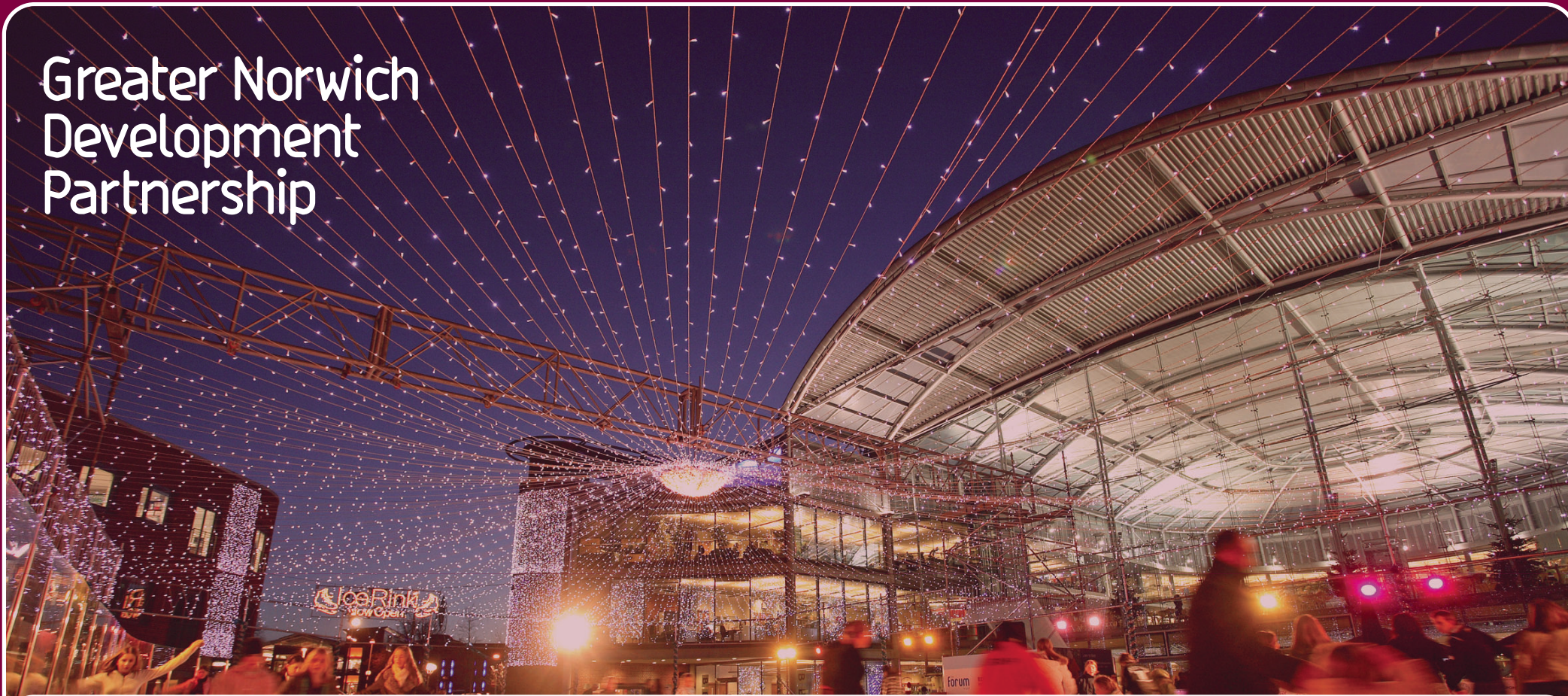


Greater Norwich Development Partnership



Soundness Self Assessment

Joint Core Strategy for Broadland, Norwich and South Norfolk

March 2010

Jobs, homes, prosperity for local people



Joint Core Strategy for Broadland, Norwich and South Norfolk

Local Development Framework soundness self assessment

Introduction

This document has been prepared by the Greater Norwich Development Partnership as an objective self assessment of the soundness of the Joint Core Strategy for Broadland, Norwich and South Norfolk. Throughout the production of the plan, the GNDP has used the 'Soundness Toolkit' produced by the Planning Advisory Service (PAS) to help ensure that evidence requirements are met and that we fully comply with statutory requirements.

The toolkit reflects the revised Planning Policy Statement 12, the Plan Making Manual and Local Development Framework Regulations (and the Amendment). It is made up of two components, the first which concerns the legal compliance aspects and the second which focuses on the test of soundness.

The legal compliance toolkit in Appendix 1 has been compiled for each stage of development of the strategy and the comments made and evidence provided is relevant to the particular stage reached (and may be updated in later stages of the document). There are gaps in the final 'Submission' section of this toolkit which relate to work that remains to be completed as part of the submission process. This document will be updated post-submission and a revised version will be published.

Appendix 1 – Legal Compliance

Stage 1: Inception (SA Scoping and workshops)

Activity	Evidence provided
<p>1. Is the development plan document identified in the adopted local development scheme and have you recorded the timetable for its production?</p>	<p>Each of the three authorities included a Core Strategy within the first LDS published in 2005. Agreement in December 2006 to do a Joint Core Strategy resulted in each of the three authorities revising their LDS in 2007 in order to accommodate the new timetable and purpose of the document.</p> <p>The Joint Core Strategy was recorded as commencing in January 2007 in all three of the local authorities 06/07 AMRs. Update on progress has been included in all the subsequent AMRs.</p> <p>See 2005 and 2007 LDS for Broadland, Norwich and South Norfolk Council, 06/07, 07/08 and 08/09 AMRs.</p>
<p>2. Have you considered how community engagement will be programmed into the preparation of the development plan document?</p>	<p>Each of the three authorities has a SCI which sets out the standards for consultations. These have formed the basis for the consultation process along with that set out in the amended regulations. The three authorities decided to undertake an initial consultation process (stage 1- topic workshops) before issuing the Issues and Options document. These stakeholder workshops were held in summer 2007 with key bodies to introduce the concept of the JCS and gather information.</p> <p>The consultation periods are timetabled in the LDS.</p> <p>See SCI and LDS.</p>
<p>3. Have you considered the appropriate bodies you should consult?</p>	<p>Chapter 6 of Broadland District Council, appendix 2 of Norwich City Council's, and appendix 3 of the South Norfolk Council's SCI lists the statutory consultees, government departments and additional bodies who should be consulted throughout the process.</p> <p>At this inception stage the SA Scoping Report was sent to all the necessary bodies (see Q6) and a list of those that attended the workshops is given in appendix 1 of the Issues and Options Report of Consultation.</p> <p>See SCI and Issues and Options Report of Consultation</p>
<p>4. Is baseline information being</p>	<p>Appendix 2 of the Sustainability Appraisal Scoping Report (which was adopted in December 2007) sets</p>

