



The Planning
Inspectorate

Report to the Greater Norwich Development Partnership [Broadland District Council, Norwich City Council, South Norfolk Council and Norfolk County Council]

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Inspectors appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004, SECTION 20

**REPORT ON THE EXAMINATION OF THE JOINT CORE STRATEGY FOR
BROADLAND, NORWICH & SOUTH NORFOLK DEVELOPMENT PLAN
DOCUMENT**

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ABBREVIATIONS USED IN THIS REPORT

AA	Appropriate Assessment
AAP	Area Action Plan
AH	Affordable Housing
AMR	Annual Monitoring Report
AWS	Anglian Water Services
BCR	Benefit to Cost Ratio
BRT	Bus Rapid Transit
CABE	Commission for Architecture & the Built Environment
CBR	Core Bus Route
CIF	Community Infrastructure Fund
CIL	Community Infrastructure Levy
CSH	Code for Sustainable Homes
DCLG	Department for Communities & Local Government
DfT	Department for Transport
DJD	Drivers Jonas Deloitte
DPD	Development Plan Document
EEP	East of England Plan
EPIC	East of England Production Innovation Centre
EUV	Established Use Value
FC	Focussed Changes
GI	Green Infrastructure
GNDP	Greater Norwich Development Partnership
HD	Habitats Directive
HGV	Heavy Goods Vehicles
HMA	Housing Market Assessment
IC	Inspectors' Changes
JCS	Joint Core Strategy
KSC	Key Service Centre
LDS	Local Development Scheme
LIPP	Local Infrastructure Plan and Programme
MSBC	Major Scheme Business Case
NATS	Norwich Area Transportation Strategy
NDR	Norwich Northern Distributor Road
NPA	Norwich Policy Area
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
PRA	Primary Retail Area
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SC	Soundness Changes (GNDP)
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SV	Service Village
TP	Topic Paper
UEA	University of East Anglia
WFD	Water Framework Directive

Non-Technical Summary

This report concludes that the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk provides an appropriate basis for the planning of the area over the next 15 years to 2026. Greater Norwich Development Partnership (formed by Broadland District Council, Norwich City Council, South Norfolk Council and Norfolk County Council) has produced sufficient evidence to support the strategy and shown that it has a reasonable chance of delivery.

A limited number of changes are needed to meet legal and statutory requirements. These can be summarised as follows:

- (1) Changes to indicate the overall need for Affordable Housing, set a 33% policy target for larger sites and a tapered requirement for sites of 5-15 homes, indicate the scale of contributions from exceptions sites, refer to recent evidence on viability, commit to site-by-site flexibility if viability is in question, and indicate the required tenure split across the JCS area;
- (2) Changes to demonstrate current JCS conformity with the Regional Spatial Strategy on the provision of sites for Gypsies, travellers and travelling show people, but also indicating that RSS abolition would lead to provision from 2012 being made in accordance with updated local assessments of need;
- (3) An effectiveness change to indicate that the proposals for significant expansion of the employment-related activities at UEA/Norwich Research Park will be taken forward through Development Plan Documents;
- (4) Changes to bring consistency with European Directives on internationally protected sites and policy on nationally protected sites;
- (5) An effectiveness change to remove confusion arising from the diagram on p35 by replacing it with two indicative diagrams on (a) the proposed green infrastructure network and (b) biodiversity enhancement areas;
- (6) A change clarifying the use of the Building for Life Criteria;
- (7) Changes to policy 3 concerning energy, removing parts not justified by a robust evidence base and bringing greater consistency with national policy;
- (8) A package of changes to give the JCS greater resilience in relation to the extent of growth that could occur at North East Norwich if the Northern Distributor Road is delayed or not delivered;
- (9) Changes to clarify that the growth triangle will be the subject of an Area Action Plan and explain the options for a District Centre;
- (10) A package of changes to make the JCS clear and effective with regard to the future operation of the small sites allocations;
- (11) Changes to clarify aspects of the JCS concerning Key Service Centres and Service Villages; and
- (12) Change to make the JCS clear and effective on the provision of infrastructure and introduce a link to the Local Infrastructure Plan and Programme.

Most of the changes recommended in this report were put forward by GNDDP in response to points raised and discussed at the hearings. A smaller number are Inspectors’ changes, which were advertised for written public comment and have been amended to some extent in the light of those comments. The recommended changes do not alter the overall thrust of the JCS.

Introduction

1. This report contains our assessment of the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the JCS is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 (paragraphs 4.51-4.52) makes it clear that a sound DPD must be justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authorities comprising Greater Norwich Development Partnership (GNDP) have submitted what they consider to be a sound plan. The basis for the examination was the published draft JCS (November 2009), submitted in March 2010.
3. Our report deals with the changes necessary to make the JCS sound. These fall into 3 categories, ie Focussed Changes (FC) advertised and submitted by GNDP before the hearings, Soundness Changes (SC) offered by GNDP during the hearings and IC (Inspectors’ Changes). Some of the latter have been amended in the light of comments subsequently made in response to the post-hearings advertisements. The FCs and SCs are set out in Appendix A to this report, the ICs in Appendix B. None of these changes materially alters the overall substance of the JCS or undermines the sustainability appraisal and participatory processes that have been undertaken.
4. GNDP has also put forward a series of minor changes (MC) in the form of factual updates and corrections or other small presentational amendments which improve clarity. Some of these were put forward with the submitted JCS and we treated all but one of these as embedded in it. The exception, concerning the treatment of the North East Norwich Growth Triangle as a strategic allocation, did not meet the description of a ‘minor change’. We therefore asked for the changes concerning this matter to be advertised with any other FCs. However, following this consultation, GNDP resolved not to proceed to submit those of the FCs which related to the growth triangle. Other MCs have been put forward since submission. As none relates to soundness we do not generally refer to them in this report although we endorse GNDP’s view that they improve the JCS. All these minor changes are set out in Appendix C. We are content for GNDP to make any necessary additional minor editorial changes (eg to the numbering of pages, figures, or paragraphs) prior to adoption.

Assessment of Soundness

5. Taking account of the written statements and representations made at the appropriate stages, the contents of the evidence base, and the discussions that took place at the hearings, we have identified 9 main soundness-related issues.

Issue 1 Does the JCS make sound provision for housing growth?

Overall level of housing growth

6. The Joint Core Strategy (JCS) plans for substantial overall growth in housing, amounting to a minimum range of 36,820 - 37,750 in the period 2008-26. This is slightly above the equivalent annualised East of England Plan (EEP) figure of 35,660. The Norwich Policy Area (NPA) would absorb the great bulk of the new homes planned across the 3 Districts (a minimum of 32,847) making it one of the most significant major growth points in the East of England. After the EEP was initially ‘revoked’ by the Secretary of State in summer 2010, we asked GNDP to consider whether or not this would have implications for the level of growth proposed in the JCS. GNDP therefore reviewed the JCS growth proposals, and the evidence base for them, against a range of possible alternative scenarios and sources of evidence identified in paper EiP70. That paper remains a useful commentary on the level of growth in the JCS even though (following the ‘Cala Homes’ judgements) the EEP remains part of the Development Plan, at least unless and until abolished through the Localism Bill.
7. Although some of the reviewed sources suggest a level of provision slightly below the range provided for in the JCS, GNDP considers them likely to underestimate needs. Other sources suggest higher levels of need, some considerably higher than those provided for in the JCS. However, GNDP judges that the latter are based on demographic trends that *‘may be unrealistic and suggest levels of growth that are untenable’* in various ways. Overall, EiP70 recognises that forecasting is not an exact science and concludes that the JCS provision falls well within the indicated range of the sources reviewed. It also concludes that the JCS range for housing remains the appropriate necessary response to likely future need and provides *‘flexibility to deliver on reasonable requirements’*. We find no reason to depart from that conclusion.
8. Even if the EEP is abolished, it is clear that the level of growth planned in the JCS is one that was jointly put forward for inclusion in the EEP by the GNDP authorities themselves. It is not, as some participants would have it, ‘a top-down imposition’. As the foreword to the JCS by the four Leaders states, *‘Over the next two decades the population (of the 3 Districts) will grow, just as it will in every part of the country. This strategy has been drawn up to prepare for this, enabling us to make sure that future demands for homes and jobs are met in ways that are sustainable and do not detract from the unique character of the area. The scale of the challenges is immense, but they cannot be avoided. We do not wish to be the generation of political leaders that allowed growth to take its course. The effort that we have made in drawing up this strategy means that our area can continue to provide homes and opportunities for local people and their families, and that growth will happen in a sustainable way that complements the existing local character.’*
9. The authorities have seized the initiative, risen to the challenges presented by the demographic forecasts for the area, and made a proactive response which recognises the scale of the issues. The JCS sets out a sound long-term strategy for this growth and the GNDP position on this issue is worthy of support.

The housing trajectories and the 5-year supply

10. The two housing trajectories set out at JCS Appendix 6 (for the GNDP and NPA areas respectively) reflect the information set out on the following pages in the tables of delivery rates, including those for the various growth locations (at p111). Both trajectories show that existing commitments (about 14,000) will dominate completions in the earlier years to 2018/19 with the new growth locations coming on stream to deliver the balance of nearly 23,000 from about 2014/15 onwards. Although certain factors could speed or slow the delivery rates of particular sites, this will not necessarily greatly affect the general picture. Overall, it has not been demonstrated that the assumptions in the JCS are an unreliable portrayal of what could occur if market conditions recover, although the speed of actual take-up will be heavily dependent on the rate of economic emergence from recession and the future state of the housing market.
11. Despite the size of the current commitments, the present supply of ‘deliverable’ land in the NPA was shown in the recent appeal decision at Norwich Common, Wymondham to be less than 4 years. Although this is clearly a highly material matter in the determination of planning applications, it does not of itself make the JCS unsound. PPS3 does not specify the particular function of a core strategy in the matter of a 5-year housing land supply, but its logical role is to provide the overall strategic framework for the LDF as a whole, identifying the major growth locations at which specific deliverable sites will be defined in subsequent DPDs and released through the development management process. The JCS appropriately fulfils that role.
12. We do not consider it necessary to build more ‘flexibility’ into the JCS to deal with the current 5-year supply deficit. Bearing in mind the uncertainty caused by current economic conditions, soundness considerations do not require the trajectories to be redrawn to indicate a more generalised build-rate increasing towards the end of the period, as opposed to showing what may indeed be an unrealistic peak in 2016/17 and then falling away.
13. In any case, the hearings provided evidence that (were market conditions to trigger it) there is a prospect of earlier starts than shown in the tables at certain of the major growth locations. It was also apparent that the ‘smaller sites’ allocations, amounting to 2,000 in Broadland and 1,800 in South Norfolk, present opportunities for earlier starts on some sites, a few of which could be quite large. Moreover, the trajectory is an indicative snap-shot and the JCS does not impose any restraint on provision through phasing.
14. The current absence of a 5-year supply of deliverable land therefore does not make it unsound for the JCS to be adopted. The JCS sets a very clear course in terms of identifying new growth locations and already contains sufficient flexibility to allow this issue to be addressed by preparation of early DPDs or by the process of development management, or by a combination of both. The vital task for the GNDP authorities at this stage is to move swiftly on to the next stage of plan-making which will address the merits of specific sites at the identified major growth locations, and their deliverability.

Issue 2 Does the JCS make sound provision for affordable housing (AH)?

15. Prior to (and at) the exploratory meeting we expressed a number of concerns about the soundness of the JCS in relation to AH. Firstly, there was no overall target for the amount of AH to be provided from general needs housing and ‘rural exception’ schemes respectively, nor an indication of the desired split between social rented and intermediate housing. Secondly, the proposal to seek 40% provision of AH on sites of 5 or more dwellings had not been subject to rigorous viability testing as required by PPS3 (para 29) and emphasised by the Blyth Valley judgement. The study for the City of Norwich appraised only 6 sites, all well above the national indicative threshold of 15, let alone the proposed JCS threshold of 5. Viability in the other two Districts was given some consideration in the Infrastructure Needs Study, but the methodology and results were expressed in opaque terms and, like the Norwich study, assumed a high level of grant funding, stressing the criticality of that factor.
16. Following the meeting, a JCS-wide viability study was commissioned from Drivers Jonas Deloitte (DJD). Subsequently, GNDP advertised Focussed Changes 1-4 (FC) to the AH section of policy 4 and its supporting text. These retain the 40% target for sites yielding 16 or more dwellings but introduce a new taper of 30% for sites of 10-15 units and 20% for sites of 5-9. FC1-4 also give a clearer commitment to reducing the proportion of AH units and rebalancing the proposed tenures in cases where it can be demonstrated that site characteristics would render the site unviable in current market conditions.

Need

17. There are substantial methodological difficulties in projecting the need for AH over the long timeframe of the JCS to 2026. FC3 quantifies this at about 11,860 during the period 2008-26, based upon extrapolation from the SHMA assessment in 2006. This equates to just over 33% of the total JCS housing provision over the above timespan. In our view the method adopted by GNDP produces an adequately robust ‘order of magnitude’. We note that another needs assessment is due shortly, although it will be equally difficult to use this for long-term planning since this is not its major purpose. Turning to tenure, a broad split of about 60/40 social rented/intermediate is indicated over the same long-term period.
18. FC3 aims to front-load AH provision on the basis that the short-term need assessed in the SHMA included a substantial backlog which should preferably be made up as soon as possible, broadly on the basis that the short-term snapshot of need equated to some 43% of all completions for the next 5 years (those on qualifying and non-qualifying sites). However, in the final analysis we find a snapshot of this type an unsatisfactory basis for such heavy short-term skewing of a policy aimed at meeting a long-term need of 33% and, viability issues aside, that approach would require developers of schemes of 16 or more to provide more than proportionate contributions to AH needs during the JCS period. On the other hand, it is important that the need for affordable housing and the appropriate balance of tenure mix are regularly reviewed, as indicated in FC3.

AH provision and viability

19. The DJD study modelled over 25,000 residual land valuations using a wide range of inputs including a variety of AH thresholds, percentages, and tenure splits together with ranges of assumptions about factors such as build costs and average sales values. The latter covered a range of market conditions including values from ‘peak’ [2007] to ‘trough’ [2008/9], a range of densities and site sizes, and the availability or otherwise of grant.
20. Plainly, the outputs from the modelling are substantially sensitive to variations in the inputs. The study used a notional 1ha site model with a 100% gross/net development area ratio and assumed that this could be applied pro rata to sites of any size and character, rather than collecting data about a range of ‘real sites’. It also made standard assumptions about (a) the required uplift in land value (15% above established use value (EUV) for brownfield sites and various multiples of EUV for greenfield sites) and (b) the necessary developer’s profit, varying from 17.5% in a strong market to 25% in a weak market. While all of these inputs are individually debatable (and the question of ‘incentivisation’ of landowners is always a problematic issue), we consider them reasonably robust for the purposes of the study.
21. The input figures for developer contributions through S106 and Community Infrastructure Levy (CIL) cover a range of scenarios. The base assumption is a S106 contribution of £7000 payable on all units. Alternative scenarios of CIL contributions of £10,000 and £15,000 payable only on market houses are also modelled. This is more than the average that has been required through S106 contributions in the past but nearer to what has been sought for some large schemes recently. Bearing in mind the Local Infrastructure Plan and Programme (LIPP), which identifies additional ranges of items expected to be funded by developers in future, it is feasible that a base assumption of £7000 could prove to be an underestimate of the level of future requirements. However, the figure is probably robust for present purposes.
22. More significant is the modelled assumption concerning building sustainability requirements. The study’s base assumption is for private units to comply with current Building Regulations and AH units to achieve Code for Sustainable Homes level 3 (CSH3). Sensitivity testing, based on research for the Department of Communities and Local Government (DCLG) in March 2010, showed that CSH4 is broadly achievable but that CSH5, with 40% AH, could only be achieved in a small number of scenarios. CSH6 (which the submitted version of policy 3 sought to reach by 2015) was not modelled but would make AH even more rarely achievable if reliance continues to be placed on the present mixed funding cross-subsidy model. As acknowledged by GNPD, there is a substantial potential clash between the desire to continue using the planning system to produce affordable housing and the cost implications of providing CSH6 housing, especially as zero-carbon housing (under any definition or form in which it may emerge) is likely to become mandatory under the Building Regulations. We return to this in our consideration of issue 2, although since we have recommended changes to policy 3 this conflict may not now be of such significance, at least in the short term.
23. The results of the DJD modelling for various possible percentage provisions were presented in the form of two base ranges (‘trough to peak’ and ‘current

to peak’). At the hearings we also asked for additional outputs to be generated, one for 33% provision and others for the range of percentage provisions using ‘fixed’ trough, current and peak positions (ie not composite ranges). Not surprisingly, the study and the later outputs show that sales values at the lowest points of the recent market trough (sales value £1,500psm) make none of the modelled scenarios viable, regardless of the percentage of the AH target. On the other hand, at values of £3,000psm (taken as representative of the peak in 2007) 93% of schemes were viable at 33% AH provision and 88% at the JCS proposed level of 40% provision.

24. Between the above two extreme points of the market, comparatively small variations in sales values can make a substantial difference to viability. At £2,250psm 45% of schemes are viable at 33% AH provision and 34% of schemes at 40% AH. At £2,500psm 66% of schemes are viable at 33% AH provision and 59% of schemes at 40%AH. It is impossible to foresee how market conditions will develop over the next 15 years to 2026 and whether or when improvements in the economy or more favourable mortgage conditions will feed through into rising sales values and, if they do, how sustainable they will be. Nonetheless, it appears that the spread of current values make some 66-45% of schemes viable at 33% AH provision and 59-34% at 40% AH. This picture could become still more favourable if economic recovery feeds through into a more active market with a reassertion of the underlying demographic pressures leading to increased sales values. Since this is a policy extending to 2026, our final conclusion on this matter is that the evidence on viability is sufficiently robust to support a policy based on 33% provision, but materially weaker in the case of 40% provision.

Overall conclusion on Issue 2

25. Since the Exploratory Meeting some of our initial stated soundness concerns have been met by the commissioning and findings of the DJD study and the general content of the changes included in FC1-4. However, our consideration of the evidence base, all the discussions at the hearings, and the responses to the advertised changes leads us to a final judgement that a target of more than 33% (on sites of 16 or more) would represent an unacceptable degree of front-loading to deal with short-term needs and that, in any case, the viability study does not reasonably support any higher provision. FC1-3 therefore require some alteration as set out in IC6-7 (Appendix B) in order to (a) reflect our conclusion on need and viability in policy 4, (b) refer to the role of the outputs of the post-hearing runs of the DJD model in justifying viability based on 33%, (c) include the commitment to formal review of the policy if necessary in the light of future assessments of overall needs and tenure mix and (d) present the subject matter of paragraphs 5.28-29 in a clear form, separating coverage of need from that of viability. FC4, which explains the scale of the contribution expected from rural ‘exception’ sites, equating to about 10% of overall need, requires no alteration.

Overall recommendation on Issue 2

In order to secure the soundness of the JCS in respect of AH, we recommend that it be changed as set out in IC6-7 (Appendix B). This amends the content of FC1 (as set out in Appendix A) and replaces FC2-3 entirely. FC4 remains unaltered.

Issue 3 Does the JCS make sound provision for sites for Gypsies, travellers and travelling showpeople?

26. FC6-7 (together with SC8) reflect the proposal in the Localism Bill to abolish the RSS. The changes retain the requirements set out in the partial revision to the EEP, so to that extent the JCS remains in conformity with it. However, they signal that abolition of the RSS would be followed by new targets for permanent residential and transit pitches for the period from 2012, based on (i) updated local assessments of need for sites for Gypsies & travellers in the 3 Districts and (ii) additional plots for travelling showpeople in or with easy access to the Norwich urban area. In our view this is a sound approach.

Overall recommendation on Issue 3

In order to secure the soundness of the JCS in respect of provision for Gypsies, travellers and travelling showpeople we recommend that it be changed in accordance with FC6-7 and SC8 (Appendix A).

Issue 4 Does the JCS provide a sound strategic approach to planning for the economy and employment?

27. As in the case of housing, the JCS takes on board the employment target included in the EEP (35,000 new jobs in 2001-21), projecting this forward to 2026 on an annualised basis. Taking account of the additional jobs created in 2001-2008, a further net gain of 27,000 jobs would be required in 2008-2026. This figure is given the same status as the employment figures in the EEP: ie, it is treated as an indicative target for net employment growth to be used as a reference value for monitoring purposes and guidance for local authorities in their policy and decision making on employment matters.
28. Until relatively recently it was expected that this target would be readily exceeded. However, the Spring 2010 run of the East of England Forecasting Model recorded a fall in employment since the peak period of 2008, but still forecast eventual achievement of the target by 2027. Although an output from a later run of the model is likely to show some further undershoot by 2026, we agree with GNDP that the indicative jobs target is challenging but still appropriate for the purpose described above. As indicated below, the choice of strategic sites does not constrain achievement of the target and, overall, the JCS provides a sound underlying approach to future planning for employment related matters to 2026.
29. The aim of JCS policies 5&9 is to realise the leading regional economic role and potential of Greater Norwich by playing to its key strengths. Supporting evidence summarised in Topic Paper TP2 explains the rationale for the JCS requirement to supplement the current total of 195ha of undeveloped commitments by up to 130ha of new employment allocations. This overall total is comfortably more than the need identified in the Arup study but provides an appropriate margin of long-term flexibility to meet varying needs over the whole plan period. The strategic sites identified in the JCS mainly reflect those in the EEP and are in accessible locations, mostly within the NPA. Many are expansions of existing successful sites such as Norwich City Centre,

Norwich Research Park, UEA, EPIC, the centre for advanced engineering at Hethel, and Broadland Business Park. These locations, together with a range of other appropriate sites both new and existing, are capable of meeting a wide variety of employment needs, including enterprise hubs and the higher value/knowledge economy. A food and farming hub is also proposed. This is intended to capitalise on existing research strengths in this field and provide a showcase for the agri-food sector (an important employer in East Anglia) and underpin efforts to retain more potential added-value within the region.

30. In our view there is no reason to conclude that the JCS employment land provision is insufficient either quantitatively or qualitatively. We consider policy 5 broadly sound in terms of what it sets out as the ‘core strategic’ matters on the economy. There is no necessity to include further detail with regard to the continued safeguarding (or otherwise) of the employment land currently identified on the 3 Proposals Maps or the appropriateness of specific uses on certain sites. Such matters, and others, can be pursued if necessary in the context of future supporting DPDs or SPDs. However, further clarity is required with regard to the way in which the proposals included in policy 9 for significant expansion of the employment-related activities at UEA/Norwich Research Park will be taken forward through DPDs. This is achieved through the GNDP change at SC10b.

Overall recommendation on Issue 4

In order to secure the soundness of the JCS in respect of provision for the economy and employment we recommend that it be changed in accordance with SC10b (Appendix A).

Issue 5 Does the JCS accommodate the planned growth in ways which soundly address climate change, protect environmental assets, promote good design, and secure appropriate energy and water efficiency?

