the most appropriate locations for growth outside of the urban area,] the area to the north east of the city [and the A11 corridor to the south west perform well. This allows] for a concentration of new [development to maximise the use of existing infrastructure]
01 Our Strategy – Para 2.15 under heading "the dilemmas"	P.10	In the case of Broadland, the historical pattern of development lends itself to further expansion with new growth locations in the parishes of Old Catton, Sprowston and Thorpe St Andrew, and the development of a low carbon community focussing on Rackheath, given its existing employment opportunities and railway line. The growth in these locations relies on the implementation of NATS]
01 Our Strategy – Para 2.16 under heading "the dilemmas"	P.10	By contrast, [the historic pattern of development in South Norfolk has focussed on its network of villages and market towns, such as Long Stratton and Wymondham, and has retained strategic green gaps between settlements.]
04 Spatial vision: third paragraph	Page 20	[Growth will be focussed on brownfield land in the Norwich urban area] and in a very large mixed use urban extension within the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle

Section of JCS	JCS page no.	Text/diagram proposed to be adopted (underlined) [N.B. the words in square brackets are included for clarification purposes only] (Appendix 5).
04 Spatial vision: under the heading "Climate change and sustainability" 3 rd bullet point	Page 20	inspired by the proposed exemplar at Rackheath, [zero carbon development will be the standard to be achieved through advances and innovation in the design, construction and management of sustainable communities and new buildings which improve energy efficiency and use renewable energy.]
04 Spatial vision: under the heading "Working and getting around" Second bullet point	Page 21	[investment at strategic and other employment locations will help create a stronger economy (including at Norwich city centre; Norwich Research Park, Hethel Engineering Centre,] Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle [Longwater, Wymondham and around Norwich International Airport).]
Key diagram – and under objective 3	Page 27	Add notation to the key diagram to show the area to the northeast of the urban area as one to which the terms "strategic employment sites" and "major housing growth and associated facilities" apply (see plan attached as Appendix 2)
05 Area-wide policies, Policy 4 Housing Delivery: under "Housing with care"	Page 41	[Mixed tenure housing with care will be required as part of overall provision in highly accessible locations. In particular provision will be required in Norwich, and the major growth locations of] Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle, [Cringleford, Hethersett, Wymondham and Long Stratton, and at Aylsham, Acle and Wroxham.]
05 Area-wide policies, Policy 4 Housing Delivery: Table following paragraph 5.25	Page 43	Minor modification for correction of Typographical error: Column 2 header to read 'Current Commitment 2008'
05 Area-wide policies, Policy 4 Housing Delivery:	Page 43	The figure of 9,000 for the 'New Allocations to 2026' in the Broadland (NPA) and the total of 11,099 recorded in the table for the 'New Commitment to 2026' in the Broadland (NPA).

Section of JCS	JCS page no.	Text/diagram proposed to be adopted (underlined) [N.B. the words in square brackets are included for clarification purposes only]
Table following paragraph 5.25		
06 Policies for Places: Introduction paragraph 6.3	Page 55	[Large-scale mixed-use developments in the Norwich Policy Area are provided] in a major urban extension in the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle, and[at Cringleford, Easton/Costessey, Hethersett, Long Stratton and Wymondham.]
06 Policies for places, Policy 9 Strategy for growth in the Norwich Policy Area: 2 nd & 8 th bullet points	Page 56	 Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle: 7,000 dwellings by 2026 continuing to grow to around 10,000 dwellings eventually 8th bullet point Broadland smaller sites in the NPA: 2,000 dwellings
06 Policies for places, Policy 9 Strategy for growth in the Norwich Policy Area: Final bullet point:	Page 57	[new employment development to serve local needs of major growth locations] including around 25ha of new employment land at Rackheath
06 Policies for places, Policy 9 Para 6.7	Page 57	Paragraph 6.7 to read The Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle incorporates land at Rackheath promoted for an eco-community under the government's eco-towns programme and development of the rest of the area will be expected to reflect similar high standards.
Para 6.12	Page 58	4 th bullet point

Section of JCS	JCS page no.	Text/diagram proposed to be adopted (underlined) [N.B. the words in square brackets are included for clarification purposes only]
4 th bullet point		Rackheath: around 25ha of new employment land for a range of employment uses to strengthen the employment role of this location and provide local opportunities for the new community in this area
Diagram after the end of the end of the paragraph 6.12 – Relationship between strategic growth locations within the Norwich Policy Area	Page 59	Add notation to the diagram to include the area of the 'Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle' as a location for both 'Major housing growth and associated facilities' and 'Strategic employment locations' (see plan attached as Appendix 3)
Diagram after para 6.12, entitled "Main Housing Allocations"	Page 60	Add notation to show additional locations for 'Proposed housing in unspecified locations in the Norwich Policy Area' as follows: • 10,000 new houses to the north east of the urban area within the Norwich policy area, • 2,000 houses in the NPA part of Broadland. Add notation to show the 'Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle' (See plan attached as Appendix 4)
Policy 10 Locations for major new or expanded communities in the Norwich Policy Area: first sentence	Page 63	[Major growth] in the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle, and [at Cringleford, Easton/Costessey, Hethersett, Long Stratton and Wymondham will be masterplanned as attractive, well-serviced, integrated, mixed use development using a recognised design process giving local people an opportunity to shape development.]
Policy 10 Paragraph headed "Old Catton,	Page 63	Heading and paragraphs as follows: Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle

Section of JCS	JCS page no.	Text/diagram proposed to be adopted (underlined) [N.B. the words in square brackets are included for clarification purposes only]
Sprowston, Rackheath, Thorpe St Andrew growth triangle"		This location will deliver an urban extension extending on both sides of the Northern Distributor Road. Complete delivery of the extension is dependent on implementation of the Northern Distributor Road. However, there is scope for partial delivery, the precise extent of which will be assessed through the Area Action Plan. The structure of the local geography suggests that this new community will take the form of a series of inter-related new villages or quarters and will include:
		at least 7,000 dwellings (rising to a total of at least 10,000 dwellings after 2026)
		a district centre based around an accessible 'high street' and including a new library, education and health facilities. This may be provided by building on the proposed centre at Blue Boar Lane or by the creation of a second district centre elsewhere in the Growth Triangle. The development will also require new local centres
		new pre-school provision and up to six new primary schools plus a new secondary school with an initial phase to open as early as possible. To facilitate early provision the early phases of development will concentrate on family housing
		new employment allocations for local needs including expansion of the Rackheath employment area
		retention of existing important greenspaces and significant levels of heathland re-creation to provide stepping stones to link Mousehold Heath to the surrounding countryside. Building design including, for example, appropriate use of 'green roofs' will help provide linkage between green spaces
		restoring and conserving historic parkland and important woodland. A significant area north of Rackheath will be provided as green space to act as an ecological buffer zone and ensure no significant adverse impacts on the Broads SAC.

Section of JCS	JCS page no.	Text/diagram proposed to be adopted (underlined) [N.B. the words in square brackets are included for clarification purposes only]
		 Broadland SPA and Broadland Ramsar site Bus Rapid Transit to the city centre, possibly via Salhouse Road and Gurney Road, and a choice of safe and direct cycle routes to the centre safe and direct cycle and pedestrian routes, and orbital bus services, to Broadland Business Park, Rackheath employment area, airport employment areas and to the surrounding countryside new rail halts at Rackheath and Broadland Business Park permeability and community integration across the Northern Distributor Road and with existing communities. This will be crucial for the successful development of the area a new household waste recycling centre. A single co-ordinated approach will be required across the whole area. This will be provided through the preparation of an Area Action Plan (or any future equivalent process). More detailed masterplanning will be required for each quarter.
Para 6.16 second	Page 66	The major urban extension in the Old Catton, Sprowston, Rackheath, and Thorpe St Andrew growth triangle will provide a concentration of growth which can support local services, facilities, and infrastructure including secondary education, high quality public transport links and significant green infrastructure. An Area Action Plan and a sustainable development code are being developed. The growth triangle is proposed to accommodate 10,000 dwellings after 2026. A large part of the [development at Rackheath was promoted as an eco-community under the previous Government's eco- towns programme.] The Rackheath low carbon development remains part of this strategy.
Para 6.16 second line	Page 66	[This makes a] <u>similar [large-scale urban expansion inappropriate.]</u>
Para 6.19	Page 66	[In particular it is necessary to allow] significant development in the growth triangle and [the full

Section of JCS	JCS page no.	Text/diagram proposed to be adopted (underlined) [N.B. the words in square brackets are included for clarification purposes only]
		implementation of the remainder of the Norwich Area Transportation Strategy. The completion of appropriate improvements at Postwick junction would allow for some development] in the Old Catton, Sprowston, Thorpe St Andrew growth triangle [in advance of the NDR] (see supporting text for Policy 20).
Para 6.20 fourth sentence	Page 67	[The growth] in the Old Catton, Sprowston, Rackheath, Thorpe St Andrew area [will require the implementation of bus priority routes into the city centre including] a [Bus Rapid Transit] route which may be via Gurney Road/Salhouse Road.
Paragraph 6.22	Page 67	A new secondary school is needed to serve the new community in the north east. [The form and location of secondary provision for growth in the west and south west is] more [complex and yet to be determined.]
Diagram following policy 10, entitled "Green infrastructure priority areas supporting key growth locations"	Page 69	Add notation to show the 'Growth location' and 'Priority areas for Green Infrastructure' to the northeast of the urban area. Add notation to show priority corridor A from Norwich to the Broads. (see plan attached as Appendix 5)
Policy 12: The remainder of the Norwich urban area, including the fringe parishes: 1st paragraph	Page 74	[It will be expanded] through significant growth in the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle, and smaller [urban extensions at Cringleford, and Easton/Costessey (Policy 10).]
Policy 15 Service Villages third paragraph	Page 84	[In addition to the settlements above, Easton] and Rackheath [have equivalent status to a Service Village while providing a location for significant housing growth.]
Policy 19, The hierarchy of centres Point 3.	Page 89	[New district centres/high streets to be established] within the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle, [at Blue Boar Lane, Sprowston and Hall Road, Norwich.] The Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle will be served by a district centre. This may be provided by

