

Summary of Representations made under Regulation 20, with Officer Response

In the following table the respondents are categorised under “Type” to provide an indication of the distribution of organisations and individuals that have responded:

I = individual

U = service provider, utility company

G = Government agency

D = developer, landowner (or their representative)

PC = Parish Council

N = neighbouring authority

IG = interest group

P = Political party

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
12336	Robert Forster	I	S		Support with respect to other Villages	Support noted
12337	Bob Barker	I	S		Support	Support noted
12338	NATS CTC	G	No comment		No comment	Noted
12339	Anthony Foottit	I	O		Object to concentrated growth strategy, favour dispersal to small villages	Objection noted. Dispersal strategy assessed as part of the SA process and discounted as not being a reasonable alternative.
Detailed Officer Response:						
<p>12339.1. The potential for dispersal of the housing numbers was fully considered as part of the process of identifying Reasonable Alternatives. This consideration supported the conclusions that there was no scope for further dispersal to South Norfolk or Norwich, and that the appropriate level of dispersal within the Broadland part of the Norwich Policy Area was 2,000, with the remaining development dealt with through strategic scale growth. The dispersed 2,000 within the Broadland part of the NPA forms part of the proposed submission. The detail behind these conclusions is set out in 4.5 & 4.6 of the SA Report and Appendices E, F, G & H of the Technical Annex of the SA Report.</p>						
12340	Jean Rackham	I	O		Object – support SNUB views	Objection noted
12340.1. See response to SNUB representation ref 12425						
12341	Paul Rayner	I	O		Concern that infrastructure and services will not be able to cope with scale of growth in the north east	Objection noted. Strategy provides for necessary infrastructure.

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Detailed Officer Response:						
12341.1. Objection noted. The strategy provides for necessary infrastructure. Concentrated growth in the north east provides the best opportunity to support and deliver new infrastructure. Infrastructure needs are set out in Appendix 7 of the adopted JCS and expanded and kept up to date in the Local Infrastructure Plan and Programme.						
12342	Maria Phillips	I	S		Support	Support noted
12343	Badger Building	D	S		Support	Support noted
12344	Mrs C Wade	I	Comment		Concern over condition of road and water infrastructure	Concern noted. Road and water infrastructure maintenance are outside the scope of this strategy. The strategy provides for new infrastructure to serve new development.
12345	Alistair Grieve	I	NA		Raises a number of local issues beyond the scope of the consultation	NA
12346	Duncan Smith	I	O		Object to scale of growth proposed. General comments on need for sustainability measures if houses built and for low cost and rented housing.	Objection noted. Strategy provides for necessary infrastructure and requires sustainability measures and affordable housing.

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
Detailed Officer Response:						
<p>12346.1. The level of housing provision was not remitted by Ouseley LJ. It remains part of the adopted Joint Core Strategy and is not included in the proposed submission text.</p> <p>12346.2. As part of the SA/SEA process, the evidence for the level of housing requirement has been reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document "Topic Paper Homes and Housing August 2012" supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains valid.</p> <p>12346.3. No alternative analysis, supported by evidence, has been submitted to demonstrate that a lower level of housing provision is justified.</p> <p>12346.4. The strategy provides for necessary infrastructure. Concentrated growth in the north east provides the best opportunity to support and deliver new infrastructure. Infrastructure needs are set out in Appendix 7 of the adopted JCS and expanded and kept up to date in the Local Infrastructure Plan and Programme. The adopted policy is to provide 33% affordable housing.</p>						
12347	Mr Stimpson	I	NA		Raises a number of issues beyond the scope of the consultation	NA
12348-50	Mark Rundle	I	NA		Raises issues relating to the settlement hierarchy concerning Alington and Yelverton which are beyond the scope of this consultation	The status of Alington and Yelverton within the settlement hierarchy has already been established in the adopted JCS and is not a matter for consideration in this

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						consultation.
12351-2	Rosemary and George Bennett	I	O		Object that scale of growth proposed is unnecessary, also concern over food security.	Growth targets are evidence based. Growth locations avoid higher grade agricultural land.
<p>Detailed Officer Response:</p> <p>The level of housing provision was not remitted by Ouseley LJ. It remains part of the adopted Joint Core Strategy and is not included in the proposed submission text.</p> <p>As part of the SA/SEA process, the evidence for the level of housing requirement has been reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document "Topic Paper Homes and Housing August 2012" supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains valid.</p> <p>No alternative analysis, supported by evidence, has been submitted to demonstrate that a lower level of housing provision is justified.</p> <p>The ability of Norwich to accommodate additional, re-distributed, development was evaluated as part of the identification of Reasonable Alternatives. This concluded that, given 8,600 additional dwellings are already planned for Norwich city, no additional capacity could reasonably be considered to exist. This evaluation can be found in Appendix E of the SA Technical Appendix. In order to meet housing need, development of agricultural land is necessary. The strategy largely avoids development of high grade agricultural land. Avoiding development of agricultural land in this area is unsustainable because it would not meet social and economic needs or would involve building on Greenfield land not in agricultural use which would compromise environmental considerations.</p>						
12353	Tim Spurrier	I	Clarification sought on objection.	No further information has been provided.	The respondent refers to a QOTC Survey. Clarification has been sought but no further	See below

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					information has been provided	
Detailed Officer Response:						
<p>Despite considerable effort, officers have been unable to locate the quoted survey. However there is considerable local evidence to show that the amount of development planned for Norwich through the strategy is appropriate. The ability of Norwich to accommodate additional housing development was evaluated as part of the SA main report at 4.5.13 (page 35) and detailed in Appendix E of the SA technical annex. This sets out that the emerging Norwich Site Allocations Plan has confirmed the evidence of the earlier Strategic Housing Land Assessment which informed the original JCS. There is capacity for 3,000 dwellings in the city in addition to the 5,500 that are currently allocated or have planning permission. No additional capacity could reasonably be considered to exist beyond the 8,500 dwellings already planned for Norwich without undermining the supply of land for other uses necessary to retain Norwich's role as a regional centre and to ensure a good quality of life for its residents.</p>						
12354	Water Management Alliance	U	NA		Housing development could have an effect on Internal Drainage Board infrastructure. Mention of IDBs in JCS would be welcomed.	Flood risk and progressive water efficiency policies are set out in the adopted JCS and are not a matter for further consideration in this consultation. However, we will continue to work with IDBs through county wide flora.
12355-6	Thelma and Mr Macfarlane	I	Comments		Raises a number of local infrastructure issues, many beyond the scope of the consultation.	Comments noted. Strategy provides for necessary infrastructure and requires sustainability

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						measures and mixed communities in new housing.
12357	Robert Newton	I	O		Object that scale of growth proposed is unnecessary.	Growth targets are evidence based.
Detailed Officer Response:						
<p>The level of housing provision was not remitted by Mr Justice Ouseley. It remains part of the adopted Joint Core Strategy and is not included in the proposed submission text.</p> <p>As part of the SA/SEA process, the evidence for the level of housing requirement has been reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document "Topic Paper Homes and Housing August 2012" supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains valid.</p> <p>No alternative analysis, supported by evidence, has been submitted to demonstrate that a lower level of housing provision is justified.</p>						
12358	Moira Rowe	I	O		Object that growth will cause the mass destruction of the beautiful Norfolk countryside.	Objection noted. Adopted JCS contains policies to ensure new development minimises impact on the landscape.
Detailed Officer Response:						
<p>Developing greenfield land is unavoidable in this area to meet housing need. The ability of Norwich to accommodate additional, re-distributed, development was evaluated as part of the identification of Reasonable Alternatives. This concluded that, given approximately 8,600 additional dwellings are already planned for Norwich city, no additional capacity could reasonably be considered to exist. This evaluation can be found in Appendix E of the SA Technical Appendix.</p>						

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The strategy minimises development of the most sensitive countryside. The scale of the growth triangle allows for the retention of those heritage landscape assets and characteristics which are considered to be most important, for example woodland and historic parkland.						
12359	Cringleford	PC	S		Support	Support noted
12360-1	Mr and Mrs Hammond	I	NA		Comment concerning wanting to build in Kirby Bedon.	Comment noted. This issue is outside the scope of this consultation, so comments will be forwarded to South Norfolk Council for further consideration.
12362	Jay Haycocks	I	NA		Concern over local issues in Aylsham	Comments noted. These issues are outside the scope of this consultation.
12363	Valerie Chipperfield	I	Comment		Concerns relating to roads, sewers, schools and doctors surgeries.	Comments noted. Strategy provides for necessary infrastructure to support new housing.
12364	David Clarkson	I	O		Object to proposed location of growth north of Norwich. Favour locations to south of Norwich with better transport links and other infrastructure	Objection noted. Strategy provides for growth in a number of strategic locations to ensure delivery of housing and minimise

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						need for additional infrastructure.
Detailed Officer Response:						
<p>Alternative strategies to redirect both small scale and strategic growth within the Norwich Policy Area south of Norwich were considered as part of the process of defining reasonable alternatives within the Sustainability Appraisal Report.</p> <p>All options for growth south of Norwich were considered in the main SA report (see section 4.9). In the majority of cases the adopted JCS approach was considered to take up any available capacity for housing growth.</p> <p>The South-West Sector was considered to have capacity for large scale strategic growth. Consequently, it was identified as a reasonable alternative and tested against the other reasonable alternatives, which focused development to the north-east of Norwich. However, because of the number of growth locations in the surrounding area (e.g. Hethersett and Wymondham) there were concerns about the likely deliverability of the south-west alternative. There were also concerns about the impact upon the form and character of settlements along the A11, the limited opportunities for enhancement of GI links and the fact that resultant levels of growth which would need to occur in the north-eastern sector would not support high quality, BRT, public transport services.</p> <p>Therefore, whilst fully considered, it was determined that much of the Norwich Policy Area lying south of Norwich was unsuitable for significant further development, and that where opportunities existed, these did not perform as well in sustainability terms as other alternatives to the North East of Norwich.</p>						
12365	Mr A Walker	I	S		Support locations for strategic growth and maximised use of brownfield sites. Potential for new development in Drayton to provide new village centre.	Support noted. Comments re Drayton will be passed to Broadland.
12366	Broads Authority	N	S	Support subject to water and green infrastructure	Support subject to water and green infrastructure needs set	Support noted. Adopted JCS provides

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				needs set out in JCS being met.	out in JCS being met.	strategic framework for implementation of water and GI measures.
12367	Blofield Parish Council	PC	S	Support, but reluctant to have more housing growth than the JCS minimum.	Support, but reluctant to have more housing growth than the JCS minimum. Sites providing up to 30 dwellings favoured. Concerns over road and school infrastructure capacity.	Support noted. Broadland DC Site Specific plans will identify sites to provide for housing growth. Adopted JCS provides for necessary infrastructure to support new housing.
12368	Keymer Cavendish on behalf of Old Grange Farm Landowners	D	S		Support. Favour strategy which provides for flexibility and does not cram future growth within line of planned NDR.	Support noted.
12369	Highways Agency	G	No Objection		No objection as previous strategic approach retained.	Lack of objection noted.
12370	NATS Civil Aviation Authority	G	NA		No longer need to be consulted on strategic planning matters	Noted
12371	Rockland St Mary with Hellington Parish Council	PC	No Comment		No Comment	Noted
12372-	Lothbury	D	O	Need pre-NDR strategy	Soundness objection as	Objection noted.

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12373	Property Trust			i.e. phase southern part first	strategy is over dependent on delivery of the NDR, which is not guaranteed. Growth should be phased so that the southern part of the growth triangle is developed first.	Strategy enables limited growth north east of Norwich prior to delivery of NDR. Funding has been committed to NDR.
<p>Detailed Officer Response:</p> <p>The Joint Core Strategy and this resubmission of the remitted parts have had regard to the plans and programmes of other Authorities. The NDR is a major scheme promoted by Norfolk County Council and is an important consideration in the determination of the growth strategy promoted. When the JCS was examined in November 2010 the relationship between growth and the NDR was fully debated. To allow for the degree of uncertainty that surrounded funding and delivery of the NDR at that time a Contingency section (Paras 7.11 to 7.18) was added to the strategy and adopted.</p> <p>Whilst the NEGTS was remitted the NDR was not. Since the JCS examination in November 2010, the NDR has been given programme entry status and government have awarded funding of £89m to the scheme.</p> <p>There are still statutory processes to be gone through including planning permission, however the funding situation is far more certain and since the adoption of the JCS the certainty of delivery of the NDR has significantly increased. The contingency strategy remains and sets out a robust strategy for dealing with delay or non delivery of the JCS.</p>						
12374/5	Andrew Cawdron	I	O		Object to scale of growth north east of Norwich, to the NDR and to the environmental consequences. Suggest potential for growth at Acle or dispersed growth north of	Objection noted. Strategy provides for growth in a number of strategic locations, including north east of Norwich to ensure

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					Norwich served by low speed distributor road.	delivery of housing and minimise need for additional infrastructure. The NDR is a key element of the strategy and will enable public transport improvements.
Detailed Officer Response:						
<p>The level of housing provision was not remitted by Ouseley LJ. It remains part of the adopted Joint Core Strategy and is not included in the proposed submission text.</p> <p>As part of the SA/SEA process, the evidence for the level of housing requirement has been reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document "Topic Paper Homes and Housing August 2012" supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains valid.</p> <p>No alternative analysis, supported by evidence, has been submitted to demonstrate that a lower level of housing provision is justified.</p> <p>Growth across Norwich is dependent on the implementation of the NATS strategy to manage travel demand. A key element of NATS is the NDR which will prevent unnecessary through trips and provide the capacity for the introduction of measures to support buses, walking and cycling. Without the introduction of the NDR and NATS the local impact of large scale growth in the north east would be unacceptable. Even with NATS and the NDR in place, an additional transport link connecting Broadland Business Park to Norwich International Airport via new growth areas will be required to provide local access and afford the opportunity to deliver fast and direct public transport and cycling facilities. This link in itself does not replace the need for the NDR.</p> <p>See response to Norfolk Architects Association in relation to Acle (representation 12418).</p>						
12376	CPRE	IG	O		Soundness objection. Dispute	Objection noted. Whilst

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					<p>overall scale of growth and by implication the figure of 9,000 for Broadland, and the evidence base and forecasts behind it. Changes in economy should have been reflected in changed housing targets. Forecasts for new housing demand have been consistently wrong as evidenced by the lack of delivery of housing numbers in comparison with targets since 2008.</p>	<p>the overall scale of growth has not been remitted by the judge and therefore is not a matter for consideration through this consultation, additional evidence has been provided to support the scale proposed. Lack of delivery in recent years is a reflection of current economic circumstances rather than of housing demand or long term need. The JCS is a long term strategic plan covering the period from 2008 to 2026 and must therefore take a long term, evidence based approach.</p>
<p>Detailed Officer Response:</p> <p>The level of housing provision was not remitted by Mr Justice Ouseley. It remains part of the adopted Joint Core Strategy and is not included in the proposed submission text. A future review would be expected to take at least 2 to 3 years and in the interim the adopted JCS provision will remain in force. To retain a 15 year time horizon a review would need an end date extending to at least 2030 adding a</p>						

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<p>further 4 or 5 years need to total plan provision.</p> <p>As part of the SA/SEA process, the evidence for the level of housing requirement has been reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document "Topic Paper Homes and Housing August 2012" supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains valid.</p> <p>No alternative analysis, supported with evidence, has been submitted to demonstrate that a lower level of housing provision is justified.</p> <p>Lack of delivery in recent years is a reflection of current economic circumstances rather than of housing demand or long term need.</p>						
12377	Environment Agency	G	Comment		No comment	Noted.
12378	Rosemary O'Donoghue	I	O		Object to scale of growth on transport grounds. Bus lanes cannot be delivered due to narrowness of roads.	Objection noted. Strategy provides for necessary infrastructure to support new housing, including transport infrastructure.
Detailed Officer Response:						
<p>The strategy is consistent with NATS which provides for the necessary road infrastructure and public transport improvements to support the existing community and new housing.</p>						
12379	Lawson Planning Partnership Ltd on behalf of Horsham	D	C		Delivery of JCS is dependant on identification of further employment land and change in approach to releasing land for employment uses.	Comments noted. Strategy provides for necessary employment growth to support planned new housing.

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	Properties					
12380	Mr DEJ Sayer	I	NA		Raises concerns relating to specific sites outside the scope of this consultation.	BDC will consider comments as appropriate in relation to sites specific work.
12381	Suffolk County Council	N	C		No comment.	Noted.
12382	Colney Parish Meeting	PC	O		Dispute overall scale of growth and the evidence base and forecasts behind it. Councils should have power to prevent speculative applications. Object to NDR.	Objection noted. Scale of growth and its evidence base has already been established in the adopted JCS. Powers of Local Planning Authorities are beyond the scope of this consultation. Strategy enables limited growth north east of Norwich prior to delivery of NDR. Funding has been committed to NDR.

Detailed Officer Response:

The level of housing provision was not remitted by Ouseley LJ. It remains part of the adopted Joint Core Strategy and is not included in the proposed submission text. A future review would be expected to take at least 2 to 3 years and in the interim the adopted JCS provision will remain in force. To retain a 15 year time horizon a review would need an end date extending to at least 2030 adding a further 4 or 5

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<p>years need to total plan provision.</p> <p>As part of the SA/SEA process, the evidence for the level of housing requirement has been reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document "Topic Paper Homes and Housing August 2012" supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains valid.</p> <p>No alternative analysis, supported by evidence, has been submitted to demonstrate that a lower level of housing provision is justified.</p> <p>Changing the powers of Local Planning Authorities is beyond the scope of this consultation.</p> <p>The NDR is a major scheme promoted by Norfolk County Council and is an important consideration in the determination of the growth strategy promoted. When the JCS was examined in November 2010 the relationship between growth and the NDR was fully debated. Whilst the NEGOT was remitted the NDR was not. Since the JCS examination in November 2010, the NDR has been given programme entry status and government have awarded funding of £89m to the scheme. There are still statutory processes to be gone through including planning permission, however the funding situation is far more certain and since the adoption of the JCS the certainty of delivery of the NDR has significantly increased.</p>						
12383	James Watts	I	O	See detailed response below.	Soundness objection, particularly relating to lack of proportionate evidence in SEA covering: loss of high grade agricultural land, long term water resources, surface water flood risk, biodiversity, green infrastructure and the economy. Suggestions on further work necessary to address this shortfall in	See detailed response below.