Addressing climate change and protecting environmental assets

31. Policy 1 seeks to address climate change and protect environmental assets through a series of requirements aimed at increased resource efficiency, including the protection of wildlife habitats and the provision of a multi-functional green infrastructure (GI) network. Some soundness-related changes are required to reflect the requirements of European Directives concerning international sites and PPS9 in relation to nationally-protected sites, as set out in the GNDP soundness changes SC1 and SC3.
32. GNDP has also put forward soundness changes which remove the confusion caused by the misleading title and content of the diagram at p35 of the JCS, replacing it with two new indicative diagrams and introducing appropriate references to them [SC2 and SC4]. One diagram shows ‘biodiversity enhancement areas’ and the other the indicative proposed ‘green infrastructure network’. Taken together with the greater number of major GI projects now named in the replaced Appendix 3 (referred to under issue 9 below, and which now matches other references in the JCS), these changes embed GI into the JCS in an effective way and provide appropriate guidance for future plan-making. [We note that recent post-hearing responses to advertisement of

the new diagrams identify some small inaccuracies in the Yare Valley. These could be dealt with via appropriate minor changes.]

Promoting good design

33. Policy 2 generally reflects national guidance in PPS1 Delivering Sustainable Development, aiming to ensure that all development will be designed to the highest possible standards and requiring it to create a strong sense of place and respect local distinctiveness. It sets out a series of sound design criteria intended to promote these objectives. However, GNDP accepts that the requirement for 10 units or more dwellings to achieve at least 14 points in the CABE ‘Building for Life’ criteria could be unnecessarily prescriptive and counter-productive if operated mechanistically. SC5 therefore makes appropriate changes to the references to the silver and gold standards.

Energy and Water

34. Policy 3 aims to maximise the use of low or zero carbon development, subject to environmental constraints. It therefore requires major developments of over 500 dwellings or 50,000sqm of non residential development to be supplied with all their energy needs from ‘dedicated contractually linked decentralised and renewable sources’. Development below these thresholds is required to maximise potential for doing the same and, for any outstanding balance, contribute to a carbon offset fund to make equivalent savings. PPS1 Supplement: Planning and Climate Change generally supports the setting of local targets for the percentage of the energy to be used in new developments coming from ‘decentralised and renewable or low-carbon energy sources’ where (a) this is viable, (b) there is a clear rationale for the target, and (c) it has been properly tested. It states that any particular demonstrable opportunities for increasing the target percentage should be identified using development area or site specific targets to secure this potential. PPS22: Renewable Energy (at para 8) also supports the concept of local policies requiring a percentage of such energy to be derived from on-site renewable energy sources. However, it also makes clear that this is subject to viability and that the policy should not be framed in such a way as to place an undue burden on developers, for example by specifying that all of the energy to be used in a development should come from on-site renewable generation.
35. The evidence base for this policy is the Sustainable Energy Study dated May 2009. This identifies that the technical renewable energy potential of the plan area is 129% of its current energy consumption. However, this is a ‘high level’, theoretical study which does not fully consider constraints such as landscape, wildlife habitats and grid connection. In our view it does not provide sufficiently robust evidence to demonstrate that local circumstances justify the mandatory nature of policy requirements which effectively seek 100% renewable energy or equivalent compensating carbon offsetting in all cases. This is contrary to national advice in PPS22 and we are not aware of any other local planning authorities seeking to apply requirements on anything approaching this scale.
36. Although GNDP put forward some changes to policy 3 [SC6-7] to (a) bring greater consistency with the terminology employed in the glossary to the PPS1 Supplement, (b) delete the requirement for ‘contractual linking’ of energy supplies (which could be inequitable for future consumers) and (c) clarify the way in which viability issues would be tackled, we consider these

changes insufficient to bring the JCS into line with the approach outlined in the PPS1 Supplement and PPS22. Further change is required to the first two bullet points of policy 3, replacing them with a less mandatory, but still stretching, policy as set out in the package of changes at IC2-5. This includes linked changes to the policy, its reasoned justification, the monitoring framework (Appendix 8) and the glossary (Appendix 9). The changed policy requires a minimum of 10% of energy to be derived from decentralised and renewable or low carbon sources and places a requirement on developers to show that they have transparently considered opportunities to maximise any viable potential for a higher standard of provision. However, it does not impose an unrealistic over-prescriptive approach. As advised in para 41 of the PPS1 supplement, Design and Access Statements should be the medium for demonstrating that opportunities have been considered and taken. IC2-3 will require developers of larger sites to show that they have made the most of any available local economies of scale.

37. Turning to sustainable building construction (bullet points 3 and 4 of policy 3), the PPS1 Supplement states that planning authorities should help to achieve the national timetable for reducing carbon emissions from development and acknowledges that there will be situations where it would be appropriate for authorities to anticipate levels of building sustainability in advance of those set out nationally. However, it advises that local requirements for sustainable buildings must be based on clear demonstrations of local circumstances that both warrant and allow this, such as clear opportunities for significant use of decentralised and renewable or low-carbon energy, or circumstances in which without the stated requirement (for example on water efficiency) the development in question would be unacceptable in its location.
38. Policy 3 requires all new housing development to reach Code for Sustainable Homes level 4 (CSH4) after adoption of the JCS and CSH6 by 2015, with qualifying non-residential development meeting BREEAM excellent standards after adoption and BREEAM outstanding, or equivalent, from 2015.
39. The financial impacts of the JCS requirements on development costs are uncertain. However, they could have a significant impact on overall costs, and thereby on the viability of other important aspects of the JCS such as affordable housing, thus bringing direct tension or conflict between the objectives of JCS policies 3&4. National policy on the definition of zero-carbon development has yet to emerge and it remains to be seen (a) what form the national target to reach this standard by 2016 will take, and (b) what role, if any, carbon offsetting may play in this process. In the meantime we consider there to be no firm justification for placing all development in the JCS area on a mandatory faster track in terms of sustainability standards. In our view further change to the third and fourth bullet points of policy 3 is required as set out in IC2. These changes will remove their mandatory nature, while still encouraging opportunities to be taken for maximising the use of sustainable construction where the scale and/or economics of development make this viably achievable or other specific circumstances permit it.
40. We agree that some more development of the topic of carbon budgeting could have improved the JCS and provided more precise monitoring targets, although it can be very difficult to isolate the influence of ‘spatial planning’ activities from all of the many other factors and individual personal and

corporate decisions influencing carbon outcomes. However, there is no material in the evidence base that could be drawn upon to fill any such gap convincingly and in any case it is not our remit to make the JCS ‘better’. The role of the JCS is to provide sound strategic guidance and principles for sustainable development which, in very broad terms, is what it does. It may be that there will be scope for the consideration of some appropriate carbon budgeting at the detailed master planning stages of major developments which could be monitored through the Annual Monitoring Report (AMR).

41. Looking finally at water-related matters, these are critical because the JCS area is subject to ‘water stress’, with low levels of rainfall, a substantial key development area lying very close to internationally protected sites, including the Broads, and significant issues concerning waste water treatment which will require improvements at a number of works. As the Task 2 Habitats Regulations Assessment summarises the situation: *‘.....not only is there insufficient available water to increase abstraction, but there is also a need to reduce the amount of water currently abstracted’* because the River Wensum Special Area of Conservation (SAC) currently has unfavourable conditions relating to water quality, abstraction, silting and the physical state of the channel. Current abstraction levels mean that the river between Costessey Pits and Hellesdon Mill has unsatisfactory flows.
42. Although it seemed to require the deadline posed by the hearings, a reasonable degree of clarity and unanimity was finally achieved on these issues. In the end we were impressed that Anglian Water Services (as provider) and the Environment Agency and Natural England (as regulatory bodies) appear to be working well together to fulfil their various responsibilities while also meeting the challenging task of providing the necessary water infrastructure both to cater for the substantial scale of growth proposed in the JCS and to address the demands of the Water Framework Directive (WFD) and the Habitats Directive (HD). While this will require continuing timely and appropriate investment through successive Asset Management Plans, we heard nothing to lead us to the conclusion that the levels of development planned in the JCS will not be able to proceed in step with the necessary new and improved infrastructure. If unexpected and irresolvable problems were to occur in individual cases, policy 3 prevents further development without the accompanying infrastructure.
43. Measures to reduce water use, including metering, will play a part in meeting the water requirements of the full quantity of development proposed in the JCS. However, policy 3 also proposes the imposition of CSH4 water-related standards on adoption and CHS6 water standards by 2015 in the case of developments of over 500 houses, which will include grey water recycling and rainwater harvesting. While this would have cost implications for developers and house-buyers, careful husbandry and management of water resources will be important to reinforce the actions being taken to address the long-term particular local challenges posed by the WFD and HD in terms of water supply and improvement of water quality. Consequently this part of policy 3 is sound because it will ensure that new development (a) minimises the demand for water and (b) reduces the burdens placed on wastewater flows. In both cases this will reduce the costs of provision and minimise the environmental consequences of providing new sources and treating waste water to the challenging tighter standards that will apply in future.

Overall recommendation on Issue 5

In order to secure the soundness of the JCS in respect of the subject matter of policy 3 we recommend that it be changed in accordance with the changes set out at SC1-5 (Appendix A) and the package of changes set out at IC2-5 (Appendix B). The latter replace SC6-7 in Appendix A.

Issue 6 Does the JCS achieve an appropriate and deliverable distribution of the planned growth, linked into a sustainable pattern of transport infrastructure in the form of the Norwich Area Transportation Strategy?

Norwich Area Transportation Strategy (NATS)

44. National policy in PPG13: Transport aims to promote (a) more sustainable transport choices and (b) accessibility to everyday destinations by public transport, walking and cycling, thereby reducing the need to travel, especially by car. Reflecting that approach, the EEP specifically requires that the substantial growth planned for the NPA should achieve a major shift in emphasis towards travel by public transport.
45. Apart from packages of individually smaller-scale improvements such as those involving cycling and walking facilities, changes within the City Centre, and softer measures such as travel plans, the main elements of NATS shown on the diagram at JCS p61 are the Northern Distributor Road (NDR) and a pattern of radial Bus Rapid Transit (BRT) corridors and Core Bus Routes (CBR). The latter two fan out from the City Centre along main radial routes towards the major growth locations and also link across the centre. Several also link to the 6 current car parks serving the city’s extensive Park-and-Ride system as well as to a proposed 7th site.
46. Some of our initial soundness concerns involved a lack of clarity about the degree of certainty which could be attached to the proposed BRT and CBR networks and whether and when they would be capable of being developed to offer an attractive alternative to travel by car. At the time the JCS was published (November 2009) public consultation on NATS had only recently been carried out and the implementation plan was still *‘in the process of being developed’* (TP9). Since then the implementation plan has been further developed and we have been provided with further evidence dated April 2010 (EiP9) and May 2010 (EiP88), as well as the GNDP responses for matter 3 concerning public transport to the various growth locations. These provide us with more confidence that there can be a realistic prospect of developing the BRTs and CBRs over time and in step with their various related developments in order to provide attractive turn-up-and-go public transport options. Work has also commenced on detailing the types of measures that will be necessary along the individual corridors. Some of these are physically narrow and it is evident (especially in times of relative economic austerity) that determined political effort and commitment, coupled with a sustained level of partly developer-funded investment, will be needed to achieve the incremental roll-out of effective bus preference schemes in time to make a substantial difference to the travel choices of future residents at the growth locations. Subject to that sustained commitment, we consider that BRT and CBR networks are sound elements of NATS.

47. Turning to the NDR, some form of bypass or distributor road to alleviate flows on the northern lengths of the Outer Ring Road has long been an aspiration. Due to environmental constraints in the Wensum Valley the original complete east-west route was scaled down to that now proposed, linking the A47 at Postwick in the east to the A1067 in the west.
48. Dealing with the ‘justification’ for the NDR, GNDP regards this as fundamental to the delivery of the JCS on two grounds. Firstly, significant improvements to public transport (BRTs and CBRs), walking and cycling can only be achieved through the release of currently congested road capacity in North Norwich. Secondly, without the NDR, road conditions would be further exacerbated by the eventual construction of 10,000 homes and all the substantial associated development proposed in the north-east triangle including the strategic employment locations at Broadland Business Park, Rackheath and the Airport.
49. Some local groups and individuals have expressed firm and enduring opposition to the NDR at every stage of its evolution. On the other hand, public consultations have also indicated strong overall support for it from the public and from business. The rationale for the NDR, as summarised in the previous paragraph, is reflected by its inclusion in the Local Transport Plan and DfT’s acceptance of the scheme’s Major Scheme Business Case (MSBC). This led to the DfT granting the NDR (A47-A140) ‘Programme Entry’ status in December 2009 and still underpins its inclusion in the ‘development pool’ discussed further under ‘effectiveness’ below. Sensitivity tests in connection with the MSBC accorded the NDR (A47 to A1067) a Benefit to Cost Ratio (BCR) of 6.1, and 4.6 in the case of the shorter route (A47 to A140). Both of these scores are well within DfT’s ‘high value for money’ category, the minimum standard for that judgement being a BCR of 2.0. In fact, the NDR ranked 4th of the 22 schemes in the DfT’s original ‘development pool’ in terms of its BCR ranking, which is there referred to as 4.0. The scheme also has by far the highest Net Present Value rating of any of those schemes, at £476m.
50. The proposed eventual provision of 10,000 houses in the North East Triangle, discussed later, would bring substantially increased demands for travel in the northern suburbs and, in combination with NATS, create new opportunities for traffic diversion and management. Table 4 of EiP88 indicates the forecast changes in flows on points on 5 radial roads to the north east of Norwich in 2016 and 2031 as compared with the 2006 base year. While there are some differences from one radial to another, this shows that total flows on these routes would grow substantially from 2006 to 2016 and then again to 2031 without the interventions comprising NATS. With NATS, including the NDR, the overall total of flows still increases. However, at points close to the present Outer Ring Road this growth is significantly mitigated, whereas at points just to the south of the NDR (within the growth triangle) total flows on the radials are, unsurprisingly, considerably greater than would otherwise be the case. However, as GNDP indicates, new housing in that area can be designed to take account of that growth.
51. It has been argued that a non-NDR package of NATS interventions has not been modelled and that this could conceivably produce a better overall solution. However, we are not convinced that such an option would be realistic and place weight on the DfT’s favourable ‘in principle’ assessments

and the judgements which led to the NDR’s acceptance into ‘Programme Entry’ and the ‘Development Pool’, as discussed above.

52. Turning to ‘effectiveness’ aspects of the NDR, when the section from A47-A140 was granted Programme Entry status it was then complemented by the ‘Postwick Hub’ scheme at the A47 junction, which was to be funded through DCLG Community Infrastructure Funding (CIF). The additional western section of the NDR (A140 to A1067) was then, and is still, proposed to be funded by prudential borrowing by the County Council, planned to be partly offset by developer contributions.
53. However, the Autumn 2010 DfT Spending Review reappraised the national priorities to be accorded to individual schemes. The NDR was not included in the ‘approved/supported pool’ but placed into a ‘development pool’ with 21 other projects. In February 2011 the number of schemes in that pool was increased to 45, following the addition of others from the former ‘pre-qualification pool’. Although these schemes represent ‘value for money’ they will not all be affordable. Subject to further analysis and the submission of ‘best and final funding bids’, DfT expects final funding decisions on these schemes to be made by the end of 2011. It states that requests for funds from these schemes are likely to exceed available funding by a ratio of 1.5:1, although further cost savings will be sought on individual schemes. GNDP remains confident that the NDR will be funded at an early date, but at the expected date of JCS adoption this will remain an unknown factor. Although the GNDP leaders have resolved to explore all possible funding opportunities, it also remains to be seen, post-spending review, whether the County Council will be in a position to maintain its substantial commitment to funding of the scheme, especially the non-DfT funded western section of the road required to provide full linkage between the A47 and A1067.
54. One of our initial soundness concerns was the extent to which the JCS could be implemented if the NDR were not constructed to the timescale expected, bearing in mind that the strategy states that the road is ‘*a fundamental requirement for growth (of the North East Triangle) and the implementation of the remainder of NATS, including public transport enhancements*’ (para 6.18). This concern was heightened by the recent events summarised above.
55. Referring to the requirements of para 4.46 of PPG12, we therefore asked GNDP to consider whether it would be feasible to introduce suitable changes to increase the resilience of the JCS in the face of this uncertainty by clarifying the degree to which development could/could not, occur prior to (or without) the NDR. A draft response was put forward and amended through discussion at the hearings, resulting in the package of changes comprising SC12, 15 and 27 (as amended by document RF117). These changes were subsequently advertised under reference IC1 and have prompted further written representations which we take into account in our consideration below.
56. This package of changes:
 - (a) clarifies the scale of pre-existing commitments that can occur without the NDR or implementation of Postwick Hub (1,400 homes);

(b) goes on to provide a perspective on the quantity of further development that may be achievable subject to some form of acceptable improvement at Postwick (a total of 1,800 homes forming part of the JCS proposals for the triangle, plus further development at Broadland Business Park);

(c) then commits to investigate, through the Area Action Plan (AAP), whether or not any additional given level of the proposed growth at the triangle could take place if the AAP were to identify appropriate alternative transport and other infrastructure (short of the NDR); and finally,

(d) indicates that development could not proceed past any pre-NDR threshold established in the AAP without triggering a complete review of the JCS proposals for the growth triangle.

57. The firmness of the evidence base for the quantities of development identified in (a) and (b) is unclear, and may well require more detailed justification to be produced to underpin decisions on any individual schemes if such were to be brought forward. Nonetheless, we are satisfied that these give broadly sufficient indications for the purposes of the JCS, not least because they provide an appropriate impetus and starting point for the further investigations required of the AAP as outlined at (c) above.
58. Whereas the JCS tends to portray a stark situation in which no development can take place at the triangle without the NDR, these changes provide an appropriately qualified partial alternative approach to development in North East Norwich. They go as far as currently possible to give the JCS more resilience during a period in which the deliverability of the NDR, and therefore the full effectiveness of the strategy in respect of its largest growth location, could be in doubt for an unknown length of time.
59. It is plain that some would prefer a fuller ‘plan B’. Some wish no growth at the triangle with and/or without an NDR. Others would like the JCS to say more about the scale of growth that would be appropriate in the AAP referred to at para 56(c) above and the transport infrastructure that would enable it. Some have linked the latter to the concept of developing the proposed roads shown in the Broadland Local Plan into an ‘inner link road’. Others again suggest that contingent ‘reserve sites’ be identified in case of non-delivery of the NDR. However we consider it neither possible (because no supporting evidence base exists) nor necessary and appropriate for the JCS to go further than generally set out in RF117. The AAP is the proper mechanism for carrying out the site-specific investigations, considering the alternatives, and undertaking the public consultations necessary to establish the point at which non-delivery of the NDR may, or may not, become a ‘showstopper’ for further development in the growth triangle. The JCS should not go beyond its strategic role and fetter the necessary thorough investigation through the AAP by making premature commitments based on untested scenarios.
60. Should uncertainty about the NDR persist, the changes to the JCS now specify a mechanism for determining how far development at the growth triangle can take place without triggering a review of the strategy’s proposals for that area. However, in the light of responses to the recent advertisement of IC1 we make four main changes to the Council’s text in SC12 and SC27 (see IC1 in Appendix B). Firstly, a change to policy 10 makes its text consistent with

other small alterations to RF117. Secondly, other changes better reflect the fact that uncertainty about the NDR is not necessarily just a matter of its timing, but also whether or not it will be delivered at all, and clarifies that the AAP will test possible interim or alternative transport schemes to establish how much growth could occur. Thirdly, the text is altered to refer to the latest statement (February 2011) from the DfT about the funding of major transport schemes. Fourthly, other changes delete most of the content of RF117 relating to Postwick Hub both to reflect the content of the recent letter of 21 January from the Minister for Housing and Local Government, but also because we are unconvinced of the strategic necessity for the JCS to descend to the detail of whether or not the Hub is separable from the NDR as a whole. Fifthly, a change to proposed para 7.18 of SC27 clarifies that non delivery of the NDR would trigger a review of JCS proposals for the growth triangle rather than a review of the strategy as a whole.

The major growth locations

61. The distribution of growth among the major growth locations is dealt with under the following headings:

The North-East Triangle

The A11 corridor settlements

Easton/Costessey

Long Stratton

The smaller sites allocations

62. The North-East Growth Triangle. This is by far the largest of the JCS growth locations with 7,000 homes proposed here by 2026, rising to around 10,000 eventually. As shown in JCS Appendix 5, the inner boundaries of the triangle adjoin the present outer boundaries of the urban area at Old Catton, Sprowston, Dussindale and Broadland Business Park, extending north and east to take in a substantial rural zone including the currently detached settlements of Thorpe End and Rackheath. The northern limit of the growth area would be bounded for the most part by the NDR, but part would lie to the north of the road, this being the site of Rackheath eco-community, one of four locations in England identified in the ‘ecotowns supplement’ to PPS1 as having the potential to be a development of this kind.
63. As the supplement puts it, *‘eco-towns are one of a range of options local planning authorities should consider when determining how to meet theirhousing requirements.’* Although it is not entirely clear what status the former Government’s policy and funding streams for eco-towns will have in future, the JCS states (para 6.14) that *‘the Rackheath eco-community will remain part of this strategy even if the Government’s programme falters.’*
64. Policy 10 and the NATS diagram set out clear and appropriate guidelines for the future overall AAP and other master-planning exercises by which the detailed planning of this area would proceed. These cover a wide range of issues such as the provision of a District Centre (to include a new library and education and health facilities), other local centres, schools (pre-school, 6 primary schools and a new secondary school), new employment allocations

including expansion of the employment sites at Broadland Business Park, Rackheath and the Airport, greenspace allocations, BRTs and CBRs to the City Centre, orbital bus services, pedestrian and cycle links, new rail halts on the Bittern Line, and permeability across the NDR. SC13 and SC14 respectively clarify the options for provision of the District Centre and the need for an AAP to coordinate development in this area; they therefore make the JCS effective in these respects.

65. A land budget prepared for the purpose of the examination, in response to a query from us, has demonstrated that the identified area is sufficient in size to accommodate development on this scale, albeit that some quite large parts of it are not developable because of the existence of a range of constraints of one sort or another. Even in parts of the area with relatively few constraints it will be necessary to ensure that the issue of biodiversity enhancement is kept to the fore in the future AAP, particularly in the design of the buffer zone between the eco-community and the Broads. If this is to fulfil its function, it will be important to achieve the right balance between the activities planned for that area and those intended for other open areas within the triangle.
66. In addition to the range of facilities referred to above, the LIPP identifies infrastructure requirements needed for this area in terms of water supply, waste water, electricity, and transport. Our initial soundness concerns queried the degree to which plans for public transport improvements were likely to be realistic, especially bearing in mind the heavy reliance placed on public transport in the proposals for the eco-town. However, as discussed earlier, we now have greater confidence about this issue, subject to continuing commitment to, and investment in the BRTs and CBRs.
67. We had earlier expressed the same concern about how much weight could be placed (in terms of the sustainability of the eco-town) on the JCS references to improvements to the Bittern Line. Proximity to this line was cited in DCLG documents as a key strength of the Rackheath eco-town, yet this is currently an unattractive route with infrequent trains serving only a small number of destinations. It was only through our questions at the hearing itself that we were subsequently provided with some fuller evidence from the promoters of the eco-town which appears to offer a prospect that practicable, affordable and timely rail improvements could be delivered, offering either half-hourly and then quarter-hourly train services, or quarter-hourly services if a tram-train solution were adopted, possibly enabling stops to be made at a greater number of destinations between Thorpe Station and the eco-town.
68. The development consortium for Rackheath has been working up plans to meet the requirements for eco-towns set out in the supplement to PPS1. The group is currently well-advanced in the process of completing a development agreement for over 4,000 homes within a mixed-use community. Substantial landowning interests supportive of the JCS also exist in other parts of the growth triangle, some having expressed aspirations to develop to similar high levels of sustainability. With the potential for construction of a variety of homes by a number of different builders there is no reason to conclude that this location cannot be developed generally as proposed and to the broad timetable set out at p111 of the JCS once the AAP and other more detailed planning processes are complete, subject to the existence of favourable market conditions to 2026 and beyond.

