

Greater Norwich Development Partnership (GNDP)

1. Infrastructure

1. Requirement following the Exploratory Meeting

- 1.1 The Inspectors notes of the Exploratory Meeting held on 13 May identified further work the Partnership needs to undertake around delivery of infrastructure in the Joint Core Strategy, extract below:
- 1.2 The Planning Inspectorate (PINS) document ‘Examining DPDs: Learning from Experience’ refers to important soundness-related matters on this topic (p7-8).
- 1.3 We drew attention (in our original Q1-2) to the **categorisation** in Joint Core Strategy (JCS) Appendix 7 of 80 infrastructure items as ‘critical’, either to the JCS as a whole or to certain parts of it. Identification of all these items as ‘critical’ could pose the risk of the JCS (or certain parts of it) being found unsound if the examination were to throw doubt on the timely delivery of any of these items. Para 26 of the PINS advice makes it clear that it is unhelpful to include reference to an infrastructure project if such reference is effectively a tactical means of adding weight to the case for a project which the provider is unlikely to be able to fund or support within the relevant timescale.
- 1.4 The PINS advice recognises the role that a complementary ‘live’ document such as Greater Norwich Development Partnership’s (GNDP) proposed **Integrated Development Programme** (IDP) can play in setting out the detailed steps necessary to realise the proposals of a Development Plan Document (DPD). It will be useful if the first version of this is available for the hearings. However, as the advice states (para 27), the key infrastructure items required to enable delivery of the major developments in the DPD need to be firmly and clearly identified in the DPD itself and their implementation shown to be reasonably assured.
- 1.5 Firmer evidence would be available about the major development-related elements of the JCS if ‘**critical path**’ evidence were to be prepared setting out the links between each of the key housing growth areas (in the table at p12 of the relevant topic paper - TP8) and the infrastructure necessary for their completion within the timescale of the housing trajectory indicated on p13 of TP8.
- 1.6 It would be helpful if the critical path can be augmented by brief information about the providers and funders in the case of each piece of infrastructure, together with information drawn from the evidence base about the degree of **sign-up of the providers** (see PINS advice para 22). It was somewhat concerning that GNDP seemed to take the view that service providers cannot confirm their intentions until the JCS is ‘in place’. This is not the way

that Planning Policy Statement 2: Local Spatial Planning (PPS12) or the PINS advice considers ‘effectiveness’. Proposals in DPDs are unlikely to prove sound if the relevant providers have not indicated that there is a reasonable prospect that linked infrastructure can be completed on time.

- 1.7 It would also be helpful if the critical path can identify **which infrastructure projects are truly ‘critical’** and which may be of lesser importance but still desirable, since we have found that the evidence base can convey mixed messages about (a) the degree of criticality of certain infrastructure projects (i.e. to extent to which they represent a fundamental constraint on the commencement of development) and (b) the likelihood of their delivery within the necessary timescales.
- 1.8 [We recognise that the infrastructure needs of the major development locations do not stand entirely alone but have to be considered alongside the needs generated by committed or anticipated development within the main urban area and the ‘other sites’ to be allocated in Broadland and South Norfolk, and that assumptions about these other sites have to be built into the critical paths. It will therefore be important to include some clear information about those assumptions in this exercise.]
- 1.9 Brief summary of the response given to the Inspector at the EM:
1. The use of the term ‘critical’ did not relate to the definition in the Infrastructure Needs and Funding Study (INF1) – the GNDP recognised that the tables could be clarified and volunteered to re-visit the list making it clear what the dependencies are and their categorisation.
 2. The IDP is work-in-progress, a copy will be available at the hearings, it will be signed off by GNDP Policy Group
 3. An Engagement Strategy has been agreed and meetings with Service Providers are booked to discuss delivery.
 4. The IDP will be reviewed 6-monthly

2. **Work Programme for completion before the hearings**

- 2.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.
- 2.2 PINS Guidance -The Inspector referred (in 1.2) to the Planning Inspectorate (PINS) document ‘Examining DPDs: Learning from Experience’ (p7-8). The guidance accepts that,

“the amount of detail that it is possible to supply is likely to be less certain and comprehensive for the later stages of the plan period...for the first five years of the plan it should be clear what infrastructure is required, who is going to find and provide it and how it is going to relate to the rate of development...”

“Clearly many planning authorities are finding it difficult to effectively engage with the infrastructure providers. In some instances there appears to be very little that a planning authority can do about this...the Inspector will take a realistic view about what the council can provide so long as the council has made all reasonable attempts to engage with the infrastructure provider in question. Councils who face these sort of difficulties should provide, in the evidence base, details of what steps they have taken and what assumptions have been made in response to the difficulties...”

The guidance notes confirm that there could be a number of uncertainties that have to be taken into account by the Inspector.

- 2.3 **Categorisation** - a review of Appendix 7 in the JCS will be undertaken, removing the use of the word ‘critical’. The list of infrastructure will be categorised priority 1, 2 and 3 with a clear definition of each priority. The list of infrastructure will be aligned with the housing trajectory to show the dependencies and phasing associated with the major developments.

Output 1: revised tables in the IDP showing priority 1, 2 and 3 infrastructure in the short, medium and long-term in line with the housing trajectories.

- 2.4 **IDP** – A well-developed version of the IDP will be provided as additional evidence for the hearings, signed off by GNDP Policy Group

Output 2: signed-off version of IDP

- 2.5 **Critical path** – the above categorisation will provide sufficient information to prepare a critical path. Identifying risks and constraints that can be included in the JCS

Output 3: illustrate the critical path as identified in 1.7 of the Inspector’s conclusions.

Agreed with Go-East this is a minor textural change to the Joint Core Strategy (and will not be part of the focussed consultation).

- 2.6 **Sign-up by providers** -
As stated in the GNDP Response to Inspectors questions 9 April 2010

“Engagement with key service providers is continuing through the development of the IDP.

