

Date: 26 November 2010
Our ref: S/Policy/GNDP/JCS HRA

Mike Burrell
Greater Norwich Development Partnership
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SENT VIA EMAIL ONLY



Norfolk & Suffolk
Government Team
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Dear Mike

Habitats Regulations Assessment of the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk

Thank you for your response to our letter of 12 October 2010, received in this office on Monday 22 November 2010. We appreciate your finding the time to deal with our concerns, especially given your current commitments at the Examination in Public hearings. You will be aware, from our representations at the hearings, that we remain concerned about the deliverability of certain items of essential infrastructure required as mitigation for the GNDP's own Habitats Regulations Assessment of the Joint Core Strategy. This mitigation is a statutory requirement as '*the competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site*' Reg 61 (5), and this conclusion can only be reached if mitigation is in place.

In terms of the water infrastructure issues, you will be aware that Natural England (NE), the Environment Agency (EA) and Anglian Water Services (AWS) have recently signed up to a statement of common ground regarding water supply constraints at the Costessey abstraction point, and adverse impacts on the River Wensum Special Area of Conservation. This has addressed our short-term concerns that no abstraction above historic levels will take place up till 2015, by which time we expect AWS to have identified a solution to the Review of Consents' constraints. In the short-term, we have also advised AWS that they may need to have recourse to 'logging up' as a contribution towards the 20 m/l day reduction required by RoC up to 2015. AWS have undertaken to include measures for providing the requisite infrastructure through the next round of asset management planning (AMP6), during which period they will need to address the sustainability reduction requirement (an additional 29 m/l day) to restore low flows in the Wensum as well as servicing any new growth in greater Norwich. As guaranteed by Policy 3 of the JCS, no further development can be permitted post-2015 until the statutory obligation to the Wensum is discharged:

The release of land for development will be dependent on there being sufficient water infrastructure to meet the additional requirements arising from the new development and to ensure that water quality is protected or improved, with **no significant detriment to areas of environmental importance.**

On green infrastructure, we are pleased to note that the GNDP has commissioned work to look specifically at the effects of visitor pressure on protected sites, which was identified as an evidential shortfall at the EiP hearings. This will help to target the location and scale of appropriate recreational greenspace to draw visitors away from some vulnerable sites. We believe that the charging schedule for developer contributions should not just *recommend* that a proportion of the money be spent on green infrastructure projects, but *require* it, as the 'no adverse effect' findings of the HRA are dependent upon it. As we stated at the hearings, we believe that certain elements of the green infrastructure should be explicitly identified as Priority 1 in the LIPP.

Natural England welcomes the opportunity to remain actively involved in green infrastructure planning and delivery for Greater Norwich, and we hope to maintain a productive dialogue with the GNDP over the criticality of green infrastructure to deliver the necessary mitigation for the adverse effects of the Joint Core Strategy's growth proposals.

In conclusion, we would take this further opportunity to stress once again the importance of all infrastructure being in place and – where appropriate – operational, before development takes place.

Thank you again for engaging with Natural England in this consultation process.

Please contact me if you have any questions about the content of this letter or would like to discuss these issues further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Helen Ward', with a large, sweeping flourish at the end.

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