69. Members of the affected communities (those living within the Norwich urban area close to its edge, residents of Thorpe End and Rackheath, and those living in villages that would become much closer to the urban edge such as Great Plumstead, Little Plumstead, Salhouse, Wroxham and Spixworth) clearly express considerable strength of feeling against this large urban extension. This aspect of the JCS gave rise to a local group known as Stop Norwich Urbanisation (SNUB); it also prompted a petition to the local MP signed by more than 3,000 people opposing *‘any large scale housing developments that would increase the urbanisation of Norwich and ruin the surrounding countryside (including) the proposed “ecotown” at Rackheath and its dubious exemplar and any other inappropriate development.’* The petitioners signified their support for *‘dispersed housing plans developed according to the needs of rural villages and to invigorate their communities’*.
70. The eco-town was a particular focus of objection for representors in this area. This was for a number of reasons – because (as the apex of the triangle) it projects the greatest distance from Norwich into the surrounding countryside, perhaps because it is the portion of the growth triangle that has made the most public progress in terms of its planning, and also because there was a feeling that it had been ‘parachuted in’ from outside the planning process as a result of the previous Government’s call for promoters to submit schemes. There was also some hope and expectation that the focus on neighbourhood planning in the then awaited Localism Bill would provide local communities with levers to exercise more power over developments ‘imposed’ from a higher tier, whether at the regional level or at that of the individual Districts within the GNDP.
71. We understand these sentiments, although we have noted under Issue 1 that the scale of the JCS growth was a locally-derived choice by the 3 GNDP member local planning authorities. A large-scale urban extension north-east of Norwich has been a constant element of the JCS since the Issues & Options stage and the emergence of the potential eco-town during the preparation of the JCS provided an opportunity to plan the extension more coherently and sustainably. It is therefore not surprising that GNDP chose to grasp that opportunity and incorporate it into the emerging JCS, albeit that it does not seem to have become widely known locally until about June 2009 that part of the extension would take that form. Referring briefly to localism, the Bill indicates that neighbourhood plans are not intended to be able to override core strategies.
72. Moreover, there are strong reasons to support the selection of this area as a location for a major urban extension. Fundamentally, if development is to take place at the overall scale proposed by the GNDP constituent authorities (which we have found sound), the pattern of small towns and villages in Broadland offers no realistic alternative ‘dispersal’ options capable of accommodating such numbers in ways likely to be sustainable and capable of respecting the characters of the host settlements. There is no evidence that Norwich could accommodate more than already reflected in the JCS account of existing commitments, and it appears (from our consideration of the South Norfolk options) that redistribution from the north of the NPA to south is not a viable option. Concentrating the proposed development at this major growth location is the most effective way of maximising its contribution to the NPA’s sustainability and providing infrastructure economically. Nonetheless, the

very large scale of the proposed change to this area would clearly have enormous effects on its character and the lives of those living in and around it. It will therefore be vital to achieve successful public engagement in the detailed planning of this long-term development through the AAP and ensure that the effects of the growth area are contained to the maximum possible extent and prevented from leading to any further intrusion into more tranquil areas of countryside closer to the Broads.

73. The A11 corridor settlements (Wymondham, Hethersett and Cringleford)

The JCS proposes that these three locations should accommodate a total of 4,400 dwellings (2,200, 1,000 & 1,200 dwellings respectively). Cringleford is within the Southern Bypass and is effectively part of the Norwich Urban area, separated only by the Yare Valley. It lies close to the planned expansion of the strategic employment area centred on Norwich Research Park, Norwich University Hospital and UEA. Hethersett is a ‘Key Service Centre’ lying just outside the bypass, but still close to the same focus of economic activities as well as to employment at Longwater and Hethel. Wymondham is a larger free-standing town with a population of nearly 13,000 lying about 8km from the edge of Norwich at Cringleford and 14km from the city centre. It also has a station on the Norwich-Cambridge-London line and its own employment sites as well as being close to the planned Advanced Engineering Centre at Hethel and Lotus Technology Park.

74. All three locations are proposed to be linked by the common thread of a BRT running from the City Centre via Thickthorn Park and Ride. CBRs would also link Hethersett and Cringleford with destinations in this sector of Greater Norwich including the hospital, the research park, UEA, Bowthorpe and Earlham. Comparatively recent evidence (EIP88) has clarified that the combined potential custom from existing and JCS-proposed development would be well above that which could reasonably be expected to support a viable 10 minute frequency turn-up-and-go BRT corridor, building upon existing bus priority lengths.

75. The JCS states that implementation of these three growth locations will require significant improvements at the Thickthorn Junction of the A47/A11. The Local Investment Plan and Programme (LIPP) costs these works at £30m (including bus priority and park-and-ride improvements) and places them as priority 1 requirements to be delivered by 2016. However, it recognises that the junction improvements are likely to be phased and interested parties in the Infrastructure Forum are working towards that end. Gradual development at the growth locations, generally in step with the JCS indications at p111, is therefore unlikely to be prevented.

76. All the A11 corridor locations are the subject of active interest by developers, so there is no reason to conclude that appropriate sites for the development cannot be selected through the proposed Wymondham Area Action Plan (AAP) and, at Hethersett and Cringleford, through the South Norfolk Site Specific DPD. The LIPP also identifies that non-transport priority 1 infrastructure improvements to sewerage and waste water treatment will be needed to facilitate growth at these settlements. However, it is evident that the relevant parties should be able to address these issues. The JCS proposals for this area are therefore sound.

77. Easton/Costessey This location is planned to accommodate 1,000 dwellings. The two settlements lie at the western edge of the Norwich Urban Area near the A47 Southern Bypass/A1074 junction in an area which has been (and is still) in the throes of considerable growth at Longwater Employment Area, Norfolk Retail Park, Queens Hills, Lodge Farm and other sites, as well as containing the extensive area of the Royal Norfolk Showground. This fringe area of Greater Norwich has a somewhat disjointed feel which may be capable of better coherence, integration and focus if the site/sites selected for further growth through the South Norfolk Site Specific DPD are carefully chosen (a) to further that aim and (b) to maximise the effectiveness of the Dereham Road BRT so as to assist its ultimate provision of a 10 minute frequency turn-up-and-go service. The latter is to be the first BRT to be implemented and work on its design has begun. The LIPP refers to other possible constraints needing to be overcome before full development of this growth location can occur (including the need for changes at the A47 Longwater Junction). It also identifies other items of infrastructure needing to be provided in step with development, but there is nothing to suggest that these infrastructure issues are irresolvable. The JCS proposals for this area are therefore sound.
78. Long Stratton The JCS proposes 1,800 dwellings here, subject to the provision of a developer-funded bypass and a caveat requiring resolution of sewerage constraints that could otherwise prevent full implementation of this number of dwellings. We identified this growth location as one of our initial soundness concerns because of the relatively small size of this ‘key service centre’, its relative distance from Norwich and its location away from the existing and potential public transport options serving the A11 corridor settlements. Successive stages of the SA process have included adverse comments about growth here, commencing with the Issues and Options consultation, which accorded Long Stratton a very low score and found it not a suitable location for further investigation for strategic growth.
79. The SA for the favoured option at Regulation 25 stage (2+) (RF22) also found growth in Long Stratton potentially less sustainable because travel distances to Norwich, where most people work, along an unimproved A140 corridor gave less opportunity to make bus use more attractive than in the case of option 1 (with growth concentrated at Wymondham and Hethersett). However it recognised that the scale of growth in Long Stratton was a small proportion of the overall JCS requirement and that while its impacts were locally significant, particularly on the regionally important A140 corridor, growth at Long Stratton did not significantly affect the sustainability of the favoured option and brought local environmental improvements from a bypass.
80. By Regulation 27 stage the SA still identified Long Stratton as *‘less suited to encouraging more sustainable patterns of travel..(as it is)..geographically isolated and there is little potential to deliver public transport improvements that will have a realistic chance of encouraging people out of their cars.’* Despite this it goes on to state that the proposed growth at Long Stratton (as a proportion of the JCS total) is not such as to *‘place in question the overall sustainability of the JCS in terms of achieving sustainable patterns of travel’*. After discussing the proposed growth as the only means of securing a bypass and its associated benefits the SA finds it *‘more difficult to say whether the ‘local level’ benefits associated with growth at Long Stratton outweigh the*

more strategic disbenefits’. It concludes that, irrespective of the answer to that question, there must be focused efforts to mitigate negative effects and recommends that *‘there is justification for going further, perhaps by developing a bespoke vision for achieving an ambitious degree of self-containment within Long Stratton.’*

81. It is certainly the case that provision of a bypass is a long-held community aspiration in Long Stratton, since a consultation exercise by the County Council in 2002 revealed that 96.4% of respondents considered one to be necessary. Planning permission, now lapsed, was once granted for a slightly longer, more highly engineered dual carriageway route and an Inspector’s report in 2006 recommended confirmation of a Compulsory Purchase Order for the necessary land. Although it appears that there is no longer any reasonable prospect of public funding for this or any other bypass route in the foreseeable future, the South Norfolk Sustainable Community Strategy (SCS) still accords high priority to reducing the effects of traffic in Long Stratton and the local MP has written in support of provision of a bypass.
82. Specific expressions of local opinion have been slightly less clear. At Issues and Options stage 68% supported growth to fund a bypass although 63% of supporters favoured fewer than 1,500 new dwellings. In a separate survey at that time opinion was narrowly divided with 586 [49.6%] opposing the preferred option for the bypass and associated houses and 570 [48.2%] supporting it. However, this percentage support is said to be positive when compared to public attitudes to many of the other strategic growth locations. Although the Parish Council decided against the Preferred Option proposals, the representation at that time appears to have been based on fears that the full level of housing could be built without a guarantee of a bypass being provided. However JCS policy 10 and para 6.18 make clear that the latter is a pre-condition for the former and that approach can certainly be expected to be enforced through any planning permissions and agreements/undertakings for the housing development. The Parish Council’s response to advertised change IC1 makes it plain that it does not welcome the reduced scale of the bypass likely to result from the JCS proposal (ie a shorter, single carriageway road). However, SC15 makes no change to the wording of the JCS concerning the relationship between the bypass and the scale of development and in our view soundness considerations do not require any.
83. A number of other factors weigh in favour of the JCS proposals for Long Stratton. Firstly, it has an unusually large range of services for a settlement of this size (pop 5,690 in 2008, including Tharston) and a relatively good degree of self-containment with about 1,700 jobs. Local facilities include an industrial estate, the headquarters offices of the District Council and a local Housing Association, a high school (with adequate capacity), two primary schools, a leisure centre, library, police station, local shops and a health centre. This array of facilities should help Long Stratton to assimilate the proposed new homes and the new development, in turn, should reinforce the viability of these local services. Secondly, a bypass would remove 80% of the through-traffic (including HGVs) currently using the busy A140 between Ipswich and Norwich. This generates long queues at the pedestrian crossing near the village centre. Consequently a bypass would create significant improvements in environmental conditions, road safety and air quality, reduce noise intrusion and community severance, and free up opportunities for more

productive use of properties in the conservation area at The Street. Thirdly, strong local concerns have already been expressed over the amount of housing proposed at other settlements in the A11 corridor which may be considered possible ‘alternative’ locations for the Long Stratton growth.

84. Although Long Stratton is not served by a proposed BRT or CBR (a factor that contributed strongly to its relatively poor SA scoring), more recent evidence in EiP88 indicates that the proposed level of growth would make it feasible to increase bus frequency along the A140 to Norwich from the current 30 minute service to 15 minutes in future. In addition, further recent information in EiP86 outlines how a ‘Vision for Long Stratton in 2026’ is to be developed to take forward its future planning. As now confirmed by MC107, this vision is to be promoted through the medium of an AAP which will give appropriate scope for full public consultation.
85. Although the revised bypass would cost some £11,100 per dwelling the relevant landowner has confirmed that he would still be ‘incentivised’ to bring forward his land to meet the JCS proposals, including providing for other necessary infrastructure contributions and affordable housing.
86. Overall, we find the JCS proposals for Long Stratton justified and effective and consider there to be a reasonable prospect and resolve that they can be undertaken in such a way as to overcome past doubts about sustainability. As we also conclude that the JCS sets out an achievable growth trajectory for Long Stratton at p111, we consider the JCS sound in respect of Long Stratton.
87. ‘Smaller sites in the NPA’ The JCS provides for allocations of 2,000 and 1,800 dwellings respectively in the Broadland and South Norfolk parts of the NPA with policy 9 stating that *‘allocations to deliver the smaller sites will be made in accordance with the settlement hierarchy and local environmental and servicing considerations’*. Subsequent references are made to the smaller sites allowance in other policies including 14-16, which all refer to the possibility that the named key service centres, service centres and other villages may be considered for ‘additional development’ (ie over and above the numbers mentioned for the settlements in those policies) if necessary to help deliver the ‘smaller sites in the NPA’.
88. It is clear that the JCS gave rise to some confusion and misunderstanding about the way in which sites would be identified to meet this combined total of 3,800 dwellings, particularly concern that they could be spread too liberally through a wide range of less sustainable settlements rather than concentrated as far as possible in more accessible locations. GNDP explained that, in principle, the most favoured locations would be the suburban and urban fringe parishes of Colney, Costessey, Cringleford, and Trowse in South Norfolk and Thorpe St Andrew, Sprowston, Old Catton, Hellesdon, Drayton and Taverham in Broadland (as identified in policy 12). Again, in principle, these locations would be succeeded by the centres identified in policies 14-16. In South Norfolk some of the allowance could also be met by possible additions to the named major growth locations. It also became clear that some of the ‘smaller sites allowance’ may well be met by sites which, individually, could be quite large, albeit not of the scale of the major growth locations.

89. It is important that the JCS provides an effective, unambiguous brief for future DPDs so that they can identify an appropriate and sustainable set of sites to meet the substantial total requirement (3,800 dwellings) required to meet the ‘smaller sites’ element of the JCS. A package of proposed changes comprising some reordering of policy 9 [SC10a], a new paragraph after 6.5 [SC11], a change to policy 12 [SC17], and a change to the key of the diagram at p79 [SC18] would together remove the ambiguities and clearly explain this aspect of the JCS.

Does the JCS distribution represent ‘the most appropriate plan when considered against reasonable alternatives’ (PPS12 para 4.38)?.

90. With regard to the North East Norwich growth triangle, we have already concurred with GNDP’s judgement that from a relatively early stage in the evolution of the JCS there has been no reasonable sustainable alternative to a substantial urban extension in that location if this scale of growth is to be accommodated.
91. On the other hand, the geography of South Norfolk has presented a much wider range of potential options, as indicated in the original six choices considered by the Working Group in May 2008. Those options provided a range of distributions, none the same as the selected JCS option, including one with much larger allocations at both Wymondham and Hethersett and another with no growth at those locations but creating a new stand-alone settlement. By June 2008, 3 options were in play; officers recommended option 1 which allocated a combined total of 8,000 to Wymondham and Hethersett and none to Long Stratton. Following consultation on those options, SA of their effects, and an updated (reduced) calculation of the residual need remaining to be allocated, the GNDP Policy Group met in December 2008 to agree a favoured option. At that point South Norfolk introduced another alternative (2A) which was selected to go forward. However, by the meeting of the Policy Group in February 2009 2A was replaced by 2+ which was adopted as the favoured option in the Regulation 25 consultation and remained the chosen option through to the submitted JCS. A comparative SA (RF22) undertaken in February 2009 assessed all 5 of the most recent options (1-3, 2A and 2+) alongside each other.
92. It is not straightforward to make precise comparisons between the relative advantages and disadvantages of these 5 options from the SA undertaken in February 2009. This is not only because the required residual level of growth is somewhat less in the case of 2A and 2+ but also because there is now much more evidence available on some topics as a result of issues raised in response to our initial soundness concerns (such as the deliverability of the BTRs and CBRs) and other matters upon which more information has come to light as a result of the examination.
93. Overall, therefore, we have been able to gain a different perspective on the SA’s summarised strengths and weaknesses of the various options. Amongst these, as discussed above in relation to Long Stratton, there is more clarity that the unusually large range of services at this key service centre and the building of the long-sought bypass could form platforms for the ‘bespoke vision’ which the future AAP will need to develop and that some bus priority on the A140 could be introduced. With regard to the A11 corridor, recent

work has established that the proposed level of growth in the corridor (with Cringleford introduced as a highly sustainable urban fringe growth location and the reduced numbers at Wymondham and Hethersett) will still enable the development of viable BTRs and CBRs. It is also apparent that there is strong local opposition to development on a greater scale than currently proposed at these locations.

94. We therefore conclude that South Norfolk’s view that the JCS distribution represents the best overall ‘political fit’ is not inconsistent with judgements that it (a) represents the most appropriate plan when considered against the reasonable alternatives and (b) broadly fulfils GNDP’s duty under S39 of the 2004 Act to exercise its DPD-making functions with the objective of contributing to the achievement of sustainable development.

Overall conclusions on issue 6

95. Our broad conclusion is that the major principles of NATS, as reflected in the JCS, represent a sound and sustainable transport strategy for the NPA. The implementation of these measures would enable the JCS to proceed with a pattern of growth which is justified, effective and consistent with national policy. This conclusion is subject to a number of necessary changes that have been discussed above. Together, these give the JCS greater resilience and effectiveness in the case of delay to, or non delivery of, the NDR by indicating a mechanism for transparently establishing the maximum extent to which development at the growth triangle could proceed before triggering the need for review of the JCS in that respect.
96. The changes will also provide a clear and effective brief for later DPDs on the operation of the smaller sites allocations, and bring clarity about District Centre provision in the growth triangle and the need for a coordinating AAP. On an unconnected matter, SC16 appropriately introduces new text to clarify that policy 10 is not intended to be read as requiring developers to provide funding for existing deficiencies, which would be contrary to national guidance.

Overall recommendation on Issue 6

To secure the soundness of the JCS we recommend that it be changed as set out at SC9, SC10a, SC11, SC13-18 and SC27 (Appendix A), the latter to be changed in accordance with the contents of IC1 (Appendix B).

Issue 7 Does the JCS provide a sound framework for the future planning of Norwich City Centre, the remainder of the Norwich urban area (including the fringe parishes), and the hierarchy of centres?

The City Centre

97. The JCS seeks to enhance the important regional function of the City Centre by seeking to achieve economic, social, physical and cultural regeneration, including an emphasis on redeveloping brownfield sites. Policy 11 sets out a sound framework for future planning of the Centre, which will be the main focus for commercial, retail, office, community and institutional uses serving Greater Norwich and its catchment.

98. We note the success of the city and county councils’ parking management policy in placing a cap on city centre parking provision and the consequent effect of this in delivering a degree of modal shift away from the private car and reducing the volume of vehicular traffic crossing the Inner Ring Road into the City Centre. No soundness-related changes are needed in respect of JCS coverage of the City Centre.

Remainder of the urban area, including the fringe parishes

99. Referring briefly to policy 12, this is affected to a relatively small degree by the package of soundness-related changes concerning the ‘smaller sites’ allocations, as earlier discussed and recommended under issue 6.

The hierarchy of centres

100. Policy 19 establishes a hierarchy of centres for new retailing, services, offices and other town centre uses, recognising Norwich City Centre as the regional centre and working down through a series of identified ‘town and large district centres’, ‘large village and district centres’ and ‘local centres’. This is a sound framework for ensuring the promotion of vital and viable centres and broadly reflects national policy in PPS4 and the overall spatial strategy of the EEP.
101. Proposed soundness changes SC25-26 appropriately remove a lack of clarity over the options for meeting district centre/high street needs at the growth triangle and explain that this issue will be determined through the AAP.
102. Turning to the retail parks around the periphery of the city centre at Brazengate and Riverside, there is no convincing evidence that they form logical or appropriate parts of the primary retail area (PRA), especially having regard to their perceived separation (by the inner ring road and by distance respectively). Any future provision of additional comparison goods retailing should be concentrated in the PRA (wherever possible) in order to reinforce its vitality and vibrancy. The JCS appropriately re-classifies these two centres, a change which would not harm the city centre’s retail offer or the distinctive roles of the retail parks themselves. [MC113 helpfully clarifies and explains these reclassifications.]
103. Longwater Retail Park and the shops at Taverham do not meet the definition of a District Centre and there is no need for their classification as such. Policy 19 requires no further change in the interests of soundness.

Overall recommendations on Issue 7

To secure the soundness of the JCS in respect of policies 11-12 and 19 we recommend that it be changed as set out in SC25-26 (Appendix A).

Issue 8 Does the JCS provide a sound basis for future planning of the other ‘Main Towns’, and the identified ‘Key Service Centres’, ‘Service Villages’, and ‘Other Villages’?

Main Towns outside the NPA

104. Policy 13 provides sound strategic guidance for development in the main towns which lie outside the Norwich Policy Area, namely Aylsham, Diss and Harleston. These towns serve their own established hinterlands but are unlikely to attract large scale employers. Nonetheless, there is a need to

ensure that modest levels of growth are provided to meet the needs of the towns arising from their own particular demographic and household profiles and trends, thereby ensuring that they are able to retain their comparative competitive positions in relation to larger nearby towns.

105. The JCS proposes scales of housing growth that are appropriate to the needs of these towns - a minimum of 300 at both Aylsham and Diss and a range of 200-300 at Harleston. There are actively interested developers, particularly at Aylsham but also at Diss, and no constraints were identified as absolute showstoppers. Although various options are being explored for tackling the waste water treatment issues at Aylsham, the terms of the JCS policy caveat on this point are appropriate, pending the identification of a satisfactory and deliverable solution.
106. Detailed concerns over additional housing at Harleston and town centre linked issues at Diss can be addressed through the proposed Site Specific DPD and AAP respectively.

‘Key Service Centres’ (KSCs), ‘Service Villages’ (SVs) & ‘Other Villages’

107. JCS policies 14-16 establish a strategic framework for the provision of appropriate levels of housing and other development in three categories of settlement considered to be at a lower level in the settlement hierarchy than the main towns covered by policy 13. The evidence base for the classification of these settlements is summarised in TP7, which we find generally robust.
108. Policy 14 identifies KSCs with a range of services and facilities enabling them to meet the needs of local residents and those within surrounding areas. Except for Long Stratton (1,800 homes) and Hethersett (1,000 homes), the range of housing provision for most KSCs is about 100 to 200 homes.
109. In order to clarify some misunderstandings that arose among participants about the interpretation of the ranges in the policy and the wording of the accompanying text, SC19 and SC20 (part 1) introduce greater clarification about the circumstances in which the ranges could be exceeded. SC20 (part 2) clarifies paragraph 6.43, explaining that Blofield, Brundall and Hingham have lower allocations because of their more limited services and lack of a secondary school. SC21 introduces changes to what is said about Loddon, reflecting more recent information about constraints.
110. Subject to these effectiveness changes, policy 14 contains adequate specificity about the general levels of growth to be accommodated in the KSCs. Detailed issues concerning the possible potential of certain individual KSCs to exceed the figures quoted in the policy (or possible constraints requiring confinement within the range) are better explored in the context of the future Site Specific DPDs.
111. The allocation at Wroxham is not unreasonable, bearing in mind its proximity to the facilities of Hoveton, notwithstanding the capacity issues concerning the bridge over the Bure. The way in which the allocation is met is a matter for the Site Specific DPD.

