

Joint Core Strategy for Broadland, Norwich and South Norfolk

Report of Consultation on Statement of Focussed Changes, August 2010

1. Introduction

- 1.1 Following an exploratory meeting in May 2010, Inspectors appointed to hold a public examination into the Joint Core Strategy for Broadland, Norwich and South Norfolk raised a number of issues. Some of these led to proposals to amend the JCS in a way which necessitated a period of public consultation.

2. Publication

- 2.1 A Statement of Focussed Changes was published and made available for comment from 19 July to 30 August 2010. Because 30 August fell on a Bank Holiday, an additional day, 31 August, was allowed for the receipt of representations.
- 2.2 The consultation was publicised via the local press, through Council Information Centres (including the Mobile Information Service) and by contacting individuals and stakeholders who had made representations at the pre-submission stage, and all Town and Parish Councils.
- 2.3 Advertisements giving notice of the forthcoming consultation went into the following local papers in July

EDP	2 July
Norwich Evening News	2 July
Great Yarmouth Mercury	9 July
Beccles Bungay Mercury	9 July
North Norfolk News	9 July
Norwich Advertiser	9 July
Wymondham Mercury	9 July
Diss mercury	9 July

Additional adverts were placed in all 8 local papers listed above in the week commencing 19 July and again in the week commencing 9 August.

3. Outcome

- 3.1 A separate comprehensive report itemising all representations received is available. This report attempts to summarise the main points made in relation to each of the focussed changes.

- 3.2 Although response forms were provided, many representations took the form of letters, without necessarily specifying a particular focussed change to which they relate, or specifying any specific remedy to overcome any perceived unsoundness.
- 3.3 It should be noted that, as a consequence, many of the comments made in relation to Policy 10, (Locations for major new, or expanded, communities in the Norwich Policy Area) were assigned to both the focussed changes relating to this policy (FC8 and FC9), and also to the focussed change to the appendix which elaborates the policy (FC10), unless the representations were very specifically directed towards one or other of the focussed changes. For this reason, the total number of submissions received is less than the sum of the representations attributed to each focussed change.
- 3.4 A second consequence of this arises because the database on which the original representations are stored requires entry of data in a field entitled "change to plan". In the case of many submissions by letter which did not suggest a specific change to the strategy, this field has had to be populated either by repetition of the body of the representation, or a statement that the text in the submission plan should be retained. Please note that in many instances, particularly in relation to the growth triangle, objectors are opposed to the principle of development, and the entry on the database should not be taken as an expression of support for the principle of development.

4. Summary of the responses to each Focussed Change

In the summary that follows, the main points made in respect of each focussed change are listed in a table alongside an officer response where appropriate. The full Statement of Focussed Changes document, as published for comment, is appended to the end of this report as Appendix 1a

4.1 FC1 Affordable Housing Policy (Policy 4) (Pages 1-2 in Statement of Focussed Changes document)

Representations received	
Total	22
Compliant	
Not compliant	5
Sound	2
Unsound	20

Main Issues raised	Officer response
No housing will be affordable given the	It remains Government policy to seek

Main Issues raised	Officer response
current economic climate and “sustainability” target set by the government and E. U. The country cannot cater for population growth as currently envisaged.	to secure a proportion of affordable housing on larger market housing sites
On the GNDP’s own evidence, the 40% target is unattainable on the majority of sites without subsidy. Even this is based on a piece of evidence which itself uses unreliable assumptions, and disregards the JCS policy aspirations to achieve code 6 of the Code for Sustainable Homes by 2015. The additional flexibility offered in the rewording of the policy is not sufficient to compensate for this.	Drivers Jonas Deloitte will be invited to defend their methodology While the study suggests that under a baseline (economically difficult) scenario, 30% of sites would be viable, 60% unviable, and 10% marginal, given the scale of affordable housing need, a policy which opts to forgo the potential contributions of 30% of sites is not considered appropriate, particularly when the policy explicitly includes flexibility to negotiate where viability is an issue. Furthermore, the study itself notes that where the majority of sites are likely to be greenfield, its viability conclusions may err on the side of pessimism. In the JCS situation this is likely to be a factor.
Oppose the variable thresholds. Believe growth locations should deliver the same proportion as other sites (and challenge the basis of the viability study)	Drivers Jonas Deloitte will be invited to defend their methodology
Criticism of the wording of the policy particularly the “rounding up” of the number of affordable houses where the percentage requirement would be 0.5, (objector argues 0.5 is less than half) and suggestion that the policy should state that “the number sought, <u>within each district</u> , may be reduced.....”	The suggested changes to policy wording are not considered necessary or helpful
Policy will reduce the opportunity for people to live on developments without a high proportion of affordable houses – this is discriminatory	It remains Government policy to seek to secure a proportion of affordable housing on larger market housing sites
Considerations of developer viability incentivise greenfield development	Drivers Jonas Deloitte will be invited to defend their methodology
Public subsidy should not be used to support affordable housing and therefore justify unviable development	It remains Government policy to seek to secure a proportion of affordable housing on larger market housing sites. In some instances public subsidy may be necessary to ensure

Main Issues raised	Officer response
	all sections of the community are adequately housed. Failure to do so could result in significant social problems.
Bilateral negotiation between developer and local planning authority over the quantity of affordable housing is an undesirable situation	It remains Government policy to seek to secure a proportion of affordable housing on larger market housing sites
Criticisms of the policy's evidence base in the form of the Drivers Jonas Deloitte report – see comments on that report	Drivers Jonas Deloitte will be invited to defend their methodology
Given that the study suggests that at baseline values, only 30% of scenarios would be viable with 40% affordable housing, policy target should have been set lower such that a majority of sites would be viable at the target rate.	While the study suggests that under a baseline (economically difficult) scenario, 30% of sites would be viable, 60% unviable, and 10% marginal, given the scale of affordable housing need, a policy which opts to forgo the potential contributions of 30% of sites is not considered appropriate, particularly when the policy explicitly includes flexibility to negotiate where viability is an issue. Furthermore, the study itself notes that where the majority of sites are likely to be greenfield, its viability conclusions may err on the side of pessimism. In the JCS situation this is likely to be a factor.
Accept that smaller developments may not be able to deliver 40%, but they should be compensated by higher target on large sites	40% has traditionally been viewed as the practical limit of what can be achieved without subsidy. The Drivers Jonas Deloitte evidence shows that achieving this level will be difficult on many sites.
New developments should include a wide range of tenures including co-housing	Noted but the policy does not preclude this
Provision of affordable housing in rural or semi urban areas is necessary but also dependent on locally accessible infrastructure	Agreed
No clear evidence supporting the graduated contribution from smaller sites. Evidence elsewhere suggests this is not a factor.	Drivers Jonas Deloitte will be invited to defend their methodology
Not legally compliant because of inadequacies in consultation process and relationship to policies of the previous Government, and potential for	Members decided in June that locally available evidence broadly supports the scale development proposed, notwithstanding the scrapping of the

Main Issues raised	Officer response
further consideration by Members means that the final form of any submission to the inspector cannot therefore be judged by consultees	RSS. This will be a matter for consideration at the examination in any event.
Government changes to planning system mean the strategy is no longer compliant with national policy	Members decided in June that locally available evidence broadly supports the scale development proposed, notwithstanding the scrapping of the RSS
Not justified because of inadequate consultation, and not effective because of uncertainty over infrastructure	The consultation on focussed changes exceeded the advice given by the Planning Inspectorate and the Government Office for the East of England. The examination will consider whether an acceptable level of certainty exists over infrastructure provision
Overall housing numbers still driven by now rescinded RSS.	Members decided in June that locally available evidence broadly supports the scale development proposed, notwithstanding the scrapping of the RSS
Unlikely to be public subsidy for affordable housing as referred to in policy FC1	The policy is not dependent on public subsidy, but states that where viability is at risk, the availability of public finance will be one of the factors taken into account alongside others such as reducing the proportion of affordable houses sought
Evidence report inadequate in its assessment of sensitivity to differing economic circumstances, and site specific issues, including local land values, and the higher standards required of eco community proposals in terms of infrastructure etc	<p>Drivers Jonas Deloitte will be invited to defend their methodology</p> <p>While the study suggests that under a baseline (economically difficult) scenario, 30% of sites would be viable, 60% unviable, and 10% marginal, given the scale of affordable housing need, a policy which opts to forgo the potential contributions of 30% of sites is not considered appropriate, particularly when the policy explicitly includes flexibility to negotiate where viability is an issue. Furthermore, the study itself notes that where the majority of sites are</p>

Main Issues raised	Officer response
	likely to be greenfield, its viability conclusions may err on the side of pessimism. In the JCS situation this is likely to be a factor. The proposed policy wording is more flexible to emphasise that site specific viability issues will be taken into account in terms of the proportion of affordable housing sought, and tenure split
Imposition of CIL on market houses only is unreasonable	The discussion on CIL reflects the current regulations, though it is accepted that the new Government may wish to revisit these
Challenge applicability of viability study models to scenarios where a longer-term more complex business model may be used / necessary	Drivers Jonas Deloitte will be invited to defend their methodology

