

**Baxter, Amy**

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**From:** POservices [REDACTED]  
**Sent:** 20 August 2010 15:38  
**To:** [REDACTED]  
**Cc:** Joint Core Strategy  
**Subject:** GNDP Core Strategy DPD Examination  
**Attachments:** GNDP - Preliminary programme.doc; GNDP - Invitation and guidance re statements.doc; GNDP - Matters (attachment 2).doc v4.doc

I am attaching the following documents:


1. An invitation and guidance to participants about submitting statements - this is an amended and briefer version of the guidance that I distributed before the Exploratory Meeting. The Inspectors do not believe that there is a need for a Pre-Hearing Meeting and these guidance notes concentrate on giving information about how to submit statements and what will happen at the hearings.
2. A provisional programme for the hearing sessions running to three weeks.
3. A list of matters and key questions to form the basis for written responses.

The Inspectors ask that everyone submit any further submissions that they wish to make available by **8 October 2010**. **Please note that there is no requirement for participants to submit anything further.** Most participants tend to rely on their original representations. These original representations will carry exactly the same weight with the Inspectors as any further submissions.

Please let me know if you have any questions. My deputy Programme Officer, Louise St John Howe will be answering on my behalf whilst I am away for a few weeks.

Finally, I apologise if you have already received this information from me last night. I am keen that the information is disseminated as quickly as possible and since we have been in email communication, I wanted you to be one of the first to receive it. **The matters (attachment 2) has changed slightly as has the preliminary programme. It is inevitable that everything is subject to change until the start of the hearing sessions.**

Yours sincerely  
Simon Osborn  
Programme Officer

**Examination into the Joint Core Strategy for  
Broadland, Norwich and South Norfolk produced by  
the Greater Norwich Development Partnership  
Inspectors • Inspector Roy Foster MA MRTPI and Assistant Inspector  
Mike Fox BA(HONS) DIPTP MRTPI**



**INVITATION AND GUIDANCE TO RESPONDENTS ON THE SUBMISSION OF  
STATEMENTS FOR THE FORTHCOMING HEARINGS SESSIONS**

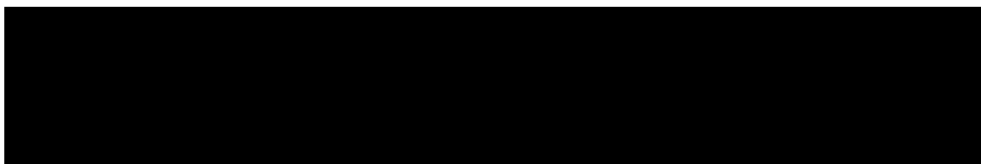
**The Inspectors**

- 1 The Inspectors appointed to examine the JCS are Roy Foster MA MRTPI (Lead Inspector) and Mike Fox BA(HONS) DIPTP MRTPI (Assistant Inspector). Their role is to consider whether the submitted JCS is sound and whether the requirements of the Planning and Compulsory Purchase Act 2004 and associated Regulations have been met. In considering the soundness of the JCS they will focus on the tests of soundness set out in paragraph 4.52 of the relevant Government guidance on Local Development Frameworks (PPS12).

**The Programme Officer**

- 2 Simon Osborn is the Programme Officer. His main tasks are to liaise with all parties to ensure the smooth running of the Examination, to organise the Hearings Programme, to ensure that all documents received both before and during the Hearings are recorded and distributed, and to keep the Examination Library. Copies of all the Examination documents, including the representation forms and written submissions, will be available in the Examination Library.

The Programme Officer can be contacted on



Information about the examination is also posted on the website;  
<http://www.gndp.org.uk/our-work/joint-core-strategy/jcs-examination/>

**The Examination to date**

- 3 The Inspectors held an Exploratory Meeting on **13 May 2010** at which they expressed some initial concerns about soundness. These are summarised in a note dated **24 May** which can be found on the GNDP website (link above). At the meeting GNDP agreed to undertake some more work and reconsider certain matters. As a result some focussed changes to the JCS have now been published. These are available on the GNDP website and are subject to public consultation until **30 August 2010**.

