

Joint Core Strategy for Broadland, Norwich, South Norfolk

EIP 1: Greater Norwich Development Partnership response to Inspector questions 9 April 2010

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1.	<p>Appendix 7 identifies over 80 infrastructure schemes that are said to be 'critical' to various aspects of the JCS. Where are these dependencies explained, and are any of the identified schemes linked to particular development thresholds that cannot be crossed without completion of certain linked infrastructure? Are all of these items equally 'critical' in the sense that they are potential 'showstoppers' that would render the JCS unsound if any part of the answer to Q2 below were to be in the negative? Would some items more appropriately be described as desirable/ aspirational, and if so, which?</p>	<p>The items listed in Appendix 7 are drawn from the Infrastructure Needs and Funding Study 2009 (INF 1) and are an initial high-level overview of the strategic infrastructure required to facilitate sustainable development and the overall spatial strategy in this JCS. Of necessity, it is ongoing work and is not intended to be an exhaustive list of the entire infrastructure that will be needed by 2026. All costs and timescales are indicative and may vary. The large number of items listed is an indication of the scale of growth and complexity of challenges which the JCS needs to address. However, through the establishment of the Greater Norwich Development Partnership (GNDP), and the adoption of the Integrated Development Programme (IDP) process, the mechanisms are in place to manage the delivery of infrastructure, prioritise investment and deal with risk and uncertainty.</p> <p>Broad dependencies and thresholds are explained and set out in the Infrastructure Needs and Funding Study 2009 (Key Assumptions Paper Appendix B), some have been refined by subsequent work, particularly the Water Cycle Study Stage 2b (ENV 4.4) and the Norwich Area Transportation Strategy (NATS) Implementation Plan (25 March 2010 Report to GNDP Policy Group). See also answers to question 5 and question 6. Dependencies will continue to be refined through the ongoing work on the IDP. The IDP is an iterative tool, initially informed by the Infrastructure Needs and Funding Study but subject to ongoing monitoring and review. More precise timing and phasing of infrastructure will emerge from the IDP process with any specific implications for individual sites addressed through subsequent DPDs and SPDs or the development management process.</p> <p>All the infrastructure listed in Appendix 7 is categorised as critical dependencies as they are either fundamental to the strategy as a whole, critical to the delivery of major growth locations individually, or critical to the delivery of a sustainable strategy.</p>

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		<p>The Infrastructure Needs and Funding Study 2009 categorises water supply and disposal, and electricity supply as critical to enable physical development (see section 14.3 and page 8 of the report). The NDR is also identified in this category within the report due to its fundamental role in delivering NATS and accessing strategic housing and employment growth. Failure to deliver this infrastructure would impact so significantly on delivery and the overall strategy that it would fundamentally undermine the JCS. However, the mechanisms are in place to manage timely delivery of this infrastructure. The promotion of a strategy dependent on the NDR is considered to be an entirely reasonable position as the principal of the NDR was enshrined in NATS (part of the LTP) and was, consequently, part of the context and evidence base when work started on the JCS. Delivery has become more certain through time with repeated endorsement through the support in the East of England Plan, the Regional Funding Allocation, and the decision by the Secretary of State to confirm Programme Entry. Its significance was confirmed at the time in a press statement issued by the Department for Transport. NATS and the NDR are dealt with more fully under the answers to Questions 5 and 6.</p> <p>The southern bypass junctions (trunk road) and Long Stratton bypass are also categorised as critical, as failure to provide them could prevent important elements of the strategy from being delivered. The provision of sufficient green infrastructure is critical to preventing detrimental impacts on sites of international importance (see the Habitats Regulation Assessment (ENV 14.1)). NATS is critical to the provision of sustainable transport and compliance with RSS policy in this regard.</p> <p>Other forms of infrastructure, for example some other elements of green and community infrastructure may not halt development, but are critical to provide a high quality sustainable environment and therefore to the strategy as a whole. It is accepted that provision may be more incremental in nature but the GNDP and the constituent local authorities have a good track record in managing the risks associated with the provision of infrastructure of this kind.</p> <p>In conclusion, the Partnership and the IDP process provide a suitable mechanism for facilitating timely infrastructure delivery. The IDP process will deal with implications for the timing of</p>

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		specific developments. The GNDP believes that there is sufficient certainty, and an appropriate risk management mechanism, for the strategy to be sound in this regard.
2.	Do the providers of all the 'critical' infrastructure items referred to in Q1, especially those required in the earlier stages of the JCS, agree (a) with the principle of their delivery and (b) that there is a reasonable prospect of this being achieved by the stated date? Is there evidence to conclude that the estimated delivery dates in Appendix 7 are sound?	<p>Key service and utilities providers were consulted in the production of the Infrastructure Needs and Funding Study 2009 (INF 1) and accepted the conclusions in the report, including principles and prospects for delivery. Key service and utilities providers have been engaged throughout the strategy's preparation and there are no objections from these to the submitted version of the JCS.</p> <p>Timing and phasing of delivery is subject to continuous refinement as detailed costs and funding become clearer. This is the role of the IDP.</p> <p>Engagement with key service providers is continuing through the development of the IDP. An Engagement Strategy has been agreed with the GNDP Leaders and is being implemented.</p> <p>The County Council is a key provider of strategic infrastructure and is part of the GNDP. The County Council has been fully involved with the production and approval processes of both the JCS and IDP.</p> <p>A draft of the IDP document will be available to the Inspectors prior to the examination.</p>
3.	What is meant by the statement at p10 of JCS that: 'we recognise that we are not yet fully geared up for delivery' and that implementation 'will depend on the coordinated activities of a number of agencies'. What are the mechanisms/	Implementation is explored in TP5: Topic Paper: Implementation and Governance . The statement on page 10 recognises that decisions on further development of the partnership can only take place after Local Government Review processes are completed and clarity on the tariff/ CIL position exists. Progress on the latter has been made - the GNDP Policy Group has considered a Community Infrastructure Levy (GNDP Policy Group 25 March 2010 - Item 6) and have recommended to the constituent authorities in the Partnership to undertake further work to develop a CIL and a timetable to produce a charging schedule is being developed (GNDP Policy Group 25 March 2010 – minutes).

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	timescales necessary to achieve greater readiness in these respects?	Coordination of the activities of a number of agencies has started through the JCS and will continue through the IDP process. An engagement strategy has been developed and is being implemented to further engage service providers in the IDP.
4.	<p>Policy 20: Bullet 1: How is the 'strategic infrastructure' to be identified? Bullets 5 and 6:</p> <p>Is the GNDP in place, and who are its constituent partners?</p>	<p>Strategic infrastructure is the element of need identified in the Infrastructure Needs and Funding Study 2009 (INF 1) and the IDP that is subject to CIL. Following the CIL regulations the GNDP Policy Group have recommended further work to develop a CIL (see question 3) and a timetable to produce a charging schedule is being developed. The final determination of what will be funded by the CIL mechanism, or any variant introduced by a future government, will be set through an independent examination of the proposals for the charging schedule. Infrastructure planning will need to remain up to date to provide the basis for CIL Charging Schedules and the level of detail required is not considered appropriate for a Core Strategy.</p> <p>The CLG advice on CIL is not expected to be exact in recognition that it will always be necessary to retain some flexibility in structure planning and delivery (see CIL guidance: Charge Setting and Charging Schedule Procedures paras 13 – 15, and para 23)</p> <p>The Greater Norwich Development Partnership is a partnership of Broadland District Council, Norwich City Council and South Norfolk Council, Norfolk County Council and the Broads Authority. Terms of Reference are available on the Partnership's website. The JCS was prepared by the three district councils, working with the county council as the Broads Authority is a separate planning authority with an existing core strategy.</p> <p>It is important to stress that of a number of other bodies, including Shaping Norfolk's Future (the local economic development partnership); HCA (following its creation), GO-East and EEDA have a formal relationship with the GNDP as standing advisors. All of these bodies attend regular monthly meetings of the GNDP Directors, and the Member level Policy Group meetings. They have therefore been closely involved in the evolution of the JCS throughout the process.</p> <p>The Partnership was recently inspected by the Audit Commission. The report can be found on the Audit Commission's website.</p>

