

Note from the Inspector to GNDP concerning the proposed changes to the Proposals Maps of the 3 local planning authorities:

P2 of the JCS states that the submission documents include ‘the changes to the Proposals Maps’. These are included in Document JCS4 and appear to consist of:

Broadland

- Definition of the boundary of the Norwich Policy Area
- Definition of the route of the Norwich Northern Distributor Road
- Allocation of the Growth Triangle within defined outer boundaries
- The deletion of a number of settlement limits (at Honingham, Horsford, Horsham St Faith, Old Catton, Rackheath, Ranworth, Salhouse, Spixworth, Sprowston, Thorpe End, Thorpe Marriott, Thorpe St Andrew, Upton, Weston Longville, and Woodbastwick).

Norwich

- Two proposed changes at Brazengate (Sainsbury) Shopping Area and Riverside Shopping Area [It is unclear from JCS4 what these changes involve]

South Norfolk

Symbolic depictions showing, in a non site-specific way:

- Settlements where new development boundaries are to be defined where none exists (at Colton, Marlingford, Great Melton, Keswick, Kettringham, Caistor St Edmund, Swainsthorpe, Florden, Bergh Apton, Bramerton, Claxton, Langley St, Shotesham, Aldeby, Burgh St Peter, Hedenham, Toft Monks, Alburgh, Denton, Hardwick, Starston, Tivetshall St Mary, Tivetshall St Margaret, Topcroft St, Carleton Rode, Fornsett St Mary and Tibenham)
- Proposed major growth locations requiring an Area Action Plan (Wymondham and Long Stratton)
- Other proposed major growth locations (Easton Costessey, Hetherset, and Cringleford)
- Other proposed Area Action Plans (Norwich Research Park and Diss)
- A village development boundary to be deleted at Wacton.

Definition of the route of the proposed Long Stratton bypass as permitted June 2005

Issues that arise are:

Settlement boundaries After careful examination of the JCS policies it is possible to surmise that settlement boundaries may be proposed for first-time definition where the village in question is to be designated a service village or an ‘other’ village under policies 15 and 16. On the other hand, it seems that settlement boundaries may be proposed for deletion either (a) where the JCS is effectively proposing to treat them as part of the smaller communities under policy 17 or (b) because they fall within the proposed allocated Growth Triangle.

It is not satisfactory to JCS-users that these matters are left unexplained, and it should be possible to make some minor alterations to the text to make these points clear.

In the case of boundary deletions, the alterations to the PM are clear and ‘worthwhile’ in the sense that the outcome of the change is clear, albeit not perhaps of major core strategic significance.

On the other hand, indicating the future definition of new boundaries on the PM itself is of more questionable worth. Suitable minor changes to the text could signal that such changes are to come and explain the relevant DPD that will be used to consult with the public on the detail of the changes. This would be more helpful to the reader than the ‘boundaries-to-come’ symbols on the PM.

Changes to the Norwich PM            Owing to the absence of a key, it is unclear what these consist of. More importantly, I have not found anything in the JCS that would alert the reader to the fact that any changes have been made to the PM, still less any explanation of (or justification for) them. Since a Core Strategy is not normally site specific, except for major core strategic allocations, most users of the JCS would probably be surprised to find that these unexplained changes to the PM have been introduced via this route. Is there another forthcoming DPD which could more appropriately (and more transparently) propose these changes?

Norwich Policy Area            There is an issue of consistency in that the NPA would be defined on the PM in Broadland but not in Sth Norfolk.

Norwich Northern Distributor Road            Does the JCS anywhere explain that the detailed route of the road is being introduced to the PM for the first time?

Symbols concerning 2\* & 3\* growth locations and 'other AAPs' (South Norfolk)  
These symbols can give no useful site-specific information to the user of the JCS and therefore seem to have little purpose. It would be considerably more helpful if the text of the JCS provided information cross-referred to the LDS about the scope and timing of the AAPs and the processes by which the other non-AAP growth locations will be taken forward.

I hope you will find these observations thought-provoking and useful and would be grateful for your response in due course.

