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Please ask for: Helen De La Rue
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Date: 12 September 2008

Dear Sir / Madam,

Re: Greater Norwich Development Partnership Joint Core Strategy for Broadland, Norwich and South Norfolk - Technical Consultation

Thank you for consulting the Assembly with regards to this matter.

The Regional Planning Panel Standing Committee considered the attached report at the meeting on 12 September 2008. The appendix to the report constitutes the Assembly's formal response to this consultation.

If you have any queries concerning this response, or any other issue relating to conformity with the Regional Spatial Strategy, please contact myself or James Cutting, Team Leader - Strategy & Implementation (01284 729434 or james.cutting@eera.gov.uk).

Yours faithfully



**HELEN DE LA RUE
ASSISTANT PLANNING OFFICER
STRATEGY & IMPLEMENTATION**

Regional Planning Panel Standing Committee
12 September 2008

Greater Norwich Development Partnership Joint Core Strategy for Broadland,
Norwich and South Norfolk - Technical Consultation

Report by Regional Secretariat

Purpose

To give a response to the Greater Norwich Development Partnership Joint Core Strategy for Broadland, Norwich and South Norfolk Technical Consultation.

Recommendation

The Standing Committee is asked to consider that the comments in Appendix A constitute the Assembly's response to this consultation.

1. Introduction

- 1.1 The Greater Norwich Development Partnership has invited comments on the Joint Core Strategy for Broadland, Norwich and South Norfolk Technical Consultation.
- 1.2 The consultation is open from 4 August to 26 September 2008. The consultation document can be found at:
<http://www.eastspace.net/gndp/DisplayArticle.asp?ID=8292>
- 1.3 A map of the area under consideration is included as Appendix B to this report.

2. Background

- 2.1 The Joint Core Strategy (JCS) is being co-ordinated by the Greater Norwich Development Partnership (GNDP), an association of Norwich City Council, Broadland District Council, South Norfolk District Council, Norfolk County Council and the Broads Authority, was formed in order to manage development and growth in the Greater Norwich Area.
- 2.2 The Greater Norwich Area (GNA) encompasses the Norwich Policy Area (NPA) and the districts of Broadland and South Norfolk, and covers a tract of 1495 km² (577 miles²). The GNA had a population of approximately 350,000 in 2001¹, a third of whom lived within the Norwich urban area. The towns of Aylsham, Diss, Harleston and Wymondham, and the Key Service Centres of Blofield, Brundall, Hingham, Loddon, Long Stratton, Reepham and Wroxham are important centres for population and employment. The remainder of the GNA is a rural area characterised by small market towns, villages and hamlets.

¹ <http://www.statistics.gov.uk/census2001/profiles/33.asp>

- 2.3 Norwich has been designated as a Key Centre for Development and Change and, as such, is a regional focus for housing, employment, retail, media, leisure, tourism, cultural, and educational development. The area was also designated as a Growth Point by the Government and will receive funds to support the anticipated growth. Norwich has a wide economic base and exerts a powerful commercial, social and cultural influence over the surrounding area.
- 2.4 The GNA is easily accessible by road and rail. There are a number of cycle routes in the area, including access to Sustrans National Route 1. Norwich International Airport provides internal UK links and services the European holiday charter business. Norwich City has waterway links to the Broads and the North Sea via the Rivers Wensum and Yare.
- 2.5 The ecology and landscape of the GNA are diverse, and include farmland (grades 2 and 3), grassland, heathland, marshland and reed beds. There are a number of important ecological sites, specifically Environmentally Sensitive Areas along the banks of the Rivers Tas and Yare, and a Special Area of Conservation adjacent to the River Wensum.
- 2.6 Policy H1 of the Regional Spatial Strategy sets a minimum target of 37,500 new homes to be built in the GNA between April 2001 and March 2021. Policy E1 assumes that at least 35,000 new jobs will be created by 2021.

