

Greater Norwich Development Partnership



Regulation 30 (1) (e) Statement

Joint Core Strategy for Broadland, Norwich and South Norfolk
Submission Document

February 2010

Jobs, homes, prosperity for local people



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1. Introduction

1.1 This statement provides information on the representations received about the Submission Development Plan Document (DPD). It is prepared under Regulation 28 and 30 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008, which requires that a local planning authority must send to the Secretary of State a statement setting out:

- If representations were made in accordance with Regulation 28(2) the number of representations made,
- Copies of the representations,
- A summary of the main issues raised in the representations, or
- A statement that no representations have been made.

1.2 A copy of this document is available on the Greater Norwich Development Partnership's (GNDP) web site at www.gndp.org.uk and at the offices of Broadland District Council, Norwich City Council, South Norfolk Council and Norfolk County Council.

1.3 The Joint Core Strategy will be formally submitted to the Secretary of State on the 5th March 2010 following publication and a consultation period which ran from the 2nd November until the 14th December 2009 (a period of 6 weeks). During this period, copies of the Submission Document and all accompanying documents were made available for inspection at the offices of the County Council and local planning authorities, as well as at council information centres, libraries in the three districts, and at a mobile information centre which circulates in villages in Broadland.

1.4 A public notice advertising the publication for the Joint Core Strategy Submission document was published in the Eastern Daily Press and Eastern Evening News on 2 November 2009 and the following weekly publications; Great Yarmouth Mercury, Beccles and Bungay Journal, North Norfolk News, Norwich Advertiser, Wymondham and Attleborough Mercury and Diss Mercury. A further notice for the Submission to the Secretary of State of the Joint Core Strategy will be published in the same publications in the week commencing 8 March 2010.

2. Statement of the total number of representations made as required under Regulation 30 (1) (e) (I)

2.1 In total, 163 organisations and individuals made a total of 570 representations on the core strategy submission document. Of these, five submissions were received outside the specified period. The following table summarises by section and policy the number of representations received.

Policy Number	Section/Policy title	Sound	Unsound	Total Reps
N/A	Our strategy	16	20	36
N/A	Introduction	0	5	5
N/A	Spatial portrait	1	8	9
N/A	Spatial vision and objectives	21	35	56
1	Addressing climate change and protecting environmental assets	2	12	14
2	Promoting good design	4	8	12
3	Energy and water	3	24	27
4	Housing delivery	6	29	35
5	The economy	21	12	33
6	Access and transportation	9	24	33
7	Supporting communities	4	6	10
8	Culture, leisure and entertainment	1	1	2
9	Strategy for growth in the Norwich policy area	17	42	59
10	Locations for major new, or expanded, communities in the Norwich policy area	17	40	57
11	Norwich city centre	4	10	14
12	The remainder of the Norwich urban area, including the fringe parishes	5	14	19
13	Main towns	4	6	10
14	Key service centres	6	12	18
15	Service villages	24	11	35
16	Other villages	4	8	12
17	Smaller rural communities and the countryside	2	1	3
18	The Broads	1	0	1
19	The hierarchy of centres	4	7	11
20	Implementation and monitoring	8	20	28
Appendix 1	Relationships to other strategies	0	1	1
Appendix 2	Supporting documents	0	2	2
Appendix 3	Superseded policies and changes	8	2	10

	to local plan proposals maps			
Appendix 4	Definition of the Norwich policy area	2	1	3
Appendix 5	Coverage of the Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle	0	0	0
Appendix 6	Housing trajectory	0	5	5
Appendix 7	Implementation framework	1	3	4
Appendix 8	Monitoring table	0	5	5
Appendix 9	Glossary	0	1	1
Total		195	375	570

3. Summary of main issues raised in the representations as required under Regulation 30 (2) (c) (iii)

Legal compliance

3.1 A limited number of representations challenge the legal compliance of the JCS. One representation is supported by counsel's opinion. These challenges relate to:

- Process issues including the nature of the decision making structures, premature decision making in relation to the availability of evidence, and the public availability of evidence, agendas and minutes.
- The failure to deliver sustainable development as required by the Planning and Compulsory Purchase Act 2004.
- Failing to consider properly the outcome of the sustainability appraisal.
- Internal inconsistencies in the strategy

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

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

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

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

Deliverability

3.5 Challenges to deliverability include those relating to:

- The lack of detail in the Implementation Schedule and challenges to apportionment of costs.
- The failure to consider better alternatives resulting in a dispersed pattern of growth in South Norfolk that will make the delivery of strategic infrastructure more difficult.