112. Policy 15 identifies Service Villages (SVs). These have fewer services than KSCs but mostly have at least three out of the following four: primary school; food shop; journey to work public transport; and a village hall. Alternatively, they are close to a neighbouring village which has complementary facilities. Housing provision is generally within the range of 10 to 20 dwellings. SC22 secures effectiveness by introducing the necessary explanation that a limited number of SVs will need to be provided with settlement limits to be defined in the South Norfolk Site Specific Proposals DPD. SC23a clarifies ambiguity about the various tiers of additionality built into paragraph 6.58. SC23b deletes the final sentence of 6.59, recognising that the situation described would be very unlikely to occur, and thus making inclusion of the provision potentially misleading.
113. As in the case of KSCs, future Site Specific DPDs provide the best mechanism for exploring detailed issues about the possible potential of individual SVs to exceed the figures quoted in policy 15. We find no reason to recommend that Newton St Faith should be reclassified or ‘separated’ from Horsham St Faith for the purposes of this policy.
114. Policy 16 covers the even smaller range of identified villages which either already have, or will be provided with, defined development boundaries within which infilling or small groups of buildings will be permitted subject to form and character considerations. SC24 makes the JCS effective by providing necessary clarification in the form of a footnote identifying lists of villages which will either (a) be provided with settlement boundaries for the purpose of this policy through the preparation of the South Norfolk Site Specific Proposals DPD or (b) lose their present settlement boundaries, as currently defined on the Proposals Map, upon adoption of the JCS.
115. We find there to be insufficient evidence to justify reclassifying any of the settlements identified as ‘other villages’ in policy 16.
116. Policies 14-16 also state that settlements within the NPA may be considered for additional development to help deliver the ‘smaller sites in the NPA’ referred to in policy 9. The required soundness-related changes concerning these allocations are covered under Issue 6 above. These policies provide scope for the appropriate flexibility in relation to that allowance. More prescription on this issue in the JCS would be premature and require consideration of a level of detail not relevant to a core strategy.
117. Referring briefly to policy 17, inevitably some villages will be close to the margins of one classification and another. However, although Felthorpe has a village hall and a pub it lacks a primary school or village shop and we find no reason to disagree with the classification arrived at by GNPD on the basis of the criteria in TP7 which, as concluded above, provide robust evidence.

Overall recommendations on Issue 8

To secure the soundness of the JCS in respect of policies 14-16 we recommend that they be changed as set out in SC19-24 (Appendix A).
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Issue 9 Does the JCS provide a sound basis for planning adequate and timely provision of supporting infrastructure?

118. One of our initial soundness concerns was that all the infrastructure schemes identified in JCS Appendix 7 ('Implementation Framework') are said to be 'critical' to the JCS. The criticality of these dependencies is often unexplained in the JCS but it did not seem that all could be potential showstoppers, rendering the strategy unsound if there were not a reasonable prospect of their timely implementation. Some appeared to be more appropriately described as desirable or aspirational.
119. Since this concern was expressed GNDP has made progress in preparing a number of successive draft versions of the Local Implementation Plan and Programme (LIPP). Preparation of the LIPP is steered by regular meetings of a GNDP working group in discussion with service providers. This is intended to be a live working document, capable of being reviewed and updated regularly in order to provide a structured basis for monitoring and timely decision-taking on infrastructure issues. Having considered PPS12 and the PINS note 'Examining Development Documents: Learning from Experience', GNDP has now moved from use of the term 'critical' to a different terminology based on priorities. Priority 1 infrastructure is *'fundamental to the strategy or must happen to enable physical growth. Failure to deliver.....would require the strategy to be reviewed'*. Priority 2 items are *'essential to significant elements of the strategy and required if growth is to be achieved in a timely and sustainable manner'*. Priority 3 items are *'required to deliver the overall vision for sustainable growth but unlikely to prevent development in the short to medium term'*. Separate sections of the LIPP also identify 'spatial packages' of infrastructure linked to the various main growth locations, so that a much clearer picture emerges of the key dependencies in each case.
120. This revised approach to the categorisation of the identified infrastructure is included in the changes to policy 20 at SC27 and (more particularly) SC28, which replaces the submitted Appendix 7 with Appendix 3 of the LIPP. The latter now appropriately prioritises infrastructure connected with waste water, potable water, strategic green infrastructure (including the Broads Buffer Zone), electricity, and the transport network as Priority 1. The introduction to the changed appendix explains that the named schemes do not amount to a *'precise list of the entire infrastructure that will be needed by 2026..(that).. the programme will be developed through the LIPP...(and that)...the content, phasing and priorities of this list will be amended accordingly...via the LIPP process which will be subject to regular review.'*
121. These changes were generally welcomed and we support them with one reservation - that the colour-coded 'critical path' diagram should be omitted. We asked for that piece of evidence to be produced to help the examination understand the interrelationships between various sites and their connected infrastructure. While the diagram proved useful for that purpose, its inclusion in the new Appendix 3 would tend to elevate it to a status that it was not intended to serve, misleadingly cement its contents, and lead to too much reliance being placed upon it.
122. Although some parts of the new appendix will become out-of-date, it will always be possible to read-across to the 'latest situation' on infrastructure via

the current version of the LIPP. Overall, the replacement appendix will embed the infrastructure priorities more effectively in the JCS. There is no need to include further reference to joint working between GNPD and the private sector since it is already apparent from the JCS that this will be required.

Conclusion on Issue 9

123. Subject to exclusion of the critical path diagram, SC27-28 include all the changes necessary to make the JCS sound by providing a clearer, more appropriate, categorisation of the necessary infrastructure priorities and a transparent link with the on-going planning and monitoring mechanism of the LIPP.

Overall recommendation on Issue 9

To secure the soundness of the JCS in respect of its treatment of the infrastructure, we recommend that it be changed as set out in SC27-28 (Appendix A), except for the small change to SC27 set out in IC1 (Appendix B) as explained under Issue 6 and the exclusion from SC28 of the colour-coded ‘critical path’ diagram.

Legal Requirements

124. The table below summarises our examination of the compliance of the JCS with the legal requirements. We conclude that it meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The LDSs for Broadland and Norwich were both adopted in 2010 and include valid profiles of the JCS. Although the hearings began later than expected, adoption could take place at around the time stated in those LDSs. The South Norfolk LDS, adopted in 2007, also included a brief profile of the JCS but expected submission in January 2009. Despite this, and the delayed start to the hearings, adoption could take place not much more than 6 months later than expected in the South Norfolk LDS.
Statement of Community Involvement (SCI) & relevant regulations	The Broadland SCI was adopted in April 2006 (with an update of October 2008), that for Norwich in January 2007, and that for South Norfolk in February 2007. We find no reason to disagree with the conclusions of the GNPD Statement of Compliance, dated November 2009, that consultation at all stages of the preparation of the JCS has been generally compliant with the requirements in the SCIs. Non-statutory consultation has also taken place on the Focussed Changes (FCs) and the Inspectors’ Changes (ICs). Much disquiet and dissatisfaction was expressed by some District and Parish Councillors, public groups and individuals that the members of the GNPD Policy Group chose not to open their meetings to other elected members and the general public. The policy group comprises

	members appointed from the leading parties of the GNDP’s constituent authorities to consider the content of the JCS at every stage of its evolution and make joint recommendations to the Councils. However, the group is not a decision-taking ‘joint committee’ constituted as a local planning authority under S29-31 of the 2004 Act, and its recommendations have always been referred to the individual Councils to consider and decide according to their particular adopted processes, practices and timetables. In that sense the roles of the local planning authorities have not been usurped, although we do not dismiss the public sense of exclusion, confusion, frustration and dissatisfaction that has clearly been engendered by GNDP’s chosen method of working. Nevertheless, it is not for us to rule upon issues of ‘best practice’ on methods of decision-taking including the admission or otherwise of the public to working group meetings or the scrutiny and decision-taking processes of the constituent authorities. Criticisms were also made that reports to the working group (and minutes of their discussions) have not always been made available, that the JCS website contained little explanatory information at the various stages of plan preparation until relatively recently, and that opportunities to participate have been curtailed, all contrary to the Aarhus Convention. We understand the difficulties that individuals may have experienced at particular times but are satisfied that a sufficient paper trail of information about the workings of the Group eventually formed part of the evidence base for the examination and that by the time of the examination the website contained the relevant information in a reasonably user-friendly form. The processes and procedures of preparing a strategy catering for major growth and involving the entire areas of 3 local planning authorities have necessarily been long and complex and were not aided by a change in the regulations in 2008. It may be that improvements could have been made, especially with the benefit of hindsight. However, in our view the JCS is legally compliant in terms of the opportunities for public participation and engagement, including the principles set out in PPS12 (paras 4.19-26).
Sustainability Appraisal (SA)	SA has been carried out at every key stage of the preparation of the JCS.
Appropriate Assessment (AA)	A report on Task 2 Appropriate Assessment was published in February 2010. This followed a Task 1 assessment which deemed it uncertain whether or not effects would be significant in terms of the EC Habitats Directive. The Task 2 assessment deemed it highly unlikely that the JCS policies would have a significant direct or indirect impact on European and Ramsar designated sites, although uncertainty remained with regard to the potential in-combination and cumulative effects associated with water

	resources, water efficiency, growth and tourism resulting from the JCS growth proposals. This was because of dependence on the implementation of effective mitigation measures. However, it concluded that uncertainty could be reduced and any significant effects avoided through the implementation of green infrastructure developments, the allocation through AAPs of greenspace to protect specific natural assets and designated sites and the implementation of water infrastructure improvements and water efficient measures. These issues were covered in the hearings and are mentioned at relevant points in this report under the assessment of soundness. Some of the recommended soundness changes include greater certainty with regard to these points.
National Policy	The JCS complies with national policy except where changes are recommended in that respect in the assessment of soundness.
Sustainable Community Strategy (SCS)	The JCS pays satisfactory regard to the SCSs of the GNDP constituent authorities, including that of the County Council.
2004 Act and Regs (as amended)	The JCS complies with the Act and the Regulations.

Overall Conclusion and Recommendation

125. We conclude that with the changes proposed by GNDP (set out in Appendix A), together with those recommended by us (set out in Appendix B), the Joint Core Strategy for Broadland, Norwich and South Norfolk satisfies the requirements of s20(5) of the 2004 Act and meets the determinants of soundness set out in PPS12. We therefore recommend that it be changed in accordance with Appendices A and B. For the avoidance of doubt, we endorse GNDP’s proposed minor changes, as set out in Appendix C.

Roy Foster

Mike Fox

Lead Inspector

Assistant Inspector

This report is accompanied by three separate documents:

Appendix A GNDP changes that go to soundness

Appendix B Inspectors’ changes that go to soundness

Appendix C GNDP schedule of minor changes

Joint Core Strategy for Broadland, Norwich and South Norfolk

APPENDIX A

Schedule of retained Focussed Changes and proposed Soundness changes arising from the Examination in Public hearings 9 November 2010 – 9 December 2010.

Reference	Page No.	Paragraph/ Policy	Proposed Change	Reason for Change
Retained Focussed Changes				
FC 1	Page 41	Policy 4	In Policy 4, delete: Affordable housing A proportion of affordable housing, including an appropriate tenure-mix, will be required on site in accordance with the most up-to date needs assessment for the plan area, for sites of five or more dwellings (or 0.2 hectares or more). At the adoption of this strategy the target is 40% based on the most recent assessment. In negotiating the proportion and tenure of affordable housing, account will be taken of site characteristics and the economic viability of provision. Where viability is an issue financial support will be sought via public subsidy, such as through the Homes and Communities Agency (HCA). At appropriate settlements, sites that would not normally be released for housing will be considered for schemes that	To clarify the policy approach, and give more emphasis to the recognition that housing development viability is critical to the delivery of affordable houses on mixed tenure developments, taking into account the study of affordable housing viability undertaken by Drivers Jonas Deloitte. To clarify that where viability of the development is shown to be at risk, negotiations will include consideration of reducing

Reference	Page No.	Paragraph/ Policy	Proposed Change	Reason for Change
			specifically meet an identified local need for affordable homes. Such schemes must ensure that the properties are made available in perpetuity for this purpose.” Replace with Affordable housing A proportion of affordable housing, including an appropriate tenure mix, will be sought on all sites for 5 or more dwellings (or 0.2 hectares or more). The proportion of affordable housing, and mix of tenure sought will be based on the most up to date needs assessment for the plan area. At the adoption of this strategy the target proportion to meet the demonstrated housing need is: • On sites for 5-9 dwellings (or 0.2 – 0.4 ha), 20% with tenure to be agreed on a site by site basis (numbers rounded, upwards from 0.5) • On sites for 10-15 dwellings (or 0.4 – 0.6 ha), 30% with tenure to be agreed on a site by site basis (numbers rounded, upwards from 0.5) • On sites for 16 dwellings or more (or over 0.6 ha) 40% with approximate 85% social rented and 15% intermediate tenures (numbers rounded, upwards from 0.5) The proportion of affordable housing sought may be reduced and the balance of tenures amended where it can be demonstrated that site characteristics, including infrastructure provision, together with the requirement for affordable housing would	the overall amount of affordable housing sought, and the balance of tenures within the affordable housing to restore the viability of the scheme. To clarify that, as part of the consideration of viability, the potential for public subsidy will be investigated.

Reference	Page No.	Paragraph/ Policy	Proposed Change	Reason for Change
			render the site unviable in prevailing market conditions, taking account of the availability of public subsidy to support affordable housing. At appropriate settlements, sites that would not normally be released for housing will be considered for schemes that specifically meet an identified local need for affordable homes. Such schemes must ensure that the properties are made available in perpetuity for this purpose.”	
FC 2	Page 44	Policy 4, Supporting text	In paragraph 5.29, delete the following text “In some instances providing 40% affordable housing on-site will not be viable, without public subsidy. In such circumstances a financial contribution, such as a grant from the Homes and Communities Agency (HCA), will be sought. In order to create mixed communities, affordable housing provided as part of a market development will be expected to be integrated within the site.” Replace with “It is recognised that affordable housing provided through developer contributions in this way is dependent upon the overall viability of development. In some instances providing 40% affordable housing on-site will not be viable, without public subsidy. A study of affordable housing viability has concluded that smaller sites in particular may not be viable if the full 40% target were applied, but that in the market conditions prevailing in mid 2010, the 40% affordable housing target is achievable in a significant number of the scenarios modelled without social housing grant. Where this proves not to be the case financial	To take account of the proposed focussed change FC1 and the conclusions of the Assessment of Affordable Housing Viability undertaken by Drivers Jonas Deloitte.

Reference	Page No.	Paragraph/ Policy	Proposed Change	Reason for Change
			contribution, such as a grant from the Homes and Communities Agency (HCA), will be sought. Where it can be demonstrated that the target requirement for affordable housing would make a site unviable in prevailing market conditions, taking into account policy aims relating to the environmental standards of homes, and there are insufficient public funds available to support affordable housing, a reduced proportion of affordable homes and/or an amended mix of tenures will be negotiated. In order to create mixed communities, affordable housing provided as part of a market development will be expected to be integrated within the site.”	
FC 3	Page 44	Policy 4, supporting text	In paragraph 5.28 delete the following “Affordable housing is defined as ‘housing provided for rent, sale or shared equity at prices permanently below the current market rate, which people in housing need are able to afford’. The EEP has a regional target for 35% of all housing to be affordable and recognises higher targets may be required locally. The findings of the most recent housing needs assessment for the three districts indicates that 43% of overall housing need can only be met by affordable housing. Experience locally shows that 40% is the maximum achievable on sites without subsidy, in normal market conditions. A large amount of residential development is expected to take place on smaller sites in both urban and rural locations. If the PPS3 threshold of 15 dwellings were to be applied then a further significant undersupply of affordable dwellings would result. Consequently, in order to make realistic inroads into the identified need and provide affordable housing across a wide range of sites 40% affordable housing will be sought on all sites of 5 units or more.	To take account of the Government’s intended revocation of the Regional Spatial Strategy (East of England Plan) and to introduce a plan wide target for the provision of affordable housing into the plan which meets the requirements of PPS3 that the provision of affordable housing should meet the needs of current and future occupiers taking into account the Strategic Housing Market Assessment. The requirement that account should be taken of

Reference	Page No.	Paragraph/ Policy	Proposed Change	Reason for Change
			Replace with 5.28 Affordable housing is defined as ‘housing provided for rent, sale or shared equity at prices permanently below the current market rate, which people in housing need are able to afford’. 5.28A Based on the most recent assessment of housing need, there is a need in the plan area as a whole for about 11,860 affordable homes with approximately 60% of these being social rented, and 40% intermediate tenures from 2008 to 2026. This is derived from the annual net requirement for new affordable houses extrapolated over the plan period, and the backlog existing at the time of the housing needs assessment, with allowance made for the affordable housing provided up to the base date of this strategy. This represents just over 33% of the total housing requirement set out in the table above. 5.28B The most recent housing needs assessment for the three districts indicates that, in the short term, 43% of overall housing need can only be met by affordable housing. The policy target of 40% for * affordable housing on qualifying sites takes account of local experience which suggests that 40% is the maximum achievable on sites without subsidy in normal market conditions, the expectation, of the Government’s basic needs assessment model within the Government’s guidance,** that current backlogs will be addressed in the short term, and the fact that not all sites will deliver the target percentage, for example because of viability issues, or previous planning policies in the case of sites with permission at the base date. The assessment of	viability and likely levels of finance available is recognised in FC1 and FC2, but in a volatile market, such factors are hard to quantify in the long term. To take account of the findings of the affordable housing viability study undertaken by Drivers Jonas Deloitte NB Bold amendments made following Focussed Change consultation: *For consistency with the proposed policy taking into account the graduated target on small sites **Correction of wording

Reference	Page No.	Paragraph/ Policy	Proposed Change	Reason for Change
			housing need also indicates that the current split of affordable tenures required to meet need in the short term, taking into account the current backlog, is approximately 85% social rented / 15% intermediate tenures, with the greatest need for social rented accommodation related to the Norwich urban area. The overall target, policy target, and balance of tenures will be kept under review in the light of updated information on housing need. 5.28C A large amount of residential development is expected to take place on smaller sites in both urban and rural locations. If the PPS3 threshold of 15 dwellings were to be applied then a further significant undersupply of affordable dwellings would result. Consequently, in order to make realistic inroads into the identified need and provide affordable housing across a wide range of sites a proportion of affordable housing will be sought on all sites of 5 units or more.”	
FC 4	44	Policy 4, supporting text	At end of Paragraph 5.30 add “On the evidence of recent achievements and the programme schemes in mid 2010, this is likely to produce about 1170 affordable homes between 2008 and 2026, though this is subject to the availability of funding.”	To give an indication of the potential contribution of Exceptions sites to meeting local housing need.
FC 6	44-45	Policy 4, supporting text	a) Delete paragraph 5.32, and replace with "A partial revision to the East of England Plan in 2009 set requirements for the provision of pitches to met the needs of Gypsies and Travellers in accordance with the requirements of Government Circular 01/2006. The target set was for 58 net additional pitches across the GNDP area to be provided by	To take into account the Government’s intention to abolish the Regional Spatial Strategy, to substitute an appropriate locally supported target, and to indicate a

Reference	Page No.	Paragraph/ Policy	Proposed Change	Reason for Change
			2011. Beyond this the East of England Plan set an approach to longer term provision based on extrapolation which equated to a need for an additional 78 pitches between 2012-2026. The targets up to 2011 were broadly supported by the Greater Norwich Development Partnership authorities who considered them reasonable in the light of the Norfolk wide Gypsy and Traveller Accommodation Needs Assessment undertaken in July, 2007. However, beyond 2011 the proposed approach was disputed and the local authorities consider this level of need would be better determined by updated local evidence. It should be noted that a pitch represents a family unit and may therefore accommodate more than one caravan. On average about 1.7 caravans occupy each pitch. Since 2006, 11 pitches have been permitted or completed in Broadland, 14 in South Norfolk and an application for a further 3 is pending in Norwich." b) Delete Paragraph 5.35	mechanism for updating the target. The intention to abolish the Regional Spatial Strategy makes the explanation in Paragraph 5.35 unnecessary.
FC 7	45	Policy 4, Para 5.36	Delete paragraph 5.36, and replace with "There is a large existing site for Travelling Show People in Norwich, which is fully occupied, and local evidence suggests there is a need for further accommodation. Each plot will need to include room for vehicles providing accommodation and also for the maintenance and storage of fairground rides and equipment."	To take into account the Government's intention to abolish the Regional Spatial Strategy, and to substitute an appropriate locally supported target.