## The Hearings Sessions

4 The hearings sessions will commence on **Tuesday 9 November at The King's Centre, King Street, Norwich**. A provisional programme is attached (**Attachment 1**), although this may be subject to some change. Morning sessions on Tuesdays to Thursdays will commence at 10.00 and afternoon sessions usually at 14.00. Friday sessions will usually end at 13.00 but may extend a little longer if necessary to complete outstanding business.

### List of matters and key questions for examination at the hearings

5 The Inspectors are now issuing a list of matters and key questions for examination at the forthcoming hearing sessions (**Attachment 2**).

### Invitation to participants to submit written statements

6 Those who made representations about the JCS are invited to respond in writing to the Inspectors' matters and key questions by **Friday 8 October 2010**. GNDP is invited to respond on the same basis. Non-submission of a statement by that date will be taken as an indication that the person or organisation concerned is content to rely on their original representations.

7 All written responses should be carefully structured to respond directly to any or all of the Inspector's matters and key questions and observe the following format:

- clearly marked in the top right hand corner with the relevant matter number and representor reference number
- limited to not more than 3,000 words on any one of the main matters (If more detailed material needs to be submitted it should be in the form of appendices (see below) but any such material should NOT duplicate the content of documents already included in the Examination Library
- limited to A4 size with any plans folded so as not to exceed that size
- include paragraph and page numbers
- show any measurements in metric units
  
- Any appendices should have a contents page and all pages should be numbered consecutively. Where these and/or maps and other diagrams contain coloured material, additional hard copies will be required and the requisite number should be checked in advance with the Programme Officer.
  
- A separate statement should be submitted for each matter addressed.
  
- **Six hard copies of any statement should be submitted – with one of these copies being loose leaf. In addition a single electronic copy in MS Word format should be sent to the Programme Officer as an e-mail attachment by the deadline stated above.**

### Procedure at the hearings

8 Participants' written statements will be made available to everyone taking part in a particular hearing session, thus ensuring a prior opportunity for all to be aware of others' views. Once the statements have been submitted, the Inspectors will prepare agenda for each of the hearings sessions, drawing both on the content of the statements and on the representations already made about the JCS. The agenda will identify any common themes

emerging from the statements and place the focus on the main soundness-related issues that need to be discussed at the individual sessions. The Inspectors will aim to circulate these hearing agenda at least 2 weeks before the relevant session.

9 The hearing sessions themselves will take the form of round-table style discussions chaired by the Inspectors, and the agenda will normally identify a number of participants who will be invited to make the opening contributions to the discussion on a particular topic. GNDP will be invited to respond to matters raised whenever this is most appropriate and discussion will pass on from one item to the next when the Inspectors consider that they have obtained the information they need to consider the soundness of the JCS in that particular respect.

10 It should be noted that not all representations, nor every part of the JCS, is covered by the list of matters and key issues. The Inspectors can only consider representations insofar as they relate to the tests of soundness set out in PPS12.

### **The Examination library**

11 The Library is being maintained and updated by the Programme Officer during the Examination. It comprises the evidence base of policy statements, studies and other documents which are the background material to the JCS together with additional documents submitted by GNDP and others during the Examination period. Wherever possible, electronic copies of library documents are also available via the Examination website. To ensure availability, anyone interested in viewing any of the documents held in the library should first contact the Programme Officer.

12 During the Hearings Sessions the Programme Officer will have an office at the Kings Centre. The Examination Library will be available for inspection at any time prior or during the hearing sessions by arrangement. Reasonable requests for photocopying will be met wherever possible, subject to any charges that GNDP may make. However, please note that requests to assist with producing representors' evidence or copy large volumes of material cannot be met.

### **Site visits**

13 The Inspectors will make site visits during the Examination to see areas or sites that have been referred to. Most of these will be unaccompanied. However, if there are features that cannot be seen without going onto private land, respondents may make a request for an accompanied visit via the Programme Officer. The visit will then take place in company with the respondent (or their representative) and a GNDP officer. No further discussion on the merits of the respondent's concerns is permitted during the course of the site visit.

