



planning advisory service

# **Local Plans and the National Planning Policy Framework**

**Joint Core Strategy for Broadland, Norwich and  
South Norfolk**

**Submission to address the parts of the plan remitted  
by order of the High Court**

**December 2012**

## **Compatibility Self Assessment Checklist**

## Introduction (by Planning Advisory Service)

We have produced a checklist to help you assess the content of your local plan<sup>1</sup> against requirements in the National Planning Policy Framework (NPPF) that are new or significantly different from national policy previously set out in PPGs and PPSs.

*These elements are highlighted in red and in italics.*

Although not part of the NPPF it also includes the 'Planning policy for traveller sites' published on 23 March 2012.

### How will it help?

We want to help local authorities to get up-to-date plans in place. This tool will help you to:

- assess your local plan against national policy
- identify gaps
- understand risks
- start to plan how to manage those risks.

This will help you to:

- respond proactively and speedily to the NPPF
- prepare for an examination
- make robust planning decisions
- implement your policies.

PAS will continue to work with authorities through the NPPF transition period.

### Why does it matter?

It matters because to have a plan-led system we need to have sound plans in place. The transition arrangements give authorities with an adopted plan a year to get their policies 'up to date' (in conformity with the NPPF). After that, the policies will be judged by their degree of conformity and the presumption in favour of sustainable development will apply. If you haven't got a plan in place, you need to do so as soon as possible; the further along the process you are, and the closer the conformity of your policies, the more weight they will have (for full details see Annex 1 'Implementation' paragraphs 208-219).

For PAS's interpretation of what you need to know about transition, see ['Things we think you should know about the NPPF'](#).

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<sup>1</sup> We use the term "local plan" throughout this document. However, adopted plans may comprise a number of development plan documents prepared under the Planning and Compulsory Purchase Act 2004, in which case it may be all of those documents that a local planning authority may wish to consider in the context of the NPPF using this document.

## Who should use it?

The checklist was written with adopted plans in mind, but it should also be useful as a check for emerging local plans. It is for all planning authorities in England, including counties and National Parks.

## What it doesn't do

It is not an interpretation of national planning policy or a prescribed solution. It excludes the implications of the Localism Act. It doesn't deal with the process of plan-making or aspects of the NPPF which relate specifically to decision making. Nor does it list the things that you *don't* have to do any more as requirements have been dropped.

## What else are PAS doing?

There are more parts to this document to follow, including

- a comprehensive checklist of all requirements, new and retained,
- An understanding of what the 'gaps' or discrepancies might mean for you (your risks)
- Some actions you could take to address these risks

## How should you use it?

We have structured the checklist in the order of the NPPF, but you might want to prioritise the areas that you think are most important to your area and your overall strategy, and concentrate on the policy areas where you have the most development pressure.

The checklist has used, wherever possible, the same wording as that set out in the NPPF. However, our focus has been to capture the main 'prompts' that you need to consider while keeping the checklist to a reasonable length. However you should cross-refer to the NPPF itself whilst going through the checklist. We have provided paragraph references to help you do this.

Note, however, that this document highlights the new/significantly different bits of the NPPF compared to PPGs and PPSs. You'll need to think about whether, if you've quite an old adopted plan, it was fully compliant with more recent bits of government guidance (eg PPS3 revised June 2011).

The checklist concentrates on identifying where the gaps (or incompatibilities) are; you might want to also keep your own audit trail of the evidence you have identified to demonstrate compatibility, or otherwise, with the NPPF.

## How we made it

- We looked at the NPPF and the Impact Assessment published alongside the draft NPPF.
- We identified the main things that it asks or requires local plans to include, and highlighted those that are significantly different from previous national policy and guidance as set out in PPGs and PPSs.
- We turned this into a checklist, and set out some ideas about how local planning authorities could identify parts of their local plan that may be most at odds with this, what may happen as a result, and things they could do to manage this (*to follow*).
- We developed these ideas in consultation with a selection of local planning authorities.

We've worked with the Planning Inspectorate on this and it builds on pilot work done by the Inspectorate. The checklist is intended to provide a constructive starting point for any assessment of how the Framework impacts on plan preparation and is an important element of the support service referred to in paragraph 217 of Annex 1 to the National Planning Policy Framework

## What will happen to this document in the future?

It will be reviewed in the light of feedback from local planning authorities that have used it and other stakeholders and updated again as necessary later in 2012.

If you have any feedback please send it to PAS at:

Email: [alice.lester@local.gov.uk](mailto:alice.lester@local.gov.uk)

## Disclaimer

This is a PAS document and has not been endorsed by the Department for Communities and Local Government. We are positive that if you go through this exercise you will be able to make a judgment, with confidence, about how your plan relates to the requirements of the NPPF. It will also give you some indication of the sort of actions you may wish to pursue if you need to move towards alignment with the NPPF in any of the policy areas.

## **Introduction to this assessment (by Broadland, Norwich, and South Norfolk Councils)**

This toolkit, prepared by the Planning Advisory Service, was completed by Broadland, Norwich, and South Norfolk Councils to assist in the review of material published under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This followed the remittal of parts of the Joint Core Strategy (JCS) by Order of the High Court, following a challenge under Section 113 of the Planning and Compulsory Purchase Act, 2004.

Following additional Sustainability Appraisal work, as required by the Order of the High Court, the local planning authorities published material proposed for insertion into the part of the JCS which remained adopted. For this reason, this assessment against the NPPF has focused on the material proposed for insertion rather than attempting to address the compliance of the JCS as a whole with the NPPF.

The assessment was undertaken in July 2012 as a preliminary to the decision to submit the proposed additions to the JCS for formal examination. It has been subject to further minor amendments to support the JCS Submission Content.

