

Background to the advisory visit.

1. As you know, the purpose of my visit is not to test material in the way that is done at the DPD examination, and I cannot confirm that any work done is adequate or that any part of the DPD is sound, or unsound. Quite apart from not having the time to do this, it would be entirely inappropriate to pre-judge matters that should properly be considered at the examination. My aim is to prompt you to think about matters and questions that appear at this stage to be potentially contentious or problematic.
2. Following the issues and options consultation in the winter of 2007/8, the GNDP carried out a technical consultation (under Reg.25) in August/September 2008. This consultation featured three options for accommodating major development.
3. In view of the time constraints, I make some general comments on the evidence base and have then focussed on the options for major development, as that appears to be the most contentious issue. I do not comment in detail on procedural matters or organisational issues.

General comments

4. A CS should include an overall vision which sets out how the area and the places within it should develop, strategic objectives focussed on key issues and a delivery strategy for achieving these objectives, as well as arrangements for monitoring and managing delivery. (PPS12 para 4.1). The basic questions to be addressed in a CS are (see PAS Manual):
 - **What** will be delivered
 - **When** will it be delivered
 - **How** will it be delivered
5. The strategy must be **justified**: that is founded on robust and credible evidence and the most appropriate strategy when considered against the reasonable alternatives (PPS12 para 4.36). The choices made in the CS need to be backed up by research/fact finding. The CS must be **effective**, that is deliverable, flexible and able to be monitored (PPS12 para 4.44). The CS must also be **consistent** with national policy. There is also a legal requirement that the plan conforms generally to the RSS.
6. So far as consultation is concerned, the new regulations encourage a targeted approach, and I can see no obvious reason why the work undertaken so far would conflict with the Regulations. You will also need to demonstrate that the requirements of the SCIs for the constituent authorities have been met, and this is one of the matters covered in the PAS self-assessment toolkit.

7. It is not part of my brief to comment on propriety or decision-making structures. I understand PAS has already undertaken a diagnostic visit which will have covered some of these issues.

Evidence base

8. This should be proportionate, relevant and as up to date as practicable. The Inspector will not examine the evidence base as an end in itself, but may need to look at aspects of it in detail when considering the soundness of a strategy or policy.
9. The key evidence should be in place before submission. A rigorous approach to appraising all reasonable options will help to dispel any impression of justifying a predetermined stance. If a thorough approach to preparing the CS has been followed and the audit trail properly documented, there should be little need for additional information to be produced after submission.
10. In the context of this exercise, it would be inappropriate for me to come to any firm conclusions about the adequacy, or otherwise of the evidence base in general terms. However, it is evident that a good deal of work has been undertaken and much of the work that would normally be expected has been done (SHLAA, SHMA, SFRA, retail and employment studies etc.) Once you have a draft of the CS you may wish to critically evaluate what is the justification for each policy and proposal and what are the facts/analysis that back this up.
11. I note that a sustainability appraisal has informed the work undertaken to date. The appraisal has been audited by a firm of consultants who are known to have considerable expertise in this field of work. I have not looked in detail at the SA, but I assume it is available for public scrutiny. It should also be borne in mind that SA is intended to be an iterative process, and that as further details of development proposals are clarified, there will be a need to revisit the SA.
12. Similarly, I have not checked the contents of individual consultation responses against the summaries given in the committee reports before me. However, the detail in the reports would enable respondents to identify their responses and it would be open to them to comment if they felt the summaries to be inaccurate or misleading.
13. So far as the relationship between the Sustainable Community Strategies and the CS is concerned, it may be useful to have greater cross-referencing in the final form of the CS. I understand that work was undertaken at an earlier stage to distill the main points from the authorities' SCS, and this could form part of the evidence base.