3. Regional and Local Context

- 3.1 At a regional level, planning guidance for the Greater Norwich Area is contained within the adopted East of England Plan (May 2008), hereafter referred to as the Regional Spatial Strategy (RSS). The RSS replaces guidance previously contained within Regional Planning Guidance for the East (RPG6) and most of the policies in the Norfolk Structure Plan.
- 3.2 The Joint Core Strategy will replace the Broadland District local Plan (Replacement), which was adopted in 2006, the City of Norwich Replacement Local Plan, adopted in 2004, and the South Norfolk Local Plan, adopted in 2003.
- 3.2 In considering general conformity issues, EERA is required to review all Local Development Framework documents against the most recent version of the Plan. This assessment has therefore been carried out against all policies contained within the adopted RSS using the template in Appendix A.

4 Comments

- 4.1 The Issues and Options stage of the Joint Core Strategy was published for consultation in November 2007. A report was considered by the RPP Standing Committee on 1 February 2008. At that time, the consultation document did not raise any general conformity issues, though the GNDP were advised that further work was required in relation to locations for growth, and that consideration

should be given to sustainable development, deliverability, and to impact on funding possibilities for the necessary infrastructure.

4.2 The Technical Consultation Document contains strong illustrations of spatial vision and detailed descriptions of policies with clear and concise presentation. The DPD is supported by:

- Greater Norwich Employment Growth and Employment Sites and Premises Study;
- Greater Norwich Water Cycle Study – stages 1 and 2a;
- Greater Norwich Retail and Town Centres Study;
- Green Infrastructure Study;
- Norwich Area Transport Strategy;
- Norwich Growth Area – Infrastructure Need and Funding Study;
- Sustainability Appraisal Scoping Report; and
- Strategic Flood Risk Assessment.

Further planned studies include:

- Renewable Energy Study;
- Community Infrastructure Study;
- Strategic Housing Land Availability Assessment;
- Knowledge Economy Study; and
- Feasibility Study for a Concert / Convention Hall.

4.3 The GNPD anticipates provision of 47,500 new homes by 2026, and has identified three potential options for major development, each of which would provide 24,000 dwellings.

Location	Option 1	Option 2	Option 3
Norwich	4,000 new homes	4,000 new homes	4,000 new homes
Broadland	2,000 new homes	2,000 new homes	3,000 new homes
South Norfolk	2,000 new homes	2,000 new homes	2,000 new homes
Sproston and Rackheath area	6,000 new homes	6,000 new homes	6,000 new homes
Hethersett and Little Melton area	4,000 new homes	4,000 new homes	No significant development
Mangreen, Swardston, Mulbarton, and Swainsthorpe area	No significant development	No significant development	4,500 new homes
Wymondham	4,000 new homes	2,000 new homes	2,000 new homes
Costessey and Easton area	2,000 new homes	2,000 new homes	1,000 new homes
Long Stratton	No development	2,000 new homes	1,500 new homes

Implementation of any of these options is dependent on significant improvements to highway networks. Construction of the Norwich Northern Distributer Route and dualling of the A47 to the east of Norwich have been approved for delivery between 2011 and 2013. Whilst implementation of Option 1 would be consistent with regional policy, Options 2 and 3 would not be consistent as they rely on construction of a Long Stratton bypass on the A140. This scheme has been assessed as Priority 2 under the Regional Funding Allocation and has not been

approved for delivery, as it is currently considered to be of more local than regional importance, compared to other projects in the Region.

- 4.4 The Greater Norwich Development Partnership Joint Core Strategy for Broadland, Norwich and South Norfolk Technical consultation document is in generally conformity with East of England Plan with the exception of policy on the Code for Sustainable Homes Assessment, waste management, renewable energy, and prioritisation of use of brownfield land.

Policy 13 should be strengthened to include:

- Aims above minimum levels in the Code for Sustainable Homes;
- Guidance on waste management and construction waste; and
- Targets for use of energy from renewable sources.

5. Recommendations

- 5.1 The Standing Committee is asked to consider the comments in Appendix A as a basis for a response to the Greater Norwich Development Partnership Joint Core Strategy for Broadland, Norwich and South Norfolk Technical Consultation.