## 1A: Achieving sustainable development

The presumption in favour of sustainable development and core planning principles (para 6-17)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p><i>Policies in local plans should follow the approach of the presumption in favour of sustainable development and guide how it should be applied locally (15).</i></p>	<p><i>Does the plan positively seek opportunities to meet the development needs of the area?</i></p> <p><i>Does the plan meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, (subject to the caveats set out in para14)?</i></p> <p><i>Do you have a policy or policies which reflect the principles of the presumption in favour of sustainable development? A <a href="#">model policy</a> is provided on the Planning Portal in the Local Plans section, as a suggestion (but this isn't prescriptive).</i></p>	<p>The remitted parts of the plan are concerned with the distribution of development and are entirely directed to meeting the development needs of the area.</p> <p>The remitted parts of the plan meet the objectively assessed needs of the area. These were established through a previous examination. The quantum of development has not been changed from that assessment. The plan as originally adopted includes a degree of flexibility, which was debated at an examination in late 2010. Since then, some of the areas of uncertainty, principally the funding of the NDR, been removed.</p> <p>There is no specific policy applying the presumption in favor of sustainable development, but the remitted text seeks to identify locations to accommodate development in the most sustainable way forward, and this is considered</p>	<p>While the JCS does not explicitly state the presumption in favour of sustainable development, its overall thrust is considered entirely consistent with the aims of the NPPF. As this is the remittal of a specific part of the JCS, such a policy would be likely to lie beyond the scope of the JCS at this stage, and be more appropriate to be included in the local plans of the individual LPAs.</p>

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		<p>entirely consistent with the NPPF.</p> <p>The development needs of the area were robustly assessed, with a detailed evidence base covering housing requirements, and confirming the Regional Strategy's housing provision figures, the need for economic development, and the potential for further retail floorspace.</p> <p>It was also supported by detailed assessments of the infrastructure required to support the strategy in a sustainable way.</p> <p>The JCS as a whole took into account social, economic and environmental considerations in demonstrating how the objectively assessed needs of the area could be met. The report of the Inspectors who conducted a public examination in late 2010 fully endorses the approach taken.</p>	
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<p>The NPPF sets out a set of 12 core land-use principles which should underpin plan-making (and decision-making) (17)</p>		<p>The remitted parts of the JCS are considered to be compatible with the land-use principles in paragraph 17 of the NPPF. Because of the restricted scale of the remitted text, not all are equally applicable, but there is not considered to be any conflict. In particular</p> <ul style="list-style-type: none"> <li>▪ It seeks to make a positive contribution to people's lives through an emphasis on high quality sustainable development (bullet 2)</li> <li>▪ It positively and proactively seeks to promote the development needed in the area, and in a way which will support ready access for new residents to employment both through proximity to existing employment areas, coupled with easy access, and by the promotion of mixed-use development. The need to deliver appropriate infrastructure is a critical part of the selection of the strategy and location for the development proposed in the remitted parts of the plan(bullet 3)</li> <li>▪ Other policies in the plan promote good design, and resilience to climate change, combined with energy and water efficiency (bullets 4 and 6). The strategy embodied in</li> </ul>	
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		<p>the remitted parts of the plan recognizes the qualities of the area in the protection given to environmental assets, and encouragement to incorporate these within new development through the masterplanning process. It also recognizes the potential for development in the location proposed to contribute towards strategic green infrastructure corridors consistent with the priorities in an agreed green infrastructure delivery plan was described in policy 10 (bullet 5)</p> <ul style="list-style-type: none"> <li>▪ The area proposed avoids the highest quality agricultural land, and the most sensitive landscapes. There are some cultural assets, in particular areas informally designated as historic park land, but the strategy recognizes this and requires their protection and conservation. This is set out in policy 10. There is specific reference to the need to include ecological buffer zones to protect the broads SAC, Broadland SPA and Broadland Ramsar sites. (bullet 7)</li> <li>▪ Little of the land proposed for</li> </ul>	
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		<p>development in the remitted parts of the plan is previously developed (bullet 8), but this complements our strategy which seeks to accommodate development in the urban area consistent with its capacity. Part of the appraisal of the appropriateness of the remitted parts of the plan for re-submission has been a re-examination of the potential of the urban area to accommodate development.</p> <ul style="list-style-type: none"> <li>▪ Mixed use development is promoted by the plan. An unremitted part of policy 10, which nevertheless sets a context for the remitted parts of the plan, seeks major growth in the form of “attractive, well serviced, integrated, mixed use development using a recognized design process ...”. In the case of the remitted sections of the plan, this includes a specific proposal for 25 hectares of employment land ( bullet 9)</li> <li>▪ Part of policy 10 in the remitted parts of the plan requires the restoration/ conservation of historic parkland and important woodland. Other parts of the remitted plan set the context</li> </ul>	
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		and reinforce the importance of protecting cultural assets, in particular policy 8. This requires existing cultural assets and leisure facilities to be maintained and enhanced, and embodies an expectation that development will provide for local cultural and leisure activities (bullet 10)	
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## 1B: Delivering sustainable development

1. Building a strong, competitive economy (paras 18-22)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Set out a clear economic vision for the area which positively and proactively encourages sustainable economic growth (21).	<i>Is there an up to date assessment of the deliverability of allocated employment sites, to meet local needs, to justify their long-term protection (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22)?</i>	<p>The remitted parts of the JCS represent only a limited part of the plan as originally adopted. The policies guiding economic development were not remitted. They are, however, based on the spatial vision (also unremitted) which includes a section on “Working and getting around”. This is translated into objectives dealing with economic growth and diversity and the provision of a range of jobs; and the promotion of regeneration and reduction of deprivation. These in turn translate to a specific policy on the economy. This is supported in the policies dealing with strategic locations for growth, and other policies relating to the settlement hierarchy.</p> <p>There are only two parts of the remitted sections of the plan to which this requirement is directly relevant. The first is the location of 25 hectares of additional employment land. This has been proposed for location at</p>	There is not considered to be any conflict with the NPPF