Activity	Evidence provided
<p>collected and evidence being gathered to keep the matters which affect the development of the area under review?</p>	<p>out the baseline data that was collected. This information along with data from the Annual Monitoring Reports (which provide updated information on for example housing completions) supplements the growing evidence base behind the LDF.</p> <p>The evidence studies are detailed in Appendix 2 of the Joint Core Strategy proposed submission document.</p> <p>The evidence base will need to be kept up to date and as such the SA baseline information and the evidence studies may need reviewing during the process of producing the plan.</p> <p>See SA Scoping Report and studies</p>
<p>5. Is baseline information being collected and evidence being gathered to set the framework for the sustainability appraisal?</p>	<p>The Joint Core Strategy Sustainability Appraisal Scoping Report was adopted in December 2007. It scopes relevant plans and programmes, identifies the issues that the Joint Core Strategy should address and assesses the economic, social and environmental characteristics of the area and changes in these characteristics. Appendix 2 sets out the baseline data that was collected to set the framework for the Sustainability Appraisal. It supplements the growing evidence base behind the LDF.</p> <p>See SA Scoping Report</p>
<p>6. Have you consulted the statutory environment consultation bodies for five weeks on the scope and level of detail of the environmental information to be included in the sustainability appraisal report?</p>	<p>The Scoping Report was distributed to the three statutory bodies (Natural England, English Heritage, and the Environment Agency). In addition it was sent to 23 other bodies including neighbouring authorities and Local Strategic Partnerships. A full list can be seen on page 68 of the Scoping Report. The document was available on the Internet for public viewing. The consultation took part between July 27th and August 31st 2007.</p> <p>A number of responses were received (from the three statutory consultees, the Broads Authority and Norfolk County Council), and the necessary revisions were made before the Scoping Report was adopted in December 2007. These amendments can be seen as part of the revised report and appendix 5 of the document outlines the feedback and actions arising from the consultation. The comments were taken on board before the assessment of options and when preparing the Draft SA report.</p> <p>See appendix 5 of the scoping report for comments and actions.</p>

Stage 2: Plan preparation - frontloading phase (Issues and Options, start of working up Preferred Options, Regulation 25 technical consultation)

Activity	Evidence provided
<p>1. Have you notified the specific consultation bodies that have an interest in the subject of the development plan document and invited them to make representations about its contents?</p>	<p>The Issues and Options report was sent to all statutory consultees (350 in total) taken from the GNDP consultation database at the start of the consultation process.</p> <p>The Regulation 25 (Technical Consultation) document was distributed to those set out in the document entitled Technical Consultation Regulation 25 Consultees.</p> <p>As such all specific consultation bodies set out in the regulations have been invited to make representations.</p> <p>See SCI, Issues and Options consultation report, List of Technical Consultation Regulation 25 Consultees.</p>
<p>2. Have you notified the general consultation bodies that you consider have an interest in the subject of the development plan document and invited them to make representations about its contents?</p>	<p>The Issues and Options report was sent to all statutory consultees (350 in total) taken from the GNDP consultation database at the start of the consultation process.</p> <p>The Regulation 25 (Technical Consultation) document was distributed to those set out in the document entitled Technical Consultation Regulation 25 Consultees.</p> <p>As such all general consultation bodies set out in the regulations have been invited to make representations.</p> <p>See SCI, Issues and Options consultation report, List of Technical Consultation Regulation 25 Consultees.</p>
<p>3. Are you inviting representations from people resident or carrying out business in your area about the content of the development plan document?</p>	<p>Every resident in Broadland, Norwich City and South Norfolk were invited to make representations on the Issues and Options Consultation with all residents being sent a letter and leaflet. The summary leaflet was also sent to some 3600 organisations including environment, heritage and community groups, landowners and developers, housing associations, health and social care groups, black and minority ethnic groups, utility providers and individuals who have expressed a wish to be kept informed.</p> <p>At the Regulation 25 (Technical Consultation) stage letters were sent to every household and business informing them of the consultation but outlining that it was to gather technical information. The letter</p>

Activity	Evidence provided
	contained detail of the next consultation period in which they would be invited to participate in.
4. Are you engaging with stakeholders responsible for delivery of the strategy?	<p>A range of statutory bodies, utilities and service providers, key local, district and county wide organisations and developers were invited to submit evidence and engage at the regulation 25 technical consultation stage. These stakeholders have been involved in and will continue to be involved at each stage.</p> <p>The Technical Consultation Full Report produced by Marketing Assistance contains the responses and a summary.</p> <p>Several meetings and workshops have been held with the LSPs and meetings have also been held with schools and the Third Sector Forum.</p>
5. Are you taking into account representations made?	<p>A consultation report was produced following the Issues and Options consultation which shows the results from the consultation. The comments were taken into consideration when working up the preferred options. Work carried out on the preferred options was subsequently taken forward to the regulation 25 technical consultation.</p> <p>The Technical Consultation Full Report produced by Marketing Assistance contains the responses to the consultation. These representations along with those received at the Reg 25 public consultation stage will be used to help inform the submission document.</p> <p>See consultation report produced by Marketing Assistance, Issues and Options consultation report, topic papers and policy group papers from Apr 08, Dec 08, Feb 09 & Sept 09.</p>
6. Does the consultation contribute to the development and sustainability appraisal of alternatives?	<p>The choices made for the Joint Core Strategy policy options were informed by the consultation responses and the ongoing, iterative sustainability appraisal process and its assessment outputs. SA is an iterative process and as it has been updated and audited, revisions have been placed on the website.</p> <p>Consultation (Issues and Options and Reg 25- technical consultation) influenced the strategy and fed into a re-appraisal of the SA for the Reg 25 public consultation, and a subsequent re-edit. The JCS has changed partly because of consultation and SA.</p>

