

Helen Ward  
Natural England  
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19/11/2010

Dear Helen,

Thank you for your letter dated 12 October 2010, concerning the Habitats Regulations Assessment (HRA) of the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk.

We are pleased to see that you have confirmed that the HRA of the JCS has been completed as required. Thank you also for confirming your support for policies 1 and 3 of the Joint Core Strategy, which require developments to address water and green infrastructure needs to meet the requirements of the HRA.

Your letter states that you could only concur with the conclusion of the HRA concerning mitigation if water and green infrastructure are implemented with development. Therefore the rest of this response shows how water and green infrastructure will be implemented, taking account of the fact that as the JCS is a strategic document, the exact nature of mitigation cannot be known at this stage.

In relation to water infrastructure, the GNPD is happy to have been able to work with yourselves, the Environment Agency and Anglian Water to ensure that, through the Water Cycle Study and subsequent work, the strategic challenges related to water have been extensively investigated.

As you are aware, Anglian Water is legally required to ensure that all relevant infrastructure is put in place to serve development as it takes place, whilst also ensuring that the requirements of the HRA are addressed. Anglian Water has committed to doing so, stating that definitive infrastructure solutions cannot be identified until specific sites are identified for development.

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The GNDP is happy to continue to engage on water issues, to ensure that the positive relationships built up between the organisations will continue as sites are developed.

In relation to green infrastructure, your concerns relate to increased visitor pressure on protected habitats arising from growth in the area.

The GNDP is pleased to confirm that it is confident that the areas over which it has control have been addressed. A detailed evidence base has been provided through the Green Infrastructure Study and the Green Infrastructure Delivery Plan. The GNDP is also pleased to confirm that work has been commissioned looking at the potential effects of visitors on protected sites, to identify those sites which should be protected from additional visitor numbers.

The detailed evidence base has firstly informed the policy requirements of the JCS and secondly the implementation of the strategy through the Local Investment Plan and Programme (LIPP) and the Green infrastructure Delivery Group.

As Natural England is a member of the Green infrastructure Delivery Group, you will be aware that varied and significant green infrastructure projects, such as further improvements at Whitlingham Country Park, heathland creation at Mousehold and the launching of the Wensum River Parkway, are already being delivered. You will also be aware that the LIPP identifies the need for further green infrastructure projects.

Bringing forward of future projects, using the methodology set out in the Green Infrastructure Delivery Plan to cover the wide variety of benefits from green infrastructure, is ongoing through the Green Infrastructure Delivery Group. Proposed projects include both the enhancement of existing areas of less sensitive green infrastructure to make them more accessible to the public and the creation of new green infrastructure on arable land.

This work will be funded by local authorities and development contributions, chiefly through the LIPP. The GNDP will develop a charging schedule for the developer contributions, including recommending that a proportion of the money should be spent on green infrastructure projects. At this stage, it is not possible to identify exactly what that proportion will be, as this will be a decision to be made by members. However, the LIPP sets out the importance of green infrastructure and the need for funding is included in the priority 2 infrastructure tables.

Implementation of the Green Infrastructure Delivery Plan also creates the opportunity to co-ordinate delivery with work being done by partners. Natural England can therefore play a key role in co-ordinating infrastructure delivered through the JCS with other landscape improvement initiatives such as the High Level Stewardship scheme. We are grateful for the contributions made in this way so far and are keen to continue partnership working.

Effective management of protected habitats by landowners will also play an important role ensuring that visitor pressures do not have a negative impact on the protected sites. Natural England will no doubt also play a key role in the advising on the management of protected habitats.

Therefore Natural England have a key role in shaping and delivering green infrastructure HRA mitigation measures over the life of the JCS. Given we cannot be more certain of the schemes of mitigation at this time, but Natural England are part of the process for determining it, we are fully confident that appropriate and effective proposals will be brought forward in a timely fashion.

Whilst we appreciate that you would prefer the certainty of the schemes of mitigation, in this case the certainty flows from Natural England being part of the decision making process that delivers the schemes of mitigation and in giving advice on management.

I look forward to your views on this position.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mike Burrell', written in a cursive style.

Mike Burrell (on behalf of the GNDP)  
Planning Policy Team Leader  
Norwich City Council

cc.

Mr Mike Fox

Mr Roy Foster

Ms Sue Bull, Anglian Water

Ms Andrea Long, Broads Authority

Mr Stuart Rickards, Environment Agency