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		<p>Rackheath, expanding an existing employment area (as in the remitted plan), and in support of the housing proposed in the same area. The second relevant issue is taking proper account of the need to protect employment land within the urban area in assessing its potential capacity for housing.</p> <p>As part of the definition of the reasonable alternatives for the tradition of the remitted 9000 dwellings in the Broadland part of the Norwich policy area, there has been a re-examination of the capacity within the Norwich City Council area. This has been based on work undertaken for Norwich City Council's site allocations plan, and has included an assessment of the suitability of sites currently in employment use or protected for such use. This assessment has included consideration of the potential to accommodate some of the housing requirements, either through re-allocation, or through the promotion of mixed use developments, and also their suitability for continued reservation for employment development</p> <p>In both respects, the remitted parts of the plan are considered fully compliant with the NPPF.</p>	
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2. Ensuring the vitality of town centres (paras 23-27)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
Set out policies for the management and growth of centres over the plan period (23).	<p><i>Have you undertaken an assessment of the need to expand your town centre, considering the needs of town centre uses?</i></p> <p><i>Have you identified primary and secondary shopping frontages?</i></p>	<p>The remitted parts of the JCS represent only a limited part of the plan as originally adopted. Policies protecting town centre uses are not affected, but the JCS adopted spatial vision includes recognition of the need to maintain a vibrant network of accessible district and local centres within the urban area of Norwich as well as the role of rural settlements acting as centres serving the surrounding areas. This is supplemented by an objective to make sure people have ready access to services, together with a policy identifying the specific service centre hierarchy (policy 19). Policies were based on an assessment of the potential to expand retail provision and a separate study looking at future economic prospects. A detailed infrastructure study embraced the need for social and community infrastructure to support housing growth, and this is reflected in the JCS policies.</p>	<p>There is not considered to be any conflict with the NPPF.</p>

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		<p>Within the remitted text there is a proposal for the establishment of a district centre to serve the major new mixed-use development in the North East Growth Triangle, either by provision of a new centre or by expansion of one on the urban edge already supported by existing policy. The potential scale of retail provision which could support this new centre was established through the retail study. The centre is described as “a district centre based around an accessible ‘high street’ and including a new library, education and health facilities”.</p> <p>The potential for these social facilities was established through a detailed infrastructure needs and funding study. The remitted parts of the plan also include specific proposals for a network of local centres to augment the district centre</p>	
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<b>3. Supporting a prosperous rural economy (para 28)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p>Policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development (28).</p>	<p><i>Do your policies align with the objectives of para 28?</i></p>	<p>The remitted parts of the JCS represent only a limited part of the plan as originally adopted.</p> <p>The remitted parts of the plan are specifically concerned with the distribution of housing and related development within the Norwich policy area, rather than the rural parts of the plan area. Policies supporting these were not remitted.</p> <p>While the objectives of paragraph 28 of the NPPF are supported by other parts of the plan, they are not directly relevant to the remitted sections.</p> <p>The parts of the plan which remain adopted include policies guiding appropriate levels of development (residential and business) at different levels of the settlement hierarchy (main towns, key service centres, service villages and other villages) appropriate to their scale. There is also a policy covering smaller rural communities and the countryside</p>	<p>There is not considered to be any conflict with the NPPF.</p>



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		supporting appropriate activity(farm etc diversification, rural tourism/leisure, or enterprises with justification for a rural location)	
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4. Promoting sustainable transport (paras 29-41)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Policies that facilitate sustainable development but also contribute to wider sustainability and health objectives (29).</p> <p>Different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas (29).</p>	<p><i>If local (car parking) standards have been prepared, are they justified and necessary? (39) (The cancellation of PPG13 removes the maximum standards for major non-residential development set out in Annex D. PPS4 allowed for non-residential standards to be set locally with Annex D being the default position. There is no longer a requirement to set non-residential parking standards as a maximum but that does not preclude lpas from doing so if justified by local circumstances).</i></p> <p>Has it taken into account how this relates to other policies set out elsewhere in the Framework, particularly in rural areas? (34).</p> <p><i>Have you worked with adjoining authorities and transport providers on the provision of viable infrastructure?</i></p>	<p>The JCS does not set parking standards. This will be achieved through subsequent local plan documents prepared by the individual local planning authorities.</p> <p>The integration of land-use and transportation strategies has been achieved through joint working by means of a partnership of the three local planning authorities and the county council as transport authority. This has enabled the core strategy policies to be fully integrated with the Norwich Area Transportation Strategy proposals.</p> <p>The proposals in the remitted parts of the plan are entirely consistent with the Norwich Area Transportation Strategy and its implementation plan. The partners continue to work together on Community Infrastructure Levy and related infrastructure planning. In particular, specific proposals integrate the proposed development with the bus rapid transit connections to Norwich city centre, other public transport</p>	<p>There is not considered to be any conflict with the NPPF.</p>

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		<p>improvements and improved cycling links to the city and to nearby employment areas. The detail of the development proposed will be established through an area action plan or other local plan document, but the broad character as described in the remitted plan specifically includes the requirement for facilities and services (and the surrounding countryside) to be readily accessible on foot and cycle.</p> <p>One key element of transport infrastructure critical to the remitted proposals is the Northern Distributor Road. Funding for this was confirmed at the end of 2011. The detailed design includes specific measures to improve cycle connections from Rackheath to the Broadland Business Park, and also includes a pedestrian/cycle bridge crossing the NDR immediately adjacent to established residential area of Rackheath.</p>	
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<b>5.Supporting high quality communications infrastructure (paras 42-46)</b>			
<p>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</p>		<p>Although there are no new or significantly different specific requirements in the NPPF, the JCS includes in policy 6 specific support for IT links, telecommunications and promotion of home working. The supporting text highlights the importance of broadband and telecommunications improvements, and local authorities across Norfolk are working together to achieve this. In this respect it is worth noting that, on 17 September 2012, Norfolk County Council agreed to appoint BT as preferred supplier to deliver broadband infrastructure to ensure the whole of Norfolk can benefit from a minimum of 2Mbps download speed by 2015.</p> <p>There is no direct connection with the remitted parts of the plan</p>	<p>There is not considered to be any conflict with the NPPF.</p>