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	Is any revision required to paras 7.3-7.6 in the light of the draft CIL regulations?	No revision is required to any substantive element of paras. 7.3-7.6, although some up-dating will be required to reflect the fact the publication of the <i>Community Infrastructure Levy Regulations 2010</i> , which came into effect from 6 April 2010. As a result of the Regulations and the accompanying guidance note (<i>Community Infrastructure Levy: An Overview</i>), it will be necessary to reflect the fact that there will be a need for separate Charging Schedules to be produced for each local authority (para. 7.6), although the GNDP authorities have already agreed to work closely in co-ordinating their CIL rates and schedules (see question 3). That work may identify the potential for differential rates across the Norwich Policy Area (para. 7.5), although the strategic intention to charge for greenfield and brownfield land remains (para. 7.5) and for CIL to be charged for both residential and commercial development (para. 7.3).
5.	The JCS indicates (p7) that delivery of the NDR is fundamental to the delivery of NATS and thus the JCS itself. The DfT's announcement (December 2009) that the section from Postwick to the A140 has been accorded Programme Entry status does not seem to include the length from the A140 to the A47 west of Norwich. If this length is not to be constructed soon, what effect would this have on the soundness of the JCS? Does the JCS clearly explain the contingent effects of only partial	<p>The full NDR scheme is illustrated in the JCS and runs from the A47 east of Norwich to the A1067 Fakenham Road (not to the A47 west of Norwich). On 6 April, Norfolk County Council reiterated commitment to delivering the full scheme including underwriting the remaining funding. . Consequently funding sources for the full scheme are identified. The Report to cabinet and minutes of the meeting.</p> <p>Norfolk County Council's Cabinet considered the NATS Implementation Plan and its phased roll out of a co-ordinated set of transport interventions over the period to 2025/6. Cabinet resolved to accept the following recommendations:-</p> <ul style="list-style-type: none"> (i) That in the light of the consultation responses and analysis, Cabinet agree the proposed Plan, endorse recommended changes to a small number of NATS policies and that the NATS area becomes consistent with the Norwich Policy Area (ii) Approve the preparation of an application for planning permission for an NDR from Postwick to the A1067 (iii) Cabinet agrees to underwrite the funding shortfall of £39.7M for the NDR by use of Prudential Borrowing. <p>This resolution confirms the County Council's longstanding commitment to the full length of the</p>

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	delivery of the NDR?	<p>NDR from the A1067 to Postwick. As a result, the County Council is already well advanced with the preparation of a planning application for the NDR and the NATS Implementation Programme identified the NDR for opening in 2015. There is no need, therefore, for the JCS to consider the contingent effects of only partial delivery of the NDR.</p> <p>The NATS Public Consultation and Engagement Outputs and Analysis March 2010 shows the results of the NATS Implementation Plan consultation which took place last year.</p>
6.	Is the JCS clear enough about what NATS actually consists of, given that the substantial concentrated growth in the north is said to 'rely' upon it?	<p>Given the scale of growth and the requirement for sustainable transport, the JCS gives prominence to NATS and provides clarity appropriate to a Core Strategy.</p> <p>NATS is part of the evidence base of the JCS and has formed a prominent focus for transport strategy and investment in Norwich since the 1990s. It is identified in Policy 6 and explained in the supporting text (paras. 5.43-5.49). The NATS Implementation Plan (see above link under question 5) responds to the JCS requirements and provides more detail on the nature of specific schemes, and will be incorporated into the Integrated Development Programme for Greater Norwich. Specific elements of the illustrated schemes, and potentially, additional schemes will come forward as the JCS is implemented.</p> <p>The relationships between the JCS and NATS are evidenced in a range of reports listed as part of the evidence base, in particular the following topic papers:</p> <p>T1 Topic Paper: City Centre T2 Topic Paper: Employment and Town Centre Uses T3 Topic Paper: Environment T4 Topic Paper: Homes and Housing</p>
	Does the diagram on p 61 give sufficient spatial expression to the main	The diagram on page 61 is considered to give sufficient expression to the main spatial elements of the NATS Implementation Plan. The diagram illustrates the emerging NATS Implementation Plan and should be read in conjunction with the policies in the JCS, the Key Diagram, and the

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	<p>elements of NATS and demonstrate clear and appropriate integration between urban growth and the future transport network?</p> <p>Are <u>all</u> the ingredients of NATS equally essential to the JCS?</p> <p>What are the implications if some essential elements are not implemented on time?</p>	<p>illustrative diagrams on pages 59 and 60. The diagram on page 61 gives very significant spatial expression to the main elements of NATS, identifying as it does the principal physical components – i.e. the NDR and the BRT corridors. Indeed, the diagram goes further than might be expected for a Core Strategy by also defining Core Bus Routes, possible rail stations and junction capacity improvements. It even indicates cycle corridors. Other key elements of transport infrastructure are identified, including Park and Ride sites, road and rail corridors.</p> <p>The relationship between urban growth and the future transport network is further explained in the text of the JCS and the substantial supporting evidence. There is a clear physical relationship between the growth areas for housing and employment with the principal radial routes identified on the diagram for public transport focused enhancement. To the north and east of the City the relationship between growth locations and the NDR is clear.</p> <p>NATS as an overall strategy is critical to the delivery of the JCS as a whole, and specifically to delivering sustainable growth of jobs and housing in the Norwich Policy Area. The JCS was developed in the context of NATS and the need to promote sustainable transport. Access and transport principles are crucial to the assessment of growth options in the Issues and Options report and form an important component of the JCS sustainability appraisal.</p> <p>Some individual NATS schemes are essential to growth in specific locations. Appendix 7 (subject to the specified caveats) identifies these more direct dependencies.</p> <p>The NATS Implementation Plan identifies the projected timing of NATS interventions and contains a level of detail which is not appropriate for a Core Strategy. The strategy is clear from the JCS:– NATS including the NDR is needed now (p.8 and p.23), they are fundamental for growth. This does not mean that every element of NATS must be implemented before any growth can take place, and the JCS does not say that; it sets out a strategic position. It is for more detailed plans to consider the precise relationship between individual sites and transport investment but the JCS sets the strategic principles. Large scale growth is dependant on the NDR (e.g. Policy 10, para. 6.18 and appendix 7) and other specific elements of planned growth</p>

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		are dependent on specified public transport improvements made possible by the NDR (see Appendix 7).
7.	What considerations lay behind the relatively narrow range of options generated and considered? Do these represent the only 'reasonable alternatives' in terms of factors such as sustainability and delivery? If so, why is this?	<p>The Partnership considered a wide range of 'reasonable alternatives' in developing the Strategy, informed by delivery and sustainability considerations. At each stage all 'reasonable alternatives', as informed by previous stages, were assessed.</p> <p>Prior to the changes in regulations in 2009 the Partnership had consulted on an 'Issues and Options' stage including a series of workshops and full public consultation (STA2). This stage included a wide range of 'reasonable alternatives', and indeed covered <i>all</i> 'reasonable alternatives'. Options were evaluated by a Sustainability Appraisal and this led to further refinement for consultation under the new regulations.</p> <p>A number of studies informed the Issues and Options stage of consultation including the Infrastructure Needs and Funding Study 2007, Water Cycle Study Stage 1, Retail and Town Centres Study 2007, Green Infrastructure Study 2007, Strategic Flood Risk Assessment 2007.</p> <p>Three options for locating major growth in the Norwich Policy Area were included in the Regulation 25 Technical Consultation.</p> <p>The three options were then carried forward in the Regulation 25 Public Consultation alongside a favoured option. Open-ended questions allowed consideration of alternative options for all draft policies. The Regulation 25: Public Consultation period was extended for 6 weeks to enable the Partnership to draw attention to the Sustainability Appraisal of the options at that time.</p> <p>Each stage was informed by ongoing iterations of the Sustainability Appraisal and further technical studies and responses to consultations that formed part of the evidence base. In addition to the reports covering these issues, TP8: Strategy to accommodate major growth in the Norwich Policy Area explains the Strategy for Growth and the evaluation of the key growth</p>

