

Greater Norwich Development Partnership

Matter 1 (A) Legal requirements and (B) The spatial vision and the spatial planning objectives (JCS parts 01 & 04, including the key diagram at p29)

Note: EIP93 sets out the minor changes to the text of JCS1 to address revocation of the Regional Spatial Strategy.

(A) Legal requirements:

A1 Has the Joint Core Strategy (JCS) been prepared in accordance with the relevant Local Development Schemes?

1. The Local Development Scheme: Broadland (2010, JCS 16.1) includes a profile of the JCS (page 13). The profile is valid, although the timing of the Examination means adoption is likely to be slightly later than previously anticipated, and it is no longer necessary to conform to the Regional Spatial Strategy.
2. The Local Development Scheme: Norwich (2010, JCS 16.2) includes a profile for the JCS (page 10). The profile is valid, although the timing of the Examination means adoption is likely to be slightly later than previously anticipated, and it is no longer necessary to conform to the Regional Spatial Strategy.
3. The Local Development Scheme: South Norfolk (2007, JCS 16.3) provides a profile of the purpose and status of, area covered and production timetable for the JCS (Appendix 2/ p24). The profile is valid, although the timing of the Examination means adoption is likely to be slightly later than previously anticipated, and it is no longer necessary to conform to the Regional Spatial Strategy.

A2 Does the evidence (including the Regulation 30(d) and 30(e) statements and the GNDP's self-assessment paper) show that the JCS has been prepared in compliance with the Councils' Statements of Community Involvement?

1. The Statement of Compliance with Adopted SCIs (JCS5) sets out how the process has addressed the requirements of the partner authorities' Statements of Community Involvement. This takes account of the update to the Broadland SCI published in 2008 (JCS

5.2, which updates JCS 5.1, reflecting changes in the plan making system introduced by amended regulations published in 2008), the SCI's for Norwich (JCS 5.3) and the SCI for South Norfolk (JCS 5.4). Details of the engagement at Regulation 25 stage (covering technical and public consultations) are set out in JCS 7.1 in compliance with regulations 30 (1) (d). This includes summaries of the methodologies and events held. JCS 10 is a summary of the representations received at the pre-submission publication stage in compliance with regulation 30 (1) (e) (i). The document includes details of the period allowed for representations and details of the local advertisements.

2. Documents JCS 6 to JCS 12 (please note the numerical analysis in JCS 7 contains errors and is replaced by JCS 7.1) also summarises the results of the consultation. JCS 8 includes, from page 171, a section including a summary of the changes made to the document as a consequence of technical consultation at the Regulation 25 stage. JCS 9 includes a corresponding section for the Regulation 25 public consultation, from page 397. In both documents the changes are highlighted in red text.
3. Because the JCS was commenced under previous regulations, there was also a full round of engagement at the issues and options stage. JCS 6 describes the methodology and outcomes.
4. The Soundness Self Assessment (EIP 95) ensures that evidence requirements are met and that we fully comply with statutory requirements.

A3 Has the JCS been prepared in accordance with the requirements of the 2004 Regulations (as amended) including those concerning the publication of the prescribed documents, their local advertisement and availability for inspection, the notification of DPD bodies, and the provision of a list of superseded saved policies?

1. The Soundness Self Assessment (JCS 13) summarises the process through which compliance with the regulations was achieved, with Appendix 1 focusing on legal compliance. The evidence base includes the documents made available for inspection, summaries of the outcome, and the methods used to publicise the JCS at various stages, including the bodies contacted. The documents published can be found at STA 2 (Issues and Options consultation) STA 4 (Technical Regulation 25 consultation), STA 6 (Regulation 25 Public consultation). For the results of consultation at various stages, please see documents JCS 6 to JCS 12 (please note the numerical analysis in document JCS 7 contains errors and is replaced by JCS 7.1). Evidence of individual advertisements, the list of DPD bodies, or letters sent to DPD bodies at particular stages can be produced if

required.

2. Appendix 3 of the submitted JCS (JCS1) includes a list of superseded policies.
3. The regulation 30 (1) (e) statement (JCS 10) summarises the results of the pre-submission publication response.
4. Following issues raised at the exploratory meeting a series of potential focussed changes to the JCS was published for comment in July/August 2010. A report summarising the outcome (EIP 90) was produced to assist the GNDP authorities to decide whether to submit focussed changes to the examination.

A4 Have Sustainability Appraisal (SA) and Appropriate Assessment (AA) been undertaken, the latter under the Habitats Directive?