6. Delivering a wide choice of high quality homes (paras 47-55)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of <i>5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land (47).</i></p>	<p><i>What is your record of housing delivery?</i></p> <p><i>Have you identified:</i></p> <p>a) five years or more supply of specific deliverable sites;  <i>b) an additional buffer of 5% (moved forward from later in the plan period), or</i>  <i>c) If there has been a record of persistent under delivery have you identified a buffer of 20% (moved forward from later in the plan period)? [Para 47].</i></p> <p><i>Does this element of housing supply include windfall sites; if so, to what extent is there 'compelling evidence' to justify their inclusion (48)?</i></p>	<p>At present there is not a five year supply of readily identifiable housing land in the Norwich policy area (the supply has been 3.76; 4.24; 3.28 years in the period 2008/09 to 2010/11 These calculations do not include any assumptions about future windfalls)</p> <p>The principal reasons for this shortfall are the recession which has depressed completion rates, reducing forecast supply in the next 5 years from specific currently committed sites and increasing the residual requirements for the rest of the plan period. This has been compounded by the need to develop a planning strategy to deliver the higher rates of development required by the East of England Plan (compared to previous requirements) which has increased the annual requirement. The JCS is critical to achieve this objective. Re submission of the remitted plan is directed specifically towards achieving this objective.</p>	<p>The JCS is directed towards achieving this requirement. Because it is not site-specific, it cannot fully address the requirements to establish a 5 year land supply, but will be instrumental in identifying the scale of development required and thus the targets to be attained.</p>

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		<p>Looking towards future delivery, there is considerable developer interest in the area affected by the remitted parts of the plan. In particular, there are two co-ordinated approaches in the northern and eastern parts of the NEGT, and a group of landowners engaging positively with the plan-making process in the southern part of the NEGT. It is of particular note that an outline planning application for up to 3500 new dwellings (as part of a mixed-use development) in the NEGT was submitted in October 2012. This gives confidence that the required dwellings can be delivered, subject to a sufficiently buoyant market.</p> <p>Elsewhere in the Broadland part of the Norwich Policy Area affected by the remittal, a number of sites were actively promoted through the early stages of the Broadland site allocations plan. Once the JCS is readopted, it will give sufficient certainty for work to progress on identifying specific allocations.</p> <p>The JCS sets the quantum of growth to be achieved to meet objectively assessed needs. It does not specifically allocate sites. That work will fall to subsequent local plan documents.</p>	
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		<p>This is evident from Policy 9 which states “Housing need will be addressed by the identification of new allocations to deliver a minimum of 21,000 dwellings”. These are distributed to a number of locations, two of which lie at the heart of the remitted parts of the plan.</p> <p>These two locations are: (a) 7000 dwellings by 2026, continuing to grow to around 10,000 dwellings eventually, in the North East Growth Triangle, and (b) 2000 dwellings on smaller sites in the Broadland NPA. The policy goes on to clearly state that all numbers show the minimum number of dwellings to be delivered in each location.</p> <p>Consideration of the precise scale of allocations required to achieve these will be undertaken through site allocations work.</p> <p>Past windfalls were taken into account in establishing the residual requirements to be achieved in order to meet requirements of the East of England Plan. No reduction for future windfalls was made in deriving these targets.</p> <p>The toolkit invites comments on future windfalls. This will be addressed in the local plans dealing with site allocations. The reference</p>	
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		<p>in paragraph 48 of the NPPF is relevant to the assessment of a five year supply rather than the overall quantum of development to be planned for.</p> <p>JCS housing policies were supported by a Strategic Housing Market Assessment, and reviews of the SHMA. These indicate an appropriate balance of housing, including the need for affordable housing. The policies regarding the latter were refined in the light of viability evidence.</p> <p>Further evidence on the future need for housing with care is also reflected in the JCS.</p>	
<p>Illustrate the expected rate of housing delivery through a trajectory and set out a housing implementation strategy describing how a five year supply will be maintained (47).</p>	<p><i>To what extent does the removal of national and regional brownfield targets have an impact on housing land supply?</i></p>	<p>The remitted parts of the plan include three rows from a trajectory. The trajectory as a whole had previously been examined and accepted as a reasonable assumption of what could be delivered if the market was sufficiently buoyant.</p> <p>As part of the reconsideration of the remitted parts of the JCS, the trajectory has been re-examined to confirm that the total quantum of growth can be delivered, providing the housing market returns to a sufficiently buoyant condition. This is not affected by the removal of</p>	<p>There is not considered to be any conflict with the NPPF.</p>



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		<p>national or regional previously-developed land targets. The overall strategy includes significant numbers of greenfield allocations, but only to the extent this is required to meet the overall quantum of growth. The overall strategy remains based upon utilising opportunities in the urban area (where most brownfield opportunities lie) as far as is consistent with environmental considerations, and the need to accommodate other uses.</p>	
<p>Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50), and caters for housing demand and the scale of housing supply to meet this demand (para 159)</p>	<p><i>Does the plan include policies requiring affordable housing? Do these need to be reviewed in the light of removal of the national minimum threshold? Is your evidence for housing provision based on up to date, objectively assessed needs</i></p>	<p>The remitted parts of the JCS represent only a limited part of the plan as originally adopted. Affordable housing policies remain adopted. The overall quantum of development was established by the East of England Plan, but has been confirmed by a housing market assessment, whose key outcomes were refreshed in 2010 and 2011. This policy specifically requires a proportion of affordable housing derived from the housing market assessment, appropriate provision for Gypsies and travellers, and a mix of housing which reflects the findings of the most recent housing market assessment. The remitted parts of the JCS include the overall provision to be made in the Broadland part of the NPA, and an expectation that the major growth location in the JCS as originally adopted would include</p>	<p>There is not considered to be any conflict with the NPPF.</p>

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		<p>specific provision for mixed tenure housing with care. This was based on advice from Adult Social Services (Norfolk County Council).</p>	
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p>	<p><i>Have you considered whether your plan needs a policy which allows some market housing to facilitate the provision of significant additional affordable housing to meet local needs?</i></p>	<p>The remitted parts of the JCS represent only a limited part of the plan as originally adopted. These are entirely focused on the Norwich Policy Area.</p> <p>Policy 4 remains adopted, and includes provision for rural exceptions sites. The precise arrangements for delivery will be dealt with by “daughter” local plan documents. The policy and relevant supporting text ( Para 5.32) do not specifically provide for cross subsidy by market-housing, and it would be necessary for this to be addressed in future local plan documents.</p>	<p>There is not considered to be any fundamental conflict with the NPPF, although future local plan documents will need to consider the issue of cross subsidy on rural exceptions sites.</p>
	<p><i>Have you considered the case for setting out policies to resist inappropriate development of residential gardens? (This is discretionary)(para 53)</i></p>	<p>The remitted parts of the JCS represent only a limited part of the plan as originally adopted.</p> <p>Policy 2 (Promoting good design) remains adopted, but includes requirements for development proposals to respect local distinctiveness including, where appropriate “ townscape.....and the</p>	<p>There is not considered to be any conflict with the NPPF. While policies do not specifically address residential gardens, the design policies are in line with the aims of the NPPF</p>

