

## Greater Norwich Development Partnership

### Matter 1 (A) Legal requirements and (B) The spatial vision and the spatial planning objectives (JCS parts 01 & 04, including the key diagram at p29)

**Note:** EIP93 sets out the minor changes to the text of JCS1 to address revocation of the Regional Spatial Strategy.

#### (A) Legal requirements:

A1 Has the Joint Core Strategy (JCS) been prepared in accordance with the relevant Local Development Schemes?

1. The Local Development Scheme: Broadland (2010, JCS 16.1) includes a profile of the JCS (page 13). The profile is valid, although the timing of the Examination means adoption is likely to be slightly later than previously anticipated, and it is no longer necessary to conform to the Regional Spatial Strategy.
2. The Local Development Scheme: Norwich (2010, JCS 16.2) includes a profile for the JCS (page 10). The profile is valid, although the timing of the Examination means adoption is likely to be slightly later than previously anticipated, and it is no longer necessary to conform to the Regional Spatial Strategy.
3. The Local Development Scheme: South Norfolk (2007, JCS 16.3) provides a profile of the purpose and status of, area covered and production timetable for the JCS (Appendix 2/ p24). The profile is valid, although the timing of the Examination means adoption is likely to be slightly later than previously anticipated, and it is no longer necessary to conform to the Regional Spatial Strategy.

A2 Does the evidence (including the Regulation 30(d) and 30(e) statements and the GNDP's self-assessment paper) show that the JCS has been prepared in compliance with the Councils' Statements of Community Involvement?

1. The Statement of Compliance with Adopted SCIs (JCS5) sets out how the process has addressed the requirements of the partner authorities' Statements of Community Involvement. This takes account of the update to the Broadland SCI published in 2008 (JCS

5.2, which updates JCS 5.1, reflecting changes in the plan making system introduced by amended regulations published in 2008), the SCI's for Norwich (JCS 5.3) and the SCI for South Norfolk (JCS 5.4). Details of the engagement at Regulation 25 stage (covering technical and public consultations) are set out in JCS 7.1 in compliance with regulations 30 (1) (d). This includes summaries of the methodologies and events held. JCS 10 is a summary of the representations received at the pre-submission publication stage in compliance with regulation 30 (1) (e) (i). The document includes details of the period allowed for representations and details of the local advertisements.

2. Documents JCS 6 to JCS 12 (please note the numerical analysis in JCS 7 contains errors and is replaced by JCS 7.1) also summarises the results of the consultation. JCS 8 includes, from page 171, a section including a summary of the changes made to the document as a consequence of technical consultation at the Regulation 25 stage. JCS 9 includes a corresponding section for the Regulation 25 public consultation, from page 397. In both documents the changes are highlighted in red text.
3. Because the JCS was commenced under previous regulations, there was also a full round of engagement at the issues and options stage. JCS 6 describes the methodology and outcomes.
4. The Soundness Self Assessment (EIP 95) ensures that evidence requirements are met and that we fully comply with statutory requirements.

A3 Has the JCS been prepared in accordance with the requirements of the 2004 Regulations (as amended) including those concerning the publication of the prescribed documents, their local advertisement and availability for inspection, the notification of DPD bodies, and the provision of a list of superseded saved policies?

1. The Soundness Self Assessment (JCS 13) summarises the process through which compliance with the regulations was achieved, with Appendix 1 focusing on legal compliance. The evidence base includes the documents made available for inspection, summaries of the outcome, and the methods used to publicise the JCS at various stages, including the bodies contacted. The documents published can be found at STA 2 (Issues and Options consultation) STA 4 (Technical Regulation 25 consultation), STA 6 (Regulation 25 Public consultation). For the results of consultation at various stages, please see documents JCS 6 to JCS 12 (please note the numerical analysis in document JCS 7 contains errors and is replaced by JCS 7.1). Evidence of individual advertisements, the list of DPD bodies, or letters sent to DPD bodies at particular stages can be produced if

required.

2. Appendix 3 of the submitted JCS (JCS1) includes a list of superseded policies.
3. The regulation 30 (1) (e) statement (JCS 10) summarises the results of the pre-submission publication response.
4. Following issues raised at the exploratory meeting a series of potential focussed changes to the JCS was published for comment in July/August 2010. A report summarising the outcome (EIP 90) was produced to assist the GNDP authorities to decide whether to submit focussed changes to the examination.

A4 Have Sustainability Appraisal (SA) and Appropriate Assessment (AA) been undertaken, the latter under the Habitats Directive?

1. The Sustainability Appraisal of the pre-submission JCS is document JCS 3.
2. The sustainability appraisal process is iterative. SA reports were produced at key stages of the strategy's production in order to guide succeeding stages. The SA reports for the Issues and Options stage, the Preferred Options stage (prepared before the change in the plan making process in 2008), and the Regulation 25 stage documents are EIP 12, EIP 13, and EIP 14 respectively.
3. At the Issues and Options stage a separate summary/ publicity leaflet was published introducing the SA with information on where to find the full document online, and inviting comments on it. The covering letters to general and specific bodies sent in November 2007, highlighted the availability of the SA and invited comments on its scope.
4. At the Regulation 25 stage the availability of the SA was highlighted in the Regulation 25 technical report. The Regulation 25 public consultation was specifically extended in view of the public interest and when it became apparent that the initial mail out had not drawn attention to the ability to comment on the SA explicitly enough.
5. This previous work was independently verified by Scott Wilson. At the Regulation 27 stage a formal SA report, prepared by Scott Wilson, was published (JCS 3).
6. A supplementary SA (EIP 53) was undertaken by Scott Wilson in relation to the published Statement of Focussed Changes (EIP 51) produced in response to the exploratory meeting, examining the impact of the changes compared to the submitted JCS. It was published for comment alongside the Focussed Changes.

7. Following a task 1 test of likely significance (document ENV 1.1), a task 2 Appropriate Assessment under the Habitats Regulations was undertaken (document JCS 14.1)
8. JCS 14.2 includes a statement from Natural England. This response will be updated prior to the Hearings.

A5 Has the JCS had regard to the sustainable community strategies for the area adopted by the County Council, the City Council and the two District Councils?

1. Yes. The vision and objectives were directly derived from those in the Sustainable Community Strategies. These are included within the submission documents at JCS 17.1 to 17. 4
2. From the outset the Local Strategic Partnerships (LSPs) were involved, as can be seen from the Issues and Options report of consultation (JCS 6), appendix 1: workshop on community life issues, and appendix 2 meetings on 7 February 2007, 9 May 2007, 25 July 2007 and 30 January 2008. The Regulation 25 Report of Consultation with Addendum (JCS 7.1) indicates the stakeholder meetings undertaken (appendix N), including joint meetings of (LSPs) held in September 2008, March 2009, May 2009, and June, 2009, the latter two jointly with Local Development Framework working parties.

**(B) The spatial vision and spatial planning objectives (JCS parts 01 & 04 and the key diagram):**

B1 Are the spatial vision and objectives at part 04 of the JCS (and the strategy depicted on the key diagram at p29 of the JCS) justified, effective, and consistent with national policy?

1. In JCS1, the spatial vision and objectives in section 04 should be read in conjunction with the section entitled "Our Strategy" at section 01, which articulates the underlying reasons why growth is needed in the area, and the resultant dilemmas. It highlights some of the challenges faced and the underlying principles running through the Strategy to tackle them. Section 03, the spatial portrait, highlights the characteristics of the area in terms of its environment, demography, economy and communications.
2. The JCS is justified by being consistent with the adopted Sustainable Community Strategies for Norfolk, Broadland, Norwich and South Norfolk, and subsequent testing through the various

consultation exercises. The responses at the Regulation 25 public stage relating to the vision and objectives are summarised in JCS 9 (pages 3 to 31) with the amendments to the vision and objectives made, as a consequence, summarised on pages 405 and 406 of the same document.

3. The Government Office is represented on the monthly GNDP Directors' group meetings and attended the GNDP Policy Group meetings.
4. Government Office did not suggest any conflict with national policies. At the Issues and Options stage they made no substantive comments on the potential spatial vision and objectives. At the Regulation 25 stage the Government Office made a number of comments on the spatial vision and objectives, though none of these challenged the vision's consistency with national policy - the suggestions were more in the nature of potential improvements. There were no representations from the Government Office relating to the spatial vision and objectives at the pre-submission stage.
5. The effectiveness of the spatial vision is demonstrated through the objectives derived from the vision which themselves link to policies in the strategy. Each policy contains a list of the spatial planning objectives to which it contributes.
6. Proposed minor changes (JCS2 and EIP93) address drafting errors and provide clarity.

B2 Was there adequate identification, consultation upon, and testing of 'reasonable alternative' spatial visions and strategies before the formulation of the submitted JCS? Is there a clear audit trail demonstrating the decision-making process by which the spatial vision and objectives of the submitted JCS were arrived at? If (in any aspect) a balance was struck between competing spatial alternatives, is it clear how and why the selected balance was struck?

#### Vision

1. The initial stages of the JCS preparation took the form of a number of workshops including one focussed on vision and objectives. Document STA1, a composite of the topic papers produced at this stage, includes (at electronic page 31) the topic paper covering the spatial vision and objectives. This explains that the need to have regard to the vision and objectives in adopted Sustainable Community Strategies sets parameters but, within those parameters, looked at a range of potential vision and objective statements.

2. The Issues and Options consultation stage included consultation on a potential vision and objectives through the media of the full consultation document and a summary leaflet delivered to all addresses in the strategy area. The main document (STA 2) includes (from page 14) a draft spatial vision followed by draft objectives. While these were not presented in alternative form, questions invited respondents to indicate support or opposition, with an open question inviting suggestions on how the vision or objectives might be changed or improved. The results of the Issues and Options consultation (STA 3/JCS 6) show, in relation to the full questionnaire, an almost two to one level of support over objections for the draft vision. There is also a range of comments in appendix 7, many of which have subsequently been incorporated to strengthen the vision and objectives, while some reflect overall opposition to the Strategy, and others are mutually inconsistent. In relation to the objectives, in the same appendix, the response to question 2 shows a more than 2 to 1 expression of support. With regard to the summary leaflet, the same document records (on page 54) a level of support for the draft vision exceeding 80%, with many of the comments made reflecting those in the responses to the full document. Document STA 3/ JCS 6 lists:
  - workshops held (appendix 1)
  - a number of stakeholder meetings held at the initial stages of strategy preparation including those with LSPs and LSP coordinators (appendix 2)
  - the outcomes of a youth conference all of which helped to highlight specific issues to test the initial drafting of the vision and objectives (appendix 4)
3. The spatial vision and objectives were subject to further testing at the Regulation 25 public consultation stage. Document JCS 7.1 summarises the response (page 107). At this stage there was a more balanced response, though many of the same issues were raised as in previous consultations. Document JCS 9 includes details of the individual submissions made and a response to the individual representations, together with a note of where a change to the strategy would be beneficial. In relation to the question on spatial vision and objectives, the Actions Summary (page 405) indicates how the changes have been incorporated into the strategy between the Regulation 25 and pre-submission publication stages, (though in some cases the amendments have been to policies rather than the vision/objectives).
4. While many of the principles of the vision have remained unchanged, significant elements have changed, particularly those relating to the spatial distribution of development. As the Strategy has progressed from Issues and Options through a draft Preferred Options stage to Regulation 25 and Submission, the spatial aspects of the vision in particular have reflected evolving thinking

in terms of the spatial strategy.

#### Spatial strategy

5. The identification, consultation upon and testing of reasonable alternative spatial strategies and competing growth locations is referred to in EIP86, which refers to the audit trail and Sustainability Appraisal contexts behind the derivation of the favoured growth strategy option in the Norwich Policy Area (NPA).

Within EIP 86:

- Appendix 1: Summarises the audit trail to Option 2+
  - Appendix 2: Details the audit trail showing the consideration of the evolution of growth options
  - Appendix 4: TP8 “Strategy to Accommodate Major Housing Growth in the Norwich Policy Area” – revised Chapter 6 “Evolution of the Favoured Option”.
6. A wide range of alternative criteria were consulted on to define the Settlement Hierarchy.
  7. The distribution of growth (below the level of major growth locations) was considered, as described by TP7: Settlement Hierarchy. This included the consideration of alternative distribution options as shown by TP7, Appendix 3. Housing development provisions for a limited number of individual Main Towns and Key Service Centres, and significant changes to the definitions of “Service Villages” and “Other Villages” deemed to be suitable for sustainable development, were revised in the pre-Submission JCS (JCS 1) following the results of the Regulation 25 technical and public consultations, evidence studies and the settlement hierarchy review of villages.
  8. At the Issues and Options stage there were questions inviting people to comment on the criteria for selection of Main Towns (at that stage referred to as Market Towns) and Key Service Centres. There was substantial agreement with the criteria as recorded in document JCS 6, page 71. This consultation on criteria was used to define the Settlements.
  9. At the Issues and Options stage there was a specific question inviting people to comment on the criteria for defining “secondary rural settlements” suitable to accommodate modest growth. The response at this stage was a declared preference for such settlements to benefit from specific services, with the top 4 being:
    - a. Daytime public transport
    - b. A village hall
    - c. A convenience/food store
    - d. A primary school

(See document JCS6 page 72 for the full analysis)

10. These criteria were those initially adopted to define service villages at the Regulation 25 stage, though by then the secondary rural settlements, a category drawn from the East of England plan, had been divided into Service Villages and Other Villages to take account of local circumstances. Thus the alternative attributes of the rural settlements, deemed suitable to accommodate some modest development, was established through consultation early in the process. At the Regulation 25 stage, the selection of settlements in these categories was generally supported. There were challenges but few, if any, argued that a range of local services was not a relevant consideration in defining them (see JCS 7.1 page 122 and 123).
11. Each iteration of the JCS growth strategy was approved by Members of the GNDP Policy Group, having been informed of the supporting evidence and implications, and considered by the GNDP partner authorities prior to each public or technical consultation.



# Greater Norwich Development Partnership

## **Matter 2 Does the JCS make sound provision for housing delivery? (policy 4 & Appendix 6: the housing trajectory)**

**Note:** EIP93 sets out the minor changes to the text of JCS1 to address revocation of the Regional Spatial Strategy.

### **General Housing**

- A Is the JCS policy on general housing justified, effective and consistent with national policy?

Justification (evidenced and best of reasonable alternatives)

1. The housing target of around 37,000 dwellings is justified by the evidence base as outlined in the Topic Paper: Homes and Housing (EIP 70)
2. Concentration of growth in the Norwich Policy Area is consistent with evidence of need and demand, and maximises opportunities for co-location with jobs and job growth, sustainable transport and access to services.
3. Government policy states that “there is no point in inventing alternatives that are not realistic”(PPS12 para 4.38). Significantly different levels of provision would not be “reasonable alternatives” as lower growth would be inconsistent with the evidence of need and higher growth would be undeliverable. Therefore, either would conflict with Government policy as enshrined in PPS3. In addition, any consideration of alternative provision, without overwhelming evidence, would only have been procedurally possible since the revocation of the RSS. As the overall JCS is designed to deliver the level of provision required, consideration of alternatives would require a return to pre Regulation 25 stage and a major review of the evidence base. This would entail significant delay and additional public expenditure with no evidence to suggest the outcome would be different, if housing needs are to be met.

Effective (deliverable, flexible and able to be monitored)

4. Deliverability will largely be considered under the individual locations. The overall level of growth is higher than the development industry has achieved previously, and is consequently challenging,

and will require active engagement through delivery agencies and the Local Investment Plan and Programme (LIPP) process. Delivering the levels of growth will ultimately be dependent on market demand. Broadly similar rates of growth were achieved in past decades but were reliant on high levels of public sector housing.