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					evidence provided.	
Detailed Officer Response:						
Water – Abstraction Pressures						
<p>The pressure for additional water resources results from significant additional housing across the whole of the Greater Norwich Area. In particular additional resources are needed within the Water Resource Zone 8 (WRZ8): Norwich and the Broads. The Sustainability Appraisal prepared for the full Joint Core Strategy, rather than the remitted element, dealt in detail with the impact upon water resources, and this was supported by a bespoke Water Cycle Study that was commissioned specifically to identify whether water resources, with or without intervention, were able to accommodate the level of growth provided. Specific policy mitigation was put in place through Policy 3: Energy and Water of the JCS, which remains adopted.</p> <p>The Sustainability Appraisal prepared as a consequence of the High Court Order remitting part of the Joint Core Strategy considered only the distribution of development, the overall level of development was not remitted.</p> <p>Article 5(2) of the SEA Directive (need reference for translation in to UK law), states that “<i>The environmental report prepared ... taking into account ... the content and level of detail in the plan or programme, its stage in the decision making process and the extent to which matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment</i>”.</p> <p>Because the impact upon water abstraction related to the overall scale of growth, that the scale of growth had not changed and that the original JCS SA had considered the impact of the overall quantum of growth on water resources it was not necessary to duplicate such an assessment in the Sustainability Appraisal which supported the work which followed the High Court Order.</p> <p>Notwithstanding the above, water supply and quality have been covered by adopted policies 1 and 3 of the JCS. Policy 1 requires all development to minimise water use, to protect groundwater resources and to have no impact on European designated sites and species through surface water run off, water abstraction or sewerage discharge. Policy 3 sets some of the most demanding water efficiency standards nationally for new development to minimise its impact on water quantity and quality.</p>						

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<p>This approach results from a rigorous evidence base and is supported by Anglian Water, Natural England and the Environment Agency. These organisations have signed a memorandum of understanding on this issue and continue to work together and with the GNDP to ensure that water quality and supply are taken account of through Anglian Water's forward planning of water supply. A recent update on the 2010 Habitats Regulation Assessment has confirmed that the plan is unlikely to have negative effects on the water quality in the river Wensum. Natural England has confirmed that it is satisfied with this conclusion.</p> <p>Surface Water Flooding Risk</p> <p>As with water abstraction, the issue of surface water flooding as a general concern was dealt with through the original JCS submission, and its supporting Sustainability Appraisal. Surface Water Flooding issues are covered in adopted JCS policy 1, which requires development to be located and designed to minimise and mitigate flood risk. In addition, the non-remitted part of policy 10 requires major development to include Sustainable Urban Drainage Systems.</p> <p>New national legislation will require new development to have drainage permission as well as planning permission. This will ensure sustainable drainage is implemented on all sites. Other Local Plan documents, using evidence for the Norwich urban area from the recent surface water study, will provide more detailed policies if necessary in each district to ensure development addresses surface water flooding issues.</p> <p>Clearly, in advance of specific site being identified it is not possible to identify specific mitigations. Therefore further policy requirements related to specific sites are, in accordance with Article 5(2) more appropriately assessed within Site Specific planning documents, in the case of the proposed NEGTA an Area Action Plan. Indeed, the details of such mitigations might be best designed by developers as part of the production of individual masterplans, with policy development concerning itself only with questions of principle.</p> <p>Biodiversity and Green Infrastructure</p> <p>The appraisal of the draft plan, under objective 4 on pages 84 and 85, covers this issue. It identifies the specific policy measures which are put in place in terms of the delivery of GI priorities within the draft plan.</p>						

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<p>General policy mitigations are set out within Policy 1 of the adopted JCS and were evaluated through the Sustainability Appraisal which supported its submission. The Sustainability Appraisal produced to support the draft plan does not reconsider these issues as the issues had already been dealt with in the adopted JCS and its SA.</p> <p>Further site specific mitigations will be considered as part of the Area Action Plan, which will consider site specific issues within the Growth Triangle.</p> <p>In this way the Sustainability Appraisal is consistent with Article 5(2) of the SEA Directive in regards the appropriate level at which particular matters should be considered.</p> <p>Economic Impact</p> <p>A range of economic evidence supports the JCS. The evidence takes account of recessionary impacts and makes a number of assumptions about growth. Even low growth scenarios forecast significant job growth and housing demand over the plan period to 2026. A realistic and reasonable baseline for the SEA must therefore assume significant levels of growth. The policy response to the evidence through the JCS needs to play its part in facilitating economic recovery. The implication of a longer and more severe economic downturn than forecast would be reflected in a timely review of the JCS.</p> <p>Appraisal of Impact on Agricultural Land</p> <p>In accordance with Article 5(1), the Sustainability Appraisal only needs to consider Reasonable Alternatives. The reasonable alternatives identified are those set out in 4.12 of the Sustainability Appraisal Report. The identification of these reasonable alternatives included an evaluation of any additional capacity which was available in Norwich, beyond the sites for approximately 8,600 additional dwellings already planned. There are very limited opportunities to use brownfield land in the area outside Norwich. See Appendix E of the SA technical appendix for the analysis of additional capacity which demonstrates there are no additional opportunities for housing development on brownfield land.</p> <p>Under objective ENV9 of the appraisal of reasonable alternatives, found on page 69 of the Sustainability Appraisal report, consideration is</p>						

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<p>given to the impact upon agricultural land, including that within Grades I & II. For all reasonable alternatives a significant negative effect on the baseline is predicted as a consequence of the use of agricultural land. Exact figures are not quoted for the quantities of different grades of agricultural land which is lost. Such figures could only be defined through making decisions about the specific sites which would accommodate development, which cannot be defined at a strategic level.</p>						
<p>Future Abstraction</p>						
<p>See answer above.</p>						
<p>Surface Water Management Plan</p>						
<p>It is considered that an appropriate level of detail is provided about the draft SWMP in accordance with the relevance of its findings to the definition and evaluation of reasonable alternatives.</p>						
<p>Further detail should be included about the Economic Growth Study and EofE Forecasting Model</p>						
<p>A range of economic evidence supports the JCS. The evidence takes account of recessionary impacts and makes a number of assumptions about growth. Even low growth scenarios forecast significant job growth and housing demand over the plan period to 2026. The JCS can not directly address skills but does provide the planning context to attract and retain skilled labour and “knowledge economy” businesses. The GNDP is helping address the skills gap through a number of other activities outside the statutory planning process. The policy response to the evidence through the adopted and submission parts of the JCS needs to play its part in facilitating economic recovery. A realistic and reasonable baseline for the SEA must therefore assume significant levels of growth. The implication of a longer and more severe economic downturn than forecast would be reflected in a timely review of the JCS</p>						
<p><u>Comments from URS</u></p>						
<p>An evidence-based review of sustainability issues is presented in Chapter 3 (‘What’s the Scope of the SA?’), and informed the SA. URS undertook this review drawing on extensive experience gained through our work as sustainability consultants supporting Local Plan-</p>						

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making in England. We would not be so bold as to suggest that we hold a monopoly on the definition of sustainability issues as they relate to the JCS, but do contend that our approach to identifying sustainability issues to inform the SA was proportionate, and hence the range of issues presented was appropriate to the to the best of our knowledge.						
12384	David Smith	I	O		Soundness objection on entire JCS, including it failing to comply with the High Court judgement. Concerns include lack of full consultation and issues relating to environmental damage, loss of farmland, tourism, pollution, traffic, crime, capacity of health infrastructure and quality of life.	Objection noted. The strategy provides for necessary infrastructure and requires measures to minimise the negative effects relating to issues of concern.
<p>Detailed Officer Response:</p> <p>The level of housing provision was not remitted by Mr. Justice Ouseley. It remains part of the adopted Joint Core Strategy and is not included in the proposed submission text.</p> <p>As part of the SA/SEA process, the evidence for the level of housing requirement has been reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document “Topic Paper Homes and Housing August 2012” supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains valid.</p> <p>No alternative analysis has been submitted to demonstrate that a lower level of housing provision is justified.</p> <p>The strategy provides for necessary infrastructure. Concentrated growth in the north east provides the best opportunity to support and deliver new infrastructure. Infrastructure needs are set out in Appendix 7 of the adopted JCS and expanded and kept up to date in the</p>						

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Local Infrastructure Plan and Programme.						
12385	Ivan Smith	I	O		Soundness objection on entire JCS, including it failing to properly consider alternatives or take account of need to cut CO2 emissions. Concerns include lack of full consultation, failure to reduce growth targets as a result of recession and issues relating to environmental damage, loss of farmland, tourism, pollution, traffic, crime, capacity of health infrastructure and quality of life.	Objection noted. The strategy provides for necessary infrastructure and requires measures to minimise the negative effects relating to issues of concern, including CO2 emissions.
<p>Detailed Officer Response:</p> <p>The level of housing provision was not remitted by Mr. Justice Ouseley. It remains part of the adopted Joint Core Strategy and is not included in the proposed submission text.</p> <p>As part of the SA/SEA process, the evidence for the level of housing requirement has been reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document "Topic Paper Homes and Housing August 2012" supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains valid.</p> <p>No alternative analysis has been submitted to demonstrate that a lower level of housing provision is justified.</p> <p>The strategy provides for necessary infrastructure. Concentrated growth in the north east provides the best opportunity to support and deliver new infrastructure. Infrastructure needs are set out in Appendix 7 of the adopted JCS and expanded and kept up to date in the</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
Local Infrastructure Plan and Programme.						
12386 - 12399	Savills on behalf of Persimmon, Hopkins and Taylor Wimpey	D	S/O	If higher than national build standards to be applied, needs to be tested and cumulative impact assessed as para 174 NPPF.	Support location of growth. Do not allow delivery of NDR to be barrier where other methods of travel available. Do not require higher than national building standards in this document.	Support noted. Strategy enables limited growth north east of Norwich prior to delivery of NDR. Details of building standards aspired to in NE growth triangle will be outlined in AAP.
Detailed Officer Response						
<p>The delivery of the strategy as a whole is predicated on the delivery of NATS, an essential part of which is the NDR which provides the additional road capacity which allows for the delivery of public transport prioritisation and enhancements to other modes of travel. Therefore, it is a precursor to ensuring that locations can make maximum use of public transport, walking and cycling.</p> <p>The expectation that development within the Growth Triangle will reflect similar high standards to the Eco-Town is set out in supporting text rather than in policy. The specific minimum expectations for development are set out in other, principally adopted, policies of the JCS. This is considered to be a clear statement of intent by the GNDP authorities that major development in the NE should aspire to high standards but is not unduly prescriptive. This maintains flexibility for negotiation to reflect economic circumstances whilst future proofing the plan against setting standards which become outdated. None of this prevents appropriate standards being established through the AAP.</p>						
12400	Chris Dady	I	O	Do not agree that area can or should support massive levels of inward migration Objection on a wide range	Do not agree that area can or should support massive levels of inward migration Objection on a wide range of	Confident that each issue raised is addressed in strategy and that the methodology used for

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
				of planning and local democracy issues and over SEA methodology. Provides alternative growth locations. JCS should be withdrawn.	planning and local democracy issues and over SEA methodology. Provides alternative growth locations. JCS should be withdrawn.	SEA is sound, covering appropriate growth locations. No need to withdraw JCS.

Detailed Officer Response:

Do not agree that area can or should support massive levels of inward migration

The level of housing provision was not remitted by Mr. Justice Ouseley. It remains part of the adopted Joint Core Strategy and is not included in the proposed submission text.

As part of the SA/SEA process, the evidence for the level of housing requirement has been reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document "Topic Paper Homes and Housing August 2012" supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains valid.

No alternative analysis has been submitted to demonstrate that a lower level of housing provision is justified.

Within the context of the remitted text, the SA has considered all reasonable alternatives. With regards to the additional options put forward by the respondent:

Relocation of Norwich International Airport

There are no clear, substantive plans that the authorities are aware of for the relocation of Norwich International Airport. Indeed, the indications are that Norwich Airport has no plans at all to relocate; for instance, on 26th July 2012, plans for a new 80,000 m² Aviation Business Park development at the airport were announced publicly. In the absence of clear and deliverable proposals for relocation, it is not considered that such an alternative could be considered reasonable.

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p data-bbox="185 331 331 363">Acle Hub</p> <p data-bbox="185 405 1160 437">See comments in relation to NAA submission, representation 12418.</p> <p data-bbox="185 478 336 510">Dispersal</p> <p data-bbox="185 552 2136 769">The potential for dispersal of the housing numbers was fully considered as part of the process of identifying Reasonable Alternatives. This consideration supported the conclusions that there was no scope for further dispersal to South Norfolk or Norwich, and that the appropriate level of dispersal within the Broadland part of the Norwich Policy Area was 2,000. This dispersed 2,000 within the Broadland part of the NPA forms part of the draft plan. All other development would need to be dealt with through strategic scale development within the Norwich Policy Area. The detail behind these conclusions is set out in 4.5 & 4.6 of the SA Report and Appendices E, F, G & H of the Technical Annex of the SA Report.</p> <p data-bbox="185 810 607 842">Future Homes Commission</p> <p data-bbox="185 884 2148 1031">The Future Homes Commission was set up by the Royal Institute of British Architects (RIBA) to conduct an independent inquiry into the quality of newly built housing. The commissions report includes discussion about how Britain can meets its housing needs, how funding for housing development could be secured, the design of new homes, how homes can be more responsive to consumer demand and the role of Local Government in achieving sustainable communities.</p> <p data-bbox="185 1072 2125 1142">The respondent's indicates that the conclusions of this commission are that 300,000 homes can be built annually on brownfield land near every city, town and village.</p> <p data-bbox="185 1184 2141 1326">This is not what the report finds. It is true that the report states that Britain needs to build between 300,000 and 330,000 new homes every year and that there is already a back log of 2 million homes resulting from past under investment. Also, that in order to meet these levels land will be needed in or close to virtually every city, town and village. It is also worth noting that the figure of 300,000 to 330,000 homes is a substantial increase above previous Government aspirations to deliver the 230,000 homes needed by newly forming households every</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>year, as articulated through the Regional Spatial Strategies, and is in fact a three-fold increase in the number of homes currently being built every year. The statements in the report are clearly in support of the conclusion that there is a pressing need to build more homes. Enabling and managing the delivery of new homes is of course one of the central functions of the Joint Core Strategy, including the proposed submission content.</p> <p>It is also noteworthy that the report also states that this cannot be achieved without councils and other public authorities energetically supporting new development and local communities accepting the need for new building.</p> <p>In the section entitled “supplying the land” the report does not state that 300,000 homes can be built annually on brownfield land. What it does state is that there are enough brownfield sites nationally to accommodate an additional 1.5 million more homes, citing a 2011 CPRE publication in support of this statement. However, the report makes no analysis of how quickly these sites could come forwards, or whether the rate at which urban land recycling might occur in order to maintain an ongoing supply of PDL development sites over a sustained period at the very high rate of 300,000 to 330,000 homes per year.</p> <p>Of course, none of this changes the requirement, as set out in the National Planning Policy Framework for the GNDP authorities to ensure the JCS meets the full, objectively assessed needs for market and affordable housing in the housing market area. Therefore, the essential question in the context of the JCS is not whether there are available PDL sites elsewhere, the development of which might contribute to the national need for housing, but rather how can the JCS best make use of locally available PDL in meeting the objectively assessed need for market and affordable homes, and other land uses such as employment uses. The JCS as a whole seeks to do exactly this by ensuring that the best use of available brownfield site in and around Norwich is achieved. In the context of the proposed submission content, the capacity of Norwich to accommodate further, redistributed, growth was considered as part of the process of defining Reasonable Alternatives. The conclusion of this assessment was that there was no meaningful scope for significant redistribution of additional housing to Norwich. This detail of this assessment can be found in appendix E of the Technical Annex to the Main Sustainability Appraisal Report.</p> <p>Development of agricultural land</p> <p>In order to meet housing need, development of agricultural land is necessary. The strategy largely avoids development of high grade</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>agricultural land. Avoiding development of agricultural land in this area is unsustainable because it would not meet social and economic needs or would involve building on greenfield land not in agricultural use which would compromise environmental considerations.</p> <p>Lack of implementable plans for infrastructure provision</p> <p>The strategy provides for necessary infrastructure. Concentrated growth in the north east provides the best opportunity to support and deliver new infrastructure. Infrastructure needs are set out in Appendix 7 of the adopted JCS and expanded and kept up to date in the Local Infrastructure Plan and Programme.</p> <p>Approach to consultation insufficient</p> <p>The consultation has been undertaken in line with the relevant regulations.</p> <p>Need to withdraw JCS and replace with local plans for each district supported by re-evaluation of housing numbers</p> <p>The local authorities are required to meet the objectively assessed needs of the area (see response on housing numbers).</p> <p>The authorities maintain that the joint approach set out in the JCS is the most appropriate means of dealing with development pressures locally to 2026 and do not intend to withdraw the JCS.</p> <p>Specific Issues</p> <p>There is no evidence that all options that were reviewed have been subject to full strategic environmental assessment. The original process examined 11 potential growth locations at three different scales of strategic growth and 7 potential combinations of those locations. However, the detail does not include an equitable assessment for every single option and only the three options put before the public in this consultation have had the benefit of these full assessments.</p> <p>Article 5(1) of the Directive requires an environmental report to be prepared considering reasonable alternatives. The High Court</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>judgement is consistent with this. The initial evaluation of locations undertaken within the Sustainability Appraisal was undertaken with the express intention of identifying Reasonable Alternatives for the distribution of the development within the policies which were remitted by the High Court Order. There was no need to fully appraisal those alternatives which were unreasonable, as stated in the Directive.</p> <p>Water resources</p> <p>Water supply and quality have been covered by adopted policies 1 and 3 of the JCS. Policy 1 requires all development to minimise water use, to protect groundwater resources and to have no impact on European designated sites and species through surface water run off, water abstraction or sewerage discharge. Policy 3 sets some of the most demanding water efficiency standards nationally for new development to minimise its impact on water quantity and quality.</p> <p>This approach results from a rigorous evidence base and is supported by Anglian Water, Natural England and the Environment Agency. These organisations have signed a memorandum of understanding on this issue and continue to work together and with the GNDP to ensure that water quality and supply are taken account of through Anglian Water’s forward planning of water supply. A recent update on the 2010 Habitats Regulation Assessment has confirmed that the plan is unlikely to have negative effects on the water quality in the river Wensum. Natural England has confirmed that it is satisfied with this conclusion.</p> <p>Support CPRE</p> <p>See response to CPRE, representation 12376</p> <p>Natural Environment</p> <p>Landscape character was considered in the identification of sectors appropriate for development through objective 8 of SA framework. Broadland’s landscape character assessment was undertaken to identify particular landscape sensitivities. Whilst these sensitivities are not considered to preclude development, they will help to shape the form of new development.</p> <p>Public Transport and Climate Change issues</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>Growth across Norwich is dependent on the implementation of the NATS strategy to manage travel demand. This will provide the infrastructure to enable the introduction of further measures to support public transport, walking and cycling.</p> <p>Code for Sustainable Homes</p> <p>The draft plan only considers the distribution and form of development. Improvements to energy efficiency ahead of national requirements based on High Code for Sustainable Homes levels for energy promoted in the submission version of the JCS were not accepted by the Inspectors.</p> <p>Local Democracy</p> <p>Decisions to publish, submit and adopt the JCS will be considered by locally elected councillors.</p> <p>Health and Social Care</p> <p>The strategy provides for necessary infrastructure. Concentrated growth in the north east provides the best opportunity to support and deliver new infrastructure. Infrastructure needs are set out in Appendix 7 of the adopted JCS and expanded and kept up to date in the Local Infrastructure Plan and Programme.</p> <p>Employment</p> <p>The JCS plans for 27,000 new jobs across the three districts rather than the NE growth triangle as indicated in the representation. The growth triangle is well related to significant job opportunities in the city centre and at Broadland Business Park and the Airport. Local employment opportunities are provided at Rackheath Industrial area and on the Salhouse Road.</p> <p>Development reliant on NDR</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>The adopted strategy contains a contingency strategy for dealing with delay to, or non-delivery of, the NDR. Growth across Norwich is dependent on the implementation of the NATS strategy to manage travel demand. A key element of NATS is the NDR which will prevent unnecessary through trips and provide the capacity for the introduction of measures to support buses, walking and cycling. Without the introduction of the NDR and NATS the local impact of large scale growth in the north east would be unacceptable. Even with NATS and the NDR in place, an additional transport link connecting Broadland Business Park to Norwich International Airport via new growth areas will be required to provide local access and afford the opportunity to deliver fast and direct public transport and cycling facilities. This link in itself does not replace the need for the NDR.</p> <p>Railways</p> <p>Delivery of the strategy is not dependent on investment in rail infrastructure. However the existence of the railway line affords additional travel choice opportunities.</p> <p>BRT</p> <p>BRT is at the heart of the NATS strategy. It is not simply about providing “bus lanes”, but is a whole package of measures including off bus ticketing, improved waiting facilities and high specification vehicles. The implementation of the NDR will help to enable improvements within the city centre to bus priority.</p> <p>Neighbourhood and Community Planning</p> <p>The local authorities are supportive of parishes which wish to produce Neighbourhood Plans. The existing attributes of the area which have been identified remain important and balancing these concerns against the need for new development will be an important part of the future planning process.</p> <p>Approved planning applications were accounted for in establishing the future requirement for housing allocations. This is shown in policy 4 of the adopted JCS. The overall housing figures were not remitted by the High Court judgement.</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>Salhouse Conservation Area</p> <p>Any extension to the Salhouse Conservation Area will be taken into account when considering the form new development takes.</p> <p>Salhouse's inclusion in the Norwich Policy Area</p> <p>The proposed policies and definitions in the Reg 25 Technical and Public consultations included Salhouse in the NPA. There were therefore two opportunities to influence this proposal, in late Summer 2008 and Spring 2009, in addition to the opportunity to raise a soundness objection when the JCS was subject to pre-submission publication in November/December 2009.</p> <p>The Broads</p> <p>The JCS sets a requirement for a buffer zone to the NE of Rackheath to protect the Broads from any direct impact resulting from development. Wider considerations resulting from visitor pressure relating to the overall scale of growth will be addressed through the delivery of a green infrastructure network as provided for through policy.</p>						
12401	Great & Little Plumstead PC	PC	O	<p>Distribution proposed is flawed and the evidence on which it is based is unsound.</p> <p>Dispersal would be a more appropriate response.</p> <p>JCS should be withdrawn.</p>	NE triangle is not a sustainable location for such levels of growth: high grade farmland, broads landscape, employment in Norwich	Confident that each issue raised is addressed in strategy and that the methodology used for SEA is sound, covering appropriate growth locations. No need to withdraw JCS.
<p>Detailed Officer Response:</p> <p>In accordance with Article 5(1) of the SEA directive, the identification of reasonable alternatives is limited to the geographical extent of the plan. In this instance, that geographical area was the Norwich Policy Area. An evaluation of the capacity of different sectors of the NPA to</p>						