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		<p>varied character of our market towns and villages” and indicates that residential development of 10 or more units will be evaluated against the Building for Life criteria published by CABE, or any successor to it.</p>	
<p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<p><i>Examples of special circumstances to allow new isolated homes listed at para 55 (note, previous requirement about requiring economic use first has gone).</i></p>	<p>The remitted parts of the JCS represent only a limited part of the plan as originally adopted. The remitted parts relates to the distribution of housing and associated development within the Broadland part of the NPA, and do not extend to the more rural parts of the JCS area.</p> <p>The policy dealing with smaller rural communities and the countryside (policy 17) allows for exceptions sites, and in addition gives policy support for proposals relating to farm diversification, home working, leisure and tourism facilities. Within defined rural settlements, policies 13, 14, 15 and 16 (which remain adopted), provide for new housing and commercial development of an appropriate scale to the settlement in question</p> <p>The issue of individual homes of exceptional design is not explicitly addressed in the JCS. It would more appropriately be addressed in district Local Plans (if judged appropriate)</p>	<p>There is not considered to be any conflict with the NPPF. While there is no specific policy support for “exceptional” individual homes in the countryside, para 55 of the NPPF would remain a material consideration. In this regard, the requirements of the NPPF are not considered materially different from those of previous government policy on the issue which were extant when the JCS was found to be sound.</p>

<b>7. Requiring good design (paras 56-68)</b>			
<p>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</p>		<p>The remitted parts of the JCS represent only a limited part of the plan as originally adopted.</p> <p>Policy2 (Promoting good design) remains adopted</p>	<p>There is not considered to be any conflict with the NPPF.</p>

<b>8. Promoting healthy communities (paras 69-78)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<i>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</i>	<i>Does the plan include a policy or policies addressing community facilities and local services? To what extent do policies plan positively for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure?</i>	<p>The remitted parts of the JCS represent only a limited part of the plan as originally adopted. The JCS contains policies on "Supporting communities" (policy 7) and "Culture, leisure and entertainment" (policy 8). These are both unaffected by the Order of the High Court and remain adopted.</p> <p>Between them, they cover the topics of health, (including health impact assessment) crime, education, community infrastructure and cohesion, cultural heritage, and the provision of local cultural and leisure activities through new development. The supporting text to policy 7 specifically encourages joint working.</p> <p>The settlement hierarchy relates new housing provision to the availability of facilities, and the strategy for growth in the Norwich policy area (parts of which are remitted) relates new housing and employment development, and links both to transport infrastructure, including</p>	There is not considered to be any conflict with the NPPF.

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		<p>public transport, walking and cycling.</p> <p>The policy governing major new or expanded communities in the NPA lies at the heart of the parts of the plan remitted by the court order. This policy specifically seeks the provision of attractive, well serviced, integrated, mixed use development which provides for sustainable communities with a high level of self-containment through the provision of services. This is spelled out in more detail for each location, including the proposal embodied in the plan as adopted in March 2011 for the "Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle". (policy 10) and currently proposed for re-submission</p>	
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<p><i>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</i></p>	<p><i>Do you have a policy which would enable the protection of Local Green Spaces and manage any development within it in a manner consistent with policy for Green Belts? (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77).</i></p>	<p>Neighbourhood planning is open to all communities which choose to undertake it.</p> <p>The remitted parts of the JCS represent only a limited part of the plan as originally adopted.</p> <p>Policy 1 deals with the protection of environmental assets. Policy 9 specifically seeks protection and enhancement of cultural and leisure assets. Both these policies remain adopted.</p> <p>The parts of the JCS which were remitted deal with the distribution of new development, and in the case of strategic housing locations, a broad indication of the nature of the development. In the case of the remitted parts of the JCS relating to the growth triangle there is a specific requirement for the retention of existing important greenspaces, and for heathland recreation providing stepping stones linking Mousehold Heath to the surrounding countryside. There is also a requirement for the restoration and conservation of historic parkland and important woodland.</p>	<p>There is not considered to be any conflict with the NPPF</p>
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9. Protecting Green Belt land (paras 79-92)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances (82)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy (83).</p> <p>Boundaries should be set using 'physical features likely to be permanent' amongst other things (85)</p>	<p>If you are including Green Belt policies in your plan, do they accurately reflect the NPPF policy?</p> <p>For example:</p> <p>Lpas should plan positively to enhance the beneficial use of the Green Belt. <i>Beneficial uses are listed in para 81.</i> PPG2 set out that 'Green Belts have a positive role to play in fulfilling objectives. Para 1.6 of PPG2 set out the objectives – some of these have been rephrased/ amended and 'to retain land in agricultural, forestry and related uses' has been omitted.</p> <p>Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development (85).</p>	<p>There is no formally designated green belt in Norfolk, and therefore these requirements are not relevant in this instance</p>	<p>There is not considered to be any conflict with the NPPF</p>



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	<p>Does it allow for the extension or alteration of a <i>building</i>, provided that it does not result in disproportionate additions over and above the size of the original building? (89). <i>PPG2 previously referred to dwelling. Original building is defined in the Glossary.</i></p> <p>Does it allow for the replacement of a <i>building</i>, <i>provided the new building is in the same use and not materially larger than the one it replaces?</i> (89) <i>PPG2 did not have a separate bullet point – replacement related to dwellings rather than buildings.</i></p> <p><i>Does it allow for limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land) whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development? (89)</i> (PPG2 referred to 'major existing developed sites')</p>		
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	<p>Change from 'Park and Ride' in PPG2 to <i>local transport infrastructure</i> and the inclusion of '<i>development brought forward under a Community Right to Build Order</i>' in relation to other forms of development that are not inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. (90).</p>		
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<b>10. Meeting the challenge of climate change flooding and coastal change (paras 93-108)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p><i>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations (94).</i></p>	<p><i>Have you planned new development in locations and ways which reduce greenhouse gas emissions?</i></p> <p><i>Does your plan actively support energy efficiency improvements to existing buildings?</i></p> <p><i>When setting any local requirement for a building's sustainability, have you done so in a way that is consistent with the Government's zero carbon buildings policy and adopt nationally described standards? (95)</i></p>	<p>The JCS seeks to plan new development in locations which reduce greenhouse gases as a consequence of travel, by locating housing development in proximity to employment locations, and where possible accessible to a choice of such locations by public transport, walking and/or cycling. The scale of provision in strategic locations is intended to support the potential for renewable and low carbon energy solutions. Policy 1 ( "Addressing climate change and protecting environmental assets") requires energy efficiency, provision for recycling, locations chosen to minimise flood-risk (and where unavoidable, mitigate it), minimise water use and protect groundwater sources, be designed to mitigate or be adapted to the urban heat island effect of the leads Norwich and improve the resilience of ecosystems to environmental change. There is a specific policy (policy 3) on energy and water efficiency, responding to the potential for energy efficiency and taking account of the fact that the Norwich area is an area of relative</p>	<p>There is not considered to be any conflict with the NPPF. Indeed the remitted proposals were specifically designed with the NPPF's considerations in mind</p>