- A level of growth in the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle could proceed ahead of, or without, additional infrastructure and in particular the NDR. A related argument challenges the ability to bring forward the development fast enough to deliver the required level of growth in the JCS period.
- The strategy is insufficiently flexible with no alternatives to take account of undelivered infrastructure or unexpected delays to housing locations.
- the ability to deliver the strategy in relation to Long Stratton.
- timely implementation of water infrastructure.

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

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

Policy 4: Housing delivery

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

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

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

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

- 3.10 Key challenges include:

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

3.11 While there are a range of significant challenges to the JCS, the majority of issues raised have already been considered, and these are not considered to undermine the soundness of the Strategy.

4. Representations not duly made

- 4 .1 Five representations were received outside the advertised period, and are therefore not technically valid. They have, however, been included in the numbers in the table earlier in this document. This is because they either consider the strategy sound, or raise issues which have been raised by other representations and which will be considered in any case.

5. Joint Core Strategy: Key Challenges at the Publication Stage

Policy/Area of Challenge	Key Challenge	Initial GNDP response
Legal Compliance (Process)	Lack of transparency in decision making The Greater Norwich Development Partnership's decision-making processes are fundamentally flawed and not sufficiently transparent	<ul style="list-style-type: none"> • The Greater Norwich Development Partnership (GNDP) was established as an informal partnership of Broadland, the City of Norwich, South Norfolk and Norfolk County Councils to implement the requirement of the Regional Spatial Strategy for a joint approach to the planning for Norwich and its surrounding area. • The production of policies by the partnership was informed by a group of officers from each local authority backed by evidence studies and the results of technical and public consultations. This was overseen by informal meetings of the GNDP Policy Group comprising appropriate Cabinet Members of the GNDP local authorities. • The decisions on the adoption of policies were taken by the GNDP local authorities through their individual council Cabinet and full Council meetings. • The public was made aware of the successive stages of decision making through the publication of agendas for the Cabinet and full Council meetings.

Policy/Area of Challenge	Key Challenge	Initial GNDP response
	<p>The Greater Norwich Development Partnership and its constituent authorities have failed to give sufficient weight to the requirement in law to produce a strategy founded on sustainability. There is a mismatch between the strategy and the outcome of the sustainability appraisal</p>	<ul style="list-style-type: none"> • Sustainability appraisals are intended to examine the social, economic and environmental impacts of proposed policies to inform their potential suitability as a basis for sustainable development. • The values applied to the positive and negative impacts identified by such appraisals are intended to inform but not specify the choice of policies and overall strategy. • The choice of policies and overall strategy for growth in the Joint Core Strategy is the result of an interpretation of the sustainability appraisal outcomes, technical and public consultations, continually emerging new evidence and the consideration by elected Members of growth options in the above context.
	<p>Elements of the evidence base were produced too late to have had any influence in the development of the strategy and gave rise to the late appearance of Water and Energy designs and policies which were not sufficiently developed in earlier consultations</p>	<ul style="list-style-type: none"> • Following the Regulation 25 Technical Consultation (August 2008), officers and elected Members considered that the policy emphasis on the overall need to address climate change and the need to make the most efficient use of energy, water and natural resources required updating as a result of rapidly changing government policy, in addition to improvements to other policies to promote sustainable development, place shaping, and local distinctiveness. Most of these issues had been addressed in the Technical Consultation strategy but in a less focused way. • The Regulation 25 Public Consultation (March 2009) strategy (paras. 8.1/8.2) referred to the need to provide for a local energy study to inform an energy plan and set local energy standards and the need for an overarching policy. • However the supporting evidence studies to justify the specific policy requirements for energy conservation had not

Policy/Area of Challenge	Key Challenge	Initial GNDP response
		<p>been completed at this stage because their methodology depended on the publication of the necessary government advice for such studies to meet the requirements of government policies in PPS 1 “Planning and Climate Change – Supplement to Planning Policy Statement 1 (December 2007)”.</p> <ul style="list-style-type: none"> • Although The Water Cycle Study Stage 1 was started in 2007, i.e. before the relevant Environmental Agency guidance was published in January 2009. The scope of the subsequent studies required ongoing work that has revealed that water efficiency will be a key requirement to enable delivery of the proposed growth.
Internal inconsistencies of strategy	There are internal inconsistencies within the strategy, in particular there are tensions between the environmental and carbon reduction targets policies and objectives and the scale of growth and transportation strategy.	<ol style="list-style-type: none"> 1. Strategies will always have policy aims that may be in conflict. The intention is to provide for growth and change in the most sustainable manner. 2. The impacts of the strategy’s provisions for growth and new roads have to be considered as a whole. The Joint Core Strategy and the Norwich Area Transportation Strategy (NATS) promote a range of transportation measures to accommodate the increased demand for travel that will inevitably arise from significant growth. The measures are a range of public transport enhancement, improved walking and cycling opportunities and road building and capacity improvements to the existing road network. 3. NATS provisions are intended to produce a combination of environmental and sustainable transport benefits for both existing and new populations, and to meet the requirement to deliver a major shift towards public transport as stated in Policy NR1 of the East of England Plan. Additional transport modelling work has been carried out to clarify the benefits of