### **Close of the examination and submission of Inspectors' report**

14 The Examination will remain open until the Inspectors' report is submitted to GNDP. However, the Inspectors will not accept any further representations or after the hearing sessions have finished unless they have specifically requested such information. Any late or unsolicited material is likely to be returned.

15 At the close of the examination process the Inspectors will submit their report to GNDP, setting out binding recommendations. The date of submission will depend on the content, extent and length of the Examination and the Inspectors will confirm the likely date at the end of the last hearings session.

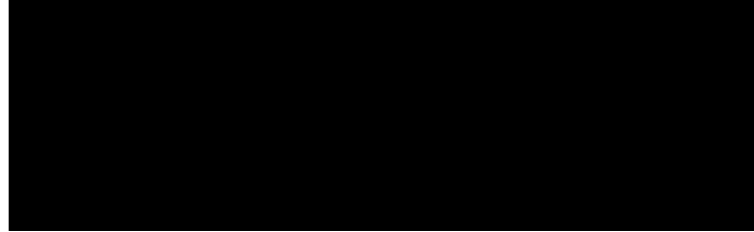
## **Disability**

16 Any participant who has a disability that could affect their contribution to the Examination should contact the Programme Officer as soon as possible so that any necessary assistance can be provided.

## **Pre-Hearing Meeting**

17 The Inspectors consider that it would not now be time-effective to hold a pre-hearing meeting. This note (together with the two attachments) should provide the necessary guidance. However, if you have further queries, please contact the Programme Officer.

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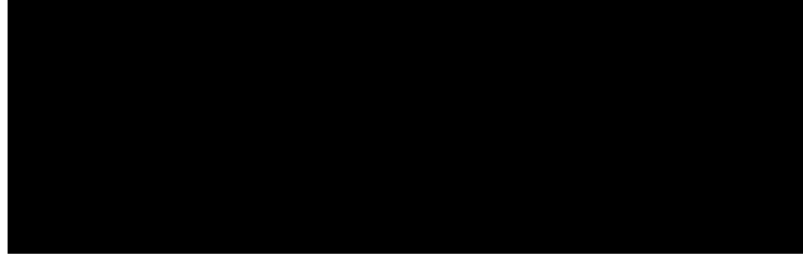
**ATTACHMENT 1**

**PRELIMINARY PROGRAMME FOR THE HEARINGS SESSIONS**

**Week 1**

9 November [AM]	Matter 1	Legal requirements & spatial vision/objectives
10 November [AM/PM]	Matter 2	Housing
11 November [AM/PM]	Matter 8	Sustainability, environment and design
12 November [AM]	Matter 9	The economy
<b>Week 2</b>		
16 November [AM]	Matter 3 Part A	Strategy for growth locations – general
16 November [PM]	Matter 3 Part B	The growth triangle
17 November [AM/PM]	Matter 3 Part B	[continued]
18 November [AM/PM]	Matter 3 Part C	Other major growth locations
19 November [AM/PM]	Matter 3 Part C	[continued]
<b>Week 3</b>		
23 November[AM]	Matter 4	Infrastructure delivery
23 November[PM]	Matter 5	Other transport issues
24 November [AM]	Matter 6	Norwich City Centre & the remainder of the Norwich Urban area including the fringe parishes
24 November [PM]	Matter 7	Aylsham, Diss and Harleston
25 November [AM/PM]	Matter 10	Service centres etc [policies 14-16]

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**ATTACHMENT 2**

**MATTERS & KEY QUESTIONS FOR EXAMINATION  
AT THE HEARINGS**

**Matter 1 (A) Legal requirements and (B) The spatial vision and the spatial planning objectives (JCS parts 01 & 04, including the key diagram at p29)**

**(A) Legal requirements:**

A1 Has the JCS been prepared in accordance with the relevant Local Development Schemes?

A2 Does the evidence (including the Regulation 30(d) and 30(e) statements and the GNDP's self-assessment paper) show that the JCS has been prepared in compliance with the Councils' Statements of Community Involvement?