5. Subject to overcoming infrastructure and environmental constraints, the JCS is sufficiently flexible to deliver additional growth if there is sufficient demand and the development industry has the capacity. Flexibility is provided by distributing growth to a wide variety of locations at a range of scales. In addition the expression of housing provision in the JCS is intrinsically flexible. For each of the major growth locations and main towns housing provision is expressed both as a minimum and as the number of dwellings to be delivered (rather than allocations to be made). Provision for several of the smaller locations is expressed as a range. This combination of approaches will allow growth to be varied in time or space if the active management of delivery fails to overcome constraints in a timely manner. Future development on unallocated land has not been included but will undoubtedly take place. If demand and developer capacity materialises, unallocated development will be additional growth over and above development on allocated land.

6. Delivery against dwelling provision is part of the normal monitoring regime.

Consistent with national policy

7. The recent Topic Paper: Homes and Housing (EIP70) sets out how the housing provision target in the JCS is consistent with PPS3 requirements.

- B Is the JCS effective and clear about the mechanisms and timescales for achieving a 5-year supply of deliverable housing land in the overall context of the 3 Councils' planned and programmed Local Development Documents (see para 53, PPS3)?

1. The role of a core strategy in 5 year land supply is not clarified in PPS3 or PPS12; however it can be assumed that the core strategy provides the framework to enable subsequent DPDs and development management to manage supply.
2. The GNDP has endeavoured to ensure a JCS is adopted as soon as possible to provide this framework.

3. In the early years of the JCS, delivery will largely result from existing commitment. At the 2008 base date commitment was 14,000 dwellings (in crude terms, just under 7 years supply). This had risen to over 15,000 dwellings in 2009.
4. The JCS encourages timely delivery of additional supply by providing developer and consumer choice through the wide range of locations for residential development at a variety of scales from 10 dwellings to 7,000 across different market areas. Additional variety of scale will be provided as in many cases the scale of growth identified for a location will be delivered by a range of allocations. Additional choice is provided through the floating allocations in the Norwich Policy Area (2,000 in Broadland and 1,800 in South Norfolk).
5. The JCS does not rely on windfall development for supply. Unallocated development will be genuine additional growth if there is a market for it.
6. The JCS does not restrain provision through phasing. The trajectories are indicative and intended to illustrate the ability of the JCS to deliver the growth required.
7. The LIPP process is intended to actively manage implementation to try to ensure constraints are overcome.
8. The mechanism for delivery is through the granting of planning permissions that are consistent with an adopted JCS and the timely production of site allocations DPDs – this is a matter for the individual districts and their LDS's. The process for dealing with an absence of demonstrable supply is set out in PPS3 and does not need repeating in the JCS.

C If the JCS is unsound in relation to general housing policy, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. The JCS is considered to be sound in relation to general housing. Proposed minor changes (JCS 2 and EIP93) address drafting errors and provide clarity.

**Affordable Housing:**

D Is policy 4 (as amended by GNDP Focussed Changes 1-4) justified, effective and consistent with national policy in relation to Affordable Housing (AH)?

1. The Statement of Focussed Changes (EIP 51) strengthens the justification and effectiveness of the policy.
2. In terms of “justified” the robust and credible evidence base has been provided through the viability assessment undertaken by Drivers Jonas Deloitte (EIP 52). In terms of the appropriateness of the approach, there is long standing evidence of the scale of need (document H 3 - in particular chapter 5). The update of the Housing Market Assessment (document H 4) confirms the scale of need for affordable housing of one tenure or another. Therefore in order to meet the needs of the whole community, there needs to be a consistent and vigorous attempt to secure affordable housing where the opportunity arises.
3. In terms of “effective” the deliverability of the policy is demonstrated by the viability assessment (EIP 52). While it is clear that not every site will be able to deliver to the full target percentage (and indeed this was always the underlying assumption in the strategy), a significant proportion will. The policy and supporting text, as redrafted in the Focussed Changes, have been clarified to more explicitly acknowledge the need for flexibility in the proportion of affordable units sought on mixed tenure sites or the balance of tenures, taking account of the availability of public sector support where necessary. This is in line with the recommendation in paragraph 1.4 and chapter 10 of EIP 52.
4. The same document, at para 1.4, states that there is no justification for different targets in different parts of the strategy area, but that a graduated approach to smaller sites’ contributions should be adopted. The Focussed Changes reflect these recommendations
5. The policy and supporting text is considered to be consistent with the national guidance in the Planning Policy Statement 3 published in June, 2010, paragraphs 20 to 30, and in particular, paragraph 29.

E Is the amended AH policy founded on sound evidence in the form of the viability study by Drivers Jonas Deloitte dated July 2010?

1. The GNDP and its constituent authorities believe that the study provides sound evidence. Drivers Jonas Deloitte will justify its research and recommendations.

F Does the JCS fulfil the requirement of PPS3 para 29 for (a) a plan-wide target for the amount of AH to be provided, in terms of both social-rented and intermediate tenures, the size and type of AH, and the approach to developer contributions?

1. Focussed change FC 3 indicates the need for affordable homes over the plan period, and the proportions likely to be required as social-rented and intermediate tenures. This is derived, as described in annex 1 to the published Statement of Focussed Changes (EIP 51), from the evidence base for the strategic housing market assessment (document H 3). This is the only document which clearly separates out (at figure 161 on page 147) the number of affordable houses required to meet the current backlog, the newly arising need for affordable houses, and the share of newly arising need which can be met from within the existing stock (and thus by deduction the amount of newly arising need which will require additional stock). Without this separation there would be a repeated count of the backlog element in projecting across the strategy period. As the annex to the Focussed Changes notes, there are difficulties in forecasting beyond the five year horizon of such studies, but this is regarded as the most robust information available. The update of the five year assessment included in document H 4 (table 7.12) similarly does not separate out the backlog, though in terms of five year totals it largely confirms the findings of the earlier study. Minor amendments to Focussed Change 3 have been proposed to delete references to the Government's Basic Needs Assessment Model and also to remove reference to a blanket 40% affordable housing target, in the light of the graduated approach to small sites.
2. Paragraph 5.25 of the submitted JCS includes an assessment of the house sizes required across the strategy area, but this can only be a short-term snapshot as the table in the evidence base (H 3, figure 161) which enables the backlog to be separated from the newly arising requirement, does not differentiate in terms of house size.

Furthermore, PPS 3, para 29 refers specifically to specifying “the size and type of affordable housing likely to be needed *in particular locations and, where appropriate, on specific sites*”. The evidence base documents do not differentiate in their analysis between different housing market areas in terms of future need because of the shrinking sample size as the overall need is broken down by tenure, size, and geography and consequent reduction in the reliability of conclusions. Figure 150 in document H 3 breaks down the housing requirement by tenure and size, but only for a five year period, and only for the area as a whole, and it is not considered that this would be helpful in light of guidance in PPS 3, Para 29.

The approach to developer contributions as advised by PPS 3 is that affordable housing will be provided on an application site in order to contribute towards a mix of housing but that, where it can be justified, offsite provision or a financial contribution may be accepted. This approach is reflected in part of paragraph 5.29 of the submitted JCS, which would remain unaffected by the Focussed Changes. It would amount to inappropriate detail in a core strategy to specify the means of calculating equivalence, though the housing authorities have experience in such negotiations.

- G National policy in PPS3 excludes housing for sale from the definition of AH, whereas the JCS includes it. Are there any local circumstances to justify this departure from national policy?

1. There is not considered to be a departure from national policy. Annex B of PPS 3 published in 2010 defines affordable housing as including intermediate housing. Intermediate housing is defined as “housing at prices and rents above those of social rent, but below market price or rents, and which meet the criteria set out above. These can include shared equity products (e.g. HomeBuy), other low cost homes for sale and intermediate rent.” The relevant criteria are that the housing should meet the needs of applicable households at a cost they can afford and include provision for the home to remain at an affordable price for future eligible households, or, if the restrictions are lifted, for the subsidy to be recycled for alternative housing provision. The annex goes on to say that “low cost market” housing may not be considered as affordable housing.
2. Thus the important distinction between intermediate products for sale which can be regarded as affordable housing, and “low cost market” housing lies in the extent to which the discount is passed on to future occupiers in housing need when occupation of the property changes.
3. Para 5.28 of the submitted JCS is proposed for deletion in the focussed changes, but the first sentence is retained in the focussed

changes. This defines affordable housing as “housing provided for rent, sale or shared equity at prices permanently below the current market rate, which people in housing needs are able to afford.” This stresses that the discount should be permanent, rather than a windfall for the first occupier, and that it should be directed towards people in housing need.

4. This reflects emerging current practice within the area as set out in paragraphs 6.11 to 6.14 of the update of the Housing Market Assessment (H4). The current practice is for such products for resale to be marketed through Orbit Homebuy Agents who ensure that, when properties provided for discounted sale become available, they are passed on to appropriate candidates in housing need. There have been successful examples of this approach, including the redevelopment of Plumstead hospital where some properties of this nature have been sold on to second occupiers in this way. In this example, occupiers pay 75% of the open market value with no rent to pay on the remaining equity. Through agreements with the promoters, there is a process for agreeing initial and subsequent purchase prices, future occupiers must fulfill the requirements in terms of their need for affordable housing, and resales are subject to a cascade arrangement to ensure that priority is given to those from the relevant local authority area.

H Does the JCS provide sufficient clarity about the phrase ‘appropriate settlements’ in the context of exceptions schemes?

1. The policy, as originally submitted and as proposed in focussed change FC 1, includes a provision for exceptions sites, further elaborated in paragraph 5.30 which remains unchanged as a consequence of the Focussed Changes. This differentiates between allocations to be made in “other villages and above” in the settlement hierarchy, whilst applications will be considered in other locations where appropriate. It is clear that the policy requirement is that such properties should remain “affordable” in perpetuity, and should thus be immune from rights to acquire. PPS 3 includes a footnote to paragraph 30 referring to the Statutory Instrument which designates small rural settlements for enfranchisement and right to acquire purposes. The relevant Statutory Instrument for the East of England is S. I. 1997/623. It is considered unnecessary for the core strategy to repeat this national guidance.

J If the JCS is unsound in relation to AH, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. The GNDP authorities consider the JCS to be sound in this regard, particularly with the inclusion of the Focussed Changes incorporating the minor amendments referred to in response to question F above.
2. Proposed minor changes (JCS2 and EIP93) address drafting errors and provide clarity.

**Gypsies and Travellers:**

K Is policy 4 (as amended by GNDP Focussed Changes 5-7) justified, effective and consistent with national policy?

1. Yes. The Government has indicated it wishes to adopt a different approach to making provision for Gypsies and travellers. It has signalled a number of steps including replacing circular 01/06 with new light touch guidance, introducing stronger planning enforcement powers, encouraging local authorities to provide, in consultation with the local community, an appropriate number of travellers' sites that reflect local and historic demand. These steps are to be taken in parallel with coordinating action across Government to tackle discrimination and poor social outcomes and seeking to remove barriers that stop Gypsies and Travellers from taking part in the Big Society.
2. More critically in this context, the Government has revoked regional spatial strategies which formerly set targets. Targets in the RSS were introduced by a single issue review. This was informed by research undertaken by specialists for EERA. EERA initially considered two possible distributions of pitches across the region. Option 1 was the "distribution based solely on the consultants advice". Option 2 was amended to smooth out the extremes of provision by assigning a minimum of 15 pitches to all the Councils with corresponding reductions in the 4 which would otherwise have the highest targets (without such a redistribution, these 4 would be expected to accommodate around 45% of the total regional provision). Under these different scenarios, the pitch provision 2006 to 2011 would have been:

	Option 1	Option 2
Broadland	1	15
Norwich	5	15
South Norfolk	21	21

3. All three councils attended the examination in public. Based on local evidence, all three accepted the short term level of provision which exceeded the "pure evidence" with RSS targets for Norwich and Broadland reflecting option 2, and that for South Norfolk rising to 28 pitches.



4. There was less consensus about how longer-term need should be assessed.
5. Beyond 2011, the RSS adopted an extrapolation of the 2006 to 2011 rate. When this methodology, which had been questioned during the Examination in Public, was advertised by the Secretary of State, both Norwich City Council and Broadland District Council responded challenging its validity. Both councils considered that although there may be a short term argument for departing from the level of need which had been established through research, simply extrapolating this figure would take the resultant pitch provision further and further from that justified by evidence.
6. As regards transit pitches, the RSS was unclear in terms of the distribution below the county level.
7. Focussed change FC6 outlines subsequent progress in delivering sites.
8. CLG publishes the results of Gypsy and traveller caravan counts. In terms of unauthorized sites, the last five counts are shown in the table below, note a significant proportion of the South Norfolk caravans were on tolerated sites.

	Jan 2008	July 2008	Jan 2009	Jul 2009	Jan 2010
Broadland	3	4	26	16	5
Norwich	0	0	0	0	1
South Norfolk	84	104	65	96	80
South Norfolk (tolerated sites)	68	86	58	79	68

9. This suggests that a simple extrapolation of a regionally defined total, itself based on a redistribution which departs from available evidence and is not an appropriate way to plan longer term provision. Instead the Greater Norwich Housing Partnership is about to engage in a refresh of the evidence supporting the housing market assessment and, in parallel with this, intends to undertake local research into the need for Gypsy and Traveller provision. This work is likely to be undertaken in 2011 and will ultimately be included in the Strategic Housing Market Assessment refresh.

- L If the JCS is unsound in relation to accommodation for gypsies and travellers, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. It follows from the above that the GNDP authorities consider that the plan, incorporating the focussed changes, remains sound.

2. Proposed minor changes (JCS2 and EIP93) address drafting errors and provide clarity.

## Greater Norwich Development Partnership

### **Matter 3a Strategy and locations for major growth in the NPA (policies 9 and 10, and Appendix 5), including consideration of related access & transportation issues (policy 6) and other infrastructure issues**

*Note: EIP93 sets out the minor changes to the text of JCS1 to address revocation of the Regional Spatial Strategy.*

#### **Part A- Overall distribution of growth**

A1 Are the absolute and comparative quantities of growth distributed to the main locations the most appropriate and are they founded on a robust and credible evidence base?

1. The absolute level of housing growth within the strategy area following the revocation of the RSS is discussed in the topic paper EIP70 submitted in response to the request by the inspectors (EIP63)
2. The absolute quantity of land needed for employment purposes, and guidance on strategic distribution, is derived from the Greater Norwich Employment Growth and Sites and Premises study (EC3)
3. The absolute quantity of land required for retail purposes, and guidance on strategic distribution, is derived from the Retail and Town Centres study (EC4). In this instance, because of the effects of the recession, a cautious view was taken regarding levels of potential growth based on more buoyant economic times
4. The share assigned to the NPA was originally derived from the RSS, but is still considered valid in the light of the advice in PPS3 (particularly paragraphs 10, 11, and 36–39; PPG 13 paragraph 13, section 2 and paragraph 19). It also remains valid in light of the findings of the Greater Norwich Housing Market Assessment 2007 (H2) on the distribution of housing need, and in terms of access to major employment areas.
5. The rationale behind the broad distribution of housing growth within the NPA is set out in the Topic Paper “Strategy to Accommodate Major Housing Growth in the Norwich Policy Area” (TP8), updated in EIP 86.
6. The consideration of the main growth locations is clarified in EIP 86. This covers the derivation of the growth strategy Favoured

- Option in the Norwich Policy Area (NPA) and its relationship to public transport opportunities, and clarifies the growth options with references to the considerations of the evidence base.
7. The distribution takes account of responses to the Issues and Options public consultation on 12 potential major growth locations, the Regulation 25 Technical Consultation on 3 major growth options and the Regulation 25 Public Consultation on the Favoured Option (which also referred to the three preceding growth options).
  8. The distribution was also influenced by responses to the above consultations regarding the JCS Vision and Objectives which referred to the distribution of growth and the development of sustainable communities, plus the consideration of the Sustainability Appraisals, the conclusions drawn from the wide range of research and studies listed in the JCS Appendix 2 (and TP8, Appendix 5) and GNDP partner local authority Member wishes.
  9. The comparative quantities of growth reflect the need to provide for a range of sizes and types of sustainable communities in settlements with good access to services, facilities and strategic employment locations, while providing for in particular the needs of Norwich as a major regional centre. The levels of growth provided for reflect the form and character of settlements, having regard to local servicing, infrastructure provision, environmental, housing marketing and economic growth considerations, while reflecting government guidance to concentrate development to enable good accessibility by sustainable means of transport.
  10. The distribution of growth in the main locations takes account of competing factors and is considered to be the most appropriate.