An Engagement Strategy has been agreed with the GNDP Leaders and is being implemented. The County Council is a key provider of strategic infrastructure and is part of the GNDP. The County Council has been fully

involved with the production and approval processes of both the JCS and IDP. A draft of the IDP document will be available to the Inspectors prior to the examination”

Output 4: Provide the Inspector with a statement that sets out the evidence that the key infrastructure providers signed up to INF1

Provide a timetable of meetings, agendas and action notes for each of the key infrastructure providers that are taking place over next 5 months

Supply the Inspector with position statements from the key infrastructure providers for the October hearings

2.7 **Projects linked to this work**

Development of a charging schedule for a CIL or tariff including an economic viability study

3. **Outputs summary, resources and timetable**

	Output	Who	By when
1.	Categorisation IDP tables showing priority 1, 2 and 3 infrastructure in the short, medium and long-term.	Ruth Charles, Sandra Eastaugh, Phil Morris, Richard Doleman	17 June 2010
2.	Integrated Development Programme IDP version 1	Ruth Charles, Sandra Eastaugh, PSG, IDP sub-group	27 August 2010
3.	Critical Path for inclusion in JCS Illustrate the critical path as identified in output 1. To be consulted on as additional minor change to the Joint Core Strategy. Note: Agreed with Go-East this is a minor textural change to the Joint Core Strategy (and will not be part of the focussed consultation).	Phil Morris, Richard Doleman, Sandra Eastaugh, Ruth Charles	19 July 2010
4.	Sign-up by providers Statement showing how key infrastructure providers have signed up to INF1 Collate timetable of meetings, agendas and action notes Obtain position statements from key infrastructure providers	Ruth Charles Amy Baxter Sandra Eastaugh\Richard Doleman	17 June 2010 17 June 2010 27 August 2010

Greater Norwich Development Partnership (GNDP)

2. Affordable Housing

1.0 Requirement following the Exploratory Meeting

- 1.1 The Inspector's notes of the Exploratory Meeting held on 13 May identified further work the Partnership needs to undertake around Affordable Housing in the Joint Core Strategy. The inspector asked for a Housing Assessor to be appointed for 3 days to provide specialist support on the Affordable Housing Policy, Mr Nigel Jones was appointed and provided a report to the Inspector. The conclusions from the Inspector's report are set out below:
- 1.2 Planning Policy Statement 3 Housing (PPS3) para 29 states that Local Development Documents (LDDs) should set out the range of circumstances in which AH will be required in terms of both thresholds and proportions. It also requires an informed assessment of the economic viability of such proposed thresholds and proportions. At the EM we indicated our concern that the economic viability testing in documents H5 and INF1 may not be fully robust and credible.
- 1.3 **Additional factors** - PPS3 para 29 requires that LDDs should **set an overall** (ie plan-wide) **target** for the amount of AH to be provided. It is not clear that such a numerical target for the plan period has been devised, taking account of committed housing developments with existing planning permission and developments on sites below the proposed JCS site size threshold. Without such an overall target it may be more difficult to monitor the success or otherwise of the policy. [On a related matter, it would also be helpful to the understanding of the JCS if it gave some perspective on the number of units expected to result from the rural exceptions schemes clause of policy 4.]
- 1.4 PPS3 para 29 also indicates that LDDs should **set separate targets for social rented and intermediate AH** where appropriate; specify the size and type of AH likely to be needed in particular locations; and set out the approach to developer contributions. The JCS appears to indicate that other LDDs will fulfil some of these functions, but greater specificity on this point would be helpful to the clarity of the JCS.
- 1.5 It appears that further work is required to take account of the above points. It is not for us to specify the precise methodology of such work, but in our view it should provide a more **transparent assessment of the realistic capacity of the market to deliver AH** in association with much higher infrastructure contributions and code standards. Factors that need to be considered and tested are:

- Strong and weak market scenarios;

- The margin required between existing/alternative use value and residual land value in order to incentivise landowners to bring their land to the market (establishing a clear measure, based on local evidence);
 - A selection of S106/tariff/Code for Sustainable Homes assumptions, ranging from those secured in the H5 study up to the levels implied by the INF1 study;
 - The viability within the immediately foreseeable future of a range of proportions of AH below and up to 40% (with the potential for review if circumstances change further into the plan period);
 - Any potential for different proportions of AH to be sought in different geographical locations or development areas if the work indicates significant variations in land values and development costs across different parts of the JCS area.
 - Some overt testing of the proposed reduced site size threshold of 5 units.
- 1.6 In addition, normal reliance should not be placed on **grant availability** (albeit recognising that this could, in some circumstances, be an exceptional factor bringing viability to a limited number of otherwise unviable schemes).
- 1.7 Following this work, consideration will need to be given to the nature of any changes that may be needed to make the JCS sound in relation to AH. {Within this exercise account will also need to be taken of the 'additional factors' referred to above]
- 1.8 Brief summary of the response given to the Inspector at the EM:
1. The Partnership is not in a position to respond to the assessors report given the late receipt of the report.
 2. The partnership requires a clear brief in order to undertake further work. In the absence of guidance the Partnership would request clear guidance from the Inspectors as to the nature of the study that would meet the requirements of PPS3, Blyth Valley and the CIL regulations.
 3. If the Inspector wants something that addresses the requirements of PPS3 we could have something relatively quickly but we would have concerns that this would have to be undertaken of the absence of certainty about future CIL or tariff levels.
- 2.0 **Work Programme for completion before the hearings**
- 2.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.
- 2.2 **Affordable Housing targets** – calculate the number of dwellings required for the plan period in order to set a target for the amount of AH to be provided. Consider the number of units that are expected to result from the rural exceptions schemes. Add clarity to the JCS to set a target for the number of units required for socially rented and intermediate AH where appropriate.