4.2 FC 2 Affordable Housing supporting text
(Page 2 in Statement of Focussed Changes document)

Representations received	
Total	15
Compliant	
Not compliant	5
Sound	
Unsound	14

Many of the points raised echo those made in relation to FC 1. Additional specific points made in relation to this paragraph include the following:

Main Issues raised	Officer response
Target should not drop below 40%. If developers do not wish to fund 40% affordable homes they should not be allowed to build	While there is a need for affordable homes, and an ambitious target is justified, it is also important to remember there is a need for market homes as well
Comment on the limited value of housing needs assessments which form the basis for the target	The housing needs evidence followed government guidelines on the methodology prevailing at the time
Viability considerations are likely to	There is a limited land supply and

Main Issues raised	Officer response
<p>increase pressure for higher density. The assumptions in the report suggest this would increase pressure in Broadland. Notes housing pressure in Norwich combined with limited land supply – this will increase pressures in other districts</p>	<p>Norwich and this has been taken into account in assessing the scale of allocations across the strategy area. Density requirements in Norwich are not necessarily below those in other districts and in many instances are higher</p>
<p>The paragraph should not indicate that evidence shows a “significant” proportion of sites will be able to deliver the target. The assumptions made in the Drivers Jonas Deloitte report should be added to the JCS as an appendix for transparency and to assist future negotiations</p>	<p>The evidence base has been published, but it does not fetter discussions about the viability of a particular site. The evidence shows that in 30% of scenarios modeled, a site would be viable. While this is not a majority, it is still viewed as a significant proportion. Given the scale of affordable housing need, a policy which opts to forgo the potential contributions of 30% of sites is not considered appropriate, particularly when the policy explicitly includes flexibility to negotiate where viability is an issue. Furthermore, the study itself notes that where the majority of sites are likely to be greenfield, its viability conclusions may err on the side of pessimism. In the JCS situation this is likely to be a factor.</p>
<p>Not clear how the environmental standard of homes will be taken into account in assessing viability as stated in the paragraph. The study does not address adequately the impact of code level 6 on viability</p>	<p>The cost of building to any given code level currently in force, either as a consequence of national policy or JCS policy will be a factor in the assessment of viability. Where the environmental standard results from the application of JCS policy, there will be a judgment to be made between the policy aspirations for delivery of affordable homes and delivery of a low carbon environment. That judgment can only be made according to the circumstances at the particular time.</p>
<p>Doubts about viability mean the comprehensive spending review should be awaited and its outcome digested before the JCS proceeds</p>	<p>There is no obvious benefit to a delay on the basis of the comprehensive spending review. There will always be areas of uncertainty which planning has to recognise.</p>
<p>Oppose the use of public subsidy to build affordable homes – more</p>	<p>Suitable and affordable accommodation is seen as basic</p>

Main Issues raised	Officer response
appropriate to use it to enhance local infrastructure	human need and remains a high priority of the planning system.

4.3 FC 3 Affordable Housing supporting text, including overall plan wide affordable housing requirement
(Pages 3 – 4 in Statement of Focussed Changes document)

Representations received	
Total	15
Compliant	
Not compliant	4
Sound	1
Unsound	14

Again, many representations reflect those made in response to FC 1 and FC 2. Specific points made include the following:

Main Issues raised	Officer response
In terms of tenure, since strategic sites will be delivered over a long period, the short term requirement for 85% social-rented housing should not be imposed, and a proportion nearer to the 60% likely to be needed in the longer term should be applied	The existing backlog represents the current situation and needs to be tackled in the short term. It is the current backlog which is very heavily biased towards the need for social-rented rather than intermediate tenures
The threshold should be based on the national indicative threshold of 15 dwellings and not reduced to 5 in order that smaller sites can offer a more varied form of development	The scale of housing need, particularly in and near to Norwich, means that contributions will need to be sought from relatively small sites
There is a lack of transparency in the allocation mechanisms for affordable housing	A matter for housing rather than planning policy
Plan wide assessment of affordable housing should have policy status	Do not see this would add value. While instrumental in setting the policy framework, its value is more in helping to monitor the effectiveness of policies
Most recent housing assessments dates from 2006, which means they are approaching the end of their life, and were prepared before more recent updates in the recommended methodology.	It is recognised that the “shelf life” of the housing needs/market evidence base is limited. Such studies typically have a life of five years. This means the 2006 study remains valid, though towards the end of its life. The GNHP is proposing to commission an update of the evidence base likely to report in

Main Issues raised	Officer response
	2011 and develop it into a strategic housing market assessment which will ensure continued relevance. A statistical update produced in 2009/10 using new information on rents, house prices, incomes etc, and involving dialogue with key players in the housing market including agents, private landlords etc broadly confirms the earlier conclusions
The reference to a policy target of 40% is at odds with the policy where graduated approach for smaller sites is incorporated	Noted this is correct and the specific reference to 40% should be removed from the supporting text
Dispute the assertion that 40% is achievable in normal market conditions – argue this is only achievable in very good market conditions. Examples should be provided of where this has been achieved.	Until 2009, only Broadland had a target of 40%. Some examples from Broadland can be provided. The text does state that 40% is the “maximum” which can be achieved in normal market conditions.
The list of factors meaning target may not be reached should be extended to include factors such as necessary infrastructure provision and the lack of availability of public subsidy	It is not considered necessary. The potential for public subsidy may be a remedy. Infrastructure provision is a normal part of the development costs of a site
Target should be differentiated between different parts of the area	The evidence study does not support this conclusion
Disagree with the definition of affordable housing – the phrase “people in housing need” is too restrictive	The definition of affordable housing does reflect government guidance in PPS 3
Do not accept that short term target should differ from the long-term affordable housing need based on the government’s basic needs assessment model assuming the backlog in affordable housing need is eradicated over a five year period.	The evidence base for the housing market assessment did assume the affordable housing backlog would be eradicated over the next five years. Although that is not a specific requirement of Government guidance published in 2007, the advice on p52 is “the quota should be based upon meeting need over a period of five years, although longer timescales can be used.” However, there is no reference in that guidance to the basic needs assessment model. In light of this, the second sentence of the

Main Issues raised	Officer response
	<p>paragraph of 5.28 should be reworded to replace “the expectation of the Government’s basic needs assessment model.....” with “the expectation within government guidance”</p> <p>Negotiations on strategic sites would be expected to take into account the most up to date information available. If evidence in the future demonstrates that the initial obligation under section 106 relating to affordable housing is no longer relevant, it would be possible for the obligation to be renegotiated, or if the local planning authority refused, after five years challenged.</p>
One representation offers a different calculation of the likely long term affordable housing need	Noted, but not considered any more valid than that in the focussed change
FC. 3 does not adequately reflect the reworded policy’s commitment to take full account of viability issues	Supporting text in FC 2 should be read in conjunction with this paragraph. FC 2 is explicit about the need to take viability issues as well as housing needs assessments into account
Oppose the consequence of the strategy that need arising in one area will be met in another.	Housing markets do not respect political boundaries, and this applies just as much to the private housing market as to intermediate tenures and social-rented housing pressures

N. B.

The response to two of the representations suggests slight changes of wording to FC 3 paragraph 5.28B. **These have been shown in bold text in the table above**

4.4 FC 4 Affordable Housing supporting text, including expected contribution from “exceptions sites”

(Page 4 in Statement of Focussed Changes document)

Representations received	
Total	3
Compliant	
Not compliant	3
Sound	
Unsound	3

Main Issues raised	Officer response
The forecast contribution from exceptions sites is noted. Whilst these can not be taken into account as part of housing provision, once completed they should be recorded and counted as part of the affordable housing delivery for monitoring purposes	Agreed – they are counted in this way

4.5 FC 5 Gypsies and Travellers Policy (Policy 4)
(Pages 4 – 5 in Statement of Focussed Changes document)

Representations received	
Total	8
Compliant	
Not compliant	3
Sound	
Unsound	8

Main Issues raised	Officer response
The evidence base which gave rise to the RSS targets is still extant and should be taken into account. This includes assessing future growth on the basis of a compound 3% per annum rate. Do not understand why the longer-term target based on this growth has been rejected. If the policy is to change the policy and accompanying text should state how and when such updating will be carried out and indicate how provision will be made post 2011. This should include transit sites	The authorities generally accepted the scale of growth proposed by the RSS until 2011. This was in spite of the fact that the evidence base behind the RSS produced two scenarios. The first of these was based “purely” on evidence and the second involved some redistribution to avoid the peaks and troughs in requirement which would have followed the “pure” approach. In the second approach, the one which gave rise to the RSS targets, the targets for Norwich and Broadland both exceeded the “pure” evidence based target. Both councils accepted a degree of redistribution in this way as a matter of equity and to assist delivery, but neither saw this as a justified approach for extrapolating long term targets and both responded to this effect at the point where the Secretary of state consulted on the draft RSS alteration. It may well be therefore that revised targets are lower, but it would be wrong for the strategy to make this assumption without having done the necessary local research.