1. The Sustainability Appraisal of the pre-submission JCS is document JCS 3.
2. The sustainability appraisal process is iterative. SA reports were produced at key stages of the strategy's production in order to guide succeeding stages. The SA reports for the Issues and Options stage, the Preferred Options stage (prepared before the change in the plan making process in 2008), and the Regulation 25 stage documents are EIP 12, EIP 13, and EIP 14 respectively.
3. At the Issues and Options stage a separate summary/ publicity leaflet was published introducing the SA with information on where to find the full document online, and inviting comments on it. The covering letters to general and specific bodies sent in November 2007, highlighted the availability of the SA and invited comments on its scope.
4. At the Regulation 25 stage the availability of the SA was highlighted in the Regulation 25 technical report. The Regulation 25 public consultation was specifically extended in view of the public interest and when it became apparent that the initial mail out had not drawn attention to the ability to comment on the SA explicitly enough.
5. This previous work was independently verified by Scott Wilson. At the Regulation 27 stage a formal SA report, prepared by Scott Wilson, was published (JCS 3).
6. A supplementary SA (EIP 53) was undertaken by Scott Wilson in relation to the published Statement of Focussed Changes (EIP 51) produced in response to the exploratory meeting, examining the impact of the changes compared to the submitted JCS. It was published for comment alongside the Focussed Changes.

7. Following a task 1 test of likely significance (document ENV 1.1), a task 2 Appropriate Assessment under the Habitats Regulations was undertaken (document JCS 14.1)
8. JCS 14.2 includes a statement from Natural England. This response will be updated prior to the Hearings.

A5 Has the JCS had regard to the sustainable community strategies for the area adopted by the County Council, the City Council and the two District Councils?

1. Yes. The vision and objectives were directly derived from those in the Sustainable Community Strategies. These are included within the submission documents at JCS 17.1 to 17. 4
2. From the outset the Local Strategic Partnerships (LSPs) were involved, as can be seen from the Issues and Options report of consultation (JCS 6), appendix 1: workshop on community life issues, and appendix 2 meetings on 7 February 2007, 9 May 2007, 25 July 2007 and 30 January 2008. The Regulation 25 Report of Consultation with Addendum (JCS 7.1) indicates the stakeholder meetings undertaken (appendix N), including joint meetings of (LSPs) held in September 2008, March 2009, May 2009, and June, 2009, the latter two jointly with Local Development Framework working parties.

(B) The spatial vision and spatial planning objectives (JCS parts 01 & 04 and the key diagram):

B1 Are the spatial vision and objectives at part 04 of the JCS (and the strategy depicted on the key diagram at p29 of the JCS) justified, effective, and consistent with national policy?

1. In JCS1, the spatial vision and objectives in section 04 should be read in conjunction with the section entitled "Our Strategy" at section 01, which articulates the underlying reasons why growth is needed in the area, and the resultant dilemmas. It highlights some of the challenges faced and the underlying principles running through the Strategy to tackle them. Section 03, the spatial portrait, highlights the characteristics of the area in terms of its environment, demography, economy and communications.
2. The JCS is justified by being consistent with the adopted Sustainable Community Strategies for Norfolk, Broadland, Norwich and South Norfolk, and subsequent testing through the various

consultation exercises. The responses at the Regulation 25 public stage relating to the vision and objectives are summarised in JCS 9 (pages 3 to 31) with the amendments to the vision and objectives made, as a consequence, summarised on pages 405 and 406 of the same document.

3. The Government Office is represented on the monthly GNDP Directors' group meetings and attended the GNDP Policy Group meetings.
4. Government Office did not suggest any conflict with national policies. At the Issues and Options stage they made no substantive comments on the potential spatial vision and objectives. At the Regulation 25 stage the Government Office made a number of comments on the spatial vision and objectives, though none of these challenged the vision's consistency with national policy - the suggestions were more in the nature of potential improvements. There were no representations from the Government Office relating to the spatial vision and objectives at the pre-submission stage.
5. The effectiveness of the spatial vision is demonstrated through the objectives derived from the vision which themselves link to policies in the strategy. Each policy contains a list of the spatial planning objectives to which it contributes.
6. Proposed minor changes (JCS2 and EIP93) address drafting errors and provide clarity.

B2 Was there adequate identification, consultation upon, and testing of 'reasonable alternative' spatial visions and strategies before the formulation of the submitted JCS? Is there a clear audit trail demonstrating the decision-making process by which the spatial vision and objectives of the submitted JCS were arrived at? If (in any aspect) a balance was struck between competing spatial alternatives, is it clear how and why the selected balance was struck?

Vision

1. The initial stages of the JCS preparation took the form of a number of workshops including one focussed on vision and objectives. Document STA1, a composite of the topic papers produced at this stage, includes (at electronic page 31) the topic paper covering the spatial vision and objectives. This explains that the need to have regard to the vision and objectives in adopted Sustainable Community Strategies sets parameters but, within those parameters, looked at a range of potential vision and objective statements.