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APPENDIX A - LOCAL DEVELOPMENT DOCUMENT CHECKLIST

PART ONE – DOCUMENT INFORMATION

LOCAL PLANNING AUTHORITY	Greater Norwich Development Partnership
DOCUMENT TITLE	Joint Core Strategy for Broadland, Norwich and South Norfolk
DOCUMENT TYPE	DPD
DOCUMENT STAGE	Technical Consultation (Regulation 25)
CONSULTATION START DATE	4 August 2008
CONSULTATION END DATE	26 September 2008

PART TWO – GENERAL POINTS

QUESTION	ANSWER	COMMENTS
Does the area covered lie within the Eastern Region?	Yes	
Are all references to the East of England Plan correct?	Yes	The Consultation Document accurately cites the adopted RSS, but most of the supporting documents were published before May 2008 and refer to the previous version of the Plan.
Does the area covered include a key centre for development and change?	Yes	Norwich is identified as a Key Centre for Development and Change under policies SS3 and NR1. Norwich is a preferred location for strategic growth and a priority area for regeneration (SS5). The city has strategic importance as an employment site (E3), for business clusters in the media and life-science sectors (E4), as a retail centre (E5), for tourism (E6), as a historic city (ENV6), as an inter-regional transport node (T5), and as a transport investment priority (T15). The Norwich Northern Distributer Road has been identified as a strategic infrastructure scheme. Expansion of Norwich Airport and the associated economic development of the area are noted under policy E7.
Are there any key issues covered by the document that are of strategic or regional importance?		

PART THREE – CONSISTENCY / CONFORMITY CHECKLIST

QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Is there a clear drive for sustainable development?	SS1	Spatial Vision Spatial planning objectives Policy 1 – 9 Policy 12 - 18	Consistent. The document contains a clear illustration of the spatial vision for the GNA and detailed descriptions of policies to support sustainable development.
Is there a policy seeking to maximise the use of brownfield land and setting a minimum target of 60%?	SS2	Policy 2 Para 4.2 Appendix 1 – 3	There is no target for reuse of brownfield land. The consultation document states that “Numerous brownfield sites have been developed in recent years and some further opportunities remain. In the short term, a significant proportion of development will be focused on brownfield sites, but in the longer term there will be fewer available.” ² Significant brownfield regeneration is taking place along the banks of the river in Norwich and further schemes are planned. In relation to proposed options for housing development the consultation document states that “further contingency and flexibility will be provided by efforts to encourage further brownfield opportunities and bring forward larger sites more quickly”. Re-use of previously developed land should be prioritised to the fullest extent, as required by RSS policy SS2. Windfall brownfield sites should be developed to their maximum potential (where doing so remains consistent with other RSS policies) in order to protect the environment and landscapes.
Is there a clear pattern of development for key centres / and other urban and rural areas?	SS3 SS4	Policy 1 Policy 6 - 8 Policy 12	Consistent. Settlement hierarchy is clearly defined. The majority of new development will be focused on the Norwich urban area, followed by Main towns, key service centres, service villages and other villages.

² GNDP JCS for Broadland, Norwich and South Norfolk (August 2008) Policy 2, para 7.2

QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Is the East of England Plan employment target met?	E1	Objective 5	Consistent RSS employment targets are acknowledged. Objective 5 states that “Existing employment sites will be safeguarded and enough land for employment development will be allocated in line with the RSS”.
Is employment land protected?	E2	Para 1.3 Spatial vision Policy 2 - 6 Policy 15	The Norfolk County Council/EEDA/EERA Norfolk Employment Growth Study ³ , which included a section on the Norwich sub-region, was published in April 2005. Further information was obtained from the ‘Greater Norwich Employment Growth and Employment Sites and Premises Study’ ⁴ , which was carried out between October 2007 and February 2008 to identify and update the opportunities and measures required to encourage job growth. The GNDP anticipates investment at strategic and other employment locations will support and enhance the economy by sustainable means. The strategy for growth in the NPA includes substantial employment development at major growth locations, especially in the City Centre. Outside the City, local jobs are to be retained and improved.
Is the East of England Plan housing target met? Is there a 15 year plan for housing delivery?	H1	Policy 5	Provision is made for 47,500 new homes in the GNA by 2026. Of these, 7,500 homes have already been built and planning permission has been granted for a further 14,700. There are 3 potential options for major development (see table in section 4.2 of this report). Each would provide a total of 24,000 homes. However, options 2 and 3 are not consistent with regional policy: they propose provision of new housing at Long Stratton, which would be dependent on the construction of a Long Stratton bypass on the A140. This scheme has been assessed as Priority 2 under the Regional Funding Allocation and has not been approved for delivery, as it is considered to be of local rather than regional importance. Alternative sources of funding would be required if it is to be progressed.