Main Issues raised	Officer response
<p>There is no indication the number of permanent residential sites will be substantially different from the previous version. If it is to be fewer the policy should say so</p>	<p>It may well be that revised targets are lower, but it would be wrong for the strategy to make this assumption without having done the necessary local research.</p>
<p>A simple commitment to update based on new evidence lacks clarity</p>	<p>In response to criticisms of other focussed changes, the point has been made that the GNHP is preparing to refresh housing requirements evidence and expand it into an updated housing market assessment. In parallel with this the GNHP is proposing to undertake or commission local research to assess future requirements for Gypsies and travellers. This should ensure a timely update of the evidence base.</p>
<p>Concern about the suggestion that after 2011 pitches will be provided in association with large-scale housing growth</p>	<p>The focussed change states some of the allowance to be provided after 2011 is expected to be provided in association with large scale strategic housing growth. With regard to residential pitches, the same broad locations would be appropriate in terms of the availability of social infrastructure such as schools, health care facilities etc and similar environmental considerations leading to the choice of development locations would appear to apply to housing and other forms of residential provision.</p>
<p>Strategy fails to pay adequate regard to the management implications of site provision</p>	<p>Do not accept that such details are appropriate for a core strategy. They would be more appropriate in site allocations or development management development plan documents</p>
<p>Concern that mobile home provision is only considered in relation to Gypsies and travellers. Representation promotes mobile homes as low impact homes which have the ability to be moved should locational criteria change.</p>	<p>The policy requirement is specifically directed to Gypsies and travellers. If part of the provision for the settled community were to be met through the provision of mobile homes, it would be considered through the normal planning process.</p>

4.6 FC 6 Gypsies and Travellers supporting text
(Page 6 in Statement of Focussed Changes document)

Representations received	
Total	2
Compliant	
Not compliant	2
Sound	
Unsound	2

Main Issues raised	Officer response
No issues specified	No response

4.7 FC 7 Travelling Show people supporting text
(Page 6 in Statement of Focussed Changes document)

Representations received	
Total	3
Compliant	
Not compliant	2
Sound	
Unsound	3

Main Issues raised	Officer response
<p>The evidence base which gave rise to the RSS targets is still extant and should be taken into account. This includes assessing future growth on the basis of a compound 3% per annum rate. Do not understand why the longer-term target based on this growth has been rejected. If the policy is to change the policy and accompanying text should state how and when such updating will be carried out and indicate how provision will be made post 2011. This should include transit sites</p>	<p>The authorities generally accepted the scale of growth proposed by the RSS until 2011. This was in spite of the fact that the evidence base behind the RSS produced two scenarios. The first of these was based “purely” on evidence and the second involved some redistribution to avoid the peaks and troughs in requirement which would have followed the “pure” approach. In the second approach, the one which gave rise to the RSS targets, the targets for Norwich and Broadland both exceeded the “pure” evidence based target. Both councils accepted a degree of redistribution in this way as a matter of equity and to assist delivery, but neither saw this as a justified approach for extrapolating long term targets and both responded to this effect at the point where the Secretary of state consulted on the draft RSS alteration.</p>

4.8 FC8 Locations for major new or expanded communities in the Norwich Policy Area (Policy 10)

(Page 7 in Statement of Focussed Changes document)

Representations received	
Total	167
Compliant	
Not compliant	11
Sound	6
Unsound	161

Please note – many of the representations relating to FC8 took the form of letters with a standard wording. Many copies were received of two such letters with slight variations in wording, but making similar points. These put forward a number of specific objections as detailed in the first row of the table below.

Main Issues raised	Officer response
<p>The change in status from a broad location of growth to a “strategic allocation” has been introduced at a late stage without adequate time for proper consideration of a detailed concept statement. There have been no public exhibitions or meetings on the proposals to enable people to find out more.</p> <p>Re- designation as a “strategic allocation” is intended to speed up the planning process and avoid the requirement for a public examination</p> <p>Concerned about direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on maps in the concept statement. Not convinced the unconstrained land can accommodate the proposed number of dwellings, and therefore some land identified as having environmental constraints would be sacrificed a development, or require the reduction in number of dwellings.</p> <p>Object in principle to the proposed development of up to 10,000 dwellings based around NNDR – loss of</p>	<p>The primary motivation for seeking to progress the growth triangle as a strategic allocation is to speed up preparation of a planning framework to guide new development. This is prompted by the lack of a current five year supply of housing land and the consequent risk of the Council being forced to consider planning applications on an ad hoc basis. It is true that such a process would not require an independent public examination of the kind which would be required for an area action plan, but it would not negate the need for public engagement. The Council must consider whether this approach is consistent with the Government’s localism agenda. In terms of the capacity of the triangle, in particular the unconstrained land, to accommodate the scale of development proposed, a high level assessment has been undertaken. This suggests that it would be possible to accommodate the scale of development proposed on unconstrained land, though it should be acknowledged that that is unlikely to produce the best layout, and a</p>

Main Issues raised	Officer response
<p>countryside and traffic consequences</p>	<p>more sustainable urban form would be likely to result from some development being accommodated on land which has been highlighted has constrained in some way. In this respect, it is fair to point out that not all constraints of equal significance. At one extreme, it is clearly impossible to relocate Ancient Woodland, while on the other it is relatively easy to relocate green space currently used as playing fields. Historic parkland should be protected, but may be able to offer the potential for extremely attractive informal recreation space to serve the growing communities and secure its future management. Similarly, while development should not be allowed to compromise the biodiversity value of County Wildlife Sites, detailed investigation may indicate some parts are less sensitive and could accommodate development. Landscape value is a local designation, rather than a national one, and some parts may be “tradeable” in the context of well designed development. The high level assessment of development potential in the growth triangle is presented as a background paper.</p>
<p>The argument that it is necessary to speed up plan making process is at odds with the District Council’s Cabinet’s conclusion in June that the Council should take a step back and take stock until such time as the direction the new government proposed to take became clear. Given the District Council’s decision to delay consultation on site-specific work, the proposed changes to FC8 are unjustified</p>	<p>The decision to rescind the RSS was a consideration in Broadland’s decision not to progress consultations on site specific allocations, because it was necessary for the JCS to give certainty over the future scale of development. However once the certainty is restored it will be necessary for a more detailed framework to be put in place quickly. Members need to consider if there is a stronger argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind and whether this should follow the AAP route (or any replacement process introduced by the new Government) so that more</p>

Main Issues raised	Officer response
	formalised examination will be undertaken.
<p>The proposed change unjustifiably changes the status of the entire triangle from one where development might be possible in principle in some locations and instead creates a single blanket site allocation without adequate protection for areas of environmental importance. It does not first establish whether such growth is deliverable or represents the most appropriate strategy for development taking into account there is no “plan B.” In effect therefore, it puts delivery ahead of other key objectives of the core strategy, and, because it would establish the principle of development across the entire area, the area is more likely to be subject to piecemeal development.</p>	<p>Coordination of infrastructure, including transport infrastructure was one of the reasons why the AAP approach was initially favoured. Given the likelihood of urgent development pressures in relation to housing land supply, a strategic allocation and SPD approach which could be put in place relatively quickly was seen as a pragmatic approach to achieving such coordination.</p>
<p>Oppose growth to the north east – transport and employment are better in the south</p>	<p>The overall scale of development, principle of an urban extension in the north east, role and deliverability of the NDR, are fundamental to the JCS and will be considered at the examination</p>
<p>NDR funding and delivery not guaranteed</p>	<p>Deliverability of the NDR is fundamental to the JCS and will be considered at the examination</p>
<p>A number of letters made specific points objecting to the inadequacy of consultation, particularly during the holiday period. Many make points about the inadequacy of the form provided for responses. SPD status would enable the Council to make changes to future plans without further public consultation. This is contrary to the new Government’s emphasis on localism.</p>	<p>The timetable of consultation response to that set by the inspector for the public examination of the Joint Core Strategy. A longer period of consultation was not practical in that context within the current JCS process.</p>
<p>Changes to the plan making system made/proposed by the Government should give an opportunity for complete reappraisal.</p>	<p>The only significant change made by the new Government in plan making has been a decision to rescind the RSS. Members have already taken the decision to carry on preparation for the examination on the basis of</p>