Section of JCS	JCS page no.	Text/diagram proposed to be adopted (underlined) [N.B. the words in square brackets are included for clarification purposes only] building on the proposed district centre at Blue Boar
		Lane or the creation of a second district centre elsewhere in the Triangle as determined through the Area Action Plan for the Growth Triangle.
Paragraph 6.77	Page 90	[The proposed large-scale housing areas will provide for shops and services to meet local needs where they are not able to benefit from existing centres.] The Old Catton, Rackheath, Sprowston and Thorpe St Andrew growth triangle in particular will be sufficiently large to require a district centre. Preferably this will include a food store as an anchor and sufficient leisure and ancillary activities to provide for the attraction of a range of trips. This may be through building on the proposed centre at Blue Boar Lane or the creation of a second district centre elsewhere in the Growth Triangle. This will be determined through the Area Action Plan for the area.
07 Implementation and monitoring, Paragraph 7.16 and table below	Page 95	See MM1 in Appendix 1
Para 7.17	Page 95	Broadland District Council is committed to preparing an Area Action Plan (AAP) for the growth triangle. As part of the preparation of this AAP there will be an investigation of any potential that may exist for further growth to take place (in addition to that shown in table 1 above) without confirmation of the delivery of the NDR. This will include testing whether interim schemes and/or alternatives to the NDR could help to facilitate growth without compromising the spatial vision and objectives of the JCS. Therefore, the analysis would need to cover capacity of all infrastructure, not just road capacity, the implications of particular sites, and the nature of the proposed development. [It will be essential that the growth is delivered in accordance with the overall strategy, taking account of its wider impact across the Norwich area, including a full range of infrastructure provision, services and high-quality public transport and walking / cycling provision.]
Para 7.18	Page	[Development beyond the pre-NDR threshold] established through the AAP process [will not be

Section of JCS	JCS page no.	Text/diagram proposed to be adopted (underlined) [N.B. the words in square brackets are included for clarification purposes only]	
	96	possible without a commitment to the NDR. If it becomes clear that there is no possibility of the timely construction of the NDR, a review of the JCS proposals] for the growth triangle [and the implications for the strategy as a whole would be triggered.]	
New text inserted following Para 7.18	Page 96	See MM2 in Appendix 1	
Appendix 5 Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle	Page 107	Insert map showing the area of the 'Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle' (see plan attached at Appendix 6)	
Appendix 6	Pages 108- 111	Insert following note onto each of the first four pages of App 6 (as per Inspector's modification MM3 in Appendix 1): This appendix illustrates the trajectory as anticipated in 2010 and historic information back to the base date of the now revoked East of England Plan. Not only is this page of the appendix out of date but it also includes assumptions about delivery from elements of the plan that were remitted by court order. It is reproduced here solely for historical information. For updated information on housing trajectories please see the Annual Monitoring Report. For a housing trajectory in the Broadland part of the NPA see Appendix 6a and the published Annual Monitoring Report.	
Appendix 6 housing trajectory table entitled "Growth locations"	Page 113	See MM4 in Appendix 1	
New Appendix 6a to be inserted	-	See MM5 in Appendix 1	

Section of JCS	JCS page no.	Text/diagram proposed to be adopted (underlined) [N.B. the words in square brackets are included for clarification purposes only]
after Appendix 6		
Appendix 7	Pages 114- 147	See MM6 in Appendix 1
New Appendix 7a to be inserted after Appendix 7	-	See MM7 in Appendix 1
New Appendix 8a to be inserted after Appendix 8	-	See MM8 in Appendix 1

Main Modifications

The modifications below are expressed either in the conventional form of strikethrough for deletions and <u>underlining</u> for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the combined submission Plan with the JCS [SDJCS 1], and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
MM1	95	Para 7.16 and table below	Make changes attached as MM1
MM2	96	New section Paras 7.19- 20 and Policies 21 and 22	Insert new section, as attached as MM2
MM3	108	Appendix 6	Insert following note onto each of the first four pages of App 6: This appendix illustrates the trajectory as anticipated in 2010 and historic information back to the base date of the now revoked East of England Plan. Not only is this page of the appendix out of date but it also includes assumptions about delivery from elements of the plan that were remitted by court order. It is reproduced here solely for historical information. For updated information on housing trajectories please see the Annual Monitoring Report. For a housing trajectory in the Broadland part of the NPA see Appendix 6a and the published Annual Monitoring Report.
MM4	113	Table headed Growth Locations	Make changes attached at MM4
MM5	-	-	Insert new Appendix 6a, following Appendix 6, as attached at MM5

Ref	Page	Policy/ Paragraph	Main Modification
MM6	114 - 147	Appendix 7	Make changes attached at MM6
MM7	-	New section	Insert new Appendix 7a, following Appendix 7, as attached at MM7
MM8	-	New section	Insert new Appendix 8a, following Appendix 8, as attached at MM8

Please note - where large new sections are inserted (see MM2, 5, 7 and 8) the additional text is not underlined.

	Page	Policy/
Ref	3	Paragraph
MM1	95	Para 7.16 and table below

7.16 Pending clarification of the NDR's delivery or otherwise, the existing commitment of 1400 dwellings in the Sprowston Fringe can take place without improvements to Postwick Junction. Subject to acceptable improvements to Postwick junction (in the form of Postwick Hub or a suitable alternative) there is significant potential for further development in the growth triangle before confirmation of the delivery of the NDR. The table below summarises the current understanding of this potential.

Location	Level of growth supported by current evidence	Constrained development
Growth Triangle	At least 1600 dwellings (plus 200 exemplar at Rackheath prior to Postwick junction improvements)	New employment allocation at Rackheath
Smaller sites in Broadland NPA	Delivery of the smaller sites allowance will be dealt with on a site by site basis	
Broadland Business Park	Development of existing allocation and new allocation (approx 18ha incl c50,000m2 B1)	
Airport area		New employment allocation

Insert the following text:

7.16 Pending clarity on Postwick Hub's and the NDR's delivery, the table below summarises the current understanding of development potential offered by the strategic locations in the Broadland NPA as at 2013. The delivery of the smaller sites allowance in the Broadland NPA will be dealt with on a site by site basis as the dependence on Postwick junction and the NDR will vary with location.

Development that can come forward in advance of improvements to Postwick Junction:		
Growth Triangle	1440 committed dwellings in the Sprowston Fringe	
Rackheath	200 dwellings on the proposed exemplar development at Rackheath (in addition to 94 existing consented dwellings)	
Further development that can come Postwick Junction and in advance of o	forward following improvements to confirmation of delivery of the NDR:	
Growth Triangle	At least 1600 dwellings	
Broadland Business Park	Development of existing allocation and new allocation (approx. 18ha including c50,000m2 B1)	
Development that cannot come forward until confirmation of delivery of the NDR:		
Growth Triangle	All remaining housing in the Growth Triangle and new employment allocation at Rackheath	
Airport Area	New employment allocation	

Ref	Page	Policy/ Paragraph
MM2	96	New section
		Paras 7.19-20 and Policies 21 and 22

Insert new section as follows:

Implementation and delivery within the Broadland part of the Norwich Policy Area

7.19 Following the adoption of the JCS in March 2011 a court judgment remitted parts of the previously adopted plan for further consideration. This judgment remitted specific elements of the proposals within the Broadland part of the Norwich Policy Area and in particular: a) the Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle (including employment growth at Rackheath but excluding employment land at Broadland Business Park and the airport); and b) 2000 homes proposed on smaller sites throughout the Broadland part of the Norwich Policy Area. These proposals were resubmitted for further examination, and policies 21 and 22 were necessary in order to ensure the soundness of this part of the JCS. For the avoidance of doubt, policies 21 and 22 below apply only to the proposals previously remitted by the Court order.

7.20 Between the original adoption of the JCS and consideration of the remitted proposals, key infrastructure items serving the Broadland part of the NPA were not progressed at the rate envisaged in the original JCS. Because of this, and the further scrutiny of the remitted elements of the plan in the light of updated government guidance about the housing land supply and deliverability of the plan proposals, it was considered necessary to strengthen policy with regard to a positive approach to sustainable development, monitoring and housing land supply. Progress regarding delivery of housing land will be rigorously monitored against targets. If monitoring reveals that the Broadland part of the NPA will significantly under deliver in terms of a 5-year housing land supply (plus the "additional buffer" required in national policy), then action will be taken to address this as set out in policy 22.

Policy 21: Implementation of proposals in the Broadland part of the Norwich Policy Area

When considering development proposals in their part of the Norwich Policy Area Broadland District Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

Policy 22: Action to ensure the delivery of housing land in the Broadland part of the Norwich Policy Area

In addition to the JCS review "trigger" set out in paragraph 7.18, if any Monitoring Report (MR) produced after two full years from the adoption of this part-JCS Local Plan demonstrates that there is a significant shortfall (as defined below) in the 5-year supply of housing land (plus the "additional buffer" required in current national policy) affecting the Broadland part of the Norwich Policy Area (NPA), then the Councils will take the course of action specified below to address the identified shortfall.

The Councils will consider that a significant shortfall has arisen if the MR (produced annually) shows there to be less than 90% of the required deliverable housing land (as defined in current national policy).

In the event of an identified shortfall, the Councils will produce a short, focussed Local Plan which will have the objective of identifying and allocating additional locations within the whole NPA area for immediately deliverable housing land to remedy that shortfall, in accordance with the settlement hierarchy set out in paragraph 6.2 of the JCS. The Local Plan will cover such a time period as may reasonably be considered necessary for the delivery delay or shortfall (however caused) to be resolved.

MM4

Ref	Page	Policy/ Paragraph
MM4	113	Table headed Growth Locations

Growth locations (excluding the Broadland part of the Norwich Policy Area)

This table illustrates the trajectory as anticipated in 2010 for the Plan excluding figures for the Broadland part of the Norwich Policy Area. It is now out of date. For updated information on housing trajectories please see the Annual Monitoring Report. For a housing trajectory in the Broadland part of the NPA see Appendix 6a and the Annual Monitoring Report.