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<p>accommodate additional development included various villages and a small number of market towns. Market towns and villages outside of the NPA were, as a consequence of the geographical scope of the plan, not appropriate to form part of Reasonable Alternatives. Similarly, coastal areas lie not only outside the geographical scope of the plan, but also outside the jurisdiction of the local planning authorities, and therefore could not be considered to be reasonable.</p> <p>The identification of these reasonable alternatives included an evaluation of any additional capacity which was available in Norwich, beyond the sites for approximately 8,600 additional dwellings already planned. This concluded that no additional capacity could reasonably be considered to exist in Norwich. There are very limited opportunities to use brownfield land in the area outside Norwich.</p> <p>Under objective ENV9 of the appraisal of reasonable alternatives, found on page 69 of the Sustainability Appraisal report, consideration is given to the impact upon agricultural land, including that within Grades I & II.</p> <p>The reasonable alternatives identified are those set out in 4.12 of the Sustainability Appraisal Report. See Appendix E of the SA technical appendix for the analysis of additional capacity which demonstrates there are no additional opportunities for housing development on brownfield land.</p>						
12402-3	The Green Party	P	O	Non-compliance with Climate Change Act	Climate change implications, no accounting for emissions, dependency on NDR, risks to Broads, reduce housing numbers, include windfall allowance	First Spatial Planning Objective and Policy 1 addresses climate change. Strategy enables limited growth north east of Norwich prior to delivery of NDR and requires measures to minimise the negative effects relating to issues of concern, including CO2

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
						emissions. Guidance has been followed regarding treatment of windfall.
<p>Detailed Officer Response:</p> <p>Endorse CPRE view on Housing Numbers</p> <p>See CPRE Response, representation 12376.</p> <p>Major concern in relation to alternative 1 is that it focuses growth of 7,000 to 10,000 dwellings around the NDR. The NDR makes a mockery of the Climate Change Act. Need for a “proper” carbon assessment, compliant with National legislation (Climate Change Act). The proposed submission is not compliant with the Climate Change Act.</p> <p>The NDR forms part of NATS and as such lies outside the direct scope of the JCS as a whole including the proposed submission content, therefore a full assessment of the NDR in sustainability terms is not appropriate. Notwithstanding the above, growth across Norwich is dependent on the implementation of the NATS strategy, which is intended to manage travel demand. This provides the infrastructure to enable the introduction of further measures to support public transport, walking and cycling.</p> <p>Consideration has been given to the impact of the reasonable alternatives in terms of reducing the impact of traffic on the environment and adapting to and mitigating against the impacts of climate change. Whilst not comprising a “full carbon assessment” the level of detail included was considered sufficiently detailed to enable effective comparison given the content and level of detail of the plan.</p> <p><u>Carbon Assessment Comments from URS</u></p> <p>The preferred and alternative approaches that were the subject of appraisal are ‘strategic’ in nature. Specifically, they are not defined in terms of precise locations for development or descriptions of development that would come forward. Without this knowledge, a detailed carbon assessment would need to rely heavily on assumptions.</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>Despite the strategic nature of the plan approaches under consideration, the SA was still able to draw conclusions regarding greenhouse gas emissions. This discussion is set out under <i>ENV9: To adapt to and mitigate against the impacts of climate change</i>. The appraisal focused on: A) likely significantly effects on car dependency; and B) likely significant effects on the potential to design-in community level low carbon energy. In terms of (A), it was not possible to identify significant effects on the baseline, but it was possible to conclude that Alternative 3 is less than ideal. In terms of (B) it was concluded that all approaches would result in significant positive effects (it was not possible to identify relative merits).</p>						
<p>Alternative 1 is not publically acceptable</p>						
<p>Decisions to publish, submit and adopt the JCS will be made by locally elected councillors. Representations that have been made by the public and other stakeholders have been taken into account in development of the strategy and will be made available to councillors to help inform these decisions. In this way the views of the public have and will be taken account of.</p>						
<p>The proposed strategy poses a risk to the Broads</p>						
<p>The JCS sets a requirement for a buffer zone to the NE of Rackheath to protect the Broads from any direct impact resulting from development. Wider considerations resulting from visitor pressure relating to the overall scale of growth will be addressed through the delivery of a green infrastructure network as provided for through policy. The Broads Authority supports the pre-submission plan.</p>						
<p>Does not benefit areas of high deprivation</p>						
<p>In regards to deprivation, the proposed submission content cannot be considered outside the context of the plan as a whole. The strategy as a whole includes policies to support the regeneration of the city centre and suburban areas, which will benefit deprived communities. In regards to proposed submission content, the strategy proposed will support high quality public transport serving an area of deprivation (Heartsease) which is unlikely to be achieved without significant development to the north-east of Norwich. Deprived areas elsewhere are supported by other parts of the strategy.</p>						

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<p>Alternative solution proposed: a limited review of the 9,000 housing figure remitted by the High Court. Of this figure, 2,000 dwellings are allocated to Broadland rural area – we don't have a problem with this. Of the 7,000 dwellings (rising to 10,000 post 2026), we advocate deferral of 2,000 until the next plan period post 2026 (i.e. not to allocate 2,000 dwellings rising to 5,000 post 2026 at Rackheath). Alternatively, finding sites for 2,000 dwellings in the current plan period should be left to windfall permissions in the three districts.</p> <p>The court order required that a new Sustainability Appraisal be produced for those parts of the JCS which were remitted, taking into account in particular the strategic growth in the North-East Growth Triangle and the reasonable alternatives (if any) to this.</p> <p>The court order did not remit the minimum figures identified for the NPA or GNDP area as a whole, despite the claimants' request to do so. Therefore, these housing figures were not, as a matter of course substance for the Sustainability Appraisal required. Clearly, this does not prevent the Authorities determining to “start again” and re-look at all issues. However, it is not considered that the evidence indicates that housing need or demand has altered substantially since the housing targets of the JCS were tested at examination despite the recent history of disappointing housing delivery, and in any case the RSS currently remains in force. It would therefore be inappropriate to pursue a full review and increase uncertainty without good reason to do so.</p> <p>On this basis a strategy which seeks to deliver only part of the minimum number of homes required cannot be considered to satisfy the objectives of the plan, and as such cannot be considered a Reasonable Alternative at all.</p> <p>The NPPF requires that a Local Planning Authorities Local Plan to meet the full, objectively assessed needs for market and affordable housing. The updated Topic Paper: Homes and Housing (2012) sets out a full range of evidence explaining how the need for market and affordable housing was met. This Topic Paper also explains how the plan intends to utilise Windfall development, specifically that it will provide flexibility of supply allowing some mitigation for under delivery on allocations, and in meeting additional demand above the housing allocations requirements should those targets prove to be an underestimate of need, as indicated by some of the evidence sources cited in the Topic Paper: Homes & Housing (2012). Therefore, in this instance it is not considered that relying on windfall housing to meet a substantial part of the housing allocations targets would be consistent with the NPPF.</p>						

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12404	Mollie Howes	I	O		Do not feel evidence base is robust in relation to traffic, water and the economy. Concern for loss of agricultural land; local opinion ignored. Inspector suggested JCS should not be proceeded with. The spirit of the judge's decision has not been complied with.	Objection noted. Strategy based on full and robust evidence base, already established in adopted JCS, and requires measures to minimise impact on agriculture.

Detailed Officer Response:

The strategy is based on full and robust evidence base, already established in the adopted JCS and updated where necessary.

Traffic

Growth across Norwich is dependent on the implementation of the NATS strategy to manage travel demand. This provides the infrastructure to enable the introduction of further measures to support public transport, walking and cycling.

Water

Water supply and quality have been covered by adopted policies 1 and 3 of the JCS. Policy 1 requires all development to minimise water use, to protect groundwater resources and to have no impact on European designated sites and species through surface water run off, water abstraction or sewerage discharge. Policy 3 sets some of the most demanding water efficiency standards nationally for new development to minimise its impact on water quantity and quality.

This approach results from a rigorous evidence base and is supported by Anglian Water, Natural England and the Environment Agency. These organisations have signed a memorandum of understanding on this issue and continue to work together and with the GNDP to ensure that water quality and supply are taken account of through Anglian Water's forward planning of water supply. A recent update on

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<p>the 2010 Habitats Regulation Assessment has confirmed that the plan is unlikely to have negative effects on the water quality in the river Wensum. Natural England has confirmed that it is satisfied with this conclusion.</p> <p>Economy</p> <p>In order to meet housing need, development of agricultural land is necessary. The strategy largely avoids development of high grade agricultural land. Avoiding development of agricultural land in this area is unsustainable because it would not meet social and economic needs or would involve building on greenfield land not in agricultural use which would compromise environmental considerations. Views expressed in response to consultations have been taken into account and reported to locally elected councillors to help them make decisions on the JCS through the plan making process.</p> <p>Soundness</p> <p>The Inspectors found the JCS to be sound. The preparation of further SA work and this process of pre submission publication complies with both the spirit and letter of the court order.</p>						
12405	Natural England	G	C	The HRA (addendum) and the plan should be updated with the details within the e-mail from Norfolk County Council's Biodiversity and Countryside Manager dated 31/07/12.	<p>No additional comment.</p> <p>Satisfied that the HRA addendum enables the conclusion to be reached that significant effect on River Wensum SAC is unlikely.</p> <p>Satisfied with the confirmation provided in regards to implementation/delivery of the</p>	<p>Natural England's support for the conclusion of the HRA that the plan is unlikely to have a significant effect on River Wensum SAC is welcomed.</p> <p>It is noted that Natural England are of the</p>

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
					<p>agreed GI mitigation measures.</p> <p>Requests that the HRA (addendum) and the Plan should be updated to reflect progress on the implementation/delivery of the GI mitigation measures as detailed within the e-mail from Norfolk County Council's Biodiversity and Countryside Manager dated 31/07/12.</p>	<p>opinion that sufficient confirmation has been provided about the delivery/implementation of agreed GI mitigation measures.</p>

Natural England is a co-signatory of the supplementary note to the HRA produced in July 2012. This supplementary note confirmed that Anglian Water, Environment Agency and Natural England agreed that as no material changes were proposed to the JCS the Habitat Regulations Assessment dated February 2010 remained unchanged. This was subject to the progress made, through an addendum to the HRA, in working towards a long term resolution to the water resource requirement.

Natural England's further confirmation of their support for the conclusion of the HRA that the plan is unlikely to have a significant effect on River Wensum SAC is welcomed. It is also noted that, following further correspondence with Norfolk County Council's Biodiversity and Countryside Manager, that Natural England consider that sufficient confirmation has been provided about the delivery/implementation of agreed GI mitigation measures. The latter is in connection with uncertainties identified within the HRA in regards to possible recreational impact upon European Sites.

Natural England's request that the further detail on delivery/implementation included within the correspondence between Norfolk County Council's Biodiversity and Countryside Manager and Natural England be included in the HRA and Plan is noted. However, it is not considered necessary to change the draft plan or HRA addendum. The additional information supplied is an illustration of the ongoing

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<p>implementation of the plan through the process explained within the implementation section of the adopted JCS. In addition, the general policies relating to the delivery of Green Infrastructure within the JCS remain adopted and are not within the scope of this consultation. It is considered that these policies, when considered in conjunction with the implementation framework and the additional information to be provided as an addendum to the HRA provide sufficient certainty in regards to the delivery/implementation of the agree GI mitigation measures.</p> <p>It should be noted that specific policies mitigation is proposed by the draft plan in connection with the potential direct impacts identified by the HRA in relation to significant development north of Rackheath.</p> <p>Notwithstanding the above, the GNDP authorities would be happy to draft a memorandum of understanding between them and Natural England to confirm the actions which are being undertaken in order to address the requirements for the delivery of the GI mitigation measures.</p>						
12406	Rackheath Parish Council	PC	O		Evidence in Sustainability Appraisal does not support Alternative 1 as most appropriate. Inadequate infrastructure makes this location unsustainable.	Objection noted. Confident that strategy and methodology used is sound. Strategy provides for growth in a number of strategic locations, including north east of Norwich to ensure delivery of housing and provide for appropriate infrastructure.
<p>Detailed Officer Response:</p> <p>For the reasons set out in the assessment of Reasonable Alternatives, section 6.2 & 6.3 of the Sustainability Appraisal report, Alternative</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>1 is considered to be the appropriate strategy. It is not considered that the statement made about the merits of Alternative 2 equate to evidence that this judgement should be reconsidered.</p> <p>The results of the poll undertaken by Rackheath Parish Council are noted. However, it is a long established planning principle that unless public objections are focused on material planning considerations, they are of limited 'weight' in the decision-making process. In this instance, the merits of Alternative 1 are such that it is considered to be in the wider public interest to pursue this strategy.</p> <p>After assessing a wide range of options for growth, the SA identified three reasonable alternatives. The evidence in the SA supports the choice of Alternative 1 as the most appropriate strategy for development.</p>						
12407	Rev. Michael Sears	I	S	Support strategy to promote economic growth and equality and provide housing	Support strategy to promote economic growth and equality and provide housing	Support noted.
12408	Mr R Craggs	I	O	Incomplete evidence base	<p>Incomplete evidence base.</p> <p>Concerns about: engagement with public; economic strategy; flood risk; GNDP structure; spirit of High Court Judgement not addressed; relationship of JCS, planning process and NDR; lack of trust; NDR will not resolve traffic problems; insufficient regard to outstanding permissions.</p> <p>Parish/Neighbourhood Plans would restore confidence and</p>	<p>Objection noted.</p> <p>Strategy based on full and robust evidence base, already established in adopted JCS updated as necessary. Confident that the methodology used is sound.</p>

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
					best preserve Norwich and Norfolk. Supports CPRE, NNTAG and SNUB	
Detailed Officer Response:						
Incomplete Evidence Base: Rail Based Movement; Movement/Development Capacity of Inner Link Road; Water Supply and Management in the Growth Triangle; Updated Housing Demand taking account of recent market conditions; consideration of nature and location of educational and leisure facilities.						
<p>Delivery of the strategy is not dependent on investment in rail infrastructure. However the existence of the railway line affords additional travel choice opportunities.</p> <p>Growth across Norwich is dependent on the implementation of the NATS strategy to manage travel demand. A key element of NATS is the NDR which will prevent unnecessary through trips and provide the capacity for the introduction of measures to support buses, walking and cycling. Without the introduction of the NDR and NATS the local impact of large scale growth in the north east would be unacceptable. Even with NATS and the NDR in place, an additional transport link connecting Broadland Business Park to Norwich International Airport via new growth areas will be required to provide local access and afford the opportunity to deliver fast and direct public transport and cycling facilities. This link in itself does not replace the need for the NDR.</p> <p>The issue of water supply and disposal in relation to the overall level of growth proposed across the Greater Norwich area, within the NPA and at specific growth areas, was considered through the Water Cycle Study produced as part of the evidence base for the JCS. This is considered sufficiently detailed in order to inform decisions at the strategic level. Any further site specific detail necessary will be investigated through the subsequent Area Action Plan and policy requirements which will oblige developers to address water issues, including management of surface water.</p> <p>As part of the SA/SEA process, the evidence for the level of housing requirement has been reviewed and the Topic Paper supporting the</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>adopted JCS updated to take account of any changes in background data. This document “Topic Paper Homes and Housing August 2012” supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains valid.</p> <p>The strategy provides for necessary infrastructure. Concentrated growth in the north east provides the best opportunity to support and deliver new infrastructure. Infrastructure needs are set out in Appendix 7 of the adopted JCS and expanded and kept up to date in the Local Infrastructure Plan and Programme. The detailed form and location of schools and leisure facilities is considered to be best dealt with through the Area Action Plan, at which point consideration will be given to the specific sites which will accommodate development.</p> <p>Economic strategy is wishful thinking; any identified industry would most likely locate close to technological research to SW.</p> <p>A range of economic evidence supports the JCS. The evidence takes account of recessionary impacts and makes a number of assumptions about growth. Even low growth scenarios forecast significant job growth and housing demand over the plan period to 2026. A realistic and reasonable baseline for the SEA must therefore assume significant levels of growth. The policy response to the evidence through the JCS needs to play its part in facilitating economic recovery. The implication of a longer and more severe economic downturn than forecast would be reflected in a timely review of the JCS</p> <p>Flood risk has been underestimated and anecdotal evidence disregarded.</p> <p>Surface Water Flooding issues are covered in adopted policy 1, which requires development to be located and designed to minimise and mitigate flood risk. New national legislation will require new development drainage permission as well as planning permission. This will ensure sustainable drainage is implemented on all sites. Other Local Plan documents, using evidence for the Norwich urban area from the recent surface water study, (which took account of anecdotal evidence) will provide more detailed policies if necessary in each district to ensure development addresses surface water flooding issues.</p> <p>Unelected GNDP is superfluous since the regional housing strategy was cancelled.</p> <p>Whilst the Government has announced its intention to rescind the Regional Spatial Strategies, at the time of writing it remains in force. Notwithstanding the above, the GNDP, as an informal, non decision-making body, is considered to have a role in supporting close co-</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>operation between the partners in accordance with Government's clear requirement for co-operation across districts.</p>						
<p>Reverting to Parish Plans would eradicate widespread resentment and restore confidence. Neighbourhood Plans will best preserve Norwich and Norfolk and remove the idea of enlarging Norwich to the size of Bristol or Nottingham</p>						
<p>The local authorities are supportive of parishes which wish to produce Neighbourhood Plans. However, this does not remove the need for a strategic plan dealing with issues such as housing, employment and transport which require coordination across multiple district areas.</p>						
<p>No credible effort to engage or public or address their questions. GNDP verbiage described by Justice Ouseley as "like wading through treacle".</p>						
<p>The process which has been undertaken directly follows the requirements of the High Court Order. Explanatory materials, including a non-technical summary to the Sustainability Appraisal, were provided as part of the publication of the proposed submission document in order to make an inherently complex process resulting from a legal challenge and consequent High Court Order as clear as possible.</p>						
<p>Views of CPRE, NNTAG and SNUB are consistent with our own</p>						
<p>Respondents support for CPRE, NNTAG and SNUB is noted. Separate replies have been prepared in response to the comments made by these groups at representations 12376, 12422 & 12425.</p>						
<p>GNDP have confused public by making JCS dependant on NDR without carrying out an environmental assessment, yet NDR has been reduced from full east to west link. The calling in of Postwick Hub has confused public further.</p>						
<p>The NDR forms part of NATS and as such lies outside the direct scope of the JCS as a whole including the proposed submission content, therefore a full assessment of the NDR in sustainability terms is not appropriate. Notwithstanding the above, growth across Norwich is dependent on the implementation of the NATS strategy, which is intended to manage travel demand. This provides the infrastructure to enable the introduction of further measures to support public transport, walking and cycling. The planning process for Postwick Hub, whilst being of relevance, is separate to that of the JCS.</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>Lack of trust demonstrated by overwhelming vote of no confidence</p> <p>The GNDP authorities are aware of a “vote of no confidence” taken at a public meeting in Rackheath. The decisions to publish, submit and adopt the JCS will be considered by locally elected councillors who are directly accountable to their constituents.</p> <p>At the EiP, the Inspector was not persuaded that such traffic problems would be resolved irrespective of whether NDR went ahead or not which was not contested but seems to be ignored.</p> <p>The independent Inspectors at the previous EiP found the JCS to be sound.</p> <p>Forget that a large number of houses have permission but there is not take up.</p> <p>Approved planning applications were accounted for in establishing the future requirement for housing allocations. This is shown in policy 4 of the adopted JCS. The overall housing figures were not remitted by the High Court judgement. In addition, it is a matter of public record that currently the GNDP authorities do not maintain a 5 year supply of housing land within the NPA. It is well documented that across the country that such an absence of land supply is becoming a driving force in the determination of planning appeals. Indeed, this has already been cited as a reason for approval on a number of planning appeals locally.</p>						
12409	Salhouse Parish Council	PC	O	<p>Do not agree that area can or should support massive levels of inward migration</p> <p>Objection on a wide range of planning and local democracy issues and over SEA methodology. Provides alternative growth</p>	<p>Do not agree that area can or should support massive levels of inward migration</p> <p>Objection on a wide range of planning and local democracy issues and over SEA methodology. Provides alternative growth locations.</p>	<p>Confident that each issue raised is addressed in strategy and that the methodology used for SEA is sound, covering appropriate growth locations. No need to withdraw JCS.</p>