Main Issues raised	Officer response
	other sources of evidence on future housing requirements
The proposal indicates inadequate emphasis is being placed on the environmental protection, particular reference to the risk to mature trees	The concept statement commits the council to undertaking an appropriate assessment under the Habitats Regulations. The regulations themselves would prevent development proposals which would have an adverse impact on Natura 2000 sites without adequate mitigation
Some respondents appear to refer specifically to the recent “charette” held by landowners concerning Racecourse/Belmore/ Browns plantations. While the representations may have been prompted by a specific event organised by the landowner, rather than the focussed changes document, they have been included since they clearly express concerns about the way future development within the growth triangle will be handled.	As the charette was not part of the focussed changes, this is a matter for note.
Area covered by the policy has been extended	The area covered is the same as that shown on appendix 5 of the submitted JCS
Respect for environmental designations would leave the Rackheath proposal as free standing and isolated from the remainder of the urban extension as well as by the NDR. This will not be “permeable” even if attractive routes can be made possible in daylight hours – they will not be attractive after dark from the security angle.	There is no reason why a coordinated development should not include areas of open space. The urban form could be enhanced by appropriate corridors providing ecological connectivity

Main Issues raised	Officer response
<p>There is no evidence that the NDR represents the best transport strategy for this area. Strategic allocation status would avoid the need for an independent examination, contrary to paragraph 6.1 of PPS 12</p>	<p>The role of the NDR will be considered in the examination</p>
<p>Rackheath would be largely served by Wroxham Road and Salhouse Road. Object to the additional traffic passing across Mousehold Heath</p>	<p>Transport proposals including the potential for a BRT route crossing Mousehold Heath will be considered at the examination. It is quite possible that measures to create bus priority on this route could reduce existing traffic flows</p>
<p>The growth triangle should be retained as an area action plan in view of the conclusions of the February, 2010 appropriate assessment regarding potential cumulative and in combination effects of the JCS on water resources, water efficiency, growth and tourism. The efficacy of mitigation measures can only be established through examination of detailed proposals. If the proposals cannot demonstrate effective mitigation of impacts the development will not be able to go ahead. The complexity of the unresolved issues go beyond the scope of a SPD. Therefore the approach is unsound.</p>	<p>It is in recognition of the complexity of environmental issues that the concept statement includes a commitment to Sustainability Appraisal and an Appropriate Assessment under the Habitats Regulations even though these would not automatically be necessary for an SPD</p>
<p>Given the need to secure the highest standards in terms of the water environment, currently supported in the case of Rackheath by the Eco towns supplement to PPS 1, there is concern that if the new Government were to rescind that policy statement, the SPD would give less opportunity than an AAP to introduce sufficiently stringent policy requirements to ensure development meets the standards currently proposed.</p>	<p>The default position would be that set out in the JCS policy covering energy and water efficiency</p>
<p>Concerned that the SPD will not offer the same certainty of a coordinated approach to transport infrastructure</p>	<p>This view has been expressed by the Highways Agency. The concern is understood but the SPD route is intended to enable planning framework to be put in place quickly once the overall scale of development and spatial strategy has been established through JCS process.</p>

Main Issues raised	Officer response
	Nevertheless, in view of the fact that many landowners/prospective developers have chosen to submit individual responses, Members need to consider if there is a stronger argument for the additional certainty an AAP might confer, and weigh that against the likelihood it would take longer to deliver in a time when applications in response to the limited land supply can be expected.
Eco Town was imposed by the Government	<ul style="list-style-type: none"> ○ The proposal for an eco community was supported by the District Council and GNDP but not on the basis that it would increase the scale of development, but that it would result in higher environmental standards with additional costs supported by central government funding
Local views and expressed responses to earlier consultation have been disregarded	This is not accepted. It has to be acknowledged, however, that any strategy involving large-scale growth is likely to arouse opposition in some quarters
Object because of impact of growth triangle on Wroxham (and proposals for Wroxham) contrary to express wishes of local residents	The proposals for Wroxham and any potential impact that the growth triangle may have will be matters which can be considered at the examination
No consultation on growth point status	Growth point status did not determine the scale of growth proposed for the area. That was initially established through the RSS before growth point status was considered.

4.9 FC 9 Locations for major new or expanded communities in the Norwich Policy Area (Policy 10)

(Page 7 in Statement of Focussed Changes document)

Representations received	
Total	148
Compliant	
Not compliant	11
Sound	2
Unsound	146

Main Issues raised	Officer response
Given that FC8 and FC 9 are complementary rewording to two different parts of the same policy, it is understandable that many of the points made are common to both, and the points made above have also been made to FC 9.	The same responses apply to the points raised in respect of FC8
Policy is inflexible in that it does not pay adequate regard to the need for/potential of smaller sites in and adjacent to Rackheath but outside the current eco community proposal. It therefore fails the test of soundness. Policy should have made provision for such sites to come forward independently of the large scale proposal. Detailed policy working to address this is suggested. "A single coordinated approach will be required to deliver strategic levels of growth across the whole area. More detailed masterplanning will be required for each quarter. Small sites and non strategic growth will be permitted at Rackheath when it can be demonstrated that development would not prejudice the delivery of the Eco community proposal and that it can be accommodated within existing or expanded infrastructure capacity limits. Such sites will help to deliver the Broadland "small sites" in the NPA requirement (2000 homes)..... "	There is no reason why small sites if appropriate could not be included in the masterplanning exercise provided they made appropriate contributions to infrastructure. This should, however, be achieved by a coordinated approach across the area
Objection to the reference to "a single coordinated approach will be required across the area. More detailed masterplanning will be required for each quarter". Objector (prospective	The idea of a "single coordinated approach" to the strategic planning of the area is fundamental to the SPD and should not be written the out of the policy

Main Issues raised	Officer response
developer) nonetheless supports the need for coordination and remains committed to working with other landowners and the Councils. The words criticised are believed to lack clarity	
Oppose the principle of strategic allocation as this would limit future community involvement – believe this would be used to set a precedent for development across the entire Greater Norwich area, contrary to the Government’s localism agenda	The principle of the strategic allocation could not be applied elsewhere unless confirmed through the JCS
Further detailed criticism of the significance, the role and reliance on the NDR and Postwick Hub, arguing that the latest announcements on these schemes cast yet more doubt on their deliverability	NDR issues will be debated at the examination

4.10 FC 10 Appendix 5, concept statement for growth triangle
(Pages 9-28 in Statement of Focussed Changes document)

Representations received	
Total	174
Compliant	
Not compliant	12
Sound	2
Unsound	172

Given that FC8 and FC 9 are complementary rewording to two different parts of the same policy, and the concept statement at FC 10 elaborates these, it is understandable that many of the points made are common to all 3, and the points made above have also been made to FC 10. However, in making comments on the FC 10, many have elaborated their reasoning in respect of the contents of the concept statement.

Main Issues raised	Officer response
Criticism of the NDR proposal including too far out, encouraging infill building, insufficient regard to historic parkland and Ancient Woodland, inadequate funding and uncertain delivery	The principle of the NDR will be debated at the examination. There may well be further public inquiries at the planning application stage looking at more detailed matters of alignment. The fact that, in the wider interest a route for a major piece of infrastructure crosses historic park

Main Issues raised	Officer response
	land does not imply that all historic park land, even locally designated, is without environmental value
<p>Support the concept of detailed master planning for the northeast, but; concern about the reliance of the policy on the uncertain provision of the northern distributor road; .statements in the concept statement linking the delivery to a commitment to providing NDR need to be more thoroughly tested; detailed criticisms Include incomplete references to county wildlife sites (Para 6); reference to increased visitor pressure on habitats should refer instead to pressure on species (Para 7); needs to more explicitly refer to water quality as an issue for appropriate assessment; concern about the uncertainty of delivery of water infrastructure (Para 14); support the vision for multifunctional network of greenspaces and stress the current deficiency (detailed guidance available from the Natural England website) (page 13); concern that recent “charette” promoted by landowner indicates there will be in difficulties in delivering some of the policy aspirations in the concept statement (Para 18);while multifunctionality should be a general aspiration, some land needs to be specifically reserved for biodiversity benefit (Para 20); endorse the assumption that opportunities to exceed the minimum open space must be taken (Para 33); need to incorporate more robust wording linking phasing of development to provision of the infrastructure (Para 43). These issues need to be resolved at the Joint Core Strategy stage.</p>	<p>The NDR is seen as fundamental to accommodating development on this scale. This will be a matter for debate at the examination. Accept need to check and verify references to County Wildlife Sites, though the concept statement was not intended as an audit of all specific citations. While the water issue, specifically the potential impact of abstracting more water to accommodate growth and means to avoid adverse impact are highly relevant and will be considered at the examination, this is an overall issue rather than one which relates specifically to the growth triangle. The recent “charette” clearly indicates the challenges around accommodating development without detriment to existing environmental assets. The charette was not promoted by the local planning authorities but has clearly raised alarms within the local community, and, it appears, with Natural England. The reference to linking development to provision of infrastructure has been a regular feature of discussions with Natural England. It is very difficult at the core strategy stage to give the degree of precision which Natural England seeks. The wording as drafted is considered to be appropriate for a core strategy, particularly as the concept statement specifically requires (Para 52) sustainability appraisal, habitats regulations assessment and health impact assessment, even though these are not automatic requirements of SPD.</p>
<p>Dispute the assertion that there is capacity for 4000 properties within existing sewers (Para 14) water cycle study planned for the eco community will identify and addressing the network</p>	<p>This was one of the outputs of the water cycle study in which Anglian Water participated, and it is a matter of concern that they express this reservation. Updated position</p>