14. One key area of work is the Infrastructure Need and Funding Study. An early study was completed in 2007, and further work is now being undertaken by the same consultants. Given the scale of growth programmed for the NPA, and the levels of infrastructure necessary to accommodate it, I consider this work to be a key component in ensuring that the CS can meet the 'effectiveness' test of soundness.
15. I note that the study brief includes requirements for assessments of all infrastructure requirements, costings, timings, and sources of funding. It will also consider the appropriateness of a CIL approach. You advised me that it will include a viability assessment to underpin policies for affordable housing. There is some reference to this in the brief, but you may wish to confirm that this work will meet the requirements of PPS3, in the light of the Blyth Valley judgement (see separate note prepared by a colleague Inspector). At submission you will need to have evidence that all infrastructure providers agree that there is a reasonable prospect that the crucial components of infrastructure can be provided at the appropriate time. As yet, there is little information on when, during the plan period, the various growth locations are expected to be implemented. The level of detail required on infrastructure provision will be greater for those schemes expected to deliver at an earlier point in the plan period. For larger schemes, what is the expected phasing and how does this relate to the delivery of infrastructure?
16. I note the concern expressed by the GO regarding Appropriate Assessment under the Habitats Directive. You advised me that work is progressing but appears unlikely to generate any show-stoppers. This work will need to be made available for public inspection.
17. Any target for development on brownfield land must have regard to the RSS. However, that is a target across the whole region, and it may be that some areas will be able to achieve levels above the regional target, whereas as others will be lower. For example, if it can be demonstrated that significant development on greenfield sites is necessary to meet housing targets, as may be the case with a number of growth points, the brownfield target should reflect that. As with all other aspects of the Plan, it will be necessary to have a clear evidence base to justify the stance taken.

Options for major development

18. The Regulation 25 Technical Consultation outlined 3 options. All three options adopt the same approach to the quantum and location of growth in Norwich and Broadland. The options differ in their approach to locations for growth within South Norfolk.

19. It would be helpful to provide a clear audit trail of the alternatives considered for Norwich and Broadland, and the reasons for decisions taken. All reasonable options should be evaluated. It may be that within the City the options are highly constrained because the boundary is so tightly drawn. If that is the case, and there is no clear evidence to the contrary, it need not be a lengthy explanation. There may be a need for further work to provide an audit trail for the spatial choices in Broadland, but this should hopefully be a case of drawing together work already undertaken, rather than commissioning new studies (expand on para 1.4 of 18 December Policy Group item 5a). As an aside, it is encouraging to note that the Eco-town proposal at Rackheath would not be a departure from the preferred growth strategy.
20. So far as the 3 options for South Norfolk are concerned, a comprehensive analysis of all three has been prepared, which includes the summaries of consultation responses, advantages, disadvantages and risks. A further option, described as 2a, has subsequently been introduced. The only information I have seen relating to this option is a short paper (2.5 sides of A4), and a limited evaluation by GNDP Officers in the covering Committee report of 18 December. It is described as an evolution of Options 2 and 3. It redistributes proposed housing development between the locations identified in those options.
21. The paper states that the option has taken account of two strategic planning principles. It is not clear how these principles relate to national or regional policies, or to the vision and strategy set out in the Reg 25 consultation document. Will these principles stand up to the scrutiny they will be subjected to when the CS is subject to examination. For example, under a), why is the retention of strategic development gaps an overriding concern? (Urban extensions are often considered an appropriate way of accommodating new growth). Does the scale of growth proposed along the A11 corridor under Option 1 justify the conclusion that it would lead to a single urban extension? Under b), does central necessarily equal accessible, or is accessibility, particularly by public transport, a better indicator of accessibility?
22. There is nothing before me to demonstrate that this option has been evaluated in the same way as the options outlined in the Reg 25 consultation. On the face of it, it may be difficult to do so without further work, because no consultation has been carried out on this particular spread and of development. Even relatively minor adjustments in the quantum of development proposed at different locations can have a marked effect on the ability to deliver necessary infrastructure. I note, for example, that EERA expresses concerns about funding for the Long Stratton bypass, and public consultation responses at the issues and options stage appear to be equivocal about the level of growth that would be appropriate.

23. At the examination, the Inspector will assess whether the plan is the most appropriate when considered against reasonable alternatives. For the avoidance of doubt, I am not concluding that Option 2a is, or is not, the most appropriate. However, there is at present very little evidence to support a conclusion that it is. Without such evidence, there is a real risk that a Core Strategy based on Option 2a could be found unsound.
24. It seems to me that further work would need to be carried out on option 2a, particularly in relation to sustainability appraisal; deliverability; and its relationship to the overall vision and strategy, and general conformity with the RSS. You will need to consider the extent to which consultation undertaken for options 1, 2 and 3 can adequately inform the evaluation of option 2a, and undertake further consultation if necessary. Such consultation should be proportionate to the task.

Conclusion

25. It is evident that the GNDP has carried out a considerable amount of work towards the preparation of a joint CS, and the level of joint working between the three authorities is to be commended. However, work remains to be done to provide an audit trail demonstrating that the strategy is founded on a robust and credible evidence base; and the most appropriate strategy when considered against the reasonable alternatives. In my view, further work is required, and in particular a full evaluation of option 2a, before you could proceed with confidence to the Examination.

Laura Graham

17 February 2009