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
				locations. JCS should be withdrawn.	JCS should be withdrawn.	
Detailed Officer Response:						
Do not agree that area can or should support massive levels of inward migration						
<p>The level of housing provision was not remitted by Mr. Justice Ouseley. It remains part of the adopted Joint Core Strategy and is not included in the proposed submission text.</p> <p>As part of the SA/SEA process, the evidence for the level of housing requirement has been reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document "Topic Paper Homes and Housing August 2012" supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains valid.</p> <p>No alternative analysis has been submitted to demonstrate that a lower level of housing provision is justified.</p> <p>Within the context of the remitted text, the SA has considered all reasonable alternatives. With regards to the additional options put forward by the respondent:</p> <p>Relocation of Norwich International Airport</p> <p>There are no clear, or substantive plans that the authorities are aware of for the relocation of Norwich International Airport. It is expected that any such proposal would itself require Environmental Impact Assessment, or SEA is enshrined in planning policy, the outcome of which cannot be prejudged in advance, and might rule out such a proposal. In the absence of clear and deliverable proposals for such a relocation, it is not considered that such an alternative could be considered reasonable.</p> <p>Acle Hub</p> <p>See comments in relation to NAA submission, representation 12418</p>						

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<p>Dispersal</p> <p>The potential for dispersal of the housing numbers was fully considered as part of the process of identifying Reasonable Alternatives. This consideration supported the conclusions that there was no scope for further dispersal to South Norfolk or Norwich, and that the appropriate level of dispersal within the Broadland part of the Norwich Policy Area was 2,000. This dispersed 2,000 within the Broadland part of the NPA forms part of the draft plan. All other development would need to be dealt with through strategic scale development within the Norwich Policy Area. The detail behind these conclusions is set out in 4.5 & 4.6 of the SA Report and Appendices E, F, G & H of the Technical Annex of the SA Report.</p> <p>Future Homes Commission</p> <p>The Future Homes Commission was set up by the Royal Institute of British Architects (RIBA) to conduct an independent inquiry into the quality of newly built housing. The commissions report includes discussion about how Britain can meets its housing needs, how funding for housing development could be secured, the design of new homes, how homes can be more responsive to consumer demand and the role of Local Government in achieving sustainable communities.</p> <p>The respondent's indicates that the conclusions of this commission are that 300,000 homes can be built annually on brownfield land near every city, town and village.</p> <p>This is not what the report finds. It is true that the report states that Britain needs to build between 300,000 and 330,000 new homes every year and that there is already a back log of 2 million homes resulting from past under investment. Also, that in order to meet these levels land will be needed in or close to virtually every city, town and village. It is also worth noting that the figure of 300,000 to 330,000 homes is a substantial increase above previous Government aspirations to deliver the 230,000 homes needed by newly forming households every year, as articulated through the Regional Spatial Strategies, and is in fact a three-fold increase in the number of homes currently being built every year. The statements in the report are clearly in support of the conclusion that there is a pressing need to build more homes. Enabling and managing the delivery of new homes is of course one of the central functions of the Joint Core Strategy, including the proposed submission content.</p>						

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<p>It is also noteworthy that the report also states that this cannot be achieved without councils and other public authorities energetically supporting new development and local communities accepting the need for new building.</p>						
<p>In the section entitled “supplying the land” the report does not state that 300,000 homes can be built annually on brownfield land. What it does state is that there are enough brownfield sites nationally to accommodate an additional 1.5 million more homes, citing a 2011 CPRE publication in support of this statement. However, the report makes no analysis of how quickly these sites could come forwards, or whether the rate at which urban land recycling might occur in order to maintain an ongoing supply of PDL development sites over a sustained period at the very high rate of 300,000 to 330,000 homes per year.</p>						
<p>Of course, none of this changes the requirement, as set out in the National Planning Policy Framework for the GNDP authorities to ensure the JCS meets the full, objectively assessed needs for market and affordable housing in the housing market area. Therefore, the essential question in the context of the JCS is not whether there are available PDL sites elsewhere, the development of which might contribute to the national need for housing, but rather how can the JCS best make use of locally available PDL in meeting the objectively assessed need for market and affordable homes, and other land uses such as employment uses. The JCS as a whole seeks to do exactly this by ensuring that the best use of available brownfield site in and around Norwich is achieved. In the context of the proposed submission content, the capacity of Norwich to accommodate further, redistributed, growth was considered as part of the process of defining Reasonable Alternatives. The conclusion of this assessment was that there was no meaningful scope for significant redistribution of additional housing to Norwich. This detail of this assessment can be found in appendix E of the Technical Annex to the Main Sustainability Appraisal Report.</p>						
<p>Development of agricultural land</p>						
<p>In order to meet housing need, development of agricultural land is necessary. The strategy largely avoids development of high grade agricultural land. Avoiding development of agricultural land in this area is unsustainable because it would not meet social and economic needs or would involve building on greenfield land not in agricultural use which would compromise environmental considerations.</p>						
<p>Lack of implementable plans for infrastructure provision</p>						

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<p>The strategy provides for necessary infrastructure. Concentrated growth in the north east provides the best opportunity to support and deliver new infrastructure. Infrastructure needs are set out in Appendix 7 of the adopted JCS and expanded and kept up to date in the Local Infrastructure Plan and Programme.</p> <p>Approach to consultation insufficient</p> <p>The consultation has been undertaken in line with the relevant regulations.</p> <p>Need to withdraw JCS and replace with local plans for each district supported by re-evaluation of housing numbers</p> <p>The local authorities are required to meet the objectively assessed needs of the area (see response on housing numbers).</p> <p>The authorities maintain that the joint approach set out in the JCS is the most appropriate means of dealing with development pressures locally to 2026 and do not intend to withdraw the JCS.</p> <p>Specific Issues</p> <p>There is no evidence that all options that were reviewed have been subject to full strategic environmental assessment. The original process examined 11 potential growth locations at three different scales of strategic growth and 7 potential combinations of those locations. However, the detail does not include an equitable assessment for every single option and only the three options put before the public in this consultation have had the benefit of these full assessments.</p> <p>Article 5(1) of the Directive requires an environmental report to be prepared considering reasonable alternatives. The High Court judgement is consistent with this. The initial evaluation of locations undertaken within the Sustainability Appraisal was undertaken with the express intention of identifying Reasonable Alternatives for the distribution of the development within the policies which were remitted by the High Court Order. There was no need to fully appraisal those alternatives which were unreasonable. Salhouse Parish Council's view that all identified Reasonable Alternatives have been appraised to an equitable level is noted and welcomed.</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>Water resources</p> <p>Water supply and quality have been covered by adopted policies 1 and 3 of the JCS. Policy 1 requires all development to minimise water use, to protect groundwater resources and to have no impact on European designated sites and species through surface water run off, water abstraction or sewerage discharge. Policy 3 sets some of the most demanding water efficiency standards nationally for new development to minimise its impact on water quantity and quality.</p> <p>This approach results from a rigorous evidence base and is supported by Anglian Water, Natural England and the Environment Agency. These organisations have signed a memorandum of understanding on this issue and continue to work together and with the GNDP to ensure that water quality and supply are taken account of through Anglian Water’s forward planning of water supply. A recent update on the 2010 Habitats Regulation Assessment has confirmed that the plan is unlikely to have negative effects on the water quality in the river Wensum. Natural England has confirmed that it is satisfied with this conclusion.</p> <p>Support CPRE</p> <p>See response to CPRE</p> <p>Natural Environment</p> <p>Landscape character was considered in the identification of sectors appropriate for development through objective 8 of SA framework. Broadland’s landscape character assessment was undertaken to identify particular landscape sensitivities. Whilst these sensitivities are not considered to preclude development, they will help to shape the form of new development.</p> <p>Public Transport and Climate Change issues</p> <p>Growth across Norwich is dependent on the implementation of the NATS strategy to manage travel demand. This provides the infrastructure to enable the introduction of further measures to support public transport, walking and cycling.</p>						

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<p>Code for Sustainable Homes</p> <p>The draft plan only considers the distribution and form of development. Improvements to energy efficiency ahead of national requirements based on High Code for Sustainable Homes levels for energy promoted in the submission version of the JCS were not accepted by the Inspectors.</p> <p>Local Democracy</p> <p>Decisions to publish, submit and adopt the JCS will be considered by locally elected councillors.</p> <p>Health and Social Care</p> <p>The strategy provides for necessary infrastructure. Concentrated growth in the north east provides the best opportunity to support and deliver new infrastructure. Infrastructure needs are set out in Appendix 7 of the adopted JCS and expanded and kept up to date in the Local Infrastructure Plan and Programme.</p> <p>Employment</p> <p>The JCS provides for 27,000 new jobs across the three districts rather than the NE growth triangle as indicated in the representation. The growth triangle is well related to significant job opportunities in the city centre and at Broadland Business Park and the Airport. Local employment opportunities are provided at Rackheath Industrial area and on the Salhouse Road.</p> <p>Development reliant on NDR</p> <p>The adopted strategy contains a contingency strategy for dealing with delay to, or non delivery of, the NDR.</p> <p>Railways</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>Delivery of the strategy is not dependent on investment in rail infrastructure. However the existence of the railway line affords additional travel choice opportunities.</p>						
<p>BRT</p>						
<p>BRT is at the heart of the NATS strategy. It is not simply about providing “bus lanes”, but is a whole package of measures including off bus ticketing, improved waiting facilities and high specification vehicles. The implementation of the NDR will help to enable improvements within the city centre to bus priority.</p>						
<p>Neighbourhood and Community Planning</p>						
<p>The local authorities are supportive of parishes which wish to produce Neighbourhood Plans. The existing attributes of the area which have been identified remain important and balancing these concerns against the need for new development will be an important part of the planning process as we go forward. Current approved planning</p>						
<p>Approved planning applications were accounted for in establishing the future requirement for housing allocations. This is shown in policy 4 of the adopted JCS. The overall housing figures were not remitted by the High Court judgement.</p>						
<p>Salhouse Conservation Area</p>						
<p>Any extension to the Salhouse Conservation Area will be taken into account when considering the form new development takes.</p>						
<p>Salhouse’s inclusion in the Norwich Policy Area</p>						
<p>The proposed policies and definitions in the Reg 25 Technical and Public consultations included Salhouse in the NPA. There were therefore two opportunities to influence this proposal, in late Summer 2008 and Spring 2009, in addition to the opportunity to raise a soundness objection when the JCS was subject to pre-submission publication in November/December 2009.</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>The Broads</p> <p>The JCS sets a requirement for a buffer zone to the NE of Rackheath to protect the Broads from any direct impact resulting from development. Wider considerations resulting from visitor pressure relating to the overall scale of growth will be addressed through the delivery of a green infrastructure network as provided for through policy</p>						
12410	RSPB	IG	S and O	<p>Support need for AAP Soundness objection concerning possible effects of development on the Broads Natura 2000 sites, particularly in relation to:</p> <ul style="list-style-type: none"> • inadequate assessment regarding water quality and quantity; • lack of detail on delivery of Green Infrastructure and the Broads buffer zone. 	<p>Support need for AAP Soundness objection concerning possible effects of development on the Broads Natura 2000 sites, particularly in relation to:</p> <ul style="list-style-type: none"> • inadequate assessment regarding water quality and quantity; • lack of detail on delivery of Green Infrastructure and the Broads buffer zone 	<p>Support for AAP noted Concerns relating to water and recreation provision noted, but confident that strategy is sound in regard to these issues. NE and EA support the approach on water and green infrastructure and agree with the Habitats Regulations Assessment conclusion (Appropriate Assessment).</p>
<p>Detailed Officer Response:</p> <p>Water quality and quantity</p> <p>Water supply and quality have been covered by adopted policies 1 and 3 of the JCS. Policy 1 requires all development to minimise water</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>use, to protect groundwater resources and to have no impact on European designated sites and species through surface water run off, water abstraction or sewerage discharge. Policy 3 sets some of the most demanding water efficiency standards nationally for new development to minimise its impact on water quantity and quality.</p> <p>This approach results from a rigorous evidence base and is supported by Anglian Water, Natural England and the Environment Agency. These organisations have signed a memorandum of understanding on this issue and continue to work together and with the GNDP to ensure that water quality and supply are taken account of through Anglian Water's forward planning of water supply. A recent update on the 2010 Habitats Regulation Assessment has confirmed that the plan is unlikely to have negative effects on the water quality in the River Wensum. Natural England and the Environment Agency are satisfied with this conclusion.</p> <p>Lack of detail on delivery of Green Infrastructure and the Broads buffer zone.</p> <p>The proposed submission text of the JCS sets out a specific requirement for a buffer zone to the NE of Rackheath to protect the Broads from any direct impact resulting from development. Wider considerations resulting from visitor pressure relating to the overall scale of growth will be addressed through the delivery of a green infrastructure network as provided for through policy. Infrastructure needs, including the need for green infrastructure, are set out in Appendix 7 of the adopted JCS and expanded and kept up to date in the Local Infrastructure Plan and Programme. Green Infrastructure will be delivered through a combination of site specific provision through new development and the use of CIL funding. Environment Agency and Natural England support this approach.</p>						
12411	Wroxham Parish Council	PC	O	Soundness objection due to incomprehensible document.	Lack of clarity about evidence base, concern for traffic on Wroxham Road.	Objection noted. Strategy based on full and robust evidence base. Confident that each issue raised is addressed in strategy and that the methodology used for SEA is sound, covering

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
						appropriate growth locations.
<p>Detailed Officer Response:</p> <p>Proposed Submission Content is difficult to understand and therefore not legally compliant</p> <p>Explanatory materials, including a non-technical summary to the Sustainability Appraisal, were provided as part of the publication of the proposed submission document in order to make an inherently complex process resulting from a legal challenge and consequent High Court Order as clear as possible.</p> <p>Proposed Submission Content has not been positively prepared as the Council(s) did not meet with residents prior to making a decision about the preferred strategy.</p> <p>The process which has been undertaken directly follows the requirements of the High Court Order.</p> <p>It is not clear which other sources of evidence, in addition to the Sustainability Appraisal were taken into account, in determining the most appropriate strategy.</p> <p>Paragraph 6.3.4 sets out other considerations that were taken into account, specifically identifying the deliverability of new development to meet soundness requirements and the potential to provide homes with the necessary services. The reason for Broadland District Council, Norwich City Council and South Norfolk Council's choice of Alternative 1 was clearly set out within the relevant Council Committee papers and minutes.</p> <p>Traffic issues in Wroxham</p> <p>The proposed submission documentation supports significant planned growth to the north east of Norwich. The location is favourable for growth as it provides for the opportunity for an urban extension close to existing strategic employment areas at Broadland Business Park and adjacent to Norwich International Airport. The NE is linked to Norwich by a number of radial routes including the A1151 and will</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>directly benefit from the construction of the Northern Distributor Route. These routes provide the opportunity to deliver high quality public transport, walking, cycling and vehicular connections.</p> <p>The focus of the growth is Norwich and the scale is such that the new development will include most of the day to day facilities and services required including healthcare, primary and secondary education, food shops green infrastructure and community facilities. Consequently growth in this location will not directly pressure the A1151.</p> <p>There will inevitably be some out commuting but the likely increases in these trips will be associated with development of new employment opportunities north of the River Bure.</p> <p>A potential source of increase in traffic would be related to leisure trips to the Broads and the North Norfolk Coast. Increases in visitor pressure on these sensitive sites have been considered in the Habitats Regulation Assessment (HRA). The HRA considers mitigation measures including management of visitor numbers and the provision of appropriate green infrastructure within the Growth Triangle.</p> <p>Overall the growth in the NEG T is not predicted to have a significant impact on the A1151 through Wroxham.</p>						
12412	Alan Quinn	I	O	Soundness objection due to incomprehensible document.	Unclear legal status of JCS. No rationale for housing or jobs targets. Uncertain of definition of 'affordable housing'. Loss of agricultural land. Queries the scale of development proposals in Aylsham, which are likely to be well beyond the 300 dwellings allocated in the JCS.	Objection noted. GNDP website explains status of JCS. Strategy based on full and robust evidence base. Confident that the methodology used is sound, covering appropriate growth locations. Please see JCS Glossary for definition of Affordable Housing. The

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						allocations in Aylsham are outside the scope of this consultation, so comments will be forwarded to Broadland District Council for further consideration.
<p>Detailed Officer Response:</p> <p>Public are unclear about legal status of the JCS</p> <p>The publication of the JCS Proposed Submission Content was in response to the High Court Order. An explanation of the legal status of the JCS as a consequence of the High Court Order was within the publication documents.</p> <p>No rationale for housing or jobs targets</p> <p>The level of housing provision was not remitted by Mr. Justice Ouseley. It remains part of the adopted Joint Core Strategy and is not included in the proposed submission text.</p> <p>Notwithstanding the above, as part of the SA/SEA process, the evidence for the level of housing requirement has been reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document “Topic Paper Homes and Housing August 2012” supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains valid.</p> <p>Similarly, the identified jobs targets and related employment policies were not affected by the High Court Order, with the exception of the employment land which is proposed to be allocated at Rackheath. The alternatives to the provision of the employment land at Rackheath in connection with the reasonable alternatives identified was considered in the Sustainability Appraisal Report.</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
Uncertain of definition of 'affordable housing'						
The definition of Affordable Housing is set out in the Glossary of the version of the Joint Core Strategy that was published as part of the Proposed Submission Document.						
Loss of agricultural land						
In order to meet housing need, development of agricultural land is necessary. The strategy largely avoids development of high grade agricultural land. Avoiding development of agricultural land in this area is unsustainable because it would not meet social and economic needs or would involve building on greenfield land not in agricultural use which would compromise environmental considerations.						
Query permission in Aylsham						
The JC policy in relation to housing at Aylsham was not affected by the High Court Order and lies outside the scope of this consultation. The scale of residential permissions granted at Aylsham after the adoption of the JCS will be taken into account when decisions are made about the scale and number of sites that will be subsequently allocated through the Site Allocations document.						
12413	Michael Sida	I	NA	Soundness objection concerning wording related to growth limits in Long Stratton.	Soundness objection concerning wording related to growth limits in Long Stratton. Policy 10 of the adopted recognises that there are constraints to the scale of growth in Long Stratton. Current evidence suggests that this will limit growth to the minimum of 1800.	Objection noted. Wording as adopted and recent SA work are compatible.
12414-	Barratt	D	S		Support inclusion of Rackheath	Support noted

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5	Strategic and Building Partnerships Ltd				low carbon community as developers who will deliver significant part of the strategy. Would welcome confirmation of approach to district centres in NEGТ through the AAP. Suggest amendments to Appendix 6 to show development has not yet commenced at Rackheath. Concern that SA underestimates the sustainability credentials of north east sector outside NDR in relation to biodiversity and landscape	
12418	Norfolk Association of Architects	IG	O	Soundness objection related to distribution of growth	Current recession and large stock of existing planning permissions provide sufficient time to enable a complete rethink of strategy. The current strategy will lead to poorly planned urban sprawl with poor access to services – the “Essexification” of Norfolk. An expanded Acle (10-15k population growth over 20 years) could meet the majority	The proposals are impractical as only very limited expansion of Acle is possible as the great majority of the land surrounding it is not suitable for development - there is grade 1 agricultural land to the west and the Broads, with land at high risk of flooding, to

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					of growth needs over the programmable future, along with existing permissions, limited infill and community expansion where wanted. Acle should be linked to Norwich and Gt Yarmouth by light rail network using funding currently dedicated to NDR.	the east, north and south.