Activity	Evidence provided
	<p>As the GNDD moved towards a single favoured option to take forward, sustainability appraisal continued to provide an independent review of emerging policy options. An evaluation of the three options at technical stage led to the December 2008 favoured option.</p> <p>SA is a valuable decision-making tool and has been used to check the evolution of strategies. The SA will accompany the Regulation 25 public consultation for comment.</p> <p>See consultation statements and draft preferred options report which sets out how the sustainability appraisal and public consultation were taken into consideration in the development of the options and policies.</p>
<p>7. Is the participation:</p> <ul style="list-style-type: none"> • following the principles set out in your statement of community involvement • integrating involvement with the sustainable community strategy • proportionate to the scale of issues involved in the development plan document? 	<p>A comparison of three SCIs was done in the early stages to ensure that the consultation process is in accordance with the three SCIs. A statement of compliance has been produced which covers each stage.</p> <p>The Local Strategic Partnerships for Broadland, Norwich and South Norfolk Councils were invited to comment at both the Issues and Options and the Regulation 25 stage.</p> <p>The consultation process has been proportionate to the scale of issues involved. The Issues and Options consultation commenced with a launch event and there has been continuous engagement with key stakeholders and delivery agencies through the process. The area affected by the Joint Core Strategy goes beyond the three authority boundaries. All neighbouring authorities and parishes were consulted.</p> <p>See statement of compliance with SCIs.</p>
<p>8. Are you keeping a record of:</p> <ul style="list-style-type: none"> • the individuals or bodies invited to make representations • How this was done • The main issues raised? 	<p>The consultation report for both the Issues and Options stage and Regulation 25 technical consultation records how the consultation was carried out and the main issues that were raised.</p> <p>See Consultation reports</p>
<p>9. Are you developing a framework</p>	<p>An initial table which identifies the Core Output Indicators and Local indicators was drawn up as part of</p>

Activity	Evidence provided
for monitoring the effects of the development plan document?	the Preferred Options document. This still needs to be reviewed and worked up further for the draft plan and was not consulted on as part of the technical consultation. The decision was taken that including a detailed monitoring framework in the consultation would detract from the main purpose of consultation which is to seek the public's views on emerging policy.
10. Have you arranged to send copies of documents used in consultation to the Government Office and Planning Inspectorate?	Go-East were sent a letter at each stage of the consultation. A PINS review was undertaken prior to the start of the Regulation 25 Public Consultation. The report flagged up some necessary changes which were carried out before the public consultation document was finalised.

Stage three: Plan preparation - formulation phase (Regulation 25 public consultation)

Activity	Evidence provided
<p>1. Are you preparing reasonable alternatives for evaluation during the preparation of the development plan document?</p>	<p>At the Issues and Options stage ten potential growth options were put forward (plus brownfield sites in the city & suburbs). The Sustainability Appraisal was used to select options to take forward along with other evidence such as the water cycle study, public transport modelling and discussions with children's services.</p> <p>The former preferred options document considered alternatives for growth options and area-wide policies. The alternatives were assessed and captured in the SA document and remain in it as evidence of considering reasonable alternatives.</p>
<p>2. Have you assessed alternatives against:</p> <ul style="list-style-type: none"> • consistency with national policy • general conformity with the regional spatial strategy? 	<p>At the Issues and Options stage EERA responded to say that the document does not give rise to any conformity issues and commended the three authorities for working together to produce a joint document. Go-East and EERA were consulted at both regulation 25 stages. At the technical consultation stage EERA confirmed that the strategy is in general conformity with the RSS except in areas detailed in part three of the report. These included strengthening policies such as prioritised brownfield land to the fullest extent and reducing environmental impact as well as only considering Long Stratton if alternative funding can be identified. At the Regulation 25 public consultation stage EERA responded to say that policy 5 was in general conformity with the East of England Plan.</p> <p>Go-East are members of the GNDP director's group, so are continually involved in discussions of strategy and policy development and understand reasons for GNDP's choices.</p> <p>The GNDP commissioned Planning Officers Society enterprises (POSe) to provide a review/critical friend service (Keith Nicholson) to audit the emerging JCS against procedures and national policy.</p>
<p>3. Are you having regard to:</p> <ul style="list-style-type: none"> • adjoining regional spatial strategies, the spatial 	<p>Not applicable- the area covered by the Joint Core Strategy is not in close proximity to an adjoining region.</p>

Activity	Evidence provided
<p>development strategy for London, or Welsh Spatial Plan (as appropriate)</p> <ul style="list-style-type: none"> the National Planning Framework for Scotland? 	
<p>4. Are you having regard to:</p> <ul style="list-style-type: none"> the sustainable community strategy of the authority or other authorities whose area comprises part of the area of the council any other local development documents adopted by the council? 	<p>The Sustainable Community Strategies for Broadland, Norwich and South Norfolk and the County Strategic Partnership lead the communities' own local aspirations and gave the context for this Joint Core Strategy. Page 14 of the Issues and Options Document sets out the main themes of the Sustainable Community Strategies. The Spatial Vision and Objectives topic paper and workshop along with the paper entitled "Integrating the Local Development Framework and the Sustainable Community Strategy" show the initial work which was carried out to ensure that the plan has regards to the Sustainable Community Strategies. There have been joint LSP meetings where the emerging JCS has been discussed, developed and endorsed, (especially the shared vision and planning objectives to ensure that it fits in with the Sustainable Community Strategies).</p> <p>This is the first of the Local Development Documents to be produced by each of the authorities.</p>
<p>5. Do you have regard to other matters and strategies relating to:</p> <ul style="list-style-type: none"> resources the regional development agencies' regional economic strategy the local transport plan and transport facilities and services waste strategies hazardous substances and accidents? 	<p>Resources- evidence based around Water Cycle Study, Green Infrastructure Study, Growth Infrastructure Study. With regards to minerals the county council are partners on the GNDP and as such have been involved in decision making.</p> <p>RES- EEDA has been involved in the consultation process and sit on the GNDP. Shaping Norfolk's Future is a body which is integrated with the GNDP and is a member of the director's group.</p> <p>Transport- Norfolk County Council are part of the GNDP</p> <p>Waste- Norfolk County Council are part of the GNDP</p> <p>Hazardous substances- All hazardous zones have been avoided. The JCS is not site specific with detailed locations for new homes/jobs/facilities to be developed in greater detail at a later stage. The Health and Safety Executive did not provide a response to the consultation.</p> <p>Assessment is also being undertaken to assess the likely significant effects on habitats.</p> <p>Also see SA Scoping Report.</p>