A2 Is this pattern of development deliverable in infrastructure and market terms?

1. The wide range of locations and scales of growth maximises market delivery and minimises the impact of any unforeseen delays in infrastructure delivery. Information on the potential delivery of housing growth in the Norwich Policy Area is shown in Topic Paper Ref: TP8, Chapter 7.3 "Future delivery".
2. The Housing Trajectory shown in the JCS Appendix 6 demonstrates that the housing provision of the JCS can be delivered within the appropriate timescale.
3. The critical strategic infrastructure has been identified by a range of studies supporting the JCS. This is reflected by the revised JCS Appendix 7: Implementation Framework (EIP 84).

4. The GNDP partners are fully committed to developing and managing an infrastructure delivery programme through the Local Investment Plan and Programme (LIPP), which is a draft, and will remain a regularly updated working document (EIP 85).
5. Service providers have been engaged in the production of the JCS and discussions are ongoing with them to deliver the JCS.
6. Updated position statements with regard to water supply and waste water disposal issues will be submitted in advance of the Hearings by Anglian Water, the Environment Agency and Natural England.
7. In market terms, the distribution of housing development provides for the varying housing market areas identified by background evidence in the Greater Norwich Housing Market Assessment (H2) and provides for a variety of scales of development and a spread of locations conveniently situated with good access to essential services and facilities to provide for flexibility in meeting housing market demands.
8. The JCS concentrates significant amounts of development in larger growth locations, which enables more comprehensive access to public transport and sustainable modes to be delivered. There is a reliance on commercial operation of services to new sites. The JCS distribution allows bus operators to better serve new development within existing transport networks on a commercial basis at a lower financial risk. Disaggregated and dispersed growth would lead to the risk of infrastructure requirements for buses, walking and cycling not being delivered in a co-ordinated fashion creating broken networks that do not encourage their use. Detailed planning for public transport requirements will follow when exact locations are known, as this will fundamentally influence what transport provision can be provided.
9. The scale and location of development takes advantage of existing public transport corridors and the scale of growth provides additional market to continue to improve public transport services. EIP88 examines the growth locations and provides an analysis of the existing public transport provision on the main corridors that serve the planned growth (A1074, A11, A140 and North East). It also sets out an assessment of growth, local constraints and expected levels of public transport service for each corridor.
10. The assessment of the new and existing distributions of growth demonstrates that the pattern of development is deliverable in market terms.
11. To support and enhance public transport services, enhancements have been identified for the main corridors. These are set out in

EIP88 section 5. The public transport interventions can be delivered as incremental schemes phased to match the progress of development of the growth locations. Appendixes A to F of EIP 88 indicate how service levels will be enhanced to match growth.

12. The NATS Implementation Plan as shown in the NATS report to County Council (EIP 9 and EIP 10) is well suited to a phased approach to delivery and builds on the significant success of NATS to date, which has an excellent track record of delivering a wide range of infrastructure to aid modal shift. The NATS Implementation Plan is a series of linked schemes that will be coordinated to maximise benefits. In addition to physical bus priority measures, there are other important factors that will encourage modal shift from car to bus. These include new bus shelters, high quality and up-to-date travel information, high quality vehicles (provided by operators) and improved ticketing arrangements. These measures can be delivered flexibly and corridors can benefit from these schemes in advance of bus priority measures. Works are progressing to deliver these measures now.
13. The supplementary paper “Norwich Area Transportation Strategy Implementation Plan – Report in response to Inspectors’ Comments following the Exploratory Meeting” EIP88 refers to the enhancements of public transport, walking and cycling provisions to meet the needs of the proposed pattern of development, as summarised also in Section 5 of the response to the Planning Inspectors’ Requirement No. 3) arising from the Exploratory Meeting of 13 May 2010 (EIP 86 regarding the distribution of growth and the development of public transport opportunities.

A3 What flexibility exists within the overall strategy to accelerate/defer development in particular locations if circumstances make this necessary? Is the JCS sufficiently clear on this point and how such flexibility would be achieved?

1. The wide ranging distribution of growth locations at different scales provides flexibility
2. Flexibility in the provision of housing development is demonstrated by JCS Appendix 6 housing trajectories for the growth locations. These demonstrate that potential delays in the start of development in some locations could be offset by earlier starts elsewhere.
3. JCS Policy 9 (second paragraph) requires the allocation of land to provide for minimum levels of housing growth in the Norwich Policy Area which will provide for additional flexibility in the provision of sites and their delivery.

4. JCS Policy 2 provides for the master planning of defined major development areas and areas of particular complexity to reduce developer uncertainty and encourage their development.
5. The draft Local Investment Plan and Programme (LIPP) (EIP 85) complements the JCS by clarifying the funding required for and timing of the required infrastructure to reduce developer uncertainty

A4 What is meant in practice by para 6.17 (under the heading 'key dependencies') *'There must be a clear commitment to fund and implement key infrastructure as identified in the policy before land is released for major growth'*. Does the JCS clearly identify such key dependencies in respect of each growth location, or effectively identify the mechanism(s) through which such dependencies will be identified?

1. Different degrees of key infrastructure have been identified and related to their criticality in relation to the development of the major growth areas.
2. A revised version of JCS Appendix 7 "Implementation Framework" clarifies the requirements for and provision of key infrastructure in response to this issue (EIP 84) as expanded by the draft LIPP (EIP 85).

A5 Is the aim of the 3<sup>rd</sup> bullet point of policy 9 to convey the objective of 'integrating well with neighbouring areas while also contributing to a higher level of self containment for the host town/community'?

1. This Inspector's matter appears to relate to Policy 10, 3<sup>rd</sup> bullet point, which refers to a "high" level of self containment.
2. This bullet point was intended to apply in general to a range of different types of growth areas and was intended to convey the need for a balance between self-containment and integration.

A6 To demonstrate compatibility with the Community Infrastructure Levy Regulations 2010, should the second sentence of policy 10 read something to the effect that "Development will achieve the highest standards of design and provide for the necessary infrastructure and services which it generates in accordance with the Community Infrastructure Levy Regulations 2010. Some of these improvements may bring knock-on improvements to existing communities."

1. Such an amendment is not considered to be necessary because the

provision of infrastructure may be addressed by funding from a variety of sources and not only by the Community Infrastructure Levy (CIL) (or a development tariff).



# Greater Norwich Development Partnership

## **Matter 3b Old Catton/ Sprowston/ Rackheath/ Thorpe St Andrew growth triangle (part policy 10 and appendix 5)**

**Note:** EIP93 sets out the minor changes to the text of JCS1 to address revocation of the Regional Spatial Strategy.

### **Procedure**

B1 In principle (aside from any comments about its content), do policy 10 and appendix 5 (as amended by GNDP Focussed Changes 8-10, including the concept statement) provide a sound procedural basis for the strategic allocation of the growth triangle and an appropriate level of guidance for taking its development forward in a coordinated way without an AAP through future detailed master planning of the various 'quarters'?

1. The principle of major development in this location is addressed under matter 3 part B2.
2. The proposal for a strategic allocation in the Focussed Changes published for representations was primarily driven by the need to establish a planning framework as quickly as possible, in view of pressures to maintain a five year supply of housing land. A degree of consensus around the Concept Statement included in the focused changes would have given confidence that the SPD route could deliver a framework with a wide degree of "buy in" as quickly as possible. However, having considered the response to the Focused Changes the GNDP authorities took the view that there was unlikely to be the degree of consensus required, and that in light of the probable need for resolution of differing aspirations/ positions, the more formalised route of the Area Action Plan (or another formal part of the process if the Government should revise the plan making system) would be more appropriate.
3. In light of this conclusion, and the decision to revert to the JCS as originally submitted in this regard, with detailed planning to be undertaken through the formal development plan document route, the soundness of the SPD route does not arise.

## Soundness of the proposal

B2 Is this strategic allocation justified, effective and consistent with national policy?

1. Although this is no longer a strategic allocation, it is still necessary to consider the logic of major development in the form of a concentrated urban extension in this location. The selection of the north east as a location for major growth, the concentration approach and the scale of growth proposed is set out in topic paper TP 8.

Justified

2. The extensive evidence base covers a spectrum of factors including environment, transport and service provision (including utilities as well as social infrastructure). Page 4 of TP 8 summarises the factors shaping the spatial strategy. Document EIP 70 demonstrates the need for overall JCS housing targets, and therefore the analysis in TP8 is still valid. Section 7.1 of TP8 discusses the historic pattern of growth around Norwich, and 7.4 summarises the results of early consultation on appropriate criteria for locating new housing development.
3. Appendix 2 of TP 8 explains thinking behind the selection of the north east as a major urban extension. It highlights the conclusions of the sustainability appraisal of alternative locations within the Broadland part of the NPA and examines the merits of concentration for social infrastructure delivery.
4. Appendix 2 includes public response at the issues and options stage to different locations, and to the initial stages of preparation of an earlier Broadland core strategy (before commencing the joint process) looking at alternative strategies to accommodate development within the Broadland part of the Norwich policy area.
5. This is summarised in the conclusion in section 4 of appendix 2 of TP8.
6. The NDR is promoted as a major scheme in Norfolk County Council's 2nd Local Transport Plan (2006-2011). The JCS, must have regard to other plans and strategies and has recognised this commitment in developing a strategy that maximises the opportunities offered by the scheme.

Effective

7. TP8 includes an assessment of the potential rates at which large scale developments can realistically be delivered. The LIPP (EIP 85)

indicates the analysis of infrastructure requirements, and the capacity to provide infrastructure.

8. There are no regulatory barriers in principle to the delivery of the triangle. There are requirements to be satisfied however, principally relating to the Habitats Regulations. The issue particular to this area is the risk of increased visitor pressure on sensitive environments, particularly around the Broads, and the JCS requires this to be alleviated through the provision of appropriate and attractive green infrastructure.
9. The concept of independent, but linked, quarters referred to in Policy 10 adds to flexibility. Inevitably there is some critical infrastructure required to be co-ordinated across the growth triangle as a whole. This includes utilities, green infrastructure, the location of a district centre, a secondary school and transport infrastructure. The County Council is responsible for the latter two.
10. Flexibility around the delivery of the high school can be offered through the use of existing high schools ahead of local provision. The LIPP (EIP 85) assumes delivery of phase 1 by 2021.
11. Transport interventions can be introduced in a phased manner, for example bus rapid transit can evolve in stages from the present level of service through incremental improvements, and cycle/pedestrian routes can be provided in stages as development progresses, provided there is an overall concept towards which all parties are working.
12. Water supply issues are not particular to the growth triangle but are related to the ability to accommodate planned levels of growth irrespective of precise location. In terms of waste water disposal, the Water Cycle Study (ENV 4.1-ENV 4.5) indicates that there is capacity for some 4000 dwellings in the existing pumping main linking the western part of the growth triangle to Whitlingham sewage treatment works which itself has no capacity limitations which would prevent the planned levels of growth.
13. Green infrastructure will be provided in parallel with development, in accord with the overall guiding framework.

#### National Policy

14. The growth triangle fully accords with national planning policy statements and guidance. The Government Office has been involved throughout and has raised no concerns.

- B3 Does the amended concept statement provide sound guidance for the development? Are the content and objectives of the two maps in the concept statement effectively communicated, or does the key need to include further explanation of the 'areas of green space' and the 'constraints and opportunities for new development'?

1. Following the publication of the focused changes, the GNDP authorities decided not to proceed with the proposed strategic allocation and concept statement, and the question is no longer applicable.

### **Transport issues related to the growth triangle**

- B4 Is the Northern Distributor Road (NDR) justified and effective as the means of providing the 'necessary access to key strategic employment and growth locations' and releasing road capacity to achieve 'significant improvement to public transport, walking and cycling in Norwich', and particularly North Norwich (JCS para 5.44)?

1. The NDR is included in Norfolk County Council's 2<sup>nd</sup> Local Transport Plan (2006-2011), is fully justified through its Major Scheme Business Case and achieved Programme Entry status.
2. The NDR provides direct linkage to the strategic employment locations at the airport, Rackheath and Broadland Business Park. The Postwick Hub proposals include an enhancement to the existing trunk road junction that currently serves Broadland Business Park. Without this the remainder of the existing allocation at Broadland Business Park cannot be developed, or the proposed expansion in the JCS brought forward. The Postwick Hub releases land at Broadland Business Park and unlocks about 1600 houses (see also the response to matter B8.) The NDR builds on the Postwick Hub improvements and provides a strategic road link to the airport and surrounding employment areas from the national trunk road network.
3. The NDR in itself is not the primary means of providing access to the Growth Triangle. The Growth Triangle will build on the existing transport linkages to the city centre and local services and employment areas. However, there are existing problems of congestion, delay and vehicles using unsuitable routes that will be resolved by the NDR (see Figure 1 of EIP 88).
4. The scale of growth in the North east will require local improvements to public transport. Appendix D of EIP 88 shows the enhancements to support growth in the North East. To deliver these bus priority and reliability measures need to be introduced. These rely on the capacity released by the NDR.

5. These issues are discussed in more detail in the response to Matter 5.

B5 The NATS implementation diagram at p61 provides a proposed pattern of public transport interchanges, bus rapid transit corridors, core bus routes, park and ride sites, and key cycle corridors. In relation to the growth triangle: (1) What degree of public transport use/modal shift is aimed for? (2) What is the programme for completing the constituent elements of NATS? (3) Is there reasonable prospect of these being implemented within a timescale in step with new development, or would the NDR tend, instead, to generate more car dependency? (4) Is the relative remoteness of the ecotown from current transport infrastructure likely to militate against high public transport useage? (5) Would an effective JCS set minimum threshold levels of public transport accessibility, allied to the progress of development?