A3 Has the JCS been prepared in accordance with the requirements of the 2004 Regulations (as amended) including those concerning the publication of the prescribed documents, their local advertisement and availability for inspection, the notification of DPD bodies, and the provision of a list of superseded saved policies?

A4 Have Sustainability Appraisal (SA) and Appropriate Assessment (AA) been undertaken, the latter under the Habitats Directive?

A5 Has the JCS had regard to the sustainable community strategies for the area adopted by the County Council, the City Council and the two District Councils?

*[The requirement for conformity to the Regional Spatial Strategy has now lapsed with the revocation of the East of England Plan.]*

(B) The spatial vision and spatial planning objectives (JCS parts 01 & 04 and the key diagram):

*[This will be a fairly high-level session not covering in much detail the strategy for the NPA set out in policy 9; that will be the subject of matter 2]*

B1 Are the spatial vision and objectives at part 04 of the JCS (and the strategy depicted on the key diagram at p29 of the JCS) justified, effective, and consistent with national policy?

B2 Was there adequate identification, consultation upon, and testing of 'reasonable alternative' spatial visions and strategies before the formulation of the submitted JCS? Is there a clear audit trail demonstrating the decision-making process by which the spatial vision and objectives of the submitted JCS were arrived at? If (in any aspect) a balance was struck between competing spatial alternatives, is it clear how and why the selected balance was struck?



**Matter 2 Does the JCS make sound provision for housing delivery?  
(policy 4 & Appendix 6: the housing trajectory)**

**General Housing:**

Comment: GNDP has decided to proceed with the housing figures included in the now revoked East of England Plan, following its judgement that the background justification for them remains sound. GNDP is preparing a topic paper explaining this.

A Is JCS's planned provision of housing land to 2026 justified, effective and consistent with national policy, including the recent changes to PPS3 Housing with regard to the status of garden land and the deletion of a national indicative minimum density?

B Is the JCS effective and clear about the mechanisms and timescales for achieving a supply of developable housing land for years 0-5 (and deliverable land for years 6-15) in the overall context of the 3 Councils' planned and programmed Local Development Documents (see para 53, PPS3)?

C If the JCS is unsound in relation to general housing policy, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

**Affordable Housing:**

D Is policy 4 (as amended by GNDP Focussed Changes 1-4) justified, effective and consistent with national policy in relation to Affordable Housing (AH)?

E Does the viability study by Drivers Jonas Deloitte, dated July 2010, provide sound evidence for the amended policy on AH? [see results and conclusions at p24-35]

F Does the JCS expressly fulfil the requirement of PPS3 para 29 for (a) a plan-wide target for the amount of AH to be provided, in terms of both social-rented and intermediate tenures, the size and type of AH, and the approach to developer contributions?

G National policy in PPS3 excludes housing for sale from the definition of AH, whereas the JCS includes it [see glossary at Appendix 9]. Are there any local circumstances to justify this departure from national policy?

H Does the JCS provide sufficient clarity about the phrase 'appropriate settlements' in the context of exceptions schemes?

J If the JCS is unsound in relation to AH, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

Gypsies and travellers:

K Is policy 4 (as amended by GNDP Focussed Changes 5-7) justified, effective and consistent with national policy?

L If the JCS is unsound in relation to accommodation for gypsies and travellers, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

**Matter 3 Strategy and locations for major growth in the NPA (policies 9 and 10, and Appendix 5), including consideration of related access & transportation issues (policy 6) and other infrastructure issues**

**Part A - Overall distribution of growth**

A1 Are the absolute and comparative quantities of growth distributed to the main locations the most appropriate and are they founded on a robust and credible evidence base?

A2 Is this pattern of development deliverable in infrastructure and market terms?

A3 What flexibility exists within the overall strategy to accelerate/defer development in particular locations if circumstances make this necessary? Is the JCS sufficiently clear on this point and how such flexibility would be achieved?

A4 What is meant in practice by para 6.17 (under the heading 'key dependencies') *'There must be a clear commitment to fund and implement key infrastructure as identified in the policy before land is released for major growth'*. Does the JCS clearly identify such key dependencies in respect of each growth location, or effectively identify the mechanism(s) through which such dependencies will be identified?

