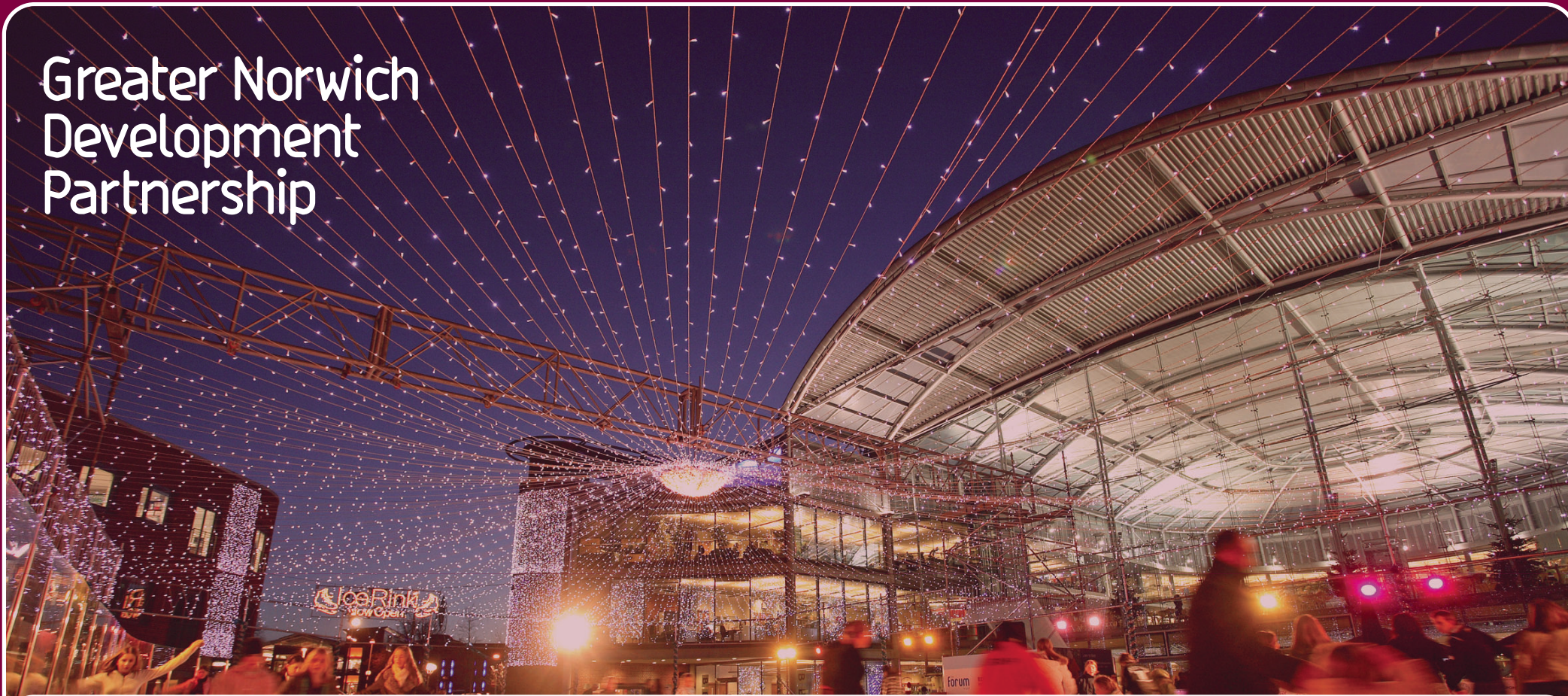


Greater Norwich Development Partnership



Soundness Self Assessment

Joint Core Strategy for Broadland, Norwich and South Norfolk

16 September 2009

Jobs, homes, prosperity for local people



Local Development Framework Soundness Self Assessment Statement

Introduction

Throughout the production of the Joint Core Strategy (JCS), the Greater Norwich Development Partnership has used the 'Soundness Toolkit' produced by the Planning Advisory Service (PAS) to help ensure that evidence requirements are met and that we fully comply with statutory requirements. The toolkit reflects the revised Planning Policy Statement 12, the Plan Making Manual and Local Development Framework Regulations (and the Amendment) and is made up of two components, the first of which concerns the legal compliance aspects and the second of which focuses on the test of soundness.

This document is currently work in progress and as such there are several sections that remain to be completed. As the Joint Core Strategy progresses through to the examination

stage this toolkit will continually be updated and amended. It currently shows progress up to 16 September 2009.

On submission of the Joint Core Strategy, a short statement will be produced which summarises the findings from the toolkits and clarifies whether the JCS satisfies the requirements and is 'sound'. This statement along with the toolkits will be sent to the Planning Inspectorate on submission.

Please note that the legal compliance toolkit in Appendix 1 has been compiled for each stage of development of the Joint Core Strategy and therefore the comments made and evidence provided will be relevant to the particular stage reached (and may be updated in later stages of the document).