1. The interventions necessary to set monitor and manage transport indicators are at a level of detail not appropriate to the JCS. While the JCS does not itself set targets for modal shift, it is predicated on public transport based development. EIP 88 shows that the scale and distribution of the major growth locations, including the Growth Triangle, can support viable and deliverable high quality public transport. The JCS as a high level strategy has identified locations that provide the opportunity and potential to be served by public transport but the delivery mechanism will be through the NATS Implementation Plan (EIP9 and 10). Norfolk County Council is responsible for NATS and is a partner in the preparation of the JCS. The NATS Implementation Plan has been developed alongside the JCS. The Implementation Plan and monitoring plan is being further developed alongside LTP3. LTP3 / NATS will determine appropriate targets to monitor and manage implementation to achieve JCS objectives.
2. The NATS Implementation Plan is the programme. NATS has a strong track record of delivering public transport interventions. Section 4 of EIP 88 sets out what has been delivered recently. A number of the schemes have already directly contributed to enhancing the proposed BRT routes such as the extension of the bus lane on A11 Newmarket Road and improved passenger information on Dereham Road. Looking forward, further work is programmed on Dereham Road and through the Rackheath Low Carbon Community Programme of Delivery the initial phases of sustainable transport links to the Growth Triangle. Appendix D of EIP 88 identifies how transport interventions relate to the scale and phasing of growth and the promotion of public transport. The public transport service improvements can be supported by development contributions in the early years before becoming commercially viable. This is demonstrated by experience of other large sites across Norwich. As indicated in response to 1 above there are no

rigid timescales as implementation will depend on the rate of growth and responses from the public transport operators. Funding for interventions will come from a variety of sources, including mainstream public funding and developer contributions. At this time there are not detailed funding plans, but the existing mechanisms for promoting schemes would be used to deliver elements of the strategy as appropriate. Given that public transport interventions can be phased, schemes can be developed and tailored to meet the needs as funding becomes available.

3. Public transport interventions will be delivered in step with development. EIP 88 demonstrates how this will be achieved. There are good recent examples of bus operators serving new large development sites in Norwich commercially from the outset without developer contributions. An example is Queens Hills, Costessey where two bus operators have served the site from first occupation, taking advantage of the established public transport corridor. The NDR does not provide a direct route for local and city centre trips that would arise from the Growth Triangle and is not providing capacity for car trips to compete against the planned public transport enhancements. Provision of the NDR gives the scope for specific interventions to assist public transport delivery. Without these interventions public transport service enhancements will be diluted by the impacts of local congestion that will make services less reliable and slower. This has a twofold effect.
  - i. Public perception and uptake of the bus services declines and;
  - ii. It becomes more costly for operators to continue to deliver the required level of service as slower more unreliable journey times will require the introduction of further vehicles which in turn reduces commercial viability.
4. The effectiveness of public transport and the NDR will need to be reinforced through appropriate planning layout and design of the new communities, as required by Policy 2, but the detail is outside the scope of the JCS.
5. The Rackheath development is only one element of the Growth Triangle and will not be a stand alone element in the overall strategy. The trajectories merely assume an early start because of government support. The Growth Triangle will be served by a BRT corridor which will continue to be enhanced alongside development. Early design work is underway. Public transport, walking and cycling interventions to support the earlier timescale for Rackheath are set out in the draft LIPP (EIP85), and form the start of a longer term investment in public transport interventions to support the Growth Triangle in its entirety.
6. EIP 88 sets out public transport thresholds allied to major growth locations generally in Table 2 and specifically for the Growth

Triangle in Appendix D. The Growth Triangle is served by existing public transport as set out in 5.5.2 of EIP 88, which will be further enhanced as part of these proposals. Options exist for travel by bus and train and linkages to cycle networks will be improved to achieve modal shift. Policy 2 of the JCS requires that future planning and layout of specific development proposals take advantage of the opportunities to develop high quality public transport, walking and cycling networks from the outset. Norfolk County Council will work with those producing more detailed planning documents to make sure the key features to support walking, cycling and public transport are embedded in designs.

- B6 In view of the importance seemingly ascribed to the proposed eco-town's proximity to rail services at the time of its selection as such, is there any demonstrably realistic prospect of significant improvement to the low level of service and the limited number of destinations currently available on the Norwich-Cromer line, or its transformation into some other form of more attractive public transport facility?

1. The concept of tram train derives from the promoters of the low carbon development at Rackheath, but it is dependent on overcoming operational barriers to the use of light rail rolling stock on heavy rail infrastructure. At this time public transport enhancements are focussed on BRT as this will better serve the NE as a whole. The Rackheath site does have the opportunity for rail and the part rail plays in future public transport delivery will be kept under review through NATS.

### **Implementation issues associated with the triangle**

- B7 If the NDR is fundamental to the delivery of the JCS [para 5.44], are the resources likely to be in place to achieve it, and when? [The answer to this question may or may not become clearer after the October budget after which, if it is budgeted, an inquiry into the Postwick Hub will be required.] What would be the consequences of a possibly unknown length of delay in provision of the NDR? Does the JCS have flexibility in this respect, bearing in mind that JCS policy 10 states that 'Delivery (of the growth triangle) is dependent on the implementation of the Northern Distributor Road (NDR)'.

1. The Council Council's Cabinet approved the NATS Implementation Plan at its 6 April 2010 meeting (EIP 9 and EIP 10). The NDR and Postwick Hub position was updated within this paper and the Cabinet confirmed its commitment to the NDR as a priority of the County Council. In particular it agreed to underwrite the increased funding shortfall (from £27.5m to £39.7m), brought about by Department for Transport's decision not to fund the NDR beyond the

A140 junction, and agreed to continue with the NDR planning application to the A1067, as originally planned.

2. This highlights the County Council's continuing determination to ensure the delivery of the NDR, as it recognises the central importance of this key infrastructure in order to be able to continue the successes so far achieved through NATS, and to enable the continuing roll out of the initiatives set out in the approved Implementation Plan
3. The County Council, along with its GNDP partners are continuing to work on projects that form part of the NATS Implementation Plan, such as the major St Augustine's gyratory improvement, A11 corridor bus lane improvements, BRT development on Dereham Road and towards the Eco-Community as part of its Programme of Development.
4. Given this level of commitment to improve transportation in Norwich, it is clear that whilst some delay to the NDR would not be desirable, it would not diminish the determination to see it delivered as part of the wider NATS Implementation Plan. Even if Government funding for the NDR is delayed, every possible funding opportunity, such as CIL, TIF and the scope for local tariffs, County Council contributions and developer contributions will be explored to ensure that the critical infrastructure required for the JCS (which includes the NDR) is delivered. The Infrastructure Study and the work associated with the LIPP confirm both the priority given to the NDR but also the scope for alternative funding mechanisms to contribute towards its provision.
5. There will be a Public Inquiry (PI) into the Side Road Orders (SROs) for Postwick Hub. However, the PI will not be instructed until the spending review announcement has been made. There are no statutory objections to the SROs, however there are a number of non-statutory objections and it is this that has prompted the decision regarding the PI. The County Council is confident that it will successfully defend any SRO objections at the PI. The planning position for the junction is very strong; it has planning consent, and this includes an associated business park development. In addition, current proposals within the growth triangle for an extension to the existing Broadland Business Park and housing development (Brook Farm) are reliant on the Postwick Hub being implemented.
6. There is scope for the first 1600 homes to be delivered after the provision of the Postwick Hub. Any delay in the provision of the NDR would result in delay in the delivery of further growth in the Growth Triangle.



B8 Paragraphs 44-48 of the Concept Statement at Appendix 5 (Focussed Change FC10) confirm that there can be no commitment to large-scale development in the growth triangle but assess that some 2200 dwellings (which appear to represent existing permissions and allocations [?] – see para 47) may be acceptably developed subject to ‘interim improvements for other modes’ and ‘knowledge that the Postwick Hub improvement will be delivered and the NDR is committed’. In addition, it is suggested that a further 1000 dwellings may be built at the Eco-town, [By reference to the annualised build figures for the various growth locations this means that the eco-town could progress to the stage expected by mid 2014-15 and the rest of the growth area to the stage expected by as late as mid 2021/22.] Question - Are these ‘sound’ limits/expectations, or should growth be more or less constrained in the absence of firm commitment to/funding of a start to the NDR?

1. Section 7 of EIP 88 demonstrates the relationship between the NDR, other transport infrastructure and growth. Importantly EIP 88 shows that without the Postwick Hub only the exemplar phase of the Rackheath proposals (200 homes) and current local plan commitments can go forward. Improvements to the trunk road junction achieved through the Postwick Hub proposals will release Phase 2 of the existing allocation at Broadland Business Park, and the potential for 1600 additional homes in the Growth Triangle. If the Postwick improvement is not provided there is likely to be an objection from the Highways Agency which could prevent any further development until the trunk road issues are resolved. This is the first constraint on development.
2. The 2200 represents existing and potential new commitments. A site currently allocated for housing in the adopted local plan, and with a resolution to grant planning permission, could account for about 1200 dwellings. The neighbouring site currently under construction could yield a further 200 or so dwellings. These can clearly proceed without Postwick Hub/NDR. Taking these into account, the thresholds envisaged, which could be built without any intervention are:
  - Existing commitments - 1400
  - Rackheath exemplar - 200
3. An additional 1600 dwellings are dependent on the new link road and Postwick hub. In the concept statement these were envisaged to be:
  - Early phases at Rackheath – 1000
  - Additional new commitment within link road – 600
4. (These figures correspond to the indicative thresholds of 2200 plus 1000 referred to in paragraphs 45 and 46 of the concept statement, and also to the 1600 released by the Postwick hub and new link road referred to in the response to question B4)

5. The indicative trajectory in Appendix 6 of the JCS suggests that the scale of growth at Rackheath and in the remainder of the triangle that can take place without the NDR, could progress into 2016/17, beyond the target opening date of the NDR of 2015/16. If the NDR can be delivered on time, there should be no interruption to delivery.
6. The trajectories assume an early start for Rackheath because of government support and developer activity, but this is not a phasing requirement of the JCS.

B9 What are the other critical infrastructure dependencies of the eco-town and the other component parts of the triangle? Are these parts divisible/indivisible in terms of these dependencies?

1. Critical infrastructure for the north east triangle is covered in the LIPP (EIP85) and revised Appendix 7 of the JCS (EIP84) (see also matter 4A).
2. The growth triangle, including Rackheath, is an integrated whole and should not be separated.
3. Apart from transport (dealt with at B8) the principal indivisible elements are overall water supply, which is critical to the strategy as a whole, trunk sewer capacity following the use of existing spare capacity, and major electricity investment. These elements are critical in terms of showstoppers. In this instance, green infrastructure is also critical in order to avoid conflict with the Habitats Regulations though phasing of its provision may be possible. In addition, the high school is indivisible in the sense that it needs a critical mass to support it in the long term, though its provision may be phased.

### Other issue

B10 If the JCS is unsound in relation to the growth triangle, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. The evidence demonstrates that the growth triangle is sound, proposed minor changes (JCS2 and EIP93) address drafting errors and provide clarity. If the inspectors consider the spatial strategy is fundamentally flawed in proposing a major urban extension in the north east, it is hard to see how the current strategy could be made sound without very major revision.



## Greater Norwich Development Partnership

### **Matter 3c Other major growth locations in policy 10**

**Note:** EIP93 sets out the minor changes to the text of JCS1 to address revocation of the Regional Spatial Strategy.

### **Wymondham (see also matter K concerning public transport in the A11 corridor)**

A Does the JCS make justified and effective growth proposals for the town?

1. Wymondham is justified as a growth location as it is a significant Market Town with a good range of jobs and services and facilities, while serving its own catchment and having good sustainable transport links to Norwich.
2. This location was supported by the results of the initial Issues and Options consultation (JCS6) and the Sustainability Appraisal (SA) of the initial 12 potential growth locations (EIP12). These led to the rejection of alternative locations and established Wymondham as part of the initial draft Preferred Option (later Option 1) for growth in the Norwich Policy Area. Subsequent sustainability tests applied to the development of further options, and the SA applied to the Regulation 25 Technical and Public consultations (EIP14), supported the continued inclusion of Wymondham as a growth location.
3. The proposed scale of growth is consistent with the results of the evidence studies. It is considered to be an appropriate balance between environmental considerations and the provision of jobs, services and facilities.
4. The scale of growth proposed is considered to be effective and deliverable due to the strong interest of a number of prospective developers.

- B What are Wymondham's critical infrastructure dependencies and can growth there take place within the timescale set out in Appendix 6 (p111) of the JCS?

1. Wymondham shares its priority one transport requirements with the other locations for growth in the A11 corridor.
2. Reinforcement of electricity infrastructure will be required late in the plan period.
3. A revised version of JCS Appendix 7 "Implementation Framework" clarifies the requirements for, and provision of, key infrastructure in response to this issue (EIP 84) as expanded by the LIPP (EIP 85).
4. Wymondham is dependent on Thickethorne junction improvements which are subject to an ongoing study in conjunction with the Highways Agency and local developer interests.
5. Public transport service and infrastructure enhancements leading towards BRT on the corridor have already been delivered and further incremental improvements can be delivered early in the plan period.
6. The GNDP is confident that growth can take place within the required timescale due to the expression of significant developer interest. The trajectories do not envisage significant growth starting in Wymondham before 2014/15.

- C If the JCS is unsound in relation to Wymondham, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. The GNDP considers that the proposals for Wymondham are sound.

**Hethersett (see also matter K concerning public transport in the A11 corridor)**

- D Does the JCS make justified and effective growth proposals for Hethersett? Is it allocated more growth than suggested by its position as a 'key service centre' in the identified hierarchy of centres (see policies 14 and 19)?

1. The identification of Hethersett for major growth is justified by its location. It is a significant settlement with a wide range of services

and facilities and has good sustainable access to Norwich and strategic employment locations, including Norwich Research Park, Norfolk and Norwich University Hospital and Wymondham. It is also well located for Hethel and Longwater employment locations. Its location in the A11 corridor will also enable the provision of enhanced public transport services and the provision of Bus Rapid Transit.

2. This location was supported by the results of the initial Issues and Options consultation (JCS6) and the SA of the initial 12 potential growth locations (EIP12). These led to the rejection of alternative locations and established Hethersett as part of the initial draft Preferred Option (later Option 1) for growth in the Norwich Policy Area. Subsequent sustainability tests applied to the development of further growth strategy options and the SA applied to the Regulation 25 Technical and Public consultation growth options (EIP14) supported the continued inclusion of Hethersett as a growth location.
3. The proposed scale of growth is consistent with the results of the background evidence studies. It is considered to be an appropriate balance between environmental considerations and the provision of jobs, services and facilities. It contributes towards the provision of a variety of scales of major growth locations within the NPA to enable the delivery of the overall housing requirement.
4. The proposals are considered to be effective and deliverable due to significant developer interest.
5. Hethersett ranks relatively low in Policy 19: Hierarchy of Centres because the development of its commercial facilities has been subdued by the impact of the settlement's close proximity, and easy access to, the superior choice of shops and services in Norwich. Population growth will encourage enhanced local facilities.

E What are the critical infrastructure dependencies for this location and can delivery of growth take place within the timescale set out in Appendix 6 (p111) of the JCS?

1. Hethersett shares its priority one transport requirements with the other locations for growth in the A11 corridor.
2. The solution to wastewater transmission infrastructure is expected to be shared with Cringleford and Easton/Costessey.
3. A revised version of JCS Appendix 7 Implementation Framework (EIP84) clarifies the requirements for, and provision of, key

infrastructure in response to this issue (EIP84) as expanded by the LIPP (EIP 85).

4. Hethersett is dependent on Thickthorn junction improvements which are subject to an ongoing study in conjunction with the Highways Agency and local developer interests.
5. Public transport service and infrastructure enhancements leading towards BRT on the corridor have already been delivered and further incremental improvements can be delivered early in the plan period.
6. The GNDP is confident that growth can take place within the required timescale due to the expression of significant developer interest. The trajectories do not envisage significant growth starting in Hethersett before 2014/15. A later start would not compromise delivery in the plan period.

- F If the JCS is unsound in relation to Hethersett, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. The GNDP considers that the proposals for Hethersett are sound.

**Cringleford (see also matter K concerning public transport in the A11 corridor)**

- G Does the JCS make justified and effective growth proposals for Cringleford?