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		<p>locations and TP7: Settlement Hierarchy recognises the nature of different rural settlements and their role in the overall strategy.</p> <p>The strategy is believed to be deliverable, sustainable, and derived from a rigorous consideration of all the 'reasonable alternatives'.</p>
8.	<p>What further evaluative work of the selected option was done after the Pre-Engagement Inspector's visit?</p>	<p>After the Inspector's review, Water Cycle Study, Sustainability Appraisal and Infrastructure Needs and Funding Study were updated and the Historic Characterisation and Sensitivity Assessment and Regulation 25 public consultation were undertaken. The sustainability appraisal and the public consultation exercise were primarily evaluative, while the other studies included evaluative elements alongside providing further information on how outstanding issues could be resolved.</p> <p>TP8: Strategy to accommodate major growth in the Norwich Policy Area explains the Strategy for Growth and the evaluation of the key growth locations.</p>
9.	<p>In what ways does the selected option compare favourably/unfavourably with the 3 original options and the officers' recommended option (option 1) in terms of infrastructure costs, sustainability, the emphasis on achieving a major shift in emphasis towards public transport in RSS policy NR1 (second bullet), and reliance on the concept of strategic gaps?</p>	<p>TP8: Strategy to accommodate major growth in the Norwich Policy Area explains the Strategy for Growth.</p> <p>T3 Public Transport Requirements of Growth and Public Transport Requirements of Growth: Appraisal of Emerging Option tested the Favoured Option against Option 1</p> <p>JCS 3 The Sustainability Appraisal was an iterative process that was published at each stage of consultation and appraised each option.</p> <p>Issues and Options Stage: Sustainability Appraisal</p> <p>Preferred Options (replaced by regulation 25 stage): Sustainability Appraisal</p> <p>Regulation 25 Stage: Sustainability Appraisal</p> <p>The Water Cycle Study ENV 4.1 – ENV 4.5 was refreshed as the favoured option emerged.</p>

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		<p>This evidence was considered by the GNDP Policy Group at their meeting of 18 December 2008</p> <p>The Infrastructure Needs and Funding Study 2007 (INF 2) compared 2 scenarios for growth, one based on expanding existing settlements and one based on a stand-alone settlement. The Study concluded that a stand-alone settlement was less favourable than expanding existing settlements. The Infrastructure Needs and Funding Study 2009 (INF 1) was commissioned to assess the favoured option.</p> <p>Preserving the character of settlements and preventing their coalescence was a political imperative in South Norfolk and this concept, rather than specific strategic gaps informed the development of the JCS. South Norfolk Council will identify the specific boundaries of strategic gaps in their Site-Specific Allocations DPD, taking account of the requirements of PPS7.</p> <p>GNDP 19 Feb Policy Group</p>
10.	<p>Bearing in mind the comments of the early-engagement Inspector and discussion of gaps/wedges in the recent decision concerning Norwich Common, Wymondham, has any work been undertaken in pursuance of PPS7, para 25, on the justification for giving continuing weight to local landscape designations?</p>	<p>As set out in the response to Question 9, preserving the character of settlements and preventing their coalescence was a political imperative in South Norfolk and this concept, rather than specific strategic gaps informed the development of the JCS. South Norfolk Council will identify the specific boundaries of strategic gaps in their Site-Specific Allocations DPD, taking account of the requirements of PPS7.</p> <p>TP8: Strategy to accommodate major growth in the Norwich Policy Area</p>

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11.	Has the JCS been justified at a late stage, or retrospectively, by new evidence? Do agenda, reports and minutes exist for all relevant meetings?	The development of the JCS has been an iterative process informed by the evidence as it emerged. Agendas, reports and minutes exist for all relevant meetings. Each authority publishes Executive/ Cabinet and Council papers on its website.
12.	How does the figure of 27,000 additional jobs for 2008-26 (policy 5) relate to the figure of 35,000 for 2001-2021 in RSS policy E1? How does the JCS reflect the RSS figure, and is this achieved sufficiently clearly?	<p>The JCS more than meets the RSS requirements for jobs growth. However, forecasting and monitoring of jobs growth is fraught with difficulties including those associated with the lack of good quality data at the local level. Comparing different but overlapping forecasting periods, with targets derived from different sources and at widely spaced base-dates, adds a further level of uncertainty. Fortunately there is a straightforward answer to the question posed as regional monitoring in April 2009¹ suggested that the Greater Norwich area had already met its RSS target of 35,000 additional jobs by the 2008 base date of the JCS. Therefore, if these figures are correct, any growth in the JCS would be additional to the RSS target and EERA considered the JCS target to be in general conformity with the RSS. The derivation of the JCS jobs target is explained in TP2: Employment and Town Centre Uses. The base date for the JCS is 2008 and the target of 27,000 jobs equates to an annual average increase of 1,500 per annum over the period 2008-2026. If this average is achieved over the shorter period 2008-2021 it would deliver 19,500 jobs. Added to the results of the monitoring report, the JCS would provide for a total of nearly 55,000 jobs in the RSS period 2001-2021.</p> <p>The regional monitoring result might be considered to be somewhat overoptimistic. A more recent set of forecasts is provided by the East of England Forecasting Model. This also includes</p>

¹ East of England Plan Annual Monitoring Report 2007-2008 : Background Paper : Monitoring employment in the East of England 2001 to 2008 : Table 1

<http://www.eera.gov.uk/GetAsset.aspx?id=fAAyADgAMgAwAHwAfABGAGEAbABzAGUafAB8ADAAfAA1>

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		<p>data on past performance derived from a different methodology to that used by the regional monitoring paper to derive the number of jobs in an area. The autumn run of the EEFM², under the measure “Total employment (jobs)”, indicates an increase of 23,000 jobs 2001-2008. This is somewhat lower than the growth recorded in the regional monitoring paper. Nevertheless, added to the 19,500 jobs derived from the JCS annual average, total growth for the RSS period 2001-2021 would be over 42,000 jobs.</p> <p>As an alternative approach, the EEFM Autumn 2009 run also provides a forecast of total growth for the period 2001-21 of 37,300.</p> <p>In the context of the uncertainties associated with jobs forecasting and monitoring, the difference between 42,000 jobs (derived from the EEFM 2001-2008 plus JCS average target 2008-21) and 37,300 jobs (from the EEFM forecast) is small, and both exceed the RSS target. The former might be considered an overestimate as jobs will be lost in the recession so the annual average will need to be exceeded in the middle and latter part of the JCS period (including 2021-2026). Conversely the EEFM may be an underestimate for the reasons set out in the topic paper.</p>
13.	<p>Is there a fatal lack of evidence on AH testing? Could the Broadland testing (undertaken at the time of the local plan) fit with the terms of the Blythe Valley judgement concerning the subsequent change in the national definition of AH in PPS3?</p>	<p>The GNDP considers that there is evidence, sufficient for a Core Strategy, to justify the policy on Affordable Housing. The Broadland testing in 2006 is not part of the justification for this policy.</p> <p>The evidence base includes estimates of the potential for land value capture, although not in the form of a single stand alone study of affordable housing viability. Instead, the evidence that the policy on affordable housing is realistic is drawn from other sources.</p> <p>The Infrastructure Needs and Funding Study 2009 (INF1) looked at the total amount of infrastructure needed to cater for the scale of growth being planned for. Without a view of the necessary infrastructure and its cost, it would be impossible to assess viability of a specific</p>