³ <http://www.eera.gov.uk/Documents/About%20EERA/Policy/Planning%20and%20Transport/PlanHome/PlanTranStud/GeoStud/Norfolk/Norfolk%20Employment%20Growth%20Study%20-%20Report%20on%20Sub-Regions.pdf>

⁴ http://www.eastspace.net/gndp/documents/Greater_Norwich_Employment_Growth_and_Sites_&_Premises_Study_-_Combined_Final_Report_30_May_08.pdf

QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Is there an affordable housing policy and does it meet the East of England Plan target?	H2	Objective 4 Policy 14	Consistent. A target of 40% affordable housing is proposed on all qualifying developments. Provision of affordable housing will be required on sites of 5 or more dwellings in accordance with the needs assessment for the area. Exception sites may be considered for affordable housing where local need is demonstrated.
Is there policy to address the needs of Gypsies and Travellers?	H3	Policy 14	Consistent. Fifty eight permanent Gypsy and Traveller pitches will be provided by 2011, as recommended in the RSS Single Issue Review.
Is there a policy seeking to try and change travel behaviour?	T2	Spatial vision Objective 3 Objective 11	Consistent. There are objectives to encourage healthy and active lifestyles and to reduce the need to travel, especially by private car. Policy 16 encourages walking and cycling, proposes improvements to public transport within the City and main towns and between towns and Key Service Centres, and supports provision of IT links to facilitate of home working.
Is there a policy seeking to enhance provision for non-motorised forms of transport?	T9	Policy 13 Policy 16	The Norwich Area Transport Strategy (2006) ⁵ addresses accessibility, congestion, and the requirements for growth in and around the City. The strategy promotes traffic management measures for sustainable development, encourages travel choice, and fosters growth in the number of trips by means other than the private car, including public transport, in support of the cultural, economic, and social communities.
Are any major transport generators covered by appropriate policies?	E7, T12	Spatial vision Objective 5 Policy 2	Consistent. The Airport is highlighted for employment growth. A new business park associated with the airport is proposed, together with rapid transit bus routes and a railway station.

⁵ <http://www.norfolk.gov.uk/consumption/groups/public/documents/article/ncc049932.pdf>

QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Is the local road network addressed?	T8	Policy 16	<p>Generally consistent. Policy 16 addresses strategic access and transportation issues. The GNDP intends to promote improvements to public transport, including local and intercity rail services, and major road networks.</p> <p>Construction of the Norwich Northern Distributer Route and dualling of the A47 to the east of Norwich have been approved for delivery between 2011 and 2013. Both of these are required for the GNDP options for major development. Work on improvements to the A47 Postwick (A47 / A1042) Interchange and expansion of the existing park & ride site is due to begin in the near future.</p> <p>As noted above, construction of a Long Stratton bypass on the A140 has been assessed as Priority 2 under the Regional Funding Allocation and has not been approved for delivery.</p> <p>Aspects of improvements to the Area's transport systems are investigated in the Norwich Growth Area – Infrastructure Need and Funding Study (December 2007)⁶.</p>
Do any transport schemes promoted match regional priorities?	T15		
Is there a policy dealing with green infrastructure?	ENV1	<p>Policy 3 Policy 4</p> <p>Policy 17</p>	<p>Consistent.</p> <p>The need for improvements to the public realm, open space and green linkages is recognised in Policy 3. Green infrastructure and links between currently fragmented habitats and to the rural fringe will be protected, maintained and enhanced.</p> <p>The environmental assets of the GNA will be protected, maintained and enhanced. The Greater Norwich Green Infrastructure Strategy (November 2007)⁷ aims to promote sustainable development and support economic growth by providing accessible green infrastructure, promoting ecological networks and links, and improving access to habitats and green spaces, thus improving quality of life and helping to address climate change.</p>