- Output 1:** Calculate the housing targets as suggested by the Inspector to meet the requirements of 1.3 and 1.4 above. An additional paragraph of numerical and supporting text in the JCS
- 2.3 **Affordable Housing Study** – to meet the requirements of PPS3 and the concerns set out in 1.5 and 1.6 above. A brief for the study has been issued to Drivers Jonas Deloitte (as they carried out the earlier study work).
- Output 2:** AH Study to meet the requirements of PPS3 and address the Inspector’s concerns.
- Output 3:** Analysis of the report, paper to Directors, revision of JCS Policy
- 2.4 **Consultation** – 6 weeks to persons who made representations at Reg 27 and those asking to be notified (approx 170) plus advertisements
- Output 4:** Following minimum 6 week consultation, analysis of responses resulting in paper to Directors and GNDP Policy group for sign-off
- 2.5 **Projects linked to this work**
Feed into the IDP work especially development of a charging schedule for a CIL or tariff including an economic viability study.
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3.0 Outputs summary, resources and timetable

	Output	Who	By when
1.	Affordable Housing targets Calculate the numerical housing targets to incorporate in the JCS	Roger Burroughs, PSG	17 June 2010
2.	Affordable Housing Study <ul style="list-style-type: none"> • Project Brief submitted to Drivers Jonas on 1 June 2010 • Proposal, Project Plan including resources from Drivers Jonas 4 June • Procurement complete by 4 June • Inception Meeting with GNDP team by 11 June 2010 (ideally 9 June 2010) • Drivers Jonas carries out the study from 4 June to 2 July • Drafted report to be submitted to GNDP for comment by 2 July • City Council Exec sign off • Final report submitted to GNDP by 9 July 	Lead: Roger Burroughs PM Support: Helen Lambert	2 July 7 July 9 July
3.	Amend JCS AH Policy Use finding of the Study to re-draft the AH Policy in JCS Prepare paper to Directors for agreement to consult	Roger Burroughs	9 July 2010
4.	Consultation process 6 weeks consultation on revised AH Policy and numerical text to be added to JSC Adverts and letters	Ruth Chales, Helen Lambert, Amy Baxter, Helen Bartlett	19 July – 30 August 2010 10 September 2010

Brief – Affordable Housing
Project Lead – Roger Burroughs

	Analysis of responses and report to Directors and Policy group Full Council sign-off: <ul style="list-style-type: none">- Broadland- Norfolk- Norwich- South Norfolk		23 September 2010 28 September 2010 27 September 2010 28 September 2010 20 September 2010
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Greater Norwich Development Partnership (GNDP)

3. The distribution of development, particularly in relation to public transport opportunities

1.0 Requirement following the Exploratory Meeting

- 1.1 The Inspectors notes of the Exploratory Meeting held on 13 May identified further work the Partnership needs to undertake. The main points from the Inspector's conclusions reached by the Inspectors are set out below:
- 1.2 A clear **evidence-based explanation and audit trail for Option 2A** – why is it most appropriate strategy compared to reasonable alternatives? – why was it chosen contrary to the SA (ref: EIP14(1)) conclusions?
- 1.3 Clearer evidence about the nature and level of JCS proposed **public transport improvements**, their viability, deliverability and timescales – Does the development distribution provide for improvements (including turn-up-and-go services) in a reasonable time rather than become long term aspirations with little effect on short-medium term travel patterns?
- 1.4 Sufficiently challenging modal shift targets.(Will evidence conclude that the growth distribution can support and promote a culture change from car reliance to sustainable transport?)

Inspector's comments taken from text

- Option 2A is effectively the same as the JCS.
- Pre-engagement Inspector: lack of evidence to support Option 2A
- SA for Reg 25 consultation (Ref. EIP14) - compares Options 1,2,3 and 2A, but 2A had the worst medium term assessment.
- Suitability re meeting RSS Policy NR1 objective to “achieve a major shift in emphasis across the NPA to travel by public transport, walking and cycling”? (while reflecting PPG13 Transport para 6 to actively manage urban growth to make the fullest use of public transport and locate housing where highly accessible by non-car transport modes?)
- Large scale growth should allow for SMART modal shift targets.
- SA of JCS (Ref: JCS3): South Norfolk difficulties in achieving a high degree of self-containment and providing attractive public transport; A11 growth corridor uncertainties re BRT deliverability and viability; para 2.2.57, no SN growth areas could support turn-up-and-go buses, even by 2021
- Long Stratton soundness concerns – SA of JCS – less suited to encouraging sustainable travel; less accessible to Norwich and major employment locations; proposed growth undoubtedly a significant negative effect on the strategy – SA of “Issues and Options” – conclusions negative re access even with bypass; concluded not a suitable location for investigations for strategic growth.
- SA of JCS states growth small % of whole so therefore has a small impact on overall sustainable travel; but JCS SA cannot say local level

benefits outweigh strategic disbenefits; response is to focus on mitigation measures and to develop “a bespoke vision for achieving an ambitious degree of self containment within Long Stratton”

- Depending upon the outcome of this work GNDP will need to consider whether changes to the JCS would be necessary to make it ‘justified’, ‘effective’ and consistent with national policy’ in the above terms.

1.5 Brief summary of the response given to the Inspector at the EM:

1. The Sustainability Appraisal shows that all locations, including Long Stratton, are very good in principle for providing cycling and walking opportunities to work and services. All locations are on proposed corridors that are identified for public transport enhancement.
2. Paragraph 6.13, page 66 of the JCS notes that, ‘While Long Stratton is not as well related to employment or high quality public transport, this is outweighed by the availability of a good range of local jobs, services and other community facilities and the significant local benefits of a development-led bypass. To ameliorate the impact of more limited opportunities for non-car trips to specific locations and other facilities in Norwich, it will be particularly important to take a ‘whole-settlement’ approach to the development of Long Stratton to maximise the number of trips on foot, or by cycle’.
3. Current timetables show Long Stratton is served by a dedicated half – hourly service Monday – Saturdays 7am – 7pm. It is also served by through services. Long Stratton proposals include enhancement to bus journey time reliability on the route into Norwich.
4. Bus Rapid Transport is the end result of continuous improvement to bus routes and corridors, these improvements will happen over a period of time. Measures can be introduced on corridors to enhance public transport services and build towards bus rapid transit.
5. How the opportunities to enhance public transport, walking and cycling are developed depends on how the NATS is implemented – the NATS Implementation Plan is still in development – the role of NATS will be to maximise public transport, walking and cycling opportunities in growth locations.
6. The JCS aims to have growth locations served by high quality public transport and the locations selected have the potential for this.