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		<p>water stress.</p> <p>These requirements are expressed in terms of the Code for Sustainable Homes.</p> <p>While these policies remain adopted, the remitted parts of the plan are fully aligned with them. In particular the rationale behind the remitted proposal for major growth north east of Norwich rested heavily on sustainable transport links connecting it to the city of Norwich, to strategic employment locations as well as walking/cycling links to local facilities and employment. The scale of the proposal is specifically designed to support a wide range of facilities, thereby promoting a walkable community. It also specifically seeks to contribute towards the establishment of strategic green infrastructure corridors connecting areas of environmental significance which would support priorities identified in the Greater Norwich Green Infrastructure delivery plan</p>	
<p>Help increase the use and supply of renewable and low carbon energy (97).</p>	<p><i>Do you have a positive strategy to promote energy from renewable and low carbon sources?</i></p> <p><i>Have you considered identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where</i></p>	<p>Yes, policy 3 is directed to this end.</p> <p>The JCS does not identify specific areas for renewable and low carbon energy sources</p>	<p>The omission of the identification of specific areas for renewable and low carbon energy sources is not considered to seriously detract from the plan, as most renewable energy installations are likely to be a consequence of large scale development and related to these. Policy 3 includes an expectation that</p>

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	<i>this would help secure the development of such sources (see also NPPF footnote 17)</i>		other DPDs/Local Plans will allocate land for renewable energy development.
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11. Conserving and enhancing the natural environment (paras 109-125)			
What NPPF expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what NPPF expects	Does your local plan address this issue and meet the NPPF's expectations?	How significant are any differences? Do they affect your overall strategy?
<p>Planning policies should minimise impacts on biodiversity and geodiversity (para 117).</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority boundaries (117).</p>	<p><i>If you have identified Nature Improvement Areas, have you considered specifying the types of development that may be appropriate in these areas (para 117)?</i></p>	<p>Policy 1 (“Addressing climate change and protecting environmental assets”) requires development and investment to seek to expand and link valuable open spaces and areas of biodiversity to create green networks. Developments are expected to provide for sufficient and appropriate local green infrastructure, and specifically to</p> <ul style="list-style-type: none"> <li>• minimise fragmentation of habitats</li> <li>• Contribute to providing a multifunctional green infrastructure network, including provision of areas of open space, wildlife resources and links between them, both offsite and as an integral part of the development.</li> </ul> <p>This aspect of the policy is supported by diagrams illustrating biodiversity enhancement areas and the proposed green infrastructure network. These in turn were based on research undertaken jointly with</p>	<p>There is not considered to be any conflict with the NPPF</p>

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		<p>ecological interests and reflected in a green infrastructure implementation strategy.</p> <p>There are a series of monitoring targets, including some dealing with spatial planning objective 9, concerned with protection management and enhancement of the natural, built and historic environment. These include indicators relating to local biodiversity importance, quality of rivers and condition of SSSIs.</p> <p>The supporting text to policy 1 specifically includes geodiversity among the area's environmental assets (para.5.4).</p> <p>The remitted parts of the JCS are considered to be entirely consistent with these objectives.</p>	
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<b>12. Conserving and enhancing the historic environment (paras 126 – 141)</b>			
<p>There are no new or significantly different requirements for the policy content of local plans in this section of the NPPF.</p>		<p>Whilst there is no specific policy addressing the historic environment in the JCS, there are many mentions of the historic environment throughout the objectives and policies of the JCS (for instance, Policy 2 states that landscape character and the historic environment will be respected in the promotion of good design).</p> <p>The JCS was previously found sound at public examination, and the very limited areas of remittal do not include historic environment considerations</p>	<p>There is not considered to be any conflict with the NPPF</p>



<b>13. Facilitating the sustainable use of minerals (paras 142-149)</b>			
<b>What NPPF expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what NPPF expects</b>	<b>Does your local plan address this issue and meet the NPPF's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p>It is important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142).</p>	<p><i>Does the plan have policies for the selection of sites for future peat extraction? (143) (NPPF removes the requirement to have a criteria based policy as peat extraction is not supported nationally over the longer term).</i></p>	<p>The JCS does not specifically include minerals policies as none of the local planning authorities responsible for its adoption are minerals planning authorities.</p> <p>While the remitted parts of the plan did not specifically relate to minerals, in areas not otherwise protected through international or national designations, development is required by policy 1 to, inter alia, “protect mineral and other natural resources identified through the Norfolk minerals and waste development framework”.</p> <p>In the case of major developments, therefore this will generally be through a process of investigating any mineral resources in the area and securing prior extraction where practicable</p>	<p>There is not considered to be any conflict with the NPPF</p>

## Planning policy for traveller sites

The CLG 'Planning policy for traveller sites' was published on 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. 'Planning policy for travellers sites' should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers which respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (lpas) make their own assessment of need for the purposes of planning
- That lpas work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green Belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