District		_			_				To		per of un			_					_			Average annual
District	2006/ 07	2007/ 08	2008/ 09	2009/ 10	2010/ 11	2011/ 12	2012/ 13	2013/ 14	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018/ 19	2019/ 20	2020/ 21	2021/ 22	2022 /23	2023/ 24	2024/ 25	2025/ 26	Total units	build rate
Broadland	θ	θ	θ	Ө	θ	180	230	230	580	680	804	804	804	804	804	804	804	804	804	764	9,900	582
Rackheath						180	230	230	230	230	230	230	230	230	230	230	230	230	230	230	3,400	227
Remainder of Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle (inside NDR)									125	225	350	350	350	350	350	350	350	350	350	350	3,850	321
Additional small sites around Broadland NPA									170	170	170	170	170	170	170	170	170	170	170	130	2000	167
Additional sites around rural Broadland									55	55	54	54	54	54	54	54	54	54	54	54	650	54
Norwich	0	0	0	0	0	0	0	0	250	250	250	250	250	250	250	250	250	250	250	250	3,000	176
Norwich (3,000)									250	250	250	250	250	250	250	250	250	250	250	250	3,000	250
South Norfolk	0	0	0	0	0	0	0	0	525	655	875	950	1,039	1,128	978	898	778	778	778	683	10,065	592
Wymondham (2,200)									185	185	185	185	185	185	185	185	185	185	185	165	2,200	183
Long Stratton (1,800)												50	140	230	230	230	230	230	230	230	1,800	200
Hethersett (1,000)									50	90	175	175	175	175	100	60					1,000	125
Cringleford (1,200)										50	100	125	125	125	125	125	125	125	125	50	1,200	109
Easton/ Costessey (1,000)									50	90	175	175	175	175	100	60					1,000	125
Additional smaller sites around South Norfolk NPA (1,800)									150	150	150	150	150	150	150	150	150	150	150	150	1,800	150
Additional sites around Rural South Norfolk									84	84	84	84	83	83	83	83	83	83	83	83	1,000	83
Additional urban capacity in rural South Norfolk									6	6	6	6	6	5	5	5	5	5	5	5	65	5
TOTAL	_	_	_	_	_	180	230	230	1,355	1,585	1,929	2,004	2,093	2,182	2,032	1,952	1,832	1,832	1,832	1,697	22,96 5	2,871
	0	0	0	0	0	<u>o</u>	<u>o</u>	<u>o</u>	<u>830</u>	<u>960</u>	<u>1179</u>	<u>1254</u>	1343	1432	1282	1202	1082	1082	1082	<u>987</u>	<u>13715</u>	1143

MM5

Ref	Page	Policy/ Paragraph	Main Modification
MM5	1	-	Insert new Appendix 6a, to follow Appendix 6

Appendix 6a

Trajectory of delivery of Homes expected from previously remitted Growth Locations in Broadland part of NPA

	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	TOTAL	Av build
Rackheath	77	77	70	185	230	230	230	230	230	230	230	230	2249	187
Remainder of Old Catton, Sprowston, Rackheath,	20	163	234	373	435	440	515	590	530	530	530	497	4857	405

Thorpe St Andrew Growth Triangle (inside NDR)														
Additional small sites around Broadland NPA	98	148	161	266	328	300	225	150	150	150	25	0	2001	167
Total	195	388	465	824	993	970	970	970	910	910	785	727	9107	759

This trajectory illustrates delivery anticipated at July 2013. It should not be summed with figures produced in Appendix 6. For up to date information please see the Annual Monitoring Report.

Ref	Page	Policy/ Paragraph
MM6	114 - 147	Appendix 7

Appendix 7: Implementation Framework <u>and Critical Path outside of the Broadland part of the Norwich Policy Area</u>

The framework lists infrastructure required to facilitate development promoted in this JCS. It is early work and is not intended to be an exhaustive or precise list of the entire infrastructure that will be needed by 2026. Additional infrastructure will be needed beyond this date, including in the growth triangle where 3,000 dwellings are proposed after 2026. This table was correct at late 2010 and relates only to infrastructure that is not required to deliver any aspect of the plan that was previously remitted. Updated information on the schemes listed is contained within the published LIPP available on the GNDP website. Updated information on infrastructure schemes needed in part to support some element of the previously remitted growth proposals in the Broadland part of the NPA is available in Appendix 7a.

The GNDP will manage a delivery programme supporting the implementation of this JCS. The programme will be developed through the Local Investment Plan and Programme (LIPP). As decisions are made locally and nationally on prioritisation and funding of infrastructure, the content, phasing and priorities of this list will be amended accordingly. This will happen via the LIPP process which will be subject to regular review.

The definition of the three levels of priority is derived from the Greater Norwich Infrastructure Needs and Funding Study (INF 1; in particular see Page 194) but expands the Study's definition to explicitly recognise the differential impact on the overall strategy. Consequently, the categories are:

Priority 1 - Infrastructure is fundamental to the strategy or must happen to enable physical growth. It includes key elements of transport, water and electricity infrastructure and green infrastructure requirements from the Habitats Regulation Assessment. Failure to deliver infrastructure that is fundamental to the strategy would have such an impact that it would require the strategy to be reviewed. This particularly applies to the NDR and the associated package of public transport enhancement. The sustainable transport requirements of the strategy and much of the development to the north of the built up area is dependent on these key elements of NATS.

Priority 2 - Infrastructure is essential to significant elements of the strategy and required if growth is to be achieved in a timely and sustainable manner. Failure to address these infrastructure requirements is likely to result in the refusal of planning permission for individual growth proposals, particularly in the medium term as pressures build and any existing capacity is used up.

Priority 3 - Infrastructure is required to deliver the overall vision for sustainable growth but is unlikely to prevent development in the short to medium term. The overall quality of life in the area is likely to be poorer without this infrastructure. Failure to address these infrastructure requirements is likely to result in the refusal of planning permission for individual growth proposals.

Table 1 – Infrastructure Framework shows infrastructure requirements to support growth across the JCS period.

Table 1 – Infrastructure Framework

Infrastructure Framework: Priority 1 projects 2008 - 2016

The base date for the Strategy is 2008. This table includes projects from 2008 - 2011 (the adoption of the Strategy) and 2011 - 2016 (the first 5 years of delivery post adoption)

Waste Water

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimate d delivery dates by	Source
SP1	Sewerage upgrade solutions subject to ongoing discussions with Anglian Water	Rackheath	Developer	tba	Developer/ AW provision	2016	Water Cycle Study Stage 2: B
SP3	Whitlingham Upgrade (Option 1)	Norwich Policy Area	Anglian Water	42.9	Developer/ AW provision	2016	Water Cycle Study Stage 2: B
SP4	Whitlingham Upgrade (Option 2)	Norwich	Anglian Water	5	Developer/ AW provision	2016	Water Cycle Study Stage 2: B
SP5	Wymondham upgrade (Option 2)	Wymondham	Anglian Water	13.8	Developer/ AW provision	2016	Water Cycle Study Stage 2: B

SP6	Rackheath (Option 2)	Rackheath	Anglian Water	48	Developer/	2016	Water Cycle
					₩		Study Stage 2:
					provision		B

Potable Water

Water supply is adequate for growth in the short-term. Supply will require enhancement in the longer term, Anglian Water are committed to finding a solution by 2012. Solutions will be funded through the AMP process and developer contributions.

Green Infrastructure

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimate d delivery dates by	Source
GI 15	Enhance public access to Yare Valley and Bawburgh Lakes	Overall scale of growth	Local Authorities/ Developer	tba	Local authority/ Developer contributio ns	2016	Green Infrastructure Delivery Plan
GI 16	Retention and recreation of Mousehold Heath to the surrounding countryside	Overall scale of growth in particular Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Local Authorities/ Developer	tba	Local authority/ Developer contributio ns	2016	Green Infrastructure Delivery Plan

GI 17	Broads Buffer Zone	Overall scale of growth in	Local	tba	Local	2016	Green
		particular Old Catton,	Authorities/		authority/		Infrastructure
		Sprowston, Rackheath and	Developer		Developer		Delivery Plan
		Thorpe St Andrew Growth	•		contributio		•
		Triangle			ns		

Electricity

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimate d delivery dates by	Source
U1	New primary sub-station on existing site (Hurricane Way)	Expansion of the employment area - airport business park	EDF energy	5.5	70% AMP ● 30% Developer contributions	2016	Infrastructure Needs and Funding Study 2009

Transportation

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
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11	Norwich Northern Distributor Road	Overall scale of growth in particular Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle • Broadland: Smaller sites in the NPA (2000 dwellings) • Norwich Area Transportation Strategy including delivery of BRT • Broadland Business Park • Airport employment allocation		106.2	DFT £67.5m ◆ Growth Point ◆ Developer Contributions ◆ Norfolk County Council	2016	NATS
T2a	Postwick Junction improvements	Overall Scale of Growth. Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle • Broadland: Smaller sites in the NPA (2000 dwellings) • Norwich Area Transportation Strategy including delivery of BRT • Broadland Business Park • Airport employment allocation	Norfolk County Council	19	DfT ◆ Growth Point 3.5 ◆ Developer contributions	2016	NATS
Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source

T2b	Postwick Park and Ride Junction improvements	Overall Scale of Growth. Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle • Broadland: Smaller sites in the NPA (2000 dwellings) • Norwich Area Transportation Strategy including delivery of BRT • Broadland Business Park • Airport employment allocation	Norfolk County Council	6	Developer contributions	2016	NATS
T4 & T17	Thickthorn junction improvement including bus priority and park and ride improvements	Wymondham, Hethersett and Cringleford Growth Locations	Norfolk County Council/ Highways Agency	30	Developer contributions	2016 (scheme expected to be phased)	NATS
T5	Longwater junction improvements	West Growth Location	Norfolk County Council/ Highways Agency	30	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS
T6	Norwich Research Park transport infrastructure phase 1	Norwich Research Park	Norfolk County Council/ Highways Agency	5	Growth Point • Developer contributions	2016	NATS
T7	Grapes Hill bus improvements	Overall Growth	Norfolk County	0.18	Growth Point/ EEDA	Delivered	NATS