Activity	Evidence provided
<p>1. Is the development plan document identified in the adopted local development scheme and have you recorded the timetable for its production?</p>	<p>Each of the three authorities included a Core Strategy within their first Local Development Schemes (LDS) published in 2005. Agreement in December 2006 to do a Joint Core Strategy resulted in each of the three authorities revising their LDS in 2007 in order to accommodate the new timetable and purpose of the document.</p> <p>The Joint Core Strategy was recorded as commencing in January 2007 in all three of the local authorities 06/07 Annual Monitoring Reports (AMRs). Update on progress has been included in all the subsequent AMRs.</p> <p>See 2005 and 2007 LDSs for Broadland, Norwich and South Norfolk Council, 06/07 and 07/08 AMRs.</p>
<p>2. Have you considered how community engagement will be programmed into the preparation of the development plan document?</p>	<p>Each of the three authorities has a Statement of Community Involvement (SCI) which sets out the standards for consultations. These have formed the basis for the consultation process along with that set out in the amended regulations. The three authorities decided to undertake an initial consultation process (stage 1 – topic workshops) before issuing the Issues and Options document. These stakeholder workshops were held in summer 2007 with key bodies to introduce the concept of the Joint Core Strategy (JCS) and to gather information.</p> <p>The consultation periods are timetabled in the LDS.</p> <p>See SCI and LDS.</p>
<p>3. Have you considered the appropriate bodies you should consult?</p>	<p>Chapter 6 of Broadland District Council’s, Appendix 2 of Norwich City Council’s, and Appendix 3 of the South Norfolk Council’s SCI lists the statutory consultees, government departments and additional bodies who should be consulted throughout the process.</p> <p>At this inception stage the Sustainability Appraisal (SA) Scoping Report was sent to all the necessary bodies (see Q6) and a list of those that attended the workshops is given in Appendix 1 of the Issues and Options Report of Consultation.</p> <p>See SCI and Issues and Options Report of Consultation.</p>

Activity	Evidence provided
<p>4. Is baseline information being collected and evidence being gathered to keep the matters which affect the development of the area under review?</p>	<p>Appendix 2 of the Sustainability Appraisal Scoping Report (which was adopted in December 2007) sets out the baseline data that was collected. This information along with data from the Annual Monitoring Reports (which provide updated information on for example housing completions) supplements the growing evidence base behind the LDF. The evidence studies are detailed in Appendix 2 of the Joint Core Strategy proposed submission document.</p> <p>The evidence base will need to be kept up to date and as such the SA baseline information and the evidence studies may need reviewing during the process of producing the plan.</p> <p>See SA Scoping Report and studies.</p>
<p>5. Is baseline information being collected and evidence being gathered to set the framework for the sustainability appraisal?</p>	<p>The Joint Core Strategy Sustainability Appraisal Scoping Report was adopted in December 2007. It scopes relevant plans and programmes, identifies the issues that the Joint Core Strategy should address and assesses the economic, social and environmental characteristics of the area and changes in these characteristics. Appendix 2 sets out the baseline data that was collected to set the framework for the Sustainability Appraisal. It supplements the growing evidence base behind the Local Development Framework (LDF).</p> <p>See SA Scoping Report.</p>
<p>6. Have you consulted the statutory environment consultation bodies for five weeks on the scope and level of detail of the environmental information to be included in the sustainability appraisal report?</p>	<p>The Scoping Report was distributed to the three statutory bodies (Natural England, English Heritage, and the Environment Agency). In addition it was sent to 23 other bodies including neighbouring authorities and Local Strategic Partnerships (LSPs). A full list can be seen on page 68 of the Scoping Report. The document was available on the Internet for public viewing. The consultation took part between 27 July and 31 August 2007. A number of responses were received (from the three statutory consultees, the Broads Authority and Norfolk County Council), and the necessary revisions were made before the Scoping Report was adopted in December 2007. These amendments can be seen as part of the revised report and Appendix 5 of the document outlines the feedback and actions arising from the consultation. The comments were taken on board before the assessment of options and when preparing the Draft SA report.</p> <p>See Appendix 5 of the Scoping Report for comments and actions.</p>

Issues and Options, start of working up Preferred Options, Regulation 25 technical consultation

Activity	Evidence provided
<p>1. Have you notified the specific consultation bodies that have an interest in the subject of the development plan document and invited them to make representations about its contents?</p>	<p>The Issues and Options report was sent to all statutory consultees (350 in total) taken from the GNDP consultation database at the start of the consultation process.</p> <p>The Regulation 25 (Technical Consultation) document was distributed to those set out in the document entitled Technical Consultation Regulation 25 Consultees.</p> <p>As such all specific consultation bodies set out in the regulations have been invited to make representations.</p> <p>See SCI, Issues and Options consultation report, List of Technical Consultation Regulation 25 Consultees.</p>
<p>2. Have you notified the general consultation bodies that you consider have an interest in the subject of the development plan document and invited them to make representations about its contents?</p>	<p>The Issues and Options report was sent to all statutory consultees (350 in total) taken from the GNDP consultation database at the start of the consultation process.</p> <p>The Regulation 25 (Technical Consultation) document was distributed to those set out in the document entitled Technical Consultation Regulation 25 Consultees.</p> <p>As such all general consultation bodies set out in the regulations have been invited to make representations.</p> <p>See SCI, Issues and Options consultation report, List of Technical Consultation Regulation 25 Consultees.</p>
<p>3. Are you inviting representations from people resident or carrying out business in your area about the content of the development plan document?</p>	<p>Every resident in Broadland, Norwich and South Norfolk were invited to make representations on the Issues and Options consultation with all residents being sent a letter and leaflet. The summary leaflet was also sent to some 3600 organisations including environment, heritage and community groups, landowners and developers, housing associations, health and social care groups, black and minority ethnic groups, utility providers and individuals who have expressed a wish to be kept informed.</p> <p>At the Regulation 25 (Technical Consultation) stage letters were sent to every household and business informing them of the consultation but outlining that it was to gather technical information. The letter contained detail of the next consultation period in which they would be invited to participate.</p>