⁶ http://www.eastspace.net/gndp/documents/Executive_Summary.pdf & http://www.eastspace.net/gndp/documents/Final_Report_-_Appendix.pdf

⁷ http://www.eastspace.net/gndp/documents/GNDP_GI_Strategy_Exec_Summary.pdf & [http://www.eastspace.net/gndp/documents/GNDP_GI_Strategy_Final\(1\).pdf](http://www.eastspace.net/gndp/documents/GNDP_GI_Strategy_Final(1).pdf)

QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Are landscape, wildlife & geological conservation covered by a policy?	ENV2 and ENV3	Policy 10 Policy 11 Policy 13	<p>Consistent.</p> <p>Although some greenfield land will be required for new developments, targeting brownfield land and integrating green infrastructure will protect biodiversity and the environment.</p> <p>Policy ENV2 affords the highest level of protection to the East of England's nationally designated landscapes including the Norfolk and Suffolk Broads. Within the Broads priority should be given to conserving and enhancing the natural beauty, wildlife and cultural heritage of the area, promoting public enjoyment and the interests of navigation. Policy 11 addresses this well.</p> <p>The Norfolk Biodiversity Action Plan presents studies of habitat and species and is supported by Biodiversity Supplementary Planning Guidance for Norfolk⁸.</p>
Is agricultural land and soils conservation covered by a policy?	ENV4	Policy 13	<p>Much of the rural area of Greater Norwich is grade 2 and 3 agricultural land. This area contains many attractive built and natural features including areas of notable landscape character, geological and biodiversity interest. Agriculture is an important aspect of the local rural economy. Although the need to protect the landscape is recognised, significant developments are proposed for rural locations.</p>
Are woodlands protected by a policy?	ENV5	Policy 13 Policy 19	<p>Generally consistent.</p> <p>The spatial vision states that Norwich will maintain its woodland and heathland. Secure arrangements for maintenance of green infrastructure, including woodlands, are proposed. Several woodland improvement projects are proposed and assessed in the Green Infrastructure Strategy.</p>
Are conservation and enhancement of the historic environment addressed?	ENV6	Spatial vision Objectives Policy 3 + 13 Policy 17	<p>Consistent.</p> <p>The GNA's rich historic heritage is recognised. The character and environment of the City of Norwich, the historical centres of the main towns, and characteristic features of villages and the countryside are all to be protected and enhanced.</p>

⁸ <http://www.norfolkbiodiversity.org/SAPsHAPs/Guidelines.pdf>

QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Is the achievement of a high quality built environment included addressed?	ENV7	Policy 13 Policy 19	There are requirements for high quality design and development, and efficient use of land and resources. However, the DPD should include policy requiring new development to aim above minimum levels in the Code for Sustainable Homes Assessments.
Is there is a policy dealing with the reduction of CO ₂ emissions?	ENG1	Spatial vision Policy 13	Generally consistent. There is an objective to minimise the contributions to climate change and address its impact, and Policy 13 states that "all development will be energy efficient and minimise carbon dioxide emissions".
Is there a policy dealing with renewable energy including the setting of a target?	ENG2	Spatial vision Objective 9 Policy 13	The Norwich Growth Area –Infrastructure Need and Funding Study (November 2007) ⁹ recognises the requirement for new supply stations and grid systems. Significant expenditure and work are proposed between 2011 and 2017. Although energy efficiency measures and use of energy from renewable sources are to be promoted, there is no target for renewable energy. A Renewable Energy Study is planned (Appendix 6). The JCS Sustainability Appraisal ¹⁰ states that there are currently no renewable energy sites in the GNA. ENG2 includes the aim that by 2010 10% of the region's energy and by 2020 17% of the region's energy should to come from renewable sources. This has been noted in the Sustainability Appraisal, but should also be reflected in Policy 13 of the JCS.
Is there policy ensuring water efficiency?	WAT1	Objective 9	Consistent. Efficient water management, including sustainable drainage systems, is a priority.