Policy/Area of Challenge	Key Challenge	Initial GNDP response
		<p>the Northern Distributor Road. These will include environmental benefits and the potential to free up existing road space in Norwich for the enhancement of public transport, walking and cycling. A Long Stratton bypass already has planning permission.</p>
Evidence base	<p>Inadequacy of the evidence base. The objections relate in particular to the incomplete Water Cycle Study, Appropriate Assessment and modelling to support the Norwich Area Transportation Strategy at the time of consultation and pre-submission publication. There are also challenges to the conclusions reached in various studies, including the Infrastructure Needs and Funding Study, Sustainable Energy Study and the Employment Growth and Sites and Premises study.</p>	<ul style="list-style-type: none"> • Although The Water Cycle Study Stage 1 was started in 2007, i.e. before the relevant Environmental Agency guidance was published in January 2009, the scope of the subsequent studies has required ongoing work that has revealed new issues that are still to be resolved. • The Water Cycle Study has involved a multi-stage approach involving several iterations to advise on the broad suitability of general locations for growth, the suitability of specific locations for growth and the specific infrastructure requirements to provide for the preferred growth option. • The outcomes of this study have been affected by the uncertainties affecting water supply and effluent treatment and disposal arising from the ongoing review of Consents by the Environment Agency, and uncertainties arising from the timing of the Anglia Water Asset Management Plans and the Anglia Water Resources Management Plan (WRMP). The review of Consents is due to be finalised in March 2010. The WRMP is not due to be published until later in 2010. • The Appropriate Assessment must acknowledge the above uncertainties. In these circumstances, Natural England may be unable to sign this off. • Additional transport modelling work has been carried out to better understand the effects of the likely NATS implementation package and the relationship of the Northern

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		<p>Distributor Road to the package of proposed sustainable transport measures and the chosen growth option. This work has taken additional time to complete, in part as a consequence of the carrying out of extra work for the Department for Transport to support “Programme Entry” (i.e. for consideration in the relevant Regional Funding Allocation).</p> <ul style="list-style-type: none"> •
Deliverability	<p>There is a lack of detail in the Implementation Schedule and challenges to some of the costs and the apportionment of costs between different strategic growth areas within the Norwich Policy Area, and a lack of flexibility in the strategy to accommodate the proposed growth if major infrastructure requirements such as the northern distributor road are delayed or not delivered. Doubts are also expressed about the deliverability of the necessary water infrastructure taking into account environmental constraints</p>	<ul style="list-style-type: none"> • The Implementation Schedule is intended to provide an indication of the requirements for and provision of the necessary services and facilities. This information is being clarified in the associated Integrated Development Programme. This will provide a basis for discussions with services and infrastructure providers to establish the final costs and implications of infrastructure delivery. Any proposed Community Infrastructure Levy (CIL) would need to be the subject of a separate submission and examination. Early consultations by the Government on a CIL recognised that a decision at this stage is likely to be impossible.
	<p>The relative dispersal of strategic growth within South Norfolk makes the delivery of “big infrastructure” more difficult</p>	<ul style="list-style-type: none"> • Evidence based on the “Greater Norwich Infrastructure Needs and Funding Study”(2009) suggests that the necessary infrastructure can be provided. The detailed delivery of the required infrastructure will be confirmed in the Integrated Development Programme. •

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	Some of NE development could proceed before additional (particularly road) infrastructure	<ul style="list-style-type: none"> • The intention of the strategy is that the development area to the north east should be developed in a coordinated approach dependent upon a commitment to the delivery of the Northern Distributor Road. • A fragmented approach would be unlikely to provide satisfactorily for other high level infrastructure such as green infrastructure, secondary education, renewable energy, or that required for sustainable transport.