Main Issues raised	Officer response
issues	statements are being sort from Anglian Water, Natural England and the Environment Agency in the light of the completion of the Environment Agency's review of consents. Although this is primarily concerned at this stage with adequacy of water sources in relation to the River Wensum SAC, this will provide an opportunity to explore this.
Specific objections to proposals promoted through the recent "charette" promoted by a landowner in the area	This was not promoted by the local planning authorities but has clearly raised concerns among local residents who may be more difficult to reassure if the SPD route is followed.
Does not comply with the Government's green paper, Open Source Planning and its emphasis on plans responding to local people's views, to have consultations inviting comment on draft documents, rather than taking public views into account and building the document up from the foundation of local views	While the thinking behind the comment is understood, the Government has made no changes to the planning system other than a decision to rescind the RSS. To date the process governing local development framework preparation remains unchanged. Furthermore, the Government has expressly indicated that it seeks to increase rates of house building, and one of its principal criticisms of "top down targets" is the failure to deliver the desired rate of building. Under these circumstances seeking to undertake a complete review of the JCS would be counterproductive. However in terms of how to proceed from here, Members need to consider if there is a stronger argument for a more community focussed building of the detailed plans once the JCS has established principles.
Access considerations to the wider area mean the south and west is better connected, and as a consequence many facilities (UEA, hospital etc) are located in that part of the Norwich area	The overall pattern of growth will be tested at the Examination
Forecasts following RSS targets are largely self fulfilling i.e. provision of houses will lead to migration	Notwithstanding previous levels of development, there is still evidence of housing stress. PPS 3, published by the current government indicates the

Main Issues raised	Officer response
	kind of evidence needed to justify locally derived targets. The available evidence tends to support the broad scale of growth being proposed.
Dispute the value of NDR to NATS, and challenge prospects of delivery	This will be debated at the examination
Employment areas such as Broadland Business Park have access to the southern bypass and are not dependent for their success on new housing nearby	The proposals are intended to contribute to meeting the overall housing requirement in the area, but in terms of location, proximity to major employment areas such as Broadland Business Park is clearly a benefit
Plans in concept statement do not show all current planning proposals (Brook Farm)	The plans in the concept statement do not show current planning proposals. They show existing commitment including local plan allocations.
General support but wording in paragraph 47 needs to be clarified. As drafted it states that “any development beyond existing planning permissions and allocations and an exemplar scheme at Rackheath would be dependent on the provision of [an orbital link between Sprowston fringe and Broadland business park]” This is something over which the developers at Rackheath are likely to have no control, and as drafted, this limitation would still apply even if the NDR were already in place. (prospective developer)	This is a fair point, and if the focussed change is submitted, redrafting of paragraph 47 to avoid this anomalous position would be appropriate
General support but identification of issues which need to be addressed these include: relationship between different types and scales of plans: clarification of all future appraisals and assessments: is Rackheath really so much of an exemplar while at an embryonic stage?: evidence underpinning 2000 units limit before NDR: employment land distribution: housing types too prescriptive: effects of development on historic parkland is too hard line: infrastructure still needs greater definition (prospective developer)	Relevance of NDR, and ability to accommodate development before it is likely to be debated at the examination. In many ways the representation illustrates the challenge of producing the concept statement. Many prospective developers seek to increase flexibility, while many residents and environmental bodies seek to reduce flexibility and create greater certainty. Overall, the concept statement is still considered to strike the right balance. It is important to stress that the concept statement does not include proposals maps as of this would infringe upon the SPD/masterplanning process which would need to be undertaken in consultation with all interested parties.

Main Issues raised	Officer response
	<p>Instead it seeks to highlights constraints which will need consideration, and the potential offered by unconstrained land. In response to questions raised by the inspector it may be advisable, if the focussed changes are submitted, to clarify the status of some of the constraints illustrated and highlight the fact that not all are absolute. Members need to consider if there is a stronger argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind.</p>
<p>Detailed criticisms including suggestion to add “as part of the planning application process” to the end of paragraph 1: need for more clarification about how the coordinated approach will enable achievement of objectives: paragraph 17 remove sentence referring to the Rackheath concept statement that emphasises the need to prepare a SPD in partnership between local community, landowners and developers to define the quarters: paragraph 24 dealing with locally generated energy should be deleted: paragraph 31 should be amended to take a longer view of the split of tenures for affordable housing: paragraph 33 fifth bullet point delete “further”: paragraph 33 sixth bullet point delete final sentence which states the opportunities to exceed minimum open-space/green infrastructure requirements should not result in a reduction in other categories: paragraph 43 indicate that the quantum of development that can be achieved should be informed by the detailed modelling and innovative strategies towards non car modes – as a consequence paragraph 44 which emphasises the role of the NDR in the transport strategy can be deleted: paragraph 51 amend wording to omit reference to other members of the Greater Norwich Development</p>	<p>The comments include a number of detailed wording suggestions, some of which may be acceptable but in other areas however may raise concerns. Omitting reference to locally generated energy would be undesirable. Paragraph 30 does take a long view of affordable housing tenure split. It is important that all categories of green space are provided, and one should not be at the expense of another. The need for the NDR to accommodate the scale of development proposed will be debated at the examination. The limitation of masterplans to the planning application process is not accepted. Paragraph does not preclude this but there is no reason why masterplanning should not take place ahead of the preparation of planning applications.</p>

Main Issues raised	Officer response
Partnership, specifically refer to infrastructure providers but omit separate reference to the public: paragraph 53 at the end of first sentence add “ as part of the process of preparing planning applications” (prospective developer)	
Objects to the changes to the process which would deny people the opportunity to challenge detailed proposals at a public examination	The primary reason for proposing the strategic allocation and SPD route was to enable a planning framework to be put in place quickly to deal with anticipated pressures in the light of the need to demonstrate a five year housing land supply – still a requirement of the present Government. There is no intention to avoid public consultation, but it is true that the process would not involve a further public examination. That is the reason for a relatively detailed concept statement, but Members will need to weigh this argument in the balance in deciding whether to submit the focussed change
Oppose the emphasis on developing farmland, probably the most important natural resource we have, need for food security means all existing brownfield sites should be developed before any new greenfields. Others express similar sentiments about woodland, open spaces, historic parkland etc	Proposals to develop Greenfield sites, where the agricultural, Woodland or other forms of undeveloped land are not lightly made. However the scale of development required to meet the forecast need means that it cannot all be accommodated on previously developed land.
Would set a precedent which could be followed elsewhere in the GNDP area contrary to the Government’s localism agenda	It would not –purpose of the focussed changes is to identify the area of a strategic allocation which differentiates it from other proposed locations
The concept statement is not sufficiently clear about the role of retail in district centres. A number of detailed changes are suggested to add more explicit references including: paragraph 1 first sentence: second sentence of vision: in objectives, under services, first bullet point: paragraph 32 first sentence: paragraph 32 final sentence needs to be reworded to make clear that the	The objection proposes a number of detailed wording changes. Some may be considered acceptable.

Main Issues raised	Officer response
<p>district centre will need to be accessible to existing neighbourhoods as well as new quarters within the growth triangle</p>	
<p>Concern about democratic impropriety resulting from consultation in the holiday period, and the fact that an SPD would not involve further public consultation. Also concerned about reports of local woodlands being considered for development. Support wider spread of more small scale development around the county.</p>	<p>The timescale was largely dictated by the need to proceed to an examination in November. There is no intention to avoid public consultation, but it is true that the process would not involve a further public examination. That is the reason for a relatively detailed concept statement, but Members will need to weigh this argument in the balance in deciding whether to submit the focussed change. The issue of local woodlands derives from the developer promoted “charette”. The overall strategy within the strategy area will be considered at the examination, but it is not possible to commit additional development in other parts of the county.</p>
<p>It is unreasonable to introduce a 19 page concept statement and to deny people the opportunity to add to their original representations. There is a need for more profound public engagement than has been offered.</p>	<p>People were invited to comment on the focussed changes. By definition, the original representations did not concern the focussed changes as these had not been published. The original representations will still be considered by the inspectors. The scale of the concept statement was dictated by the desire to strike a balance between offering flexibility and clarity. Clarity is generally sought by residents and can only be offered through a degree of detail which means a relatively lengthy document.</p>
<p>Capacity of the triangle to accommodate development without encroaching on environmental assets has not been demonstrated</p>	<p>There has been a high level attempt to assess the capacity in the form of an informal “land budget”; this is available as a background paper</p>
<p>No evidence to show that reliance on NDR is compatible with reducing reliance on private car, promoting public transport, walking and cycling. In any event, delivery of NDR cannot be relied on (drawing on correspondence</p>	<p>The necessity, role and function of the NDR will be debated at the examination, along with its prospects for delivery.</p>