A5 Is the aim of the 3<sup>rd</sup> bullet point of policy 10 to convey the objective of 'integrating well with neighbouring areas while also contributing to a higher level of self containment for the host town/community'?

A6 To demonstrate compatibility with the Community Infrastructure Levy Regulations 2010, should the second sentence of policy 10 read something to the effect that "Development will achieve the highest standards of design and provide for the necessary infrastructure and services which it generates in accordance with the Community Infrastructure Levy Regulations 2010. Some of these improvements may bring knock-on improvements to existing communities."

**Part B Old Catton/Sprowston/Rackheath/Thorpe St Andrew growth triangle (part policy 10 and appendix 5)**

**Procedure**

B1 In principle (aside from any comments about its content), do policy 10 and appendix 5 (as amended by GNDP Focused Changes 8-10, including the

concept statement) provide a sound procedural basis for the strategic allocation of the growth triangle and an appropriate level of guidance for taking its development forward in a coordinated way without an AAP through future detailed master planning of the various 'quarters'?

### Soundness of the proposal

B2 Is this strategic allocation justified, effective and consistent with national policy?

B3 Does the amended concept statement provide sound guidance for the development? Are the content and objectives of the two maps in the concept statement effectively communicated, or does the key need to include further explanation of the 'areas of green space' and the 'constraints and opportunities for new development'?

### Transport issues related to the growth triangle

B4 Is the Northern Distributor Road (NDR) justified and effective as the means of providing the 'necessary access to key strategic employment and growth locations' and releasing road capacity to achieve 'significant improvement to public transport, walking and cycling in Norwich', and particularly North Norwich (JCS para 5.44)?

B5 The NATS implementation diagram at p61 provides a proposed pattern of public transport interchanges, bus rapid transit corridors, core bus routes, park and ride sites, and key cycle corridors. In relation to the growth triangle: (1) What degree of public transport use/modal shift is aimed for? (2) What is the programme for completing the constituent elements of NATS? (3) Is there reasonable prospect of these being implemented within a timescale in step with new development, or would the NDR tend to generate more car dependency? (4) Is the relative remoteness of the ecotown from current transport infrastructure likely to militate against high public transport usage? (5) Would an effective JCS set minimum threshold levels of public transport accessibility, allied to the progress of development?

B6 In view of the importance seemingly ascribed to the proposed ecotown's proximity to rail services at the time of its selection as such, is there any realistic prospect of significant improvement to the low level of service and the limited number of destinations currently available on the Norwich-Cromer line, or its transformation into some other form of more attractive public transport facility?

## Implementation issues associated with the triangle

B7 If the NDR is fundamental to the delivery of the JCS [para 5.44], are the resources likely to be in place to achieve it, and when? [The answer to this question may or may not become clearer after the October budget after which, if it is budgeted, an inquiry into the Postwick Hub will be required.] What would be the consequences of a possibly unknown length of delay in provision of the NDR? Does the JCS have flexibility in this respect, bearing in mind that JCS policy 10 states that 'Delivery (of the growth triangle) is dependent on the implementation of the Northern Distributor Road (NDR)'?

B8 Paragraphs 44-48 of the Concept Statement at Appendix 5 (Focussed Change FC10) confirm that there can be no commitment to large-scale development in the growth triangle but assess that some 2200 dwellings (which appear to represent existing permissions and allocations [?] – see para 47) may be acceptably developed subject to 'interim improvements for other modes' and 'knowledge that the Postwick Hub improvement will be delivered and the NDR is committed'. In addition, it is suggested that a further 1000 dwellings may be built at the Eco-town. [By reference to the annual build figures for the various growth locations on p111 of the JCS, this means that the eco-town could progress to the stage expected of it by mid 2014-15 and the rest of the growth area to the stage expected of it by as late as mid 2021/22.] Question - Are these 'sound' limits/expectations, or should growth be more or less constrained in the absence of firm commitment to/funding of a start to the NDR?

