

Examination into the Joint Core Strategy for Broadland, Norwich and South Norfolk produced by the Greater Norwich Development Partnership

MATTERS & KEY QUESTIONS FOR EXAMINATION AT THE HEARINGS

Response from CPRE Norfolk

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

(A) Legal requirements

1. **A1** The Local Development Schemes (LDS) have been shown on the individual web sites with a focus on the how it relates to the individual Council. There have been differing degrees of level of information and updating/revisions. There has been no LDS for the GNDP as a whole, and it has been difficult to track the overall activity and changes in timescales for the progression of the DPDs.
2. **A2** The JCS has been prepared using the processes in the Statements of Community Involvement; but the start point has been the EEP housing numbers and distribution by District, and within this the options have been constrained, and have allowed little opportunity for public engagement in a meaningful way.
3. **A3** No comment
4. **A4** The Sustainability Appraisal and Appropriate Assessment have been undertaken. But that for a eco-town at Rackheath appeared to take as a baseline that the NDR (three quarter route) had already been built. In the case of the AA, on water resource and treatment the Environment Agency advice is that this is not sufficient, and the implications of the Water Framework Directive need also to be taken into account.
5. **A5** The GNDP JCS framework appears to be the start point for the sustainability community strategies, not the individual Councils.

6. [The revocation of the Regional Spatial Strategy lapsed with the revocation of the East of England Plan. The advice states that: *'Local Planning Authorities will be responsible for establishing the right level of local housing provision for their area and identifying a long term supply of housing land without the burden of regional housing targets....It is important for the planning process to be transparent and for people to be able to understand why decisions have been taken. Local authorities should continue to collect and use reliable information to justify the housing supply policies and defend them during the LDF examination process.'*]

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

7. **B1** The fixed start point of the JCS process as far as the public are concerned has been, and remains, the RSS housing provision targets and the distribution of these to each Local Authority. The spatial strategy has been progressed on the basis of a very long wish list of infrastructure requirements being implemented. In the changed economic outlook, it is even clearer that the strategy has not been justified, and is not sound. The discussions and decisions of the GNDP Policy Group have not been in the public domain. CPRE consider that an evaluation of the Matters put by the Inspectors leads to the conclusion that this JCS process be abandoned, and a fresh start made taking account of the above Government advice.
8. **B2** There was some perfunctory identification and consultations on 'reasonable alternatives' for the spatial strategy at the Issues and Options first stage. However, this quickly set into a fixed framework of two different approaches for the north east and south west growth locations; concentration into a new settlement in the north east, and dispersal around existing settlements in the south west. From then on, far from being a clear audit trail demonstrating the decision-making process by which the vision and objectives were derived, they were lost in a fog of secrecy in the Policy Group of the GNDP, the membership of which even was not made clear until late in the day.
9. **CPRE Norfolk have given input to the Joint Core Strategy consultation process at every stage and have a keen interest in its outcome, given our objective of protecting and enhancing the environment. As such, we would like a seat at the table for this matter.**