

Date: 21st October 2013
Our ref: 9 [REDACTED]
Your ref:



Sandra Eastaugh
Partnership Manager
Greater Norwich Development Partnership

Natural England
Consultation Service
Hornbeam House
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BY E-MAIL ONLY

Dear Ms Eastaugh

**The Town and Country Planning (Local Planning) (England) Regulations 2012
Statement of Representations Procedure – Joint Core Strategy for Broadland, Norwich and
South Norfolk: Suggested Main Modifications**

**Publication of Suggested Main Modifications, Additional (minor) Modifications, Addendum to
the Sustainability Appraisal and Addendum to the Habitats Regulations Assessment**

Thank you for consulting Natural England on the above in your letter dated 6th September 2013.

We note that the only modification that reflects a decision to alter the policy approach of the Part JCS is Main Modification 2 which proposes the addition of two new policies: Policy 21 is essentially a commitment to take a positive approach when considering development proposals within the Broadland part of the Norwich Policy Area (NPA) and Policy 22 identifies that if there is a significant housing shortfall the Councils will produce a short focused Local Plan which will have the objective of identifying and allocating additional locations within the whole NPA area for immediately deliverable housing land to remedy that shortfall. The NPA will thus allocate additional sites to those identified through the JCS / Part JCS. The SA Report Addendum (September 2013) identifies that these are likely to be dispersed and relatively small scale and that whilst over the plan period the quantum of growth would be similar, in the longer term more growth could result if all allocated sites are eventually built out.

The SA Report Addendum concludes negative or uncertain implications for environmental objectives, including biodiversity. A more dispersed approach to housing has less potential to deliver coordinated (and hence high quality) green infrastructure. The focused Local Plan also has the potential to lead to more development in the long term (i.e. there would be development at both strategic and smaller sites) resulting in potential negative implications for biodiversity. However, we are satisfied that the focused Local Plan, through the SA and HRA processes, will offer the potential to avoid/mitigate adverse environmental effects.

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As we have already advised Mike Burrell of Norwich City Council, we are satisfied with the HRA Addendum and, in particular, recognition that whilst policies 21 and 22 are unlikely to have a significant effect on European sites, should there be a need for a Norwich Policy Area Local Plan as a result of Policy 22, this would need to be subject to HRA. Natural England is satisfied with this subject to inclusion of this requirement within Policy 22. Subject to this being addressed, we are satisfied with the conclusion of the HRA Addendum that the main modifications will not lead to any effects on European Site which have not already been assessed in the February 2010 report and the 2012 Supplementary Note and that the February 2010 report and the 2012 Supplementary Note can be relied upon as a sound assessment under the Habitats Regulations.

I hope that these comments are helpful. For any correspondence or queries relating to this consultation only, please contact me using the details below. For all other correspondence, please contact the address above.

Yours sincerely

Janet Nuttall
Land Use Operations

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