Detailed Officer Response:

Alternatives involving differences of principle have not been investigated at all, and moreover seem not to have kept faith with the spirit of the judgement.

The authorities contend that this is simply not the case. By way of explanation, consideration must first be given to the judgement itself and subsequent order. The substance of the judgement was that the Sustainability Appraisal Report had not explained which Reasonable Alternatives to the North East Growth Triangle had been considered, or if no reasonable alternatives existed, why that was the case. The order then remitted (that is, returned to the draft stage) the content of those policies which related to the distribution of residential development within the Broadland part of the NPA, and to matters which were a direct consequence of the designation of the NEGTT.

Critically, the order did not quash the JCS either in part or as a whole. Nor did the judge see fit to quash, or even remit, the housing targets.

In order to address the consequences of the order the judge required a further Sustainability Appraisal to be prepared for the remitted policies, taking into account in particular the strategic growth in the North-East Growth Triangle and the reasonable alternatives (if any) to this.

Should, as is suggested by the Norfolk Association of Architects (NAA), the judge have intended there to be a full re-evaluation of the

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<p>principles of the strategy then it was open to him to quash the strategy as a whole, rather than only to return a specific part of the strategy back to the point before the proposed submission stage. Therefore, it is not considered that the contention of the NAA is accurate.</p> <p>The present submission is ... unsound and outside what might be defended as sustainable.</p> <p>The authorities are of the opinion that, within the scope provided by the remitted policies, the draft plan represents that most sustainable strategy when considered against all other reasonable alternatives. This is demonstrated within the Sustainability Appraisal Report that was published alongside the draft plan. No substantive or convincing evidence has been put forward by the NAA that would lead to a different conclusion.</p> <p>There are sufficient granted and unimplemented consents in the districts that comprise the GNDP to allow space in time for policies to be re-formulated at little risk to current housing programmes.</p> <p>The authorities do not concur with this view. It is a matter of public record that currently the GNDP authorities do not currently have a 5-year supply of housing land within the NPA. It is well documented that across the country that such an absence is becoming a significant consideration in the determination of planning appeals, and this has already been cited as a reason for approval on a number of planning appeals locally. This is causing significant concern within local communities and any undue delay which creates ongoing uncertainty is certainly not considered to be in the public interest. In addition, there are inherent risks associated with ad-hoc, piecemeal development for making joined-up planning decisions and delivering infrastructure.</p> <p>Crudely adding large numbers (of homes) to dispersed locations in fringe positions amounts to sprawl.</p> <p>A central part of the draft plan as submitted seeks to concentrate development (almost 80% of the total number of homes) in one particular area, the North-East Growth Triangle. Therefore the implied suggestion that the draft plan will further exacerbate problems of providing infrastructure for a dispersed population is unjustified.</p> <p>There is a need for a policy that will make a proper distinction between satisfying local community needs and dealing with relatively larger dormitory and “incoming growth”, which should better be concentrated.</p>						

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<p>It is the view of the authorities that the draft plan does exactly this. Through allowing for a floating allowance of homes (2,000) to be directed to fringe settlements and adjacent villages over the course of the next 14 years but concentrating almost 80% (7000) new homes over the same period to the North-East Growth Triangle a clear distinction, and appropriate balance between dispersed localised development and concentrated strategic development has been made.</p> <p>Growth should be allowed to evolve at whatever rate, and in whatever numbers until environmental capacity is reached.</p> <p>The numbers expressed for the Growth Triangle provides scope for development, which would eventually total 10,000 homes. The basis of this minimum number is to guarantee the long term viability of the new secondary school that would be required. This is within the evidenced environmental capacity of the area. Whilst 10,000 might be the limit of growth in this area, this is beyond the scope of the current plan to consider.</p> <p>Drawing attention to a supporting document, most recently entitled “Better Places for Living”.</p> <p>This document sets out a strategic approach to development, which is heavily reliant upon the delivery of a light and heavy rail system. This system, the so called “Yare Valley Transit”, is intended to utilise the existing Norwich to Great Yarmouth line with light rail extensions at the Norwich end from Thorpe to UEA, N&N hospital and science park, and at the Yarmouth end from the station to the sea front and outer harbour.</p> <p>No information has been provided about the feasibility of the delivery of such a transit system, in either financial, environmental or technical terms. NAA suggest that it could be possible to re-use NDR monies to fund Yare Valley Transit. Putting aside the fact that the NDR proposal lies outside the scope of the draft plan, as was held to be the case in the High Court, DFT monies granted to deliver a particular road project could not simply be redirected. Therefore the basis of the alternative strategy seems to be a transit system which has not been tested, to any degree, as to its technical or financial deliverability. In contrast the NDR has gone through significant DFT testing and is a key component part of the adopted NATS strategy, which also incorporates improved public transport in the form of BRT. It is also worthwhile noting that the Norwich to Cromer railway passes through the NEG, affording similar opportunities for heavy and light rail in connection with the draft plan, only with an additional possibility of a fast, direct and high quality bus service to Norwich.</p>						

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<p>The exemplar development proposed by NAA is for a sizeable development at Acle. Whilst the details of the proposed development are limited, the proposal states that it would seek to add 10 – 15,000 in population over a 20-year period. Assuming that current household size is maintained, this would equate to somewhere between 4,500 and 7,000 homes. It is not clear where these homes are to go. It is, however, worth noting that all of the land surrounding Acle is either within flood zone 2 (when the effects of climate change are accounted for) or surrounded by Grade I or II agricultural land (i.e. the best and most versatile agricultural land). The North East Growth Triangle is neither in a Flood Risk zone, nor is it wholly underlain by Grade I & II agricultural land (although some pockets of such land do exist).</p> <p>The NAA proposals have not been subject to any formal consultation process and therefore it is difficult to determine whether public support would be forthcoming. However, it seems likely that there would be public concern about major development proposals in the same way that there has been in other locations.</p>						
12419	PJ Shingfield	I	O		Object that scale of growth proposed is unnecessary, also concern over loss of green space and agricultural land.	Growth targets are evidence based. Growth locations avoid higher grade agricultural land and new development is required to provide green infrastructure.
<p>Housing Numbers</p> <p>The level of housing provision was not remitted by Mr. Justice Ouseley. It remains part of the adopted Joint Core Strategy and is not included in the proposed submission text.</p> <p>Notwithstanding the above, as part of the SA/SEA process, the evidence for the level of housing requirement has been reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document “Topic Paper</p>						

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<p>Homes and Housing August 2012” supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains valid.</p> <p>Loss of agricultural land.</p> <p>In order to meet housing need, development of agricultural land is necessary. The strategy largely avoids development of high grade agricultural land. Avoiding development of agricultural land in this area is unsustainable because it would not meet social and economic needs or would involve building on greenfield land not in agricultural use which would compromise environmental considerations.</p>						
12420	Barton Willmore on behalf of Landstock Estates and Landowners Group	D	Object		Do not object to strategy. Seek early release of land in the NEGТ and review of housing chapter to redistribute growth to other areas of the NPA to address slow delivery in the triangle.	No objection noted. Early release of land depends on submission of planning applications. Distribution of growth informed by likelihood of delivery. Consideration of redistribution would require a review of the plan which could lead to additional delays in bringing sites forward.
<p>Detailed Officer Response</p> <p>The housing requirement as set out in Appendix 6 cannot be met and therefore a reserve or fall-back position should be</p>						

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<p>adopted that provides for the redistribution of any shortfall to Main Towns in the NPA.</p>						
<p>The only Main Town within the NPA is Wymondham. Re-allocation of growth, even as a reserve position, would require a full review of the JCS adding to uncertainty and resulting in severe delays to delivery. As set out with section 4.9 of the sustainability appraisal, owing to limitations to the capacity for secondary school expansion the scale of growth within Wymondham is limited to the 2,200 units which already form part of the adopted JCS. Therefore further redistribution of development to Wymondham would not be able to be properly served in terms of High School Places. This is contrary to the adopted Policy 7 of the JCS and the NPPF when considered as a whole.</p>						
<p>The housing trajectories within Appendix 6 of the JCS post dates the NPPF but are not up-to-date and do not provide for any flexibility relating to non-delivery. The trajectory does not take account of the need to provide for an additional buffer move forward from later in the plan period as required by the NPPF. In order to achieve compliance with the NPPF, a clear statement is required to be included either as part of the PSC consultation or as a freestanding “Compliance Statement”</p>						
<p>The trajectories are illustrative and do not provide any policy restriction or phasing. Therefore, they have no impact on flexibility. The overall housing target and trajectory totals were not remitted as a consequence of the High Court Order. The only part of Appendix 6 directly affected is the Growth Locations Trajectory.</p>						
<p>It is not contested that there is a variance between the Growth Locations housing trajectory within Appendix 6 and recent housing delivery within the NEG. The requirement of the NPPF is that the expected rate of housing delivery be illustrated through a housing trajectory. This requirement cannot be interpreted as the need to make exact predictions about the rate of development that will occur. The exact rate of housing delivery across the plan period will vary from the trajectory to some degree. This is equally true in the early years as it is in later years. The housing trajectory illustrates how growth can be delivered across the plan period rather than an exact forecast. The updated Topic Paper: Homes and Housing which was published alongside the Proposed Submission Content explains that despite under delivery relative to the housing trajectory in the early years of the plan there remains a reasonable likelihood that this can be addressed through strong delivery in the middle years of the plan on allocated sites.</p>						
<p>Appendix 6 of the PSC JCS should be amended to reflect the delay in adopting and implementing housing delivery in the NEG</p>						

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<p>otherwise the PSC is “unsound”.</p> <p>For the reasons set out above it is not considered that the slight variance from the growth locations housing trajectory, years 2011/12 & 2012/13 can be considered sufficiently significant as to call into question the proposed submission content strategy when considered in the round.</p> <p>In order to meet its housing requirements and be in conformity with the NPPF BDC needs to provide for contingency sites within subsequent AAPs and approve suitable and sustainable departure planning applications.</p> <p>The allocations required in the AAP will be determined through the plan production process for that DPD, although clearly within the context of the framework established by the JCS..</p> <p>Broadland District Council has adopted and published an interim policy statement entitled Policy Statement on Determination of Housing Developments in Advance of the Emerging Local Plan. This statement sets out the main considerations which could be taken into account and states clearly that it would be inappropriate to refuse applications simply because the site is not allocated.</p> <p>In order to demonstrate how the minimum requirements of the JCS will be met and how the GNDP authorities will “boost significantly the supply of housing” additional wording should be added to the JCS supporting the principle of early site release to address the immediate housing land supply position.</p> <p>In accordance with section 38(6) of the planning and compulsory purchase act, the GNDP authorities will determine planning application in accordance with the development plan unless material considerations indicate otherwise. National planning policy is a material consideration in the determination of planning applications. The National Planning Policy Framework establishes a clear presumption in favour of sustainable development. It also makes it clear that when an authority does not maintain a five year supply of housing land, applications for residential development should be approved unless it can be demonstrated that the detrimental effects of development clearly outweigh the benefits. In addition, Broadland District Council has published its own interim policy statement, which clarifies how it will treat applications for planning permission submitted in advance of the allocation of sites through site specific DPDs.</p>						

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<p>Within the context, it is considered that an additional statement within the JCS would not make more likely the early release of sustainable housing sites and would simply be a repetition of existing national planning policy, as set out within the NPPF.</p>						
<p>The treatment of Windfall permissions is questionable. The original Topic Paper: Homes & Housing (August 2010) indicated that “the JCS provision is intended to be delivered through allocations so windfall development will be in addition”. However, permissions granted after the base date of the JCS are being retrospectively labelled as “allocations”, thereby removing the planned flexibility intended within the JCS and limiting growth to the absolute minimum set out within the plan.</p>						
<p>The respondent raises concerns about the wording of a Topic Paper, not the policies of the adopted or proposed submission JCS. There is no requirement in the JCS to treat all windfalls granted since 2008 as additional growth. The Topic Paper: Homes & Housing (August 2008) has been updated and was published alongside the JCS Proposed Submission Content. This clarified that windfall development taking place after the allocation of sites would provide additional flexibility in the supply of housing. Site Specific documents are currently being prepared for each of the three GNPD authorities. In broad terms the original estimates for windfall development in the Topic Paper remain valid. Windfall development is inherently uncertain but could account for an additional 5000 units over the plan period..</p>						
<p>A positive and proactive approach needs to be taken to demonstrate how, in the next 5 year period the BDC NPA housing target will be met. The NEGTT cannot be relied upon to address this shortfall, and further early releases of land area required, even if the overall capacity of the NEGTT is maintained. BDC must determine planning applications taking into account the 5 year land supply position and the principle of this approach should be reflected in the wording of the JCS.</p>						
<p>Broadland District Council will continue to determine applications for planning permission in accordance with S.38(6) of the Planning and Compulsory Purchase Act 2004. This requires that applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. Material considerations include the NPPF which states quite clearly that regard should be had to five year land supply and how applications should be treated in the absence of such supply. Additional wording within the JCS would be an unnecessary repetition of national policy. The only impact of repeating national policy within the JCS would be to make it less flexible to any subsequent changes in national policy,.</p>						
<p>The land promoted within Appendix 1 of the supporting documentation represents a good opportunity for BDC to positively</p>						

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<p>respond to the requirements of the NPPF and JCS, in accordance with the principles of the NEGТ. Further supporting information for the site is provided by the respondent, for the sake of brevity the information is not repeated here.</p> <p>The GNDP authorities note that the respondent wishes to promote their site for development ahead of the NEGТ Area Action Plan. The determination of which sites should be identified for development will be dealt with through the Area Action Plan or through the determination of planning applications in accordance with the rationale set out above. It is also noted that large parts of the land identified by the respondent, Postwick Hub and Brook Farm, have already been granted planning permission, or have a resolution to grant planning permission, ahead of the plan making process. This is a clear example of Broadland District Council's proactive and pragmatic approach to dealing with applications ahead of the plan making process and further demonstrates that adding text to the JCS would be an unnecessary repetition of national policy.</p>						
12421	Breckland Council	N	Comments		Request continued co-operation of GNDP in relation to visitor pressure effects of growth on protected species in Thetford Forest, particularly at High Lodge	Comment noted. Agree need to continue to work on issue, also taking account of the visitor pressure effects of growth in Breckland on protected species in the Broads and elsewhere in the GNDP area
12422-4	NNTAG	IG	O		Delivery of 9,000 dwellings by 2026 unrealistic therefore unsound – strong grounds for reviewing numbers and rolling plan forward beyond 2026: <ul style="list-style-type: none"> Recent housing delivery locally 44% below target 	Objection noted. GNDP officers are confident all issues have been addressed and strategy is justified. Please see full response where Issues are addressed

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					<ul style="list-style-type: none"> • Recession set to continue • Mortgages restricted <p>GNDP stated it would review strategy due to changed economic circumstances in 2010 – the work for the resubmission does not constitute an adequate review.</p> <p>High housing allocation for NPA encourages developers to submit speculative planning applications. NPPF (para 153) requires review of Local Plans to respond to changing circumstances and market and economic signals (para 158).</p> <p>Soundness:</p> <p>i) Not positively prepared – scale and location of growth have been determined by GNDPs list of infrastructure demands. NDR would have negative effects on Broads,</p>	in detail.