			Council				
Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
Т7	Bus improvements Newmarket Road	Wymondham, Hethersett and Cringleford • Norwich Area Transportation Strategy including delivery of BRT	Norfolk County Council	0.4	Growth Point	Delivered	NATS
T7	City centre bus improvements phase 1	Overall Growth	Norfolk County Council/ Norwich City Council	1	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS
T8	Bus Rapid Transit via Fakenham Road - A1067 - Phase 1	Broadland Fringe Growth (subject to location of growth)	Norfolk County Council/ Norwich City Council	2.5	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS
T9	Bus Rapid Transit via Dereham Road - Phase 1	West Growth Location	Norfolk County Council/ Norwich City Council	1.25	Growth Point	2010 - 2011	NATS

Ref	Scheme	Required for growth in:	Promoter/ Delivery	Total Cost	Funding sources	Estimated delivery	Source
			body	£m	Sources	dates by	
T10	Bus Rapid Transit via Yarmouth Road - Phase 1		Norfolk County Council/ Norwich City Council	2.5	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS
T11	Bus Rapid Transit via Salhouse Road and Gurney Road Phase 1	Rackheath, and Thorpe St	Norfolk County Council/ Norwich City Council	1.8	Eco- community PoD Developer contributions	2016	NATS
T12	Bus Rapid Transit via Norwich airport A140 to City centre Phase 1	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	2.5	Norfolk County Council • DfT • Growth Point • Developer contributions	2011-2016	NATS

T13	Bus priority route via Hethersett Lane/ Hospital/ Norwich Research Park/ University of East Anglia/ City centre	Wymondham, Hethersett and Cringleford Growth Location & NRP	Norfolk County Council/ Norwich City Council	2.7	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS
Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
T14	Bus priority route via B1172 phase 1	Wymondham, Hethersett Growth Location	Norfolk County Council/ Norwich City Council	1.7	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS
T15	Development Link Broadland Business Park to Salhouse Road	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Developer Lead	2.5	-Developer contributions	2016	NATS
T16	Bus priority - approach to Harford Junction	Long Stratton Growth Location	Norfolk County Council/ Highways Agency	2	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS

T18	Pedestrian / Cycle links to Longwater	West Growth Locations	Norfolk County Council	1.5	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS
N/A	Lady Julian Bridge	NATS • City centre	Norwich City Council	2.58	Growth Point • S106 • EEDA	Delivered	NATS
Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
N/A	Barrack Street ring-road improvement works	Overall Growth	Norfolk County Council/ Norwich City Council	1.3	Growth Point	Delivered	NATS
N/A	St Augustine's	Norwich Area Transportation	Norfolk	3.49	Growth point	2010	NATS
	Gyratory	Strategy including delivery of BRT • City centre bus enhancements		3.13	2.42 • LTP 1.04 • S106 0.03		

Infrastructure Framework: Priority 1 projects 2016 -2021

The base date for the Strategy is 2008. This table includes projects from 2008 - 2011 (the adoption of the Strategy) and 2011 - 2016 (the first 5 years of delivery post adoption)

Waste Water

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimat ed delivery dates by	Source	
SP1	Sewerage upgrade solutions subject to ongoing discussions with Anglian Water	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Developer	TBA	Developer/ AW provision	2021	Water Study 2b	Cycle Stage
SP2	Sewerage upgrade - solutions subject to ongoing discussions with Anglian Water	Hethersett, Cringleford, Easton/ Costessey	Developer	ТВА	Developer/ AW provision	2021	Water Study 2b	Cycle Stage
SP7	Whitlingham Upgrade (Option 1)	Norwich Policy Area	Anglian Water	14.4	Developer/ AW provision	2021	Water Study 2b	Cycle Stage
SP8	Whitlingham Upgrade (Option 2)	Norwich	Anglian Water	0.8	Developer/ AW provision	2021	Water Study 2b	Cycle Stage

SP9	Wymondham upgrade	West growth locations	Anglian	22.4	Developer/	2021	Water	Cycle
	(Option 2)	_	Water		AW provision		Study	Stage
							2b	

Potable Water

Water supply is adequate for growth in the short-term. Supply will require enhancement in the longer term, Anglian Water are committed to finding a solution by 2012. Solutions will be funded through the AMP process and developer contributions.

Electricity

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimat ed delivery dates by	Source
U2	New primary substation on new site (Norwich Airport north)	Expansion of the employment area airport business park • Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	EDF energy	6.3	Developer contributions	2021	Infrastructure Needs and Funding Study
U3	New grid sub-station on existing sites (Norwich East)	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	EDF energy	17	100% AMP	2021	Infrastructure Needs and Funding Study

Green Infrastructure

The table below lists the Priority 1 infrastructure requirements to deliver the JCS. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment and Utilities. All potable water improvements are delivered through the AMP process and are not included in this table.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimat ed delivery dates by	Source
GI 15	Enhance public access to Yare Valley and Bawburgh Lakes	_	Local authorities/ Developers	tba	Local authorities/ Developer contribution	2021	Green Infrastructure Delivery Plan
GI-16	Retention and recreation of Mousehold Heath to the surrounding countryside	Overall scale of growth in particular Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Local authorities/ Developers	tba	Local authorities/ Developer contribution	2021	Green Infrastructure Delivery Plan
GI 17	Broads Buffer Zone	Overall scale of growth in particular Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Local authorities/ Developers	tba	Local authorities/ Developer contribution	2021	Green Infrastructure Delivery Plan

Transportation

The table below lists the Priority 1 infrastructure requirements to deliver the JCS. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment and Utilities. All potable water improvements are delivered through the AMP process and are not included in this table.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
ТЗ	Long Stratton bypass A140 including improvement at Hempnall crossroads	Long Stratton Growth Locations	Developer / Norfolk County Council	20	Developer contributions	2021	Developer
Т6	Norwich Research Park transport infrastructure phase 2	Norwich Research Park	Norfolk County Council/ Highways Agency	8	Growth Point • Developer contributions	2021	NATS
T7	Bus priority - approach to Harford Junction	Overall Growth	Norfolk County Council	2	Developer contributions	2021	NATS
Т7	City centre bus improvements phase 1	Overall Growth	Norfolk County Council/ Norwich City Council	2.6	Growth Point LTP Developer contributions	2021	NATS
T7	City centre bus	Overall Growth	Norfolk	6	Growth Point	2021	NATS

	improvements phase 2		County Council/ Norwich City Council		• LTP • Developer contributions		
Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
T8	Bus Rapid Transit via Fakenham Road - A1067 - Phase 2	Broadland Fringe Growth	Norfolk County Council/ Norwich City Council	5	Norfolk County Council • DfT • Growth Point • Developer contributions	2021	NATS
T9	Bus improvements Dereham Road phase 2	West Growth Locations	Norfolk County Council/ Norwich City Council	2.6	Growth Point • Developer contributions	2021	NATS
T10	Bus Rapid Transit via Yarmouth Road - Phase 2	Broadland Business Park Expansion	Norfolk County Council/ Norwich City Council	5	Norfolk County Council • DfT • Growth Point • Developer contributions	2021	NATS
T11	Bus improvements via Salhouse Road and Gurney Road phase 2	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City	2.6	Developer contributions Rackheath POD	2021	NATS

Norwich airport A140 to City centre Phase 2				Council				
Ref Scheme Required for growth in: Delivery body Cost £m Gources delivery dates by T15 Development Link Broadland Business Park to Salhouse Andrew Growth triangle Council/ Delivery body Cost £m Gources delivery dates by Sources Sources Sources Sources delivery dates by Sources	T12	Norwich airport A140 to City centre Phase	Rackheath, and Thorpe St	County Council/ Norwich City	5	County Council • DfT • Growth Point Developer	2021	NATS
Broadland Business Rackheath, and Thorpe St County Park to Salhouse Andrew Growth triangle Council/				Dramatar/	Total			
Council	Ref	Scheme	Required for growth in:	Delivery	Cost		delivery	Source
Totals <u>88.80</u>		Development Link Broadland Business Park to Salhouse	Old Catton, Sprowston, Rackheath, and Thorpe St	Delivery body Norfolk County Council/ Norwich City	Cost £m	sources Developer	delivery dates by	Source NATS

Infrastructure Framework: Priority 1 projects 2021 -2026

The base date for the Strategy is 2008. This table includes projects from 2008 - 2011 (the adoption of the Strategy) and 2011 - 2016 (the first 5 years of delivery post adoption)

Waste Water

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimate d delivery dates by	Source
SP1	Sewerage upgrade solutions subject to ongoing discussions with Anglian Water	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Developer	tba	Developer/ AW provision	2026	Water Cycle Study Stage 2 B
SP2	Sewerage upgrade - solutions subject to ongoing discussions with Anglian Water	Hethersett, Cringleford, Easton/ Costessey	Developer	tba	Developer/ AW provision	2026	Water Cycle Study Stage 2 B
SP10	Whitlingham Upgrade (Option 1)	Norwich Policy Area	Anglian Water	4.3	Developer/ AW provision	2026	Water Cycle Study Stage 2 B

SP11	Whitlingham Upgrade (Option 2)	Norwich	Anglian Water	0.4	Developer/ AW provision	2026	Water Cycle Study Stage 2 B
Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimate d delivery dates by	Source
SP12	Wymondham upgrade (Option 2)	West growth locations	Anglian Water	0.5	Developer/ AW provision	2026	Water Cycle Study Stage 2 B
SP13	Sewerage upgrade - solutions subject to ongoing discussions with Anglian Water	Long Stratton	Anglian Water	Tba	Developer/ AW provision	2026	Water Cycle Study Stage 2 B

Potable Water

Water supply is adequate for growth in the short-term. Supply will require enhancement in the longer term, Anglian Water are committed to finding a solution by 2012. Solutions will be funded through the AMP process and developer contributions.