Activity	Evidence provided
4. Are you engaging with stakeholders responsible for delivery of the strategy?	<p>A range of statutory bodies, utilities and service providers, key local, district and county wide organisations and developers were invited to submit evidence and engage at the Regulation 25 technical consultation stage. These stakeholders have been involved in and will continue to be involved at each stage.</p> <p>The Technical Consultation Full Report produced by Marketing Assistance contains the responses and a summary. Several meetings and workshops have been held with the Local Strategic Partnerships (LSPs) and meetings have also been held with schools and the Third Sector Forum.</p>
5. Are you taking into account representations made?	<p>A consultation report was produced following the Issues and Options consultation which shows the results from the consultation. The comments were taken into consideration when working up the preferred options. Work carried out on the preferred options was subsequently taken forward to the Regulation 25 technical consultation.</p> <p>The Technical Consultation Full Report produced by Marketing Assistance contains the responses to the consultation. These representations along with those received at the Regulation 25 public consultation stage will be used to help inform the submission document.</p> <p>See consultation report produced by Marketing Assistance, Issues and Options consultation report, topic papers and the Cabinet Papers following GNDP Policy Group meetings from Apr 08, Dec 08, Feb 09 & Sept 09.</p>
6. Does the consultation contribute to the development and sustainability appraisal of alternatives?	<p>The choices made for the Joint Core Strategy policy options were informed by the consultation responses and the ongoing, iterative sustainability appraisal process and its assessment outputs. SA is an iterative process and as it has been updated and audited, revisions have been placed on the website.</p> <p>Consultation (Issues and Options and Regulation 25 technical consultation) influenced the Joint Core Strategy and fed into a re-appraisal of the SA for the Regulation 25 public consultation, and a subsequent re-edit. The JCS has changed partly because of consultation and SA.</p> <p>As the GNDP moved towards a single favoured option to take forward, sustainability appraisal continued to provide an independent review of emerging policy options. An evaluation of the three options at technical stage led to the December 2008 favoured option and SA showed Mangreen to be poorly performing which contributed to it being omitted from the JCS. SA is a valuable decision-making tool and has been used to check the evolution of strategies. The SA will accompany the Regulation 25 public consultation for comment.</p> <p>See consultation statements which set out how the sustainability appraisal and public consultation were taken into consideration in the development of the options and policies.</p>

Activity	Evidence provided
<p>7. Is the participation:</p> <ul style="list-style-type: none"> • following the principles set out in your statement of community involvement • integrating involvement with the sustainable community strategy • proportionate to the scale of issues involved in the development plan document? 	<p>A comparison of three SCIs was done in the early stages to ensure that the consultation process was in accordance with the three SCIs. A Statement of Compliance has been produced which covers each stage.</p> <p>The Local Strategic Partnerships for Broadland, Norwich and South Norfolk were invited to comment at both the Issues and Options and the Regulation 25 stages.</p> <p>The consultation process has been proportionate to the scale of issues involved. The Issues and Options consultation commenced with a launch event and there has been continuous engagement with key stakeholders and delivery agencies through the process. The area affected by the Joint Core Strategy goes beyond the Joint Core Strategy area. All neighbouring authorities and parishes were consulted.</p> <p>See statement of compliance with SCIs.</p>
<p>8. Are you keeping a record of:</p> <ul style="list-style-type: none"> • the individuals or bodies invited to make representations • how this was done • the main issues raised? 	<p>The consultation report for both the Issues and Options stage and Regulation 25 technical consultation records how the consultation was carried out and the main issues that were raised.</p> <p>See Consultation reports</p>
<p>9. Are you developing a framework for monitoring the effects of the development plan document?</p>	<p>An initial table which identifies the Core Output Indicators and Local indicators was drawn up as part of the Preferred Options process. This still needs to be reviewed and worked up further for the draft JCS and as such was not consulted on as part of the Regulation 25 technical consultation. The decision was taken that including a detailed monitoring framework in the consultation would detract from the main purpose of consultation which is to seek the public's views on emerging policy.</p>
<p>10. Have you arranged to send copies of documents used in consultation to the Government Office and Planning Inspectorate?</p>	<p>Go-East were sent a letter at each stage of the consultation.</p> <p>A Planning Inspectorate (PINS) review was undertaken prior to the start of the Regulation 25 Public Consultation. The report flagged up some necessary changes which were carried out before the public consultation document was finalised.</p>

(Regulation 25 public consultation)

Activity	Evidence provided
<p>1. Are you preparing reasonable alternatives for evaluation during the preparation of the development plan document?</p>	<p>At the Issues and Options stage ten potential growth options were put forward (plus brownfield sites in the city & suburbs). The Sustainability Appraisal was used to select options to take forward along with other evidence such as the Water Cycle Study, Public Transport Modelling Report and discussions with Children’s Services.</p> <p>The preferred options process considered alternatives for growth options and area-wide policies. The alternatives were assessed and captured in the SA document and remain in it as evidence of considering reasonable alternatives.</p>
<p>2. Have you assessed alternatives against:</p> <ul style="list-style-type: none"> • consistency with national policy • general conformity with the regional spatial strategy? 	<p>At the Issues and Options stage the East of England Regional Assembly (EERA) responded to say that the document did not give rise to any conformity issues and commended the three authorities for working together to produce a joint document. Go-East and EERA were consulted at both Regulation 25 stages. At the technical consultation stage EERA confirmed that the JCS was in general conformity with the RSS except in areas detailed in part three of the report. These included the need to strengthen policies such as prioritised brownfield land to the fullest extent and the need to reduce environmental impact as well as only considering Long Stratton if alternative funding could be identified. At the Regulation 25 public consultation stage EERA responded to say that policy 5 was in general conformity with the East of England Plan.</p> <p>Go-East are members of the GNDP Director’s group, so are continually involved in discussions of strategy and policy development and understand reasons for GNDP’s choices.</p> <p>The GNDP commissioned Planning Officers Society enterprises (POSe) to provide a review/critical friend service (Keith Nicholson) to audit the emerging JCS against procedures and national policy.</p>
<p>3. Are you having regard to:</p> <ul style="list-style-type: none"> • adjoining regional spatial strategies, the spatial development strategy for London, or Welsh Spatial Plan (as appropriate) • the National Planning Framework for Scotland? 	<p>Not applicable – the area covered by the Joint Core Strategy is not in close proximity to an adjoining region.</p>