1. Cringleford is justified as a growth location as it is in the Norwich fringe with good access to a wide range of services and facilities (including the adjacent Eaton District Centre), Norwich and other strategic employment locations. These include the Norwich Research Park and the Norfolk and Norwich University Hospital, which are both close by. Cringleford's sustainable location in the A11 corridor also has good potential for the enhancement of public transport and the provision of Bus Rapid Transit.
2. The proposed scale of growth is consistent with the results of the background evidence studies. It is considered to be an appropriate balance between environmental considerations and the provision of jobs, services and facilities. It contributes towards the provision of a variety of scales of major growth locations within the NPA to enable the delivery of the overall housing requirement.

3. The proposals are considered to be effective and deliverable due to significant developer interest.

H What are the critical infrastructure dependencies for this location and can the growth take place within the timescale set out in Appendix 6 (p111) of the JCS?

1. Cringleford shares its priority one transport requirements with the other locations for growth in the A11 corridor.
2. The solution to wastewater transmission infrastructure is expected to be shared with Hethersett and Easton/Costessey.
3. A revised version of JCS Appendix 7 Implementation Framework (EIP84) clarifies the requirements for, and provision of, key infrastructure in response to this issue (EIP 84) as expanded by the LIPP (EIP84).
4. Cringleford is dependent on Thickthorn junction improvements which are subject to an ongoing study in conjunction with the Highways Agency and local developer interests.
5. Public transport service and infrastructure enhancements leading towards BRT on the corridor have already been delivered and further incremental improvements can be delivered early in the plan period.
6. The GNDP is confident that growth can take place within the required timescale due to the expression of significant developer interest. The trajectories do not envisage significant growth starting in Cringleford before 2015/16. A later start would not compromise delivery in the plan period.

J If the JCS is unsound in relation to Cringleford, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. The GNDP considers the proposals for Cringleford are sound.

### **Public transport in the A11 corridor**

Comments: The NATS implementation plan at p61 of the JCS indicates a proposed bus rapid transit corridor running through Norwich-Cringleford-Hethersett-Wymondham. However, the summary findings of the Sustainability Appraisal state that the strategy for major expansion of a number of existing



communities in South Norfolk places *'increased difficulty of achieving a degree of self-containment and providing attractive public transport options that encourage people to use their cars less'*. It observes that growth in the A11 corridor is focussed on areas *'where there should be potential to connect to Norwich via a bus rapid transit service, although it is difficult to be completely certain about deliverability/financial viability at this stage'*. Para 2.257 of the SA states that none of the growth areas under the South Norfolk distribution are of sufficient size to support a turn-up-and-go bus service in 2021, and para 2.2.59 says that the proposal for 4,400 dwellings on the corridor is *'at the borderline'* of providing a potential market sufficient in size to support the development of bus rapid transit.

K In the light of the comments above, can these growth locations effectively support objective 7 on p27 of the JCS (enhancing transport provision to meet the needs of existing and future populations while reducing travel need and impact)? Is there a clear and convincing strategy to ensure that adequate bus provision will be made in line with housing growth at a stage sufficiently early to influence travel patterns? What are the expected timetables and funding sources for achieving the NATS public transport proposals for the corridor and are these likely to be delivered?

1. Paragraphs 5.3 to 5.3.7 of EIP 88 set out the issues relating to public transport. They show that taken together, the growth locations along the A11 corridor provide for a sufficient market to support high quality public transport services. The overall number of households served, taking in to account existing population, and proposed growth would comfortably provide a sufficient market to support Bus Rapid Transit.
2. Appendix B of EIP 88 shows how services and interventions will be phased in relation to the overall scale of growth on this corridor.
3. The report to Norfolk County Council Cabinet 6 April 2010 (EIP9) sets out a high level NATS Implementation Plan the County Council remains committed its delivery. Funding of interventions will be from a wide variety of sources. The public transport proposals can be phased in. There is extensive public transport infrastructure already in place on the corridor, with the most recent enhancement, the extension of the Newmarket Road bus lane being completed in May 2010.

### Long Stratton

L Does the JCS make justified and effective growth proposals for Long Stratton bearing in mind its poor assessed performance in sustainability appraisals undertaken since 2007?

1. The location is justified as Long Stratton has a self-contained housing market (see document ref: H2) and the best range of local shops, services and job opportunities of the strategy area's Key Service Centres, not far below the level of a main town. It serves a rural catchment and has good bus links to Norwich, especially when measured in a local context. It also has regular bus links serving other parts of its catchment and other main settlements.
2. Long Stratton has suffered from the long standing adverse air quality and other environmental impacts of road traffic on the A140. There is a need to improve air quality by the removal of through traffic, as identified by the South Norfolk Sustainable Community Strategy (JCS 17.3). The provision of a bypass, funded by new development, is the only means of achieving this. The level of development proposed is considered to be justified in response to this issue.
3. The iterations of the SAs have acknowledged that Long Stratton is less accessible to Norwich than other major growth locations. Evidence demonstrates that this difference is relatively marginal. The SAs have also acknowledged its good range of employment opportunities, services and facilities. The proposed growth will have no adverse impact on the sustainability of the overall strategy, and the settlement has potential to be developed as a more self-contained community (Pre-Submission JCS SA, JCS 3).
4. Documents EIP 86 and EIP 88 set out the potential transport improvements and a basis for the development of a Vision for the growth of Long Stratton as a more self-contained sustainable community. The transport and accessibility issues are also addressed in response to question (N) below.
5. The proposed scale of growth is consistent with the results of the background evidence studies. It is considered to be an appropriate balance between environmental considerations and the provision of jobs, services and facilities. It contributes towards the provision of a variety of scales of major growth locations within the NPA to enable the delivery of the overall housing requirement and to deliver a bypass.
6. The proposals are considered to be effective and deliverable due to significant developer interest.

M Is the town allocated more growth than suggested by its position as a 'key service centre' in the identified hierarchy of centres (see policies 14 and 19)?

1. Long Stratton has been allocated a high level of growth to address

long standing environmental issues arising from the A140 traffic that passes through the village, i.e. through the provision of a bypass.

2. The village has a range of services approaching those of a main town, and the SA (JCS3) has acknowledged that the village has many attributes and the potential to be developed as a more self-contained community. Long Stratton also has good public transport links to Norwich with the potential for their enhancement. See EIP 86 for more detail.
3. The settlement is a suitable location for additional major growth as one of the largest and best served settlements in South Norfolk. It is already relatively self-contained. Growth has the potential to develop Long Stratton to main town status, with enhanced services, facilities and local environmental improvements through the provision of a bypass.

Comments: The Sustainability Appraisal of the submitted JCS (like those undertaken at all previous stages of its evolution since 2007) identifies Long Stratton as being *'less suited to encouraging more sustainable patterns of travel...(as it is)...geographically isolated from Norwich and major employment locations in comparison with the other major growth locations and...there is little potential to deliver public transport improvements that will have a realistic chance of encouraging people out of their cars'*. It concludes that this is *'undoubtedly a significant negative effect of the strategy and probably the major issue that has been highlighted through this SA'*. Despite this the SA states that the scale of the growth at Long Stratton (as a proportion of the JCS total) is not such as to *'place in question the overall sustainability of the JCS in terms of achieving sustainable travel'*. After discussing the proposed growth as the only means of securing a bypass and its associated benefits, the SA finds it *'more difficult to say whether the local level benefits associated with growth at Long Stratton outweigh the more strategic disbenefits'*. It concludes that *'irrespective of the answer to that question there must be focused efforts to mitigate negative effects and recommends that there is justification for going further, perhaps by developing a bespoke vision for achieving an ambitious degree of self-containment within Long Stratton'*.

- N In the light of the above comments, is the retention of the growth/ bypass proposal sound? Is there convincing evidence to conclude that the required culture change from car-borne transport to more sustainable modes could be achieved? How would this be done? [The JCS is silent on this point.]

1. Growth in Long Stratton is not solely about meeting the highest public transport standards. Long Stratton has a good range of local

services and employment, easy to access by walking and cycling. Development builds on Long Stratton's self containment and supports local services.

2. It has a good public transport service given the scale and location of the settlement. Major planned growth in Long Stratton will enhance existing provision to a 15 minute bus service throughout the day which is a very good public transport service. Paragraphs 5.6 to 5.6.7 of EIP 88 explain in more detail the existing public transport provision, how this will be enhanced in response to growth and the physical interventions needed to support a reliable service. There is scope for bus priority measures to be introduced along this corridor to improve the reliability of bus services. Other measures will also be introduced including improved travel information, bus stop infrastructure, improved ticketing arrangements and improved walking and cycle links. Long Stratton can provide at least a 15 minute frequency of service compared to a 10 minute frequency for other growth locations.
3. A bypass provided in conjunction with development provides strategic access enhancements and local environmental benefits. A bypass is necessary if the scale of growth proposed is to be accommodated in the settlement without further eroding the strategic function of the important A140 route from Norwich south to the A14.
4. Policy 2 requires that development is designed around sustainable modes and public transport. Masterplanning required by Policy 10 will fully embrace this concept such that sustainable modes are a genuine choice.

- O What are the critical infrastructure dependencies for this location and can its delivery take place within the timescale set out in Appendix 6 (p111) of the JCS?

1. The critical infrastructure dependencies for Long Stratton are the bypass and resolution of capacity limitations at the wastewater treatment works.
2. A revised version of JCS Appendix 7 Implementation Framework (EIP84) clarifies the requirements for, and provision of, key infrastructure in response to this issue as expanded by the LIPP (EIP85).
3. The GNDP is confident that growth can take place within the required timescale due to the expression of significant developer interest. The trajectories demonstrate that a start as late as 2017/18 in Long Stratton could provide for the scale of growth proposed but

there is no barrier to an earlier start subject to infrastructure provision.

- P If the JCS is unsound in relation to Long Stratton, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. The GNDP considers the proposals for Long Stratton are sound.
2. Proposed minor changes (JCS2 and EIP93) address drafting errors and provide clarity.

### **Easton/Costessey**

- Q Does the JCS make justified and effective growth proposals for this location? Can growth here take place in the form of an appropriate urban extension keyed into effective public transport connections?

1. Costessey is a Norwich fringe parish forming part of the Norwich urban area with good access to a wide range of services, facilities, strategic level employment opportunities and major retail provision at Longwater. The adjacent settlement of Easton also benefits from these facilities while having significant local employment opportunities at Easton College. Both places have good public transport opportunities and access to the Norwich Research Park, Norfolk and Norwich University Hospital, the UEA and employment opportunities at Bowthorpe.
  - This location was supported by the results of the initial Issues and Options consultation (JCS3) and the SA of the initial 12 potential growth locations (EIP12). These led to the rejection of alternative locations and established a growth location to the west of Norwich as part of the initial draft Preferred Option (later Option 1) for growth in the Norwich Policy Area. Subsequent sustainability tests applied to the development of further growth strategy options and the SAs applied to the Regulation 25 technical and public consultation growth options (EIP14) supported the continued inclusion of Easton/ Costessey as a growth location.
  - The proposed scale of growth is consistent with the results of the evidence studies. It is considered to be an appropriate balance between environmental considerations and the provision of jobs, services and facilities. It contributes towards the provision of a variety of scales of major growth locations within the NPA to enable the delivery of the overall housing

requirement.

- The proposals are considered to be effective and deliverable due to significant developer interest.

2. The two settlements are adjacent and have benefited from committed public transport investment which will lead to enhanced public transport and eventually Bus Rapid Transit services.

R What are the critical infrastructure dependencies of this location and can its delivery take place within the timescale set out in Appendix 6 (p111) of the JCS?

1. The priority one infrastructure dependencies for Easton/ Costessey are the trunk road junctions, BRT, wastewater transmission infrastructure and pedestrian cycle links to Longwater employment area.

2. Public transport service and infrastructure enhancements leading towards BRT on the Dereham Road corridor have already been delivered and further incremental improvements can be delivered early in the plan period.

3. The solution to wastewater transmission infrastructure is expected to be shared with Cringleford and Hethersett.

4. A revised version of JCS Appendix 7 Implementation Framework (EIP84) clarifies the requirements for, and provision of, key infrastructure in response to this issue as expanded by the LIPP (EIP 85).

5. The GNDP is confident that growth can take place within the required timescale due to the expression of significant developer interest. The trajectories do not envisage significant growth starting in Easton/Costessey before 2014/15. A later start would not compromise delivery in the plan period.

S If the JCS is unsound in relation to Easton/Costessey, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. The GNDP considers the proposals for Easton/ Costessey are sound.

## Greater Norwich Development Partnership

### **Matter 4 Infrastructure delivery (the JCS generally and policy 20 & Appendices 7 & 8 in particular)**

- A Is the JCS effective in what it conveys about the infrastructure necessary for its successful implementation and when and by which agencies it will be delivered? Does the Implementation Framework at Appendix 7 adequately identify the fundamentally essential infrastructure items without which its major component elements (eg the major growth locations) cannot progress? Are all 80 items in Appendix 7 equally 'critical', or would some be more appropriately styled 'desirable' or 'aspirational'? If so, which?

1. These issues are dealt with in EIP84 including the revised Infrastructure Framework (Appendix 7). This provides the level of guidance appropriate to a core strategy.
2. Critical infrastructure has been categorised into three levels of priority and phased over three periods for delivery.
3. The infrastructure requirements specified in the JCS, and prioritised in revised Appendix 7, are derived from the available evidence, updated through ongoing engagement with providers.

- B Do any infrastructure items represent 'showstoppers' which, if not completed by a certain date, would prevent implementation of particular key aspects of the JCS? Does the JCS appropriately identify them, and the consequences of their non-delivery?

1. Insofar as it is possible and at the level of detail appropriate for a core strategy, the JCS, including the revised Appendix 7, correctly identifies "showstoppers" as Priority 1 infrastructure. It provides a critical path and outlines the consequences of non-delivery. More detailed information is included in the LIPP (EIP85). "Showstoppers" that relate to particular locations are discussed under Matter 3.
2. "Showstoppers" that have an impact which makes them fundamental to delivery of the overall strategy are the NDR and Thickthorn junction. Potable water supply is also a "Showstopper", but has not been included in appendix 7 because it can only be funded through

the AMP process and is covered by statutory responsibilities.

3. Without the NDR, growth to the north of Norwich is severely constrained and the required step change in public transport cannot be achieved. The JCS recognises this. Delivery of the NDR is discussed in more detail under Matter 3B.
4. Thickthorn junction affects all the growth locations along the A11 corridor and is discussed under Matter 3C.
5. Notwithstanding the extensive investment in the Water Cycle Study, the Environment Agency's Review of Consents has only recently been completed and has identified the scale and timing of issues around the potential for delay in resolving a sufficient potable water supply. Ongoing engagement with Anglian Water Services, the Environment Agency and Natural England continues to identify the preferred solution. A shared Position Statement will be available at the Examination.
6. Even "showstoppers" may not be absolute constraints and are based on available information at a point in time. For example, absence of sewerage capacity appears to be a showstopper in some locations and the WCS identifies a need for strategic interceptor sewers. However, actual capacity is subject to further modelling and there may be alternative mechanisms to overcome or moderate the constraint particularly in the short to medium term.
7. The key issue is active management. The existence of the GNDP and the adoption of the LIPP process, establishes the mechanism for managing timely provision and overcoming constraints to ensure that they do not become "showstoppers".
8. Funding for infrastructure will come from a range of sources, including mainstream funding. Another key element will be CIL/Tariff and a viability study is underway to understand how this would be implemented. Every possible funding opportunity, such as CIL/Tariff, TIF, opportunities arising from the government's match funding for council tax and other new initiatives will be explored to ensure critical infrastructure required for the JCS is delivered. We recognise the need to make the best use of funding streams to maximise value.

**C** Is there evidence of agreement by providers that there is a reasonable prospect of the required infrastructure being completed by the critical dates?