Activity	Evidence provided
<p>6. Are you having regard to the need to include policies on mitigating and adapting to climate change?</p>	<p>Climate change is a thread running through the plan. It is identified in the vision, objectives and environmental/sustainability policies. Policies on climate change have been changed and strengthened during editing following Regulation 25 consultations.</p> <p>The Environment chapter of the Issues and Options document considered climate change and reducing environmental impact. Policy 13 of the Regulation 25 Consultation addresses mitigating and adapting to climate change. EERA has identified that this policy needs strengthening further.</p> <p>Furthermore there have been various studies carried out which have helped inform this policy including:</p> <ul style="list-style-type: none"> • Greater Norwich Sustainable Energy Study • Green Infrastructure Study • Strategic Flood Risk Assessment. • Water Cycle Study <p>See Issues and Options Document, Regulation 25 consultation and studies mentioned above.</p>
<p>7. Have you undertaken the necessary sustainability appraisal of alternatives, including consultation on the sustainability appraisal report?</p>	<p>As part of the development of the 'options' in the Issues and Options consultation document the emerging policy options and suggested alternatives were appraised using the appraisal assessment matrix brought forward through the SA Scoping Report. This document was consulted upon at the same time as the Issues and Options. A summary report was also produced.</p> <p>Further Sustainability Appraisal was carried out to accompany the preferred option of the joint core strategy under the pre-June 2008 planning-making procedures. The SA was updated to incorporate the three growth options for the Norwich Policy Area, that were included in the July 2008 regulation 25 joint core strategy technical consultation under the new procedures and has since been updated to take account of, and inform the favoured options for the Joint Core Strategy. The revised SA was not published on the website in time for the public consultation so the period for comments was extended by six weeks and all consultees notified of this and that the SA is available for comments.</p> <p>The SA will be refined and finalised when the joint core strategy is published under regulation 27, before submitting it to the Secretary of State.</p>

Activity	Evidence provided
<p>8. Are you setting out clear reasons for any preferences between alternatives?</p>	<p>The choice of strategic options were political decisions and were made having considered all of the evidence and the consultation responses.</p> <p>Studies have helped gather a comprehensive evidence base of which was reported to Members and Directors to help them come to a decision for both the three options and the favoured options. The favoured option draws on the responses to these and other evidence gathered and takes account of the latest information on current and past housing supply.</p> <p>See topic papers for further explanation.</p>
<p>9. Have you taken into account any representations made on the content of the development plan document and the sustainability appraisal?</p> <p>10. Are you keeping a record?</p>	<p>Individual responses from both the technical and public regulation 25 consultations are recorded on the JDI database. GNDP responses and actions are also recorded for each representation made. The JCS incorporates changes where practicable. The recommendations from the SA are also incorporated where practicable.</p> <p>Comments received at the regulation 25 stages will be given full consideration in finalising the strategy. Individual responses will be provided for each representations and there will be an overall consultation report which will show how the representations have helped formulate the plan.</p>
<p>11. Where sites are to be identified or areas for the application of policy in the development plan document, are you preparing sufficient illustrative material to:</p> <ul style="list-style-type: none"> • enable you to amend the currently adopted proposals map • inform the community about the location of proposals? 	<p>At the regulation 25 public consultation stage, maps were produced which showed broad locations. The Joint Core Strategy mainly considers broad areas for growth and not specific sites. The strategic growth locations identified within South Norfolk are indicative and shown as areas of search whereas the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle in Broadland is the proposed Area Action Plan boundaries. Broadland District Council consulted on this Area Action Plan in parallel which provided the community with more detail of the proposal.</p>
<p>12. Are the participation arrangements compliant with the statement of community involvement?</p>	<p>The consultations were compliant with the SCI. See the statement of compliance with SCIs for further details.</p>

Activity	Evidence provided
13. Have you remained in close contact with the Government Office and discussed any emerging issues that might affect the soundness of the development plan document?	A representative from Go-East is on the directors group and policy group. A PINS review was undertaken in February 2009. This raised some issues which needed addressing before the reg 25 public consultation document was finalised.

Stage 4: Publication

Activity	Evidence provided
1. Have you prepared the sustainability appraisal report?	Yes. A pre-submission Joint Core Strategy Sustainability Appraisal Report was prepared.
2. Have you made clear where and within what period representations must be made?	Yes. Representations could be made between 2 nd November and 14 th December 2009. Details of the consultation period and where representations could be made were given on the GNDP website, Council websites, in the statement of representations procedure, the public notice and the consultation letters.
3. Have you made copies of the following available for inspection: <ul style="list-style-type: none"> • the proposed submission documents? • the statement of the representations procedure? 	Yes. The proposed submission documents and statement of representations procedures were made available for inspection at Broadland, Norwich, South Norfolk and Norfolk County council offices, the Broads Authority office, Broadland mobile information centre and all libraries and Council Information Centres in the three districts for the whole of the consultation period. The statement of representation procedure, public notices, letters sent to consultees and the website set out where and when documents could be viewed.
4. Have you published on your website the following: <ul style="list-style-type: none"> • the proposed submission documents? • the statement of the representations procedure? • statement and details of where and when documents can be inspected? 	Yes. The proposed submission documents, statement of representation procedure and details of where and when documents could be inspected were available on the GNDP website. Links were made available from the Council's websites.
5. Have you sent to each of the specific consultation bodies invited to make representations under Regulation 25(1):	The specific consultation bodies were all sent a hard copy of the statement of representation procedure and a CD containing the submission documents. Details were given as to where hard copies could be obtained from or viewed.

Activity	Evidence provided
<ul style="list-style-type: none"> • A copy of each of the proposed submission documents • The statement of the representations procedure? 	
<p>6. Have you sent to each of the general consultation bodies invited to make representations under Regulation 25(1):</p> <ul style="list-style-type: none"> • the statement of the representations procedure? • where and when the documents can be inspected? 	<p>All of the general consultation bodies were sent a letter and statement of representation procedure. Details were given as to where and when the documents could be inspected or obtained from.</p>
<p>7. Have you given notice by local advertisement setting out:</p> <ul style="list-style-type: none"> • the statement of the representations procedure • where and when the documents can be inspected? 	<p>Public notices were placed in the following newspapers on the following dates:</p> <p>Eastern Daily Press - 2 Nov Evening News - 2 Nov Diss Mercury - 6 Nov Great Yarmouth Mercury - 6 Nov Beccles & Bungay Journal - 6 Nov The Lowestoft Journal - 6 Nov North Norfolk News - 5 Nov Norwich Advertiser - 6 Nov Wymondham and Attleborough Mercury - 5 Nov</p> <p>The public notice set out the statement of representation procedure and details of where and when the documents could be inspected.</p>
<p>8. Have you requested the opinion of the regional planning body the general conformity of the</p>	<p>A letter was sent to EERA on 30th October 2009 requesting their opinion on the conformity of the JCS with the East of England Plan. EERA responded on 11th December to confirm that the plan is in general</p>

Activity	Evidence provided
development plan document with the regional spatial strategy?	conformity with the East of England Plan.