B9 What are the other critical infrastructure dependencies of the eco-town and the other component parts of the triangle? Are these parts divisible/indivisible in terms of these dependencies?

### Other issue

B10 If the JCS is unsound in relation to the growth triangle, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

## **Part C Other major growth locations in policy 10**

Wymondham (see also matter K concerning public transport in the A11 corridor)

A Does the JCS make clear, justified & effective growth proposals for the town?

B What are Wymondham's critical infrastructure dependencies and can growth there take place within the timescale set out on p111 of the JCS?

C If the JCS is unsound in relation to Wymondham, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

Hethersett (see also matter K concerning public transport in the A11 corridor)

D Does the JCS make clear, justified and effective growth proposals for Hethersett? Is it allocated more growth than suggested by its position as a 'key service centre' in the identified hierarchy of centres (see policies 14 and 19)?

E What are the critical infrastructure dependencies for this location and can delivery of growth take place within the timescale set out on p111 of the JCS?

F If the JCS is unsound in relation to Hethersett, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

Cringleford (see also matter K concerning public transport in the A11 corridor)

G Does the JCS make clear, justified and effective growth proposals for Cringleford?

H What are the critical infrastructure dependencies for this location and can the growth take place within the timescale set out on p111 of the JCS?

J If the JCS is unsound in relation to Cringleford, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

#### Public transport in the A11 corridor

Comments: The NATS implementation plan at p61 of the JCS indicates a proposed bus rapid transit corridor running through Norwich-Cringleford-Hethersett-Wymondham. However, the summary findings of the Sustainability Appraisal state that the strategy for major expansion of a number of existing communities in South Norfolk places '*increased difficulty of achieving a degree of self-containment and providing attractive public transport options that encourage people to use their cars less*'. It observes that growth in the A11 corridor is focussed on areas '*where there should be potential to connect to Norwich via a bus rapid transit service, although it is difficult to be completely certain about deliverability/financial viability at this stage*'. Para 2.257 of the SA states that none of the growth areas under the South Norfolk distribution are of sufficient size to support a turn-up-and-go bus service in 2021, and para 2.2.59 says that the

proposal for 4,400 dwellings on the corridor is 'at the borderline' of providing a potential market sufficient in size to support the development of bus rapid transit.

K In the light of the comments above, can these growth locations effectively support objective 7 on p27 of the JCS (enhancing transport provision to meet the needs of existing and future populations while reducing travel need and impact)? Is there a clear and convincing strategy to ensure that adequate bus provision will be made in line with housing growth at a stage sufficiently early to influence travel patterns? What are the expected timetables and funding sources for achieving the NATS public transport proposals for the corridor and are these likely to be delivered?

### Long Stratton

L Does the JCS make clear, justified and effective growth proposals for Long Stratton bearing in mind its poor assessed performance in sustainability appraisals undertaken since 2007?

M Is the town allocated more growth than suggested by its position as a 'key service centre' in the identified hierarchy of centres (see policies 14 and 19)?

Comments: The Sustainability Appraisal of the submitted JCS (like those undertaken at all previous stages of its evolution since 2007) identifies Long Stratton as being '*less suited to encouraging more sustainable patterns of travel... (as it is)... geographically isolated from Norwich and major employment locations in comparison with the other major growth locations and... there is little potential to deliver public transport improvements that will have a realistic chance of encouraging people out of their cars*'. It concludes that this is '*undoubtedly a significant negative effect of the strategy and probably the major issue that has been highlighted through this SA*'. Despite this the SA states that the scale of the 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 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*'.

N In the light of the above comments, is the retention of the growth/bypass proposal sound? Is there convincing evidence to conclude that the required culture change from car-borne transport to more sustainable modes could be achieved? How would this be done? [The JCS is silent on this point.]

O What are the critical infrastructure dependencies for this location and can its delivery take place within the timescale set out on p111 of the JCS?

P If the JCS is unsound in relation to Long Stratton, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

Easton/Costessey

Q Does the JCS make clear, justified and effective growth proposals for this location? Can growth here take place in the form of an appropriate urban extension keyed into effective public transport connections?