Policy/Area of Challenge	Key Challenge	Initial GNDP response
	<p>A lack of flexibility of the strategy to accommodate the proposed growth if major infrastructure requirements such as the Northern Distributor Road are delayed or not delivered.</p>	<ul style="list-style-type: none"> • It is accepted that there remains some uncertainty over the provision of major infrastructure. This is to be expected. However uncertainty will be managed through the Integrated Development Plan process, through the development of the appropriate delivery arrangements, and further development funding options such as the CIL. • The strategy does include some flexibility to deal with delayed delivery by over allocating land for housing and employment development. The strategy also provides for housing growth in significant locations as minimum targets, thus allowing for a degree of additional development through applications and allocations to deal with delays elsewhere. • The Northern Distributor Road (NDR) has recently gained “Programme Entry”. As with any significant infrastructure project there is always some uncertainty over the precise delivery on the scheme. The NDR now has greater certainty over funding and is promoted in the County Council’s 2nd Local Transport Plan and the Regional Spatial Strategy. There is a clear timetable for the next stage of statutory process. Should the NDR not proceed, there would need to be a fundamental review of the spatial distribution of growth promoted in the JCS.

Policy/Area of Challenge	Key Challenge	Initial GNDP response
	The proposals for major growth in Long Stratton cannot be delivered.	<ul style="list-style-type: none"> • The major landowners to the east of the village have supported the proposed submission version of the Joint Core strategy in terms of the level of growth at Long Stratton, the need for growth to be accompanied by a bypass, and policies relating to the economy, access and transportation, supporting communities and implementation. • A number of sites to the west of the village have also been proposed. • The Water Cycle Study indicates that growth above 1400 dwellings can only be accommodated if innovative solutions that meet the requirements of the Water Framework Directive and Habitats Directive are to be implemented. • The 1800 units total is a minimum allocation. However further increases could trigger other significant infrastructure including the need for a new/relocated high school, and have additional impacts on unimproved sections of the A140.
	Deliverability of water infrastructure to meet issues raised in the Water cycle study (EA)	<ul style="list-style-type: none"> • The Water Cycle Study has identified issues regarding the availability of water related infrastructure which could have implications for the provisions for new development. • These issues remain to be resolved as soon as possible in association with the Environment Agency, Anglian Water and Natural England.
Policy 2 : Promoting good design	Many representations claim it is unreasonable to seek building for life silver standard. Some argue that other aspects of the policy are not necessary in that they should have been taken into account in the definition of the strategy. The question of density is raised, as are a number of issues	<ul style="list-style-type: none"> • Objections relate to the interpretation of the CABE “Building for Life” criteria. The strategy is considered to be justified in requiring compliance with a defined set of standards. It is considered that all settlements defined by the strategy as being suitable for new housing land allocations enable development to meet the standards required.

Policy/Area of Challenge	Key Challenge	Initial GNDP response
	of detailed wording.	
Policy 3: Energy and Water	Justification of water and energy policies. The policies will harm the viability of sites.	<ul style="list-style-type: none"> The policies are considered to support the requirements of government policy in PPS 1 “Planning and Climate Change – Supplement to Planning Policy Statement 1 (December 2007)” and East of England Plan Policies ENG 1, ENG 2 and WAT 1, within the context of the outcomes of the relevant evidence studies. Further evidence has increasingly supported the need for the water-related policies.
	Tougher water targets should be promoted	<ul style="list-style-type: none"> The Water Cycle Study supports standards above the national levels. (See the attached appendix addressing this issue).
Policy 4 : Housing delivery	The percentage of affordable housing sought should not be uniform across the area, more are needed, insufficient attention has been paid to viability (Blyth Valley issue) and the policy needs to be more explicit in its acknowledgement of viability as an issue. Other representations focus on the need to be more explicit about the type of housing required, particularly in dealing with an aging population. A number of representations are directed towards the scale of development, some saying there is insufficient housing land allocated, others arguing there is too much housing proposed, and referring to potential environmental impacts. There are some references to the aspects of the policy	<ul style="list-style-type: none"> Objections relate to the impact of the viability of new housing of the requirement for a 40% affordable housing requirement where developers are also required to financially provide for a range of other development–related services and infrastructure requirements. The Blyth Valley reference refers to a high court appeal to oppose a 30% affordable housing requirement for all new developments of ten or more dwellings in the Blyth Valley Core Strategy. This policy had previously been considered to be “sound”, but was subsequently declared to be “unsound” on the basis that the Government Planning Inspector had failed to consider the economic viability of the policy. Evidence from local housing needs assessments suggests that 43% affordable housing should be a requirement over the Joint Core Strategy area, but local experience has shown that 40% is the maximum achievable without a public