Stage five: Submission

Question	Evidence provided
<p>1 Are you ready to submit the DPD?</p> <p>2 Are there any major issues revealed by the representations on publication?</p> <p>3 Are all the relevant documents in place?</p>	<p>Yes, the DPD is ready for submission, with Broadland, Norwich and South Norfolk councils giving approval for submission on the 25 February, 2 March and 22 February respectively. Norfolk County Council, under delegated powers, has written to support the submission of the Joint Core Strategy.</p> <p>The representations on publication did not reveal any issues that were not known prior to publication. A schedule of the major challenges is attached as a response to q25</p> <p>Copies of all documents prescribed in regulation 30(1) are in place and will be available at the deposit points (head offices of Broadland District Council, Norwich City Council, South Norfolk District Council and Norfolk County Council). All documents can be viewed on the website and documents will be made available from all public libraries and council information centres within the GNDP area.</p>
<p>4 Has the development plan document been prepared in accordance with the local development scheme?</p> <p>5 Does the development plan document's listing and description in the local development scheme match the document?</p> <p>6 Have the timescales set out in the local development scheme been met?</p>	<p>The Joint Core Strategy is consistent with the proposed purpose of the document as set on each of the authorities LDS. The purpose is to provide the strategic vision, objectives and strategy for future development of the Broadland, Norwich and South Norfolk in accordance with the Regional Spatial Strategy and to coordinate policies between the three district authorities.</p> <p>The timetable has been delayed from the original set out in the LDS due to changes in the regulations in 2008. The most recent timetable as set out in each of the three authorities 08/09 AMRs, timetables submission for February 2010 and adoption for December 2010.</p>
<p>7 Has the development plan document had regard to any</p>	<p>Yes. The Sustainable Community Strategies for Broadland, Norwich, South Norfolk and Norfolk County lead the communities' own aspirations and provided a context for the Joint Core Strategy. It also</p>

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Question	Evidence provided
sustainable community strategy for its area (like a county and district)?	helped inform the Sustainability Appraisal. The three Local Strategic Partnerships and the County Strategic Partnership provided guidance and direction throughout the process and were kept engaged through formal reports and briefing. The discussions have ensured that the Joint Core Strategy is aligned with the Sustainable Community Strategies.
8 Is the development plan document in compliance with the statement of community involvement (where one exists)? 9 Has the council carried out consultation as described in the statement of community involvement?	Yes, although due to changes in the regulations in 2008, from the submission stage the JCS complies with the revised requirements of PPS12, which supersede the SCI. The JCS followed the stages set out in the SCI for information gathering and pre-submission consultation (Issues and Options, Regulation 25). The submission consultation on soundness and subsequent stages are in line with the revised requirements of PPS12 and The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. The consultation process has followed the requirements set out in the SCI for informing, participating and consulting. See the Statement of Compliance for further details.
10 Has the development plan document been subject to sustainability appraisal? 11 Has the council provided a final report of the findings of the appraisal?	<p>Sustainability Appraisal has been integral in the preparation of the Joint Core Strategy and a final report of the findings has been produced. Scoping of documents and evidence collected in the early stages of the SA informed the Issues and Options stage.</p> <p>All policy and growth distribution options have been subject to SA. This process helped assess the possible environmental, economic and social impacts and helped work up the policy and .growth distribution. The strategy is a sustainable approach which takes into consideration the evidence base and consultation responses as well as the sustainability appraisal.</p> <p>SA indicators, along with AMR indicators, will be used to monitor the progress of the plan. The primary indicators to be monitored are set out in appendix 8 of the proposed submission document.</p>
12 Is the development plan document to be submitted consistent with national policy?	The plan is generally consistent with national policy.
13 Does the development plan	All policies and proposals comply with RSS requirements. In particular it implements and expands

Question	Evidence provided
<p>document contain any policies or proposals that are not in general conformity with the regional spatial strategy?</p> <p>14 If yes, is there local justification?</p> <p>15 Has the council got confirmation from the regional planning body about the general conformity of the plan with the regional spatial strategy?</p>	<p>upon the RSS locally by</p> <ol style="list-style-type: none"> a. setting out the areas for major growth focusing around Norwich, b. promoting more sustainable means of transport c. addressing deprivation d. promoting Norwich as a retail, employment, leisure, cultural city e. interpreting the lower level of the settlement hierarchy for rural areas f. clarifying strategic employment locations g. building on affordable housing, environment, renewable energy and water policies. <p>EERA have provided confirmation that the plan is in conformity with the East of England Plan.</p>
<p>16 Does the development plan document comply with the 2004 regulations (as amended)?</p> <p>17 Specifically, has the council published the prescribed documents, and made them available at their principal offices and their website?</p> <p>18 Has the council placed local advertisements?</p> <p>19 Has the council notified the development plan document bodies?</p> <p>20 Does the development plan document contain a list of superseded saved policies?</p>	<p>16 Yes, the JCS complies with the 2004 regulations (as amended).</p> <p>17 Still to do (to be completed on 8 March 2010).</p> <p>18 Still to do (to be published in various newspapers week commencing 8 March 2010).</p> <p>19 Still to do (to be notified week commencing 8 March 2010).</p> <p>20 Yes, appendix 3 of the proposed submission JCS lists the superseded policies and changes to the local plan proposals map for Broadland, Norwich and South Norfolk.</p>
<p>21 Are there any policies applying to sites or areas by reference to</p>	<p>Revisions to the proposals map have been made and were available to view on the GNDP website during the regulation 27 consultation. The submission proposals map will be submitted with the Joint</p>

