

**Part 1. Personal Details**

Representations can not be considered anonymously. All representations made will be available for public inspection by appointment, and will be published on the GNDP website. However, this will exclude address, telephone number and email address of respondents which will be used for GNDP purposes<sup>1</sup> only and will be removed from the published representations.

**1. Personal Details\***

**2. Agent's Details (if applicable)**

\*if an agent is appointed, please complete only the Title and Name boxes in below, but complete the full contact details of the agent in column 2.

Title	Ms	
First Name	Denise	
Last Name	Carlo	
Job Title (where relevant)	Policy Consultant	
Organisation (where relevant)	Norwich & Norfolk Transport Action Group	
Address Line 1	[REDACTED]	
Line 2		
Line 3		
Line 4		
Post Code		
Telephone number		
Email address		

<sup>1</sup> The above personal data will be processed in accordance with the Data Protection Act 1998 and will only be used by the Greater Norwich Development Partnership, and its constituent bodies, for the purposes of contacting you about the Joint Core Strategy. It will not be passed on to any third parties.

## Part 2a. Your Comments on Legal Compliance

**3. Are the Main Modifications to the Joint Core Strategy for Broadland, Norwich and South Norfolk: Broadland part of the Norwich Policy Area legally compliant? (please refer to the guidance notes below for explanation)**

Yes

No

No

No  
Comment

Please use the space below to provide more detailed comments:

All reasonable alternatives have not been considered as required by the High Court.

Proposed Mods do not comply with EU Directive on SEA on need to consider climate change and reasonable alternatives.

## Part 2b. Your Representation on the Schedule of Main Modifications

Please use a separate sheet for each reference number.

**4. Please state the relevant reference number that you are commenting on from the Schedule of Main Modifications in the box below (e.g. MM1). If your comment relates to the Sustainability Appraisal Addendum, HRA Addendum or the Additional (minor) Modifications please state this clearly in the box.:**

*Comments without the relevant reference number will not be accepted.*

**5. Do you consider the Main Modification you have referenced above to be 'Sound'? (please refer to the guidance notes for explanation of the term)**

Yes

No

No

**6. If you consider the Main Modification to be unsound please specify your reason below:** (tick all that apply)

A. It has not been positively prepared\*

No

B. It is not justified\*

No

C. It is not effective\*

No

D. It is not consistent with national policy\*

No

\* An explanation of the Tests of Soundness is provided in the guidance notes.

**7. Please give details of why you consider the Main Modification is unsound. Please be as precise as possible. If you wish to support the soundness of the Main Modification, please also use this box to set out your comments.**

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NNTAG finds the proposed Mods highly disappointing. The GNDP came up with exactly the same proposals to the remitted JCS. The Part JCS examination involved considerable time and effort for community groups. What has been the outcome? The Proposed Mods propose an even worse situation. Local people are faced with the prospect of additional growth if housing delivery in the NEGT falls below 90% threshold. This would be in addition to the NEGT, which contains sufficient land within its boundaries for 20,000 plus houses.

Local people want a different 'vision' of sustainable development to the one held by the GNDP.

At the Examination, the GNDP agreed with CPRE that the JCS housing target was 11,000 units in excess of the requirement. However, the Inspector maintains that the excess was acceptable.

Localism and what constitutes genuinely sustainable development have been ignored.

With regard to the carbon appraisal, the qualitative assessment isn't a serious response to a serious topic. We don't intend wasting out time commenting on it except to say that we don't believe that it satisfies the EU Directive on SEA.

The whole Part JCS exercise has been a major waste of resources.

**8. Please use the space below to give details of what alteration(s) to the Main Modification you consider necessary to make it sound and why. Please suggest revised wording.**

The Inspector will decide if further public hearing sessions are required as part of the examination process.

All representations on matters of soundness will be fully considered by the Inspector. You may choose to request to appear at a public hearing to clarify your comments on the Main Modifications.

**9. Do you consider it necessary to participate at the oral part of the examination? (If reopening the hearing is required by the Inspector)**

No, I do not wish to participate at the oral examination

Yes, I do wish to participate at the oral examination

**10. The Inspector may hold further examination hearings as a result of the representations. If you wish to participate at any examination hearing, please outline why you consider this to be necessary:**

**11. Do you wish to be notified of the following? (please tick as appropriate)**

The publication of the  
Inspector's Final Report

The adoption of the Joint Core  
Strategy for the Broadland part of  
the Norwich Policy Area

<b>Signature:</b>	D Carlo on behalf of NNTAG	<b>Date:</b>	21/10/13
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