

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

1. We feel that the concept is well explained and cross-referenced within the JCS, and we especially welcome the inclusion of GI maps to provide a graphic illustration of the area's opportunities. We are particularly concerned to emphasise the important role of green infrastructure in mitigating harm to European designated sites which are threatened, e.g. SPA bird populations at risk from increased disturbance; vegetated shingle SAC habitats at risk from increased trampling – both associated with a growing population and an increase in visitor numbers to designated sites (there has been research showing that most people visiting these sites do so from within Norfolk, with a significant proportion from the Greater Norwich area). The Greater Norwich Green Infrastructure Strategy and subsequent Delivery Plan is focussed on providing new green assets for a growing population, but it is also important (and legally necessary) to protect existing assets. Future DPDs will need to define asset boundaries and identify future long-term management in order to provide the required certainty over delivery. There is not enough detail in the JCS at present to give that assurance.

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

1. On water supply, Natural England, the Environment Agency and Anglian Water Services are currently working on a joint position statement on this issue (see our detailed comments on Matter 3), which will be finalised before the Examination in Public hearings in November. The question of investment must ultimately be answered by Ofwat, through its commitment to Anglian Water Services' asset management planning process. In terms of developers contributions to infrastructure investment, it will be crucial for consortia of developers to work together to guarantee the provisioning of strategic services in high density growth areas. A shortfall in the required investment will obviously effect the GNDP's ability to deliver development in selected locations within the constraints of Policy 3.
2. We recognise the constraints on sewerage and waste water treatment provision identified by Anglian Water in their October 2010 position statement. We advocate a precautionary approach to remedying the situation at Reepham, where impacts on water quality in the River Wensum SAC will be a limiting factor to future growth. It is clear there is presently no capacity at Reepham WwTW to accommodate further growth without an adverse impact on the River Wensum, and therefore this housing allocation must be considered unsound. Elsewhere, there are clearly additional uncertainties over the capacity and future investment required for the sewerage network, and this will again be dependent on the appropriate phasing of development and the interdependence of developer contributions.