R What are the critical infrastructure dependencies of this location and can its delivery take place within the timescale set out on p111 of the JCS?

S If the JCS is unsound in relation to Easton/Costessey, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]



**Matter 4 Infrastructure delivery (the JCS generally and policy 20 & Appendices 7 & 8 in particular)**

A Is the JCS effective in what it conveys about the infrastructure necessary for its successful implementation and when and by which agencies this will be delivered? Does the Implementation Framework at Appendix 7 adequately identify the fundamentally essential infrastructure items without which its major component elements (eg the major growth locations) cannot progress? Are all 80 items in Appendix 7 equally 'critical', or would some be more appropriately styled 'desirable' or 'aspirational'? If so, which?

B Do any infrastructure items represent 'showstoppers' which, if not completed by a certain date, would prevent implementation of particular key aspects of the JCS? Does the JCS appropriately identify them, and the consequences of their non-delivery?

C Is there evidence of agreement by providers that there is a reasonable prospect of the required infrastructure being completed by the critical dates?

*[Understanding of the above matters A-C may be assisted by the Integrated Development Programme being drawn up by GNDP and by the critical path diagrams promised at the Exploratory Meeting to illustrate the degree of fit between the expected delivery times of the housing proposed at the various growth locations at p111 of the JCS and the reasonable prospect of phased completion of the critical infrastructure items, as agreed by providers.]*

D Is the JCS flexible? Does it indicate any actions that may need to be triggered by contingencies, such as failure to achieve timely provision of necessary infrastructure?

E Are policy 20 and p10 of the JCS clear and effective on the issue of implementation, including the role of GNDP as a delivery agency?

**Matter 5 'Other issues' concerning Access and Transportation (part policy 6)**

*[Most of the transport-related issues concerning the growth triangle are covered under matter 3, as are bus-related issues concerning the South Norfolk growth locations]*

A Is the JCS policy for access and transportation, principally the Norwich Area Transportation Strategy (NATS) justified, effective and consistent with national policy as reflected in objective 7 of the JCS (ie, enhancing transport provision to meet the needs of existing and future populations, while reducing travel need and impact)?

B The NDR aside, what evidence is available to give confidence about the planned completion dates of the other 'strategic improvements' and 'supported improvements' said to be necessary to deliver growth and facilitate modal shift [paras 5.46 & 47]

C If the JCS is unsound in relation to aspects of access and transportation, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

**Matter 6 Norwich City Centre (policy 11) and the Remainder of the Norwich Urban Area, including the fringe parishes (policy 12)**

A Does the JCS provide clear, justified and effective core strategic guidance for the future planning of the City Centre, consistent with national policy?

B Does the JCS provide adequate explanation of/ justification for the proposed changes to the Proposals Map concerning Brazengate Shopping Area and Riverside Shopping Area?

C Does the JCS policy 12 provide sound core strategic guidance for the future planning of the the remainder of the Norwich Urban area, including the fringe parishes?

D If the JCS is unsound in relation to the City Centre and/or the Urban Parishes, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

**Matter 7 Main towns, except Wymondham (policy 13)**

Aylsham, Diss and Harleston

A Does the JCS provide sound core strategic guidance for the future planning of these towns, in particular the proposed Area Action Plan at Diss? Would the proposed levels of growth meet the demographic needs of the individual towns and maintain their comparative competitive positions in relation to nearby towns?

B If the JCS is unsound in relation to any of these matters, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

**Matter 8 Sustainability, environment and design (subject matter of JCS policies 1, 2 and 3)**

Policy 1:

A Is this justified, effective and consistent with national policy?

B Is the concept of green infrastructure adequately explained and integrated into the JCS? Does policy 1 provide an effective, sharply-focussed strategic brief on the purpose and deliverability of green infrastructure? Does it adequately specify the need for identified future DPDs to define the specific boundaries of strategic green corridors and include policies for the management of green infrastructure?

C Is the right hand column of policy 1 fully reflective of the tests posed PPS9 in respect of different types of protected areas? In addition, what is the logic of referring only to 'European' protected species, as opposed to other protection lists (eg species protected under the Wildlife and Countryside Act)?