Electricity

The table below lists the Priority 1 infrastructure requirements to deliver the JCS. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment) and Utilities.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
U4	New primary substation on new site (Sprowston / Rackheath)	Old Catton, Sprowston, Rackheath, and Thorpe St Andrews growth triangle	EDF energy	4.3	Developer contribution	2026	Infrastructure Needs and Funding Study 2009
U5	Replacement of transformers and switchgear in existing site (Hapton)	Long Stratton	EDF energy	2.53	83% AMP • 17% Developer contributions	2026	Infrastructure Needs and Funding Study 2009
U6	Replacement of transformers and switchgear in existing site (Wymondham)	SW Growth location	EDF energy	2.53	67% AMP • 33% Developer contributions	2026	Infrastructure Needs and Funding Study 2009

Green Infrastructure

The table below lists the Priority 1 infrastructure requirements to deliver the JCS. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment) and Utilities.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
GI 16	Retention and recreation of Mousehold Heath to the surrounding countryside	Overall scale of growth in particular Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	-	tba	-	2026	Green Infrastructure Delivery Plan

Transportation

The table below lists the Priority 1 infrastructure requirements to deliver the JCS. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment) and Utilities.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
T7	City centre bus improvements phase 3	Overall Growth	Norfolk County Council/ Norwich City Council	6	Norfolk County Council • DfT • Growth Point • Developer contributions	2021 - 2026	NATS
T8	Bus Rapid Transit via Fakenham Road - A1067 - Phase 3	Broadland Fringe Growth	Norfolk County Council/ Norwich City Council	2.5	Norfolk County Council DfT • Growth Point Developer contributions	2021-2026	NATS
T9	Bus improvements Dereham Road phase 3	West Growth Location	Norfolk County Council/ Norwich City Council	2.6	Growth Point LTP Developer contributions	2021 - 2026	NATS

T10	Bus Rapid Transit via Yarmouth Road - Phase 3	Broadland Business Park Expansion	Norfolk County Council/ Norwich City Council	2.5	Norfolk County Council • DfT • Growth Point • Developer contributions	2021-2026	NATS
Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
T11	Bus improvements via Salhouse Road and Gurney Road phase 3	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	<u>0.6</u>	Rackheath PoD Developer contributions	2021 - 2026	NATS
T12	Bus Rapid Transit via Norwich airport A140 to City centre - Phase 3	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	2.5	Norfolk County Council DfT ● Growth Point Developer contributions	2021-2026	NATS
	Totals			23.86 31.26			

Infrastructure Framework: Priority 2 projects 2008-2016

Education

The table below lists the Priority 2 infrastructure requirements to deliver the JCS. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
ED3	60 place pre-school	Norwich City	Norfolk County Council	0.54	Developers	2011	Infrastructure Needs and Funding Study
ED4	60 place pre-school	Norwich City	Norfolk County Council	0.54	Developers	2016	Infrastructure Needs and Funding Study

Healthcare

The table below lists the Priority 2 infrastructure requirements to deliver the JCS. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. The Health Authority will take a flexible approach to the provision of hospital beds. Locations will be determined by the Health Authority at a later date. It is presumed funding will come through the AMP.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
HC1	GPs Surgery (3 GPs)	Norwich City	Health Authority	1.03	Health Authority / Developer contribution	2011	Infrastructure Needs and Funding Study
HC2	Dentists surgery (4 Dentists)	Norwich City	Health Authority	1.25	Health Authority / Developer contribution	2016	Infrastructure Needs and Funding Study
HC6	Expansion of existing facilities (2 GPs and 2 Dentists)	Broadland Elsewhere	Health Authority	0.9	Health Authority / Developer contribution	2016	Infrastructure Needs and Funding Study
HC12	Expansion of existing facilities (7 GPs and 7 Dentists)	South Norfolk Elsewhere	Health Authority	3.5	Health Authority / Developer contribution	2016	Infrastructure Needs and Funding Study
HC13	Hospital bed requirements	Overall scale of growth	Health Authority	10	Health Authority / Developer contribution	2016	Infrastructure Needs and Funding Study

Green infrastructure

The table below lists the Priority 2 infrastructure requirements to deliver the JCS. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. Green infrastructure projects are being assessed following completion of the Green Infrastructure Delivery Plan. Open space will be planned in relation to each growth location and planned in line with development.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
N/A	Wensum River Parkway	Overall scale of growth	HEART/ Norwich City Council	0.07	Growth Point	Delivered	Green Infrastructure Steering Group
N/A	Catton Park visitor centre and park improvements	Overall scale of growth	Catton Park Trust/ Norfolk County Council	0.37	Growth Point	Delivered	Green Infrastructure Steering Group
N/A	Whitlingham Country Park Access Improvements	Overall scale of growth	Norfolk County Council	0.12	Growth Point	Delivered	Green Infrastructure Steering Group
N/A	Wooded ridge	Overall scale of growth	Norwich City Council	0.04	Growth Point	Delivered	Green Infrastructure Steering Group
GI 1- 14	Green infrastructure projects and open space	Overall scale of growth	Various	tba	Local authorities • Developers contributions • Other funding sources to be identified	2016	Green Infrastructure Steering Group

Totals		18.36

Infrastructure Framework: Priority 2 projects 2016-2021

Education

The table below lists the Priority 2 infrastructure requirements to deliver the JCS. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
ED1	60 place pre-school	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	0.54	Developer contribution	2021	Infrastructure Needs and Funding Study
ED1	60 place pre-school (co-location with community space)	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	0.54	Developer contribution	2021	Infrastructure Needs and Funding Study
ED1	2FE primary with integrated 60 place nursery	Old Catton, Sprowston, Rackheath and Thorpe St Andrew	Norfolk County Council	5.14	Developer contribution	2021	Infrastructure Needs and Funding Study

		Growth Triangle					
ED1	2FE primary with integrated 60 place nursery	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	5.14	Developer contribution	2021	Infrastructure Needs and Funding Study
Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
ED5	2FE primary with integrated 60 place nursery	Norwich City	Norfolk County Council	5.14	Developer contribution	2021	Infrastructure Needs and Funding Study
ED5	2FE primary with integrated 60 place nursery	Norwich City	Norfolk County Council	5.14	Developer contribution	2021	Infrastructure Needs and Funding Study

Ref	Scheme	Required for growth in:	Promoter/ Delivery	Total Cost	Funding sources	Estimated delivery dates by	Source
ED9	1400 secondary school with 280 sixth form places co-located with 4 x indoor sports courts phase 1	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	26	Developer contribution	2021	Infrastructure Needs and Funding Study
ED7	60 place pre-school	Easton	Norfolk County Council	0.54	Developer contribution	2021	Infrastructure Needs and Funding Study
ED7	60 place pre-school	Hethersett	Norfolk County Council	0.54	Developer contribution	2021	Infrastructure Needs and Funding Study
ED7	2FE primary with integrated 60 place nursery	Wymondham	Norfolk County Council	5.14	Developer contribution	2021	Infrastructure Needs and Funding Study
ED7	30 place pre-school	Wymondham	Norfolk County Council	0.285	Developer contribution	2021	Infrastructure Needs and Funding Study

			body	£m			
ED10	Expanded secondary school provision	Wymondham, Hethersett, Cringleford, Costessey / Easton	Norfolk County Council	10	Developer contribution	2021	Infrastructure Needs and Funding Study and ongoing assessment of options

Healthcare

The table below lists the Priority 2 infrastructure requirements to deliver the JCS. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. The Health Authority will take a flexible approach to the provision of hospital beds. Locations will be determined by the Health Authority at a later date. It is presumed funding will come through the AMP.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
HC3	Expansion of existing facilities (6 GPs and 5 Dentists)	Norwich City	Health Authority	4.5	Health Authority / Developer contribution	2021	Infrastructure Needs and Funding Study
HC4	Primary Care Centre (5 GPs and 4 Dentists)	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Health Authority	3.35	Health Authority / Developer contribution	2021	Infrastructure Needs and Funding Study
НС7	Expansion of existing facilities (3 GPs and 2 Dentists)	Wymondham	Health Authority	1.8	Health Authority / Developer contribution	2021	Infrastructure Needs and Funding Study

HC9	Expansion of existing facilities (1 GP and 1Dentists)	Hethersett	Health Authority	0.55	Health Authority / Developer contribution	2021	Infrastructure Needs and Funding Study
Ref	Scheme	Dependencies	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
HC11	Expansion of existing facilities (1 GP and 1Dentist)	Easton / Costessey	Health Authority	0.55	Health Authority / Developer contribution	2021	Infrastructure Needs and Funding Study
HC13	Hospital bed requirements	Overall scale of growth	Health Authority	6	Health Authority / Developer contribution	2021	Infrastructure Needs and Funding Study

Green infrastructure

The table below lists the Priority 2 infrastructure requirements to deliver the JCS. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. Green infrastructure projects are being assessed following completion of the Green Infrastructure Delivery Plan. Open space will be planned in relation to each growth location and planned in line with development.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	 Funding sources	Estimated delivery dates by	Source

GI 1- 14	Green infrastructure projects and open space	Various	tba	Local authorities Developers contributions Other funding sources to be identified	2021	Green Infrastructure Steering Group	
	Totals		40.19 80.90				

Infrastructure Framework: Priority 2 projects 2021-2026

Education

The table below lists the Priority 2 infrastructure requirements to deliver the JCS. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
ED2	60 place pre-school	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	County Council	0.54	Developer contribution	2026	Infrastructure Needs and Funding Study

ED2	2FE primary with integrated 60 place nursery	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	5.14	Developer contribution	2026	Infrastructure Needs and Funding Study
ED2	2FE primary with integrated 60 place nursery		Norfolk County Council	5.14	Developer contribution	2026	Infrastructure Needs and Funding Study
ED6	60 place pre-school co-located with 600sqm combined community centre and library	Norwich City	Norfolk County Council	0.54	Developer contribution	2026	Infrastructure Needs and Funding Study
Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
ED8	60 place pre-school	Wymondham	Norfolk County Council	0.54	Developer contribution	2026	Infrastructure Needs and Funding Study
ED8	2FE place primary	Cringleford	Norfolk County	2.3	Developer contribution	2026	Infrastructure Needs and Funding Study