Reference	Page No.	Paragraph/Policy	Proposed Change	Matter no.
Proposed Soundness Changes				
SC 1	32	Policy 1	Policy changes: a) Remove both instances of the word “significant” from paragraph 1 of column 2 of Policy 1. b) Insert new paragraph 2 in column 2 of policy 1: “Development likely to have any adverse effect on nationally designated sites and species will be assessed in accordance with national policy and legislation.”	8
SC 2	33	5.6	Amend paragraph 5.6 last sentence an ecological network as illustrated by the map on page x which includes: Amend last bullet to “corridors and stepping stones through green infrastructure improvements” <i>Add new map Biodiversity Enhancement Areas (RF25a)</i>	8
SC 3	34	5.8	a) Delete word “significant” from last sentence. b) Insert new sentence at end of paragraph 5.8. “These internationally designated sites are protected under the Habitats	8

Reference	Page No.	Paragraph/Policy	Proposed Change	Matter no.
			Regulations. To reflect the findings of the Habitats Regulation Assessment of the JCS, the policy places a particular focus on their protection in relation to water quality, water resource and visitor pressures.”	
SC 4	34 and 35	Additional paragraph following 5.8	Insert paragraph after 5.8 to refer to Green Infrastructure map. “A proposed green infrastructure network (see map) for the whole Greater Norwich area has been identified to inform more detailed policies elsewhere in LDFs and the green infrastructure priority areas supporting growth locations set out on page 69.” Delete diagram on page 35 and insert new diagram to replace it: <i>Proposed Green Infrastructure Network</i> (RF25b)	8
SC 5	37	Paragraph 5.12	Amend the sentence beginning “Initially” to read: At least a “silver standard” will be expected. Though achieving the highest level is not a policy requirement, it is anticipated that over time an increasing proportion of development will achieve the “gold standard”	8
SC 6	39	Paragraph 5.16	For clarity a) After the word “contributions” insert “through Section 106” b) Insert new sentence at end of paragraph 5.16 “In the circumstances where viability is a concern in relation to the energy policy requirements, applicants will need to demonstrate this through “open book accounting” similar to that set out for affordable housing.”	8
SC 7	38	Policy 3	Policy changes: Make soundness related changes to policy 3 First paragraph:	

Reference	Page No.	Paragraph/Policy	Proposed Change	Matter no.
			Replace “renewable energy” with “decentralised and renewable or low carbon energy” Bullet point 1; Replace “dedicated, contractually linked renewable sources” with “dedicated decentralised and renewable or low carbon energy sources” Replace “renewable energy infrastructure” with “decentralised and renewable or low carbon energy infrastructure” Bullet point 2: Replace “renewable sources” with “decentralised and renewable or low carbon energy sources”	
SC 8	42	Policy 4	a) Amend last sentence of final paragraph from: “These will be located on sites within the Norwich urban area, or if sites within the urban area cannot be identified, close to it.” To: “These will be located on sites within the Norwich urban area, or if sites within the urban area cannot be identified, with easy access to it.” b) Add additional paragraph at end of Policy 4 to read: “The Government has signalled its intention to revoke the Regional Spatial Strategy. When this is enacted new targets for permanent residential and transit pitches for the period after 2011 will be set, based on local evidence.”	FC 5 not proceeded with but current status of RSS still necessitate s amendment
SC 9	49	5.44	Add sentence: “The corridor currently protected (100m either side of the centre line of the current scheme) and the associated Postwick Hub will be shown on the Broadland District Council adopted Proposals Map”	1b
SC 10 a	56	Policy 9	Clarify smaller sites allowance and re-order bullets for clarity delete existing policy.	10

Reference	Page No.	Paragraph/Policy	Proposed Change	Matter no.
			Revise text in first column preceding paragraph commencing, “Transport infrastructure required to implement NATS...” to read: “The Norwich Policy Area (NPA) is the focus for major growth and development. Housing need will be addressed by the identification of new allocations to deliver a minimum of 21,000 dwellings distributed across the following locations: • Norwich City Council area: 3,000 dwellings • Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle: 7,000 dwellings by 2026, continuing to grow to around 10,000 dwellings eventually • Easton/Costessey: 1,000 dwellings • Cringleford: 1,200 dwellings • Hethersett: 1,000 dwellings • Long Stratton: 1,800 dwellings • Wymondham: 2,200 dwellings • Broadland smaller sites in the NPA: 2,000 dwellings • South Norfolk smaller sites in the NPA and possible additions to named growth locations: 1,800 dwellings Allocations to deliver the smaller sites in Broadland and South Norfolk will be made in accordance with the settlement hierarchy and local environmental and servicing considerations. All of the numbers above show the minimum number of dwellings to be delivered in each location.”	
SC 10 b	56	Add to 2 nd bullet relating to	Add text: “In view of the specific nature of the employment sought in this location,	EIP79

Reference	Page No.	Paragraph/Policy	Proposed Change	Matter no.
		employment locations (i.e. UEA/ NRP)	including the need to dovetail with the aims of significant and diverse existing institutions, detailed proposals will be developed through the preparation of development plan documents”	
SC 11	57	New paragraph after 6.5	Insert new paragraph after paragraph 6.5 to explain the means of providing for the smaller sites allowance to say, “The smaller sites allowance is intended to provide a balance between site sizes and locations to encourage flexibility and the shorter term delivery of new housing. The locations of the smaller sites will be decided in accordance with the settlement hierarchy defined in paragraphs 6.2 and 6.3. The smaller sites will be less than the 1000 dwellings or more identified at strategic growth locations, and will reflect the scales of development provided for at each level of the settlement hierarchy described in policies 12, 14, 15 and 16. The allocations will be dependent upon the availability and suitability of sites proposed through the Site Specific Policies and Allocations Development Plan Document production process, and will reflect the form, character and services capacities of each locality. “	10
SC 12	62	Policy 10, Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle	Amend second sentence of first paragraph to read: “Delivery of the growth triangle in its entirety is dependent on the implementation of the Northern Distributor Road. “	GNDP response (RF97) to Inspectors question (RF75)
SC 13	63	Policy 10, Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle bullet 2	Amend 2nd bullet from “a district centre based around an accessible ‘high street’ and including a new library, education and health facilities. The development will also require new local centres” To “a district centre based around an accessible ‘high street’ and including a new library, education and health facilities. This may be provided by building on the proposed centre at Blue Boar Lane or by the creation of a second district	6

Reference	Page No.	Paragraph/Policy	Proposed Change	Matter no.
			centre elsewhere in the Growth Triangle. The development will also require new local centres”.	
SC 14	63	Policy 10, Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle	Insert additional sentence into final paragraph of column 2 to read: “A single co-ordinated approach will be required across the whole area. <i>This will be provided through the preparation of an Area Action Plan (or any future equivalent process)</i> . More detailed masterplanning will be required for each quarter.”	GNDP response (RF97) to Inspectors question (RF75)
SC 15	66-67	Paragraph 6.18	Amend paragraph from: “To implement the JCS significant highway improvements are required at the Longwater (A1074), Thickthorn (A11) and Harford (A140) junctions on the A47 Norwich Southern Bypass. Completion of the Northern Distributor Road and improvements to Postwick junction are a fundamental requirement for growth and the implementation of the remainder of the Norwich Area Transportation Strategy including public transport enhancements. Completion of a bypass is a pre-requisite for the scale of growth identified in Long Stratton.” To: “To implement the JCS significant highway improvements are required at the Longwater (A1074), Thickthorn (A11) and Harford (A140) junctions on the A47 Norwich Southern Bypass. Completion of the Northern Distributor Road <i>is fundamental to the full implementation of this Joint Core Strategy. In particular it is necessary to allow significant development in the growth triangle and the full implementation of the remainder of the Norwich Area Transportation Strategy. The completion of appropriate improvements at Postwick junction would allow for some development in the Old Catton, Sprowston, Thorpe St Andrew growth triangle in advance of the NDR (see</i>	GNDP response (RF97) to Inspectors question (RF75)

Reference	Page No.	Paragraph/Policy	Proposed Change	Matter no.
			supporting text for Policy 20). Completion of a bypass is a pre-requisite for the scale of growth identified in Long Stratton.”	
SC 16	68	After paragraph 6.23	Add additional new paragraph to supporting text to clarify Policy 10, first paragraph, second sentence The Policy provides for new communities and a wide range of development. Consequently the provision of new services and infrastructure will also have wider benefits for existing communities. The Policy aims in this respect do not require developers to directly fund existing deficiencies	
SC 17	74	Policy 12	Following policy second paragraph reading “Throughout the suburban area and fringe parishes opportunities will be sought:”, insert new bullet point to become the first bullet point to read, “to identify land to contribute towards the smaller sites allowance set out in Policy 9”	10
SC 18	79	Settlement Hierarchy map	Revise Key label “Norwich Urban Area” to read “Norwich Urban Area including urban fringe parishes” and relocate to the head of the settlement hierarchy beneath new heading “ Settlement Hierarchy” with roads and railway symbols moved to form part of general map key, in order to give added clarity to the complete hierarchy	10
SC 19	80	Policy 14	first paragraph/ second line - delete “broadly”	10
SC 20	80	Paragraph 6.43	Amend final sentence to read “The KSCs with more limited services and lacking a secondary school have the lowest housing allocations, i.e. Blofield, Brundall and Hingham.” Add a new paragraph following 6.43 to read, “Where a range is specified, the scale of new development is expected to be within the range. In exceptional circumstances, a range may be exceeded where it can clearly be demonstrated that the resulting development would respect the form and character of the	10

Reference	Page No.	Paragraph/Policy	Proposed Change	Matter no.
			settlement and bring sustainability benefits for the existing population as well as providing for new residents. This might, for example, be through improved local facilities, or connections to them, or through meeting other defined local needs.”	
SC 21	81	6.51	Delete the last sentence, “Improvements to sewage treatment works may require phasing.” Revise the fourth sentence to read, “New development of 100-200 dwellings is proposed to 2026 which may require the small scale expansion of all local schools.”	10
SC 22	84	Policy 15	Add footnote (in separate box) as below: “This policy will necessitate a number of changes to the adopted proposals maps for South Norfolk. New settlement limits will be needed for Alburgh, Bergh Apton, Bramerton and Carleton Rode. These will be defined through the preparation of the South Norfolk Site Specific Proposals Development Plan Document”	EIP79
SC 23 a	85	6.58	Last sentence – delete wording “Service villages in the NPA may also be considered for additional allocations” and replace with, “Further allocations may be considered in Service Villages in the NPA “	10
SC 23 b	85	6.59	Delete second sentence	10
SC 24	86	Policy 16	Add footnote (in separate box) as below: “N. B. This policy will necessitate a number of changes to the adopted proposals maps for Broadland and South Norfolk. New settlement limits will be needed for Aldeby, Burgh St Peter, Caistor St Edmund, Claxton, Colton, Denton, Flordon, Forncett St Mary, Great Melton, Hardwick, Hedenham, Keswick, Ketteringham, Langley Street Marlingford, Shotesham, Starston, Swainsthorpe, Tibenham, Tivetshall St Margaret, Tivetshall St Mary, Toft Monks, and Topcroft Street.	

Reference	Page No.	Paragraph/Policy	Proposed Change	Matter no.
			These will be defined through the preparation of the South Norfolk Site Specific Proposals Development Plan Document A limited number of existing settlement limits shown on the adopted proposals maps for Broadland and South Norfolk will be deleted. This applies to Felthorpe, Honingham, Upton, Ranworth, Wacton, Weston Longville and Woodbastwick. The policy change making this necessary will take effect on adoption of the Joint Core Strategy”	
SC 25	89	Policy 19, point 3.	Delete text and replace with: The large village and district centres of: Acle, Coltishall, Hethersett, Hingham, Loddon, Long Stratton, Poringland and Reepham, and within the Norwich urban area at Aylsham Road, Drayton Road, Bowthorpe, Dereham Road, Eaton Centre, Earlham House, Larkman centre, Plumstead Road, Old Catton and Dussindale (Thorpe St Andrew). New district centres/high streets to be established at Blue Boar Lane, Sprowston and Hall Road, Norwich. The Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle will be served by a district centre. This may be provided by building on the proposed district centre at Blue Boar Lane or the creation of a second district centre elsewhere in the Triangle as determined through the Area Action Plan for the Growth Triangle.	
SC 26	89	6.74	Add sentence to end of paragraph. “This may be through building on the proposed centre at Blue Boar Lane or the creation of a second district centre elsewhere in the Growth Triangle. This will be determined through the Area Action Plan for the area”.	6
SC 27	90	Policy 20	Replace Policy 20 with the following text:	4 and GNDP response (RF97) to Inspectors

Reference	Page No.	Paragraph/Policy	Proposed Change	Matter no.
				question (RF75)

Implementation and Monitoring

Policy 20 applies to the whole strategy area

Policy 20 Implementation

A coordinated approach will be taken to the timely provision and ongoing maintenance of infrastructure, services and facilities to support development.

Provision will be achieved through:

- contributions towards strategic infrastructure from all residential and commercial development, made through the introduction of an area wide community infrastructure levy plus appropriate Section 106 contributions for site specific needs. Until such a time as a local CIL is introduced, all contributions will be made through Section 106 in line with current legislation and national policy, including the pooling of contributions.
- maximising mainstream Government funding sources including the Homes and Communities Agency, Local Transport Plan, Growth Point Funding, Regional Funding Allocation and Community Infrastructure Funding and other new funding streams, including European funding sources
- co-ordination with the investment programmes of other public bodies e.g. National Health Service
- capital investment by utilities companies through their asset management plans to their regulator which identify the capital investment required
- innovative approaches to capital investment based on forecast future revenue
- consideration of other potential funding mechanisms

Local Planning Authorities and the County Council will make use, where necessary, of their legal powers to bring about strategically significant development, including compulsory purchase.

Future maintenance of the infrastructure provided will be achieved either through adoption by a public body with maintenance payments, where appropriate, or other secure arrangements such as the establishment of a local infrastructure management body.

Implementation of this Joint Core Strategy will depend on the co-ordinated activities of a number of agencies. It is essential that necessary infrastructure is provided in a timely manner related to the needs of new development. The precise timing will be carried out through reviews of the delivery programme, but the underlying principles will be to provide attractive, sustainable communities, to avoid placing an undue strain on existing services and to ensure that residents of new developments do not form patterns of behaviour which ultimately threaten the viability of new services.

Infrastructure that is essential to secure sustainable development will include:

- appropriate transport infrastructure including the implementation of NATS and the construction of the NDR and improved public transport
- affordable or supported housing
- social infrastructure, including education, healthcare, police and emergency services, community facilities
- local and renewable energy generation
- water conservation measures
- sustainable drainage systems (SuDS)
- strategic sewers
- open space and green infrastructure, including habitat creation, pedestrian and cycle links, allotments, recreation facilities, parks, trees, hedgerows, woodland and landscaping
- utilities, including waste management/ recycling/composting facilities
- street furniture
- public art

The developers of strategic growth areas will be required to enter into an ongoing commitment to support community development to bring about a genuinely sustainable community including fostering the growth of community and voluntary organisations.

7.1 This Joint Core Strategy has been formulated on the basis of implementing the major growth in housing and employment so that they are coordinated with relevant infrastructure, services and facilities. It is not the intention of this JCS to permit housing growth

to outstrip and be developed in advance of supporting employment and a full range of hard and soft infrastructure.

- 7.2 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 Joint Core Strategy in partnership with stakeholders. The programme will be implemented through the Local Investment Plan and Programme (LIPP) or any successor delivery plan, and will be regularly updated. The key elements of the programme are set out in the draft Implementation Framework in Appendix 7.
- 7.3 Significant and timely investment will be required to implement the JCS. Developer contributions will be sought through a combination of a Community Infrastructure Levy (CIL) and planning obligations. The CIL will apply to both residential and commercial development. Until a locally derived CIL has been implemented local authorities in the Greater Norwich area will continue to use planning obligations through S106, including pooling when appropriate and in accordance with current practice and legislation.
- 7.4 The CIL will be set at a level that does not undermine the viability of development. Studies identify that the cost of required infrastructure is likely to exceed expected income from all sources. The GNDP will address the implications of any funding gap for the infrastructure delivery programme, including prioritisation and seeking additional funding from government. It will seek to maximise investment from mainstream public sector funding and explore innovative ways to fund infrastructure investment. Other funding streams might include:
- The New Homes Bonus
 - Tax Increment Financing (TIF)
 - Regional Growth Fund
- 7.5 It is the GNDP's intention to submit a charging schedule in accordance with the regulations. The GNDP will regularly review the infrastructure needs of this Joint Core Strategy and development values, updating the charging schedule as necessary. Between these reviews, the CIL will be index-linked as set out in the regulations.
- 7.6 The GNDP will expect utility providers to ensure that their asset management plans take full account of the infrastructure needed to accommodate the development proposed in this JCS.

Monitor and Manage

- 7.8 The monitoring framework in Appendix 8 includes performance indicators and targets to assess how the Joint Core Strategy's objectives are being met. Some of these indicators are core output indicators, which the Government require us to collect. The other local indicators have been developed to address matters relevant to this area. Many of the indicators derive from the Sustainability Appraisal.
- 7.9 Contextual indicators are also used. These illustrate wider objectives such as for health and education. A Local Area Agreement has been established in Norfolk and a set of 35 indicators prioritised reflecting the key local concerns relating to the area's well being. These indicators are published separately.
- 7.10 The Greater Norwich Development Partnership will publish an Annual Monitoring Report (AMR). The AMR is a check on the performance of the Joint Core Strategy and gives the opportunity to adjust policies and review objectives and to revise the Local Development Scheme. The outcomes will inform the need for reviews of the LIPP, this JCS and other Local Development Documents.

Review

- 7.11 The Joint Core Strategy is dependent on significant investment in supporting infrastructure. New development will contribute to this. However, the provision of infrastructure beyond that normally provided as part of the development will need the active co-operation of and investment by other agencies. These include utility companies, health care providers, central and local government, the Highways Agency and rail providers. Every effort will be made to ensure appropriate and timely supporting infrastructure is delivered. In the event of a critical shortfall, the Joint Core Strategy will be reviewed.

Contingency

- 7.12 The GNDP will be working to bring forward all growth proposals and associated infrastructure as early as possible to maximise

delivery and flexibility. This will be facilitated by engagement with developers to understand opportunities, overcome constraints and maximise development potential without compromising quality.

- 7.13 There is no phasing of growth in the JCS beyond that imposed by the provision of infrastructure. At the time of adoption the provision of most critical elements of infrastructure is not expected to be a significant constraint. However, there remains some uncertainty around the timing of the delivery of the Northern Distributor Road (NDR). The NDR is fundamental to overall delivery of housing and employment growth in the Broadland part of the NPA and to significant parts of NATS including high-quality public transport in the northern part of the urban area. At the base date of the JCS there is a significant housing commitment that is unaffected by infrastructure constraints. Delay in delivering the NDR does not prevent JCS provision of housing or employment development within Norwich City or South Norfolk Council areas, or existing housing commitment in Broadland as demonstrated in Appendix 7. Indeed, market pressures are likely to bring forward development in these locations in this scenario. The existing commitment and the range and scale of growth proposals across the JCS area provide significant flexibility to bring forward growth in those locations unaffected by infrastructure constraints.
- 7.14 In late 2010 proposals for Postwick were significantly advanced. The scheme and associated development has planning permission and the design of the layout of the junction has been agreed by the Highways Agency. The Postwick Hub and the Northern Distributor Road are in the DfT Development Pool and the funding decision will be announced by the end of 2011. The NDR will be subject to a separate statutory planning process.
- 7.15 The Postwick Hub can be delivered as a separate scheme and is not necessarily dependent on DfT funding. Contributions from all of the following sources may be used to secure delivery:-
- DfT development pool (decision due by end of 2011)
 - Existing Growth Point funding
 - Pooled Section 106 (until replaced by CIL)
 - CIL (expected to be introduced late 2011)
 - Local Authorities' capital funding programmes
 - New Homes Bonus
 - Tax Increment Financing
 - Other funding streams
- 7.16 The existing commitment of 1400 dwellings in the Sprowston Fringe can take place without improvements to Postwick Junction.

Subject to acceptable improvements to Postwick Junction (Postwick Hub or a suitable alternative) there is significant potential for further development in the growth triangle before there is confirmation of the timing of delivery of the NDR. The table below summarises the current understanding of this potential.

Location	Level of growth supported by current evidence	Constrained development
Growth Triangle	At least 1600 dwellings (plus 200 exemplar at Rackheath prior to Postwick junction improvements)	New employment allocation at Rackheath
Smaller sites in Broadland NPA	Delivery of the smaller sites allowance will be dealt with on a site by site basis	
Broadland Business Park	Development of existing allocation and new allocation (approx 18ha incl c50,000m2 B1)	
Airport area		New employment allocation

- 7.17 Broadland District Council is committed to preparing an Area Action Plan (AAP) for the growth triangle. As part of the preparation of this AAP there will be an investigation of the potential to enable further growth over and above that shown in Table 1 above, in advance of confirmation of timing of the NDR. This analysis would need to cover capacity of all local infrastructure (not just road capacity), the implications of particular sites, and the nature of development proposed. It will be essential that the growth is delivered in accordance with the overall strategy, taking into account its wider impact across the Norwich area, including a full range of infrastructure provision, services and high-quality public transport, walking and cycling.
- 7.18 Development beyond the pre-NDR threshold established through the AAP process will not be possible without a commitment to the NDR. If there is no possibility of the timely construction of the NDR, a complete review of the JCS would be triggered.

Reference	Page No.	Paragraph/Policy	Proposed Change	Matter no.
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Reference	Page No.	Paragraph/Policy	Proposed Change	Matter no.
SC 28	112	Appendix 7	Replace with Appendix 3 of EIP 84, suitably updated with GI projects identified in Policy 10, waste water and police services. Appendix on following page.	4

Appendix 7: Implementation Framework and Critical Path

The framework lists infrastructure required to facilitate development promoted in this JCS. It is early work and is not intended to be an exhaustive or precise list of the entire infrastructure that will be needed by 2026. Additional infrastructure will be needed beyond this date, including in the growth triangle where 3,000 dwellings are proposed after 2026. The GNDP will manage a delivery programme supporting the implementation of this Joint Core Strategy. The programme will be developed through the Local Investment Plan and Programme (LIPP). As decisions are made locally and nationally on prioritisation and funding of infrastructure, the content, phasing and priorities of this list will be amended accordingly. This will happen via the LIPP process which will be subject to regular review.

The definition of the three levels of priority is derived from the Greater Norwich Infrastructure Needs and Funding Study (INF 1; in particular see Page 194) but expands the Study's definition to explicitly recognise the differential impact on the overall strategy. Consequently, the categories are:

Priority 1 Infrastructure is fundamental to the strategy or must happen to enable physical growth. It includes key elements of transport, water and electricity infrastructure and green infrastructure requirements from the Habitats Regulation Assessment. Failure to deliver infrastructure that is fundamental to the strategy would have such an impact that it would require the strategy to be reviewed. This particularly applies to the NDR and the associated package of public transport enhancement. The sustainable transport requirements of the strategy and much of the development to the north of the built up area is dependent on these key elements of NATS.

Priority 2 Infrastructure is essential to significant elements of the strategy and required if growth is to be achieved in a timely and sustainable manner. Failure to address these infrastructure requirements is likely to result in the refusal of planning permission for individual growth proposals, particularly in the medium term as pressures build and any existing capacity is used up.

Priority 3 Infrastructure is required to deliver the overall vision for sustainable growth but is unlikely to prevent development in the short to medium term. The overall quality of life in the area is likely to be poorer without this infrastructure. Failure to address these infrastructure requirements is likely to result in the refusal of planning permission for individual growth proposal.

Table 1 shows a housing trajectory extract with Priority one infrastructure constraints. The thresholds indicated mark the point at which we currently have some certainty about the level of growth that can be supported. Depending on site characteristics, the nature of proposed development and other infrastructure constraints, these points may not be absolute barriers to further growth. Moreover some points mark the beginning of phased implementation over a number of years.

Table 2 – Infrastructure Framework shows infrastructure requirements to support growth across the JCS period.

Table 1: Housing Trajectory Extract with Priority 1 Infrastructure

	Short Term								Medium Term								Long Term											
	2011/ 12		2012/ 13	2013/ 14	2014/ 15		2015/ 16		2016/ 17			2017/ 18	2018/ 19		2019/ 20		2020/ 21		2021/ 22	2022/ 23	2023/ 24			2024/ 25	2025/ 26	Total Units	Ave Build rate	
Infrastructure ref		T2a				T5		T14 T17		T1	G16 G17			T3		SP1 T7		U3					U5 U6	SP13				
Rackheath	180		230	230	230		230		230			230	230		230		230		230	230	230				230	230	3400	227
Remainder of NE Growth Triangle					125		225		350			350	350		350		350		350	350	350				350	350	3850	321
Cumulative total	180		410	640	995		1450		2030			2610	3190		3770		4350		4930	5510	6090				6670	7250	7250	
Norwich City					250		250		250			250	250		250		250		250	250	250				250	250	3000	250
Cumulative total					250		500		750			1000	1250		1500		1750		2000	2250	2250				2500	2750	3000	
Long Stratton												50	140		230		230		230	230	230				230	230	1800	250
Cumulative total												50	190		420		650		880	1110	1340				1570	1800	1800	
Wymondham					185		185		185			185	185		185		185		185	185	185				185	165	2200	183
Hethersett					50		90		175			175	175		175		100		60								1000	125
Cringleford					0		50		100			125	125		125		125		125	125	125				125	50	1200	109
Cumulative total					235		560		1020			1505	1990		2475		2885		3255	3565	3875				4185	4400	4400	
Easton/Cosstessey					50		90		175			175	175		175		100		60								1000	125
Cumulative total					50		140		315			490	665		840		940		1000								1000	
Additional Smaller Sites Around Broadland NPA*					170		170		170			170	170		170		170		170	170	170				170	130	2000	
Sites Around South Norfolk NPA					150		150		150			150	150		150		150		150	150	150				150	150	1800	
Existing NPA Commitment	1572		1813	1437	943		821		652			449	172														7859	
Cumulative Existing NPA Commitments	1572		3385	4822	5765		6586		7238			7687	7859		7859		7859		7859	7859	7859				7859	7859	15718	
Projected Housing Total	1752		2043	1667	2153		2261		2437			2309	2122		2040		1890		1810	1690	1690				1690	1555	29109	
Cumulative NPA Commitments and Planned	1752		3795	5462	7615		9876		12313			14622	16744		18784		20674		22484	24174	25864				27554	29109		

* Until the NDR is in place the full number of dwellings proposed on smaller sites in Broadland may not be able to be provided. This will depend on individual site circumstances.