D [to note that GNDP has accepted that the key to the diagram on p35 is incomplete in that (i) certain colour shadings are unexplained, (ii) the phrase 'Green Infrastructure Opportunities' is seemingly incomplete, (iii) there is no mention of its indicative nature]

Policy 2:

E Is this justified, effective and consistent with national policy?

Policy 3:

F Is this justified, soundly-based, effective and consistent with national policy? In particular:

F1 [bullet 1] Is it a reasonable planning requirement to link a development permanently into a particular 'dedicated, contractually linked decentralised and renewable or low carbon source'? How would this be monitored and enforced? What is the 'low carbon infrastructure fund', how is this 'justified' and how will it work? [see also 5.18]

F2 [bullet 2] Is the GNDP carbon offset fund a 'justified' concept and can it be implemented effectively? [see also 5.18]

F3 [bullets 3&4] Is this policy material justified, effective, and consistent with national policy in PPS supplement para 11 (re the need for Local

Planning Authorities to adhere to the principle of not duplicating controls under planning and other regulatory regimes) and paras 31/32 (re the possibility of there being situations in which it 'could' be appropriate to anticipate levels of building sustainability in advance of national standards and, in such cases, demonstrating clearly 'the local circumstances that warrant and allow this' and focusing 'on development area or site specific opportunities')? What is the justification for departing from the national programme for strengthening the Building Regulations? Is the Greater Norwich Sustainable Energy Study sufficiently sound and convincingly based to support the mandatory approach set out in policy 3?

F4 [re 5.16 – last sentence] Would it be compliant with the tests in Circular 05/05 (and now Reg 122 of the CIL Regulations in respect of S106 agreements) to require new developments to contribute funds for improving the energy efficiency of existing houses?

F5 [re 'Provision will be made for the strategic enhancement of the electricity and gas supply networks to support housing and employment growth. This will include major investment in existing electricity substations in central Norwich and to the east of Norwich'.] Do the providers agree that this investment is likely to be completed in time to support any development contingent upon it? Has such contingent development been identified? What is it?

F6 [re necessary water infrastructure referred to in policy 3 and paras 5.19 to 5.23.] Do the providers agree that this investment is likely to be completed in time to support any development contingent upon it? Has such contingent development been identified? What is it?

F7 [re water efficiency] Does the standard sought in policy 20 imply a requirement in advance of national standards? Is this justified and deliverable? [See also 5.22]

## **Matter 9      The economy (policy 5)**

A      Is the JCS sound in respect of the core strategic guidance provided to other Local Development Documents in terms of its assumptions about the necessary number of jobs to plan for, the spatial provision for land for economic development (including the strategic employment locations identified in policy 9), clusters, town centres, tourism and the 'flagship food and farming hub'?

B      If the JCS is unsound in relation to any of the above matters, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

**Matter 10 Key service centres, Service Villages, and Smaller Rural Communities (policies 14-16)**

Key service centres (policy 14):

A Does the JCS provide sound core strategic guidance for the future planning of these settlements? Does the evidence demonstrate that the key service centres are appropriately listed as such, with no additions/deletions?

B Is the scale of the development for the individual villages soundly based?

The service villages (policy 15):

C Does the JCS provide sound core strategic guidance for the future planning of these settlements? Does the evidence demonstrate that the service villages are appropriately listed as such, with no additions/deletions?

D Is the scale of development for the individual villages soundly based?

Other villages (policy 16):

E Does the JCS provide sound core strategic advice for the future planning of these villages? Does the evidence demonstrate that the 'other villages' are appropriately listed as such, with no additions/deletions?

Allowance for development on 'smaller sites in the NPA' (policies 9 and 14-16):

F Does the JCS make clear what mechanism(s) will be used for resolving whether or not '*additional development*' is necessary at any of the key service centres, service villages or other villages in order '*to deliver the "smaller sites in the NPA" allowance*'? To be effective on this point, should the JCS be clearer/more specific about this? What would it need to say?

G If the JCS is unsound in relation to any of the above matters, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]