² http://www.insighteast.org.uk/WebDocuments/Public/approved/user_9/Local%20Area%20Forecasts_baseline_forecast_forecast-only.xls

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		<p>contribution requirement, such as affordable housing. The study contains at chapters 14, 15 and 16, an assessment of the costs of infrastructure broken down by broad location, a general discussion of funding arrangements and an assessment of the opportunities for introducing a tariff-based charge, based on the market assessment. The market assessment was undertaken by specialist subcontractors Drivers Jonas and included dialogue with land buyers and local agents [see section 16.1 of the report]. When the study was produced, regulations governing CIL had not been produced their final form, though early drafts had been published.</p> <p>This part of the study tests potential for land value capture in the light of a number of considerations. These explicitly include the provision of affordable housing and include:</p> <ul style="list-style-type: none"> • 40% affordable housing • A notional 70/ 30 split between social rented and intermediate housing • Assessments based on two scenarios, an assumption that affordable housing grant will be paid at historic rates, and an assumption it will not • Tariff payable on all units including affordable • Different assumptions about future market strength • Different assumptions about landowner expectations of land value • The impact of these considerations on viability in different parts of the area <p>The GNDP is also aware of a report by Tribal for Thames Gateway South Essex partnership looking at methodologies for undertaking affordable housing viability assessments. That report (which is available from TGSE but not currently published on their website) notes that land value expectations tend to be greatest in relation to brownfield sites, but that while this can affect expectations relating to greenfield sites, in reality, even a development with significant affordable housing and section 106 requirements on a greenfield site will nonetheless create significant value over and above alternative uses.</p> <p>In light of the findings of the The Infrastructure Needs and Funding Study 2009, and also to satisfy itself as to the reasonableness of its current policy, Norwich City Council commissioned</p>

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		<p>Drivers Jonas to undertake further detailed work on viability within the city. This looked at a number of sites which had come forward recently, evaluating the potential for a policy requirement of 40% affordable housing. The report examined sites in terms of their size, previous use, other section 106 contributions and details of the acquisition when known, taking into account the time and state of the market when the site was acquired. It does however remodel them on the assumption that the 40% affordable housing would be sought rather than the current policy requirement. It tests sites on a with and without housing grant basis, compares the residual value with the previous or alternative uses, using different assumptions about future market strength.</p> <p>The view of the GNDP is therefore that there has been sufficient examination of the local housing market, based on a reasonable range of assumptions and differing market conditions, to give confidence that the policy is appropriate for a Core Strategy and is sound. However, housing markets are volatile, and testing at any one point in time cannot offer cast iron guarantees in relation to a wide range of sites and all possible permutations of market, landowner and grant availability considerations. It is therefore important that the wording of a Core Strategy policy is sufficiently flexible to take account of such considerations at the point of implementation, and that GNDP is firmly of the view that this is the case.</p> <p>Funding from the Homes and Communities Agency will significantly affect the viability of development and Single Conversations have taken place or are ongoing with all three districts and the GNDP.</p> <p>Local Investment Plans will be the starting point for partners to consider the HCA resource allocation to local areas. The Single Conversation will provide the opportunity for partners to build programmes of investment to deliver a range of outputs. In the case of the HCA, the Local Investment Plans will help to build up the Regional Investment Plans, which in turn will help inform the HCA's Corporate Plan.</p> <p>The Local Investment Plan will set out all the needs for an area to deliver the agreed vision and</p>

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		<p>objectives and identify anticipated outputs and outcomes attributable to all partner interventions. Like other authorities in the East of England, the GNDP authorities are working with EEDA to ensure that the IDP fulfils the requirements of Local Investment Plans as promoted by the HCA.</p>
14.	<p>Considering the housing trajectory at Appendix 6 and the conclusion on housing land availability in the appeal decision concerning Norwich Common, Wymondham, is there a sufficient supply of specific deliverable sites to deliver housing in the first 5 years?</p>	<p>The GNDP recognises that there is not a 5 year land supply in the Norwich Policy Area and has published a statement on its website. The Joint Core Strategy will enable co-ordinated delivery to ensure a supply. The flexibility within the JCS in providing a range of scales and locations of development provides an appropriate strategic response to the lack of a 5 year land supply. The GNDP has also endeavoured to move the JCS forward as quickly as possible and its approval would enable the partner authorities to address this issue.</p> <p>The Joint Core Strategy is not Site Specific. Each authority is undertaking a site specific DPD. Timetables can be found in each authority's Local Development Scheme.</p> <p>JCS 16.1 Broadland (amended 13 April 2010) JCS 16.2 Norwich JCS 16.3 South Norfolk</p>
15.	<p>Are these policies consistent with PPS1 supplement para 11 (re non duplication of controls under planning and other regulatory regimes) and paras 31/32 (re the possibility of situations where it 'could' be appropriate to anticipate levels of building sustainability in advance of national standards and, in</p>	<p>Questions 15, 16, 17 and 18 are related and are covered by a single response.</p> <p>The policies are consistent with national policy in PPS1 Climate Change supplement. Paragraphs 31 and 32 of the PPS1 supplement state that local sustainability requirements for specific issues such as energy and water can be set provided that national standards such as the Code for Sustainable Homes are used and local circumstances warrant it. Such an approach meets the requirements of paragraph 11 of the PPS in that setting local standards for specific local issues complements rather than duplicates national building regulations.</p> <p>Policy 3 of the Joint Core Strategy sets specific requirements for water and energy elements of the Code for Sustainable Homes. The Water Cycle Study (ENV 4.1 – 4.5) and the Sustainable Energy Study (ENV 5) provide locally specific evidence and have been undertaken in compliance with national guidance. These studies show there is a need for a positive policy</p>

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	<p>such cases, demonstrating clearly ‘the local circumstances that warrant and allow this’ and focusing ‘on development area or site specific opportunities’? Bearing in mind these points, what is the justification for departing from the national programme for strengthening the Building Regulations (bullets 3 and 4 of policy 3)?</p>	<p>approach to enable development to make best use of abundant sustainable energy potential and to reduce water use in an area of water stress. Ensuring development is energy efficient is a key element of enabling cost effective provision of sustainable energy sources.</p> <p>The Water Cycle Study was undertaken to meet the requirements of the Regional Spatial Strategy. Its methodology is in compliance with that promoted by the Environment Agency (Water Cycle Study Guidance)</p> <p>It provides a justification for new development being as water efficient as possible in an area suffering from water stress and recommends the policy approach set out in policy 3 of the JCS (Water Cycle Study Stage 2b Non-Technical Summary - see page 98 10.2.13 and 14).</p> <p>Whilst policy 3 sets demanding standards for water efficiency, it does not require all new development to be water neutral. Water neutrality ensures that new development does not increase water usage in the area as a whole, requiring new homes to be built to the highest national standards of water efficiency as well as reducing water use in existing homes through increased metering and retrofitting water efficient devices, possibly through developer payments. Water neutrality is a requirement for Eco-town development under national policy. The Water Cycle Study (5.4.14, page 44) showed that water neutrality is theoretically achievable in the area.</p> <p>The Environment Agency's comments on the submission version of the JCS supports "an aspiration to achieving water neutrality across the JCS area". In their position statements, the Environment Agency state that "Future development should aim to be as water efficient as possible", while Natural England state their long term view that water neutrality "Is likely to become an increasingly important element underpinning sustainable development in the East of England."</p> <p>The Sustainable Energy Study (ENV 5) was undertaken to comply with the PPS1 requirement for local planning authorities to develop planning policies for new developments to “<i>make good use of opportunities for decentralised and renewable or low carbon energy (defined as energy</i></p>