Red – public transport/transport related constraints
Blue – water related constraints
Pink – electricity related constraints
Green – selected green infrastructure projects

Table 2 – Infrastructure Framework

Infrastructure Framework: Priority 1 projects 2008 - 2016							
The base date for the Strategy is 2008. This table includes projects from 2008 - 2011 (the adoption of the Strategy) and 2011 - 2016 (the first 5 years of delivery post adoption)							

Waste Water							
The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment) and Utilities.							
Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
SP1	Sewerage upgrade - solutions subject to ongoing discussions with Anglian Water	Rackheath	Developer	tba	Developer/ AW provision	2016	Water Cycle Study Stage 2: B
SP3	Whitlingham Upgrade (Option 1)	Whole GNDP area	Anglian Water	42.9	AMP	2016	Water Cycle Study Stage 2: B
SP4	Whitlingham Upgrade (Option 2)	Norwich	Anglian Water	5	AMP	2016	Water Cycle Study Stage 2: B
SP5	Wymondham upgrade (Option 2)	Wymondham	Anglian Water	13.8	AMP	2016	Water Cycle Study Stage 2: B
SP6	Rackheath (Option 2)	Rackheath	Anglian Water	48	AMP	2016	Water Cycle Study Stage 2: B

Potable Water							
Water supply is adequate for growth in the short-term. Supply will require enhancement in the longer term, Anglian Water are committed to finding a solution by 2012. Solutions will be funded through the AMP process.							

Green Infrastructure

The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment) and Utilities.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
GI 15	Enhance public access to Yare Valley and Bawburgh Lakes	Overall scale of growth	Local Authorities/ Developer	tba	Local authority/ Developer contributions	2016	Green Infrastructure Delivery Plan
GI 16	Retention and re-creation of Mousehold Heath to the surrounding countryside	Overall scale of growth in particular Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Local Authorities/ Developer	tba	Local authority/ Developer contributions	2016	Green Infrastructure Delivery Plan
GI 17	Broads Buffer Zone	Overall scale of growth in particular Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Local Authorities/ Developer	tba	Local authority/ Developer contributions	2016	Green Infrastructure Delivery Plan

Electricity

The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment) and Utilities.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
U1	New primary sub-station on existing site (Hurricane Way)	Expansion of the employment area - airport business park	EDF energy	5.5	70% AMP • 30% Developer contributions	2016	Infrastructure Needs and Funding Study 2009

Transportation

The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment) and Utilities.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
T1	Norwich Northern Distributor Road	Overall scale of growth in particular Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle • Broadland: Smaller sites in the NPA (2000 dwellings) • Norwich Area Transportation Strategy including delivery of BRT • Broadland Business Park • Airport employment allocation	Norfolk County Council	106.2	DfT £67.5m • Growth Point • Developer Contributions • Norfolk County Council	2016	NATS
T2a	Postwick Junction improvements	Overall Scale of Growth. Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle • Broadland: Smaller sites in the NPA (2000 dwellings) • Norwich Area Transportation Strategy including delivery of BRT • Broadland Business Park • Airport employment allocation	Norfolk County Council	19	DfT • Growth Point 3.5 • Developer contributions	2016	NATS

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
T2b	Postwick Park and Rice Junction improvements	Overall Scale of Growth. Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle • Broadland: Smaller sites in the NPA (2000 dwellings) • Norwich Area Transportation Strategy including delivery of BRT • Broadland Business Park • Airport employment allocation	Norfolk County Council	6	Developer contributions	2016	NATS
T4 & T17	Thickthorn junction improvement including bus priority and park and ride improvements	Wymondham, Hethersett and Cringleford Growth Locations	Norfolk County Council/ Highways Agency	30	Developer contributions	2016 (scheme expected to be phased)	NATS
T5	Longwater junction improvements	West Growth Location	Norfolk County Council/ Highways Agency	30	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS
T6	Norwich Research Park transport infrastructure phase 1	Norwich Research Park	Norfolk County Council/ Highways Agency	5	Growth Point • Developer contributions	2016	NATS
T7	Grapes Hill bus improvements	Overall Growth	Norfolk County Council	0.18	Growth Point/ EEDA	Delivered	NATS
T7	Bus improvements Newmarket Road	Wymondham, Hethersett and Cringleford • Norwich Area Transportation Strategy including delivery of BRT	Norfolk County Council	0.4	Growth Point	Delivered	NATS
T7	City Centre bus improvements phase 1	Overall Growth	Norfolk County Council/ Norwich City Council	1	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
T8	Bus Rapid Transit via Fakenham Road - A1067 - Phase 1	Broadland Fringe Growth (subject to location of growth)	Norfolk County Council/ Norwich City Council	2.5	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS
T9	Bus Rapid Transit via Dereham Road - Phase 1	West Growth Location	Norfolk County Council/ Norwich City Council	1.25	Growth Point	2010 - 2011	NATS
T10	Bus Rapid Transit via Yarmouth Road - Phase 1	Broadland Business Park Expansion	Norfolk County Council/ Norwich City Council	2.5	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS
T11	Bus Rapid Transit via Salhouse Road and Gurney Road - Phase 1	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	1.8	1.8 Eco- community PoD • Developer contributions	2016	NATS
T12	Bus Rapid Transit via Norwich airport A140 to City Centre - Phase 1	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	2.5	Norfolk County Council • DfT • Growth Point • Developer contributions	2011-2016	NATS
T13	Bus priority route via Hethersett Lane/ Hospital/ Norwich Research Park/ University of East Anglia/ City Centre	Wymondham, Hethersett and Cringelford Growth Location & NRP	Norfolk County Council/ Norwich City Council	2.7	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
T14	Bus priority route via B1172 phase 1	Wymondham, Hethersett Growth Location	Norfolk County Council/ Norwich City Council	1.7	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS
T15	Development Link Broadland Business Park to Salhouse Road	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Developer Lead	2.5	Developer contributions	2016	NATS
T16	Bus priority - approach to Harford Junction	Long Stratton Growth Location	Norfolk County Council/ Highways Agency	2	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS
T18	Pedestrian / Cycle links to Longwater	West Growth Locations	Norfolk County Council	1.5	Norfolk County Council • DfT • Growth Point • Developer contributions	2016	NATS
N/A	Lady Julian Bridge	NATS • City Centre	Norwich City Council	2.58	Growth Point • S106 • EEDA	Delivered	NATS
N/A	Barrack Street ring-road improvement works	Overall Growth	Norfolk County Council/ Norwich City Council	1.3	Growth Point	Delivered	NATS

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
N/A	St Augustine's Gyratory	Norwich Area Transportation Strategy including delivery of BRT • City Centre bus enhancements	Norfolk County Council/ Norwich City Council	3.49	Growth point 2.42 • LTP 1.04 • S106 .03	2010	NATS
	Totals			341.30			

Infrastructure Framework: Priority 1 projects 2016 -2021

The base date for the Strategy is 2008. This table includes projects from 2008 - 2011 (the adoption of the Strategy) and 2011 - 2016 (the first 5 years of delivery post adoption)

Waste Water

The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment) and Utilities

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
SP1	Sewerage upgrade - solutions subject to ongoing discussions with Anglian Water	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Developer	TBA	Developer/ AW provision	2021	Water Cycle Study Stage 2b
SP2	Sewerage upgrade - solutions subject to ongoing discussions with Anglian Water	Hethersett, Cringleford, Easton/ Costessey	Developer	TBA	Developer/ AW provision	2021	Water Cycle Study Stage 2b
SP7	Whitlingham Upgrade (Option 1)	Whole GNDP area	Anglian Water	14.4	AMP	2021	Water Cycle Study Stage 2b
SP8	Whitlingham Upgrade (Option 2)	Norwich	Anglian Water	0.8	AMP	2021	Water Cycle Study Stage 2b
SP9	Wymondham upgrade (Option 2)	West growth locations	Anglian Water	22.4	AMP	2021	Water Cycle Study Stage 2b

Potable Water

Water supply is adequate for growth in the short-term. Supply will require enhancement in the longer term, Anglian Water are committed to finding a solution by 2012. Solutions will be funded through the AMP process.

Electricity

The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment) and Utilities.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
U2	New primary substation on new site (Norwich Airport north)	Expansion of the employment area - airport business park • Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	EDF energy	6.3	Developer contributions	2021	Infrastructure Needs and Funding Study
U3	New grid sub-station on existing sites (Norwich East)	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	EDF energy	17	100% AMP	2021	Infrastructure Needs and Funding Study

Green Infrastructure

The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment) and Utilities. All potable water improvements are delivered through the AMP process and are not included in this table.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
GI 15	Enhance public access to Yare Valley and Bawburgh Lakes	Overall scale of growth in particular Wymondham, Hethersett and Cringleford Growth Locations	Local authorities/ Developers	tba	Local authorities/ Developer contribution	2021	Green Infrastructure Delivery Plan
GI 16	Retention and re-creation of Mousehold Heath to the surrounding countryside	Overall scale of growth in particular Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Local authorities/ Developers	tba	Local authorities/ Developer contribution	2021	Green Infrastructure Delivery Plan
GI 17	Broads Buffer Zone	Overall scale of growth in particular Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Local authorities/ Developers	tba	Local authorities/ Developer contribution	2021	Green Infrastructure Delivery Plan

Transportation

The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment and Utilities). All potable water improvements are delivered through the AMP process and are not included in this table.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
T3	Long Stratton bypass A140 including improvement at Hempnall cross-roads	Long Stratton Growth Locations	Developer / Norfolk County Council	20	Developer contributions	2021	Developer
T6	Norwich Research Park transport infrastructure phase 2	Norwich Research Park	Norfolk County Council/ Highways Agency	8	Growth Point • Developer contributions	2021	NATS
T7	Bus priority - approach to Harford Junction	Overall Growth	Norfolk County Council	2	Developer contributions	2021	NATS
T7	City Centre bus improvements phase 1	Overall Growth	Norfolk County Council/ Norwich City Council	2.6	Growth Point • LTP • Developer contributions	2021	NATS
T7	City Centre bus improvements phase 2	Overall Growth	Norfolk County Council/ Norwich City Council	6	Growth Point • LTP • Developer contributions	2021	NATS
T8	Bus Rapid Transit via Fakenham Road - A1067 - Phase 2	Broadland Fringe Growth	Norfolk County Council/ Norwich City Council	5	Norfolk County Council • DfT • Growth Point • Developer contributions	2021	NATS
T9	Bus improvements Dereham Road phase 2	West Growth Locations	Norfolk County Council/ Norwich City Council	2.6	Growth Point • Developer contributions	2021	NATS
T10	Bus Rapid Transit via Yarmouth Road - Phase 2	Broadland Business Park Expansion	Norfolk County Council/ Norwich City Council	5	Norfolk County Council • DfT • Growth Point • Developer contributions	2021	NATS

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
T11	Bus improvements via Salhouse Road and Gurney Road phase 2	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	2.6	Developer contributions • Rackheath PoD	2021	NATS
T12	Bus Rapid Transit via Norwich airport A140 to City Centre - Phase 2	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	5	Norfolk County Council • DfT • Growth Point • Developer contributions	2021	NATS
T15	Development Link Broadland Business Park to Salhouse Road	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	2.5	Developer contributions	2021	NATS

Totals	122.20
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Infrastructure Framework: Priority 1 projects 2021 -2026

The base date for the Strategy is 2008. This table includes projects from 2008 - 2011 (the adoption of the Strategy) and 2011 - 2016 (the first 5 years of delivery post adoption)

Waste Water

The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment) and Utilities.

Ref	Scheme	Dependencies	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
SP1	Sewerage upgrade - solutions subject to ongoing discussions with Anglian Water	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Developer	tba	Developer/ AW provision	2026	Water Cycle Study Stage 2 B
SP2	Sewerage upgrade - solutions subject to ongoing discussions with Anglian Water	Hethersett, Cringleford, Easton/ Costessey	Developer	tba	Developer/ AW provision	2026	Water Cycle Study Stage 2 B
SP10	Whitlingham Upgrade (Option 1)	Whole GNDP area	Anglian Water	4.3	AMP	2026	Water Cycle Study Stage 2 B
SP11	Whitlingham Upgrade (Option 2)	Norwich	Anglian Water	0.4	AMP	2026	Water Cycle Study Stage 2 B
SP12	Wymondham upgrade (Option 2)	West growth locations	Anglian Water	0.5	AMP	2026	Water Cycle Study Stage 2 B
SP13	Sewerage upgrade - solutions subject to ongoing discussions with Anglian Water	Long Stratton	Anglian Water	Tba	AMP	2026	Water Cycle Study Stage 2 B

Potable Water

Water supply is adequate for growth in the short-term. Supply will require enhancement in the longer term, Anglian Water are committed to finding a solution by 2012. Solutions will be funded through the AMP process.

Electricity

The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment) and Utilities.

Ref	Scheme	Dependencies	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
U4	New primary substation on new site (Sprowston / Rackheath)	Old Catton, Sprowston, Rackheath, and Thorpe St Andrews growth triangle	EDF energy	4.3	Developer contribution	2026	Infrastructure Needs and Funding Study 2009
U5	Replacement of transformers and switchgear in existing site (Hapton)	Long Stratton	EDF energy	2.53	83% AMP • 17% Developer contributions	2026	Infrastructure Needs and Funding Study 2009
U6	Replacement of transformers and switchgear in existing site (Wymondham)	SW Growth location	EDF energy	2.53	67% AMP • 33% Developer contributions	2026	Infrastructure Needs and Funding Study 2009

Green Infrastructure

The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment) and Utilities.

Ref	Scheme	Dependencies	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
GI 16	Retention and re-creation of Mousehold Heath to the surrounding countryside	Overall scale of growth in particular Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle		tba		2026	Green Infrastructure Delivery Plan

Transportation

The table below lists the Priority 1 infrastructure requirements to deliver the Joint Core Strategy. The categories of infrastructure that are viewed as Priority 1 are Transport, Green Infrastructure (relating to the Habitats Regulations Assessment) and Utilities.

Ref	Scheme	Dependencies	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
T7	City Centre bus improvements phase 3	Overall Growth	Norfolk County Council/ Norwich City Council	6	Norfolk County Council • DfT • Growth Point • Developer contributions	2021 - 2026	NATS
T8	Bus Rapid Transit via Fakenham Road - A1067 - Phase 3	Broadland Fringe Growth	Norfolk County Council/ Norwich City Council	2.5	Norfolk County Council • DfT • Growth Point • Developer contributions	2021-2026	NATS
T9	Bus improvements Dereham Road phase 3	West Growth Location	Norfolk County Council/ Norwich City Council	2.6	Growth Point • LTP • Developer contributions	2021 - 2026	NATS
T10	Bus Rapid Transit via Yarmouth Road - Phase 3	Broadland Business Park Expansion	Norfolk County Council/ Norwich City Council	2.5	Norfolk County Council • DfT • Growth Point • Developer contributions	2021-2026	NATS
T11	Bus improvements via Salhouse Road and Gurney Road phase 3	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	0.6	Rackheath PoD • Developer contributions	2021 - 2026	NATS
T12	Bus Rapid Transit via Norwich airport A140 to City Centre - Phase 3	Old Catton, Sprowston, Rackheath, and Thorpe St Andrew Growth triangle	Norfolk County Council/ Norwich City Council	2.5	Norfolk County Council • DfT • Growth Point • Developer contributions	2021-2026	NATS
Totals				31.26			

Infrastructure Framework: Priority 2 projects 2008-2016

Education

The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates	Source
ED3	60 place pre-school	Norwich City	Norfolk County Council	0.54	Developers	2011	Infrastructure Needs and Funding Study
ED4	60 place pre-school	Norwich City	Norfolk County Council	0.54	Developers	2016	Infrastructure Needs and Funding Study

Healthcare

The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. The Health Authority will take a flexible approach to the provision of hospital beds. Locations will be determined by the Health Authority at a later date. It is presumed funding will come through the AMP.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates	Source
HC1	GPs Surgery (3 GPs)	Norwich City	Health Authority	1.03	Health Authority	2011	Infrastructure Needs and Funding Study
HC2	Dentists surgery (4 Dentists)	Norwich City	Health Authority	1.25	Health Authority	2016	Infrastructure Needs and Funding Study

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates	Source
HC6	Expansion of existing facilities (2 GPs and 2 Dentists)	Broadland Elsewhere	Health Authority	0.9	Health Authority	2016	Infrastructure Needs and Funding Study
HC12	Expansion of existing facilities (7 GPs and 7 Dentists)	South Norfolk Elsewhere	Health Authority	3.5	Health Authority	2016	Infrastructure Needs and Funding Study
HC13	Hospital bed requirements	Overall scale of growth	Health Authority	10	Health Authority	2016	Infrastructure Needs and Funding Study

Green infrastructure

The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. Green infrastructure projects are being assessed following completion of the Green Infrastructure Delivery Plan. Open space will be planned in relation to each growth location and planned in line with development.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates	Source
N/A	Wensum River Parkway	Overall scale of growth	HEART/ Norwich City Council	0.07	Growth Point	Delivered	Green Infrastructure Steering Group
N/A	Catton Park visitor centre and park improvements	Overall scale of growth	Catton Park Trust/ Norfolk County Council	0.37	Growth Point	Delivered	Green Infrastructure Steering Group
N/A	Whitlingham Country Park Access Improvements	Overall scale of growth	Norfolk County Council	0.12	Growth Point	Delivered	Green Infrastructure Steering Group
N/A	Wooded ridge	Overall scale of growth	Norwich City Council	0.04	Growth Point	Delivered	Green Infrastructure Steering Group

GI 1-14	Green infrastructure projects and open space	Overall scale of growth	Various	tba	Local authorities • Developers contributions • Other funding sources to be identified	2016	Green Infrastructure Steering Group
Totals				18.36			

Infrastructure Framework: Priority 2 projects 2016-2021

Education

The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
ED1	60 place pre-school	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	0.54	Developer contribution	2021	Infrastructure Needs and Funding Study
ED1	60 place pre-school (co-location with community space)	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	0.54	Developer contribution	2021	Infrastructure Needs and Funding Study
ED1	2FE primary with integrated 60 place nursery	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	5.14	Developer contribution	2021	Infrastructure Needs and Funding Study
ED1	2FE primary with integrated 60 place nursery	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	5.14	Developer contribution	2021	Infrastructure Needs and Funding Study
ED5	2FE primary with integrated 60 place nursery	Norwich City	Norfolk County Council	5.14	Developer contribution	2021	Infrastructure Needs and Funding Study
ED5	2FE primary with integrated 60 place nursery	Norwich City	Norfolk County Council	5.14	Developer contribution	2021	Infrastructure Needs and Funding Study
ED7	30 place pre-school	Wymondham	Norfolk County Council	0.285	Developer contribution	2021	Infrastructure Needs and Funding Study
ED7	2FE primary with integrated 60 place nursery	Wymondham	Norfolk County Council	5.14	Developer contribution	2021	Infrastructure Needs and Funding Study
ED7	60 place pre-school	Hethersett	Norfolk County Council	0.54	Developer contribution	2021	Infrastructure Needs and Funding Study
ED7	60 place pre-school	Easton	Norfolk County Council	0.54	Developer contribution	2021	Infrastructure Needs and Funding Study

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
ED9	1400 secondary school with 280 sixth form places co-located with 4 x indoor sports courts phase 1	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	26	Developer contribution	2021	Infrastructure Needs and Funding Study
ED10	Expanded secondary school provision	Wymondham, Hetherset, Cringleford, Costessey / Easton	Norfolk County Council	10	Developer contribution	2021	Infrastructure Needs and Funding Study and ongoing assessment of options

Healthcare

The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. The Health Authority will take a flexible approach to the provision of hospital beds. Locations will be determined by the Health Authority at a later date. It is presumed funding will come through the AMP.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
HC3	Expansion of existing facilities (6 GPs and 5 Dentists)	Norwich City	Health Authority	4.5	Health Authority	2021	Infrastructure Needs and Funding Study
HC4	Primary Care Centre (5 GPs and 4 Dentists)	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Health Authority	3.35	Health Authority	2021	Infrastructure Needs and Funding Study
HC7	Expansion of existing facilities (3 GPs and 2 Dentists)	Wymondham	Health Authority	1.8	Health Authority	2021	Infrastructure Needs and Funding Study
HC9	Expansion of existing facilities (1 GP and 1 Dentist)	Hetherset	Health Authority	0.55	Health Authority	2021	Infrastructure Needs and Funding Study
HC11	Expansion of existing facilities (1 GP and 1 Dentist)	Easton / Costessey	Health Authority	0.55	Health Authority	2021	Infrastructure Needs and Funding Study
HC13	Hospital bed requirements	Overall scale of growth	Health Authority	6	Health Authority	2021	Infrastructure Needs and Funding Study

Green infrastructure

The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. Green infrastructure projects are being assessed following completion of the Green Infrastructure Delivery Plan. Open space will be planned in relation to each growth location and planned in line with development.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
GI 1-14	Green infrastructure projects and open space	Overall scale of growth	Various	tba	Local authorities • Developers contributions • Other funding sources to be identified	2021	Green Infrastructure Steering Group

Totals				80.90			
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Infrastructure Framework: Priority 2 projects 2021-2026

Education

The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates	Source
ED2	60 place pre-school	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	0.54	Developer contribution	2026	Infrastructure Needs and Funding Study
ED2	2FE primary with integrated 60 place nursery	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	5.14	Developer contribution	2026	Infrastructure Needs and Funding Study
ED2	2FE primary with integrated 60 place nursery	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	5.14	Developer contribution	2026	Infrastructure Needs and Funding Study
ED6	60 place pre-school co-located with 600sqm combined community centre and library	Norwich City	Norfolk County Council	0.54	Developer contribution	2026	Infrastructure Needs and Funding Study
ED8	60 place pre-school	Wymondham	Norfolk County Council	0.54	Developer contribution	2026	Infrastructure Needs and Funding Study
ED8	2FE place primary	Cringleford	Norfolk County Council	2.3	Developer contribution	2026	Infrastructure Needs and Funding Study
ED8	1 FE place primary	Hethersett	Norfolk County Council	2.3	Developer contribution	2026	Infrastructure Needs and Funding Study
ED8	60 place pre-school	Long Stratton	Norfolk County Council	0.54	Developer contribution	2026	Infrastructure Needs and Funding Study
ED9	1400 secondary school with 280 sixth form places co-located with 4 x indoor sports courts phase 2	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Norfolk County Council	13	Developer contribution	2026	Infrastructure Needs and Funding Study