Question	Evidence provided
<p>an Ordnance Survey map or to amend an adopted proposals map?</p> <p>22 If yes, have you prepared a submission proposals map?</p>	<p>Core Strategy.</p>
<p>23 If the development plan document is not a core strategy, is it in conformity with the core strategy?</p>	<p>N/A</p>
<p>24. Have you prepared a statement setting out:</p> <ul style="list-style-type: none"> • Which bodies and persons were invited to make representations under Regulation 25 • How they were invited • A summary of the main issues raised • How the representations have been taken into account? 	<p>A report of the Issues and Options consultation was produced which contained details of who were invited to make representation, how they were invited, the main issues raised and the councils response. A similar report was prepared for the Regulation 25 consultation (technical and public) with the addition of a summary of issues raised document for each stage.</p>
<p>25. Have you prepared a statement giving:</p> <ul style="list-style-type: none"> • the number of representations made under Regulation 28(2) • a summary of the main issues raised <p>OR</p>	<p>Yes, a statement has been prepared.</p>

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Question	Evidence provided
<ul style="list-style-type: none"> that no representations were made? 	
26. Have you collected together all the representations made under Regulation 28?	Yes, all representations made under regulation 28 have been collected together.
27 Have you assembled the relevant supporting documents?	Yes, all the relevant supporting documents have been assembled, both electronically and in paper format.
28 Has your council approved the development plan document for submission?	Yes, the plan was approved for submission by Broadland, Norwich and South Norfolk councils on the 25 February, 2 March and 22 February respectively. Norfolk County Council, under delegated powers, has written to support the submission of the Joint Core Strategy.
29 Have you sent the Secretary of State (the Planning Inspectorate) a paper copy of the following: <ul style="list-style-type: none"> the development plan document? the submission proposals map (unless there are no site allocation policies)? the documents prescribed in Regulation 30(1)? 	Still to do (to be sent on 5 March 2010).
30 Have you sent the Secretary of State (the Planning Inspectorate) an electronic copy of the: <ul style="list-style-type: none"> development plan document? submission proposals map 	Still to do (to be sent on 5 March 2010).

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Question	Evidence provided
<p>(unless there are no site allocation policies)?</p> <ul style="list-style-type: none"> documents prescribed in Regulation 30(1)? 	
<p>31. Have you made the following available at the same places where the proposed submission documents were to be seen:</p> <ul style="list-style-type: none"> The development plan document? The documents prescribed in Regulation 30(1)? 	<p>Still to do (to be made available from 8 March 2010).</p>
<p>32 On your website, have you published the:</p> <ul style="list-style-type: none"> development plan document submission proposals map sustainability appraisal report Regulation 30(1)(d) statement Regulation 30(1)(e) statement supporting documents (where practicable) representations made under Regulation 28 (where practicable) statement as to where and when the development plan document 	<p>Still to do (to be published on 5 March 2010).</p>

Question	Evidence provided
and the documents are available?	
<p>33 For each specific consultation body invited to make representations under Regulation 25(1), have you sent the:</p> <ul style="list-style-type: none"> • development plan document • submission proposals map • sustainability appraisal report • adopted statement of community involvement • Regulation 30(1)(d) statement • Regulation 30(1)(e) statement • supporting documents you consider relevant to each body • statement as to where and when the development plan document and the documents are available? 	Still to do (letters to be sent 8 March 2010).
<p>34 For each general consultation body invited to make representations under Regulation 25(1), have you sent:</p> <ul style="list-style-type: none"> • notification that the documents prescribed in Regulation 30(1) are available for inspection 	Still to do (letters to be sent 8 March 2010).

Question	Evidence provided
<ul style="list-style-type: none"> • where and when they can be inspected? 	
<p>35 Have you given notice by local advertisement setting out:</p> <ul style="list-style-type: none"> • the title of the development plan document? • the subject and area covered by the development plan document? • notification that the documents prescribed in Regulation 30(1) are available for inspection • where and when they can be inspected? 	<p>Still to do (to be placed in various newspapers, week commencing 8 March 2010).</p>
<p>36 Have you given notice to persons who have requested to be notified that submission has taken place?</p>	<p>Still to do (letters to be sent 8 March 2010).</p>
<p>37 If an examination is being held, at least six weeks before its opening has the Programme Officer:</p> <ul style="list-style-type: none"> • published the time and place of the examination and the name of the person appointed to carry out the examination on your website 	<p>Still to do</p>

Question	Evidence provided
<ul style="list-style-type: none">• notified those who have made representations on the published development plan document which have not been withdrawn of these details• advertised these details?	

Appendix 2- Soundness

Key question	Evidence provided
Justified	
Participation	
1. Has the consultation process allowed for effective engagement of all interested parties?	<p>Yes, the consultation process has followed the requirements of PPS12 and the regulations (as amended) and the three SCIs and has been proportionate to the scale of issues involved. However a number of policies have been significantly revised since the Regulation 25 public consultation in light of new evidence and responses from the consultation. These include policies on climate change, the environment, good design, energy conservation and the protection of local distinctiveness as well as a review on the settlement hierarchy and the revision of the implementation policy.</p> <p>For further detail see consultation statements and SCI compliance statement.</p>
Research/ fact finding	
2. Is the content of the development plan document justified by the evidence? 3. What is the source of the evidence? 4. How up to date and convincing is it?	<p>A number of evidence studies have been undertaken and these determine the major infrastructure and sustainability needs facing the area over the planned growth period. These studies are detailed in Appendix 2 of the Joint Core Strategy for Broadland, Norwich and South Norfolk: Proposed Submission document.</p> <p>The report to the GNDP Joint LDF Group (21 April 2008) sets out what the evidence told us about each topic area. The draft SA report of reg 25 (23 April 2009) sets out the main conclusion for the options appraised and the proposed policies.</p> <p>It was important to test out various approaches and look at a range of locations and combinations of places. Options have been consistent for Norwich (urban focus in all options) and North east in Broadland (in all options). This was the only location that performed well compared with the evidence and the SA. In South Norfolk the choice of locations and scales of growth has been subject to considerable public debate which has led to changes. The choice of the growth strategy is explained in a topic paper.</p>