			Council				
ED8	1 FE place primary	Hethersett	Norfolk County Council	2.3	Developer contribution	2026	Infrastructure Needs and Funding Study
ED8	60 place pre-school	Long Stratton	Norfolk County Council	0.54	Developer contribution	2026	Infrastructure Needs and Funding Study
ED9	1400 secondary school with 280 sixth form places co- located with 4 x indoor sports courts phase 2	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	13	Developer contribution	2026	Infrastructure Needs and Funding Study
ED8	2FE primary with integrated 60 place pre-school co-located with combined community centre and library	Long Stratton	Norfolk County Council	5.14	Developer contribution	2026	Infrastructure Needs and Funding Study
ED8	60 place pre-school	Cringleford	Norfolk County Council	0.54	Developer contribution	2026	Infrastructure Needs and Funding Study
ED8	1FE primary	Easton	Norfolk County Council	2.5	Developer contribution	2026	Infrastructure Needs and Funding Study

Ref	Scheme	Required for	Promoter/	Total		Estimated	
	Constitution	growth in:	Delivery body	Cost	Funding sources		Source
ED10	Expanded secondary school provision	Wymondham, Hethersett, Cringleford, Costessey / Easton, Long Stratton, rest of South Norfolk NPA	Norfolk County Council	10	Developer contribution	2026	Infrastructure Needs and Funding Study and ongoing assessment of options

Healthcare

The table below lists the Priority 2 infrastructure requirements to deliver the JCS. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. The Health Authority will take a flexible approach to the provision of hospital beds. Locations will be determined by the Health Authority at a later date. It is presumed funding will come through the AMP.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
HC5	Primary Care Centre (5 GPs and 4 Dentists)	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Health Authority	3.35	Health Authority / Developer contribution	2026	Infrastructure Needs and Funding Study
HC8	Combined surgery (2 GPs and 2 Dentists)	Long Stratton	Health Authority	1.5	Health Authority / Developer	2026	Infrastructure Needs and Funding Study

					contribution		
HC10	Expansion of existing facilities (1 GP and 1 Dentists)	Cringleford	Health Authority	0.55	Health Authority / Developer contribution	2021 - 2026	Infrastructure Needs and Funding Study
Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
HC12	Expansion of existing facilities (1 GP)	South Norfolk Elsewhere	Health Authority	0.6	Health Authority / Developer contribution	2026	Infrastructure Needs and Funding Study
HC13	Hospital bed requirements	Overall scale of growth	Health Authority	12	Health Authority /	2026	Infrastructure Needs and Funding Study

Green infrastructure

The table below lists the Priority 2 infrastructure requirements to deliver the JCS. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. Green infrastructure projects are being assessed following completion of the Green Infrastructure Delivery Plan. Open space will be planned in relation to each growth location and planned in line with development.

Ref	Scheme	Required growth in:	for	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
GI 1- 14	Green infrastructure projects and open space	Overall scale growth	of	Various	tba	Local authorities • Developers contributions • Other funding sources to be identified	2026	Green Infrastructure Steering Group

		<u>39.05</u>
Totals		66.22

Infrastructure Framework: Priority 3 projects 2008-2016

Community facilities

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
CF1	Community facilities	Old Cattor Sprowston, Rackheath an Thorpe St Andre	District Council	0.5	Private companies Developers Local	2011-16	Infrastructure Needs and Funding Study

		Growth Triangle			authorities		
CF2	Community facilities	Norwich	Norwich City Council	1	Private companies Developers Local authorities	2011-16	Infrastructure Needs and Funding Study
CF3-5	Community facilities	South Norfolk	South Norfolk Council	4	Private companies Developers Local authorities	2011-16	Infrastructure Needs and Funding Study
				<u>5</u>]		
	Totals			5.50			

Infrastructure Framework: Priority 3 projects 2016-2021

Community facilities

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
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CF1	Community facilities	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Broadland District Council	2	Private companies Developers Local authorities	2016 - 2021	Infrastructure Needs and Funding Study
CF2	Community facilities	Norwich	Norwich City Council	3.05	Private companies Developers Local authorities	2016 - 2021	Infrastructure Needs and Funding Study
CF3-5	Community facilities	South Norfolk	South Norfolk Council	3.1	Private companies Developers Local authorities	2016 - 2021	Infrastructure Needs and Funding Study

Community services

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
-----	--------	-------------------------	-------------------------------	---------------------	-----------------	-----------------------------	--------

CI 12	Fire Service	Overall growth	scale	of	Norfolk County Council	tba	Norfolk County Council / Developer contribution	2016-2021	Infrastructure Needs and Funding Study
CI13	Ambulance Service	Overall growth	scale	of	Norfolk Ambulance Service	tba	Norfolk Ambulance Service / Developer contribution	2016-2021	Infrastructure Needs and Funding Study
CI 1- 11	Police Safer Neighbourhood teams - Broadland (18 officers) • Norwich (22 officers) • South Norfolk (32 officers)	Overall growth	scale	of	Norfolk Constabulary	5.25	Norfolk Constabulary / Developer contribution	2016-2021	Infrastructure Needs and Funding Study
						11.40			

Totals

13.40

Infrastructure Framework: Priority 3 projects 2021-2026

Community facilities

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
CF-1	Community facilities	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Broadland District Council	2	Private companies Developers Local authorities	2021-2026	Infrastructure Needs and Funding Study
CF 2	Community facilities	Norwich	Norwich City Council	3.05	Private companies Developers Local authorities	2021-2026	Infrastructure Needs and Funding Study
CF 3- 5	Community facilities	South Norfolk	South Norfolk Council	3.1	Private companies Developers Local authorities	2021-2026	Infrastructure Needs and Funding Study

Community services

Ref	Scheme	Required growth in:	for	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
CI 12	Fire Service	Overall scale growth	of	Norfolk County Council	ТВА	Norfolk County Council / Developer Contribution	2021-2026	Infrastructure Needs and Funding Study
CI 13	Ambulance Service	Overall scale growth	of	Norfolk Ambulance Service	ТВА	Norfolk Ambulance Service / Developer contribution	2021-2026	Infrastructure Needs and Funding Study
CI 1- 11	Police Safer Neighbourhood teams - Broadland (18 officers) • Norwich (44 officers) • South Norfolk (64 officers)	Overall scale growth	of	Norfolk Constabulary	5.25	Norfolk Constabulary / Developer Contribution	2021 - 2026	Infrastructure Needs and Funding Study

Totals			13.4
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Ref	Page	Policy/ Paragraph	Main Modification								
MM7	-	New Section	Insert new Appendix 7a, to follow Appendix 7								

Appendix 7a: Implementation Framework and Critical Path inside the Broadland part of the Norwich Policy Area

The framework lists infrastructure required to facilitate development promoted in this JCS. It is early work and is not intended to be an exhaustive or precise list of the entire infrastructure that will be needed by 2026. Additional infrastructure will be needed beyond this date, including in the growth triangle where at least 3,000 dwellings are proposed after 2026. This table was correct at June 2013 and relates only to infrastructure that is required to deliver any aspect of the plan that was previously remitted. Updated information on the schemes listed is contained within the published LIPP available on the GNDP website.

The GNDP will manage a delivery programme supporting the implementation of this JCS. The programme will be developed through the Local Investment Plan and Programme (LIPP). As decisions are made locally and nationally on prioritisation and funding of infrastructure, the content, phasing and priorities of this list will be amended accordingly. This will happen via the LIPP process which will be subject to regular review.

The definition of the three levels of priority is derived from the Greater Norwich Infrastructure Needs and Funding Study (INF 1; in particular see Page 194) but expands the Study's definition to explicitly recognise the differential impact on the overall strategy. Consequently, the categories are:

Priority 1 Infrastructure is fundamental to the strategy or must happen to enable physical growth. It includes key elements of transport, water and electricity infrastructure and green infrastructure requirements from the Habitats Regulation Assessment. Failure to deliver infrastructure that is fundamental to the strategy would have such an impact that it would require the strategy to be reviewed. This particularly applies to the NDR and the associated package of public transport enhancement. The sustainable transport requirements of the strategy and much of the development to the north of the built up area is dependent on these key elements of NATS.

Priority 2 Infrastructure is essential to significant elements of the strategy and required if growth is to be achieved in a timely and sustainable manner. Failure to address these infrastructure requirements is likely to result in the refusal of planning permission for individual growth proposals, particularly in the medium term as pressures build and any existing capacity is used up.

Priority 3 Infrastructure is required to deliver the overall vision for sustainable growth but is unlikely to prevent development in the short to medium term. The overall quality of life in the area is likely to be poorer without this infrastructure.

Failure to address these infrastructure requirements is likely to result in the refusal of planning permission for individual growth proposals.

Table 1 – Infrastructure Framework shows infrastructure requirements to support growth across the JCS period.