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		<p><i>supply from local renewable and local low-carbon sources (i.e. on-site and near-site, but not remote off-site) usually on a relatively small scale.” To inform such policies PPS 1 requires “an evidence-based understanding of the local feasibility and potential for renewable and low-carbon technologies, including microgeneration</i></p> <p>The study followed the methodology set out in CLGs “Working Draft of Practice Guidance to support the Planning Policy Statement: Planning and Climate Change”, which has now been developed into web based guidance provided by CLG, the Planning Advisory Service and the Homes and Community Agency available at http://skills.homesandcommunities.co.uk/planning-and-climate-change</p> <p>.</p> <p>The Sustainable Energy Study (ENV 5) showed that there is sufficient renewable energy resource potential to meet the energy needs of all development in the area and that larger scale development in particular could meet its all its needs on site or through a dedicated facility near-site.</p> <p>If new development is to be seen to benefit from renewable or low carbon energy, it is essential that the capacity of any new sources provided can demonstrably be related to the energy consumption of the development in question.</p> <p>The study’s policy recommendations were carried through into the JCS. The policy is development area specific in that it sets different requirements for different scales of development as the study showed these to have different potential for sustainable energy provision.</p> <p>The Sustainable Energy Statements and the carbon infrastructure fund are intended to ensure that the first phases of large scale development contribute to the provision of a sustainable energy facility to serve the whole of the new development, rather than through less cost effective small scale plants.</p>

No.	Question	Response
		<p>Contractual links are intended to ensure that energy should not be supplied from a remote off-site location, such as an off-shore facility, but should provide a new facility to cover all needs generated by the individual development. This approach is practical in that it accepts the intermittent nature of some renewable energy sources and the potential to sell excess energy to the National Grid. The approach requires promoters of new development to fund additional renewable or low carbon capacity which might be generated on site or in the locality, equivalent to the forecast energy consumption of the development, and that the additional power created will not be “claimed” by other developers seeking to demonstrate a low carbon solution for their development. In doing so, they are free to enter into the necessary commitment with a supplier of their choice. It is assumed that, in the case of larger developments, many will want to provide for energy production on site and have a hand in the establishment of an ESCO to ensure future maintenance. Enforcement would be through the demonstration of an agreement with an energy supplier, at the point where planning permission is granted, to provide additional capacity through renewable or low carbon technologies and an undertaking to implement the agreement as development progresses.</p> <p>In the case of the final occupiers of the development, provided the arrangements outlined above been entered into, there is no reason why, in taking electricity from the national grid, they should not select their supply according to their own preference.</p> <p>The policy approach for smaller scale development is for it to link to large scale sustainable energy sources or to contribute to a carbon offset fund to provide cost effective carbon reduction solutions where on site achievement of zero carbon standards is expensive. The policy recognises that in some instances it will be technically difficult and extremely expensive to achieve carbon neutrality within a development, particularly in the case of smaller developments where fewer technologies are available. In these instances, where agreement is reached to accept a lower level of onsite carbon reduction or contractually linked off-site provision, the balance would be made up by a contribution to a carbon offset fund set up to offer grants to the occupiers of existing property to improve the energy efficiency of their property.</p>

No.	Question	Response
		<p>The Sustainable Energy study concluded that this approach, rather than setting specific on site renewable energy targets as in RSS14, would be promote low and zero carbon development cost effectively. This is in line with emerging government policy set out in the consultation document Planning for a Low Carbon Future in a Changing Climate, which permits “allowable solutions”, including off site generation of energy and possibly carbon offsetting, to achieving zero carbon development on sites where there would be a lack of viable on site solutions, such as small-scale infill sites. The range of allowable solutions will be dependent on the government’s final definition of zero carbon homes. The carbon offset fund would only be introduced if the “allowable solutions”, to be defined in the final version of the PPS, permit this, thus taking account of Circular 5/5.</p> <p>The detailed operation of the policy and appropriate contributions will therefore and be set out in Development Management DPDs or through a supplementary planning document after the allowable solutions are known, but it should clearly relate to a calculation of what it would cost to achieve carbon reductions comparable with those “forgone” on site.</p> <p>The fund will be capable of being administered in much the same way as funds received through section 106, or through the CIL process. Funds received through this process would be ring fenced and used solely for “allowable solutions”.</p> <p>A similar process is being established in relation to Rackheath eco community, where an element of the proposal is to improve the energy performance of the existing housing stock through targeted grants. In that instance the grants will be paid through the district council’s small grants fund, though funded through the Programme of Development. It is anticipated that a similar process could be replicated over the wider area, albeit funded through a mechanism such as S106 in the cases where it is not possible to achieve the expected standards on site. Thus although the source of funds would be different, the remainder of the process could replicate that being set up in relation to the eco community</p>
16.	Policy 3: 1 st bullet – what is	See response for Q15

No.	Question	Response
	<p>a 'dedicated, contractually linked decentralised and renewable or low carbon source? How can development be linked permanently into a particular contract, and is this reasonable? How would it be monitored and enforced? What is the low carbon infrastructure fund? How is this 'justified' and how will it work? [see also 5.18]</p>	
17.	<p>Policy 3: 2nd bullet – what is the carbon offset fund? How is it 'justified' and how will it work? [see also 5.18]</p>	<p>See response for Q15</p>
18.	<p>Is it consistent with Circular 05/05 to use the fund to (a) improve the energy efficiency of existing houses (para 5.16) or (b) address current service and infrastructure deficiencies (introduction to policy 10)?</p>	<p>See response for Q15</p>
19.	<p>Is there sufficient evidence to justify the clarificatory 'Minor Change' making this a 'Strategic Allocation' with boundaries fixed in the</p>	<p>The Partnership believes there is sufficient justification for the proposed change for the reasons given below:</p>

No.	Question	Response
	<p>relevant appendix? Will the whole area be delivered under a 'single coordinated approach' master-planned by a consortium covering all of the area, including any part not included in the eco-town proposal? Is the nature/ mix of the development sufficiently firmly established in the JCS to make the proposed change from an AAP to SPD an appropriate vehicle for implementation?</p>	<p>Evolution of proposal through iterations of JCS</p> <p>Issues and options</p> <ul style="list-style-type: none"> • The issues and options document looked at a number of potential locations for large-scale growth, indicating them on a map [page 31] diagrammatically and describing them in appendix 4. • The north east sector inside the NDR was described, and initial indications highlighted a fairly positive view, but noted that a new secondary school would be likely to require a minimum of 7000 to 8000 new dwellings, and that there are a number of constraints in the area. • The north east sector outside the NDR [vicinity of Rackheath] was described separately, with initial indications being that the area was worth further investigation, particularly in conjunction with development inside the NNDR to provide a network of new "villages" <p>Regulation 25 technical consultation</p> <ul style="list-style-type: none"> • This stage included three options for the broad distribution of major growth in the Norwich policy area, described in appendices 1,2 and 3, though in the case of the north east, all were consistent, proposing a total of 6000 dwellings in the north east [inside and outside the NDR] but rising to 10,000 subsequently. Each option referred to the need for a new district centre including library, education and health facilities, complemented by local centres. Each option also included a new secondary school, bus rapid transit to Norwich city centre, public transport, walking and cycling routes to other destinations, permeability across the NDR and a new rail halt at Rackheath. • Each option included the retention of existing important green spaces and significant levels of heathland recreation. • Each option also included the conservation of historic parkland • The diagrams illustrating the different options show the area diagrammatically but spanning the NDR.