Key question	Evidence provided
	<p>The strategy draws on the responses to the technical consultation and other evidence gathered and takes account of the latest information on current and past housing supply. The spatial distribution of growth is not the optimal option suggested by the technical evidence or the sustainability appraisal but it is the strategic preference of the GNDP. It is pragmatic and reasonable and is a compromise in response to public comment.</p>
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<p>There were few assumptions because of the wide evidence base and clearly expressed public aspirations (through SCSs). There is a comprehensive evidence base but the evidence itself is based on assumptions that will be tested through implementation and monitoring.</p> <p>The Greater Norwich Infrastructure & Funding Study: Key Assumptions Paper (March 2009) sets out the key assumptions about how the impact of growth on the various elements of infrastructure should be modelled in order to determine the infrastructure required.</p> <p>Other assumptions include:</p> <ul style="list-style-type: none"> • Rates of development which can be achieved on major developments • Market conditions relating to residential, commercial and retail development (affects rates of delivery, potential development contributions, on-site delivery of green infrastructure, delivery of affordable housing, suitability and deliverability of existing employment allocations, scale of new retail development, prospects for mixed uses, Long Stratton bypass. • Prospect of HCA support • Future economic performance of the local economy • Future funding of utilities through asset management plans • Future funding for major transport infrastructure through regional funding allocations prioritisations and Local Transport Plan • Network rail and regulations governing the use of rail who will allow the mixed running of the heavy rail and tram trains to serve Rackheath • Availability of future mainstream funding for other infrastructure including schools, adult social services, health care

Key question	Evidence provided
	<ul style="list-style-type: none"> • Outcome of Environment Agency's review of consents • The introduction of a Community Infrastructure Levy. <p>Scott Wilson in their audit of the Issues and Options SA identified that many assumptions were made during the SA process about how the option would be implemented and picked up on the fact that many of the assumptions made are not clear. They stated that the 'assumptions should be made more explicit than is currently the case'.</p>
Alternatives	
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>The strategy for growth is appropriate given the reasonable alternatives and takes account of both the evidence base and local political views.</p> <p>The Issues and Options stage considered various growth location options. The draft preferred options report (GNDP Joint LDF Group 21/04/08) sets out reasons for rejecting options along with results from the evidence studies and issues and options consultation. The subsequent Regulation 25 (technical consultation) stage considered three reasonable alternatives and SA was undertaken. These were also included in the appendices at the Regulation 25 (public consultation) stage, for further comment.</p> <p>The favoured option differs from other options and needed to reflect updated housing completion figures, political views and technical views. Because the JCS crosses local authority boundaries, the GNDP needed to reach consensus on the JCS strategy and major reports were taken to the GNDP policy group in December 2008, February 2009 and September 2009 which drew members' attention to the significant evidence base to inform their decisions.</p> <p>The consultation reports, minutes from meetings from the GNDP policy group and the topic papers identify how and why decisions were made.</p>
<p>10. Does the sustainability appraisal show how the different options perform and</p>	<p>Yes. SA has informed the plan making process from the earliest stage, with the collection of baseline information and the scoping of relevant strategies and plans informing the content of the Issues and Options document.</p>

Key question	Evidence provided
<p>is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<p>As part of the development of the 'options' in the Issues and Options consultation document the emerging policy options and suggested alternatives were appraised using the appraisal assessment matrix brought forward through the SA Scoping Report. The 11 growth areas were also subject to SA. This document was consulted upon at the same time as the Issues and Options. A summary report was also produced.</p> <p>Further Sustainability Appraisal was carried out to accompany the preferred option of the joint core strategy under the pre-June 2008 planning-making procedures; however all significant progress was halted by a change in the regulations.</p> <p>The SA was updated to incorporated the three growth options for the Norwich Policy Area, that were included in the July 2008 regulation 25 joint core strategy technical consultation under the new procedures. The SA informed the combination of places and the best performing options. The reasonable alternatives were also subject to SA which were generally based on the best locations in the first place.</p> <p>A further updated was carried out to take account of, and inform a single favoured option for the joint core strategy. The regulation 25 public consultation was extended so people could comment on the SA as part of their representations. The SA was refined, finalised and published under regulation 27.</p>
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<p>Yes. The Joint Core Strategy implements and expands upon the RSS locally by</p> <ol style="list-style-type: none"> a. setting out the areas for major growth focusing around Norwich, b. promoting more sustainable means of transport c. addressing deprivation d. promoting Norwich as a retail, employment, leisure, cultural city e. interpreting the lower level of the settlement hierarchy for rural areas f. clarifying strategic employment locations g. building on affordable housing, environment, renewable energy and water policies. <p>EERA has confirmed that the proposed strategy is in general conformity with the RSS.</p>

Effective	
Deliverable	
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<p>The spatial vision and objectives clearly identify what issues the Joint Core Strategy is seeking to address and paragraph 5.3 of the reg 25 public consultation document sets out the common themes with the sustainable community strategy. An exercise was also carried out in the initial stages of plan preparation which links the four community strategies and their visions with the joint spatial planning objectives. The PINS review (Jan/Feb 2009) recommended that greater cross-referencing was made to the relationship between the SCS and the JCS in the final form of the JCS. As such the introduction was revised to draw more attention to the SCSs and clearer reference was made between the policies are the plan objectives. Each section of the public consultation document contained a reasoned justification for the policy and this includes detail on the issues that the policies address.</p> <p>Section 10 of the Sustainability Appraisal Scoping Report identifies the sustainability issues to be considered when producing the Local Development Framework for the Greater Norwich area.</p> <p>Nine issues workshops were held in the Greater Norwich area to help inform the production of the Issues and Options report. Each workshop dealt with a different theme (See copies of workshop topic papers). The Issues and Options Report on Consultation sets out the main issues raised by the community at both the workshop stage and Issues and Options stage.</p> <p>In summary, the objectives were clear in the topic papers, issues and options document and the Sustainable Community Strategy (SCS). The SCS contains the priorities for the area and through consultation with the Local Strategic Partnerships and discussion with Members it has been confirmed that all the priorities set out in the plan have equal importance.</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so,</p>	<p>The decision was taken to produce a Joint Core Strategy to address many of the cross-boundary issues. All neighbouring authorities have been consulted on the document and the Sustainability Appraisal. Furthermore Norfolk County Council forms part of the Greater Norwich Development</p>

<p>have they been adequately addressed?</p>	<p>Partnership.</p> <p>Cross boundary issues addressed include Wroxham/ Hoverton, Beccles/Bungay, A11 dualling. Other cross cutting issues are examined by the Water Cycle Study and the Appropriate Assessment.</p>
<p>16. Does the development plan document contain clear objectives?</p>	<p>Yes. The Joint Core Strategy contains clear objectives which have derived from the Sustainable Community Strategies and the vision. They have evolved over time following SA and consultation and can be identified in the topic papers, Issues and Options document, Preferred Options reports and both stages of the regulation 25 consultations.</p>
<p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<p>Yes. The objectives are specific to the area.</p> <p>The vision and objectives show how the spatial planning elements of the Sustainable Community Strategies can be achieved.</p>
<p>19. Is it clear how the policies will meet the objectives?</p> <p>20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p>	<p>There are clear links between the Sustainable Community Strategies and the objectives and each policy sets out which objectives it meets. The monitoring framework shows how Local Area Agreement (LAA) targets (and other targets) will be monitored.</p> <p>There are no obvious gaps in the policies with regard to the objectives.</p>
<p>21. Are there realistic timescales related to the objectives?</p>	<p>Appendix 7 of the Joint Core Strategy contains the implementation framework which sets out the scheme, delivery body, estimated cost, funding source, which strategic site it is critical to and the estimated delivery date. The table is drawn from the Growth Infrastructure Needs and Funding Study – August 2009.</p> <p>The LSPs and service providers have been engaged in the preparation of the strategy (and studies).</p>