Activity	Evidence provided
<p>4. Are you having regard to:</p> <ul style="list-style-type: none"> • the sustainable community strategy of the authority or other authorities whose area comprises part of the area of the council • any other local development documents adopted by the council? 	<p>The Sustainable Community Strategies for Broadland, Norwich and South Norfolk and the County Strategic Partnership lead the communities' own local aspirations and provided a context for this Joint Core Strategy. Page 14 of the Issues and Options Document sets out the main themes of the Sustainable Community Strategies. The Spatial Vision and Objectives topic paper and workshop along with the paper entitled "Integrating the Local Development Framework and the Sustainable Community Strategy" show the initial work which was carried out to ensure that the plan has regards to the Sustainable Community Strategies. There have been joint LSP meetings where the emerging JCS has been discussed, developed and endorsed, (especially the shared vision and planning objectives to ensure that it fits in with the Sustainable Community Strategies).</p> <p>This is the first of the Local Development Documents to be produced by each of the authorities.</p>
<p>5. Do you have regard to other matters and strategies relating to:</p> <ul style="list-style-type: none"> • resources • the regional development agencies' regional economic strategy • the local transport plan and transport facilities and services • waste strategies • hazardous substances and accidents? 	<p>Resources – evidence based around Greater Norwich Integrated (Stages 1, 2a and 2b) Water Cycle Study, Green Infrastructure Study, Greater Norwich Infrastructure Needs and Funding Study. With regards to minerals Norfolk County Council are partners on the GNDP and as such have been involved in decision making.</p> <p>Regional Economic Strategy – The East of England Development Agency (EEDA) has been involved in the consultation process and sit on the GNDP Policy Group. Shaping Norfolk's Future is a body which is integrated with the GNDP and is a member of the GNDP Director's group.</p> <p>Transport – Norfolk County Council are part of the GNDP</p> <p>Waste – Norfolk County Council are part of the GNDP</p> <p>Hazardous substances – All hazardous zones have been avoided. The JCS is not site specific with detailed locations for new homes/jobs/facilities to be developed in greater detail at a later stage. The Health and Safety Executive did not provide a response to the consultation.</p> <p>Assessment is also being undertaken to assess the likely significant effects on habitats.</p> <p>Also see SA Scoping Report.</p>

Activity	Evidence provided
<p>6. Are you having regard to the need to include policies on mitigating and adapting to climate change?</p>	<p>Climate change is a thread running through the plan. It is identified in the vision, objectives and environmental/sustainability policies. Policies on climate change have been changed and strengthened during editing following Regulation 25 consultations.</p> <p>The Environment chapter of the Issues and Options document considered climate change and reducing environmental impact. Policy 13 of the Regulation 25 Consultation addresses mitigating and adapting to climate change. EERA has identified that this policy needs strengthening further.</p> <p>Furthermore there have been various studies carried out which have helped inform this policy including:</p> <ul style="list-style-type: none"> • Greater Norwich Sustainable Energy Study • Green Infrastructure Study • Strategic Flood Risk Assessment. • Greater Norwich Integrated Water Cycle Study (Stages 1, 2a and 2b) Water Cycle Study <p>See Issues and Options Document, Regulation 25 consultation and studies mentioned above.</p>
<p>7. Have you undertaken the necessary sustainability appraisal of alternatives, including consultation on the sustainability appraisal report?</p>	<p>As part of the development of the 'options' in the Issues and Options consultation document the emerging policy options and suggested alternatives were appraised using the appraisal assessment matrix brought forward through the SA Scoping Report. This document was consulted upon at the same time as the Issues and Options. A summary report was also produced.</p> <p>Further Sustainability Appraisal was carried out to accompany the preferred option process of the Joint Core Strategy under the pre-June 2008 plan-making procedures. The SA was updated to incorporate three growth options for the Norwich Policy Area, that were included in the July 2008 Regulation 25 Joint Core Strategy technical consultation under the new procedures and has since been updated to take account of, and inform the favoured options for the Joint Core Strategy. The revised SA was not published on the website in time for the public consultation so the period for comments was extended by six weeks and all consultees notified of this and that the SA was available for comments.</p> <p>The SA will be refined and finalised when the Joint Core Strategy is published under Regulation 27, before submitting it to the Secretary of State.</p>

Activity	Evidence provided
8. Are you setting out clear reasons for any preferences between alternatives?	<p>The choice of strategic options were political decisions and were made having considered all of the evidence and the consultation responses. Studies have helped gather a comprehensive evidence base, which was reported to Members and Directors to help them come to a decision for both the three options and the favoured options. The favoured option draws on the responses and other evidence gathered and takes account of the latest information on current and past housing supply.</p> <p>See topic papers for further explanation.</p>
9. Have you taken into account any representations made on the content of the development plan document and the sustainability appraisal?	<p>Individual responses from both the technical and public Regulation 25 consultations are recorded on the JDI database. GNDR responses and actions are also recorded for each representation made. The JCS incorporates changes where practicable. The recommendations from the SA are also incorporated where practicable.</p>
10. Are you keeping a record?	<p>Comments received at the Regulation 25 stages will be given full consideration in finalising the JCS. Individual responses will be provided for each representation and there will be an overall consultation report which will show how the representations have helped formulate the JCS.</p>