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<b>Policy A: Using evidence to plan positively and manage development (para 6)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
Early and effective community engagement with both settled and traveller communities.	Has your evidence been developed having undertaken early and effective engagement including discussing travellers accommodation needs with travellers themselves, their representative bodies and local support groups?	<p>The remitted parts of the plan are not directly relevant to this consideration.</p> <p>The initial requirement for new pitches was taken from the East of England plan which embodied a focused alteration specifically setting targets by locality for the provision of new Gypsy and traveller sites. The evidence was prepared in association with Gypsy and traveller representatives. However, in anticipation of the eventual abolition of regional strategies, the policy concerned (policy 4) includes a requirement that future provision will be based on local evidence. Appropriate evidence gathering has recently been undertaken and has included dialogue with Gypsy and traveller interests including directly with the Gypsy and traveller communities, and with those of travelling show people.</p>	There is not considered to be any conflict with the NPPF

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<p>Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.</p>	<p>Can you demonstrate that you have a clear understanding of the needs of the traveller community over the lifespan of your development plan?</p> <p><b>Have you worked collaboratively with neighbouring local planning authorities?</b></p> <p>Have you used a robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions?</p>	<p>The remitted parts of the plan are not directly relevant to this consideration.</p> <p>It is difficult to answer this in the affirmative, because the needs of the travelling communities are difficult to predict so far ahead. Instead there is an intention to update research as part of regular housing markets assessments and act upon it. The research outlined above has been undertaken collaboratively with neighbouring authorities, with Gypsy and Traveller Accommodation Assessments including the need for transit pitches, and Housing Market Assessments across the greater Norwich area.</p>	<p>There is not considered to be any conflict with the NPPF</p>
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<b>Policy B: Planning for traveller sites (paras 7-11)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring Ipas (8)	Have you identified, and do you update annually, a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set targets? Have you identified a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. (9)	The remitted parts of the plan are not directly relevant to this consideration.  The JCS is not site specific, but sets the quantum of development to be met in site-specific daughter local plan documents	There is not considered to be any conflict with the NPPF
Consider the production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites.	Have you identified constraints within your local area which prevent you from allocating sufficient sites to meet likely future need? If so have you prepared a joint development plan or do you intend to do so? Is the reason for this clearly explained?	The remitted parts of the plan are not directly relevant to this consideration.  The JCS has been prepared jointly. The housing market assessment which will be used to derive future targets is being commissioned across the greater Norwich area. The specific research which has been undertaken to identify future Gypsy and traveller needs has also been undertaken across greater Norwich	There is not considered to be any conflict with the NPPF

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<p>Relate the number of pitches and plots to the circumstances of the specific size and location of the site and the surrounding population size and density.</p>		<p>The remitted parts of the plan are not directly relevant to this consideration.</p> <p>The JCS is not site specific. However the policy (policy 4) includes an expectation that sites will not generally have more than 10 to 12 pitches, though it acknowledges this may be varied according to circumstances. The sites are to be provided in locations with good access to services and where local research demonstrates they would meet the needs of the communities in question. These requirements are intended to recognise the fact that Gypsies and travellers are not a homogenous community but that different groups have different needs and wishes</p>	<p>There is not considered to be any conflict with the NPPF</p>
<p>Protect local amenity and environment.</p>		<p>The remitted parts of the plan are not directly relevant to this consideration.</p> <p>The need for protection of amenity and the environment applies no less to Gypsy and traveller sites than any other category of development. There is no specific policy requirement, but the general policy requirements protecting the environment and local amenity will apply.</p>	<p>Although there are no specific environmental considerations within the policy content relating to gypsies and travelers, general considerations would apply. therefore there is not considered to be any conflict with the NPPF</p>

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<p>Set criteria to guide land supply allocations where there is identified need.</p>	<p>Has an up-to-date assessment of the need for traveller sites been carried out? If an unmet need has been demonstrated has a supply of specific, deliverable sites been identified based on the criteria you have set? Where there is no identified need, have criteria been included in case applications nevertheless come forward?</p>	<p>The remitted parts of the plan are not directly relevant to this consideration</p> <p>At present, the requirement for pitches is guided by the East of England Plan and the extrapolation formula included within it. Nevertheless in anticipation of the government's stated intention to rescind regional strategies, updated local evidence has been produced. This will need to be used to inform site allocations plans.</p> <p>There is no specific criteria based policy in the JCS, as this would be more appropriate in a development management planning document. These are being prepared by individual local planning authorities</p>	<p>There is not considered to be any conflict with the NPPF</p>
<p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<p>Have your policies been developed taking into account criteria a-h of para 11 of the policy</p>	<p>The remitted parts of the plan are not directly relevant to this consideration.</p> <p>Policies in the JCS predate the government policy statement, but are broadly compatible. There is a requirement that the sites should be provided in locations which have good access to services, and an expectation that some of the provision will be met in association with large-scale strategic housing growth to ensure appropriate access to facilities.</p>	<p>There is not considered to be any conflict with the NPPF</p>

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<b>Policy C: Sites in rural areas and the countryside (para 12)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
When assessing the suitability of sites in rural or semi-rural settings lpas should ensure that the scale of such sites do not dominate the nearest settled community?		<p>The remitted parts of the JCS represent only a limited part of the plan as originally adopted. This focuses on the distribution of housing within the Broadland part of the Norwich policy area rather than the rural parts of the plan area.</p> <p>However the relevant policy includes an expectation that sites should not normally contain more than 10 to 12 pitches, so that the overall requirement is met in a number of locations reflecting not only the character of the area, but also the fact that the Gypsy and traveller communities are not homogeneous and have different needs and wishes</p>	There is not considered to be any conflict with the NPPF



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<b>Policy D: Rural exception sites (para 13)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
<p>If there is a lack of affordable land to meet local traveller needs, lpas in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable travellers sites.</p>	<p>If you have a lack of affordable land to meet local traveller needs in your rural area have you used a rural exception site policy, and if so, does it make it clear that such sites shall be used for affordable traveller sites <b>in perpetuity?</b></p>	<p>The potential for accommodating some of the need for gypsy and traveller accommodation on exceptions sites is not specifically addressed, although the potential for some such sites to be managed by housing associations, who frequently manage exceptions sites is referred to in the supporting text to policy 4</p>	<p>This issue is not specifically addressed, although it is not specifically excluded from consideration. Therefore, there is not considered to be any fundamental conflict with the NPPF, and other local plan documents could clarify this issue.</p>