⁹ http://www.eastspace.net/gndp/documents/Final_Report_-_Appendix.pdf (Appendix F)

¹⁰ http://www.eastspace.net/gndp/documents/SA_SCOPING_REPORT_-_FINAL_VERSION_-_ADOPTED_DEC_2007.pdf

QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
<p>Are there policies dealing with integrated water management and with sustainable drainage technologies?</p> <p>Is there a policy dealing with flood risk management?</p>	WAT4	<p>7.12 7.14</p> <p>Policy 13</p> <p>Spatial portrait</p>	<p>The Infrastructure Need and Funding Study includes indicative costs and timing for water management required for proposed development schemes. It has been noted that new water supplies will be needed in Diss and Harleston to provide for proposed levels of growth.</p> <p>Development will be adapted to climate change and located to minimise flood risk.</p> <p>According to Environment Agency flood maps, most of the GNA is at minimal risk of flooding (less than 1 in 1000 year event), with the possible exception of land beside rivers and the Broads.</p> <p>Appropriate consideration has been given to flood risk in planning of locations for proposed development. A Strategic Flood Risk Assessment and a Greater Norwich Water Cycle Study - Stage 1 (November 2007)¹¹ have been prepared.</p>
<p>Is there a policy dealing with culture and leisure?</p>	C1 and C2	Policy 18	<p>Consistent.</p> <p>Continued attention to culture and leisure, including protection of existing assets and enhancement of the area's cultural heritage is intended. A Feasibility Study for a Concert / Convention Hall is planned (Appendix 6).</p> <p>The JCS should be used to form an overall framework for the delivery of cultural infrastructure with a clear expression on how developments will contribute to the delivery of buildings and programmes. This is particularly important for Norwich as a priority area for regeneration.</p>
<p>Are there policies dealing with waste management?</p>	WM1 – WM8	Objective 9 Policy 13	<p>Objective 9 states that “domestic and commercial waste will be minimised by encouraging waste reduction, reuse, recycling, composting and safe energy recovery”¹².</p> <p>Although waste is generally covered by County policy, it is important that appropriate references to waste management are included in policy for major expansion. Policy measures should also be introduced that support better</p>

¹¹ <http://www.eastspace.net/gndp/documents/introduction.pdf>

¹² GNDP JCS for Broadland, Norwich and South Norfolk (August 2008) Objective 9 (p22)

QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
			management of construction waste alongside statutory Site Waste Management.
Are there policies dealing with minerals?	M1	Policy 13	Generally consistent. Policy 13 requires that all development should protect mineral and other natural resources.
Are policies developed in accordance with policy for key centres for development and change?	NR1	All	Consistent. The status of Norwich as a KCDC is fully considered.
Are there any policies dealing with implementation and monitoring?	IMP1 and IMP2	Policy 19	Generally consistent. Policy 19 proposes that all development should be accompanied by appropriate infrastructure and secure maintenance arrangements will be established, and there is a commitment that quality of new development will be monitored through the careful scrutiny of Design and Access statements for all appropriate requirements. However, it is noted that this policy “is drafted on the assumption that the government introduces a Community Infrastructure Levy along the lines indicated in earlier published consultation papers. It will need amendment should the proposals be abandoned or substantially changed, and if necessary following the review of local government structures in Norfolk” ¹³ .

¹³ GNDP JCS for Broadland, Norwich and South Norfolk (August 2008) Policy 13 (p58)

PART FOUR – OVERALL ASSESSMENT

QUESTION	ANSWER	COMMENTS
<p>Is the DPD in general conformity with the RSS?</p>	<p>Yes</p>	<p>The Greater Norwich Development Partnership Joint Core Strategy for Broadland, Norwich and South Norfolk Technical consultation document is in generally conformity with East of England Plan with the exception of the areas detailed in Part 3 of the report.</p> <p>Re-use of previously developed land should be prioritised to the fullest extent, as required by RSS policy SS2.</p> <p>Policy 13 should be strengthened to include:</p> <ul style="list-style-type: none"> • Aims above minimum levels in the Code for Sustainable Homes Assessments; • Guidance on waste management and construction waste; and • Targets for use of energy from renewable sources. <p>In relation to the potential options for major development, implementation of Option 1 would be consistent with the RSS.</p>

APPENDIX B

Norwich Policy Area and Joint Core Strategy Area

(GNDP Joint Core Strategy for Broadland, Norwich and South Norfolk - Issues and Options consultation document – November 2007)