2. The Issues and Options consultation stage included consultation on a potential vision and objectives through the media of the full consultation document and a summary leaflet delivered to all addresses in the strategy area. The main document (STA 2) includes (from page 14) a draft spatial vision followed by draft objectives. While these were not presented in alternative form, questions invited respondents to indicate support or opposition, with an open question inviting suggestions on how the vision or objectives might be changed or improved. The results of the Issues and Options consultation (STA 3/JCS 6) show, in relation to the full questionnaire, an almost two to one level of support over objections for the draft vision. There is also a range of comments in appendix 7, many of which have subsequently been incorporated to strengthen the vision and objectives, while some reflect overall opposition to the Strategy, and others are mutually inconsistent. In relation to the objectives, in the same appendix, the response to question 2 shows a more than 2 to 1 expression of support. With regard to the summary leaflet, the same document records (on page 54) a level of support for the draft vision exceeding 80%, with many of the comments made reflecting those in the responses to the full document. Document STA 3/ JCS 6 lists:
 - workshops held (appendix 1)
 - a number of stakeholder meetings held at the initial stages of strategy preparation including those with LSPs and LSP coordinators (appendix 2)
 - the outcomes of a youth conference all of which helped to highlight specific issues to test the initial drafting of the vision and objectives (appendix 4)
3. The spatial vision and objectives were subject to further testing at the Regulation 25 public consultation stage. Document JCS 7.1 summarises the response (page 107). At this stage there was a more balanced response, though many of the same issues were raised as in previous consultations. Document JCS 9 includes details of the individual submissions made and a response to the individual representations, together with a note of where a change to the strategy would be beneficial. In relation to the question on spatial vision and objectives, the Actions Summary (page 405) indicates how the changes have been incorporated into the strategy between the Regulation 25 and pre-submission publication stages, (though in some cases the amendments have been to policies rather than the vision/objectives).
4. While many of the principles of the vision have remained unchanged, significant elements have changed, particularly those relating to the spatial distribution of development. As the Strategy has progressed from Issues and Options through a draft Preferred Options stage to Regulation 25 and Submission, the spatial aspects of the vision in particular have reflected evolving thinking

in terms of the spatial strategy.

Spatial strategy

5. The identification, consultation upon and testing of reasonable alternative spatial strategies and competing growth locations is referred to in EIP86, which refers to the audit trail and Sustainability Appraisal contexts behind the derivation of the favoured growth strategy option in the Norwich Policy Area (NPA).

Within EIP 86:

- Appendix 1: Summarises the audit trail to Option 2+
 - Appendix 2: Details the audit trail showing the consideration of the evolution of growth options
 - Appendix 4: TP8 “Strategy to Accommodate Major Housing Growth in the Norwich Policy Area” – revised Chapter 6 “Evolution of the Favoured Option”.
6. A wide range of alternative criteria were consulted on to define the Settlement Hierarchy.
 7. The distribution of growth (below the level of major growth locations) was considered, as described by TP7: Settlement Hierarchy. This included the consideration of alternative distribution options as shown by TP7, Appendix 3. Housing development provisions for a limited number of individual Main Towns and Key Service Centres, and significant changes to the definitions of “Service Villages” and “Other Villages” deemed to be suitable for sustainable development, were revised in the pre-Submission JCS (JCS 1) following the results of the Regulation 25 technical and public consultations, evidence studies and the settlement hierarchy review of villages.
 8. At the Issues and Options stage there were questions inviting people to comment on the criteria for selection of Main Towns (at that stage referred to as Market Towns) and Key Service Centres. There was substantial agreement with the criteria as recorded in document JCS 6, page 71. This consultation on criteria was used to define the Settlements.
 9. At the Issues and Options stage there was a specific question inviting people to comment on the criteria for defining “secondary rural settlements” suitable to accommodate modest growth. The response at this stage was a declared preference for such settlements to benefit from specific services, with the top 4 being:
 - a. Daytime public transport
 - b. A village hall
 - c. A convenience/food store
 - d. A primary school

(See document JCS6 page 72 for the full analysis)

10. These criteria were those initially adopted to define service villages at the Regulation 25 stage, though by then the secondary rural settlements, a category drawn from the East of England plan, had been divided into Service Villages and Other Villages to take account of local circumstances. Thus the alternative attributes of the rural settlements, deemed suitable to accommodate some modest development, was established through consultation early in the process. At the Regulation 25 stage, the selection of settlements in these categories was generally supported. There were challenges but few, if any, argued that a range of local services was not a relevant consideration in defining them (see JCS 7.1 page 122 and 123).
11. Each iteration of the JCS growth strategy was approved by Members of the GNDP Policy Group, having been informed of the supporting evidence and implications, and considered by the GNDP partner authorities prior to each public or technical consultation.