Roy Foster  
6 August 2010

## **Draft response to inspector concerning the proposed changes to proposals maps of the three local planning authorities**

In response to the issues raised by the inspectors in their note dated 6 August 2010, the GNDP would offer the following comments

### **1. Changes to the defined settlement boundaries**

It is accepted that a minor change consisting of an explanatory note following Policy 16 would help to make the document more user friendly and remain consistent with the changes to the proposals maps proposed.

This might take the form of text such as:

“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 the Joint Core Strategy”

A similar note would be needed following Policy 15, as follows:

“N. B. 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”

In the case of the Broadland district settlements of Horsford, Horsham St Faith, Old Catton, Rackheath, Salhouse, Spixworth, Sprowston, Thorpe End, Thorpe Marriott and Thorpe St Andrew the published changes to the proposals maps do

not propose changes to settlement limits, and these will need to continue in force unless/until amended by new site specific policies. The changes to these proposals maps are solely concerned with the definition of the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle, and/or the route of the Northern Distributor Road.

## **2. Changes to the Norwich proposals map**

Justification for these amendments is covered in responses to Matter 6.

It is accepted that it is necessary to add a key to explain proposals map amendments.

The amendments made are part of the overall changes to city centre policy set out and consulted on through the JCS. In the adopted Replacement Local Plan both Riverside and Brazengate are classified as primary retail areas. Policy 19 on the retail hierarchy and accompanying text of the Regulation 27 and 30 consultation and submission versions of the JCS named Riverside as a large district centre, stating that, like Anglia Square/Magdalen Street, it supplements Norwich City Centre. The key diagram for the city centre, supporting Policy 11, of both the Regulation 27 and 30 documents identifies Brazengate as an “Other Shopping Area”, not part of the primary retail area. The same diagram identifies Riverside as an “Area of Change”, with a focus on commercial development. This change in policy is referred to in the city centre topic paper accompanying the Regulation 27 document. In addition, the proposals map for the Regulation 30 version shows Brazengate as a secondary shopping area and Riverside as a large district centre.

A representation to the Regulation 27 consultation opposing the redesignation of Riverside was received from Henderson Retail Warehouse Fund. Sainsburys Supermarket Ltd, the operators of Brazengate, objected to other retail hierarchy issues, but not to the redesignation of Brazengate.

Whilst these changes could be made through the Development Management DPD, they are made through this document as they are part of the overall strategy for the city centre.

## **3. Norwich Policy Area**

There is no inconsistency. The adopted South Norfolk Local Plan includes a specific map showing the boundary of the Norwich Policy Area. The adopted Broadland Local Plan proposals map shows the boundary of the Norwich Policy Area. The proposed amendment is to update the Broadland proposals map by the addition of the parish of Salhouse, not at present included in the Norwich Policy Area.

#### **4. Norwich Northern Distributor Road**

The JCS does not explain that the detailed route of the NNDR is being introduced to the proposals map for the first time. This has not been regarded as essential, but if the inspectors consider it helpful, a note to the effect of “the proposed route is shown on the Broadland District Local Plan proposals map” could be added following the first bullet point in Policy 6.

#### **5. Major growth locations and area action plans in South Norfolk**

The symbols proposed for addition to the proposals maps are not intended to give site specific information, since the core strategy is not expected to be site-specific with the exception of strategic allocations. They are intended to alert users of the proposals maps to the fact that, as a consequence of policies in the JCS, other documents are likely to propose significant future changes in the area.

It is accepted that this could usefully be augmented by cross references in the text. These might take the following forms:

- In Policy 10, following the sections on Wymondham and Long Stratton, insert footnotes saying “detailed proposals will be developed through the preparation of an Area Action Plan.”
- In Policy 10, following the sections on Hethersett, Cringleford, and Easton/Costessey, insert footnotes saying “detailed proposals will be developed through the preparation of the South Norfolk Site Specific Policies Development Plan Document.”
- In Policy 9, following bullet point relating to the expansion of science park activity at the University of East Anglia/Norwich Research Park (NRP), insert a footnote saying “in view of the specific nature of the employment sought in this location, including the need to dovetail with the aims of significant and diverse existing institutions, detailed proposals will be developed through the preparation of an area action plan, and a master plan for the UEA.”
- The situation at Diss is adequately covered by the text in paragraph 6.37 which explains the need for an AAP in view of the complexity of the site in the centre of the historic town and the need to define an appropriate mix of uses of and reconcile access issues.