Main Issues raised	Officer response
<p>between Government and Norfolk County Council) similarly there is now doubt over the Postwick hub (also based on correspondence between Government and Norfolk County Council)</p>	
<p>Paragraph 10. Cannot regard NDR as part of the baseline as it has not yet been built. County council has not committed plans to delivering any large-scale changes in the reallocation of road space, and the proposals map in appendix 5 (constraints and opportunities) shows only a single BRT route. Paragraph 44 Not justified -- there is no clear evidence to show the NDR is needed to solve the existing transport problems in Norwich. Reliance on the NDR for a major component of the JCS allocations means that JCS is unsound because of the risks to delivery of the NDR, compounded by the lack of any indication where else that development might be accommodated. There should be an examination of alternatives including accommodating growth to the northeast of Norwich without an NDR, and alternative locations for growth.</p>	<p>The necessity, role and function of the NDR will be debated at the examination, along with its prospects for delivery.</p>
<p>Paragraph 31 housing type and tenure is fundamentally flawed because of the failures in the underlying basis for the 40% affordable housing requirement which apply to the whole strategy. The same objector has challenged the affordable housing viability report on the basis of the assumed current level of developer contributions (the study assumed a current base level averaging £7000 per dwelling, offering a worked example based on current planning application, and the assumptions on how land values relate to deliverability through the incentivisation of owners to sell. In spite of these findings, the viability study suggests that sites will be viable in only 30% of the scenarios tested. This is not an adequate basis to</p>	<p>The same objector has challenged the viability study and this will be a matter for debate at the examination. Clearly the concept statement should be consistent with the evidence base for the strategy as a whole.</p>

Main Issues raised	Officer response
<p>justify the policy stance. The contributions assumed in the study are contrasted with the scale of infrastructure costs identified in the Infrastructure Needs and Funding Study undertaken by EDAW/AECOM (prospective developer)</p>	
<p>The concept statement relies too much on the existing environmental designations, including some local ones, in particular open space and landscape designations. These need to be reviewed in order to enable appropriate development, including connectivity and multi-functionality without unduly fragmenting the resultant communities. The text of the document and the constraints maps need to be amended to make clear that these represent existing local designations and a review of local designations would form part of the SPD process (prospective developer)</p>	<p>This illustrates the dichotomy of views between prospective developers and many residents. In response to questions raised by the inspector it may be advisable, if the focussed changes are submitted, to clarify the status of some of the constraints illustrated and highlight the fact that not all are absolute. Members need to consider if there is a stronger argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind.</p>
<p>Strongly support the proposal for enhanced orbital link between Broadland Business Park and Sprowston fringe. The Council should be prepared to countenance early development to create such a link. Dispute the suggestion that this could only be sufficient for 2200 dwellings as indicated in paragraph 45. they should be further evaluation of the potential for such orbital roads to replace sections/all of the NNDR if funding is not available and identification of sufficient information to indicate that the growth triangle is developable at the level proposed without the NNDR. This is particularly important because of shortfalls and uncertainty over funding of the NNDR (prospective developer)</p>	<p>The limitations of what can be built in advance of the NDR are likely to be debated at the examination</p>
<p>Paragraph 5 of the vision of FC 10 refers to minimising detrimental impact on the environment in all its guises. Under the terms of the Habitats Directive and the Conservation of</p>	<p>Environment in all its guises includes factors such as the setting of conservation areas, distant views etc which extend beyond the habitats regulations. The wording is considered</p>

Main Issues raised	Officer response
Habitats and Species Regulations 2010 development must avoid adverse effects, not simply minimise them.	appropriate
An AAP is the appropriate mechanism for developing policy governing comprehensive land designations to provide for major urban extensions. The necessary consideration and impact resulting from the growth triangle is far too great to be contained within an SPD. The proposal is contrary to PPS 12 (prospective developer)	This is a different response from that of most developers who seek to change the concept statement in the direction of more flexibility. Members need to consider if there is a stronger argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind and whether this should follow the AAP route (or any replacement process introduced by the new Government) so that more formalised examination will be undertaken.
Uncertainty over the NDR has increased since submission. The reference in the focussed changes to the need for “permeability” across the NDR illustrate that a road of this nature is not suitable within an urban extension. Concept statement still talks of aspiration for tram – train but no work has been done on this. Not clear how bus rapid transit will effectively service all new “quarters” in the triangle. Doubts about delivery of green infrastructure and protection of environmental assets are reinforced by the recent Belmore Park “charette”. The concept statement should not accept a lower standard than the stated policy aim of zero carbon status by 2015, but should specifically favour non biomass crops as a source of energy to avoid supplanting food production. Water neutrality and a commitment to no overall increase in water usage should be guiding principles of the growth strategy, including measures to improve the water efficiency of existing development.	The NDR will be debated at the examination. This is expected to include potential for crossroad movement. Tram train was principally introduced as a concept by promoters of the eco community and, while welcome, is not seen as the cornerstone of good public transport strategy. It is undeniable that the “charette” has introduced a great deal of local anxiety. With regard to local energy generation, the “default position” in paragraph 24 is the requirements of the relevant policy in the Joint Core Strategy. This seems entirely appropriate. It is not considered appropriate for the concept statement to specify particular fuel sources for local energy – though this will need to be undertaken through more detailed masterplanning/SPD
Not enough commitment to cycle facilities – need for high speed cycle link engineered for the 45 mph cruising speed achievable by high efficiency cycles is needed to avoid the loss of an	There is a commitment to cycle facilities. The NATS implementation plan demonstrates this, though it does not specify the need for high performance facilities.

Main Issues raised	Officer response
existing world leading cycle development undertaking	
Doubt the commitment to build upon the eco credentials of the area – how many wind turbines, how many water mills, what quantity of biomass will be generated from reed beds?	An attempt to specify the precise mechanism for production of local energy would be excessive detail in the concept statement.
<p>Reiterates previous comments about the soundness of the JCS as a whole. Specifically oppose strategic allocation – testing and consultation with the public and service providers have not been undertaken and critical infrastructure cannot be relied upon. The nature/mix of development and justification of the defined boundary is not sufficiently firmly established to make an SPD an appropriate vehicle. It therefore fails to meet the guidance in PPS 12 and is unsound because it is not “founded on robust and credible evidence base” and not “the most appropriate strategy when considered against reasonable alternatives”. Similarly it fails to meet guidance published by the Planning Inspectorate (Examining Development Plan Documents: Learning from Experience; paragraph 31) in that detailed delivery matters such as availability and infrastructure requirements have not been resolved. There is no demonstration how the strategic allocation will be delivered in a single concept master plan, and the diagrams do not indicate which land is available and expected to be relied on and delivered to meet the growth. Concern over ambiguity about the use/ future of organised recreation facilities, and concern over the implication that grade 2 agricultural land will be developed (land owned by Norfolk County Council). Matters such as this should have been resolved by a detailed concept master plan ahead of the strategic allocation. The environmental impacts of the NNDR do not appear to have been taken into account in setting</p>	<p>The JCS as a whole will be tested at the examination including the role, function and deliverability of the NDR. Similarly infrastructure will be required whether the growth triangle (if confirmed in principle through the examination) is treated as an allocation to be guided through masterplanning/SPD, or a location to be guided through the production of an AAP. The area of the growth triangle was shown in the submitted version of the JCS and has not changed. In practice it is bounded by the urban edge and the proposed route of the NDR with an extension to encompass the land promoted through the eco community proposal. It was never envisaged as “wall to wall” development and the concept statement was an attempt to put flesh on the bones. The principle of the growth triangle is believed to be sound and will be tested at the examination to judge whether it is the most appropriate strategy. The principle of a major growth location has been the subject of repeated iterations of sustainability appraisal, and the extended SA. has looked at how the concept statement elaborates on policies already examined. Nevertheless, Members need to consider if there is a strong argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind and whether this should follow the AAP route (or any replacement process introduced by the new Government) so that more formalised examination will be</p>