1. Position Statements from key service providers will be available for the examination.
2. Through the JCS and the LIPP there is a process on ongoing



engagement with all service providers on timely infrastructure delivery and funding.

3. The County Council is a key infrastructure provider. It is a full and active partner in the GNDP and a signatory of the JCS.

*[Understanding of the above matters A-C may be assisted by the Integrated Development Programme being drawn up by GNDP and by the critical path diagrams promised at the Exploratory Meeting to illustrate the degree of fit between the expected delivery times of the housing proposed at the various growth locations at p111 of the JCS and the reasonable prospect of phased completion of the critical infrastructure items, as agreed by providers.]*

- D Is the JCS flexible? Does it indicate any actions that may need to be triggered by contingencies, such as failure to achieve timely provision of necessary infrastructure, or unforeseen circumstances.

1. The JCS is flexible with respect to timing. The housing trajectories indicate that there is a significant existing commitment to provide for short term growth. The trajectories are indicative not prescriptive. There is scope to vary the start dates and growth rates for new growth in the smaller and medium scale proposals with no detriment to overall delivery.
2. The JCS is flexible with respect to provision. Housing targets are set as minima. When site allocations DPDs are produced, reasonable levels of additional growth could be considered in individual locations if it becomes apparent that other locations may be delayed. Additionally, a significant amount of growth is provided for in more dispersed smaller scale sites and many of these (but not all) are likely to be less constrained.
3. Some key employment locations are constrained, particularly by the need for transport investment. However, the strategic employment locations are largely based on existing employment concentrations and, because they are strategically co-located, the majority also share infrastructure constraints with housing growth locations. A degree of flexibility is provided by the over-allocation of employment land (as explained in TP2).
4. It should be recognised that the JCS is delivering significant growth in the Norwich area and infrastructure constraints exist for all realistic options. The ability of a core strategy to deal with these issues through “flexibility” is limited, and the key will be the active engagement of the GNDP as a delivery vehicle. Paragraph 7.11 of the JCS makes it clear that a critical shortfall in infrastructure delivery will trigger a review.

E Are policy 20 and p10 of the JCS clear and effective on the issue of implementation, including the role of GNDP as a delivery agency?

1. Policy 20 (including proposed Minor Change) provides the clarity appropriate for a Core Strategy. The role of the GNDP is specified in paragraph 7.2 of the JCS.
2. The GNDP partners are fully committed to developing and managing an infrastructure delivery programme through the Local Investment Plan and Programme (LIPP), which is a draft, and will remain a regularly updated working document (EIP 85).
3. The Inspectors might consider whether Policy 20 could be improved by removal of reference to specific examples of Government funding sources as these may change.

## Greater Norwich Development Partnership

### **Matter 5 'Other issues' concerning Access and Transportation (part policy 6)**

*[Most of the transport-related issues concerning the growth triangle are covered under matter 3, as are bus-related issues concerning the South Norfolk growth locations]*

**Note:** EIP93 sets out the minor changes to the text of JCS1 to address revocation of the Regional Spatial Strategy.

- A Is the JCS policy for access and transportation, principally the Norwich Area Transportation Strategy (NATS) justified, effective and consistent with national policy as reflected in objective 7 of the JCS (i.e. enhancing transport provision to meet the needs of existing and future populations, while reducing travel need and impact)?

1. The implementation plan of the NATS strategy (EIP9 and 10) supports growth as set out in the JCS. As a strategy NATS has been developed over many years and the recent history is set out in the TP9. The most recent work has focussed on developing an implementation plan, and work on the implementation plan has been developed alongside the JCS. Key elements of NATS, such as the potential BRT routes, reflect the scale and distribution of growth
2. EIP88 explains that the planned public transport enhancements are viable and deliverable for all major growth locations, but this cannot be implemented fully without highway improvements such as the NDR or the improvement to Thickthorn interchange. The interrelationships between NDR and other transport infrastructure provide a balanced range of infrastructure to support growth.
3. The NDR will reduce through trips in the city and provide an opportunity to introduce public transport infrastructure. Table 3 of EIP88 gives an analysis of the effectiveness of the NDR in reducing cross city centre trips. Analysis shows that in the base year 2006, some 12,500 trips per day, or 15% of the total traffic, passed through the city centre rather than starting or stopping there. By 2016 and 2031, with the Norwich Area Transport Scheme Implementation Plan (NATSIP) this figure reduces to 4,500 and 3,500 respectively or 5% and 3%. This analysis includes JCS growth extrapolated forward to 2031. Without the NATSIP in place journey times to the Airport from Thickthorn are predicted to deteriorate in future years compared to the base year. However, with the NATSIP in place, by using the

NDR, they improve to better than the base year. In future years, peak periods journey times are 35% better due to the NATSIP and NDR.

4. By freeing up capacity on radial routes and the city centre, the NDR and complementary transport schemes enable priority measures to be introduced for buses, walking and cycling. Whilst it is considered that traffic signal priority can be delivered along all transport corridors, some corridors will only benefit from the full potential of bus priority through key junctions, once levels of general traffic are reduced following the opening of the NDR. Bus priority has the ability to operate at differing levels of impact – at junctions already operating at or close to capacity; benefits to buses are more limited. Where capacity can be released through reduced traffic flows, benefits to buses can be increased. Full benefits from road space reallocation will only be realised on some corridors once the NDR is open. Resulting reductions in traffic flows create the opportunities for traffic lanes and approaches to junctions to be dedicated to buses without unacceptable impacts. Corridors where the NDR releases most opportunities are those serving Rackheath, Postwick, Airport and Drayton.
5. Proposals to change city centre traffic circulation and restrict access for general traffic on some roads are, to a significant extent, dependent on the capacity created by the NDR. Whilst initial assessments indicate that some works could be completed in advance of the NDR, other significant proposals, such as the closure of St Stephens Street and Prince of Wales Road to general traffic and two-way operation on Rose Lane will be dependent on delivery of the NDR and the alternative route options the NDR provides. City centre proposals provide significant opportunities to provide much-needed additional capacity for bus stops, which will be needed to cater for new bus services generated to serve growth areas such as the growth triangle. This will aid bus service reliability as congestion around bus stops will be reduced, which will improve the bus service offering.
6. As well as reducing traffic flows and providing the opportunity for more pedestrian crossings, proposals for the city centre made possible by the NDR will also enable increased levels of priority to be given to pedestrians at signalised junctions. Nearly 50% of people who responded to the NATS consultation in 2009 stated that reduced traffic flows in the city centre would encourage them to walk more. In addition, over 20% said that more pedestrian crossings would have the same effect.
7. Reduced traffic flows in the city centre and along some key routes will also create the conditions for increased cycle use. Reduced traffic flows through busy junctions, such as in the city centre and on the ring roads, will enable increased levels of priority to be given to

cycle crossings. A key part of the NATSIP is to develop a core network of cycle routes along less-trafficked roads linking strategic employment locations and the city centre with existing and future housing location.

**B** The NDR aside, what evidence is available to give confidence about the planned completion dates of the other 'strategic improvements' and 'supported improvements' said to be necessary to deliver growth and facilitate modal shift [paras 5.46 & 47]

1. An adopted strategy and a proven track record of implementation give confidence that the required improvements will be delivered.
2. The report to Norfolk County Council Cabinet 6 April 2010 (EIP9 & 10) sets out a high level implementation plan for the whole of NATS and the County Council remains committed to the implementation plan. Funding of interventions will be from a wide variety of sources. Public transport interventions are able to be phased to take account of funding as it becomes available, and to meet the scale and pattern of development.
3. In the first two years of the current Local Transport Plan (LTP), a total of 112 highway improvement schemes have been completed in the NATS area including:
  - 14 cycle schemes
  - 22 traffic management / calming schemes
  - 18 local safety schemes
  - 10 bus infrastructure schemes
  - 10 local road schemes
  - 13 safer & healthier journeys to school schemes
  - 7 walking schemes
  - 6 public transport improvements
  - 9 road crossings
  - 2 bus priority schemes
  - 1 Park & Ride improvement scheme
4. Recent NATS projects include the starting of works on the St Augustine's Gyrotory, which will improve air quality, traffic circulation and bus reliability in this area and support the regeneration of the Anglia Square area. Work has also been completed on extending the existing bus lane on Newmarket Road. New state-of-the-art electronic passenger information screens have been installed along Newmarket Road and have been well received by bus users. These feature some of the first solar powered displays installed in the UK.

5. Strategic projects currently underway include Dereham Road bus improvements, design work for bus improvement measures on the Salhouse Road corridor and the Thickthorn developer forum which is looking at detailed proposals for that junction.
6. Work is progressing to develop the monitoring framework for NATS which will be essential in monitoring and managing delivery of NATS. NATS proposals are incorporated in the LIPP, to ensure co-ordination and timely delivery.

C If the JCS is unsound in relation to aspects of access and transportation, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. Proposed minor changes (JCS2 and EIP93) address drafting errors and provide clarity.

# Greater Norwich Development Partnership

## **Matter 6**    **Norwich City Centre (policy 11) and the Remainder of the Norwich Urban Area Parishes (policy 12)**

**Note:** EIP93 sets out the minor changes to the text of JCS1 to address revocation of the Regional Spatial Strategy.

A    Does the JCS provide sound core strategic guidance for the future planning of the City Centre?

1. Policy 11 of the JCS and its accompanying Key Diagram provide a sound, evidence based strategy for the planning of the City Centre to 2026. The strategy aims to makes the best of the distinctive assets of the city centre, most particularly its world class heritage assets. It implements national planning policy by promoting retail, leisure, office housing and educational development to promote regeneration and ensure the city centre retains its status at the top of the sub regional hierarchy.
2. The City Centre Topic Paper (TP1) provides detail on the strategy. It identifies:
  - recent planning approaches for the city centre
  - the national and regional policy and the local strategic context for the policy; (although the regional planning policy for Norwich is no longer extant, the priorities it set reflect national policy and are still relevant to Norwich)
  - the evidence base for the policy
  - why the chosen city centre strategy proposed in the Joint Core Strategy was identified as the best approach
  - The main areas of change and justifies the strategy for those areas
3. This strategic approach has received general support in consultation.

- B** Does it provide adequate indication of/explanation for the proposed change to the Proposals Map concerning Brazengate Shopping Area and Riverside Shopping Area?

1. This issue is dealt with in EIP79.

- C** Does the JCS policy 12 provide sound core strategic guidance for the future planning of the remainder of the Norwich Urban Area Parishes?

1. Policy 12 provides a positive strategic framework for development in the suburban areas of the Norwich urban area. The policy coordinates activity across all three districts.
2. It aims to implement national policy, particularly that in PPS1, PPS4 and PPG13 by, amongst other things, promoting regeneration, high density development in accessible locations, green infrastructure and employment development.
3. It is considered that it provides the level of detail which can reasonably be expected in a core strategy.
4. There are very few representations challenging this policy, and some of those relate to wider issues for example the growth triangle, or more detailed matters of wording.

- D** If the JCS is unsound in relation to either of these matters, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. The GNDP does not consider that there are any amendments required to the policies to make them sound, other than those relating to the Proposals Map in matter 6B, dealt with in EIP79. Proposed minor changes (JCS 2 and EIP93) address drafting errors and provide clarity.



# Greater Norwich Development Partnership

## Matter 7 Main towns, except Wymondham (policy 13)

**Note:** EIP93 sets out the minor changes to the text of JCS1 to address revocation of the Regional Spatial Strategy.

### Aylsham, Diss and Harleston

A Does the JCS provide sound core strategic guidance for the future planning of these towns? Would the proposed levels of growth meet the demographic needs of the individual towns and maintain their comparative competitive positions in relation to nearby towns?

1. The scale of growth proposed is explained in the topic paper on the Settlement Hierarchy (TP7, section 5 commencing on page 20)
2. In relation to Aylsham, the remaining uncertainty concerns the ability to accommodate further wastewater discharges within the terms of the water framework directive. This is acknowledged in the JCS and cannot be resolved without more detailed specific proposals to deal with discharges from particular development proposals
3. Paragraphs 9.12 to 9.30 of EC4 summarise the role of Aylsham town centre for the surrounding area. Generally the picture painted is of a vibrant and successful centre, but one where it is important “that Aylsham continues to enhance its retail and service offer, particularly through encouraging local independent traders and promoting the centre’s markets and its historic environment” (paragraph 9.30)
4. Paragraph 10.2–10.26 summarises the position in Diss. It describes the town as having an attractive vital and viable town centre, with good retailer representation and a vibrant local economy, but highlighting the need to focus on maintaining and improving the comparison offer, and commenting on the mismatch between the supply and demand for space in the centre.
5. Harleston is considered at paragraphs 10.51 – 10.71, with references to the importance of service businesses and the high proportion of small units, and the importance of maintaining and enhancing the comparison retail offer.

6. Section 5 of EC3 summarises the position of the Market Towns, generally painting a picture of locations unlikely to attract large scale employers but where there is potential for a more healthy sustainable economy to help serve the needs of the surrounding areas with the potential growth sectors listed in 5.7. The overall summary at 5.9 does, however, suggest there is potential for such towns to increase their sustainability through a modest share of growth.
7. It can be seen therefore that all are important rural centres offering a range of retail, employment and service functions to the surrounding area which need to be maintained and supported.
8. Policy 13 of the JCS explicitly addresses the above conclusions.
9. The evidence base for H2 (page 3) identifies local submarkets including sub areas based on Diss, Harleston, and Aylsham.
10. The “demographic needs of the individual towns” is taken to mean the numbers of new homes that would be required by 2026 to provide for a declining dwelling occupancy rate alone, when applied to the total populations of these towns in 2008, the base date of the strategy. The following figures are an approximate evaluation of this requirement, based on the only accurate recent dwelling occupancy rates available which are from 1991 and 2001 census information, as supplemented by the latest Norfolk County Council estimates, which are for April 2008.
11. Occupancy rate are not available below the district level. The occupancy rates assumed for Aylsham are based on those for Broadland district, while the assumptions for Diss and Harleston are based on those for South Norfolk district. It is considered that the application of strategy area total average figures could distort the impact of changes on such rural towns.
12. The result of the application of assumed changes in dwelling occupancy on the dwellings required in the main towns between 2008 and 2026 is shown in Table 1. This is based on the impact of a straight line projection from 2008 of the average annual decline in occupancy rates between 1991 and 2008. However this probably represents a worst case new homes requirement assumption to 2026, because the rate of annual occupancy rate decline is likely to be tailing off by then. (The background to these assumptions is shown in Appendix 1).

**Table 1**  
**New dwellings required for assumed occupancy rate for 2008-2026**  
(NB: this assumes worst case occupancy rates at 2026 and thus maximum dwelling requirements in Column 5).

	1	2	3		4		5
	JCS housing provision 2008-2026 (dwellings)	Total pop. est 2008 **	Assumed dwelling occupancy rates (ppd)		Notional resultant total dwellings required (col 2 ÷ col 3)		Assumed dwellings required 2008-2026
			2008	2026	2008	2026	
Aylsham	300	5860	2.29	2.13	2559	2751	+192
Diss/Roydon*	320	9830	2.25	2.11	4369	4659	+290
Diss*	300	7350	2.25	2.11	3267	3483	+216
Harleston	200-300	4150	2.25	2.11	1844	1967	+123

Notes: \*The Diss JCS housing provision of 300 dwellings applies to a town that overlaps the adjacent Roydon parish. However as the available total population estimates relate to separate parishes, a range of assumed maximum dwelling requirements is shown here based on the JCS provisions for Diss/Roydon and Diss alone. However the column 5 figures overall are only very broadly indicative.