No.	Question	Response
		<p>Regulation 25 public consultation</p> <ul style="list-style-type: none"> • By this stage, the passage of time enabled the base date used in calculating future allocation requirements to be updated, and the scale of allocation needed in the Norwich policy area was reduced from 24,000 to 21,000 • The document included a preferred option based on the reduced allocation requirement, but also included the 3 options from the technical consultation in appendices for people to the compare and comment on. • In the preferred option, the total new allocation in Broadland increased from 8000 to 9000, with the additional thousand being accommodated through the assumption that 7000 dwellings could be delivered in the north east by 2026 rather than the more cautious 6000 assumed earlier. • The description of the area refers to the proposed eco community which was by then being explicitly promoted. The document makes it clear that the delivery of the strategic growth location is dependent on the implementation of the NDR and suggests that the new community should take the form of a series of inter-related new villages/quarters. It also refers to the district centre, secondary school, retention of green spaces, historic park land, NDR permeability, Rackheath rail halt, bus rapid transit, public transport walking and cycling links in broadly the same terms as in the technical consultation. • The diagram illustrating the preferred option in appendix 0 [page 69] shows the northeast strategic growth location as a defined form, extending from the existing urban fringe to the NDR, except in the Rackheath area where it extends beyond the NDR in the form promoted in the eco community proposal. <p>Pre Submission Publication.</p> <ul style="list-style-type: none"> • At this stage, the key diagram again indicated the Growth location in a diagrammatic way. • However, appendix 5 includes a map on an ordnance survey base showing the extent of the growth triangle • Appendix 3 shows superseded policies and refers to changes to local plan proposals maps, published separately. One of these shows the identification of the growth triangle and the NDR as a proposed change to the adopted Broadland Local Plan Proposals Map.

No.	Question	Response
		<ul style="list-style-type: none"> • The policy text describing the growth triangle elaborates in more detail. For all locations it includes general expectations including green infrastructure links to surrounding areas, consideration of the potential to include gypsy and traveller sites, modal shift, sustainable drainage, on site or nearby renewable energy, local services and facilities, telecommunications and other utility infrastructure. It also includes location specific expectations, in the case of the north east, similar to the expectations in earlier versions of the JCS. In some respects, it is more explicit, indicating employment allocations within the triangle including expansion of the employment area at Rackheath, the need for an area north of Rackheath as an ecological buffer to protect the broads SAC, the potential for green roofs, rail halts at Rackheath and Broadland Business Park and a new household waste recycling centre. It gives guidance on future school and early years provision, and the restoration and conservation of historic and ecologically important green areas. The policy also refers to the need for a coordinated approach across the whole area with more detailed masterplanning required for each quarter • The supporting text at paragraph 6.14 refers to the fact that an area action plan was being prepared, and also referred to the Government's proposals for an eco community. <p>Pressures to deliver growth quickly</p> <ul style="list-style-type: none"> • Land supply <ul style="list-style-type: none"> ○ Planning Policy Statement 3 requires that if local planning authorities cannot demonstrate a five year supply of available and deliverable housing land, based on the provision required by the development plan they should take proactive measures including responding favourably to planning applications to increase the supply. In this instance, before the JCS is adopted, the targets are set by the East of England Plan. ○ The work to quantify the available supply of land had begun, prompted by the submission of a planning application at Norwich Common, Wymondham. Following a refusal of planning permission, this was taken to appeal, which was allowed, largely on the basis of the housing land supply. ○ Work has continued on a land supply statement and the conclusion reached, at a base date of 1 April, 2009, was that, at the time, there was a supply of 6,609 dwellings

No.	Question	Response
		<p>compared with a requirement of 9,115, or 3.63 years in the Norwich policy area.</p> <ul style="list-style-type: none"> ○ There is thus a clear need to be able to respond as quickly as possible to any resurgence in the housing market in a way which will not prejudice the planning strategy for the area. ○ The urgency with which the development industry views the need to progress matters can be illustrated by the fact that in March 2010, there were separate developer led events explaining their development proposals at Wymondham and Hethersett. <ul style="list-style-type: none"> ● Eco town proposal <ul style="list-style-type: none"> ○ In July, 2009, the Government published a supplement to Planning Policy Statement 1 on eco towns. This identified locations with the potential to be eco towns, including Rackheath. Paragraph ET4.1 states “Eco-towns should be allocated as a strategic development option within the core strategy”, though the following paragraph acknowledges that there is no requirement to allocate an eco town if a better way of meeting future needs exists. Where a core strategy is already adopted, not applicable in this instance, the PPS supplement indicates that eco towns could be considered for inclusion in an area action plan. ○ A Programme of Delivery was submitted in a November, 2009. A sum of £ 10.2 million pounds was awarded for 2009/10. A bid for 2010/11 funding of up to £6m is currently being considered by Government. ○ A planning application for an exemplar scheme of approximately 200 homes is expected to be submitted in autumn 2010 and an application for the first phase of the eco town in spring 2011. ● Remainder of the growth triangle <ul style="list-style-type: none"> ○ Development of the remaining parts of the triangle is dependent on the cooperation of a number of landowners. However, over the development of the JCS, these have largely coalesced into two groups, Broadland Land Trust, represented by Savills, and a group fronted by Bidwells/ Blue Living. Both have submitted co-ordinated representations in response to the publication of the JCS

No.	Question	Response
		<ul style="list-style-type: none"> ○ One of these groups, Broadland Land Trust, has already initiated some preliminary thinking on masterplanning through a scoping event led by the Prince's Foundation for the Built Environment using the Enquiry by Design process. ● Need for overall coordination <ul style="list-style-type: none"> ○ The JCS policy stresses the need for single coordinated approach, with more detailed masterplanning of each individual quarter. The progress of the eco community will be guided by the specific requirements of the PPS 1 supplement .The GNDP, and Broadland District Council, recognize the desirability of the triangle as a whole comprising individual quarters with their own identity, and that this is likely to be best achieved by having a dedicated master plan for each. However, there are certain aspects which need co-ordination across the individual quarters ○ These might include, but are not limited to, strategic green infrastructure, public transport priorities, walking, cycling and public transport links to other nearby areas, provision of and access to a secondary school, permeability across the NDR, the potential for local energy generation and distribution through local distribution networks, location of district and local centres and connectivity between them. ○ It is not simply the spatial location of such elements, but also the timing of the provision which should be coordinated to achieve maximum effectiveness. ○ It is important that development progresses at a reasonable pace, not only in terms of delivery of the scale of development required by the East of England Plan, but also in terms of the appropriate provision of infrastructure to serve the needs of the new development. A prolonged timescale for the development of a planning framework for the growth area, and any resultant slow down in the rate of development, would have a significant impact upon the availability of infrastructure within the growth area. ○ Impacts relating to the availability of infrastructure are likely to be felt disproportionately in earlier developments that are coming forward such as the eco-community. ○ Significantly parts of key infrastructure within the growth triangle are reliant on a larger population than would result from the development of the eco-community alone.

No.	Question	Response
		<ul style="list-style-type: none"> ○ There is a risk that if other development areas lag behind the Rackheath eco-community then higher order services and infrastructure will not be able to be provided at the appropriate stage for this community. ○ In addition greater development rates across the whole of the growth area will mean that services can be supported at an earlier date than might otherwise be the case. This will have benefits for existing residents as well as new ones. ● Experience elsewhere in comparable situations <ul style="list-style-type: none"> ○ In considering how best to proceed, we have tried to look at emerging sound core strategies from other parts of the country to identify recent good practice in dealing with the kind of questions outlined above ○ In particular, we have noticed parallels between our situation and those at Wokingham and north Northamptonshire ○ At Wokingham, the council identify a number of strategic development locations. These are allocated through policies CP18 – 21. The locations are identified in a series of maps towards the back of the document. Though the maps show the perimeter of the location and a broad pattern of green infrastructure, they do not indicate the precise boundaries of the different land uses, but instead are complemented by concept statements. The core strategy and inspector’s report can be seen at http://www2.wokingham.gov.uk/environment/planning/ldf ○ It is clear from these that the individual locations will not be developed throughout their areas. ○ This expectation is clearly set out in the inspector’s report. For example the strategic development location at Arborfield is proposed to contain 3500 dwellings, though the report notes at paragraph 5. 3 that developers argue the site is capable of providing additional dwellings after 2026. ○ The strategic development location to the south of the M 4 is said to comprise urban extensions of three villages with, as noted at paragraph 5.20 retained green areas between them. Paragraph 5.22 notes that the precise boundaries of the development will be defined through master plans. Similar intentions are expressed at paragraph