Main Issues raised	Officer response
<p>boundary of the strategic allocation, nor have uncertainties over its delivery been adequately covered by flexibility in the concept statement. This is contrary to the implication in the concept statement that the NDR can be relied on (paragraphs 10 and 44), the timescale of the exercise to produce and consult on the focussed changes has not permitted adequate scoping of testing of suitable alternatives to comply with the SEA directive</p>	<p>undertaken.</p>
<p>No objection in principle, but Highways Agency has a concern that without careful planning there is a danger that the area will be developed in a piecemeal way. In working with the County Council on developing the evidence base for the transport policies in the area and developing a junction scheme for the improvement of Postwick junction, there has been an underlying assumption that sustainable growth in the area would be accompanied by high modal shift away from travel by private car. If this is not achieved there is some risk that the highway network will not be able to cope with potential future levels of traffic and this could have the long-term bearing on achieving planning consents for development towards the end of the plan period. Highways Agency would prefer to return to the concept of an area action plan, but if not it is important that mechanisms are put in place to ensure growth takes account of the “big picture”. (Highways Agency)</p>	<p>The concerns of the Highways Agency are not so much with the aims of the concept statement but whether it can be delivered through an SPD route rather than an AAP. The lack of consensus amongst landowning interests/prospective developers, particularly in the southern part of the area, does add fuel to this concern. Members need to consider if there is a stronger argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind and whether this should follow the AAP route (or any replacement process introduced by the new Government) so that more formalised examination will be undertaken.</p>
<p>Believe the concept statement is not “effective” because of restrictions on the delivery within the area and not flexible because it fails to take into account locations for development consistent with policies in other parts of the document, putting delivery at risk due to its extensive rigidity. The emphasis on protection of historic park land and local designations of landscape value is unjustified and contrary to national</p>	<p>One of the purposes of the concept statement was to identify areas of local environmental value, and this is considered a fundamental part of it. Some clarification about the precise status of designations such as landscape value and county wildlife sites might be appropriate as requested by the inspectors, but their presence cannot simply be dismissed. Members need to consider if there is a</p>

Main Issues raised	Officer response
<p>guidelines. The NDR itself cuts through historic park land, and a blanket restriction on the other development is unreasonable. Delivery is dependent on the eco towns programme and if funding for this, or the NDR upon which the Rackheath scheme is dependent, should be restricted, there is likely to be a shortfall in delivery. The concept statements indication of 170 to 200 hectares being made available for the delivery of 6000 dwellings (Para 29) leaves little room for error. The concept statement itself Indicates that “Detailed masterplans” for parts of the growth triangle should be delivered, and it is these that should determine precise locations for development and areas to be protected from development rather than the core strategy. In order to achieve delivery, the concept statement should allow greater flexibility rather than its current definitions of constrained land. Paragraph 18 of the concept statement and the constraints and opportunities mapping should only include nationally designated constraints. Wildlife corridors and open space and amenity areas can be provided in the more detailed master planning stages to provide open space and protect historic landscape and natural assets(pro prospective developer)</p>	<p>stronger argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind and whether this should follow the AAP route (or any replacement process introduced by the new Government) so that more formalised examination will be undertaken.</p>
<p>The diagram in the concept statement showing transport facilities shows sections of a road linking Broadland business park to the Sprowston fringe, but with a gap between Plumstead Road and Salhouse Road. This gap should be closed by the obvious “missing link”. Objectors have long argued excessive reliance on the NDR and such a link would enable development to proceed in the interim. Racecourse plantation is rightly shown as a county wildlife site and area of landscape value, but the designation is inaccurately defined and includes a small area of former pig farm buildings</p>	<p>The map illustrates current proposals whether taken from the adopted local plan or NATS implementation plan. The “missing link” does not feature in the adopted plan, and indeed cannot until issues at the Postwick junction are resolved, but the text of the concept statement does make clear that full consideration should be given to making this link (Para 26). Precise locations for development would need to be worked through detailed masterplanning, but the scale of development proposed means that wherever located, it should be possible to access a good standard of</p>

Main Issues raised	Officer response
<p>which should be incorporated in any development in the area. Challenge the implications in paragraph 42 of the concept statement – Thorpe End has a good service base with a wide range of shops and is ideally suited to expand. While there may be local resistance, localism should not mean simply what one village wants – it should involve the wider community to establish what is best for the wider community, not simply a village by village approach. Because of this unreasonable restriction on the potential for development in Thorpe End, paragraph 42 is unsound (prospective developer/landowner)</p>	<p>social facilities. It would be appropriate to check the detailed boundary of the Racecourse Plantation County Wildlife Site before the concept statement is finalised.</p>
<p>Fails to address the fundamental objections to concentrated growth in this area. Unreasonable to prevent people adding to original objections. Concept statement contains some changes to the JCS but is fundamentally a restatement of the ideas in the main text, still harking back to previous Governments policies, including eco towns. Amounts to a wish list without sufficient substance to justify the SPD approach, and fails to meet requirement that consultation is undertaken in a way and time when those consulted can influence the outcome. Growth triangle is strategically the wrong place to promote growth in the Norwich area, no suggestion of waste recycling in the draft waste management plan produced by Norfolk County Council. Green infrastructure would be massively eroded by the development. Past record in providing special, distinct and exciting places to live and work is not good. The argument of paragraph 5 (should refer to paragraph 3?) is to enable development to progress in a timely and controlled manner. This is inconsistent with the approach in the rest of the JCS. Broadland abandoned proposed consultation on site allocations DPD– concern that this was delayed because</p>	<p>It is true the concept statement does not represent a fundamental shift in the overall scale of growth or the strategy –it is an elaboration of policies already within the JCS. As such, the consultation was intended to be about how a major urban extension in northeast could be delivered. The principle of the strategy will be tested at the examination, along with the deliverability of infrastructure. Development can contribute towards green infrastructure but it is undeniable that a considerable amount of Greenfield development will be needed to deliver the scale of development considered to be necessary. This however is the case whether the growth triangle were to be delivered through SPD/masterplanning mechanism or an AAP. Additional recycling facilities are likely to be needed to deal with overall growth, and it would make sense to incorporate facilities within the major growth location. The County Council has been involved in the preparation of the strategy throughout. The SPD route was considered appropriate to speed up the development of a planning framework as the current absence of a five year land supply is likely to lead to development</p>

Main Issues raised	Officer response
<p>it would highlight the full scale of the plan. Ratio of house price to income interesting but a consequence of many factors, not simply supply. Major development on this scale has never been achieved in the area before – a more dispersed approach would be better. Document is unclear/ambiguous/inconsistent about energy and water. Health facilities also a constraint. The recent evidence on failure to expand existing primary school casts doubt on the ability to create a secondary school by 2026. Similarly, track record does not indicate ability to deliver high quality public transport. Tram train concept is flawed. Must continue to question reliance on NDR and its prospects of delivery and underlying model outputs. Broadland has poor track record of community engagement as evidenced by the Ecotown Programme Board, so can have no faith in final section of concept statement. Area action plan is the appropriate mechanism to plan an area of major growth, and is subject to independent examination and sustainability appraisal</p>	<p>pressures as the housing market picks up. The decision to rescind the RSS was a consideration in Broadland's decision not to progress consultations on site specific allocations, because it was necessary for the JCS to give certainty over the future scale of development. However once the certainty is restored it will be necessary for a more detailed framework to be put in place quickly. Members need to consider if there is a stronger argument for a more community focussed building of the detailed plans once the JCS has established principles to resolve issues of this kind and whether this should follow the AAP route (or any replacement process introduced by the new Government) so that more formalised examination will be undertaken. The examination will consider whether there is a reasonable prospect of the necessary infrastructure being delivered. With regard to schools, the County Council has been part of the GNDR and involved throughout the preparation of the JCS.</p>
<p>Opposition to development proposals for Wroxham and impact of growth triangle on the village</p>	<p>The examination will consider the suitability of Wroxham to fulfil the role of key service centre as well as proposals for the growth triangle</p>
<p>Response offering general support to the principle of major growth in the northeast in the form of an urban extension. The landowners in this part of the northeast, the nascent Broadland land trust produced a number of collective presentations and commissioned a scoping exercise for an Enquiry by Design. However due to complexity of formulating collective promotion arrangements and the changing planning and financial context, the respective landowners have promoted their holdings separately in advance of a legally formalised consortium of partnership. There is</p>	<p>Support in principle is welcome, but it is a matter of some concern that landowners are not yet able to act in a coordinated way. It is a matter of concern that the objection states that the scale of growth promoted by the objector can be accommodated without the NDR. Some shared infrastructure will demand a commitment to a particular scale of growth, and this can only be accommodated if the NDR is committed. If committed, some growth could take place in advance, but the general scale referred to in the concept statement is as advised by</p>