\*\* Population estimates from Norfolk County Council

13. The impact of falling dwelling occupancy rates on JCS housing provisions should also be seen in the context of house building rates prior to 2008, and the outstanding housing land commitments at April 2008 (the base date of the strategy). This would also indicate the JCS provisions' ability to continue to provide for growth to maintain the recent comparative competitive positions of these towns.

**Table 2**  
**A comparison of house building rates 2001- 2008 with potential house building rates for 2008 - 2026**

	1	2	3	4	5	6
	House completions 2001-2008					
	Total	Average pa	Outstanding total housing commitment 1/4/08 (dwellings).	JCS housing provision	Total columns 3 + 4	Potential average building rate 2008 to 2026 (dwg.pa)
Aylsham	211	30	265	300	565	31
Diss	250	36	237	300	537	30
Harleston	115	16	329	200-300	529-629	29-35

14. The derivation of housing provisions for the main towns as described in TP7 was not an exact science, and while noting the above mentioned uncertainty regarding Aylsham, has been consistent with the evidence studies and consultation responses.

The potential house building rates to 2026 shown by Table 2 (column 6) provide for growth potential above that required to accommodate demographic needs and broadly similar or slightly higher house building rates than those experienced between 2001 and 2008. Such rates should assist the maintenance of the towns' comparative competitive positions.

15. The expansion of Diss is restrained by its location on the County boundary, environmental constraints to the south, east and north, reluctance to merge with Roydon village to the west, a constrained town centre traffic circulation system plus education provision constraints. Harleston is a smaller town with less comprehensive facilities but has a bypass and fewer constraints. At the time of the strategy's preparation, interest had also been expressed in the housing development of potential brownfield sites well located in relation to Harleston's town centre (which have since largely been developed to produce a significantly higher average building rate).
16. Overall, the above three towns are traditional market towns with good ranges of services each serving a rural catchment. They are also the only three main towns outside the NPA, they serve similar functions, form independent housing market areas and are suitable locations for modest employment and retail growth according to the evidence studies. The broadly equivalent scales of proposed housing growth are considered to form a balance that would maintain their existing functions and the need to provide for growth in the area's many smaller rural settlements to enhance their sustainability, retain their attractive local qualities of life, and to provide for additional flexibility in sustainable rural housing provision.

**Table 3 explains the dwelling occupancy rate assumptions used in table 1.**

Derivation of dwelling occupancy rate assumptions used in Table 1

	Dwelling occupancy rates (people per dwelling)					
	1991 census	2001 census	Norfolk County Council estimate 2008	Change 1991-2008		Change total pa x 18 = est total change 2008-2026
				Total	Total pa	
Broadland district	2.44	2.31	2.29	- 0.15	- 0.009	- 0.16
South Norfolk district	2.38	2.29	2.25	- 0.13	- 0.008	- 0.14

- B** If the JCS is unsound in relation to any of these matters, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. The GNDP considers that the proposals for the main towns are sound. Proposed minor changes (JCS2 and EIP93) address drafting errors and provide clarity.

# Greater Norwich Development Partnership

## Matter 8 Sustainability, environment and design (subject matter of JCS policies 1, 2 and 3)

**Note:** EIP93 sets out the minor changes to the text of JCS1 to address revocation of the Regional Spatial Strategy.

### Policy 1:

A Is this justified, effective and consistent with national policy?

1. The policy is justified as it is:
  - founded on a robust and credible local evidence base covering green infrastructure (GI) (ENV2 and 6) , flood risk (ENV7), water (ENV4.1 - 4.4), energy (ENV5) and Appropriate Assessment (AA) (ENV1).
  - the most appropriate strategy. It takes account of the evidence base to ensure development will minimise flood risk, make good use of sustainable energy opportunities and be resource efficient and adaptable to environmental change, making the best use of existing and future potential for GI.
2. It is effective. It reflects the objectives of the plan, particularly concerning climate change and environmental enhancement and will be implemented through other DPDs and the development management process.
3. It is consistent with national policies, chiefly those set out in PPS1, PPS5, PPS9, PPS25, PPG13

B Is the concept of green infrastructure adequately explained and integrated into the JCS? Does policy 1 provide an effective, sharply-focussed strategic brief on the purpose and deliverability of green infrastructure? Does it adequately specify the need for identified future DPDs to define the specific boundaries of strategic green corridors and include policies for the management of green infrastructure?

1. The JCS provides the strategic framework that will ensure the delivery of GI, together with more detailed policies in Site Allocation documents and Development Management Policies. GI is not only

provided through the development process. As a spatial plan the JCS will enable coordination of GI provided by developers with that provided through other means (e.g. local schemes and farming grants).

2. The JCS provides the framework, supported by the evidence in the Green Infrastructure Delivery Plan (ENV2), and implemented through the LIPP (EIP85). These constitute a sound delivery plan to inform subsequent documents and workstreams.
3. The policy supports international and national policies to protect habitats and species by providing alternative locations for leisure activities to European protected sites and creating habitat links to and from sites. It ties in with the policies of neighbouring authorities being consistent with national policies set out in PPS1, PPS5, PPS9, PPS25, PPG13 and by being based on county and regional GI studies and strategies, as well as local evidence and priorities.
4. Flexibility is provided, as these priorities will be delivered not only through development, but also through local initiatives i.e. Parish Plans and though Entry Level Stewardship schemes to encourage biodiversity and protect water quality.
5. Policy 1 requires new development and investment to “Expand and link valuable open space and areas of biodiversity importance to create green networks”. Detail is given in paragraphs 5.4. - 5.8.
6. The JCS provides the strategic requirement for GI, referring specifically to the role of other LDF documents in ensuring delivery (JCS1 paragraph 5.5).
7. In Norwich, Development Management and Site Specific policies are being drafted to require GI protection, delivery and management. Policy 1 and evidence in ENV2 are providing a valuable strategic framework for these policies and inform the definition of specific boundaries for strategic green corridors. Broadland and South Norfolk will adapt the JCS framework to their local needs through their subsequent LDF documents.

- C Is the right hand column of policy 1 fully reflective of the tests posed PPS9 in respect of different types of protected areas? In addition, what is the logic of referring only to ‘European’ protected species, as opposed to other protection lists (e.g. species protected under the Wildlife and Countryside Act)?

1. PPS9 states LDFs should make clear distinctions between the hierarchy of international, national, regional and locally designated sites. Policy 1 focuses on the need to protect internationally

designated sites and create links between them. The policy draws particular attention to internationally protected species and sites as these are locally distinctive issues highlighted in the AA (ENV1.1,1.2).

2. PPS9 also states LDFs should indicate locations of designated sites of importance for biodiversity and geodiversity and identify areas or sites for the restoration or creation of new priority habitats and support this restoration or creation through appropriate policies. JCS policy sets the necessary strategic overview. Development Management Policies and Site Allocations DPDs will provide more detailed policies to ensure the protection, management and enhancement of environmental assets.

- D [to note that GNDP has accepted that the key to the diagram on p35 is incomplete in that (i) certain colour shadings are unexplained, (ii) the phrase 'Green Infrastructure Opportunities' is seemingly incomplete, (iii) there is no mention of its indicative nature]

1. The need for amendments is accepted and is incorporated in minor changes (JCS2 and EIP93).

## Policy 2:

- E Is this justified, effective and consistent with national policy?

1. The policy requires development to achieve high standards of urban design. It is justified as it is based on a robust and credible evidence base:
  - The need for high quality development is established through research undertaken by the Work Foundation (EC6), which identifies high quality environments as a prerequisite for the growth of knowledge economies
  - The need for high quality development is strongly supported through public consultation responses.
  - Development must be locally distinctive (required by PPS1) and reflect the findings of local landscape character assessments (BD-B7, BD-SN7) and conservation area appraisals (BD-N5, BD-SN9, BD-B5).
2. It is the most appropriate strategy as it will promote high quality development by requiring developers to submit Design and Access Statements to ensure developments will meet nationally established CABI Building for Life (BFL) design standards relating to layout. Engagement with CABI stressed the need for the JCS to deliver the



highest possible quality of development. Larger developments are required to be masterplanned. A Design Review Panel has been set up to consider and advise on the quality of developments.

3. The policy is effective. It is inherently flexible as it requires development to be locally distinctive, adapting to spatially specific requirements within the three districts. Flexibility is also built into the BFL standards. Policy 2 will be monitored firstly through planning application validation, which requires Design and Access statements to include information that allows a preliminary BFL assessment to be undertaken for development proposals for 10 dwellings or more. Secondly, completed developments will be assessed by a BFL assessor and reported through Annual Monitoring Reports (AMRs). Both preliminary scoring and post development assessments are already being undertaken in Norwich and South Norfolk.
4. Policy 2 is consistent with national policy in PPS1, PPS5 and PPS9, most importantly the PPS1 requirement that all development should be high quality, locally distinctive and safe.

### Policy 3:

F Is this justified, soundly-based, effective and consistent with national policy?

1. The policy is justified. It is based on a robust and credible evidence base - ENV5 and ENV4.4b.
2. The studies are soundly based and followed the relevant national methodologies:
  - ENV5 followed the methodology set out in CLGs “Working Draft of Practice Guidance to support the PPS: Planning and Climate Change”, developed into web guidance provided by CLG, PAS and the HCA. <http://skills.homesandcommunities.co.uk/planning-and-climate-change>.
  - ENV4.4b’s methodology is in compliance with that promoted by the Environment Agency (EA) <http://publications.environment-agency.gov.uk/pdf/GEHO0109BPFF-e-e.pdf>
3. The policy is consistent with national policy as it complies with the PPS1 Climate Change supplement and PPS 12 (see response to F3). It sets specific requirements for water and energy elements of the Code for Sustainable Homes (CfSH), based on evidence studies showing there is a need for a positive policy approach to enable development to make best use of abundant sustainable energy potential and to reduce water use in an area of water stress.

F1 [bullet 1] Is it a reasonable planning requirement to link a development permanently into a particular 'dedicated, contractually linked decentralised and renewable or low carbon source'? How would this be monitored and enforced? What is the 'low carbon infrastructure fund', how is this 'justified' and how will it work? [see also 5.18]

1. Contractual links are intended to ensure energy is provided by new sustainable capacity to cover all needs generated by the individual development. This approach is practical in that it accepts the intermittent nature of some renewable energy sources and the potential for local energy generators to sell excess energy to the National Grid at considerable profit.
2. The approach requires promoters of new development to fund additional renewable or low carbon capacity which might be generated on site or in the locality, equivalent to the forecast energy consumption of the development, and that additional power created will not be "claimed" by other developers seeking to demonstrate a low carbon solution for their development.
3. The approach is reasonable. Developers are free to enter into the necessary commitment with a supplier of their choice. It is assumed, in the case of larger developments, many will want to provide for energy production on site and have a hand in the establishment of an Energy Service Company to ensure future maintenance.
4. Provided the arrangements outlined above been entered into, there is no reason why, in taking electricity from the national grid, the final occupiers of the development should not select their supply according to their own preference.
5. Enforcement would be through the demonstration of an agreement with an energy supplier, at the point where development is commenced, to provide additional capacity through renewable or low carbon technologies and an undertaking to implement the agreement as development progresses. The necessary safeguards could be secured through an appropriate condition or agreement when planning permission is granted.
6. Sustainable Energy Statements are required to ensure that developers of large scale projects can display how they will ensure development will provide dedicated sustainable energy supplies to meet the needs of the development.
7. In order to ensure first phases of large scale development contribute to the provision of a sustainable energy facility to serve the whole of the new development, rather than provide less cost effective small

scale plants, developers can pay into a low carbon infrastructure fund. This will ensure that developers do not opt for cheaper strategies in the earlier phases which jeopardise the ability of the development to achieve significant carbon savings in the longer term.

- This fund would be operated by the GNDP and/or the local authorities, with further detail set out in subsequent DPDs and SPDs where necessary.
- This approach is recommended in ENV5 (Recommendation 12, p7, with greater detail on pp5, 47 and 48).

F2 [bullet 2] Is the GNDP carbon offset fund a 'justified' concept and can it be implemented effectively? [see also 5.18]

1. The carbon offset fund is justified because it ensures small scale development can cost effectively contribute to the reduction of overall carbon emissions by investment in existing housing stock.
2. The policy approach for smaller scale development is to link to large scale sustainable energy sources rather than providing energy through more expensive on site microgeneration, or to contribute to a carbon offset fund to provide cost effective carbon reduction solutions where on site achievement of zero carbon standards is expensive. It recognises that in some instances it will be technically difficult and extremely expensive to achieve carbon neutrality within a development, particularly in smaller developments where fewer technologies are available. In these instances, where agreement is reached to accept a lower level of onsite carbon reduction than the policy would normally seek, the balance could be made up by a contribution to a carbon offset fund set up to offer grants to the occupiers of existing property to improve the energy efficiency of their property.
3. ENV5 concluded that this approach, rather than setting specific on site renewable energy targets as in RSS14, would promote low and zero carbon development cost effectively and is therefore justified.
4. This approach is aligned with emerging government policy set out in the consultation document Planning for a Low Carbon Future in a Changing Climate, which permits "allowable solutions", including off site generation of energy and possibly carbon offsetting, achieving zero carbon development on sites where there would be a lack of viable on site solutions, such as small-scale and infill sites. The type of allowable solutions will be dependent on the government's final definition of zero carbon homes. A recent parliamentary statement confirms support for this approach, stating off site provision will be permitted and should be co-ordinated by local authorities:  
<http://www.publications.parliament.uk/pa/cm201011/cmhansrd/cm100>

[727/wmstext/100727m0001.htm#10072727000016](http://727/wmstext/100727m0001.htm#10072727000016)

5. The detailed operation of the policy and appropriate contributions will be set out in Development Management DPDs or through an SPD after the “allowable solutions” are known, but it should clearly relate to a calculation of the cost to achieve carbon reductions comparable with those “forgone” on site. This enables flexibility to adapt to emerging government policy, as these policies can be drafted subsequent to the announcement of revisions to national policy, set for the end of 2010.
6. The fund should be capable of being administered in much the same way as funds received through section 106 or CIL.
7. A similar process is being established in relation to Rackheath, where an element of the proposal is to improve the energy performance of the existing housing stock through targeted grants.

F3 [bullets 3&4] Is this policy material justified, effective, and consistent with national policy in PPS supplement para 11 (re the need for Local Planning Authorities to adhere to the principle of not duplicating controls under planning and other regulatory regimes) and paras 31/32 (re the possibility of there being situations in which it ‘could’ be appropriate to anticipate levels of building sustainability in advance of national standards and, in such cases, demonstrating clearly ‘the local circumstances that warrant and allow this’ and focusing ‘on development area or site specific opportunities’)? What is the justification for departing from the national programme for strengthening the Building Regulations? Is the Greater Norwich Sustainable Energy Study sufficiently sound and convincingly based to support the mandatory approach set out in policy 3?

1. The policy is consistent with national policy. It:
  - Meets requirements of paragraph 11, PPS Climate Change supplement in that setting local standards for specific local issues complements rather than duplicates national building regulations;
  - Is supported by PPS12 paragraph 4.32 and PPS1 paragraph 31. Both national policy statements require local evidence to justify this.
  - Complies with the PPS1 supplement requirement (paragraphs 31 and 32) for local planning authorities to develop planning policies for new developments.
  - Complies with the PPS1 supplement in that local sustainability requirements for specific issues such as energy can be set provided that national standards such as the CfSH are used.
2. Thus, if a local planning authority is to require zero carbon standards for new development in advance of Building Regulations then it

needs to illustrate that zero carbon development is possible within the locality. The local evidence study found:

- The renewable energy resource locally is ample for the planned new development;
  - Zero carbon standards are achievable locally ahead of national requirements;
  - Dedicated renewables are possible for all development.
3. Accordingly, the policy in the JCS requires high standards of energy efficiency using the national standards and maximising the use of renewable energy given the proven local resource. This provides a flexible and more affordable approach by enabling offsite provision in line with recent government policy statements.