Activity	Evidence provided
<p>11. Where sites are to be identified or areas for the application of policy in the development plan document, are you preparing sufficient illustrative material to:</p> <ul style="list-style-type: none"> • enable you to amend the currently adopted proposals map • inform the community about the location of proposals? 	<p>At the Regulation 25 public consultation stage, maps were produced which showed broad locations.</p> <p>The Joint Core Strategy mainly considers broad areas for growth and not specific sites. The strategic growth locations identified within South Norfolk are indicative and shown as areas of search whereas the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle in Broadland is located within the proposed Area Action Plan boundaries. Broadland District Council consulted on this Area Action Plan in parallel with the JCS which provided the community with more detail of the proposal.</p>
<p>12. Are the participation arrangements compliant with the statement of community involvement?</p>	<p>The consultations were compliant with the SCI.</p> <p>See the Statement of Compliance for further details.</p>
<p>13. Have you remained in close contact with the Government Office and discussed any emerging issues that might affect the soundness of the development plan document?</p>	<p>A representative from Go-East is on the directors group and policy group.</p> <p>A PINS review was undertaken in February 2009. This raised some issues which needed addressing before the Regulation 25 public consultation document was finalised.</p>

Activity	Evidence provided
1. Have you prepared the sustainability appraisal report?	
2. Have you made clear where and within what period representations must be made?	
3. Have you made copies of the following available for inspection: <ul style="list-style-type: none"> • the proposed submission documents • the statement of the representations procedure? 	
4. Have you published on your website the following: <ul style="list-style-type: none"> • the proposed submission documents • the statement of the representations procedure • statement and details of where and when documents can be inspected? 	
5. Have you sent to each of the specific consultation bodies invited to make representations under Regulation 25(1): <ul style="list-style-type: none"> • a copy of each of the proposed submission documents • the statement of the representations procedure? 	

Activity	Evidence provided
<p>6. Have you sent to each of the general consultation bodies invited to make representations under Regulation 25(1):</p> <ul style="list-style-type: none"> • the statement of the representations procedure • where and when the documents can be inspected? 	
<p>7. Have you given notice by local advertisement setting out:</p> <ul style="list-style-type: none"> • the statement of the representations procedure • where and when the documents can be inspected? 	
<p>8. Have you requested the opinion of the regional planning body regarding the general conformity of the development plan document with the regional spatial strategy?</p>	

Question	Evidence provided
1. Are you ready to submit the DPD?	
2. Are there any major issues revealed by the representations on publication?	
3. Are all the relevant documents in place?	
4. Has the development plan document been prepared in accordance with the local development scheme?	
5. Does the development plan document's listing and description in the local development scheme match the document?	
6. Have the timescales set out in the local development scheme been met?	
7. Has the development plan document had regard to any sustainable community strategy for its area (like a county and district)?	
8. Is the development plan document in compliance with the statement of community involvement (where one exists)?	
9. Has the council carried out consultation as described in the statement of community involvement?	

Question	Evidence provided
10. Has the development plan document been subject to sustainability appraisal?	
11. Has the council provided a final report of the findings of the appraisal?	
12. Is the development plan document to be submitted consistent with national policy?	
13. Does the development plan document contain any policies or proposals that are not in general conformity with the regional spatial strategy?	
14. If yes, is there local justification?	
15. Has the council got confirmation from the regional planning body about the general conformity of the plan with the regional spatial strategy?	
16. Does the development plan document comply with the 2004 regulations (as amended)?	
17. Specifically, has the council published the prescribed documents, and made them available at their principal offices and their website?	

Question	Evidence provided
18. Has the council placed local advertisements?	
19. Has the council notified the development plan document bodies?	
20. Does the development plan document contain a list of superseded saved policies?	
21. Are there any policies applying to sites or areas by reference to an Ordnance Survey map or to amend an adopted proposals map?	
22. If yes, have you prepared a submission proposals map?	
23. If the development plan document is not a core strategy, is it in conformity with the core strategy?	
24. Have you prepared a statement setting out: <ul style="list-style-type: none"> • which bodies and persons were invited to make representations under Regulation 25 • how they were invited • a summary of the main issues raised • how the representations have been taken into account? 	

Question	Evidence provided
25. Have you prepared a statement giving: <ul style="list-style-type: none"> • the number of representations made under Regulation 28(2) • a summary of the main issues raised OR • that no representations were made? 	
26. Have you collected together all the representations made under Regulation 28?	
27. Have you assembled the relevant supporting documents?	
28. Has your council approved the development plan document for submission?	
29. Have you sent the Secretary of State (the Planning Inspectorate) a paper copy of the following: <ul style="list-style-type: none"> • the development plan document • the submission proposals map (unless there are no site allocation policies) • the documents prescribed in Regulation 30(1)? 	

Question	Evidence provided
<p>30. Have you sent the Secretary of State (the Planning Inspectorate) an electronic copy of the:</p> <ul style="list-style-type: none"> • development plan document • submission proposals map (unless there are no site allocation policies) • documents prescribed in Regulation 30(1)? 	
<p>31. Have you made the following available at the same places where the proposed submission documents were to be seen:</p> <ul style="list-style-type: none"> • the development plan document • the documents prescribed in Regulation 30(1)? 	
<p>32. On your website, have you published the:</p> <ul style="list-style-type: none"> • development plan document • submission proposals map • sustainability appraisal report • Regulation 30(1)(d) statement • Regulation 30(1)(e) statement • supporting documents (where practicable) • representations made under Regulation 28 (where practicable) • statement as to where and when the development plan document and the documents are available? 	