2.0 **Work Programme for completion before the hearings**

2.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.

2.2 **Sustainability Appraisal and selection of locations, including Long Stratton, as locations for growth** - Clarify the audit trail from Option 1 at Issues and Options stage through to option 2+ which became the ‘favoured option’. At the hearing we agreed to provide the Inspector with a table that clearly sets out the SA results and the reasoning to select the ‘favoured

option' (note: this is not 2A as referred to by the Inspector in his conclusions).

Output 1: Review the Topic Paper that sets out the stages to agree the major growth locations as in the 'favoured option' and clarify how the decisions link together and can be traced back to Option 1

Output 2: Prepare a table setting out the SA work, clearly explaining what SA said and the mitigations, especially for Long Stratton

Output 3: Point the Inspector to the evidence that supports the long-term 'vision' for Long Stratton and the degree of self containment within it

2.3 **Public Transport Improvements and modal shift targets**– supply the Inspector with a copy of the document that sets out the definition Bus Rapid Transport, bus improvements etc. Clarify para 2.2.59 of the SA in relation to the borderline comment re Wymondham, Hethersett and Cringleford. Show how NATS incorporates public transport improvements, and set out the steps that will be taken to monitor NATS implementation. (*Transport Strategy meeting taking place on 10 June to discuss and identify work required – update after meeting*)

Output 4: Supply BRT paper (Already exists)

Output 5: Clarify SA re A11 corridor 'borderline' comment

Output 6: Signpost the Inspector to evidence that already exists to support the public transport improvements

Output 7: Paper setting out how the NATS implementation plan incorporates public transport improvements and walking and cycling opportunities. Paper to also set out the mechanism for a producing a baseline for public usage and the derivation of mode shift targets and the mechanism for a monitoring regime

2.4 **Projects linked to this work**

Feed into the IDP work especially the short, medium and long targets

3.0 Outputs summary, resources and timetable

	Output	Who	By when
1.	Review Topic Paper TP8 and clarify how the decisions link together and can be traced back to Option 1	Dave Willis	30 June 2010
2.	SA Table clearly explaining what SA said and the mitigations, especially for Long Stratton	PSG Dave Willis focus on Long Stratton	16 July 2010
3.	Long Stratton 'vision' - Point the Inspector to the evidence that supports the long-term 'vision' for Long Stratton and the degree of self containment within it	Dave Willis	16 July 2010
4.	Supply BRT paper - supplied by Jeremy Wiggen	Amy Baxter add to evidence	30 June 2010
5.	Public Transport Improvements - evidence <ul style="list-style-type: none"> • Clarify SA re A11 corridor 'borderline' comment • Signpost the Inspector to evidence that already exists to support the public transport improvements • Paper setting out how the NATS implementation plan incorporates public transport improvements and walking and cycling opportunities. • Paper to also set out the mechanism modal shift targets (<i>work to be agreed with Transport Strategy Team 10 June meeting</i>)	Mike Payne David Allfrey Richard Doleman, Transport Strategy Richard Doleman, Transport Strategy	16 July 2010 Draft 19 July 27 August 2010 Draft 19 July 27 August 2010

Greater Norwich Development Partnership (GNDP)

4. Northern Distributor Road (NDR)

1. Requirement following the Exploratory Meeting

- 1.1 The Inspectors notes of the Exploratory Meeting held on 13 May identified further work the Partnership needs to undertake around the role of the NDR. The Inspector set out two main concerns in terms of the availability of evidence
- 1.2 Firstly, we are still of the view that there is an absence of a clear and realistic implementation strategy to ensure that adequate bus provision is provided in line with housing growth and at an early stage in the plan period; and secondly, if the necessary funding for the NDR were not to materialise to the timescale currently expected by GNDP, we consider the JCS unclear about how its proposals would be implemented and subsequent LDDs affected.
- 1.3 The Inspectors conclusions state - In our view further work is required to provide clearer evidence about the following matters and the terms of any necessary changes to the JCS:
 - the nature and extent of the **public transport improvements** considered critical to the JCS proposals for the northern part of the City and its associated growth areas;
 - the **funding of such improvements**;
 - the possible inclusion in the strategy of reference to the development of **thresholds/ trigger mechanisms** in relation to progressive stages of development;
 - the implications for the JCS of any **delay in achieving the NDR** both as a partial route to the A140 and along the whole of its proposed length to the A1067;
 - suitable **modal shift targets** for the northern PT corridors in the plan area.
- 1.3 The Inspector also raised concerns about uncertainty, extract from the report below:

PPS12 para 4.10 states that it is important that a core strategy makes proper provision for uncertainty and does not place undue reliance on critical elements of infrastructure whose funding is unknown. At the EM mention was made of an estimated shortfall of around £40 million in relation to the NDR. This must raise concerns about the realism of the proposal. Consideration therefore needs to be given, in the face of this uncertainty, as to **how much of the JCS could be delivered without the NDR**. Presumably the housing proposals in the area to the south of the NPA would be unaffected. What would happen to employment allocations in and around the north side of Norwich, such as near the Airport? How many of

the PT corridors would be jeopardised, including any orbital routes? Would BRT be deliverable?