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					<p>landscape setting of Norwich and carbon emissions. Insufficient focus on role of railways in NE. Alternative solutions for schools possible with more growth focussed at Wymondham.</p> <p>ii) Not justified – not most appropriate strategy.</p> <ol style="list-style-type: none"> 1. Should reduce housing numbers to take account of economic conditions eg lower reduced housing numbers in North Sprowston and Old Catton planning application shows doubts over viability. 2. Should have assessed south west of Norwich and combined option of NE and SW sectors. <p>Good transport links in SW and access to employment. Limited growth in NE could be served by developer funded link roads.</p>	

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					<p>iii) Not Effective Proposed submission does not make best use of existing infrastructure, including BRT route on Newmarket Road to serve SW. Fails to make use of potential for limited road building in NE without NDR to serve development as proposed for North Sprowston/Old Catton.</p> <p>iv) Not consistent with national policy – Alternative 1 inconsistent with NPPF requirement to protect natural and historic environment (para 7) and promote sustainable transport (para 30).</p> <p>2. Legal requirements</p> <p>Does not comply with SA requirement to consider all reasonable alternatives.</p> <p>1) Methodology screens out reasonable alternatives</p>	

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
					<ul style="list-style-type: none"> 2) GNDP starts by opting for a single location on the basis of their demand for infrastructure 3) 7000 dwellings rising to 10,000 dwellings after 2026 screens out combinations of non-adjacent sectors 4) Lack of consistency in sustainability assessment between options in long list such as some sectors being shown as red due to coalescence of settlements but not in others, impact on wooded parklands and over transport and the need to travel 5) Alternative 3 on the short list is poorly conceived, eg. Self-evident that BRT is non-viable for serving developments of 1000 dwellings 6) SA appears biased in 	

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					<p>favour of Alternative 1 as does not give enough weight to impact on Broads and inconsistencies in considering social and economic benefits for wards suffering deprivation in Norwich</p> <p>7) It isn't clear what other considerations have been taken into account in selecting the preferred alternative due to GNDP's decision making largely carried out behind closed doors and with a lack of public engagement</p> <p>Necessary changes</p> <p>Maximum of 7000 dwellings, with 2000 in rural area as proposed and 3500 as an extension to NE Norwich and approx 1500 to SW of Norwich</p>	

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					<p>SA must be made consistent in assessments of SW and NE options, with short list of alternatives including SW of Norwich and a combination of NE and SW sectors.</p> <p>Policies map – soundness:</p> <p>Object to notation and label for Postwick Hub, which was deleted by the Inspector and replaced with “appropriate improvements to Postwick junction improvements”</p>	
<p>Detailed Officer Response:</p> <p>Housing Numbers</p> <p>The level of housing provision was not remitted by Mr. Justice Ouseley. It remains part of the adopted Joint Core Strategy and is not included in the proposed submission text.</p> <p>Notwithstanding the above, as part of the SA/SEA process, the evidence for the level of housing requirement has been reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document “Topic Paper Homes and Housing August 2012” supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains valid.</p>						

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Economic strategy, previous commitment to an early review						
<p>A range of economic evidence supports the JCS. The evidence takes account of recessionary impacts and makes a number of assumptions about growth. Even low growth scenarios forecast significant job growth and housing demand over the plan period to 2026. A realistic and reasonable baseline for the SEA must therefore assume significant levels of growth. The policy response to the evidence through the JCS needs to play its part in facilitating economic recovery. The implication of a longer and more severe economic downturn than forecast would be reflected in a timely review of the JCS</p>						
Positively Prepared						
<p>Alternative strategies to redirect growth within the Norwich Policy Area south of Norwich were considered as part of the process of defining reasonable alternatives within the Sustainability Appraisal Report. All options for growth south of Norwich were considered in the main SA report (see section 4.9).</p>						
<p>The South-West Sector was considered to have capacity for large scale strategic growth. Consequently, it was identified as a reasonable alternative and tested against the other reasonable alternatives, which focused development to the north-east of Norwich. However, because of the number of growth locations in the surrounding area (e.g. Hethersett and Wymondham) there were concerns about the likely deliverability of the south-west alternative. There were also concerns about the impact upon the form and character of settlements along the A11, the limited opportunities for enhancement of GI links and the fact that resultant levels of growth which would need to occur in the north-eastern sector would not support high quality, BRT, public transport services.</p>						
<p>In terms of Wymondham specifically, the conclusion of the above process was that Wymondham was suitable for up to 2,200 dwellings. Development exceeding this level would exceed the capacity of the High School. Therefore any further capacity would depend upon enough development being allocated to Wymondham to justify, and secure the long term viability, of a new secondary school. This would require a further 7,000 to 10,000 new dwellings. Such a level of growth would be likely to have a significant detrimental impact upon the setting and historic character of the town.</p>						
<p>The NDR forms part of NATS and as such lies outside the direct scope of the JCS as a whole including the proposed submission content,</p>						

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<p>therefore a full assessment of the NDR in sustainability terms is not appropriate. Notwithstanding the above, growth across Norwich is dependent on the implementation of the NATS strategy, which is intended to manage travel demand. This provides the infrastructure to enable the introduction of further measures to support public transport, walking and cycling.</p> <p>Delivery of the strategy is not dependent on investment in rail infrastructure because NATS provides scope for high quality bus services which connect the North East Growth Triangle to Norwich. However, the existence of the railway line affords additional travel choice opportunities.</p> <p>Not Justified</p> <p>Comments covered in explanation provided above.</p> <p>Not Effective</p> <p>Proposed submission documents cannot be considered outside the context of the JCS strategy as a whole. When looked at in its entirety the strategy is considered to respond positively to NATS, including making use of the Newmarket Road BRT corridor which will serve at least 4,400 new dwellings based upon the adopted JCS.</p> <p>Growth across Norwich is dependent on the implementation of the NATS strategy to manage travel demand. A key element of NATS is the NDR which will prevent unnecessary through trips and provide the capacity for the introduction of measures to support buses, walking and cycling. Without the introduction of the NDR and NATS the local impact of large scale growth in the north east would be unacceptable. Even with NATS and the NDR in place, an additional transport link connecting Broadland Business Park to Norwich International Airport via new growth areas will be required to provide local access and afford the opportunity to deliver fast and direct public transport and cycling facilities. This link in itself does not replace the need for the NDR.</p> <p>Not consistent with national policy: Promoting Sustainable Transport and Protecting the Historic Environment</p> <p>As set out above, the strategy is consistent with NATS which seeks to manage travel demand and provides the infrastructure to enable the</p>						

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<p>introduction of further measures to support public transport, walking and cycling. Whilst the strategy will clearly have a significant impact upon the landscape, it will protect the most important aspects of the historic environment.</p>						
<p>Legal requirements</p>						
<p>As stated in the comments above a full range of possible alternatives for redistributing growth were considered as part of the definition of reasonable alternatives.</p>						
<p>The Sustainability Appraisal has screened out reasonable alternatives such as strategic growth split between non-adjacent sectors.</p>						
<p>Strategic growth split between non-adjacent sectors ceases to be strategic growth and becomes larger allocations of small scale growth. The capacity of different sectors to accommodate non-strategic growth (less than 1000 homes) was fully explored as part of the Sustainability Appraisal. The conclusion was that there was no scope in either Norwich or South Norfolk to accommodate such growth. An allocation of 2,000 homes is included in the draft plan to provide for non-strategic scale growth in the Broadland part of the NPA.</p>						
<p>The evaluation of the impact of development in terms of character for different sectors is a combination of considering the scale of growth being evaluated and the landscape sensitivities identified for a particular area. The disparity in terms of the evaluation of the north-east sectors inside and outside the NDR was a consequence of the relative rurality of the area outside the NDR, compared to the greater influence of the urban area inside the NDR. As a consequence, the impact on the character of the area was considered to be greater outside the proposed route of the NDR route than within it. Allowing some development outside the NDR will allow for a lower level of development, and hence more limited landscape impacts, inside the NDR. This was reflected in the evaluation. The commentary, which goes alongside the traffic light assessment, still acknowledges that impact outside the NDR would be significant.</p>						
<p>In terms of transport and need to travel, the difference between a green and amber score in the Sustainability Appraisal can sometimes be relatively small. This is why additional commentary is provided. In this instance, the supporting commentary acknowledged that both sectors benefit from good accessibility to employment and other public transport links. However, as the north-east sector inside the NDR is contiguous with the existing urban fringe, large parts of it are closer to the city centre than the south-west sector. In addition, for much of</p>						

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<p>the area there will be no need to cross a significant road. Therefore a better score was assigned to the north-east sector.</p>						
<p>The reasonable alternatives identified were derived from the preceding evaluation of the capacity of sectors to accommodate strategic scale growth. The results of this evaluation showed that Alternative 3 would be able to meet the objectives of the plan. Understandably, where multiple reasonable alternatives are identified not all will perform equally well. In this instance a particular consequence of Reasonable Alternative 3 was that it would not support BRT in the NE Sector. This was reflected in the appraisal of this alternative and formed part of the reason for its rejection.</p>						
<p>In comparing the reasonable alternatives the Sustainability Appraisal acknowledges that it is not possible to differentiate between the three alternatives in terms of significant effects in relation to Sustainability Objective SOC1: To reduce poverty and social exclusions. However, alternatives 1 and 2 would have benefits in terms of supporting significantly improved public transport serving deprived areas, which would not be deliverable without significant development in the NE sector. This contrasts with other BRT routes, which would be delivered without additional growth being reassigned to other areas.</p>						
<p>Paragraph 6.3.4 sets out other considerations that were taken into account, specifically identifying the deliverability of new development to meet soundness requirements and the potential to provide homes with the necessary services. The reason for Broadland District Council, Norwich City Council and South Norfolk Council's choice of Alternative 1 was clearly set out within the relevant Council Committee papers and minutes.</p>						
<p>Alternative solution proposed: a limited review of the 9,000 housing figure remitted by the High Court. Of this figure, 2,000 dwellings are allocated to Broadland rural area – we don't have a problem with this. Of the 7,000 dwellings (rising to 10,000 post 2026), we advocate deferral of 2,000 until the next plan period post 2026 (i.e. not to allocate 2,000 dwellings rising to 5,000 post 2026 at Rackheath). Alternatively, finding sites for 2,000 dwellings in the current plan period should be left to windfall permissions in the three districts.</p>						
<p>The court order required that a new Sustainability Appraisal be produced for those parts of the JCS which were remitted, taking into account in particular the strategic growth in the North-East Growth Triangle and the reasonable alternatives (if any) to this.</p>						

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<p>The court order did not remit the minimum figures identified for the NPA or GNDP area as a whole, despite the claimants' request to do so. It is therefore quite clear that these were not, as a matter of course substance for the Sustainability Appraisal required. Clearly, this does not prevent the Authorities determining to "start again" and re-look at all issues. However, it is not considered that the evidence indicates that housing need or demand has altered substantially since the housing targets of the JCS were tested at examination despite the recent history of disappointing housing delivery, and in any case the RSS currently remains in force. It would therefore be inappropriate to pursue a full review and increase uncertainty without good reason to do so.</p> <p>On this basis a strategy which seeks to delivery only part of the minimum number of homes as are required cannot be considered to satisfy the objectives of the plan, and as such cannot be considered a Reasonable Alternative at all.</p> <ol style="list-style-type: none"> 1. The south-west of Norwich (A11 – B1108) 2. A combination option comprising the north-east and south-east sectors. For example, we suggest 3,500 in an extension to north-east Norwich and 1,500 in the A11 – B1108/Wymondaham area. An extension of 3,500 homes at Sprowston/Old Catton would in combination with planned housing (approx 1,800 dwellings at Blue Boar Lane/Brooke Farm) would create demand for a new secondary school. <p>With regards to the first alternative proposed, Reasonable Alternative 3 considered directing further development to the south-west sector. However, because of the number of growth locations within and around the south-west sector, there were concerns about the likely deliverability of the south-east alternative. There were also concerns about the impact upon the form and character of settlements along the A11, the limited opportunities for enhancement of GI links and the fact that resultant levels of growth which would need to occur in the north-eastern sector would not support high quality, BRT, public transport services. Consequently, it was not considered that this alternative performed as well as the preferred solution that forms the substance of the draft plan.</p> <p>With regards to the second alternative proposed by NNTAG, provision is only made for 5,000 of the 9,000 homes which are required to be delivered for conformity with the adopted JCS. Therefore, it cannot be considered to be a reasonable alternative at all. Putting this key consideration aside, whilst the additional level of development proposed to the south-west sector might be able to be accommodated in the form proposed, although there may well be high school capacity issues, the proposed level of development to the NE of Norwich is likely to have a number of negative impacts. Specifically, provision is only made for 5,300 dwellings. 1,200 of these were permitted at the</p>						

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<p>base date of the plan and the resultant children would be accommodated within existing high schools. The children from the further 4,100 would overwhelm existing high school capacity without providing the necessary level of development to support a new high school, irrespective of whether NNTAG's 6,000 minimum benchmark for a new high school is used or the 7,000 preferred within the consideration of alternatives for the draft plan. The reason why the figure of 7,000 was used for the purposes of defining reasonable alternatives is that 6,000 is the minimum number of contributing dwellings to support a secondary school. Clearly, not all dwellings in a growth area will contribute, or will contribute at a lower than typical rate e.g. small flats or houses or retirement homes. In addition, there is generally a small element of flexibility in high school capacity which will wax and wane year on year. Using the higher minimum figure of 7,000 mitigates these risks and gives certainty about the long term viability of a secondary school.</p> <p>In addition, whilst arguably the proposal would meet minimum critical mass to support BRT Services, the likelihood is that this will be dispersed across three radials which are some distance apart, meaning in practical terms the critical mass threshold will not be met. In addition, the bulk of development would be focused on the Wroxham Road, which has identified road capacity constraints inside the inner ring road, which are unlikely to be able to be resolved. These constraints would not allow for high quality bus prioritisation through to the city centre unless the route is deflected onto another radial, which would further compromise its speed, directness and consequently its attractiveness as an alternative to the private car.</p>						
12425	SNUB	IG	O		Concern over issues including: process; water supply & drainage; climate change; duty to cooperate; health & social care; justification of housing numbers; agricultural land; infrastructure; air safety, economics; education.	Objection noted. GNDP officers are confident all issues have been addressed and strategy is justified. Please see full response where Issues are addressed in detail.
<p>Detailed Officer Response:</p> <p>Consultation form does not enable alternative views to be given and is counter to the principles laid out in the Aarhus Convention</p>						

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12425.1.				The form responds to the requirement of the regulations.		
						<p><u>Process</u></p> <p>Do not believe that there have been any material changes to due process at the GNDP and BDC since the High Court hearing. Overreliance on tricky to find soft copy material with hard copies difficult to obtain. Extension welcomed, but legitimate requests for further extensions declined. Concur with the view of the independent enquiry commissioned by BDC who found their process to be infected. This infection remains and discredits any reasonable test of soundness.</p>
12425.2.				The process which was undertaken directly follows the requirements of the High Court Order. Explanatory materials, including a non-technical summary to the Sustainability Appraisal, were made widely available as part of the publication of the proposed submission document in order to make an inherently complex process resulting from a legal challenge and consequent High Court Order as clear as possible.		
						<p><u>Environment</u></p> <p>Failure to undertake a SEA on ALL reasonable alternatives, rather than those preferred by the GNDP. The options presented in this proposal are flawed due to the absence of any new alternatives such as those proposed in our separate document. Due consideration has not been given to the impact on water supplies in a region that is identified by the EA as having moderate water stress, flood risk at locations where Anglian Water has identified there could be potential problems from new or expanded treatment facilities and also from rising sea levels, sewage given capacity issues at Whitlingham. Significant concerns raised about Surface Water Flooding within the Growth Triangle area. CPRE have gone on record to voice their concerns about overdevelopment and the impact on the Broads.</p>
12425.3.				The SEA involved an evidence-based staged approach to consideration of potential alternatives. These were assessed against the adopted objectives of the JCS. This culminated process in the identification of 3 reasonable alternatives, which were tested through SA in compliance with the Directive. Article 5(1) of the Directive requires an environmental report to be prepared considering		

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<p>reasonable alternatives. The High Court judgement is consistent with this. The initial evaluation of locations undertaken within the Sustainability Appraisal was undertaken with the express intention of identifying Reasonable Alternatives for the distribution of the development within the policies which were remitted by the High Court Order. There was no need to fully appraisal those alternatives which were unreasonable, as stated in the Directive.</p>						
<p>12425.4. Water supply and quality have been covered by adopted policies 1 and 3 of the JCS. Policy 1 requires all development to minimise water use, to protect groundwater resources and to have no impact on European designated sites and species through surface water run off, water abstraction or sewerage discharge. Policy 3 sets some of the most demanding water efficiency standards nationally for new development to minimise its impact on water quantity and quality.</p>						
<p>12425.5. This approach results from a rigorous evidence base and is supported by Anglian Water, Natural England and the Environment Agency. These organisations have signed a memorandum of understanding on this issue and continue to work together and with the GNDP to ensure that water quality and supply are taken account of through Anglian Water's forward planning of water supply. A recent update on the 2010 Habitats Regulation Assessment has confirmed that the plan is unlikely to have negative effects on the water quality in the river Wensum. Natural England has confirmed that it is satisfied with this conclusion.</p>						
<p>12425.6. As with water abstraction, the issue of surface water flooding as a general concern was dealt with through the original JCS submission, and its supporting Sustainability Appraisal. Surface Water Flooding issues are covered in adopted JCS policy 1, which requires development to be located and designed to minimise and mitigate flood risk. In addition, the non-remitted part of policy 10 requires major development to include Sustainable Urban Drainage Systems.</p>						
<p>12425.7. New national legislation will require new development to have drainage permission as well as planning permission. This will ensure sustainable drainage is implemented on all sites. Other Local Plan documents, using evidence for the Norwich urban area from the recent surface water study, will provide more detailed policies if necessary in each district to ensure development addresses surface water flooding issues.</p>						
<p>12425.8. Clearly, in advance of specific site being identified it is not possible to identify specific mitigations. Therefore further policy requirements related to specific sites are, in accordance with Article 5(2) more appropriately assessed within Site Specific planning</p>						

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documents, in the case of the proposed NEG T an Area Action Plan. Indeed, the details of such mitigations might be best designed by developers as part of the production of individual masterplans, with policy development concerning itself only with questions of principle.						
Concerns raised about the Growth of Norwich to the size of Nottingham or Bristol						
12425.9. The JCS does not promote the growth of Norwich to the size of Nottingham or Bristol. Nottingham had a total population of around 660,000 at the time of the 2001 census, at the same point in time Bristol has a total population of around 550,000. The population of the Norwich Urban Area is currently estimated to be around 210,000. Depending upon the final distribution of housing allocations the population of the Norwich Urban Area is expected to rise by around 40-50,000 people by 2026. Based upon this estimate the Norwich Urban Area population would still be less than half of the size Nottingham or Bristol were over a decade ago in 2001.						
12425.10. See response to CPRE, representation 12376 with regard to SNUB comment on CPRE concerns about impact upon Broads.						
<u>Sustainability</u>						
These proposals directly contradict the aims and objectives of the Landscape Character Assessment Review as the NEG T would change the areas identified irreversibly. Current LCA is intuitively opposed to such large scale development.						
12425.11. Landscape character was considered in the identification of sectors appropriate for development through objective 8 of SA framework. Broadland's landscape character assessment was undertaken to identify particular landscape sensitivities. Whilst these sensitivities are not considered to preclude development, they will help to shape the form of new development.						
Impact on ancient woodland adjoining Beeston Park which includes habitats for Great Crested Newts and bats. The Natural Environment White Paper has not been taken into account in the consideration of the Proposed Submission Content.						
12425.12. Policies in the adopted JCS and the NPPF afford appropriate protection to ancient woodlands and protected species. These issues are more appropriately dealt with through subsequent Site Specific documents. SNUB make reference to an ecological survey for an area of Ancient Woodland adjacent to Beeston Park. This is believed to relate to work associated with the Northern Distributor Road,						

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<p>which has no direct bearing on the proposed submission content. Appropriate environmental assessments will support any application for the NDR and development within the Growth Triangle. Habitats and species will benefit from the connectivity provided by the Green Infrastructure Network which will be delivered through development. The content of the Natural Environment White Paper is discussed in section 3.3 of the Sustainability Appraisal, which established the sustainability context for the Sustainability Appraisal.</p>						
<p>There has been scant regard to the impact these proposals will have on the carbon footprint, particularly in regard to the NDR, and does not negate the impact of climate change. Section 10 of the NPPF, entitled “Meeting the Challenge of Climate Change, Flooding and Coastal Change”, is the most relevant to Norfolk.</p>						
<p>12425.13. The NDR forms part of NATS and as such lies outside the direct scope of the JCS as a whole including the proposed submission content. Notwithstanding this, growth across Norwich is dependent on the implementation of the NATS strategy, which is intended to manage travel demand. This provides the infrastructure to enable the introduction of further measures to support public transport, walking and cycling.</p>						
<p>12425.14. Consideration has been given to the impact of the reasonable alternatives in terms of reducing the impact of traffic on the environment and adapting to and mitigating against the impacts of climate change. Whilst not comprising a “full carbon assessment” the level of detail included was considered sufficiently detailed to enable effective comparison given the content and level of detail of the plan.</p>						
<p><u>Additional Comments by URS in regards Carbon Assessment</u></p>						
<p>12425.15. The preferred and alternative approaches that were the subject of appraisal are ‘strategic’ in nature. Specifically, they are not defined in terms of precise locations for development or descriptions of development that would come forward. Without this knowledge, a detailed carbon assessment would need to rely heavily on assumptions.</p>						
<p>12425.16. Despite the strategic nature of the plan approaches under consideration, the SA was still able to draw conclusions regarding greenhouse gas emissions. This discussion is set out under <i>ENV9: To adapt to and mitigate against the impacts of climate change</i>. The appraisal focused on: A) likely significant effects on car dependency; and B) likely significant effects on the potential to design-in community level low carbon energy. In terms of (A), it was not possible to identify significant effects on the baseline, but it was possible to</p>						