Question	Evidence provided
<p>33. For each specific consultation body invited to make representations under Regulation 25(1), have you sent the:</p> <ul style="list-style-type: none"> • development plan document • submission proposals map • sustainability appraisal report • adopted statement of community involvement • Regulation 30(1)(d) statement • Regulation 30(1)(e) statement • supporting documents you consider relevant to each body • statement as to where and when the development plan document and the documents are available? 	
<p>34. For each general consultation body invited to make representations under Regulation 25(1), have you sent:</p> <ul style="list-style-type: none"> • notification that the documents prescribed in Regulation 30(1) are available for inspection • where and when they can be inspected? 	

Question	Evidence provided
<p>35. Have you given notice by local advertisement setting out:</p> <ul style="list-style-type: none"> • the title of the development plan document • the subject and area covered by the development plan document • notification that the documents prescribed in Regulation 30(1) are available for inspection • where and when they can be inspected? 	
<p>36. Have you given notice to persons who have requested to be notified that submission has taken place?</p>	
<p>37. If an examination is being held, at least six weeks before its opening has the Programme Officer:</p> <ul style="list-style-type: none"> • published the time and place of the examination and the name of the person appointed to carry out the examination on your website • notified those who have made representations on the published development plan document which have not been withdrawn of these details • advertised these details? 	

Soundness

Key question	Evidence provided
Justified	
Participation	
1. Has the consultation process allowed for effective engagement of all interested parties?	<p>Yes, the consultation process has followed the requirements of PPS12 and the regulations (as amended) and the three SCIs and has been proportionate to the scale of issues involved. However a number of policies have been significantly revised since the Regulation 25 public consultation in light of new evidence and responses from the consultation. These include policies on climate change, the environment, good design, energy conservation and the protection of local distinctiveness as well as a review of the settlement hierarchy and the revision of the implementation policy.</p> <p>For further detail see consultation statements and the Statement of Compliance.</p>
Research/ fact finding	
2. Is the content of the development plan document justified by the evidence? 3. What is the source of the evidence? 4. How up to date and convincing is it?	<p>A number of evidence studies have been undertaken and these determine the major infrastructure and sustainability needs facing the area over the planned growth period. These studies are detailed in Appendix 2 of the Joint Core Strategy for Broadland, Norwich and South Norfolk: Proposed Submission document.</p> <p>The report to the GNDP Joint LDF Group (21 April 2008) sets out what the evidence told us about each topic area. The draft SA report of Regulation 25 (23 April 2009) sets out the main conclusion for the options appraised and the proposed policies.</p> <p>It was important to test out various approaches and look at a range of locations and combinations of places. Options have been consistent for Norwich (urban focus in all options) and North east in Broadland (in all options). This was the only location that performed well compared with the evidence and the SA. In South Norfolk the choice of locations and scales of growth have been subject to considerable public debate which has led to changes. The choice of the growth strategy will be explained in a topic paper.</p>

Key question	Evidence provided
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<p>The favoured option draws on the responses to the technical consultation and other evidence gathered and takes account of the latest information on current and past housing supply. This is not the option that best meets the technical evidence or the sustainability appraisal but it is the strategic preference of the GNDD. It is pragmatic and reasonable and is a compromise in response to public comment.</p> <p>There were few assumptions because of the wide evidence base and clearly expressed public aspirations (through SCSs). There is a comprehensive evidence base but the evidence itself is based on assumptions that will be tested through implementation and monitoring.</p> <p>The Greater Norwich Infrastructure Needs & Funding Study: Key Assumptions Paper (March 2009) sets out the key assumptions about how the impact of growth on the various elements of infrastructure should be modelled in order to determine the infrastructure required. This paper became Appendix 2 of the Greater Norwich Infrastructure Needs and Funding Study 2009.</p> <p>Other assumptions include:</p> <ul style="list-style-type: none"> • Rates of development which can be achieved on major developments • Market conditions relating to residential, commercial and retail development (affects rates of delivery, potential development contributions, on-site delivery of green infrastructure, delivery of affordable housing, suitability and deliverability of existing employment allocations, scale of new retail development, prospects for mixed uses, Long Stratton bypass • Prospect of HCA support • Future economic performance of the local economy • Future funding of utilities through asset management plans • Future funding for major transport infrastructure through regional funding allocations prioritisations and Local Transport Plan • Network Rail and regulations governing the use of rail that will allow the mixed running of the heavy rail and tram trains to serve Rackheath • Availability of future mainstream funding for other infrastructure including schools, adult social services, health care • Outcome of Environment Agency's review of consents • The introduction of a Community Infrastructure Levy

Key question	Evidence provided
	<p>Scott Wilson in their audit of the Issues and Options SA identified that many assumptions were made during the SA process about how the option would be implemented and picked up on the fact that many of the assumptions made are not clear. They stated that the 'assumptions should be made more explicit than is currently the case'.</p>
Alternatives	
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>The favoured option is appropriate given the reasonable alternatives and takes account of both the evidence base and local political views.</p> <p>The Issues and Options stage considered various growth location options. The draft preferred options report (GNDP Joint LDF Group 21/04/08) sets out reasons for rejecting options along with results from the evidence studies and Issues and Options consultation. The subsequent Regulation 25 (technical consultation) stage considered three reasonable alternatives were considered and SA was undertaken. These were also included in the appendices at the Regulation 25 (public consultation) stage, for further comment.</p> <p>The favoured option differs from other options and needed to reflect updated housing completion figures, political views and technical views. Because the JCS crosses local authority boundaries. The outcome required to GNDP to reach consensus on the JCS and major reports were taken to the GNDP policy group in December 2008, February 2009 and September 2009 which drew members' attention to the significant evidence base to inform their decisions.</p> <p>The consultation reports, minutes from meetings from the GNDP Policy Group and the topic papers identify how and why decisions were made.</p>