1.4 Brief summary of the response given to the Inspector at the EM:

1. The NDR is part of the Norwich Area Transportation Strategy (NATS) and will:
 - Reduce congestion on strategic routes to the north of the city
 - Reduce noise, air pollution and accidents for communities in the northern suburbs of Norwich and villages outside
 - Enable removal of through traffic from the city centre and implementation of widespread pedestrian / bus priority measures.
 - Provide direct access to growth locations, helping to deliver significant housing and employment growth
 - Support the continued success of the Norwich economy.
2. The NDR will be connected to the national trunk road network at the A47 at Postwick and improves access to Norwich International Airport as well as key existing and proposed housing and employment sites. As a part of NATS, the NDR provides the potential for modal shift to more sustainable forms of transport.
3. The NDR will:
 - Remove traffic in the northern suburbs of Norwich along roads that are residential in nature and not suited to high traffic levels
 - Provide the conditions for restricting through traffic enabling the introduction of further bus priority, walking and cycling measures
4. The NDR is part of a NATS Implementation Plan that includes significant enhancements to walking and cycling and public transport improvements ranging from small scale measures up to the provision of full Bus Rapid Transit (BRT) along key radial routes into Norwich. The modelling evidence shows that the NDR will provide traffic relief across the city centre. The reduction in traffics will allow the introduction of significant improvements to public transport, walking and cycling.
5. Introduction of public transport, walking and cycling measures will reinforce the function of the NDR to remove through traffic pressures from unsuitable areas of the network like the northern suburbs and the city centre.
6. Existing transport corridors in Norwich that have extensive bus priority measures are shown to perform significantly better in terms of bus service punctuality than corridors that lack bus priority. The NDR gives traffic reductions on key routes and provides the conditions for bus priority measures to be provided on more corridors.

2. **Work Programme for completion before the hearings**

- 2.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.

2.2 **Public Transport Improvements** – this is directly linked to the concerns raised for the work under ‘distribution of development, particularly in relation to public transport opportunities’. We will not duplicate the work but the Inspector does raise concerns about the northern part of the city and the growth area and evidence that there will be suitable public transport in place alongside the development to encourage the use of public transport.

Output 1: NATS Implementation plan to expand on elements relating to the north east part of the city. NATS needs to give assurance on programme of work, phasing, indicate what will be the trigger to the public transport improvements starting

Output 2: Funding of Public Transport schemes - this will be covered in the housing trajectory and priority tables in the IDP that set out priorities, timetable and funding.

Output 3: An evidence based report showing the opportunities provided by the NDR to increase public transport improvements, showing what these may be and how they contribute to enhanced bus provision – (what can be delivered pre and post NDR).

2.3 **Phasing in north-east pre and post NDR** – Supply the Inspector with information about the process following Programme Entry Status. Direct the Inspector to evidence in the supporting documents already supplied relating to public transport improvements. Supply information on what can be delivered in the north-east pre NDR and what follows including interventions and public transport plans. Also provide the Inspector with any new documents that give confidence on funding of NDR and Postwick hub.

Output 4: Critical path for delivery of housing in north-east showing how development is linked to NDR delivery, provide a timetable showing trigger points. Critical path to also show how any delay will affect housing trajectory

2.4 **Modal Shift targets** – linked to the north east in particular. Direct the Inspector to evidence that already exists, BRT work taking place on Newmarket Road, Dereham Road, and planned work for Salhouse Road. Provide evidence of Smarter Choice Travel Plans that already exists to demonstrate that improvements to public transport are already happening and will continue.

Output 5: Signpost the Inspector to evidence that will clarify the intention to deliver public transport improvements and provide an update on public transport improvements already planned or completed to date.

2.5 **Projects linked to this work**

Development of a charging schedule for a CIL or tariff including an economic viability study

3. **Outputs summary, resources and timetable**

	Output	Who	By when
1.	NATS Implementation plan to expand on elements relating to the north east part of the city. NATS needs to give assurance on programme of work, phasing, indicate what will be the trigger to the public transport improvements starting	Richard Doleman, Ann Carruthers, Transport Strategy team	19 July 2010
2.	Funding of Public Transport schemes – picked up in IDP	Ruth Charles, Sandra Eastaugh, PSG, IDP sub-group	19 July draft 27 August 2010
3.	An evidence based report showing the opportunities provided by the NDR to increase public transport improvements, (what can be delivered pre and post NDR)	Richard Doleman to liaise with David Allfrey and NDR team	19 July draft 27 August 2010
4.	Critical path for delivery of housing in north-east showing how development is linked to NDR delivery, provide a timetable showing trigger points.	Richard Doleman to liaise with David Allfrey and NDR team	19 July draft 27 August 2010
5	Signpost to evidence -to clarify the intention to deliver public transport improvements and provide an update on public transport improvements already planned or completed to date.	Richard Doleman to liaise with David Allfrey and NDR team	19 July

Greater Norwich Development Partnership (GNDP)

5. Sustainability Issues – Green Infrastructure

1. Requirement following the Exploratory Meeting

1.1 The Inspectors notes of the Exploratory Meeting held on 13 May identified further work the Partnership needs to undertake to address their concerns in relation to green infrastructure, energy efficiency and water.

1.2 **Green Infrastructure** concerns, extract from the Inspectors note:

In our note for the EM, we asked whether the green infrastructure concept is sufficiently embedded in the JCS and questioned whether the JCS provides a **clear steer for further DPDs**. We also expressed concern that some of the DPDs to deliver green infrastructure at a more detailed level are not programmed in the Local Development Scheme (LDS). GNDP stated that they would **update the LDS** to take on board these points and clarify the **incomplete diagram on page 35**.

In our view it is necessary for the JCS to set out with greater clarity the purpose and deliverability of green infrastructure within the plan area and the means by which its detailed planning will be taken forward and implemented.