Main Issues raised	Officer response
<p>support in principle for the urban extension, and much of the concept statement but detailed criticism, meaning the concept statement is unsound as drafted. Key areas of disagreement include: the inner link between Sprowston and Broadland business park passes through clients land. Completion of this link is supported, but the objector argues that this potential means there could be a commitment to some growth ahead of the NDR to a greater extent than acknowledged by the local planning authorities: the land ownership of the objector is adjacent to the urban fringe and comprises a natural location for the urban area to grow organically and sustainably: county wildlife site designation should not be an impediment to development, as development will facilitate heathland restoration, and management of woodland for recreational rather than commercial purposes – landscape should not be seen as static – excessive reliance on existing designations ignores the complexity and timeframe involved in bringing together neighbouring sites which can create a coordinated and more sustainable approach to growth: development of a landscape framework will need to recognise a fundamental shift in the character of the area from urban fringe towards an integral set of neighbourhoods. Protection of natural features will be important, but such features must also respond to a changing role: the landscape and wildlife qualities of the county wildlife sites in the objectors ownership are not uniform: objectors land ideally located to promote sustainable transport, and to facilitate improved orbital connections to major employment areas. Well located in relation to proposed BRT route. Believe that the levels of growth promoted by the objector can be delivered without the NDR through the</p>	<p>the County Council as transportation authority. The County Council's evidence will justify this. The purpose of the concept statement was to promote a mechanism for coordination, and it is only through co-ordination that the scale of development on any particular parcel of land can be determined. Detailed investigation may demonstrate some development could be accommodated within county wildlife sites without compromising their ecological value, but the start point should be that their value is not compromised. If a concept statement is to go forward, consideration will need to be given to the detailed suggestions for wording. Many of those relating to the aims and objectives appear reasonable. However cannot accept that the outcome of a “charette” which looked only at the objector’s land is a suitable basis for co-ordinated masterplanning. If the eco community remains, the aspiration is to form a cornerstone of an entire urban extension setting the highest standards of sustainability. Accept that walking, cycling and public transport nodes should focus on local service areas, but this could be achieved through masterplanning. Paragraph 48 states that it is anticipated that development will progress in all quarters concurrently. This was intended to indicate that there would be no artificial restraint on development, rather than to indicate that development in one quarter would be held back until the others were “ready to go”. Given that the paragraph acknowledges the need to deliver dwellings rapidly, the meaning is considered clear enough.</p>

Main Issues raised	Officer response
<p>provision of this link –the soundness of the JCS is threatened by the failure to distinguish between growth quarters such as the land promoted by the objector that can come forward without the NDR and those that cannot: recognise the constraints highlighted in the concept statement but comment that these do not present any unusual or unexpected constraints in the context of significant growth –recognise the need for coordination between development “quarters”, but this should not preclude an incremental approach when infrastructure can be phased to unlock successive waves of development: broadly support vision but first paragraph should reflect the fact that landscape and heritage assets will have the changing role within the fabric of the area, and references to local food links and production, fourth paragraph add references to physical linkages between the old villages of the growth triangle and suburbs of its hinterland to promote integration and equity of access to facilities and add reference to the knowledge economy: general support for objectives, but in housing objectives introduce more emphasis on the need for different life stages to be accommodated in the context of a balanced community, economic development more emphasis on mixed use development proposition, some detailed wording changes, more emphasis on creation of an environment to stimulate new business growth and expansion, local business creation and self employment opportunities, emphasise the eco excellence of growth triangle as a means to promote intellectual capital and business and training opportunitiesand, in environment objectives add emphasis on local food and fuel supply and reinforcing local supply chains, and emphasise provision of leisure/well-being, educational and productive opportunities: refer to the “ charette”</p>	

Main Issues raised	Officer response
<p>recently promoted which will form the basis of a master plan for the development of the objectors land and point out that “ charettes” have been cited as a potential mechanism for engaging communities in the context of the government’s localism agenda: paragraphs 18 to 21 – important to recognise the changing context in which landscape features will sit. The value of existing designations such as county wildlife sites and local landscape designations can only be judged through more detailed local investigation, and should not be seen as a blanket obstacle to development – as with other aspects of the strategy economic sustainability should be a key consideration in planning green infrastructure: paragraph 24 object to the statement that buildings in the area will be expected to comply with the requirements of the eco towns policy statement – this only applies to Rackheath – extending the standard is onerous and not justified: paragraph 26 Sprowston –Broadland Business Park link will enable delivery of the urban extension in this part of the triangle in advance of the NDR: paragraph 33 accept that a coordinated approach to development in the area will be needed and could take the form of a supplementary planning document but need not constitute a full masterplanning exercise: paragraph 36 broadly support the principles, but more emphasis should be given to the provision of sustainable transport interchanges where walking, cycling and public transport routes converge, and the location such interchanges should have regard to public services facilities of major infrastructure elements to be determined through the SPD: paragraph 44 – object to the statement that there cannot be a commitment to large-scale development in the growth triangle until there is sufficient certainty of the construction of</p>	

Main Issues raised	Officer response
the NDR –objector has already demonstrated that some development can take place with the provision of an alternative orbital link: paragraph 48 – object to the statement that development in all quarters should progress concurrently.	

N. B.

If, having considered the response, members conclude that the focussed changes involving the proposal for a strategic allocation based on the concept statement should be formally submitted, it will be necessary to indicate to the inspector where minor changes in the light of the response would be acceptable. **Some such changes are shown in bold text in the table above.** Given the timescale to submission, this will require some delegation agreement.

4.11 Supporting evidence: Affordable Housing Viability Study

Representations received	
Total	4
Compliant	
Not compliant	
Sound	1
Unsound	3

Main Issues raised	Officer response
The study underestimates the scale of developer contributions correctly and likely to be required and therefore its judgment on the viability of affordable housing contributions as unreliable (one representation includes an example from a current application)	The affordable housing study was undertaken by Drivers Jonas Deloitte who will be invited to defend it
The study does not accurately reflect stakeholder concerns expressed at a workshop held to inform the study	The affordable housing study was undertaken by Drivers Jonas Deloitte who will be invited to defend it
The study's assessment of land values in particular for greenfield sites underestimates the price, or other considerations, needed to incentivise landowners to sell and again this affects judgments about viability	The affordable housing study was undertaken by Drivers Jonas Deloitte who will be invited to defend it

Main Issues raised	Officer response
Disagree with the calculation of overall plan-wide affordable housing and its relationship with policy target of 40%	The calculation of an overall plan wide target is considered to be a reasonable approach
The study's assumptions on density are unrealistic, and lower densities prevalent in parts of Broadland and South Norfolk mean that its conclusions cannot be relied upon. The table in annex 1 of the statement of focussed changes showing anticipated affordable housing contributions from existing planning commitments illustrates this discrepancy.	The affordable housing study was undertaken by Drivers Jonas Deloitte who will be invited to defend it
It is important to maintain the emphasis on affordable housing as its provision is a significant factor in improving health outcomes across the population.	Noted

4.12 Supporting evidence: Sustainability Appraisal update

Representations received	
Total	5
Compliant	
Not compliant	4
Sound	
Unsound	4

Main Issues raised	Officer response
The SA does not adequately reflect the reliance on a major road scheme, or the need to conserve water supplies and agricultural land	The strategy for growth in the Norwich policy area in the JCS is predicated on the delivery of the NDR. The spatial plan must take account of the transport strategy as outlined in the local transport plan. Given the significance of the NDR proposal in relation to the local transport network and the potential it offers for improved public transport, it would be remiss to propose a strategy which did not take account of it. At each stage in the JCS's preparation the certainty of delivery of the NDR has been maintained or

Main Issues raised	Officer response
	enhanced.
<p>The SA was not compliant with the SEA Directive's requirement to give the public an early and effective opportunity to express their opinion –complaints relate to the timescale of the consultation and limited publicity, particularly as the underlying aim of the focussed change regarding the growth triangle is to avoid the need for public examination of an Area Action Plan</p>	<p>The SA was undertaken by Scott Wilson who will be invited to defend their work. The SA recognised that the concept statement and other changes to policy were building on the original policies which had been subjected to SA and considered whether the elaboration on the original policies would have any relevant consequences</p>
<p>It fails to address the requirements for an alternative to the growth triangle in the event of the NDR/Postwick hub not going ahead.</p>	<p>The strategy for growth in the Norwich policy area in the JCS is predicated on the delivery of the NDR. The spatial plan must take account of the transport strategy as outlined in the local transport plan. Given the significance of the NDR proposal in relation to the local transport network and the potential it offers for improved public transport, it would be remiss to propose a strategy which did not take account of it. At each stage in the JCS's preparation the certainty of delivery of the NDR has been maintained or enhanced.</p>
<p>The lack of testing against an alternative means it is not possible to demonstrate that the preferred strategy is the most appropriate</p>	<p>The issue of flexibility will be one of the matters considered at the examination, but it would be perverse if the strategy did not take account of the biggest proposed investment in the transport network in the area.</p>
<p>The SA relates only to the statement of focussed changes. Because these address only some of the issues raised at the Exploratory meeting, it follows that the scope of the SA is too limited</p>	<p>The statement of focussed changes invited comment on those areas where it was considered the additional work required by the inspector would result in changes to the JCS. In other areas, where no change is proposed, the original SA work is still valid.</p>
<p>In particular, the strategy lacks a "plan B." and is therefore unsound. Because there has been no sustainability</p>	<p>The issue of flexibility will be one of the matters considered at the examination, but it would be perverse</p>

Main Issues raised	Officer response
appraisal of a plan B, it follows that the sustainability appraisal process is flawed	if the strategy did not take account of the biggest proposed investment in the transport network in the area.
The SA derives from the original S. A's scoping report which did not allow for a strategic allocation. The SA is therefore flawed.	The SA was undertaken by Scott Wilson who will be invited to defend their work. The SA recognised that the concept statement and other changes to policy were building on the original policies which had been subjected to SA and considered whether the elaboration on the original policies would have any relevant consequences