

15 July 2010

Helen Ward
Planning and Conservation Adviser
Norfolk & Suffolk Government Team
Natural England
Dragonfly House
2 Gilders Way
Norwich
NR3 1UB

Your ref: LA8.1

Dear Helen,

Joint Core Strategy for Broadland, Norwich and South Norfolk

I am writing to you in response to your letter dated 26th May to inform you of recent progress made by the Greater Norwich Development Partnership on water issues, green infrastructure and Appropriate Assessment and to provide further clarification of relevant issues. This approach was agreed with Anglian Water in June this year in one of a series of meetings between the GNDP and the water company.

As a follow up to this letter, the GNDP intends to invite Natural England, the Environment Agency and Anglian Water to a meeting in September to agree the content of revised Position Statements prior to the Examination in Public of the Joint Core Strategy in November 2010. This will, however, be dependent on the publication of the Environment Agency's Review of Consents, which we understand to be complete but awaiting amendments in relation to confidentiality issues.

Your letter stated that "In order for Natural England to provide support to the GNDP at the forthcoming Examination in Public, you will need to satisfy us that the Appropriate Assessment has been completed, it is robust, and no adverse effect on site integrity can be concluded for all of the Natura 2000 sites." The Appropriate Assessment of the Joint Core Strategy was completed in August 2009. The assessment concluded that compliance with the Water Framework Directive would enable protection of Natura 2000 sites.

Jobs, homes, prosperity for local people



NORWICH
City Council



Norfolk County Council

As agreed at the meeting between Water Cycle Study partners held in Dragonfly House in early 2010, further Appropriate Assessment of development that takes place prior to the adoption of the strategy is needed. The Environment Agency have now agreed that this Appropriate Assessment can be done prior to the release of the full Review of Consents. As a result of this, Appropriate Assessment of such development is now being undertaken by consultants and is likely to be completed over the summer.

Joint Core Strategy policies 1 and 3 set out the requirement for green and water infrastructure to be supplied to support development. The Integrated Development Programme (IDP), which will be submitted with the Joint Core Strategy, will provide some more detail on this infrastructure and the process for ensuring its delivery.

In relation to green infrastructure, the Appropriate Assessment concluded that "A significant area north of Rackheath should be provided as green space to ensure that there are no significant adverse impacts on the Broads SAC. This area is to act as an ecological buffer zone between the development area and the designated site." Whilst policy 1 of the Joint Core Strategy sets out the requirement for new development to provide green infrastructure, the IDP and other Local Development Framework documents will identify specific green infrastructure provision required to support development. Appendix 5 of the Schedule of Focussed Changes of the Joint Core Strategy, to be available on the GNDP website from late July, is a strategic allocation concept statement for the Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle. It provides some detail on open space and green infrastructure to serve this major growth area.

Although green infrastructure will help to reduce visitor pressure on European protected habitats, site specific management issues on Natura 2000 sites beyond the scope of the Joint Core Strategy will also be key to ensuring visitor numbers remain at levels which will not harm the protected habitats.

In relation to water infrastructure, the Water Cycle Study has set out a strategy for waste water and water supply infrastructure. This has informed policy in the Joint Core Strategy. Policy 1 requires development to have no significant adverse impact on European designated sites and species and policy 3 requires all new development to protect water quality and to be water efficient. Appendix 8 of the Joint Core Strategy sets out likely water infrastructure requirements.

The Water Cycle Study is informing Anglian Water's decisions on waste water and water supply infrastructure provision. The company are legally required to serve the water infrastructure needs of development without causing harm to habitats protected under the Habitats Directive and the Water Framework Directive.

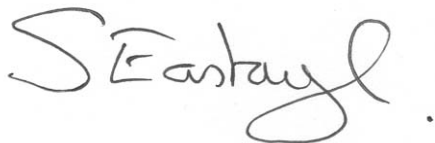
The Anglian Water "Water Resources Management Plan", adopted in February 2010 and agreed by the Environment Agency, provides a robust and flexible strategy to enable the company to meet legal requirements. Anglian Water's Position Statement on the Water Cycle Study states that "Sewerage

provision will be challenging and a potential strategy has been outlined. This will of course be developed when detailed site locations are available.”
Wastewater consents detailed in the Water Cycle Study took account of the Review of Consents and have been agreed by the Environment Agency.

Therefore, whilst it is not possible at this stage for the IDP to set out the exact nature of the infrastructure Anglian Water will supply to support new development, likely infrastructure needs have been identified by the Water Cycle Study and incorporated in the Joint Core Strategy.

To conclude, two measures ensure that protected habitats will not suffer harm from new development. Firstly, policies 1 and 3 of the Joint Core Strategy specifically require all new development to protect designated sites and water quality, to be water efficient and to provide green infrastructure. Secondly, Anglian Water are legally required to ensure that adequate infrastructure is provided in a timely manner to ensure that new development meets the requirements of the Habitats Directive and the Water Framework Directive. Funding of the water infrastructure required to protect habitats will be provided by developers and Anglian Water. Green infrastructure will be funded by a combination of funding streams, including developer contributions and normal revenue budgets. We are sure Natural England will wish to play a full part in the delivery of the green infrastructure.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S Eastaugh', followed by a period.

Sandra Eastaugh
Partnership Manager

t: 01603 638301
e: s.eastaugh@gndp.org.uk