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<p>conclude that Alternative 3 is less than ideal. In terms of (B) it was concluded that all approaches would result in significant positive effects (it was not possible to identify relative merits).</p>						
<p>Originally 4000 homes were to be built at Rackheath to Sustainable Code 6. However many have now been downgraded to Code 4. This means that new build housing in the Growth Triangle will be of no greater standard than other new build housing.</p>						
<p>12425.17. The draft plan considers principally the distribution and form of development. It is worth noting that improvements to energy efficiency ahead of national requirements based on High Code for Sustainable Homes levels for energy promoted in the submission version of the JCS were not accepted by the Inspectors. High levels of water efficiency within new build housing are still required as a consequence of the adopted policies of the JCS. Notwithstanding the above, submitted text, paragraph 6.7, continues to seek that development to eco-town standards. Within this context, the PPS1 Eco-Towns supplement remains government policy as one of the few documents not replaced by the NPPF.</p>						
<p>12425.18. The relevant agencies are monitoring the development at Trinity Close with a view to addressing any issues where they have arisen.</p>						
<p><u>Democracy (Duty to Cooperate)</u></p>						
<p>The duty to cooperate has not been fully discharged with omissions including the LEP, Utilities, Health and community groups. There was no reconciliation meeting with SNUB in the preparation of the proposed submission content, as recommended by Mr Justice Ouseley in his verbal summing up.</p>						
<p>12425.19. A statement setting out how the authorities have complied with the Duty to Co-operate was published alongside the proposed submission documents. Local community groups are not included specifically under the Duty to Co-operate, rather they are engaged through normal consultation processes. The LEP are represented on the GNDP Board. Utilities providers, including EDF Energy (now UK Power Networks) and Anglian Water, and Health were engaged during the original development of the strategy and have been asked for their views on the Proposed Submission Content. In addition, these bodies are engaged in the Norfolk Strategic Services Group, where the remittal was discussed. Anglian Water has confirmed that the Habitat Regulations Assessment remains up-to-date for the</p>						

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<p>purposes of the proposed submission content. The work in relation to consultation is considered to be compliant with the requirements of the regulations and the High Court judgement.</p>						
<p>This proposal contravenes the principles defined in the Aarhus Convention, which establishes a number of rights for the public none of which have been upheld in this proposal. There has been no regard to democratic decisions made by local residents, the petition of objection submitted, or any acknowledgement of the wide reaching campaign organised by CPRE.</p>						
<p>12425.20. The proposed submission content is the culmination of extensive consultation and engagement dating back to 2007. The consultation processes which were undertaken were consistent with the Councils' adopted Statements of Community Involvement and the requirements of legislation. This is detailed in the Statement of Compliance with the Statements of Community Involvement, which was published alongside the original JCS and the Proposed Submission Content. The process of publication which was undertaken in regards to the Proposed Submission Content directly follows the requirements of the High Court Order. Explanatory materials, including a non-technical summary to the Sustainability Appraisal, were provided as part of the publication of the proposed submission document in order to make an inherently complex process resulting from a legal challenge and consequent High Court Order as clear as possible. SNUB spoke at Broadland's Council meeting which determined whether or not to publish the Proposed Submission Content.</p>						
<p>12425.21. Decisions to publish, submit and adopt the JCS will be made by locally elected councillors. Representations that have been made by the public and other stakeholders have been taken into account in development of the strategy and will be made available to councillors to help inform these decisions. In this way the views of the public have and will be taken account of.</p>						
<p>From 2006 until Dec 2011 all GNDP meetings were behind closed doors.</p>						
<p>12425.22. The GNDP Board is not a decision making body. It makes recommendations to Broadland District Council, Norwich City Council and South Norfolk Council concerning the JCS. Each district council's meetings have been held in public throughout the JCS process, with committee papers available publicly as normal. The GNDP Board has held meetings in public throughout the preparation of the revised SA, and publication of the PSC.</p>						

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<p>A number of EU Procurement processes have been contravened. Specific reference is made to the Rackheath Programme of Development, State Aid and Public Services (Social Value) Act 2012.</p>						
<p>12425.23. Whilst important these comments do not specifically relate to the proposed submission content. Therefore a response has not been provided here. A response to these points will be made separately.</p>						
<p><u>Health and Social Care</u></p>						
<p>No reference is made to the proposed Health and Wellbeing Boards. The strategy does not take into consideration the changes announced in the Health and Social Care Act 2010, which changes the landscape of health and social care provision. There is no evidence that the local health system will be able to manage an expansion in population as proposed in these submissions, given the stresses already been experienced by the Norfolk and Norwich University Hospital, no firm plans for investment in community care, already over-stretched mental health services, poor response times for ambulance services, no capacity in terms of dental services, and the lack of provision for out-of-hours GP services for any large-scale new development.</p>						
<p>12425.24. NHS Norfolk has been involved in the JCS process throughout its development and has not objected to the pre-submission document. In addition, NHS Norfolk are engaged in the Norfolk Strategic Services Group, where the remittal was discussed. The strategy provides policies to require necessary infrastructure to be provided to support growth. Infrastructure needs are set out in Appendix 7 of the adopted JCS and expanded and kept up to date in the Local Infrastructure Plan and Programme.</p>						
<p><u>Justification</u></p>						
<p>Justifications for these proposals in additional housing, employment opportunities and population increase are based on figures from previous and now outdated Government strategies that do not reflect housing need but are instead about a planned population increase. The real driver behind the strategy is the need for New Homes Bonus, Business Rates, increased Council Tax revenue and Community Infrastructure Levy to support Council services. The intention of Government in the proposed revocation of the Regional Spatial Strategies is to remove top-down housing targets and allow local determination.</p>						

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<p>There are many homes which already have planning permission within the Greater Norwich Area. The number of empty homes recorded in official figures hides homes which are empty but scheduled for demolition, a proportion of these homes lie within the Growth Triangle. There needs to be better management of Affordable Housing to allow for upsizing and downsizing. Delivery of affordable housing could be compromised by current Government initiatives. Insufficient regard has been given to the needs of the ageing population of the area, including the need for retirement homes and housing with care.</p> <p>12425.25. The level of housing and job provision was not remitted by Ouseley LJ. It remains part of the adopted Joint Core Strategy and is not included in the proposed submission text. As part of the SA/SEA process, the evidence for the level of housing requirement has been locally reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document “Topic Paper Homes and Housing August 2012” supported the publication of the proposed submission and has been further updated post publication to take into account additional information to support submission. The paper demonstrates that the housing provision in the JCS remains valid. Regional Spatial Strategy are, at the time of writing, still in place and the JCS should be in conformity with it. Notwithstanding this requirement the housing targets have been considered and determined locally, the evidence for which is set out in the Topic Paper: Homes and Housing.</p> <p>12425.26. The housing numbers planned for through the JCS are considered to be consistent with the objectively assessed needs, the evidence for which is set out in the updated “Topic Paper: Homes and Housing” and is in accordance with Governments clear requirement to deal with housing need and significantly boost the supply of homes. There is therefore clear and compelling evidence that the housing figures are derived from evidence of the need for new housing rather than the financial motivation suggested. The level of housing need, which informed the housing targets of the JCS, discounted the number of existing planning permissions within the area. It is considered to be extremely unlikely that there are significant numbers of empty homes scheduled for demolition in the area. Potentially better management of housing stock does not alter the overall need for a significant increase in the number of housing units.</p> <p>12425.27. With regards to the ageing population, this is actually one of the drivers of overall housing need. In addition, Policy 4 of the adopted JCS sets out requirements for an appropriate mix of housing, including housing with care. Whilst Policy 7 identifies the need for care home provision, including dementia care. The Proposed Submission Content includes a specific reference to such provision being delivered within the Growth Triangle.</p>						

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<p>Major employment opportunities identified in the JCS are to the south west and south of Norwich with no announcements of major employment opportunities in the NEGТ. Any funds should therefore be allocated to the upgrading the A11, A47 and A140 to help link with the New Anglia Enterprise Zone at Gt Yarmouth and Lowestoft. Population figures do not suggest that Broadland is, or is likely to be, an area of substantial population growth. There is no natural predilection for overseas nationals to come and live and work in Broadland. The only viable alternative to ensure adequate population to occupy the planned level of development is to encourage mass inward migration.</p>						
<p>12425.28. The growth triangle is well related to significant job opportunities in the city centre, at Broadland Business Park and the Airport. Local employment opportunities are provided at Rackheath Industrial area and on the Salhouse Road.</p>						
<p>12425.29. Completion of A11 dualling is scheduled for 2014. The JCS includes a Long Stratton by-pass. The A47 is the responsibility of the Highways Agency, but the County Council considers improvements to the A47 to be very important for economic growth. The need for infrastructure improvements elsewhere is not regarded as a valid reason for not meeting the need for growth in the Greater Norwich area. The Local Investment Programme and Plan, available on the GNDP website identifies the major infrastructure required to support planned levels of growth.</p>						
<p><u>Food Chain and Agriculture</u></p>						
<p>The East of England is well known for agricultural production with 58% of the UK's Grade 1 and 2 soils. It is not sound to take current productive agricultural land out of the UK food chain when the drive from central government is to secure the food chain within the British Isles.</p>						
<p>This has been recognised by Norfolk County Council in their flawed reasoning to purchase the RAF Coltishall site to return the land to agriculture. Better to leave the land in the NEGТ as it is then.</p>						
<p>12425.30. In order to meet housing need, development of agricultural land is necessary. The strategy largely avoids development of high grade agricultural land. Avoiding development of agricultural land in this area is unsustainable because it would not meet social and economic needs or would involve building on Greenfield land not in agricultural use which would compromise environmental</p>						

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<p>considerations.</p>						
<p><u>Infrastructure</u></p>						
<p>Proposal is unsound due to its over reliance on the Norwich Distributor Road, the Postwick Hub enhancements and an over reliance on public transport. The NDR does not meet the A47 and will actually only be a ½ link, leading to likely reduced support from communities to west. Development at Broadland Business Park can be accommodated by inner orbital link from Postwick to A1151. There has been a delay to the Postwick Side Roads Order Inquiry and there have been alternative junction schemes put forward that would support an alternative distribution of growth.</p>						
<p>12425.31. The Joint Core Strategy and this resubmission of the remitted parts have had regard to the plans and programmes of other Authorities. The NDR is a major scheme promoted by Norfolk County Council and is an important consideration in the determination of the growth strategy promoted. When the JCS was examined in November 2010 the relationship between growth and the NDR was fully debated. To allow for the degree of uncertainty that surrounded funding and delivery of the NDR at that time a Contingency section (Paragraphs 7.11 to 7.18) was added to the strategy and adopted.</p>						
<p>12425.32. Whilst the NEGOT was remitted, the NDR was not. Since the JCS examination in November 2010, the NDR has been given programme entry status and government have awarded funding of £89m to the scheme from the A47 to the A140. Norfolk County Council are committed to the delivery of the full NDR from the A47 to the A1067 as set out in the JCS and have stated publicly that they will underwrite the additional cost associated.</p>						
<p>12425.33. It is acknowledges that there is a delay to the slip roads order inquiry for Postwick Hub. However, the scheme has been granted planning permission, has funding and remains the only junction scheme which has been agreed by the Highway Agency. Of course, there are still statutory processes to be gone through for the NDR, including planning permission, however the funding situation is far more certain and since the adoption of the JCS the certainty of delivery of the NDR has significantly increased. The contingency strategy remains and sets out a robust strategy for dealing with delay or non delivery of the JCS.</p>						
<p>There are questions over the feasibility of trains serving Rackheath without new carriages which would not be feasible due to</p>						

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<p>restrictions of existing stations. Possibility of passenger trains to Dereham on MNR has not been taken into account. BRT will not be similar to Cambridgeshire Busway or other forms of rapid transit using trams. Furthermore, cuts in subsidies will mean that local authorities are unable to achieve the behavioural change necessary for the wholesale use of public transport.</p>						
<p>12425.34. Growth across Norwich is dependent on the implementation of the NATS strategy to manage travel demand. A key element of NATS is the NDR which will prevent unnecessary through trips and provide the capacity for the introduction of measures to support buses, walking and cycling. Without the introduction of the NDR and NATS the local impact of large scale growth in the north east would be unacceptable. Even with NATS and the NDR in place, an additional transport link connecting Broadland Business Park to Norwich International Airport via new growth areas will be required to provide local access and afford the opportunity to deliver fast and direct public transport and cycling facilities. This link in itself does not replace the need for the NDR.</p>						
<p>12425.35. Delivery of the strategy is not dependent on investment in rail infrastructure. However the existence of the railway line affords additional travel choice opportunities. There is currently no passenger service to Dereham, the only advantage to the GNDP area could be a marginal increase in public transport accessibility to Wymondham. Wymondham is already recognised as having good accessibility.</p>						
<p>12425.36. BRT is at the heart of the NATS strategy. It is not simply about providing “bus lanes”, although bus prioritisation is an important element, but is a whole package of measures including off bus ticketing, improved waiting facilities and high specification vehicles. The implementation of the NDR will help to enable improvements within the city centre to bus priority.</p>						
<p><u>Planning</u></p>						
<p>Ideals espoused in the Localism Act and within the NPPF are not being achieved as local residents, parish councils and community groups are being ignored.</p>						
<p>12425.37. All decisions to publish, submit and adopt the JCS are made by locally elected councillors. Representations that have been made by the public and other stakeholders have been taken into account in development of the strategy and will be made available to councillors to help inform these decisions. In this way the views of the public have and will be taken into account.</p>						

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<p>SNUB believes that discussions are still ongoing in regards to the “Norfolk Hub” proposals and that it is intended that this will be the source of employment for the 10,000 homes proposed within the Growth Triangle.</p>						
<p>12425.38. The “Norfolk Hub” plays no part in either adopted JCS or the Proposed Submission Content. The Growth Triangle is well served by existing and proposed employment growth at Broadland Business Park, Rackheath Industrial Estate, Norwich International Airport and related employment and the City Centre. The “Norfolk Hub” proposals were put forward to Broadland’s Site Allocations process but did not form part of the “Shortlisted Sites” or “Alternative Sites” consultation.</p>						
<p>Impact on A1151 through Wroxham and Salhouse Conservation Area and its potential extension not adequately taken into account.</p>						
<p>12425.39. The proposed submission documentation supports significant planned growth to the north east of Norwich. The location is favourable for growth as it provides for the opportunity for an urban extension close to existing strategic employment areas at Broadland Business Park and adjacent to Norwich International Airport. The NE is linked to Norwich by a number of radial routes including the A1151 and will directly benefit from the construction of the Northern Distributor Route. These routes provide the opportunity to deliver high quality public transport, walking, cycling and vehicular connections.</p>						
<p>12425.40. The focus of the growth is Norwich and the scale is such that the new development will include most of the day to day facilities and services required including healthcare, primary and secondary education, food shops green infrastructure and community facilities. Consequently growth in this location will not directly pressure the A1151.</p>						
<p>12425.41. There will inevitably be some out commuting but the likely increases in these trips will be associated with development of new employment opportunities north of the River Bure.</p>						
<p>12425.42. A potential source of increase would be related to leisure trips to the Broads and the North Norfolk Coast. Increases in visitor pressure on these sensitive sites have been considered in the Habitats Regulation Assessment (HRA). The HRA considers mitigation measures including management of visitor numbers and the provision of appropriate green infrastructure within the Growth Triangle.</p>						

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12425.43.	Overall the growth in the NEG T is not predicted to have a significant impact on the A1151 through Wroxham.					
12425.44.	The Salhouse Conservation Area, and any extension to it, will be taken into account when considering the form new development takes but its existence is not considered to preclude development.					
The Beyond Green Proposals presuppose either Alternative 1 or Alternative 2 and therefore shows a staggering disregard for public opinion						
12425.45.	Developers are entitled to submit planning applications. As set out in the NPPF, in the absence of an up-to-date strategy, the local planning authority will be required to determine such applications in accordance with the presumption in favour of sustainable development. Notwithstanding the above, in this case Beyond Green has requested that determination does not proceed ahead of the adoption of the JCS.					
<u>Alternatives</u>						
Alternatives put forward by such eminent bodies as the Norwich Society (single satellite conurbation to the south/south-west of city), CPRE and Norfolk Association of Architects (Acle Hub) as well as suggestions such as the relocation of Norwich International Airport, development along the Drayton Road or dispersal. We do not believe that these alternatives have been seen as reasonable alternatives and subjected to an appropriate SEA or consultation.						
12425.46.	In accordance with Article 5(1) of the SEA directive, the identification of Reasonable Alternatives was limited to the geographical extent of the plan. In this instance, that geographical area was the Norwich Policy Area. An evaluation of the capacity of Norwich and South Norfolk to accommodate further dispersed growth was undertaken as was an evaluation of the capacity of all of the different sectors of the NPA to accommodate additional development was undertaken.					
12425.47.	This evaluation identified that only three reasonable alternatives existed, which met the objectives of the plan. A separate					

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<p>response has been prepared which addresses the comments of the NAA (Ref: 12418) and CPRE (Ref: 12376). Comments about an alternative relating to the relocation of Norwich International Airport have been provided in the response to Salhouse Parish Council (Ref: 12409). The development of Norwich golf course and Hellesdon Hospital does not constitute an alternative in isolation as they would fail to meet the objectives of the plan in terms of delivery of housing in accordance with the adopted policies of the JCS. These sites may however be suitable to accommodate part of the “small sites allowance” for the Broadland part of the NPA which is proposed in the draft plan.</p>						
<p><u>Localism</u></p>						
<p>The plan is unsound as it does not fully deliver on the promises laid out by government in the Localism Act, namely: Community Rights, Neighbourhood Planning, Housing, General Power of Competence: and, Empowering cities and other local areas. The view of SNUB is that their followers have very little rights and powers, are unable to improve local services and save important local facilities. Housing decisions are being taken by unelected local government Quango in the form of the GNDP, who until recently held meetings in private with no public accessibility.</p>						
<p>12425.48. The NPPF, published after the Localism Act was brought into force, is considered to be Government’s expression of how Localism should be applied in a planning context. The Proposed Submission Content is considered to be in accordance with the NPPF, as evidenced by the Statement of Compliance with the National Planning Policy Framework, which was published alongside the proposed submission documents. The GNDP, as an informal, non decision-making body, is considered to have a role in supporting close co-operation between the partners in accordance with Government’s clear requirement for co-operation across districts. As has already been stated, the GNDP Board is not a decision making body. It makes recommendations to Broadland District Council, Norwich City Council and South Norfolk Council concerning the JCS. Each district council’s meetings have been held in public throughout the JCS process, with committee papers available publicly as normal. The GNDP Board has held meetings in public throughout the preparation of the revised SA, and publication of the PSC.</p>						
<p>SNUB raise concerns about the “loss” of public responses to the 2008 JCS consultation. They consider that the summarisation of comments in 2008 had led to some comments being misrepresented. Whilst SNUB accepts that this was corrected for respondents who complained they believe there may remain inaccuracies for any respondents who did not. As a consequence,</p>						