Key question	Evidence provided
<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<p>Yes. SA has informed the plan making process from the earliest stage, with the collection of baseline information and the scoping of relevant strategies and plans informing the content of the Issues and Options document.</p> <p>As part of the development of the 'options' in the Issues and Options consultation document the emerging policy options and suggested alternatives were appraised using the appraisal assessment matrix brought forward through the SA Scoping Report. The 11 growth areas were also subject to SA. This document was consulted upon at the same time as the Issues and Options. A summary report was also produced.</p> <p>Further Sustainability Appraisal was carried out to accompany the preferred option of the Joint Core Strategy under the pre-June 2008 plan-making procedures; however all significant progress was halted by a change in the regulations.</p> <p>The SA was updated to incorporate the three growth options for the Norwich Policy Area, that were included in the July 2008 Regulation 25 JCS technical consultation under the new procedures. The SA informed the combination of places and the best performing options. The reasonable alternatives were also subject to SA which were generally based on the best locations in the first place.</p> <p>A further update was carried out to take account of, and inform a single favoured option for the JCS. The Regulation 25 public consultation was extended so people could comment on the SA as part of their representations. The SA has been refined and finalised and will be published under Regulation 27, before submitting it to the Secretary of State.</p>
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<p>Yes. The Joint Core Strategy implements and expands upon the Regional Spatial Strategy (RSS) locally by</p> <ol style="list-style-type: none"> setting out the areas for major growth focusing around Norwich promoting more sustainable means of transport addressing deprivation promoting Norwich as a retail, employment, leisure, cultural city interpreting the lower level of the settlement hierarchy for rural areas clarifying strategic employment locations building on affordable housing, environment, renewable energy and water policies <p>Consultation with GO-East and EERA has confirmed that the proposed Joint Core Strategy is in general conformity with the RSS and outlines where policies need strengthening.</p>

Key question	Evidence provided
Effective	
Deliverable	
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p>	<p>The spatial vision and objectives clearly identify what issues the Joint Core Strategy is seeking to address and paragraph 5.3 of the Regulation 25 public consultation document sets out the common themes with the Sustainable Community Strategy. An exercise was also carried out in the initial stages of plan preparation which links the four community strategies and their visions with the joint spatial planning objectives. The PINS review (Jan/Feb 2009) recommends that greater cross-referencing is made to the relationship between the SCS and the JCS in the final form of the JCS. Each section of the public consultation document contained a reasoned justification for the policy and this includes detail on the issues that the policies address.</p> <p>Section 10 of the Sustainability Appraisal Scoping Report identifies the sustainability issues to be considered when producing the Local Development Framework for the Greater Norwich area.</p> <p>Nine issues workshops were held in the greater Norwich area in 2007 to help inform the production of the Issues and Options report. Each workshop dealt with a different theme. The Issues and Options Report on Consultation sets out the main issues raised by the community at both the workshop stage and Issues and Options stage.</p> <p>In summary, the objectives were clear in the workshop topic papers, issues and options document and the Sustainable Community Strategy (SCS). The SCS contains the priorities for the area and through consultation with the Local Strategic Partnerships and discussion with Members, it has been confirmed that all the priorities set out in the JCS have equal importance.</p>
<p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p> <p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<p>The decision was taken to produce a Joint Core Strategy to address many of the cross-boundary issues. All neighbouring authorities have been consulted on the document and the Sustainability Appraisal. Furthermore Norfolk County Council forms part of the Greater Norwich Development Partnership.</p> <p>Cross boundary issues addressed include Wroxham/Hoveton, Beccles/Bungay, A11 dualling. Other cross cutting issues are examined by the Water Cycle Study and the Appropriate Assessment.</p>

Key question	Evidence provided
16. Does the development plan document contain clear objectives?	Yes. The Joint Core Strategy contains clear objectives which have derived from the Sustainable Community Strategies and the vision. They have evolved over time following SA and consultation and can be identified in the topic papers, Issues and Options document, and both stages of the Regulation 25 consultations.
17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere? 18. Is there a direct relationship between the identified issues and the objectives?	Yes. The objectives are specific to the area. The vision and objectives show how the spatial planning elements of the Sustainable Community Strategies can be achieved.
19. Is it clear how the policies will meet the objectives? 20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?	There are clear links between the Sustainable Community Strategies and the objectives and each policy sets out which objectives it meets. The monitoring framework shows how Local Area Agreement (LAA) targets (and other targets) will be monitored. There are no obvious gaps in the policies with regard to the objectives.
21. Are there realistic timescales related to the objectives?	Appendix 7 of the Joint Core Strategy contains the Implementation framework which sets out the necessary services, facilities and infrastructure schemes, delivery body, estimated cost, funding source, which strategic site it is critical to and the estimated delivery date. The table is drawn from the Greater Norwich Infrastructure Needs and Funding Study – 2009. The LSPs and service providers have been engaged in the preparation of the JCS (and studies); commitment will be sought from these bodies that the timescales are realistic in terms of delivery. This will take place at the same time as the Regulation 27 consultation.
22. Are the policies internally consistent?	Policies are internally consistent with the strategy seeking a balance between economic development and the environment. The delivery of infrastructure is a key requirement; however the favoured option is not the lower cost strategy. This may have impacts on providing affordable housing.