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates	Source
ED8	2FE primary with integrated 60 place pre-school co- located with combined community centre and library	Long Stratton	Norfolk County Council	5.14	Developer contribution	2026	Infrastructure Needs and Funding Study
ED8	60 place pre-school	Cringleford	Norfolk County Council	0.54	Developer contribution	2026	Infrastructure Needs and Funding Study
ED8	1FE primary	Easton	Norfolk County Council	2.5	Developer contribution	2026	Infrastructure Needs and Funding Study
ED10	Expanded secondary school provision	Wymondham, Hethersett, Cringleford, Costessey / Easton, Long Stratton, rest of South Norfolk NPA	Norfolk County Council	10	Developer contribution	2026	Infrastructure Needs and Funding Study and ongoing assessment of options

Healthcare

The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 2 are Education, Healthcare and Green Infrastructure. The Health Authority will take a flexible approach to the provision of hospital beds. Locations will be determined by the Health Authority at a later date. It is presumed funding will come through the AMP.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
HC5	Primary Care Centre (5 GPs and 4 Dentists)	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Health Authority	3.35	Health Authority	2026	Infrastructure Needs and Funding Study
HC8	Combined surgery (2 GPs and 2 Dentists)	Long Stratton	Health Authority	1.5	Health Authority	2026	Infrastructure Needs and Funding Study
HC10	Expansion of existing facilities (1 GP and 1 Dentists)	Cringleford	Health Authority	0.55	Health Authority	2021 - 2026	Infrastructure Needs and Funding Study
HC12	Expansion of existing facilities (1 GP)	South Norfolk Elsewhere	Health Authority	0.6	Health Authority	2026	Infrastructure Needs and Funding Study
HC13	Hospital bed requirements	Overall scale of growth	Health Authority	12	Health Authority	2026	Infrastructure Needs and Funding Study

Green infrastructure

The table below lists the Priority 2 infrastructure requirements to deliver the Joint Core Strategy. The 3 categories of infrastructure that are viewed as Priority 1 are Education, Healthcare and Green Infrastructure. Green infrastructure projects are being assessed following completion of the Green Infrastructure Delivery Plan. Open space will be planned in relation to each growth location and planned in line with development.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
GI 1-14	Green infrastructure projects and open space	Overall scale of growth	Various	tba	Local authorities • Developers contributions • Other funding sources to be identified	2026	Green Infrastructure Steering Group

Totals			66.22			
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Infrastructure Framework: Priority 3 projects 2008-2016

Community facilities

The table below lists the Priority 3 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 3 are Community facilities and Community services.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
CF1	Community facilities	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Broadland District Council	0.5	Private companies • Developers • Local authorities	2011-16	Infrastructure Needs and Funding Study
CF2	Community facilities	Norwich	Norwich City Council	1	Private companies • Developers • Local authorities	2011-16	Infrastructure Needs and Funding Study
CF3-5	Community facilities	South Norfolk	South Norfolk Council	4	Private companies • Developers • Local authorities	2011-16	Infrastructure Needs and Funding Study

Totals			5.50			
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Infrastructure Framework: Priority 3 projects 2016-2021

Community facilities

The table below lists the Priority 3 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 3 are Community facilities and Community services.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
CF1	Community facilities	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Broadland District Council	2	Private companies • Developers • Local authorities	2016 - 2021	Infrastructure Needs and Funding Study
CF2	Community facilities	Norwich	Norwich City Council	3.05	Private companies • Developers • Local authorities	2016 - 2021	Infrastructure Needs and Funding Study
CF3-5	Community facilities	South Norfolk	South Norfolk Council	3.1	Private companies • Developers • Local authorities	2016 - 2021	Infrastructure Needs and Funding Study

Community services

The table below lists the Priority 3 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 3 are Community facilities and Community services.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
CI 12	Fire Service	Overall scale of growth	Norfolk County Council	tba	Norfolk County Council	2016-2021	Infrastructure Needs and Funding Study
CI13	Ambulance Service	Overall scale of growth	Norfolk Ambulance Service	tba	Norfolk Ambulance Service	2016-2021	Infrastructure Needs and Funding Study

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
CI 1-11	Police Safer Neighbourhood teams - Broadland (18 officers) • Norwich (22 officers) • South Norfolk (32 officers)	Overall scale of growth	Norfolk Constabulary	5.25	Norfolk Constabulary	2016-2021	Infrastructure Needs and Funding Study

Totals			13.40			
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Infrastructure Framework: Priority 3 projects 2021-2026

Community facilities

The table below lists the Priority 3 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 3 are Community facilities and Community services.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
CF 1	Community facilities	Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle	Broadland District Council	2	Private companies • Developers • Local authorities	2021-2026	Infrastructure Needs and Funding Study
CF 2	Community facilities	Norwich	Norwich City Council	3.05	Private companies • Developers • Local authorities	2021-2026	Infrastructure Needs and Funding Study
CF 3-5	Community facilities	South Norfolk	South Norfolk Council	3.1	Private companies • Developers • Local authorities	2021-2026	Infrastructure Needs and Funding Study

Community services

The table below lists the Priority 3 infrastructure requirements to deliver the Joint Core Strategy. The 2 categories of infrastructure that are viewed as Priority 3 are Community facilities and Community services.

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
CI 12	Fire Service	Overall scale of growth	Norfolk County Council	TBA	Norfolk County Council	2021-2026	Infrastructure Needs and Funding Study
CI 13	Ambulance Service	Overall scale of growth	Norfolk Ambulance Service	TBA	Norfolk Ambulance Service	2021-2026	Infrastructure Needs and Funding Study

Ref	Scheme	Required for growth in:	Promoter/ Delivery body	Total Cost £m	Funding sources	Estimated delivery dates by	Source
CI 1-11	Police Safer Neighbourhood teams - Broadland (18 officers) • Norwich (44 officers) • South Norfolk (64 officers)	Overall scale of growth	Norfolk Constabulary	5.25	Norfolk Constabulary	2021 - 2026	Infrastructure Needs and Funding Study

Totals			13.4
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APPENDIX B

Changes that the Inspectors consider necessary to make the JCS sound

Inspector Change No.	Policy/Paragraph /Page	Change
IC1	Policy 10 Below para 7.11(p94)	Reword 2nd sentence of section headed 'Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle' as follows: “Complete delivery of the extension is dependent on implementation of the Northern Distributor Road. However, there is scope for partial delivery and the extent of this will be assessed through the Area Action Plan.” Add the following paragraphs below the new subheading “Contingency”: 7.12 [As set out in SC27] 7.13 “There is no phasing of growth in the JCS beyond that imposed by the provision of infrastructure and, at the time of adoption, there are not expected to be significant constraints to the provision of most critical elements. However, there remains some uncertainty around the delivery of the Northern Distributor Road (NDR). 7.14 Notwithstanding this, there is a significant housing commitment across the JCS area that is unaffected by infrastructure constraints. Delay to, or non delivery of, the NDR would not prevent the JCS provision of housing and employment development within the Norwich City and South Norfolk areas or the existing housing commitment in Broadland. Indeed, market pressures are likely to bring forward development in these locations. The existing commitment and the range and scale of growth proposals across the JCS area

		provide significant flexibility to bring forward growth in those locations unaffected by infrastructure constraints. 7.15 Without the NDR the housing and employment growth in the Broadland part of the NPA cannot all be delivered, and neither can significant parts of NATS including high-quality public transport in the northern part of the urban area. 7.16 In February 2011 the NDR/ Postwick Hub scheme was one of a 'Development Pool' of 45 national schemes which are to be scrutinised by the Department for Transport in terms of their business case, value for money and other criteria. A final decision on funding is to be made by the Secretary of State by the end of 2011. 7.17 Pending clarification of the NDR's delivery or otherwise, the existing commitment of 1400 dwellings in the Sprowston Fringe can take place without improvements to Postwick Junction. Subject to acceptable improvements to Postwick Junction (in the form of Postwick Hub or a suitable alternative) there is significant potential for further development in the growth triangle before confirmation of the delivery of the NDR. The table below summarises the current understanding of this potential. [include table from RF117] 7.18 Broadland District Council is committed to preparing an Area Action Plan (AAP) for the growth triangle. As part of the preparation of this AAP there will be an investigation of any potential that may exist for further growth to take place (in addition to that shown in table 1 above) without confirmation of the delivery of the NDR. This will include testing whether interim schemes and/or alternatives to the NDR could help to facilitate growth without compromising the spatial vision and objectives of the JCS. Therefore, the analysis would need to cover capacity of all infrastructure, not just road capacity, the implications of particular sites, and the nature of the proposed development. It will be essential that the growth is delivered in accordance with the overall strategy
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		taking account of its wider impact across the Norwich area, including a full range of infrastructure provision, services and high quality public transport and walking/cycling provision. 7.19 Development beyond the pre-NDR threshold established through the AAP process will not be possible without a commitment to the NDR. If becomes clear that there is no possibility of the timely construction of the NDR, a review of the JCS proposals for the growth triangle and the implications for the strategy as a whole would be triggered.”
IC2	Policy 3 (p38)	Change the first paragraph of the policy and its accompanying bullet points to read as follows: ‘Development in the area will, where possible, aim to minimise reliance on non-renewable high-carbon energy sources and maximise the use of decentralised and renewable or low-carbon energy sources and sustainable construction technologies. To help achieve this: All development proposals of a minimum of 10 dwellings or 1,000sqm of non residential floorspace will be required (a) to include sources of ‘decentralised and renewable or low carbon energy’ (as defined in the glossary) providing at least 10% of the scheme’s expected energy requirements and (b) to demonstrate through the Design and Access Statement for the scheme whether or not there is viable and practicable scope for exceeding that minimum percentage provision. In addition to the above requirement, detailed proposals for major developments (minimum of 500 dwellings or 50,000sqm of non residential floorspace) will be required to demonstrate through the Design and Access Statement that the scheme has seized opportunities to make the most of any available local economies of scale to maximise provision of energy from sources of ‘decentralised and renewable or low carbon energy sources’, All development proposals of a minimum

		of 10 or 1,000sqm of non residential floorspace will be required to demonstrate, through the Design and Access Statement, that all viable and practicable steps have been taken to maximise opportunities for sustainable construction.'
IC3	Paragraphs 5.13-5.18 (p39-40)	Change these paragraphs by replacing them as follows: “5.13 The East of England Plan sets a target that 17% of the region’s energy should come from onshore renewable sources by 2017, while regional water efficiency targets require a 25% reduction in water use in new development compared with 2006 minimum standards and an 8% reduction in water use for existing housing. 5.14 Development in the area will be consistent with any current national standards relating to renewable or low carbon energy generation and the use of sustainable building technologies. In addition, schemes of a minimum of 10 dwellings or 1,000sqm of non residential floorspace will be required to demonstrate through the related Design and Access Statement that (a) provision is made for at least 10% of the development’s energy requirements to come from sources of decentralised and renewable or low carbon energy and (b) all viable and practicable steps have been taken to maximise opportunities for sustainable construction. In addition, the Design and Access Statement for any larger development, as defined in policy 3, will need to show that the scheme has made the most of any available local economies of scale to maximise the proportion of its energy derived from sources of decentralised and renewable or low carbon energy. Combined heat and power [CHP] and district heating/cooling networks may be the most cost effective ways of achieving these economies. Greater Norwich Development Partnership will promote local energy generation through the establishment of Energy Service Companies (ESCOs), possibly with community ownership.

		5.15 Other Development Plan Documents and Supplementary Planning Documents will give further advice on these matters. These will use the relevant government definition of zero-carbon when this is available and adopted.”
IC4	Appendix 8 (p134)	Change by inserting new row between rows 2 and 3 to read: “Decentralised and renewable or low carbon energy sources installed in developments [Local] /LA Environmental Services/ Year on year percentage increase /LPA AMRs” Change by deleting present fourth row Change first and third columns of the present fifth row to read: “All new housing schemes to reach Code for Sustainable Homes level 4 for water on adoption and housing schemes of a minimum of 500 dwellings to reach level 6 for water by 2015”
IC5	Appendix 9 Glossary (p148)	Change by inserting the following definition: “Decentralised and renewable or low-carbon energy sources: Sources of energy that are renewable or low-carbon (or a combination of these) and locally based (on-site or near-site, but not remote off-site), usually on a relatively small scale. Decentralised energy is a broad term used to denote a diverse range of technologies, including micro-renewables, which can locally serve an individual building, development or wider community and includes heating and cooling energy.”
IC6	Policy 4 (p41)	Change the section on Affordable Housing in policy 4 by replacing it as set out in FC1 (Appendix A) but replacing “40 %” with “33 %”.

IC7 [Relates to former advertised change IC6]	Paragraphs 5.28-29 (p44)	Change these paragraphs by deleting them and replacing them as follows: “5.28 Affordable housing is defined as ‘housing provided for rent, sale or shared equity at prices permanently below the current market rate, which people in housing need are able to afford’. 5.28A It is difficult to estimate the need for affordable homes over the long term to 2026. However, based on the findings of the most recent assessment of housing need across the three Districts (2006, updated in 2009), the requirement for affordable dwellings over the period 2008-2026 is estimated to be of the order of 11,860. This equates to just over 33% of the JCS total housing provision during that time. 5.28B The policy target is for 33% affordable housing on schemes of 16 dwellings or more, 30% on schemes of 10-15 dwellings and 20% in schemes of 5-9 dwellings. These tapered requirements for schemes below the national indicative threshold of 15 dwellings in PPS3 recognise that much development takes place on smaller sites and that without appropriate contributions from such schemes there would be a significant undersupply of affordable housing against the identified need. The Drivers Jonas Deloitte study 2010 and subsequent outputs of the model show a reasonable prospect that the above requirements are likely to be viable (without grant) in a significant proportion of cases in the various market scenarios which may prevail over the course of the plan period. 5.29 It is recognised that affordable housing provision through this policy is dependent upon the overall viability of development. In turn this depends upon a wide range of site specific circumstances. Where a developer suggests that site viability does not permit full provision at the level required by the policy this position will need to be

		demonstrated through the use of an open-book process employing an appropriate toolkit or model before any agreement is made to reduce the proportion of affordable homes and/or amend the mix of tenures. Where possible, contributions from any available public funds such as a grant from the Homes and Communities Agency (HCA) will be sought to bring marginal or unviable schemes to viability. In order to create mixed communities, affordable housing provided as part of a market development will be expected to be integrated within the site.” 5.29A From the needs assessment referred to above, the long-term required tenure mix is estimated to be about 60 % social rented/40 % intermediate tenures across the JCS area as a whole. This mix varies across the JCS area with the greatest need for social rented accommodation in the urban area of Norwich. Negotiations over the provision to be made by individual schemes will take account of these variations in tenure needs over place and time. 5.29B Policy on affordable housing will be regularly monitored, including (a) the outcomes of policy 4, (b) changing needs for affordable housing and the relevant tenure mix, and (c) the viability of provision. If necessary, the policy will be formally reviewed.
IC8 [Relates to former advertised change IC7]	Diagram at p35	Change by deleting the present diagram and replacing it with the two indicative diagrams referred to at SC2 and SC4 (Appendix A), respectively entitled ‘Biodiversity Areas’ and ‘Proposed Green Infrastructure Network for the Greater Norwich Area’.

Joint Core Strategy for Broadland, Norwich and South Norfolk

APPENDIX C

Schedule of minor changes December 2010

Table 1 – Changes submitted at Regulation 30 stage

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
MC 1	Inside front cover	Foreword, last para.	Replace “are immense” with “is immense”	Grammar	Internal	Reg 30
MC 2	Page 9	First para, 3 rd line	Delete “the”	Typo – repeated word	NE	Reg 30
MC 3	Page 15	Para 3.1	Replace “The area has two assets of international importance – its heritage and its growing knowledge economy.” With “The area has three assets of international importance – its heritage, natural environment and its growing knowledge economy.”	Clarification	Natural England 11471	Reg 30
MC 4	Page 17	Para 3.12, 1 st sentence	Replace “...Norwich, the Broadland Business Park...” with “...Norwich. The Broadland Business Park...”	Correct typo	Internal	Reg 30
MC 5	Page 17	Para 3.12, penultimate sentence	Replace “at in excess of 90%” with “at over 90%”	Simplify text	Internal	Reg 30
MC 6	Page 22	Spatial Vision, 1 st para.	Line 5: replace “36,740” with “36,820” Line 6: replace “over 33,000” with	Clarification and consistency	Internal	Reg 30

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
			"approximately 33,000"			
MC 7	Page 22	Spatial vision, 3 rd para.	Replace "...large mixed use urban extension in the..." with "...large mixed use urban extension within the..."	Clarification	Internal	Reg 30
MC 8	Page 24	Spatial Vision, The urban area of Norwich, 4 th bullet	Amended bullet to read: Norwich will treasure and promote its rich historic, cultural and architectural heritage by encouraging new buildings built to an exceptional design quality, maintaining and enhancing its parks, wildlife sites, woodland and heathland"	Clarification	Arising from an English Heritage proposed revision (11409) which was too limiting	Reg 30
MC 9	Page 25	Spatial Vision, Towns, villages and the rural area, 6 th bullet, 5 lines from bottom	Replace: "each town's form and function" with "each town's form, function, historic character and quality"	Clarification	English Heritage (11410)	Reg 30
MC 10	Page 28	Objective 9, supporting text, lines 17 and 18	After sentence ending "agricultural land and the countryside." Add "The scale of development we have to accommodate will require the development of some significant greenfield areas, which will affect the existing landscape." Amend the next sentence to begin "Where this is necessary, development must provide environmental gains..."	Clarification and consistency with strategy	Broadland Land Trust (11650)	Reg 30
MC 11	Page 28	Objective 9, supporting text, 8 lines from end	Replace "Biodiversity and locally distinctive landscapes" with "Biodiversity, geodiversity and locally distinctive landscapes"	Clarification	Norfolk Geo-diversity	Reg 30

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
					Partnership (11299)	
MC 12	Page 29	Key Diagram	Revised description in the key: replace “Long Stratton Bypass” with “Route of permitted Long Stratton Bypass”	Clarification	Partially addresses point raised by English Heritage (11425)	Reg 30
MC 13	Page 32	Policy 1, right hand column, para 1, line 6	Replace “protected species in the area and beyond due to storm water runoff” with “protected species in the area and beyond including by storm water runoff”	Clarification	Internal	Reg 30
MC 14	Page 32	Policy 1, right hand column, last para., line 5	Replace which contribute to “their surroundings, the encouragement of” with “their surroundings, the protection of their settings, the encouragement of”	Clarification	Arising from a representation from English Heritage (11411), and meeting it in part	Reg 30
MC 15	Page 34	Policy 1, references	Add: “Historic Characterisation and Sensitivity Assessment (Norfolk County Council 2009) Planning Policy Statement 5: Planning for the historic environment (note change from original submitted schedule)	Clarification	English Heritage (11414)	Reg 30
MC 16	Page	Strategic Green	Key: last sentence, correct spelling of	Typo	Page 35	Reg 30

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
	35	Infrastructure map	"Infrastructure"			
MC 17	Page 36	Policy 2, list of objectives at end	Add reference to spatial planning objective 9.	Clarification	Partially meets representation by English Heritage (11416)	Reg 30
MC 18	Page 38	Policy 2, references	Add: "Historic Characterisation and Sensitivity Assessment (Norfolk County Council 2009)	Clarification	Partially meets representation by English Heritage (11416)	Reg 30
MC 19	Page 38	Policy 3	In bullet point 1 and 2 replace "renewable" with "decentralised and renewable or low-carbon energy"	Clarification	Comply with PPS1 Supplement	Reg 30
MC 20	Page 40	References	Amend list of references for Policy 3 First reference to read "East of England Plan Policies ENG1, ENG2, WAT1, WAT2 and WAT 3 Third reference to read "Greater Norwich Integrated Water Cycle Study Stage 2b (2009) and Final (Feb 2010) with Stakeholder Position Statements Add to list of references for Policy 3 "Planning Policy Statement 1 [PPS1] Delivering Sustainable Development" "Planning Policy Statement: Planning and	Correction for consistency Updated information Updated information	Internal Internal Internal	Reg 30

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
			Climate Change Supplement to Planning Policy Statement 1"			
MC 21	Page 41	Policy 4, 1 st para	Line 2: replace "36,740" with "36,820" Line 3: replace "over 33,000" with "approximately 33,000"	Correction for consistency	Internal	Reg 30
MC 22	Page 41	Policy 4, Gypsies and Travellers, 1 st paragraph, 1 st sentence	Amended sentence to read: "Provision will be made for a minimum of 58 permanent residential pitches for Gypsies and Travellers between 2006 and 2011 to ensure full conformity with Regional Spatial Strategy Policy H3."	To ensure full conformity with regional spatial strategy	Friends Family and Travellers (11249)	Reg 30
MC 23	Page 41	Policy 4, Gypsies and Travellers, 2 nd paragraph	Amended paragraph to read: "Between 2012 and 2026, an additional minimum 78 permanent residential pitches will be provided to ensure full conformity with Regional Spatial Strategy Policy H3. These will be distributed on the following basis: Broadland 20, Norwich 20, and South Norfolk 38."	To ensure full conformity with regional spatial strategy	Friends Family and Travellers (11249)	Reg 30
MC 24	Page 42	Para 5.24, lines 21 to 29	Delete sentence: "To ensure needs are met, subsequent DPDs will make allocations outside the NPA to deliver at least 650 to 1,100 dwellings in Broadland and 1,000 to 1,600 dwellings in South Norfolk (the minimum is the requirement rounded up, the higher figure is the top end of the range identified for the locations combined and rounded up)."	Clarification. Unnecessary.	Internal	Reg 30
MC 25	Page 44	Para. 5.29, last sentence	Replace "In circumstances where viability is a concern" with "In exceptional circumstances where viability is a concern"	Clarification	Gladedale (11436)	Reg 30
MC 26	Page	Policy 4,	Add " Norwich City Council Affordable	Clarification	Internal	Reg 30

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
	45	References	Housing Viability Testing June 2009"			
MC 27	Page 45	Policy 4, References	Add "Greater Norwich Housing Market Assessment Update – November 2009" (completed Jan 2010) Add East of England Forecasting Model Spring 2010.	Updated information	Internal	Reg 30
MC 28	Page 47	Policy 5, 10 th bullet (3 rd bullet on page 47)	Replace "support for enterprise hubs at Norwich Research Park, EPIC" with "support for enterprise hubs at Norwich Research Park, the University of East Anglia, EPIC"	Clarification	University of East Anglia (11385)	Reg 30
MC 29	Page 49	Policy 6, 9 th bullet	Replace "provision of IT links and promotion of home working" with "provision of IT links, telecommunications and promotion of home working"	Clarification	Mobile Operators Association (11314)	Reg 30
MC 30	Page 50	Para. 5.46, 2 nd bullet	Replace "junction improvements on the A47" with "junction improvements, including public transport priority, on the A47"	Clarification	Highways agency	Reg 30
MC 31	Page 50	Para. 5.48, line 3	Replace "need to travel is managed. Ensuring that all residents have good access" with "need to travel is managed. Travel planning and smarter choices initiatives will be promoted to ensuring that all residents have good access"	Clarification	Highways agency (11490)	Reg 30
MC 32	Page 51	Para. 5.50, line 1	Replace "Fast broadband connections are an increasingly important requirement" with "Fast broadband connections and telecommunications are an increasingly important requirement"	Clarification	Mobile Operators Association (11314)	Reg 30
MC 33	Page 51	Policy 6, references	Add "JCS Transport Strategy Report (Jan 2010)" "Baseline Conditions Report – JCS	Updated information	Internal	Reg 30