1.3 Brief summary of the response given to the Inspector at the EM:

1. The team assured the Inspector that there was every intention to include green infrastructure within the Site specific DPDs. The DPDs that follow the JCS will integrate green infrastructure and will have to be consistent with the JCS. Districts agreed to update the LDS where required.
2. The Green Infrastructure Study ENV 6 – a draft strategy - forms part of the evidence base for the JCS. ENV 2 - The Green Infrastructure Delivery plan moves the study forward.

2. Work Programme for completion before the hearings

2.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.

2.2 **DPDs:** Produce a table\diagram that sets out what daughter documents will be produced following the JCS. Each district to ensure their LDS is up-to-date and include info in the table. **GI Draft Strategy** – review status of the draft document and clarify its status for following DPDs.

2.3 **Replace Diagram** on page 35 of JCS– Already logged as a minor change as the legend is missing. regularly

Brief – Sustainability issues
Project Lead – Mike Burrell

- Output 1:** Produce table\diagram of documents to follow JCS for each district
- Output 2:** Check LDS for each district and update where required.
- Output 3:** Replace diagram on page 35 of LDS (already done)

2.4 **Projects linked to this work**

IDP and CIL\Tariff contributions towards green infrastructure.

Sustainability Issues – Energy Efficiency

3. **Energy Efficiency** concerns, extract from the Inspectors note:

The overall message of the Planning Policy Statement 1 Planning and Climate Change (PPS1 supplement) appears to be either to keep to **national targets** to be expressed through progressive tightening of the Building Regulations or, if appropriate, to propose alternative requirements provided that local circumstances clearly warrant and allow that. It is clearly stated that such requirements should focus on ‘development area or site-specific opportunities’.

It is unclear whether the local study ENV5 establishes that realistic energy generation potential in the area so comparatively exceeds any national norm as to represent a major ‘**local circumstance**’ likely to be able to **justify such a policy**.

While the scale of development at the major locations identified in the JCS may provide opportunities for the type of ‘development area or site-specific’ approach referred to in the PPS1 supplement (if other circumstances are right), **policy 3 does not clearly address that point or relate to the major locations**.

Another area of concern centres on **housing delivery**. ENV5 goes into some detail on what might be the acceptable costs for developers in achieving zero carbon standards. The study appears to rule out the practicability of zero carbon measures for at least 44% of the new housing (urban and rural infill schemes and some of the smaller expansion areas). Planning Policy Statement 22: Renewable Energy (PPS22) advises that **targets should not be framed so as to place an undue burden on developers**; this message is reflected in East of England Plan Policy ENG1, which tempers ambition with viability in selecting targets.

If the impact of policy 3 were likely to result in **significant viability doubts** for certain forms and types of housing, (eg affordable housing on small infill sites that are often in sustainable locations), GNDP may need to consider whether or not changes to the JCS would be necessary to make it ‘justified’, ‘effective’ and ‘consistent with national policy’

We conclude that there is a need for GNDP to consider whether policy 3 should be made consistent with national policy, simplified, and made more straightforward to administer.

3.1 Brief summary of the response given to the Inspector at the EM:

1. The team assured the Inspector that there was evidence to support Policy 3 from the study. The Policy is based on evidence from the Sustainable Energy Study for the Joint Core Strategy. Following advice from the evidence study, it provides a selective approach for energy

production for new development dependent on the scale of development as larger scale on site energy production is more cost effective. It does not differentiate between Code for Sustainable Homes requirements as the higher the standards of energy efficiency in new housing, the lower the amount of energy required to serve the development.

4. **Work Programme for completion before the hearings**

4.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.

4.2 **Justification of Policy 3** – Provide the Inspector with an explanation on why Policy 3 is justified and relate the study to the nationally prescribed guidance that was followed. Review the evidence in the Study and signpost the Inspector to the evidence to support the Policy. Provide an explanation of the requirements for major and smaller locations and check that the Policy makes the requirements clear.

Output 1: Paper for the Inspector clarifying the evidence from the Energy Study which provided the basis for the Policy

4.3 **Viability of housing delivery** – This will be included in the Affordable Housing study – check that it covers all concerns raised by the Inspector.

Output 2: Provide evidence from the Affordable Housing Study

4.4 **Projects linked to this work**

Affordable Housing viability study – to assess effect of any additional burden if higher targets are in place above national policy.

Sustainability Issues – Water

5. **Water** concerns, extract from the Inspectors note:

Our main concerns relate to **possible impacts on the quantity and quality of water courses**, including the Broads, in relation to water abstraction and whether the **capacity of the waste water treatment** infrastructure is likely to be capable of improvement to accommodate the demands that would be progressively placed on it during the plan period. In particular, it would appear that progress in delivering the **north-east** growth sector would be limited to **4,000** dwellings in advance of the main interceptor sewer.

For the JCS to be effective, the practicability of the improvement measures for the water and sewerage infrastructure, and the availability of adequate sources of funding, needs to be realistically identified and linked to the critical path.

5.1 Brief summary of the response given to the Inspector at the EM:

1. Over-abstraction is not an issue – the review of consents will give Anglian Water the opportunity to resolve the issues (this is endorsed by the Position Statements).
2. The Partnership is actively engaged with Anglian Water and a series of meetings are underway, the first meeting to consider delivery was held on 6 May 2010.. Discussions are also ongoing with the Landowner at Long Stratton.

6. **Work Programme for completion before the hearings**

6.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.

6.2 **Impacts on water courses:** The Inspectors concerns on water supply and waste management continue to be managed via conversations with Anglian Water, Environment Agency, Natural England and the Broads Authority. The issues are well-known to the GNDP and are also being managed at a regional level by the Water Partnership Board via GO-East. The GNDP will continue to work with Anglian Water to understand potential solutions.

Output 1: Supply the Inspector with a record of meetings, and meeting notes prior to the EIP to show how the water and waste issues are being managed.

Output 2: Provide update position Statements from Anglian Water, Environment Agency, Natural England and Broads Authority for the EIP.