Policy/Area of Challenge	Key Challenge	Initial GNDP response
	relating to Gypsies and Travellers, mainly matters of detailed wording.)	<p>subsidy.</p> <ul style="list-style-type: none"> • The “Greater Norwich Infrastructure Needs and Funding Study” (2009) accepted the proposed 40% affordable housing target in its assessment of housing development trajectories and associated infrastructure provisions, and its assessment of the potential for “land value capture”. This also took account of varying assumptions about the housing market. • More detailed work has been done in relation to where the prevalence of brown field sites means that viability is a more acute issue. • The strategy accepts that viability may be an issue. Therefore Policy 4 makes clear that “In negotiating the proportion and tenure of affordable housing, account will be taken of site characteristics and the economic viability of provision.” • Therefore it is considered that the policy provides for the appropriate consideration of the affordable housing target.
Policies 9 (Strategy for Growth in the NPA) & 10 (Locations for-- --)	Challenges to the rationale for the scale of growth proposed in Long Stratton and Easton in particular	<ul style="list-style-type: none"> • The overall strategy for growth in the Joint Core Strategy is the result of an interpretation of sustainability appraisal outcomes, technical and public consultations, continually emerging new evidence, and the consideration by elected Members of growth options in the above context. • The rationale behind the consideration and selection of the area is set out in the topic paper “Strategy to Accommodate Major Housing Growth in the Norwich Policy Area”. •
	Promotion of more growth in named growth locations, especially Wymondham &	<ul style="list-style-type: none"> • The overall strategy for growth in the Joint Core Strategy is the result of an interpretation of sustainability appraisal

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	Hethersett	<p>outcomes, technical and public consultations, continually emerging new evidence, and the consideration by elected Members of growth options within this context.</p> <ul style="list-style-type: none"> • The rationale behind the consideration and selection of the area is set out in the topic paper “Strategy to Accommodate Major Housing Growth in the Norwich Policy Area”.
	The Scale, nature, existence of better alternatives, inability to deliver rates of development not achievable, and a dispersal approach is more preferable are all challenges raised to the major growth location proposed to the North East of Norwich.	<ul style="list-style-type: none"> • The strategy provides for the major growth area to the north east to be developed in a single coordinated approach dependent upon the delivery of the Northern Distributor Road. • The rationale behind the consideration and selection of the area is set out in the topic paper “Strategy to Accommodate Major Housing Growth in the Norwich Policy Area”.
Policy 12	More clarity is needed on locations for “floating” allocations within the Broadland and South Norfolk fringes for Norwich	<ul style="list-style-type: none"> • The small sites allowance is specifically intended to provide some flexibility. The strategy makes it clear that sites will be selected in accordance with the Settlement Hierarchy.
Policy 13	Insufficient consideration of role of Market Towns, especially Diss and its cross boundary issues with neighbouring authorities outside the area of the Joint Core Strategy	<ul style="list-style-type: none"> • The identification of the market towns was based on a long standing context including previous local plans and policies of the Norfolk Structure Plan (1999). The proposed scales of growth reflect the policies of the East of England Plan. • Market town functions were acknowledged by their inclusion in two studies. The Norwich Sub-Region Retail and Town Centres Study (2007) examined the vitality and viability of their centres and their potential for retail and leisure growth. The Greater Norwich Employment Growth and Sites and Premises Study (2008) examines their wider economic role.

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		<p>The strategy reflects this evidence.</p> <ul style="list-style-type: none"> • The provisions for Diss reflect its role and extensive rural catchment. Its location on the County boundary was considered to mean that larger scale growth could require development across the boundary in Suffolk which would not contribute towards the growth to be provided for by the strategy. However this issue was not formally addressed. • South Norfolk Council could consider more detailed strategy development through subsidiary local development documents and is currently producing an Area Action Plan to inform the implementation of development in a central part of Diss.
Policies 13-17	Unclear rationale for housing numbers in towns, Key Service Centres, Service villages ant other villages	<ul style="list-style-type: none"> • The East of England Plan provided for most growth to be focused on the Norwich Policy Area which is expected to accommodate some 89%-92% of growth. The strategy apportions the remaining growth to locations reflecting their positions in the Settlement Hierarchy and known local constraints and services provision. • The rationale behind the provisions for growth in the Settlement Hierarchy is referred to in the “Settlement Hierarchy” topic paper.

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