	Commitment will be sought from these bodies through the Integrated Development Programme. Work on this is currently ongoing.
22. Are the policies internally consistent?	Policies are internally consistent with the strategy seeking a balance between economic development and the environment. The delivery of infrastructure is a key requirement; however the favoured option is not the lowest cost strategy.
23. Does the development plan document contain material which: <ul style="list-style-type: none"> • is already in another plan • should be logically be in a different plan • should not be in a plan at all? 	<p>The Joint Core Strategy does not contain material which is in another plan. It follows national guidance and the Regional Spatial Strategy.</p> <p>The JCS identifies broad locations for growth and in the case of the north east area, identifies a strategic allocation. It does not contain information which should be in the site allocations plan. The vision, objectives and policies within the Joint Core Strategy build on national and regional guidance and sets out the broad strategy for the area; they do not set out criteria based policies against which the majority of planning applications will be assessed.</p>
24. Does the development plan document explain how its key policy objectives will be achieved?	<p>Appendix 7 of the Joint Core Strategy contains the implementation framework which sets out the scheme, delivery body, estimated cost, funding source, which strategic site it is critical to and the estimated delivery date. The table is drawn from the Growth Infrastructure Needs and Funding Study – August 2009.</p> <p>Commitment will be sought from these bodies through the Integrated Development Programme. Work on this is currently ongoing.</p>
25. If there are development management policies, are they supportive of the strategy and objectives?	This document does not contain Development Management policies.
26. Have the infrastructure	The Norwich Growth Area- Infrastructure Need and Funding Study (2007) identified the infrastructure

<p>implications of the strategy/policies clearly been identified?</p>	<p>requirements for 33,000 additional dwellings within the Norwich Policy Area. It was based on two hypothetical growth options.</p> <p>The Growth Infrastructure Needs and Funding Study (2009) assess the infrastructure requirements, based on up to date information and the agreed key assumptions. This is reflected in the implementation framework.</p> <p>The risk log identifies the risks associated with this strategy. The delivery of the JCS is dependent on a wide range of infrastructure and is an expensive option.</p>
<p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<p>The delivery mechanism for co-ordination, prioritisation and management, including contributions and funds, is the Greater Norwich Development Partnership (GNDP). The GNDP will develop and manage a delivery programme supporting the implementation of this Strategy. The programme will be developed and managed through the Integrated Development Programme (IDP). The key elements of the programme are set out in the draft Implementation Framework in appendix 7 of the JCS.</p>
<p>28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p>	<p>The implementation framework identifies delivery bodies for each scheme and the estimated delivery date. It will be expanded on further in the IDP. There are some areas where further detailed work needs to be undertaken and the timetable for funding is not in alignment with the preparation of the Joint Core Strategy.</p>
<p>29. Is it clear who is intended to implement each part of the strategy/ development plan document?</p> <p>30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<p>Appendix 7 of the JCS contains the implementation framework which sets out the scheme, delivery body, estimated cost, funding source, which strategic site it is critical to and the estimated delivery date. The table is drawn from the Growth Infrastructure Needs and Funding Study (2009).</p> <p>Service providers have been engaged in the production of the plan; however commitment has still to be sought on delivery. This will be done through the Integrated Development Programme. Work on this is currently ongoing.</p>

<p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?</p>	<p>Yes- the vision describes what sort of area we are aiming for in the future and shows how the spatial planning elements of the Sustainable Community Strategy can be achieved. The JCS contains detail about development and change in the area, it sets out broad locations for growth but also addresses wider issues such as promoting healthier lifestyles and facilitating job growth and training opportunities.</p> <p>There was a large dialogue with LSPs and service providers (including Children’s Services- education and social services).</p>
<p>33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council’s views about the matter?</p>	<p>There are few of these. Local Government Reorganisation has affected discussions about delivery arrangements. There are a few other external constraints, including the housing share of the NPA although there is the ability to redistribute growth if locations are delayed.</p>
<p>Flexible</p>	
<p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<p>It is accepted that there remains some uncertainty over the provision of major infrastructure. However this is to be expected as major growth relies on infrastructure. 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.</p> <p>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</p>

	<p>applications and allocations to deal with delays elsewhere. Phasing will be driven by the delivery of enabling infrastructure.</p> <p>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.</p> <p>Key assumptions are set out in the Greater Norwich Infrastructure & Funding Study: Key assumptions Paper (Appendix B of the study).</p> <p>The monitoring framework in appendix 8 of the JCS includes performance indicators and targets to assess how the strategy’s objectives are being met which will be reported through the Annual Monitoring Report. The outcome will inform the need for reviews of the IDP, the Joint Core Strategy and other Local Development Documents.</p>
<p>35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional spatial strategy?</p>	<p>Over 10% of growth is not tied to a major growth location. There is an over allocation of homes in the plan. The North East area could rise to 10,000 (+3,000) post 2026.</p>
<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are</p>	<p>No. The plan will be reviewed in the event of a critical shortfall for infrastructure provision.</p>

failing?	
Monitoring	
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?	See appendix 6, 7 and 8 of the JCS document for housing trajectory, implementation and monitoring frameworks.
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	The monitoring framework sets out the indicator, agencies, target and source. The indicators will be reported through the Annual Monitoring Reports for Broadland, Norwich and South Norfolk.
39. Are suitable targets and indicators present (by when, how and by whom)?	The monitoring framework sets out the indicators, agencies, target and source.
National policy	
40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy? 41. If yes, is there a local justification?	The plan is generally consistent with national policies and EERA have confirmed that the plan is consistent with the Regional Spatial Strategy.

42. Does the development plan document contain policies that do not add anything to existing national guidance?
43. If so, why have they been included?

No. The plan follows national guidance and applies it locally.