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
			Submission (Jan 2010)"			
MC 34	Page 52	Policy 7, Crime	Replace "New police facilities will be provided to serve areas of major growth." with "New police facilities will be provided to serve areas of major growth and areas which are deficient."	Clarification	Norfolk constabulary (11521)	Reg 30
MC 35	Page 55	Policies for places, para 6.2, line 3	Replace "strategy for the Norwich Policy Area and distribute growth according to..." with "strategy for the Norwich Policy Area in addition to the designation of areas for large-scale growth, and distribute growth according to..." (See para 6.3)	Clarification	Internal	Reg 30
MC 36	Page 55	Policies for places, para 6.2	Add new sentence at end (after list 1-5): "The policies refer to settlements which in some cases may extend into adjacent parishes."	Clarification	Sunguard Homes (11173)	Reg 30
MC 37	Page 62	Policy 10, 6 th bullet, line 4	Replace "community and recreational facilities" with "community, police and recreational facilities"	Clarification	Norfolk Constabulary (11524)	Reg 30
MC 38	Page 63	Policy 10, Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle 6 th bullet, last line	Replace "impacts on the Broads SAC" with "impacts on the Broads SAC, Broadland SPA and Broadland Ramsar site"	Clarification	Natural England (11474)	Reg 30
MC 39	Page 66	Para 6.13, line 7	Replace "and are not at risk of fluvial flooding." with "and are not at significant risk of fluvial flooding."	Clarification	Anglian Water (11585)	Reg 30
MC 40	Page 67	Para 6.22, line 5	Replace "improvements at Whitlingham sewage treatment works" with "improvements at Whitlingham and other sewage treatment works"	Correction for consistency	Anglian Water (11583)	Reg 30
MC 41	Page	Policy 10,	Add:	Clarification	English	Reg 30

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
	68	References	Planning Policy Statement 5: Planning for the historic environment (note change from original submitted schedule)		Heritage (11426)	
MC 42	Page 70	Policy 11, 1 st bullet	Lines 3 and 4 : delete the words “contemporary medieval” Amend lines 3 and 4 to read: “and its distinctive character, as identified in Conservation Area appraisals, through innovative”	Clarification	English Heritage (11427)	Reg 30
MC 43	Page 72	Policy 11, references	1 st bullet: add reference to Planning Policy Statement 5: Planning for the historic environment (note change from original submitted schedule)	Clarification	English Heritage (11428)	Reg 30
MC 44	Page 74	Policy 12, 4 th bullet	Replace “for small-scale and medium-scale redevelopments to increase densities” with “for small-scale and medium-scale developments to increase densities”	Clarification	Goymour Properties Ltd (11536)	Reg 30
MC 45	Page 77	Para. 6.34, line 4	Replace “to ensure the availability of around employment land.” with “to ensure the availability of around 5 hectares of employment land.”	Correction of omission	Internal	Reg 30
MC 46	Page 82	Para 6.54	Add new sentence at end of the paragraph “New development will have to take particular account of surface water flood issues.”	Clarification	Environment agency (11691)	Reg 30
MC 47	Page 83	Photograph	Replace photograph of Hoveton with one within Wroxham	Correction	Internal	Reg 30
MC 48	Page 85	Para. 6.58, second sentence	Replace “It is envisaged that for villages outside the NPA allocations will be within the range of 10-20 dwellings in each Service Village.” With “It is envisaged that allocations will be within the range of 10-20 dwellings in	Clarity and consistency	Internal and Charles Birch (11699)	Reg 30

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
			each Service Village.”			
MC 49	Page 88	Policy 18, second para, line 5	Replace “Broads Ramsar” with “Broadland Ramsar”	Correct name	Natural England (11474)	Reg 30
MC 50	Page 89	Para 6.69	Add new sentence at end of the paragraph: “Co-ordinated development management policies for the three Districts will include consideration of a lower threshold for impact assessments than the national threshold set out in Planning Policy Statement 4.”	To take account of Planning policy Statement 4	Internal	Reg 30
MC 51	Page 92	Policy 20 Implementation 2nd column 2nd para	Replace “The precise timing will be carried out,” with “the precise timing and phasing of infrastructure will be managed ”	Clarification	Internal	Reg 30
MC 52	Page 99	Appendix 2 Supporting Documents	Under Research and studies : Housing add “Greater Norwich Housing Market Assessment Update – November 2009 (completed Jan 2010)” Add “ Norwich City Council Affordable Housing Viability Testing June 2009” Under Research and studies : Environment Amend 1st bullet point heading from “Appropriate Assessment of the Joint Core Strategy for Broadland, Norwich and South Norfolk” to read “Habitats Regulation Assessment (Appropriate Assessment) for Broadland, Norwich and South Norfolk” Add under new heading at end of list “Task 2 (Mott Macdonald, update Feb 2010)” Under Research and studies : Transport	Updated information Updated information Updated information	Internal Internal Internal “ Internal	Reg 30

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
			Environment Under 4 th bullet point add at end of list Add “Stage 2b Final (Scott Wilson 2010) with Natural England response and Stakeholder Position Statements”			
MC 53	Page 101	Background documents, Broadland	Add: • Various conservation area appraisals • Broadland PPG 17 open-spaces, indoor sports and community recreation assessment (2007) • Broadland District Landscape Assessment and Review of Areas of Important Landscape Quality (1999) • Broadland District Landscape Character Assessment (2008)	Correction	Internal	Reg 30
MC 54	Page 101	Background documents, City	Add: • Northern City Centre Area Action Plan (Adopted Spring 2010)	Updated information	Internal	Reg 30
MC 55	Page 112	Appendix 7, water	Replace all references to “AMP” for water (potable water and waste water) infrastructure with “AMP/Developers”	Clarification and correction	Anglian Water (11584)	Reg 30
MC 56	Page 114	Appendix 7, water	Under “waste water, option 1”, in the “critical to” column replace “whole GNDP area” with “Norwich policy area”	Clarification and correction	Internal	Reg 30
MC 57	Page 115	Appendix 7, electricity	5th column headed “ Critical to”, 5th entry down, replace “South Norfolk Growth Location” with” South Norfolk Growth”	Clarification	Internal	Reg 30
MC 58	Page 119	Appendix 7, transportation	Under “bus priority route via B1172, replace “Developer” with “Developer Contributions”	Clarification	Internal	Reg 30

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
MC 59	Page 120	Appendix 7, transportation	Amend description from “Relocated rail station at Rackheath” with “Relocated rail station at Rackheath and new station at Broadland business park” In ‘estimated cost (£m)’ column, replace “25” with “50”	Consistency with policy 10	Government Office (11568)	Reg 30
MC 60	Page 120	Appendix 7, transportation	Add new scheme: “Pedestrian and cycle links to Norwich urban area, Broadland Business Park, Airport employment area, Rackheath employment area and surrounding countryside” Promoter/Delivery Body: “Norfolk County Council/developer” Estimated Cost (£m): “to be added” Funding Sources: “NCC/ DfT/growth point/developer contributions” Critical to: “Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle” Estimated delivery dates by: “2011 – 2031”	Consistency with policy 10	Government Office (11568)	Reg 30
MC 61	Page 122	Appendix 7, community and local services	Fire service: ‘Funding Sources’ column to read “Norfolk County Council/developer contribution”	Clarification and correction	Internal	Reg 30
MC 62	Page 124	Appendix 7 community and local services	First Column, after South Norfolk, delete “88 officers” and replace with “89 officers”	Mathematical correction	Internal	Reg 30

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
MC 63	Page 124	Appendix 7 community and local services	Norfolk Constabulary: 'Funding Sources' column to read "Norfolk Constabulary/developer contribution"	Clarification and correction	Norfolk constabulary (11594)	Reg 30
MC 64	Page 127	Appendix 7, healthcare	Pages 127, 128 and 129: for each scheme 'Funding Sources' column to read "Health Authority/ developer contribution"	Clarification and correction	Internal	Reg 30
MC 65	Page 133	Appendix 7, green infrastructure	For each scheme 'Promoter/Delivery Body' column to read "GNDP to co-ordinate delivery involving a wide range of statutory, non statutory and voluntary bodies, and developers"	Completion	Internal	Reg 30
MC 66	Page 135	Appendix 8, monitoring framework	For indicator on 'Affordable housing completions' "Target" column to read "40% of all developments on new allocations, or above qualifying threshold where permission is first granted after adoption of this strategy"	Completion	Internal	Reg 30
MC 67	Page 146	Appendix 8, monitoring framework	For indicator in 'Recognised participatory design process' the 'Target' column to read "Use for all major growth locations – over 500 dwellings"	Clarification	Internal	Reg 30
MC 68	Page 150	Glossary	Add: "Health Impact Assessment – an assessment to judge whether a development proposals may have an impact on health or health inequality in terms of its effects on health and social care services, or wider lifestyle related considerations or factors such as crime, social cohesion, movement or air pollution, for example."	Clarification	Internal	Reg 30
MC 69	Page 154	Glossary	Add : "Special Area of Conservation (SAC)"	Clarification	Internal	Reg 30

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
			Special Areas of Conservation are defined in the European Union's Habitats Directive (92/43/EEC), also known as the Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora. They are defined to protect the 220 habitats and approximately 1,000 species listed in Annex I and II of the directive which are considered to be of European interest following criteria given in the Directive."			
MC 70	Page 154	Glossary	Add "Special Protection Areas (SPAs) Special Protection Areas are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive, which came into force in April 1979. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species."	Clarification	Internal	Reg 30
MC 71	Various	Presentational	In final document number paragraphs within policies for ease of future reference	Convenience of use	Internal	Reg 30

Table 2 – All proposed minor changes since Submission

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
MC 72	8	Last para of first column	In the case of Broadland, the historical pattern of development lends itself to further expansion with new growth locations in the parishes of Old Catton, Sprowston and Thorpe St Andrew, and the development of an eco-community a low carbon development focussing on Rackheath, given its existing employment opportunities and railway line	Changes to Govt and eco-town programme		Post-submission
MC 73	13	2.8	Delete and replace with : The JCS has to comply with national planning policies and demonstrate how required growth can be delivered. At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked. However, the JCS is supported by a significant evidence base that demonstrates that it remained valid and its policies do not rely on the East of England Plan. Prior to adoption references to the East of England Plan have been simplified	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission
MC 74	14	Footnote	Delete	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP		Post-submission

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
				would be revoked.		
MC 75	14	2.10	Delete	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission
MC 76	14	2.11	Delete and replace with the JCS should not repeat national or regional policies. Users of this strategy will need to refer to Government policy documents and the East of England Plan, while it remains in place.	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission
MC 77	18	3.20	Delete sentence "They are identified in the East of England Plan as 'Key Centres for Development and Change'".	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission
MC 78	21	4.3	Delete and replace with: The spatial vision acknowledges significant changes to the area required to meet the	At the time of its Adoption the JCS is required to be in conformity with the		Post-submission

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
			ambitious targets for the new homes and jobs that the area needs.	East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		
MC 79	22	Spatial vision: Climate change and sustainability, 3 rd bullet	inspired by the proposed exemplar eco-community development at Rackheath, zero carbon development will be the standard to be achieved through advances and innovation in the design, construction and management	Changes to Govt and eco-town programme		Post-submission
MC 80	22	footnote	Delete	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission
MC 81	26	Objective 2	Delete first sentence	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission
MC 82	32	Policy 1, right hand column, last para., line 1	Change 'The built environment, heritage features, and the wider historic environment will be conserved and enhanced through...'	English Heritage SoCG		EIP

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
			To 'The built environment, heritage assets, and the wider historic environment will be conserved and enhanced through...'			
MC 83	33	5.3	In last sentence, correct spelling of "brownfield"	Typo		EIP
MC 84	34	Policy 1, references	Add Green Infrastructure Delivery Plan	Matter 8		EIP
MC 85	38	Policy 2, references	Add reference to PPS 5	English Heritage SoCG		EIP
MC 86	39	5.15	Change 'The technical potential of renewable energy was found to be over 160% of the area's consumption' to 'The technical potential of renewable energy was found to be over 129% of the area's consumption'	Matter 8		EIP
MC 87	40	5.22	Replace final sentence with: "Therefore, in the light of the study, level 4 Code for Sustainable Homes water standards are required in smaller scale housing development and level 6 standards are required in larger scale housing development over 500 homes."	Matter 8		EIP
MC 88	42	5.24	Delete and replace with: The planned level of housing growth is required to address housing need and support the growth potential of the local economy. The Norwich Policy Area (NPA) is a longstanding local planning area used to ensure that growth needs arising from the Norwich urban area are addressed as close to it as possible. The Table on page 43 illustrates the distribution of growth between the NPA and remaining parts of Broadland	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
			and South Norfolk. Provision is made for the period up to 2026 to meet the requirement in PPS 3 to have a 15-year housing land supply at the point of adoption. New allocations in the NPA will total to a minimum of 21,000 dwellings. Outside the NPA new allocations for the majority of individual locations are expressed as a range. The extent to which delivery of housing is meeting these requirements will be monitored using housing trajectories for the three district area and the NPA (Appendix 6). Modify Table on Page 43 (see below) to: Delete top part of the table under "Housing requirement" i.e. title row and next 5 rows Delete columns b, c, e, f and g Insert title for new 2nd column "Current Commitment 2008" Delete final row. Add to References box on page 45 East of England Forecasting Model Spring 2010.			
MC 89	44	Para 5.29	Add final sentence: "Any assessment of viability will take into account policy implications for energy and water efficiency as set out in Policy 3."	Matter 8		EIP
MC 90	46	Policy 5, 7 th bullet	Change 'land identified for employment uses whether existing or newly allocated' to "land identified for employment uses on proposals maps"	Matter 9		EIP

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
MC 91	48	5.37	Delete 2 nd sentence and replace with : Research suggests that the local economy has the potential to provide sufficient jobs to support the level of housing growth proposed. Indeed jobs growth will be dependent on housing growth.	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission
MC 92	50	5.44	Add sentence: "The corridor currently protected (100m either side of the centre line of the current scheme) and the associated Postwick Hub will be shown on the Broadland District Council adopted Proposals Map"	Matter 1b		EIP
MC 93	50	5.46	Modify first bullet to: The NDR is recognised in the East of England Plan. Prior to changes in regional planning and government funding regimes, the NDR was supported through the Regional Funding Allocation and achieved "programme entry status". It is a major scheme in the Local Transport Plan and is included in the Department for Transport's Development Pool.	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission
MC 94	Page 50	Para 5.48	Modify sentence "To comply with the East of England Plan and sustainability objectives of the Joint Core Strategy, public transport will be prioritised, particularly in the urban areas" to 'To comply with sustainability objectives, public transport...'	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under		Post-submission

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
				proposed legislation the EEP would be revoked.		
MC 95	55	6.1	Delete 6.1 and replace with: Norwich is one of the largest and most important urban centres in the East of England with the potential to contribute significantly to the country's growth and economic development needs. A Norwich Policy Area is defined to provide a focus for planning and co-ordinating Norwich related growth. The Joint Core Strategy area is also characterised by its small towns and villages and this part of the strategy provides guidance to meet their development needs.	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission
MC 96	55	6.2	Delete first part of 6.2 and replace with: The policies of the Joint Core Strategy (JCS) distribute growth according to the following settlement hierarchy:	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission
MC 97	57	6.4	Delete Norwich is identified by the East of England Plan (EEP) as a Regional Transport Node and the Key Centre for Development and Change to accommodate the greatest amount of new development in the area.	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP		Post-submission

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
				would be revoked.		
MC 98	57	6.5	To remove references to the RSS and remaining unnecessary duplication with Policy 9, delete all the first part of the paragraph to leave: Development is focussed within the established urban area and in sustainable locations elsewhere in the Norwich Policy Area including major greenfield developments. Numerous brownfield sites have been developed in recent years and some further opportunities remain. In the short term, brownfield sites provide a significant proportion of land available for development, but this will decline as fewer become available and large greenfield allocations come on stream.	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission
MC 99	57	6.6	The Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle incorporates land at Rackheath being promoted for an eco-community under the previous government's Eco-towns programme and development of the rest of the area will be expected to reflect similar high standards.	Change in Govt, and eco-towns programme		Post-submission
MC 100	61	NATS – proposed implementation plan	Amend box City Centre transport initiatives to include the text “including cross city centre public transport and walking and cycling enhancements”			EIP
MC 101	62	Policy 10	Delete first column/third bullet point and			EIP

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
			replace it with the words: “seek to achieve a high level of self-containment through the provision of services to support the new development while integrating well with neighbouring communities”			
MC 102	64	Wymondham, Bullet 7	Change ...”is likely to”... To ...”may”...	Matter 4		EIP
MC 103	64	Wymondham, after last bullet	After last bullet add: detailed proposals will be developed through the preparation of an Area Action Plan	EIP79		EIP
MC 104	64	Hethersett, 3 rd bullet	Change ‘education provision remains to be resolved but will require the relocation of the existing junior school and/or high school to new sites plus additional pre-school and primary provision’ To ‘education provision remains to be resolved but may require the relocation of the existing junior school and/or high school to new sites plus additional pre-school and primary provision’	Matter 4		EIP
MC 105	64	Hethersett, after last bullet	After last bullet add “detailed proposals will be developed through the preparation of the South Norfolk Site Specific Policies Development Plan Document”	EIP79		EIP
MC 106	65	Cringleford, after last bullet	After last bullet add “detailed proposals will be developed through the preparation of the South Norfolk Site Specific Policies Development Plan Document”	EIP79		EIP
MC 107	65	Long Stratton after last bullet	After last bullet add: detailed proposals will be developed through the preparation of an	EIP79		EIP

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
			Area Action Plan			
MC 108	65	Easton/ Costessey, after last bullet	After last bullet add “detailed proposals will be developed through the preparation of the South Norfolk Site Specific Policies Development Plan Document”	EIP79		EIP
MC 109	66	6.12	Delete sentence “The East of England Plan requires that most of the growth within the plan will be located in the Norwich Policy Area (NPA), and in particular served by greatly enhanced public transport, walking and cycling” and replace with: Most of the growth within the plan will be located in the Norwich Policy Area (NPA) where it can be best served by greatly enhanced public transport, walking and cycling.	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission
MC 110	66	6.14	A large part of the development at Rackheath is was promoted as an eco-community under the previous Government’s Eco towns programme. The Rackheath eco-community will remain low carbon development remains part of this strategy. even if the Government programme falters.	Change in Govt, and eco-towns programme		Post-submission
MC 111	68	After 6.23	Add additional new paragraph to supporting text: The policy provides for new communities and a wide range of development. Consequently the provision of new services and infrastructure will also have wider benefits for existing communities. The policy aims in this	Matter 3a		EIP

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
			respect do not require developers to directly fund existing deficiencies.			
MC 112	71	Paragraph 6.24	Paragraph 6.24 Insert "net" after 20,000m2	Matter 7		EIP
MC 113	71	Paragraph 6.24	Insert in column 2 of page 71 after "JCS period". "Brazengate and Riverside shopping areas, formerly designated as part of the Primary Retail Area, are redesignated under this strategy. Both areas are "other shopping areas" on the city centre key diagram. Brazengate, an edge of centre retail area in the south of the city centre serving the convenience goods needs of southern Norwich, is defined as a secondary part of the city centre. Riverside, part of an out of centre mixed use leisure, housing and retail area with both convenience and large scale comparison good outlets, is defined in policy 19 as a Large District Centre. These designations are reflected by changes to the Norwich City Proposals Map. Both areas remain high in the retail hierarchy, and some further retail development may be appropriate. The purpose of these redesignations is to ensure that the majority of future comparison goods retailing development need is met within or on the edge of the Primary Retail	Matter 7		EIP

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
			Area. This will ensure that the sustainably accessible core retail area of the city centre remains a vital and vibrant area, a key element of the local economy and one of the top ten retail centres in the country.”			
MC 114	85	6.59	Delete second sentence	Matter10		EIP
MC 115	86	Policy 16 between last two bullet points	Insert the following text: “N. B. This policy will necessitate a number of changes to the adopted proposals maps for Broadland and South Norfolk. New settlement limits will be needed for Aldeby, Burgh St Peter, Caistor St Edmund, Claxton, Colton, Denton, Flordon, Forncett St Mary, Great Melton, Hardwick, Hedenham, Keswick, Ketteringham, Langley Street Marlingford, Shotesham, Starston, Swainsthorpe, Tibenham, Tivetshall St Margaret, Tivetshall St Mary, Toft Monks, and Topcroft Street. These will be defined through the preparation of the South Norfolk Site Specific Proposals Development Plan Document A limited number of existing settlement limits shown on the adopted proposals maps for Broadland and South Norfolk will be deleted. This applies to Felthorpe, Honingham, Upton, Ranworth, Wacton, Weston Longville and Woodbastwick. The policy change making this necessary will take effect on adoption of			EIP

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
			the Joint Core Strategy”			
MC 116	90	Paragraph 6.71	Delete the first sentence paragraph 6.71 and replace with: "In terms of the retail hierarchy, Norwich City Centre contains a number of retail areas as illustrated on the Norwich City Centre key diagram on page 73. The primary retail area is at the highest level in the retail hierarchy, and the Large District Centres of Anglia Square/Magdalen Street and Riverside are at the second level. Policies towards other and specialist shopping areas, a number of which supplement and support the primary retail area, will be set out in other Development Plan Documents. The Large District Centres, plus eleven other District Centres within the Norwich urban area, meet the daily needs of their local resident populations."	Matter 7		EIP
MC 117	111	Growth location table	First line: Replace 'Rackheath Eco-community' with 'Rackheath'.	Change in Govt, and eco-town programme		Post-submission
MC 118	150	Glossary	Delete: glossary definition of Key Centres for Development and Change - Areas specified in the East of England Plan as locations for development and change.	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission

Reference	Page No.	Paragraph/Policy	Proposed Change	Justification	JDI No.	Stage submitted
MC 119	151	Glossary	Delete sentence “Local transport plans should be consistent with the policies and priorities set out in the Regional Transport Strategy as an integral part of the Regional Spatial Strategy”	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission
MC 120	154	Glossary	Delete glossary definition of a Structure Plan: The part of the former development plan system which sets out the broad framework for development in Norfolk. The current structure plan prepared by Norfolk county was adopted in October 1999. It will be superseded by the East of England Plan, when adopted, though certain structure plan policies will be ‘saved’ in the East of England Plan.	At the time of its Adoption the JCS is required to be in conformity with the East of England Plan (EEP). Under proposed legislation the EEP would be revoked.		Post-submission