No.	Question	Response
		<p>5.50 concerning the urban extension at South Wokingham.</p> <ul style="list-style-type: none"> ○ The policies and make clear that this additional detail will be added through a development brief supplementary planning document including a master plan for each location. The core strategy was adopted in January, 2010. ○ At North Northamptonshire the core strategy proposes a number of strategic urban extensions which form the foundation of housing land supply for the future. The key diagram shows these in a very diagrammatic way. The relevant policy, policy sixteen, describes the attributes in a general form, but including employment opportunities, other local facilities, early years, primary, and “where necessary”, development which respects its locality, and a network of green spaces. The inspector clearly considered that an appropriate master planning approach would be an acceptable alternative to the preparation of subordinate development plan documents, from paragraph 97 of his report, <p>“I consider that for soundness and clarification and to avoid delay in bringing forward Sustainable Urban Extensions it should be stated in paragraph 3.68 that as the Core Spatial Strategy already identifies their locations, the alternative to Development Plan Documents of a Master Plan approach would be acceptable. This would be in accordance with Proposed Change C23 and reflects current practice within North Northamptonshire”.</p> <p>Realistic range of choice</p> <ul style="list-style-type: none"> ● The Northern Distributor Road is an integral part of the transportation strategy. Planning permission has not yet been obtained, but the published preferred route has been treated as a fixed constraint. ● The joint core strategy has a clear policy stance of protecting the area’s environmental assets. This is reflected in policy 1, and, in particular in respect of energy and water, policy 2. The specific assets of the growth triangle are referred to in policy 10. These include <ul style="list-style-type: none"> ○ Specific requirements to retain existing important green spaces, restore and conserve historic parkland and important woodland. Policy 10 also requires the provision of a

No.	Question	Response
		<p>significant area north of Rackheath as an ecological buffer protecting the Broads SAC. It also requires bus rapid transit connection to the city centre with a suggested, but not definitive, route, safe and direct pedestrian paths and orbital bus services to specified destinations, and new rail halts at Rackheath and Broadland Business Park.</p> <ul style="list-style-type: none"> ○ The green infrastructure strategy prepared as part of the evidence base for the joint core strategy indicates some priority corridors for the creation of strategic green links. This will also need to be guided by any mitigation requirements in connection with the northern distributor road, and evidence emerging from more detailed biodiversity/habitat survey work. ○ These have to be considered alongside existing constraints shown on Broadland adopted local plan proposals map. These include <ul style="list-style-type: none"> ➤ Airport public safety zone ➤ Historic parkland [in three areas] ➤ County wildlife sites ➤ Ancient Woodland ➤ Areas of landscape value ○ In addition, other practical constraints limit the available options, including forecast Airport noise contours ○ Account will also need to be taken of the practical availability of land in terms of the owners' willingness to sell the land for development. The extent of this constraint may change in the future, but the land put forward in response to a call for sites undertaken by the district council gives an early indication. ○ Proposals, including an indicative masterplan, for the proposed Eco community at Rackheath and a programme of delivery have been prepared and published in accordance with the timetable set by the Government, <p>Taken together, these factors limit the available options, and if the principle of the major urban extension on the scale proposed in this location is accepted, it is considered that it would be more productive to move directly to the masterplanning, firstly in terms of an overall coordinating framework, and then through detailed masterplanning for the individual "quarters". Both of these</p>

No.	Question	Response
		<p>stages should involve significant community involvement.</p> <p>Formal consideration by Broadland District Council</p> <ul style="list-style-type: none"> • The question of how to progress matters has considered by Broadland District Council's Cabinet at its meeting on the 22nd December 2009. The papers are available on the District Council's website. The full report, in sections 8 and 9 looks at the timescales implicit in preparing an Area Action Plan, or moving straight to a Supplementary Planning Document. It concluded that an Area Action Plan might be adopted by winter 2011/spring 2012, while a Supplementary Planning Document could be produced approximately six months earlier. Given the urgency of the need to address the land supply position and ensure coordination between the different elements of the triangle, taking into account the fast track approach advocated for the eco community element, there is a clear benefit to following the SPD route provided the JCS is sufficiently clear to be viewed as an allocation. • In March 2010, Voluntary Norfolk hosted on behalf of CLG a third sector forum in connection with the eco community proposal, illustrating the urgency with which its progress is viewed. A further Public Sector forum involving government departmental representatives is scheduled for May, hosted by Broadland Community Partnership. • The fact that the growth triangle's extent has been clearly demonstrated on an ordnance survey base in the JCS, and the limited range of alternatives open, taking into account the constraints outlined above suggest to the District Council that it can be regarded as a strategic allocation • The District Council has further demonstrated its commitment to facilitating delivery by beginning to consider how its own involvement might most effectively facilitate progress, including an agreement to consider participating through an equity share of the development if that would facilitate matters. • In March, 2010, the District Council confirmed its commitment to a recognized process of masterplanning by initiating the procurement of outside consultants to work with the Council in the delivery of the high level masterplan.

No.	Question	Response
20.	How will provision of the planned transport infrastructure and the various other identified required types of infrastructure be assured?	<p>The first part of this Question is largely covered under previous answers, and in particular those to Question 1-6. For a Core Strategy, the JCS is relatively detailed in its expression of an infrastructure strategy and in relationship to the dependencies of individual developments (particularly Appendix 7). In terms of overall delivery of infrastructure, the JCS addresses this at p.10 and in relation to Policies 6 and 20. The IDP is in preparation and will be the tool for managing infrastructure provision and various funding streams. The IDP work will inform the CIL Charging Schedules.</p> <p>The delivery strategy is clear from the JCS which sets out a range of measures to ensure delivery including the role of the GNDP as the delivery vehicle (para.7.2). Arrangements for joint working with utility providers are set out, together with plans to fund infrastructure through a combination of public investment, asset management plans, CIL and planning obligations and a process for monitoring and review is in place. The JCS also establishes the policy basis for Grampian conditions to be imposed if necessary.</p> <p>While it is recognised that Government funding will be reduced in the early years of the JCS, it is worth noting that the GNDP has already received, or had committed, significant funding for infrastructure through Growth Points, Community Infrastructure Fund, EEDA and the HCA. As noted earlier in the response to question 19, part of the development is proposed as an eco community under the auspices of the Government's programme, initial Programme of Delivery funding has been received and continuing support can be expected. Given the significance of the scale of growth in the Norwich area, ongoing Government funding is likely even in a difficult economic climate.</p>
	In particular, are two new rail halts likely to be achievable?	<p>The rail halts are included in the NATS Implementation Plan. Clearly there is a degree of uncertainty around these, as the active cooperation of the train operating company will be needed, and as the Greater Anglia franchise is currently being re-let the future operating company is not known at this stage.</p> <p>A new rail halt at Rackheath is included in the eco community proposals which also include a proposal for potential tram-train connections to Norwich to include a loop within the new</p>

No.	Question	Response
		<p>development http://www.rackheatheco-community.com/comm_transport.php . Dialogue with Network Rail and the current operator during the Regulation 25 stage indicated interest in the potential offered by tram-train provided current restrictions on the shared use of heavy rail tracks could be overcome.</p> <p>A rail station at Dussindale/Broadland Business Park is an existing policy objective in the Local Plan, which has become significantly more attractive with the continued development of the business park making the area a significant destination. A current planning application for phase 2 of the business park on the northern part of the existing allocation, reference 20090886, includes a site for a railway station. This application is currently held up pending resolution of the need for improved access at the Postwick junction with the A47.</p> <p>The inclusion of two additional rail stations is therefore a reasonable policy stance, although it is accepted that there are always uncertainties inherent in such proposals.</p>
21.	At what level will the NDR pass through the new development (cutting/ embankment/grade)? Will it be possible to achieve real integration of the two parts?	<p>A CD with drawings of the engineering layout and profile of the NDR is provided under separate cover. The key is on drawing 1 while drawings 9 and 10 are of most relevance to this question. Please note these are the most recent plans in the public domain and further, more detailed, design work has taken place and is ongoing to develop cycle and pedestrian links across the NDR and, in particular, at the junctions. Junction design will allow cyclists and pedestrians to cross the NDR safely. Schemes associated with the Rackheath Eco-Community Programme of Delivery 2009 also address cycling and pedestrian access, linking Rackheath to the urban area. Details are also included on the CD.</p> <p>The NDR will be at existing ground level at its junction with the Wroxham Road (A1151), it then goes into slight cutting before coming back to grade south of Sir Edward Stracey Road. The NDR then goes into an approximately 3.5 metre cutting at Newman Road coming back to grade at the junction with Salhouse Road.</p> <p>A green bridge will be provided at Newman Road with footpath, cycle and bridleway links over</p>