Table	1 – Infrastructure Framewo	ork									
Infras	nfrastructure Framework: Priority 1 projects 2008 – 2016										
	se date for the Strategy is 20 st 5 years of delivery post add				elivered from th	ne base date	e up to 2016				
that a	ble below lists the Priority are viewed as priority 1 sment) and Utilities										
Ref	Scheme	Required for growth in	Promoter/ delivery body	Total cost £m	Funding sources	Estimate d delivery dates by	Source				
Waste	water										
SP1	Sewerage upgrade – Anglian Water propose a north east trunk sewer to manage growth in the north east as a result of the detailed study 'Water Cycle Study 2B'	Overall scale of growth in particular: Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Developer	61.6 (acros s whole period)	AW provision/ Developer	in phases up to 2026					
Green	Infrastructure										

GI16	Retention and re-creation of Mousehold Heath and link to the surrounding countryside	Overall scale of growth in particular: Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Local Authorities/ Developer	0.033	Local authority/ CIL/ On-site design	2016	Green Infrastructu re Delivery Plan
GI17	Broads Buffer Zone	Overall scale of growth in particular: Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Local Authorities/ Developer	0.21	Local authority/CIL /Developer land contributions	2016	Green Infrastructu re Delivery Plan
Transp	ortation				I		
T1	Norwich Northern Distributor Road	Overall scale of growth in particular: Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle Broadland: Smaller	Norfolk County Council	107 (spend up to 2016)	DFT £67.5m /CIL /Norfolk County Council	2016 (continue s to 2021)	NATS

		sites in the NPA (2000 dwellings) depending on site specifics Norwich Area Transportation Strategy including delivery of BRT Airport employment allocation					
T2a	Postwick Junction improvements	Overall scale of growth in particular: Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle Norwich Area Transportation Strategy including delivery of NDR and expanded Postwick Park and Ride Broadland Business Park and expansion	Norfolk County Council	21.0	DfT funding /Norfolk County Council	2016	NATS
T11	Bus Rapid Transit via Salhouse Road and Gurney Road	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	1.8	Rackheath PoD (Broadland District Council)/ Norfolk County Council/ DfT /CIL	2016	NATS

T15	Completion of local development Link Road	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Developer Lead	2.5	Developer contributions	2016	NATS
Infras	tructure Framework: Priori	ty 1 projects 2016 -2021					
that a	ble below lists the Priority are viewed as priority 1 sment) and Utilities						
Ref	Scheme	Required for growth in	Promoter/ delivery body	Total cost £m	Funding sources	Estimate d delivery dates by	Source
Waste	Water			,			
SP1	Sewerage upgrade - north east trunk sewer	Overall scale of growth in particular: Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	AW/ Developer	See 2008- 16 period	AW provision/ Developer	in phases up to 2026	
Utilitie	2S						
U2	New primary substation on new site (Norwich Airport		UK Power	6.3	UKPN	2021	Infrastructu re Needs

	north)	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Networks				and Funding Study 2009
U3	New grid sub-station on existing sites (Norwich East)	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	UK Power Networks	17	100% AMP funded	2021	Infrastructu re Needs and Funding Study 2009
Green	Infrastructure			,			
GI 16	Retention and re-creation of Mousehold Heath to the surrounding countryside	Overall scale of growth in particular: Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Local authorities/ Developers	0.033	Local authority/ CIL/ On-site design	2021	Green Infrastructu re Delivery Plan
GI 17	Broads Buffer Zone	Overall scale of growth in particular: Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Local authorities/ Developers	0.21	Local authority/CIL /Developer land contributions	2021	Green Infrastructu re Delivery Plan
Transp	port			I			
T1	Norwich Northern Distributor Road	Overall scale of growth in particular: Old Catton,	Norfolk County Council	13 (spend	Norfolk County Council	2016 to 2021	NATS

		Sprowston, Rackheath, and Thorpe St Andrew Growth triangle Broadland: Smaller sites in the NPA (2000 dwellings) depending on site specifics Norwich Area Transportation Strategy including delivery of BRT Airport employment allocation		after 2016)			
T2b	Postwick Park and Ride	Overall scale of growth in particular: Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council	6	Remaining Growth Point funding / CIL	2021 (earliest possible delivery 2015)	NATS
T11	Bus improvements via Salhouse Road and Gurney Road	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	2.6	Rackheath PoD / Norfolk County Council / CIL	2021	NATS
T12	Bus Rapid Transit via Norwich airport A140 to City centre	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	2.5	Norfolk County Council/ DfT /CIL	2021	NATS

T15	Completion of local Development Link Road	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	•	2.5	Developer contributions	2021	NATS			
Infrast	Infrastructure Framework: Priority 1 projects 2021 -2026									
that a	ble below lists the Priority ire viewed as priority 1 ment) and Utilities									
SP1	Sewerage upgrade - north east trunk sewer	Overall scale of growth in particular: Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	AW/ Developer	See 2008- 16 period	AW provision/ Developer	in phases up to 2026	•			
Electri	city									
U4	New primary substation on new site (Sprowston / Rackheath)	Old Catton, Sprowston, Rackheath, and Thorpe St Andrews growth triangle		4.3	UKPN / CIL	2026	Infrastructu re Needs and Funding Study 2009			
Green	Green Infrastructure									

GI 16	Retention and re-creation of Mousehold Heath to the surrounding countryside	Overall scale of growth in particular Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle		0.033	Local authority/ CIL/ On-site design	2026	Green Infrastructu re Delivery Plan
GI 17	Broads Buffer Zone	Overall scale of growth in particular Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle		0.21	Local authority/CIL /Developer land contributions	2026	Green Infrastructu re Delivery Plan
Transp	ortation						
T11	Bus improvements via Salhouse Road and Gurney Road	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	0.6	Rackheath PoD / Norfolk County Council/ DfT /CIL	2026	NATS
T12	Bus Rapid Transit via Norwich airport A140 to City centre	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	7.5	Norfolk County Council/ DfT /CIL	2026	NATS
Total				256.9			

Infrastructure Framework: Priority 2 projects 2008-2016

The table below lists the Priority 2 infrastructure requirements to deliver the JCS. The three categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure The Health Authority will take a flexible approach to the provision of hospital beds. Locations will be determined by the Health Authority at a later date. It is presumed funding will come through the AMP.

NOTE: All schools in the period 2008-16 are expected to be covered by S106 or are covered by Children's Services funding

Infrastructure Framework: Priority 2 projects 2016-2021

Education

ED1	60 place pre-school	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle		0.54	Childrens Services/CIL	2021	Infrastructu re Needs and Funding Study 2009
ED1	60 place pre-school (co- location with community space)			0.54	Childrens Services/CIL	2021	Infr Needs and Funding Study 2009
ED1	2FE primary with integrated 60 place nursery	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	5.14	Childrens Services/CIL	2021	Infr Needs and Funding Study 2009
ED1	2FE primary with integrated 60 place	Old Catton, Sprowston, Rackheath and Thorpe St		5.14	Childrens	2021	Infr Needs and

	nursery	Andrew Growth Triangle	Council		Services/CIL		Funding Study 2009
ED9	1400 secondary school with 280 sixth form places co-located with 4 x indoor sports courts Phase 1	Rackheath and Thorpe St		13	Childrens Services/CIL	2021	Infr Needs and Funding Study 2009
HC4	Primary Care Centre (5 GPs and 4 Dentists)	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle		3.35	Health Authority	2021	Infr Needs and Funding Study 2009

Infras	tructure Framework: Prior	ity 2 projects 2021-2026				
Educa	tion					
ED2	60 place pre-school	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	0.54	Childrens Services/CIL	2026	Infrastructu re Needs and Funding Study 2009
ED2	2FE primary with integrated 60 place nursery	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	5.14	Childrens Services/CIL	2026	Infrastructu re Needs and Funding Study 2009

ED2	2FE primary with integrated 60 place nursery	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	5.14	Childrens Services/CIL	2026	Infrastructu re Needs and Funding Study 2009
ED9	1400 secondary school with 280 sixth form places co-located with 4 x indoor sports courts phase 2	Rackheath and Thorpe St		13	Childrens Services/CIL	2026	Infrastructu re Needs and Funding Study 2009
HC5	Primary Care Centre (5 GPs and 4 Dentists)	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle		3.35	Health Authority	2026	Infrastructu re Needs and Funding Study 2009

The table below lists the Priority 3 infrastructure requirements to deliver the JCS. The 2 categories of infrastructure that are viewed as Priority 3 are Community facilities and Community services.

Community facilities: 2013-2016

CF1	Community	Old Catton, Sprowston,	Broadland	0.54	Private	2016	Infrastructure
GI I	facilities 300 sq metres community space	Rackheath and Thorpe St Andrew Growth Triangle			companies / Developers / Local authorities/ CIL	2010	Needs and Funding Study 2009

Community facilities: 2016-2021

CF	1	Community	Old Catton, Sprowston,	Broadland	1.44	Private	2021	Infrastructure
		facilities	Rackheath and Thorpe St Andrew Growth Triangle	District Council		companies / Developers		Needs and Funding
		600 sq metres community space	Amarew Growth Fridingie	Council		/ Local authorities/ CIL		Study 2009

Community facilities: 2021-2026

CF 1	Community	Old Catton, Sprowston,	Broadland	2.54	Private	2026	Infrastructure
	facilities	Rackheath and Thorpe St	District		companies /		Needs and
		Andrew Growth Triangle	Council		Developers		Funding
					/ Local		Study 2009
					authorities/		
	300sq metres of				CIL		
	community space						
	plus 4 indoor sports						

_				
	a a comba			
	courts			

Ref	Page	Policy/ Paragraph	Main Modification
MM8	-	New Section	Insert new Appendix 8a, to follow Appendix 8

Appendix 8a – Additional monitoring framework for the Broadland part of the Norwich Policy Area

Spatial Planning Objective 1: To minimise the contributors to climate change and address its impact.

Policy: 1, 3, 5, 6, 7, 9, 10, 11, 12, 13, 14, 18, 19

Indicator (& type)	Main Agencies	Targets	Source
Percentage of residents who travel to work:	Norfolk County Council /	Decrease in a) and increase in b), c) and	ONS
a) by private motor vehicle;	,	d) over plan period	(Census)
b) by public transport;			
c) by foot or cycle; and			
d) work at or mainly at home.			

Spatial Planning Objective 2: To allocate enough land for housing, and affordable housing, in the most sustainable settlements.

Policy: 4, 9, 10, 11, 12, 13, 14, 15, 16, 17, 19, 20, 21, 22

Indicator (& type)	Main Agencies	Targets	Source
Housing land supply within Broadland part of the NPA	LPAs/Developers	To have more than 90% of the required deliverable housing land (as defined in current national policy) in the rolling 5-year supply of housing land (plus the 'additional buffer' required in current national policy).	LPAs

Spatial Planning Objective 4: To promote regeneration and reduce deprivation

Policy: 5, 6, 7, 9, 10, 11, 12, 19, 20

Indicator (& type)	Main Agencies	Targets	Source
Unfit housing – percentage of overall housing stock not meeting "Decent Homes Standard"	LAs	Decrease over plan period	LAs

Spatial Planning Objective 7: To enhance transport provision to meet the needs of existing and future populations while reducing travel need and impact

Policy: 3, 6, 7, 9, 10, 12, 13, 14, 15, 16, 17, 19, 20

Indicator (& type)	Main Agencies	Targets	Source
Percentage of residents who travel to work: a) by private motor vehicle;	Norfolk County Council / Developers / LPAs	Decrease in a) and increase in b), c) and d) over plan period	ONS (Census)
b) by public transport;			
c) by foot or cycle; and			
d) work at or mainly at home.			