6.3 **North-east, limits on development :** Discussions with Anglian Water already indicate that solutions to connection of new developments will be

Brief – Sustainability issues
Project Lead – Mike Burrell

dealt with on a case by case basis when planning applications are received, taking account of the findings of the Water Cycle Study. Certainty over the best solutions cannot be known at present – dialogue will continue with Anglian Water. Funding will be picked up in the IDP.

Output 3: Supply the Inspector with a record of meetings, and meeting notes prior to the EIP to show how the water and waste issues are being managed.

6.4 **Projects linked to this work**

IDP and CIL\Tariff contributions towards water issues.

7. **Outputs summary, resources and timetable**

	Output	Who	By when
	Green Infrastructure		
1.	<p>DPDs Produce table\diagram of documents to follow JCS for each district</p> <p>LDS updates - Check LDS for each district and update where required.</p> <p>Output 3: Replace diagram on page 35 of LDS</p>	<p>Roger Burroughs, Tim Horsepole, Mike Burrell</p> <p>Amy Baxter</p>	<p>19 July 2010</p> <p>(already prepared)</p>
	Energy		
2.	<p>Justification of Policy 3 - Paper for the Inspector clarifying the evidence from the Energy Study which provided the basis for the Policy</p> <p>Viability concerns - Provide evidence from the Affordable Housing Study and signpost to the Inspector</p>	<p>Mike Burrell</p>	<p>19 July 2010</p>
	Water		
5	<p>Impact on Water Courses: Supply the Inspector with a record of meetings, and meeting notes prior to the EIP to show how the water and waste issues are being managed.</p> <p>Provide update position Statements from Anglian Water, Environment Agency, Natural England and Broads Authority for the EIP.</p> <p>North-east , limits on development - Supply the Inspector with a record of meetings, and meeting notes prior to the EIP to show how the water and waste issues are being managed.</p>	<p>Mike Burrell</p> <p>Mike Burrell, Amy Baxter</p> <p>Mike Burrell, Roger Burroughs</p>	<p>27 August 2010</p> <p>27 August 2010</p> <p>27 August 2010</p>

Greater Norwich Development Partnership (GNDP)

6. The North-East Triangle

1. Requirement following the Exploratory Meeting

1.1 The Inspectors notes of the Exploratory Meeting held on 13 May identified further work the Partnership needs to undertake to address their concerns in relation to the north-east triangle.

1.2 The Inspector raised three main concerns, extract from the Inspectors note:

The **first** is **procedural**: is it appropriate for the post-submission change re-labelling the growth area a 'strategic allocation' (to be followed up via a Supplementary Planning Document - SPD), rather than a growth 'location' (to be followed up through an Area Action Plan - AAP) to be regarded as a 'minor' one which can be treated as embedded in the submitted strategy? Or is this a change which should be **advertised** so that members of the public are presented with the opportunity, should they wish to do so, of making representations about the soundness or legal implications of proceeding in that way? In our view this is a change which should be advertised and we ask that this be done.

The **second** concern relates to whether or not policy 10 gives a fully effective strategic, statutory brief for future planning on the 'what/where/when/how' questions surrounding the planning and effective delivery of the growth triangle, given that some of GNDP's replies to our initial Q19 are not clearly specified or referenced in the JCS itself. In particular, there is no clear description of the way in which **a single coordinated approach will be secured to the planning of the 'whole area'**, particularly the provision of timely, appropriately-located and equitably financed infrastructure. Inferences about some of these matters can be gained from other sections of the JCS but in view of the size of this area, and its centrality to the JCS, some further detail within the policy and its accompanying text seems to be required.

Our **third** concern relates back to matters raised previously in this letter – ie the evidential soundness behind the JCS references to the **public transport infrastructure** intended to serve this major development area, eventually accommodating at least 10,000 dwellings. This concern is emphasised by the fact that the first stages are likely to be in a detached (currently rural or semi-rural) location at the Rackheath Ecotown, an area which will only slowly become a physical part of the wider urban area over a length of time as yet unknown. We would look for convincing evidence that there is a realistic prospect of high quality, regular services being available at an early date.

1.3 Brief summary of the response given to the Inspector at the EM:

1. In practicality Rackheath Eco-Community comes forward quickly because of funding not through any deliberate phasing – the rest of the Growth Triangle will come forward as quickly as it is able to.
2. There will be a signed consortia agreement to co-ordinate development.
3. Consultants are being engaged to develop a Masterplan which will be consulted on.

2. **Work Programme for completion before the hearings**

2.1 In order to address the Inspectors concerns there is a considerable amount of work that will be completed and provided as additional evidence prior to the EIP in mid-October.

2.2 **Procedural:** A Concept Statement will be prepared on the north-east triangle that can be added to the JCS as an Appendix. Broadland District Council have decided not to advertise and consult on the principles for development in the north-east area, this will be undertaken as part of the GNDP consultation on proposed changes to the JCS.

Output 1: The Concept Statement will be included in the JCS consultation as part of the proposed changes

2.3 **Single co-ordinated approach:** The response submitted to the Inspectors pre-EM meeting questions set out the intended approach as below:

Need for overall coordination:

- The JCS policy stresses the need for **single coordinated approach**, with more **detailed masterplanning** of each individual quarter. The progress of the eco community will be guided by the specific requirements of the PPS 1 supplement .The GNDP, and Broadland District Council, recognize the desirability of the triangle as a whole comprising individual quarters with their own identity, and that this is likely to be best achieved by having a dedicated master plan for each. However, there are certain aspects which need co-ordination across the individual quarters
- Development of the parts of the triangle (outside of the Eco-Community) is dependent on the cooperation of a number of landowners. However, over the development of the JCS, these have largely coalesced into two groups, Broadland Land Trust, represented by Savills, and a group fronted by Bidwells/ Blue Living. Both have submitted co-ordinated representations in response to the publication of the JCS
- One of these groups, Broadland Land Trust, has already initiated some preliminary thinking on masterplanning through a scoping event led by the Prince's Foundation for the Built Environment using the Enquiry by Design process.