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<p>SNUB considers that the Statement of Consultation should be considered invalid.</p>						
<p>12425.49. It is not clear which representations SNUB consider to have been lost. Officers make every effort to ensure that any summaries accurately reflect the concerns of the respondent. To avoid any misconceptions, where hard copy representations were submitted during the Regulation 25 public consultation, and subsequently, the original text was made available with any summary. The validity of the consultation undertaken in the preparation of the JCS, as set out in the Statement of Consultation, was fully considered as part of the Independent Examination in 2010. The original text of any representations made in respect of the publication of the Proposed Submission Content will be made available alongside any summary to ensure accuracy.</p>						
<p><u>Conflicts</u></p>						
<p>A number of conflicts of interest that have not been properly declared and that there is a possibility of unlawful activity as defined in the Bribery Act 2010.</p>						
<p>12425.50. The matters raised are considered to be outside the scope of the proposed submission publication. However, clearly these issues are a matter of importance and will be responded to separately.</p>						
<p><u>Air Safety</u></p>						
<p>The NEGTL lies under the flight path to Norwich Airport. Implications for construction (eg. Cranes) and beyond. No evidence of the necessary airport-safeguarding map as required by the ODM Circular 01/2003.</p>						
<p>12425.51. Broadland District Council maintains a copy of the Aerodrome Safeguarding Map for Norwich Airport. This map shows different zones where consultation should be undertaken with Norwich Airport in regard to different types of development. Norwich International Airport has been involved in the development of the Joint Core Strategy and was notified of the publication of the proposed submission content. They have chosen not to respond or raise any objection in relation to the proposals.</p>						
<p><u>Politics</u></p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>These proposals are overtly political and not designed to meet housing need but rather to satisfy local and regional political agendas. Concerns are raised about the local political process and decision making. A specific concern is raised about the scheduling of the EIP for March 2013 to avoid County Council Purdah. Concerns were also raised that a bid for Government's City Deals initiative was being taken forward without appropriate democratic representation.</p>						
<p>12425.52. Paragraph 47 of the National Planning Policy Framework requires local planning authorities to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing. In paragraph 182 this is expanded to qualify that this should include unmet requirements from neighbouring authorities. As part of the SA/SEA process, the evidence for the level of housing requirement was objectively reviewed and the Topic Paper supporting the adopted JCS updated to take account of any changes in background data. This document "Topic Paper Homes and Housing August 2012" supported the publication of the proposed submission and demonstrates that the housing provision in the JCS remains consistent with National Planning Requirements.</p>						
<p>12425.53. No alternative evidence of need and demand has been put forward within this, or any other representation that demonstrates that the housing figures within the JCS are not consistent with the full, objectively assessed needs for market and affordable housing.</p>						
<p>12425.54. Local decisions are taken in accordance with standing orders and legislation. Decisions to submit the JCS Submission Content is taken at Full Council meetings, allowing full and cross party debate and representation. The timetable for examination is indicative and cannot be scheduled until it is agreed by the Planning Inspectorate.</p>						
<p>12425.55. The expression of interest registered in the City Deals Initiative was undertaken under the banner of the GNDP. However, as has been stated elsewhere, the GNDP is an informal, non decision-making, body and its role being to support close co-operation between the relevant local authority partners. In this instance the bid was the expression of the will of the three Councils working in cooperation with the New Anglia LEP.</p>						
<p>Further concerns are raised about the Secretary of State allowing applications for planning permission to be made directly to the Planning Inspectorate and measures for the Secretary of State to renegotiate S.106 agreements.</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
12425.56.				Clearly such changes lie outside the direct control of the GNDP authorities. The adoption of the proposed submission content of the JCS, and subsequent site allocations and determination of planning applications, is an important step in the process of planning to help ensure that decisions about the future of the authorities lies in the hands of locally elected members.		
<u>Economics</u>						
The proposed submission content takes no account of proposed changes to the financing of housing supply.						
12425.57.				Changes to the financing of houses have no direct impact on the requirement of the local plan to address housing need. Any changes are expected to be brought in to aid delivery, and will thereby support the deliverability of the strategy.		
Overall benefit of CIL will be limited as some of it will be used to fund projects elsewhere in GNDP area such as Long Stratton by-pass.						
12425.58.				One of the key benefits of CIL is that it can be used more flexibly than direct S106 payments, meaning that critical infrastructure constraints can be prioritised with less important issues being dealt with at later, but appropriate times. Infrastructure needs are set out in Appendix 7 of the adopted JCS and expanded and kept up to date in the Local Infrastructure Plan and Programme.		
Dependence on New Homes Bonus with no contingency plan for Council finances if homes are not built.						
12425.59.				Refer to the comments above i.e. that the housing numbers are defined on the basis of objectively assessed need. The future finances of the Council are not a specific consideration for the adopted JCS or in relation to the soundness of the proposed submission content. Nonetheless the concerns about future financing are noted.		
Affordable housing is undeliverable at 33% unless house values rise by 7%; the best RICS forecast is 2.5%. Therefore the strategy will not be able to deliver the amount of affordable housing it states is required.						
12425.60.				The evidence which is referred to relates to a small section of the evidence on CIL viability. It comes from one of several		

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<p>scenarios designed to demonstrate the impact of CIL on the viability of development, taking account of a wide range of different assumptions. The viability of affordable housing was tested at the original JCS examination. Adopted Joint Core Strategy Policy 4: Housing sets out the requirements for affordable housing on new developments. This includes a mechanism to accept reduced percentages of affordable housing where it can be demonstrated that it makes development unviable. This policy is the results of adjustment made by the EIP inspectors in respect of concerns about viability. While the Policies of the JCS are intended to maximise delivery of affordable housing, it is accepted, as explained within the Topic Paper: Homes and Housing, that meeting the full need for affordable housing would require significant increases in the number of market homes beyond established JCS levels. Notwithstanding the above, the specific policy on housing does not form part of the proposed submission content.</p>						
<p><u>Education and Qualifications</u></p>						
<p>Current falling standards of education and adult qualifications will be exacerbated by the expected increase in population in these proposals, particularly due to overcrowding of schools.</p>						
<p>12425.61. The strategy provides for necessary infrastructure. Concentrated growth in the north east provides the best opportunity to support and deliver new infrastructure. Infrastructure needs are set out in Appendix 7 of the adopted JCS and expanded and kept up to date in the Local Infrastructure Plan and Programme. The identified infrastructure needs include primary and secondary education. Alternatives which would result in schools being overwhelmed were discounted as being unreasonable.</p>						
<p><u>Tourism</u></p>						
<p>Negative impact on growth in the tourism sector, and thereby the local economy, caused by increased traffic on the A1151, which will put off tourists who will have to queue for longer periods, and direct and indirect impacts on the Broads and surrounding areas due to the demonstrated adverse impacts on the Broads caused by both Options 1 and 2.</p>						
<p>12425.62. The focus of the growth is Norwich and the scale is such that the new development will include most of the day to day facilities and services required including healthcare, primary and secondary education, food shops green infrastructure and community facilities. Consequently growth in this location will not directly pressure the A1151.</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
12425.63.						There will inevitably be some out commuting but the likely increases in these trips will be associated with development of new employment opportunities north of the River Bure.
12425.64.						A potential source of increase would be related to leisure trips to the Broads and the North Norfolk Coast. Increases in visitor pressure on these sensitive sites have been considered in the Habitats Regulation Assessment (HRA). In addition, there are identified potential impacts related to substantial development north of Rackheath. The Habitat Regulations Assessment produced to support the JCS identified the appropriate mitigation for both of these impacts: a buffer zone north of Rackheath; and the implementation of the green infrastructure plan. The delivery of these mitigation measures is provided for in the JCS.
12425.65.						Overall the growth in the NEG T is not predicted to have a significant impact on the A1151 through Wroxham and suitable mitigation is put in place for any potential direct or indirect impacts associated with the plan, as set out within the HRA.
						In relation to plans for RAF Coltishall, SNUB considers there to be no sense in bringing agricultural land back into use in Coltishall whilst losing existing agricultural land to housing elsewhere, Rackheath.
12425.66.						Norfolk County Council's plans for the former airfield at Coltishall do not have any bearing on the proposed submission content. It is considered that evidence shows a clear and compelling need for growth in the Norwich area, and the limits of brownfield opportunities. Thereby Greenfield land in agricultural use is needed for development within the Norwich area. Coltishall cannot reasonably be considered to be suitable to accommodate development needed within the Norwich Policy Area.
						<u>Proposed changes</u>
						Broadland District Council should have the courage, as did Rochdale Borough Council (among others) to withdraw its participation in the Joint Core Strategy.
						In the Rochdale example the authority determined to withdraw their core strategy submission on the basis of the recommendation of an independent planning inspector ahead of their Examination in Public. No similar recommendation has been received in regards to the

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<p>proposed submission content of the Joint Core Strategy. Whilst the High Court Order found failings within the Sustainability Appraisal prepared in support of the Joint Core Strategy, this is a legal compliance issues and is separate to the consideration of the planning merits of the strategy. The planning merits of the Joint Core Strategy proposed submission content will be considered by an Independent Inspector at a forthcoming EiP, should the three authorities determine to submit the proposed submission content. It is noteworthy that at the previous EiP, which considered the planning merits of the Joint Core Strategy, the Planning Inspectors found the strategy “sound”, subject to some limited minor amendments.</p>						
12426	SCC Norwich LLP and Thorpe & Felthorpe Trust	D			Strong Support for boundary of the Growth Triangle and inclusion of Racecourse Plantation within the Boundary.	Support for the Boundary of the Growth Triangle and inclusion of Racecourse Plantation within that Boundary Noted.
<p>Detailed Officer Response: The respondent puts forward a number of arguments which they feel supports the principle of development within the boundary of Racecourse Plantation. The proposed submission content is location specific but not site specific. The consideration of site specific issues, including which sites within the proposed Growth Triangle are most suitable for development will be considered through an Area Action Plan. It is not considered that a strategic document such as the Joint Core Strategy, and consequently the proposed submission content is the appropriate document through which to consider site specific issues.</p>						
12427	SCC Norwich LLP and Thorpe & Felthorpe Trust	D	Support & Object	Object to the wording related to the smaller sites allowance.	Support the identification of the Growth Triangle and small sites allowance. However, object to the wording of the bullet in policy 9. Specifically that the small sites allowance should be delivered through sites both within and	The identification of a small sites allowance was intended to provide for development outside the Growth Triangle. Allowing a substantial amount of the small

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
					outside the Growth Triangle.	sites allowance to be delivered within the Growth Triangle would undermine the rationale for the allowance itself.
<p>Detailed Officer Response: The purpose of the “small sites allowance” within the NPA was to provide flexibility in housing delivery and allow for some small scale development outside major growth locations. The rationale behind this decision is set out in section 4.5 & 4.6 of the Sustainability Appraisal report and in Appendix G & H of the technical annex to the report. Allowing for any substantial amount of the small sites allowance to be brought forward within an area of major growth would undermine the rationale behind this policy and is therefore considered unsound. It is noted that the proposed change promoted by the respondent is not supported by any form of Sustainability Appraisal which provides evidence of the impact of their proposed change.</p>						
12428	SCC Norwich LLP and Thorpe & Felthorpe Trust	D	Support & Object	Object to policy 10 on the basis of soundness. The policy is not consistent with paragraphs 154 & 173 of the NPPF or the presumption in favour of sustainable development.	<p>Object to policy 10 on the basis that it does not provide sufficient certainty that the number of homes promoted within the policy will be delivered within the plan period.</p> <p>Also, that the wording in bullet points 5 & 6 indicate that all consideration are of equal weighting.</p> <p>This is not consistent with paragraphs 154 & 173 of the NPPF or the presumption in favour of sustainable development.</p>	The proposed changes to policy wording is considered unnecessary as they do not increase the potential for delivery or provide necessary clarification about how different levels of environmental designation should be treated.

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
					Suggests amended text to policy 10.	
<p>Detailed Officer Response: Proposed policy 10 does not restrict components of the villages or urban quarters coming forward in an independent manner. It does require a co-ordinated approach. This is the intention of the proposed policy. Therefore the proposed text changes are considered unnecessary.</p> <p>The elements of policy 10 that are within the proposed submission content should not be read independently of the remainder of the JCS. Policy 1 clearly sets out the way in which sites with different levels of designation will be treated. Therefore there is not considered to be any need to change the wording of the policy.</p> <p>The respondent's objection to the deliverability of the development levels within the area is inconsistent with their previous submission that additional development, from the small sites allowance, should be accommodated within the Growth Triangle.</p>						
12429	Mr K Jackman	I			As per Wroxham Residents Petition	See response to petition from Wroxham Residents
12430	Henry B Caswell	I			As per Wroxham Residents Petition and Wroxham Needs a Bypass	See response to petition from Wroxham Residents
12431	Eostre Caswell	I			As per Wroxham Residents Petition and Wroxham Needs a Bypass	See response to petition from Wroxham Residents
12432	C Jimenez	I			As per Wroxham Residents Petition	See response to petition from Wroxham Residents
12433	Lorraine Richens	I			As per Wroxham Residents Petition	See response to petition from Wroxham

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
						Residents
12434	Petition from Wroxham residents	I/PC	O		Soundness objection that in considering alternatives for growth, the strategy has failed to take effects on communities and road traffic in the vicinity, specifically in Wroxham.	Objection noted.

Detailed Officer Response:

The proposed submission documentation supports significant planned growth to the north east of Norwich. The location is favourable for growth as it provides the opportunity for an urban extension close to existing strategic employment areas at Broadland Business Park and adjacent to Norwich International Airport. The NE is linked to Norwich by a number of radial routes including the A1151 and will directly benefit from the construction of the Northern Distributor Route. These routes provide the opportunity to deliver high quality public transport, walking, cycling and vehicular connections.

The focus of the growth is Norwich and the scale is such that the new development will include most of the day to day facilities and services required including healthcare, primary and secondary education, food shops green infrastructure and community facilities. Consequently growth in this location will not directly pressure the A1151.

There will inevitably be some out commuting but the likely increases in these trips will be associated with development of new employment opportunities north of the River Bure.

A potential source of increase would be related to leisure trips to the Broads and the North Norfolk Coast. Increases in visitor pressure on these sensitive sites have been considered in the Habitats Regulation Assessment (HRA). The HRA considers mitigation measures including management of visitor numbers and the provision of appropriate green infrastructure within the Growth Triangle.

Overall the growth in the NEGTT is not predicted to have a significant impact on the A1151 through Wroxham and a bypass is not a requirement of the scale and distribution of growth promoted in the JCS.

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
12435	English Heritage	G	No Comment	n/a	No comment	Noted
12436	Steve Horrocks	I	Object		<p>1) Not convinced the Growth Triangle requires the NDR, funds should be put into bus / train services, community-based infrastructure and access to local employment opportunities</p> <p>2) Do not agree with 2008 decision to reduce Norwich allocations from 4000 to 3000 whilst increasing SN rural area allocation by 40%</p> <p>3) Insufficient scrutiny of some elements of the JCS, including the Settlement Hierarchy where the decision to relax the criteria for service villages to allow villages without 4 essential services being present resulted in a significant rise in the number of service villages. Villages without all 4 essential services should have smaller allocations</p>	<p>1) Objection noted. Strategy provides for necessary infrastructure and requires sustainability measures and mixed communities in new housing.</p> <p>2) The Norwich and South Norfolk allocations are set out in the adopted JCS and are not a matter for further consideration in this consultation.</p> <p>3 & 4) The Settlement Hierarchy is as set out in the adopted JCS and is not a matter for further consideration in this consultation.</p> <p>5) Policies relating to the development of schools or preventing development on land</p>

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
					<p>4) Neighbouring service villages where neither has all 4 essential services should cluster with sites at the common boundary with JCS policy that encourages SNC to offset use of agricultural land with brownfield sites</p> <p>5) Where any primary school is below national guidelines they should be expanded wherever possible with JCS policy to prevent landlocking of school sites</p>	adjacent to schools are not the subject of this consultation
<p>Detailed officer response</p> <p>1) Growth across Norwich is dependent on the implementation of the NATS strategy to manage travel demand. A key element of NATS is the NDR which will prevent unnecessary through trips and provide the capacity for the introduction of measures to support buses, walking and cycling. Without the introduction of the NDR and NATS the local impact of large scale growth in the north east would be unacceptable. The JCS also provides for potential improvement to rail services, including the potential for a new station to serve the Growth Triangle.</p> <p>2) The final numbers for the distribution of housing across the district were found sound by an independent Planning Inspector. The legal challenge relates to the distribution of the housing numbers in the NPA. Therefore the level of housing in the rural area of South Norfolk is not the subject of this consultation.</p> <p>3) The settlement hierarchy has been found sound and was not part of the subject to the legal challenge and therefore is not the subject of this consultation.</p> <p>4) See response to (3)</p> <p>5) The legal challenge related to the distribution of housing numbers in the NPA. Policies relating to the development of schools or preventing development on land adjacent to schools are not therefore the subject of this consultation.</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
12437	Hoveton Parish Council	PC	Object		<p>The Proposed Submission Documents are too large and complex to be easily understood.</p> <p>Wroxham should not have been designated as a key service centre in the JCS.</p> <p>Existing Services and Facilities in Hoveton will be put under significant additional pressure by new growth.</p> <p>Norfolk County Council Traffic Surveys significantly underestimate the actual level of traffic and further development south of Wroxham will inevitably increase traffic, add to congestion, reduce pedestrian safety and degrade air quality.</p> <p>The NDR will make the traffic problems in Wroxham worse.</p>	<p>Objections noted</p> <p>See detailed officer response below:</p>
Detailed Officer Comments						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>Complexity & Size of Proposed Submission Documents</p> <p>The process which was undertaken directly follows the requirements of the High Court Order, which is considered to have been complied with. Explanatory materials, including a non-technical summary to the Sustainability Appraisal, were provided as part of the publication of the proposed submission document in order to make an inherently complex process resulting from a legal challenge and consequent high court order as clear as possible.</p> <p>Wroxham as a Key Service Centre</p> <p>Wroxham's designation as a Key Service Centre lies outside the scope of this consultation, the geographical scope of which extends only to the boundary of the Norwich Policy area. Notwithstanding the above, Hoveton Parish Council's concerns about pressure on services and facilities is noted.</p> <p>Traffic Impact on the A1151</p> <p>The proposed submission documentation supports significant planned growth to the north east of Norwich. The location is favourable for growth as it provides for the opportunity for an urban extension close to existing strategic employment areas at Broadland Business Park and adjacent to Norwich International Airport. The NE is linked to Norwich by a number of radial routes including the A1151 and will directly benefit from the construction of the Northern Distributor Route. These routes provide the opportunity to deliver high quality public transport, walking, cycling and vehicular connections.</p> <p>The focus of the growth is Norwich and the scale is such that the new development will include most of the day to day facilities and services required including healthcare, primary and secondary education, food shops green infrastructure and community facilities. Consequently growth in this location will not directly pressure the A1151.</p> <p>There will inevitably be some out commuting but the likely increases in these trips will be associated with development of new employment opportunities north of the River Bure.</p>						

Ref:	Name	Type	Support / Object	Significant issues raised	Officer Summary	Comment
<p>A potential source of increase would be related to leisure trips to the Broads and the North Norfolk Coast. Increases in visitor pressure on these sensitive sites have been considered in the Habitats Regulation Assessment (HRA). The HRA considers mitigation measures including management of visitor numbers and the provision of appropriate green infrastructure within the Growth Triangle.</p> <p>Overall the growth in the NEGT is not predicted to have a significant impact on the A1151 through Wroxham.</p>						