F4 [re 5.16 – last sentence] Would it be compliant with the tests in Circular 05/05 (and now Reg 122 of the CIL Regulations in respect of S106 agreements) to require new developments to contribute funds for improving the energy efficiency of existing houses?

1. The carbon offset fund would only be introduced if the government review of “allowable solutions” permit this (see response to F2), thus taking account of the requirements of Circular 5/5 and Regulation 122 of the CIL Regulations. Such an approach has been successfully implemented in Milton Keynes for a number of years.

F5 [re ‘Provision will be made for the strategic enhancement of the electricity and gas supply networks to support housing and employment growth. This will include major investment in existing electricity substations in central Norwich and to the east of Norwich’. Do the providers agree that this investment is likely to be completed in time to support any development contingent upon it? Has such contingent development been identified? What is it?

1. The relevant providers have been involved throughout the process. Discussion with EDF Energy confirmed that investment in infrastructure will be made available as required and will not be a constraining factor on development.
2. No constraints in the gas network have been identified by National Grid.
3. The LIPP (EIP85) sets out the main local network requirements to support development. It continues to be developed with ongoing engagement with utility providers.

F6 [re necessary water infrastructure referred to in policy 3 and paras 5.19 to 5.23.] Do the providers agree that this investment is likely to be completed in time to support any development contingent upon it? Has such contingent development been identified? What is it?

1. Anglian Water (AW) has been involved throughout the process, including the WCS.
2. Water providers are statutorily required to link new developments to foul sewerage networks under the Water Industry Act.
3. The LIPP (EIP85) sets out the strategic network requirements to support development. These are based on the findings of the WCS. Whilst this sets out possible solutions to water issues, AW will adopt the most appropriate solutions through their Asset Management Plans. Developers will be required to contribute to this.
4. We continue to engage with AW to seek solutions to ensure implementation of development, working with the regulators, the EA and Natural England.
5. Some unresolved water issues remain at certain growth locations:
  - quality and capacity issues at Long Stratton;
  - capacity and water quality issues at Reepham, which may require wastewater reduction or alternative disposal mechanisms;
  - the EA are working with AW on addressing Habitats and Water Framework Directive issues at Aylsham and Acle.
6. Position Statements will clarify the views of stakeholders for the Hearings.
7. In addition to the above, the JCS requires water infrastructure to be provided to support new development and ensure it does not have an adverse affect on water quality and supplies, particularly in relation to internationally protected sites. If these issues are not addressed, development will not be permitted.

F7 [re water efficiency] Does the standard sought in policy 20 imply a requirement in advance of national standards? Is this justified and deliverable? [See also 5.22]

#### National Standards

1. The standard set in policy 3 is a requirement in advance of national standards, which are set by Building Regulations in new dwellings at

a maximum water use of 120 litres per person per day inside the home. The policy sets the requirement for all development to maximise water efficiency, with smaller scale housing developments achieving CfSH level 4 for water (105 l/p/d) and large scale development, over 500 dwellings, achieving level 6 for water (80 l/p/d) by 2015. For non-housing development, it sets the requirement at BREEAM “Excellent” on adoption of the plan and “Outstanding” from 2015.

2. This is justified. It is based on national policy and a robust evidence base. PPS1 Climate Change Supplement (paragraphs 31 and 32) allow standards to be set locally in excess of Building Regulations provided that the requirement is tied to a national standard (the CfSH and BREEAM) and is included in a DPD (in this case, the JCS) and focuses on development area or site specific opportunities (the policy requires higher standards for large scale developments –see deliverability below). Most importantly there must be a demonstrable local need. In Greater Norwich, this has been demonstrated through the WCS, which recommends the high standards in the policy and the EA Water Stress Classification, classifying the region, with the lowest rainfall in the country, as “Seriously water stressed” (ENV4.4b).
3. The WCS highlighted that, although new water resources have been planned by AW, it is essential in sustainability terms that development minimises water use to ensure that water demand by the end of plan period is as low as possible, reducing the cost and environmental effect of providing new resources (Policy Recommendation 6, Water Efficiency, ENV4.4 (page 98).
4. The SA (JCS3 pages 50–51) and AA (ENV1.3/ JCS14.2 page 25) also provide justification for high standards of water efficiency to reduce the burden of wastewater flows that need to be treated development of water quality and protected environments. This approach meets the requirements of paragraph 11 of the PPS in that setting local standards for specific local issues complements rather than duplicates national building regulations.

#### Deliverability

5. Delivery will be ensured through the requirement for requiring CfSH and BREEAM assessments to accompany planning applications. If necessary, Development Management policies and SPDs can provide extra detail. This will enable monitoring of the policy through the AMR and planning conditions will be used to ensure the policy is implemented on site and to enable enforcement.
6. Waterwise East have been involved in developing this policy. Their research shows that the approach is deliverable as in a new development it is best (from a cost-benefit and sustainability viewpoint) to first consider reducing overall water consumption

through specifying water-efficient appliances before considering water recycling.

- Fittings-based strategies can be used to meet Code Level 3 and 4 (CLG estimates £125 per home).
- Recycling-based strategies can be used in combination with efficient fittings to achieve challenging water consumption target of Code Levels 5 and 6. As they are more expensive than fittings strategies, they are more suitable for large scale developments where economies of scale can be achieved.



# Greater Norwich Development Partnership

## Matter 9 The economy (policy 5)

**Note:** EIP93 sets out the minor changes to the text of JCS1 to address revocation of the Regional Spatial Strategy.

- A Does the JCS make appropriate spatial provision for aspects of economic development? Is it sound in respect of the core strategic guidance it provides to other Local Development Documents in terms of its assumptions about the necessary number of jobs to plan for, the provision of land for employment uses, the selected strategic employment locations (as set out in policy 9 and its accompanying text), clusters, town centres, tourism and the ‘flagship food and farming hub’?

1. The JCS provides comprehensive and reasonable guidance for LDDs. Supporting the economy and job growth is a fundamental theme that runs throughout the JCS and is promoted through a number of policies in addition to Policy 5, including green industries (Policies 1 and 3), house building, businesses that require population growth and the services that support it (Policy 4), industries that provide or rely on transport (Policy 6), social sectors (Policy 7), and cultural, leisure and entertainment sectors (Policy 8). Locationally specific economic issues are also addressed in all the Policies for Places (Policies 9-19). These set out the scale and, where necessary, the type of growth to be supported. This provides appropriate guidance for supporting significant clusters in the area.
2. Town centre issues are dealt with in Policies 11 and 19, and these are considered to fully accord with government policies.
3. Policies are fully supported by appropriate evidence and have been the subject of very few objections.
4. Implementation is supported by the LIPP (EIP85) and by the GNDP’s Economic Development Strategy and its supporting Action Plan (EC1.2). Progress on implementation is already being made in the city centre through the recently adopted Northern City Centre Area Action Plan and development of a masterplan for the St Stephens area.

5. Investment has already been made to bring forward development supporting key sectors. This includes investment in the Norwich Research Park, TGAC and Hethel Engineering Centre. In the city centre, the St Augustines Gyratory supports the Northern City Centre Area Action Plan and Barrack Street improvements support office development at Whitefriars. The LIPP includes a significant number of Economic Development and regeneration investment packages.
6. The job target for the GNDP was, and continues to be, supported by evidence. The latest run of the East of England Forecasting Model (EEFM) (Spring 2010) indicates job growth of 24,600 in the JCS period 2008-2026. This is summarised in EC7. The EEFM baseline forecasts are policy neutral with respect to local areas and the Topic Paper (TP2) explains why a slightly higher target is appropriate for the JCS.
7. The JCS provides strategic guidance on the location, type and scale of employment allocations to be made in DPDs. Topic Paper TP2 explains why the JCS over-allocates employment land. There is no evidence to justify the promotion by the JCS of further allocations for general employment use. Unjustified over allocation on greenfield sites will lead to strong pressures for alternative uses, such as retail, leisure and residential. Over allocation of greenfield sites would also undermine existing urban employment areas. Identified strategic employment locations are well related to major housing growth, proposed alternative locations are not.
8. The concept of a food hub in the Norwich area was originally considered by Norfolk's economic development partnership in 2006. Implementation of Food Hub proposals, broadened to a food cluster, was recommended as a priority intervention in the employment growth study (EC3 - in particular p22 and 27 but numerous other references to the importance of food related research and business). The inclusion of the Food and Farming Hub in the JCS is supported by a large number of respondents (JCS11) including EEDA, the NFU, Easton College and a range of business interests.

**B** If the JCS is unsound in relation to any of the above matters, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. The JCS is considered to be sound in relation to economy issues. Proposed minor changes (JCS 2 and EIP93) address drafting errors and provide clarity.



## Greater Norwich Development Partnership

### **Matter 10 Key service centres, Service Villages, and Smaller Rural Communities (policies 14-16)**

*Note: EIP93 sets out the minor changes to the text of JCS1 to address revocation of the Regional Spatial Strategy.*

#### **Key service centres (policy 14):**

A Does the JCS provide sound core strategic guidance for the future planning of these settlements? Does the evidence demonstrate that the key service centres are appropriately listed as such, with no additions/deletions?

1. The JCS is considered to provide sound strategic guidance taking account of the evidence, their place in the hierarchy and differentiated according to the characteristics and location of the settlement.
2. The criteria for their selection are set out in paragraph 6.43 of the submitted JCS.
3. The evidence base for the Housing Market Assessment (H3) identifies housing sub markets based on a number of factors in section 2. Housing sub market areas are defined for a number of key service centres including Long Stratton, Reepham and Wroxham (though the report at paragraph 2.7 notes that almost half of the dwellings in the Wroxham sub area lie in North Norfolk District. Others, in particular Brundall and Blofield in Broadland, Hethersett, Poringland, and Loddon/Chedgrave in South Norfolk lie within the Norwich sub market. Hingham lies within the Wymondham sub market.
4. The Greater Norwich Retail and Town Centres Study (EC4) confirms that the key service centres which are not in the immediate Norwich area generally offer a range of retail facilities to the surrounding rural areas, but below the level of those in the main towns. This is indicated by the data on the make up of the retail offer at paragraphs 9.32 (Reepham) 9.4 (Acle) and 10.72 (South Norfolk rural centres - Hingham and Loddon).
5. The Employment Growth and Sites and Premises Study (EC3) considers rural centres generically in chapter 5

6. Development at Acle and Reepham will be dependent upon the resolution of waste water disposal uncertainties raised at a late stage of the Water Cycle Study that await clarification by updated statements by Anglian Water and The Environment Agency to be submitted prior to the Examination.

B Is the scale of the development for the individual villages soundly based?

1. The scale of growth proposed is explained in the topic paper on the Settlement Hierarchy (TP 7, section 5 commencing on page 20)

2. The criteria for inclusion in this category are set out in para 6.43 of the submitted JCS. This makes it clear that the key service centres with more limited services and no secondary school have housing allocations towards the lower end of the range. These are Brundall and Blofield in Broadland, and Hingham in South Norfolk. Brundall and Blofield are both close to the Norwich urban area, both have a reasonable range of facilities including community halls, primary schools, primary health care, libraries and a limited range of shops, but no secondary school. For the avoidance of doubt it should also be made clear that there is no school and relatively few facilities in Wroxham, (though there is a library) but taking into account the adjacent settlement of Hoveton, separated by the river Bure but linked by a bridge, there is a wide range of facilities including a secondary school, primary care, local employment, convenience and comparison shopping.

3. The scale of development at Acle and Reepham will be dependent upon the resolution of waste water disposal uncertainties raised at a late stage of the Water Cycle Study that await clarification by updated statements by Anglian Water and The Environment Agency to be submitted prior to the Examination.

**The service villages (policy 15):**

C Does the JCS provide sound core strategic guidance for the future planning of these settlements? Does the evidence demonstrate that the service villages are appropriately listed as such, with no additions/deletions?

1. The criteria for the definition of service villages are set out in paragraph 6.57 of the submitted JCS. Given the modest scale of allocation in each village, the strategy is considered to give an

appropriate level of guidance.

2. The topic paper on the settlement hierarchy (TP 7) sets out the considerations underlying the selection of settlements at this level of the hierarchy, including the evolution of the consideration at different stages in the core strategy's preparation within Section 4 of the topic paper. This explains how a broadly consistent approach is adopted while still taking into account the very different natures of the rural parts of the two districts. Within document TP7, Appendix 4/ Table 2 shows overall services totals and the "important services" available in each service village.
3. It should be noted that some villages appear to have a sufficient total number of services to justify a "service village" definition, but are defined in the lower "other villages" category. This reflects their lack of sufficient "important services", lack of easy access to such services, and/or their lack of journey-to-work public transport services. Journey-to-work public transport availability was considered to be the minimum required to promote sustainability. These villages are listed in the footnote to TP7, Appendix 4, Table 2.

D Is the scale of development for the individual villages soundly based?

1. Policy provides broad guidance around a range of development scales to take account of individual circumstances in each village. This approach is considered to be sound for a core strategy.
2. Section 5 of TP7 discusses the different levels of growth assigned to different levels of the hierarchy.
3. The strategy allows for an appropriate scale of housing land allocations in the "service villages" to meet local housing needs and to maintain their continued sustainability and enhanced quality of life.

**Other villages (policy 16):**

E Does the JCS provide sound core strategic advice for the future planning of these villages? Does the evidence demonstrate that the other villages are appropriately listed as such, with no additions/deletions?

1. The JCS is considered to provide sound strategic guidance for the "other villages" based on the criteria set out in paragraph 6.61 of

the JCS and on the basis of the review of the Settlement Hierarchy villages described by the Settlement Hierarchy Topic Paper: TP7 (Section 4.6).

2. Topic Paper TP7, Appendix 4, Table 1 confirms the required distributions of services and facilities required to justify the definition of the Other Villages which are considered to be appropriately listed.

**Allowance for development on ‘smaller sites in the NPA’ (policies 9 and 14-16):**

- F Is it clear what mechanism(s) will be used for resolving whether or not ‘*additional development*’ is necessary at any of the key service centres, service villages or other villages ‘*to deliver the “smaller sites in the NPA” allowance*’? To be effective on this point, should the JCS be clearer/more specific about this? What would it need to say?

1. The JCS is considered to be clear. Policy 9 makes it clear that allocations to deliver the smaller sites allowance will be made “in accordance with the settlement hierarchy and local and environmental and servicing considerations”. Paragraphs 6.45 and 6.58 both make clear that the criteria are “having regard to sites which can be made available in higher order settlements as set out in the settlement hierarchy”. The only mechanism for the allocation of land is a DPD, and therefore the only plan making mechanism which can be used to resolve the issue is through the site specific policies DPD. The JCS makes it clear that the search for suitable sites should begin with the higher order settlements. However, the text supporting the policy for the service villages makes clear (para 6.58) that the indicative scale of 20 dwellings may be exceeded where the development of a site can be demonstrated to improve local services or protect those under threat, where it is compatible with the overall strategy, and subject to sustainability considerations.
2. Policy 16 “Other Villages” supporting text paragraph 6.62 also states the exceptional circumstances in which a larger scale of development might be permitted.

- G If the JCS is unsound in relation to any of the above matters, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. The JCS is considered to be sound in this respect. Proposed minor changes (JCS2 and EIP93) address drafting errors and provide clarity.