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<b>Policy E: Traveller sites in Green Belt (paras 14-15)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.	Have you made an exceptional limited alteration to the defined Green Belt boundary to meet a specific, identified need for a traveller site? Has this alteration been done through the plan-making process and is it specifically allocated in the development plan as a traveller site only	There is no greenbelt land in Norfolk, and therefore this requirement is not directly relevant.	There is not considered to be any conflict with the NPPF

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Policy F: Mixed planning use traveller sites (paras 16-18)			
What the policy for traveller sites expects local plans to include to deliver its objectives	Questions to help understand whether your local plan includes what the policy expects	Does your local plan meet the policy's expectations?	How significant are any differences? Do they affect your overall strategy?
	<p>Have you considered including travellers sites suitable for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents)?</p> <p>If mixed sites are not practicable have you considered the scope for identifying separate sites for residential and for business purposes in close proximity to one another?</p> <p>Have you had regard to the need that travelling showpeople have for mixed-use yards to allow residential accommodation and space for storage of equipment?</p> <p><b>NB Mixed use should not be permitted on rural exception sites</b></p>	<p>This issue is not directly relevant to the remitted parts of the plan.</p> <p>This issue is not specifically addressed in the JCS</p>	<p>This issue would need to be addressed in other local plan documents. However, it is considered that this could be so addressed and does not fundamentally undermine the JCS.</p>

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<b>Policy G: Major development projects (para 19)</b>			
<b>What the policy for traveller sites expects local plans to include to deliver its objectives</b>	<b>Questions to help understand whether your local plan includes what the policy expects</b>	<b>Does your local plan meet the policy's expectations?</b>	<b>How significant are any differences? Do they affect your overall strategy?</b>
	Do you have a major development proposal which requires the permanent or temporary relocation of a traveller site? If so has a site or sites suitable for the relocation of the community been identified (if the original site is authorised)?	<p>This issue is not directly relevant to the remitted parts of the JCS.</p> <p>The JCS is not site specific, however there is no known such proposal</p>	There is not considered to be any conflict with the NPPF

## Plan-making

Local Plans (paras 150-157)			
What NPPF identifies in relation to the development of local plans	Questions to help understand whether your local plan includes what NPPF expects	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
Each local planning authority should produce a Local Plan for its area. Any additional DPDs should only be used where clearly justified. SPDs should be used where they help applicants make successful applications/aid infrastructure delivery/not be used to add unnecessarily to financial burdens on development (153)	<i>Are you able to clearly justify the use of additional DPDs if this is the approach that you are pursuing?</i>	The JCS stands as a separate document because it spans local planning authorities. It is for each local planning authority to consider how other local plan documents should be prepared	There is not considered to be any conflict with the NPPF
<b>Local Plans should:</b> <ul style="list-style-type: none"> <li>Plan positively (para 157)</li> </ul>	<i>Have you objectively assessed development needs and planned for them? If you can't meet them in your area, have you co-operated with others on meeting them elsewhere? (para 182)</i>	Development needs have been objectively assessed in terms of housing, employment and retail, and also in terms of the infrastructure necessary to support the provision in a sustainable way.  The JCS has been prepared by three local planning authorities working in co-operation with the county council to ensure that needs can be met across the area	There is not considered to be any conflict with the NPPF

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Using a proportionate evidence base (paras 158-177)			
What NPPF identifies in relation to the development of local plans	Questions to help understand whether your local plan includes what NPPF expects	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
<b>Defence, national security, counter-terrorism and resilience</b>	See para 163	<p>This issue is not considered directly relevant to the remitted parts of the plan.</p> <p>The issue has not been explicitly addressed in the preparation of the JCS, although there are no significant defence sites, and there are no known issues of the kind described in paragraph 164 of the NPPF</p>	<p>This issue is not specifically addressed and would need to be addressed (if necessary) through subsequent local plan documents.</p> <p>There is no reason to consider that there is any fundamental conflict between the JCS and the NPPF in this regard</p>
<p><b>Ensuring viability and deliverability</b></p> <p>The sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened (173)</p>	<p><i>To what extent has your plan been assessed to ensure viability, taking into account the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements?</i></p> <p><i>In so doing to what extent has it taken into account the normal cost of development and on-site mitigation and provide competitive returns to a willing</i></p>	<p>These issues, including their relevance to the remitted parts of the plan, were examined at a public examination in late 2010. The plan was found to be sound, subject to modifications which have been incorporated. The remitted part of the plan reflects the findings of the inspectors. Subsequent work on CIL has not led to the view that there is any fundamental conflict</p>	<p>There is not considered to be any conflict with the NPPF</p>

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	<i>land owner and willing developer to enable the development to be deliverable (173)?</i>		
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	<p><i>To what extent have the likely cumulative impacts on development in your area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards been assessed to ensure that the cumulative impact of these standards and policies do not put implementation of the development plan at serious risk, and facilitate development throughout the economic cycle (174)?</i></p>	<p>These issues, including their relevance to the remitted parts of the plan, were examined at a public examination in late 2010. The plan was found to be sound, subject to modifications which have been incorporated. The remitted part of the plan reflects the findings of the inspectors. Subsequent work on CIL has not led to the view that there is any fundamental conflict</p>	<p>There is not considered to be any fundamental conflict with the NPPF, although clearly the economic cycle will have an impact on delivery, and its future trajectory is unknown. Certain policies, including the affordable housing requirement, specifically require consideration of viability where it is argued that delivery of the full policy target is not viable</p>
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Examining Local Plans (para 182)			
What NPPF identifies in relation to the development of local plans	Questions to help understand whether your local plan includes what NPPF expects	Which parts of your local plan address this issue (reference and brief summary of content, plus any other relevant evidence)	Does your local plan meet the NPPF's expectations? How significant are any differences?
Authorities should submit a plan for examination which it considers is sound, including being ....	<i>Positively prepared</i>	<p>The JCS was subject to an examination in 2010 and found to be sound, including the remitted parts. Sessions of this examination specifically focused on the issues of deliverability.</p> <p>The plan has been prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including the requirements from all the authorities concerned across boundaries where it is reasonable to do so and consistent with achieving sustainable development</p>	There is not considered to be any conflict with the NPPF