Key question	Evidence provided
<p>23. Does the development plan document contain material which:</p> <ul style="list-style-type: none"> • is already in another plan • should be logically be in a different plan • should not be in a plan at all? 	<p>The Joint Core Strategy does not contain material which is in another plan. It follows national guidance and the Regional Spatial Strategy.</p> <p>The JCS identifies broad locations for growth and in the case of the north east area, identifies Area Action Plan boundaries. As such it does not contain information which should be in the site allocations plan. The vision, objectives and polices within the Joint Core Strategy build on national and regional guidance and sets out the broad strategy for the area; they do not set out criteria based policies against which the majority of planning applications will assessed.</p>
<p>24. Does the development plan document explain how its key policy objectives will be achieved?</p>	<p>Appendix 7 of the Joint Core Strategy contains the Implementation framework which sets out the scheme, delivery body, estimated cost, funding source, which strategic site it is critical to and the estimated delivery date. The table is drawn from the Greater Norwich Infrastructure Needs and Funding Study – 2009.</p> <p>Commitment will be sought from LSPs and service providers to agree that the timescales are realistic in terms of delivery. This will take place at the same time as the Regulation 27 consultation.</p>
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<p>This document does not contain Development Management policies.</p>
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<p>The Norwich Growth Area – Infrastructure Need and Funding Study – 2007 identified the infrastructure requirements for 33,000 additional dwellings within the Norwich Policy Area. It was based on two hypothetical growth options.</p> <p>The Greater Norwich Infrastructure Needs and Funding Study – 2009 assesses the infrastructure requirements, based on up to date information and the agreed key assumptions. This is reflected in the Implementation framework.</p> <p>The Risk Log identifies the risks associated with the JCS. The delivery of the JCS is dependent on a wide range of infrastructure and is an expensive option.</p>

Key question	Evidence provided
27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?	The delivery 'vehicle' for co-ordination, prioritisation and management, including contributions and funds, is the Greater Norwich Development Partnership (GNDP). The GNDP will develop and manage a delivery programme supporting the implementation of this Strategy. The programme will be developed through the Integrated Development Programme (IDP). The key elements of the programme are set out in the draft Implementation framework in Appendix 7 of the JCS.
28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?	The Implementation framework identifies delivery bodies for each scheme and the estimated delivery date. It will be expanded on further in the IDP. There are some areas where further detailed work needs to be undertaken and the timetable for funding is not in alignment with the preparation of the Joint Core Strategy.
29. Is it clear who is intended to implement each part of the strategy/development plan document?	Appendix 6 of the JCS contains the Implementation framework which sets out the necessary services, facilities and infrastructure schemes, the delivery body, estimated cost, funding source, which strategic site it is critical to and the estimated delivery date. The table is drawn from the Greater Norwich Infrastructure Needs and Funding Study – 2009.
30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?	Service providers have been engaged in the production of the JCS; however commitment has still to be sought on delivery. This will take place at the same time as the Regulation 27 consultation.

Key question	Evidence provided
<p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?</p>	<p>Yes – the vision describes what sort of area we are aiming for in the future and shows how the spatial planning elements of the Sustainable Community Strategy can be achieved. The JCS contains detail about development and change in the area, it sets out broad locations for growth but also addresses wider issues such as promoting healthier lifestyles and facilitating job growth and training opportunities.</p> <p>There was a large dialogue with LSPs and service providers (including Norfolk County Councils Children’s Services – education and social services).</p>
<p>33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council’s views about the matter?</p>	<p>There are few of these. Local Government reorganisation has affected discussions about delivery arrangements. There are a few other external constraints, including the housing share of the Norwich Policy Area although there is the ability to redistribute growth if locations are delayed.</p>
Flexible	
<p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<p>There is no ‘plan B’ to build in flexibility over key infrastructure. However, major growth relies on infrastructure. There is no rigid planning regime as housing allocations are expressed as minima for each location which will allow for some limited increase if other locations are delayed. The only phasing mechanism is the availability of infrastructure.</p> <p>Key assumptions are set out in the Greater Norwich Infrastructure & Funding Study: Key Assumptions Paper (Appendix B of the study). Circumstances when policies might need to be reviewed are still to be worked up.</p> <p>The Monitoring framework in Appendix 8 of the JCS includes performance indicators and targets to assess how the strategy’s objectives are being met which will be reported through the Annual Monitoring Report. The outcome will inform the need for reviews of the IDP, the Joint Core Strategy and other Local Development Documents.</p>

Key question	Evidence provided
35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional spatial strategy?	Over 10% of growth is not tied to a major growth location. There is an over allocation of homes in the plan. The North East area could rise to 10,000 (+3,000) dwellings post 2026.
36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?	No. The plan will be reviewed in the event of a critical shortfall for infrastructure provision.
Monitoring	
37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?	See Appendix 6, 7 and 8 of the JCS document for housing trajectory, implementation and monitoring frameworks.
38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	The Monitoring framework sets out the indicator, agencies, target and source. The indicators will be reported through the Annual Monitoring Reports for Broadland, Norwich and South Norfolk.
39. Are suitable targets and indicators present (by when, how and by whom)?	The Monitoring framework sets out the indicators, agencies, target and source.

Key question	Evidence provided
National policy	
<p>40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?</p> <p>41. If yes, is there a local justification?</p>	<p>A representative from GO-East is on the directors group and policy groups. At the Issues and Options stage EERA responded to say that the document does not give rise to any conformity issues and commended the three authorities for working together to produce a joint document.</p> <p>Go-East and EERA were consulted at both Regulation 25 stages. At the technical consultation stage EERA confirmed that the JCS is in general conformity with the RSS except in areas detailed in part three of the report. These included strengthening policies such as prioritising brownfield land to the fullest extent and reducing environmental impact as well as only considering Long Stratton if alternative funding can be identified. At the public consultation stage EERA confirmed that Policy 5 was in general conformity with the East of England Plan.</p> <p>The JCS does not identify any policies which are not consistent with national planning policies.</p>
<p>42. Does the development plan document contain policies that do not add anything to existing national guidance?</p> <p>43. If so, why have they been included?</p>	<p>No. The JCS follows national guidance and applies it locally.</p>

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format or language, please phone:

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Soundness Self Assessment

Joint Core Strategy for Broadland, Norwich and South Norfolk