No.	Question	Response
		<p>the bridge and along the west side of the proposed NDR going north to Wroxham Road and south to Salhouse Road. These links will help to make the connection from the proposed new residential settlement north of Thorpe End to the proposed Rackheath Eco-Community. In addition a new linkage for pedestrians, cycles and equestrians will also be provided from Plumstead Road, under the new bridge over the Norwich to Sheringham rail line to Green Lane, Rackheath.</p> <p>Meetings between the County Council and developers are ongoing to address permeability issues between Rackheath Eco-community and the NDR. The permeability issues will also shape ongoing work on the GNDP Green Infrastructure Delivery Plan and discussions with surrounding landowners. Consequently, the NDR will deliver a good level of permeability in this area and its design allows this to be strengthened through detailed planning and development management for the Growth Triangle.</p>
22.	<p>Representations suggest that specific growth directions/sites should be identified as part of the JCS, as opposed to being left for identification in future DPDs?</p> <p>Has there been any front-loaded consultation/sustainability appraisal of any such specific directions/sites?</p> <p>What is the timescale for publication of the relevant</p>	<p>Given the complexity of the JCS making a number of strategic allocations would have significantly delayed the strategy. However the work on the growth triangle is sufficiently advanced to make it appropriate as a strategic allocation at this stage. This is answered more fully under question 19.</p> <p>The SHLAA was the subject of consultation with technical bodies and engagement with developers. All three district councils have commenced work on Site Specific Allocation DPDs and two of them have undertaken a 'call for sites' and initial consultation.</p> <p>Timetables for Site Specific DPDs can be found in the authorities' Local Development Schemes.</p>

No.	Question	Response
	DPDs that would deal with these matters?	<p>JCS 16.1 Broadland (amended 13 April 2010)</p> <p>JCS 16.2 Norwich</p> <p>JCS 16.3 South Norfolk</p>
23.	(i) Will the fairly dispersed pattern of development in South Norfolk be the most sustainable that could reasonably be achieved?	<p>The basis for the pattern of development in South Norfolk is described in two topic papers:</p> <ul style="list-style-type: none"> • TP8: Strategy to accommodate major growth in the Norwich Policy Area • TP7: Settlement Hierarchy <p>TP8 (Appendix 3) describes the basis for the chosen pattern of growth in South Norfolk. TP7 “Settlement Hierarchy” describes the choice of locations for the remaining growth. Compared to Broadland district, South Norfolk contains a much higher number of towns and villages in the rural area which are more self sufficient and not socially and economically reliant on Norwich. The submitted strategy acknowledges this and maintains a high degree of sustainability in the resulting dispersed provisions for growth in South Norfolk.</p> <p>Sustainability depends on delivery and risks to delivery are minimised by having a balanced portfolio of large and medium sized growth locations across the Norwich Policy Area as a whole.</p> <p>Overall the strategy recognises that its objectives may involve some conflicts, but the chosen growth provisions are considered to provide the “best fit” in resolving the challenges to be faced.</p>
	(ii) Are Hethersett and Long Stratton allocated more growth than their positions in the hierarchy may suggest?	<p>The Strategy concentrates most growth in the NPA in accordance with the RSS. Outside Norwich, its fringe parishes and their extensions, the limited places suitable for significant growth in the NPA have been based on the settlement hierarchy, i.e. the only defined Main Town (Wymondham) and the next lower level of Key Service Centres (KSCs). Hethersett and Long Stratton are both KSCs and significant centres of population. They are considered to be appropriate locations for major growth due to their wide ranges of local services, good public transport and good access to Norwich and local or strategic employment locations. Long Stratton has the better range of local services and more jobs in the parish, while Hethersett lies on a proposed Bus Rapid Transit route and is very close, and easily accessible, to the Norwich</p>

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	<p>(iii) How does development at Long Stratton contribute to achieving 'a major shift in emphasis across the NPA towards travel by public transport' (RSS policy NR1)?</p> <p>(iv) At what stage would a bypass become necessary?</p>	<p>Research Park.</p> <p>Long Stratton is well served by bus services to Norwich, Diss and Harleston and rural places in between. Significant new development will provide additional potential custom to support further opportunities for bus service improvements, and bus links to Norwich will include improved bus priority measures. These measures will contribute towards the required shift in emphasis towards travel by public transport in the NPA. RSS Policy NR1 is not limited to public transport and places an equal requirement for cycling and walking. Long Stratton has many of the characteristics of a small town with a wide range of services and local job opportunities. Enhancement and improved access to these services is required by the JCS (see in particular Policy 10 and Para 6.13).</p> <p>A commitment to fund and implement the Long Stratton bypass needs to be confirmed before any significant development takes place. Discussions are ongoing with landowners to ensure delivery of the bypass, housing and related facilities.</p> <p>TP8: Strategy to accommodate major growth in the Norwich Policy Area</p>
24.	<p>The JCS provides for 2000 dwellings to be allocated in the Broadland part of NPA and 1800 in the South Norfolk section, including 'possible additions to named growth locations'? This total is presumably to be allocated in (a) the fringe parishes of the Norwich Urban Area (policy 12) – number unspecified, <u>plus</u> (b)</p>	<p>The Joint Core Strategy deliberately provides for flexibility to promote delivery by having a mixed strategy of identifying large and medium sized growth locations (minimum of 1,000 dwellings) plus an allowance for smaller allocations. It provides strategic guidance for the location of this smaller-scale growth.</p> <p>Policy 9 requires allocations to deliver the smaller sites allowance to be made "in accordance with the settlement hierarchy and local environmental and servicing considerations". This will include "possible additions to named growth locations". The settlement hierarchy is set out in paragraph 6.2 of the preamble to Policy 9.</p> <p>Policies 14, 15 and 16 covering Key Service Centres, Service Villages and Other Villages, make it clear that identified settlements in the NPA may be considered for additional development, if</p>

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	<p>the NPA Key Service Centres (policy 14) – totals up to 700 dwellings, <u>plus</u> (c) any small allocations in the fifteen NPA Service Villages (policy 15) – range said to be 430-860. The question therefore arises – does the JCS provide sufficient guidance for the co-ordinating mechanism to be applied to ensure the effective allocation of 3800 dwellings across these areas?</p>	<p>necessary, to help deliver the smaller sites allowance. Paragraphs 6.45, and 6.58 explain that guideline quantities for each tier will only be exceeded having had regard to higher order settlements. The guidelines total 200-300 dwellings for the 3 NPA Key Service Centres that are not identified for major growth, and a further 150-300 dwellings in the 15 NPA Service Villages. Consequently, the broad locations for up to 600 of the 3,800 are indicated.</p> <p>The SHLAA identifies plenty of opportunities for delivering the small sites allocations dwellings at a range of scales of development and at all levels of the hierarchy.</p> <p>The residual allowance of 3,200 or so represents only 15% of the total for new allocations or only 10% of the total new commitment. It is considered that this approach provides a balance that is appropriate for a strategy between the identification of the broad locations for the majority of growth and flexibility to aid delivery and maximise choice.</p>