Spatial Planning Objective 8: To positively protect and enhance the individual character and culture of the area.

Policy: 2, 5, 7, 8, 10, 11, 12, 13, 14, 15, 16, 17, 18, 20

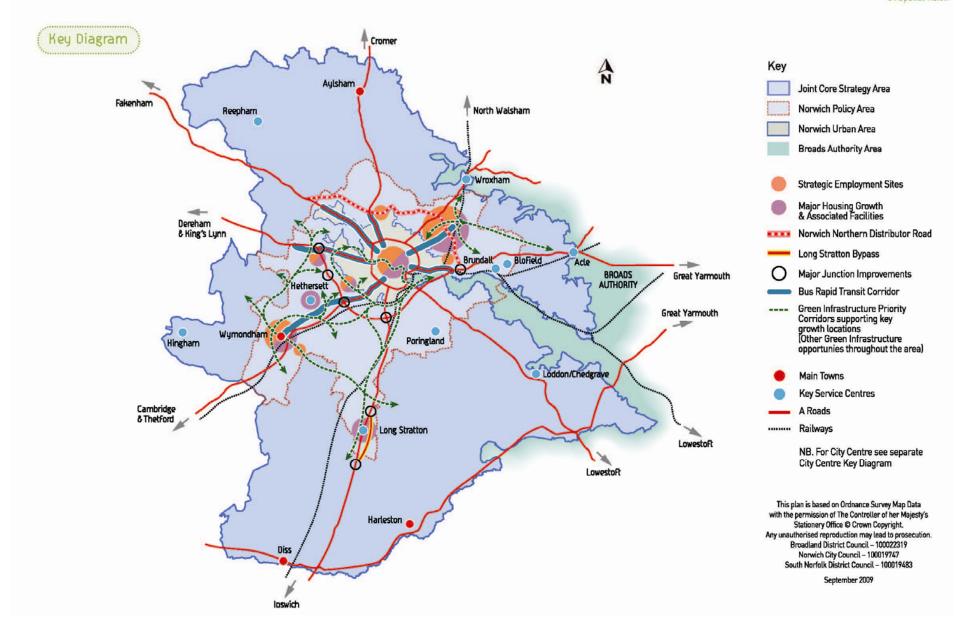
Indicator (& type)	Main Agencies	Targets	Source

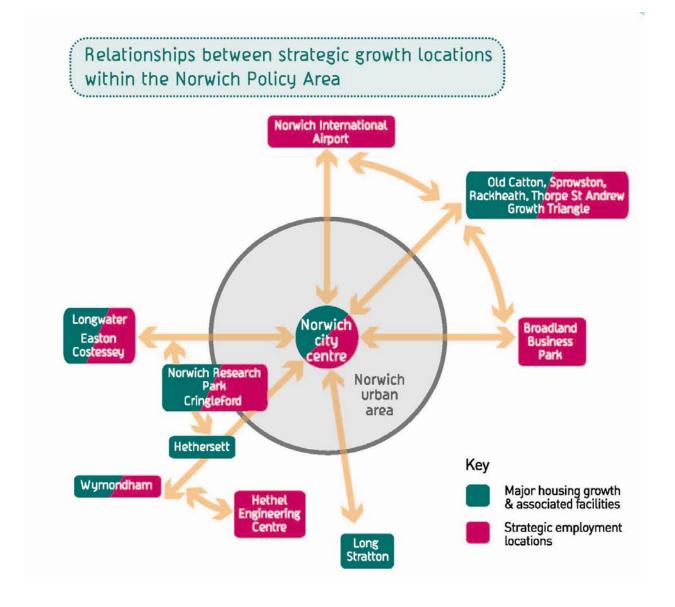
Heritage at risk – number and percentage of:	LPAs	Year on year reduction	LPAs
a) Listed Buildings; and			
b) Scheduled Ancient Monuments			
on Buildings at Risk Register			

Spatial Planning Objective 9: To protect, manage and enhance the natural, built and historic environment, including key landscapes, natural resources and areas of natural habitat or nature conservation value.

Policy: 1, 3, 5, 10, 11, 12, 13, 14, 15, 16, 17, 18, 20

Indicator (& type)	Main Agencies	Targets	Source
Heritage at risk – number and percentage of:	LPAs	Year on year reduction	LPAs
a) Listed Buildings; and			
b) Scheduled Ancient Monuments			
on Buildings at Risk Register			

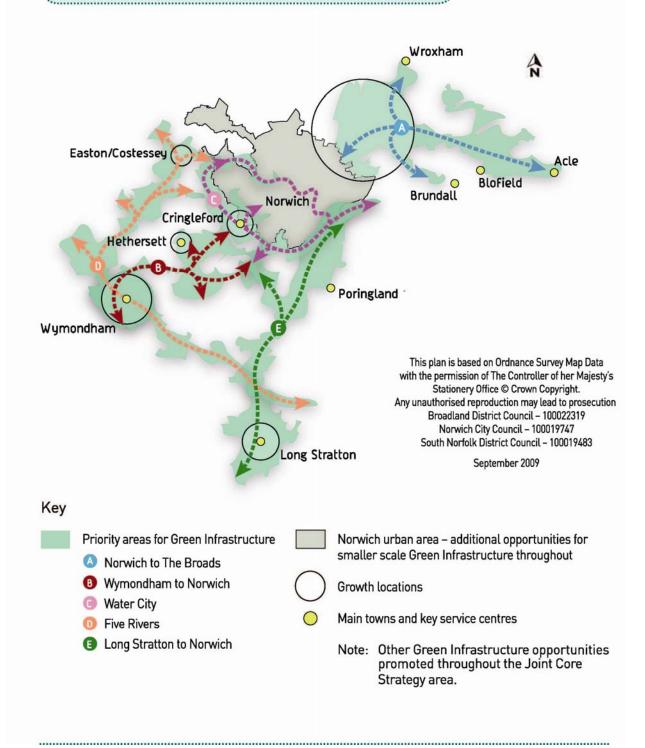




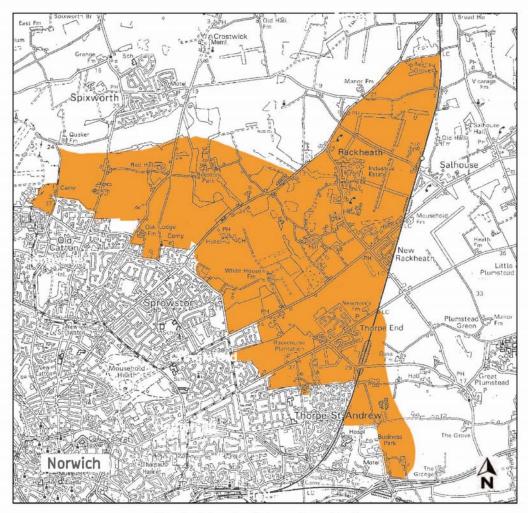
This plan is based on Ordnance Survey Map Data with the permission of The Controller of her Majesty's Stationery Office © Crown Copyright. 300 Aylsham Any unauthorised reproduction may lead to prosecution. Broadland District Council - 100022319 Norwich City Council - 100019747 South Norfolk District Council - 100019483 100-200 Reepham September 2009 100-200 Wroxham 2000 Broadland 10,000 100-200 1000 Easton Costessey Acle 3,000 Norwich City Council 1,200 1,000 Cringleford Hethersett 100 Hingham 1800 South Norfolk 100-200 Loddon 2,200 Jymondham 1,800 Long Stratton 200-300 Harleston 300 Diss Key Joint Core Strategy Area Proposed Housing Norwich built-up area in unspecified Norwich Policy Area locations in the Old Catton, Sprowston, Rackheath, Thorpe St. Norwich Policy Area Proposed New Housing Andrew Growth Triangle

Main Housing Allocations

Green infrastructure priority areas supporting key growth locations



Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle



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Broadland District Council – 100022319

Norwich City Council – 100019747

South Norfolk District Council – 100019483

September 2009

Integrated impact assessment



The IIA should assess the impact of the recommendation being made by the report

Detailed guidance to help with completing the assessment can be found here. Delete this row after completion

Report author to complete	
Committee:	Cabinet
Committee date:	11 th December 2013
Head of service:	Graham Nelson
Report subject:	Adoption of JCS for Broadland, Norwich and South Norfolk, the Broadland part of the Norwich Policy Area Local Plan
Date assessed:	13 th November 2013
Description:	Report to request Cabinet recommends Council resolve to adopt the part JCS

		Impact		
Economic (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Finance (value for money)	\boxtimes			
Other departments and services e.g. office facilities, customer contact				
ICT services				
Economic development				Adoption of the plan will assist in the economic growth of the wider Norwich area, which will be of benefit to Norwich itself.
Financial inclusion	\boxtimes			
Social (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Safeguarding children and adults				
S17 crime and disorder act 1998	\boxtimes			
Human Rights Act 1998	\boxtimes			
Health and well being				

	Impact			
Equality and diversity (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Relations between groups (cohesion)				
Eliminating discrimination & harassment				
Advancing equality of opportunity				
Environmental (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Transportation				Adoption of the strategy will assist in the delivery of the bus rapid transit network both in Norwich and the wider Norwich area.
Natural and built environment				Adoption of the strategy will assist in the delivery of the green infrastructure network in the wider Norwich area which will have benefits for people and nature in Norwich.
Waste minimisation & resource use				
Pollution				
Sustainable procurement				

	Impact					
Energy and climate change				Adoption of the strategy will assist in the delivery of energy efficient new development and sustainable energy generating capacity in the wider Norwich area, will promote the development of bus rapid transit and will help to create green infrastructure networks to enable adaption and increased resilience to climate change.		
(Please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments		
Risk management						
Recommendations from impact assessment						
Positive						
Adoption of the strategy will assist in p of benefit to Norwich in enabling green				vironmental improvements to the north-east of Norwich which will be sit networks to be developed.		
Negative						
Neutral						

Issues		