Output 2: Broadland DC intend pursue 'sign-up' to a consortia agreement.

2.4 **Public transport infrastructure** intended to serve this major development area, eventually accommodating at least 10,000 dwellings.

Output 3: Need to ensure this is covered in the by Public Transport work being carried out to meet Inspectors concerns on the wider PT issues, with a specific reference to phasing and funding in north-east pre and post NDR.

2.5 **Projects linked to this work**

The post EM brief covering ‘The distribution of development, particularly in relation to public transport opportunities’

3. **Outputs summary, resources and timetable**

	Output	Who	By when
1.	Procedural The Concept Statement on the north east triangle will be included in the JCS consultation as part of the proposed changes	Roger Burroughs and BDC	19 July to 30 August 2010
2.	Single coordinated approach Broadland DC will continue pursue 'sign-up' to a consortia agreement	Roger Burroughs and BDC	Approx Sept 2010
3	Public transport infrastructure: Ensure this is covered in the by Public Transport work being carried out to meet Inspectors concerns on the wider PT issues, with a specific reference to phasing and funding in north-east pre and post NDR.	Richard Doleman, Ann Carruthers, Transport Strategy team	27 August 2010

Greater Norwich Development Partnership (GNDP)

7. Consultation

1. Requirement following the Exploratory meeting

1.1 The Inspectors notes of the Exploratory meeting held on 13 May identified further work the Partnership needs to undertake prior to the Joint Core Strategy EIP.

1.2 The areas identified are:

- Infrastructure
- Affordable housing
- The distribution of development
- Northern Distributor Road
- Sustainability Appraisal
- The North-East growth triangle

1.3 As a result the Partnership may be required to consult on a number of changes to the Submission document of the Joint Core Strategy. These changes would be the following:

- Policy 4:Housing delivery – the results of the Affordable housing Study will determine if the policy requires amendment
- Affordable housing numerical targets – to be added as requested by Inspector
- Additional appendix: North-east concept statement
- Sustainability appraisal

2. Work programme for completion before the hearings

2.1 **In order to meet the requirements of the Town and Country Planning (Local Government) (England) Regulations 2004, if there is a decision to make any changes to the JCS the Partnership would be required to:**

- Make the schedule of proposed changes available at the District Council offices, County Hall and Dragonfly House
- Publish the changes on the Partnership's website
- Give notice of the consultation in the papers
- Give notice to those people who submitted regulation 27 representations and those people who requested to be notified
- Send the schedule of proposed changes to the government office
- If no changes are required the GNDP would write to the inspector making this clear and asking for the EIP to commence ASAP

24/06/2010

- **GNDP Policy Group sign-off for consultation**
Paper to Policy Group setting out the requirements and outline timetable. A note of Policy Group Meeting with recommendations to be approved by Councils at Meetings.

- **Council sign-off for consultation**
 - Broadland Full Council – 06/07/2010
 - City Council Full Council – 29/06/2010
 - South Norfolk Full Council - awaiting date
 - Norfolk County Council Cabinet – 12/07/2010
 -

- **Preparation of consultation materials**
Output 1: Consultation materials:
 - Schedule of proposed changes (see 1.3 above)
 - Document set-up on JDi
 - Press notice
 - Notice on www.gndp.org.uk and other district/county websites
 - Letter to representors
 - Letter to GO East

19/07/2010 – 30/08/2010

- **6 week consultation**
Output 2: Consultation
 - Log of representations received
 - All representations logged in JDi

17/09/2010

- **Review representations**
Output 3: Statement of representations received and summary of issues raised
Output 4: Copies of representations received

23/09/2010

- **GNDP Policy Group** Paper on results of consultation seeking approval to submit to Inspector.

- **Full Council sign-off** Minutes / recommendations to be ratified at Council meetings:
 - Broadland (Full Council) – 28/09/2010
 - Norwich City Council (Full Council) – 28/09/2010
 - South Norfolk (Full Council) – 20/09/2010
 - Norfolk County Council (Cabinet)–13/09/2010or11/10/2010

3. **Outputs summary, resources and timetable**

	Output	Who	By when
1.	Output 1: Consultation materials: <ul style="list-style-type: none"> • Schedule of proposed changes • Sustainability appraisal • Document set-up on JDi • Press notices (Eastern Daily Press, Eastern Evening News, Great Yarmouth Mercury, Beccles and Bungay Journal, North Norfolk News, Norwich Advertiser, Wymondham, Attleborough Mercury, Diss Mercury). • Notice on www.gndp.org.uk • Letter to representors • Letter to GO East • Sign-off Process 	Ruth Charles, Amy Baxter, Kim Woodhouse, Helen Bartlett, Helen Lambert, PSG Policy Group Broadland (Full council) City Council (Exec) South Norfolk (LDF) South Norfolk (Cabinet) Norfolk County Council (Cabinet)	08/07/2010 24/06/2010 06/07/2010 07/07/2010 07/07/2010 12/07/2010 12/07/2010
2.	Output 2: Consultation <ul style="list-style-type: none"> • Log of representations received • All representation logged in JDi 	Amy Baxter, Helen Bartlett, Ruth Charles, Helen Lambert, additional officers from districts	3 Sept 2010
3.	Output 3: Statement of representations and summary of issues raised	Roger Burroughs, Amy Baxter	17 Sept 2010
4.	Output 4: Copies of representations received	Kim Woodhouse, Amy Baxter	17 Sept 2010
5.	Output 5: Report on consultation Sign-off	GNDP Policy Group	23/09/2010

Brief – Consultation

Project Leads – Ruth Charles, Amy Baxter & Helen Lambert

		Broadland (Full Council)	28/09/2010
		Norwich City (Full Council)	28/09/2010
		South Norfolk (Full Council)	20/09/2010
		Norfolk County Council (Cabinet)	13/09/2010 or 11/10/2010