Dearest Mrs Feeney

BROADLAND DISTRICT COUNCIL GROWTH TRIANGLE AREA ACTION PLAN – RESPONSE TO INSPECTORS INITIAL QUESTIONS


For the avoidance of doubt, included with the response are 5 appendices:

- Appendix A – Growth Triangle Area Action Plan Submission including Potential Main Modifications and Proposed Additional Modifications as Track Changes, pursuant to question 2.
- Appendix B – GNDP paper on housing in response to the Inspector’s letter, May 2013
- Appendix C – Greater Norwich Infrastructure Plan (GNIP), March 2015
- Appendix D – Omission Sites Maps, pursuant to question 51.
- Appendix E – Copy of Planning Application Decision Notice and Site Plan relating to omission site Moorsticks

A separate response to the Inspectors question dated 24 March 2015, relating to the recently added paragraph to the Planning Practice Guidance (Reference ID: 12-006-20150320) was sent on 1 April 2015.

I hope that you find this response in order and that the Inspector will now have the confidence to progress to examination.

Should you have any further questions then please do not hesitate to contact me.

Yours sincerely

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Date 10 April 2015

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Dear Mrs Feeney
Modifications

2. I note that the Council has suggested modifications to the AAP in response to some representations. It would be helpful if suggested modifications are submitted as a composite document and shown in a tracked changes version of the AAP. This will potentially avoid the need to hold hearing sessions on some matters.

The Growth Triangle Area Action Plan schedule of proposed modifications [Document Ref: GTC07] provides a composite list of proposed modifications. In addition, a composite version of the Growth Triangle Area Action Plan Submission, including proposed Additional Modifications and Potential Main Modifications as tracked changes, is included as appendix A to this response.

Plan period

3. The AAP does not set a clear plan period. ‘By 2026’ is referred to in the Issues and Challenges, but the Vision states ‘By 2034’.

The plan period of the Growth Triangle Area Action Plan Submission [Document Ref: GTC01] ends in 2026. This is consistent with the end date of the Joint Core Strategy (JCS) [Document Ref B106]. The date of 2034 specified in the Vision reflects the forecast date for the completion of all specific sites and allocations identified within the plan. It was not intended that this should be construed as the plan period.

The response to question 4 addresses the justification for the plan period.

4. If the Plan period for the submitted AAP runs to 2026, as per the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS), and assuming it is adopted in 2015 the effective lifespan will be 11 years. The National Planning Policy Framework (the Framework), prefers a 15 year plan period and the Planning Practice Guidance (Guidance) states that ‘Local Plans can pass the test of soundness where local planning authorities have not been able to identify sites or broad locations for growth in years 11-15.’1 What is the justification for a plan period of less than 15 years? Should there be a commitment in the AAP to an early review?

The Local Plan for Broadland comprises the adopted Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk [Document Ref B106], together with the proposed Site Allocations, Development Management, and Growth Triangle DPDs. The JCS runs from 2008 to 2026. As set out in Part 4, section 8(4) of the Town and County Planning (Local Planning) (England) Regulations 2012 [Document Ref A23] it is necessary for the subsequent development plan documents to be consistent with adopted development plan.

As is shown in the Housing Trajectory shown on page 89 of the Growth Triangle Area Action Plan (AAP) Submission [Document Ref: GTC01], the Growth Triangle housing requirements to 2026 are being more than met, through the site specific policies and proposed allocations within the AAP. Together with the allocations and specific policies of the proposed Site Allocations DPD the housing requirement for the Broadland Norwich Policy Area is also being more than met.
The housing requirement in the Greater Norwich area beyond 2026 is not yet known. However, Policy 9: Strategy for Growth in the Norwich Policy Area, refers to the housing requirement in the Growth Triangle as: “7,000 dwellings by 2026 continuing to grow to around 10,000 dwellings eventually”; that is, a further 3,000 dwellings post 2026.

Policy 4 Housing Delivery in the JCS includes a table that shows the housing provision to 2026 to be made for the 3 districts. This illustrates that in the 18 year period from 2008 to 2026 the housing provision expected in the Broadland part of the NPA equates to 617 homes per year. Therefore, if one assumes the same level of requirement, for the four years beyond 2026 necessary to give a 15 year supply this equates to 2468 homes in the Broadland NPA.

The submitted AAP makes provision for an estimated 10,883 homes. In addition, the Site Allocations DPD makes provision for 2365 – 2565 homes in the Norwich Policy Area, exceeding the JCS requirement of 2000 homes. Therefore, in the Broadland NPA provision is made for between 4,248 and 4,448 homes above the JCS requirement to 2026. This is equivalent to approximately 7 years additional housing supply at 617 homes per year.

Therefore, although the AAP has an end-date of 2026, adequate housing provision has been made for at least a 15 year period in accordance with the NPPF.

The proposed approach of the Council in regards to reviewing the Local Plan is set out in a proposed Main Modification to the Site Allocations DPD Proposed modification MM3, this is addressed in detail in the answer to question 28.

**General comments**

5. The allocations in the AAP are designed to meet the requirements of the JCS, which was adopted in 2011 and amended in January 2014 following a successful High Court challenge. It is not clear whether the evidence to support the levels of growth, in the AAP area, as set out in the JCS were updated in 2014. If not, is the evidence for the allocations set out in this AAP still up to date/relevant?

The Joint Core Strategy (JCS) [Document Ref B106] is supported by a comprehensive, credible and robust evidence base.

The examination of the part JCS in 2013 tested whether the plan was soundly based, fully justified and supported by an up-to-date, credible and robust evidence base. In testing the JCS the Inspector had regard to a bespoke Sustainability Appraisal and supporting appendices, updated evidence on objectively assessed housing need, updated evidence on housing delivery and new evidence demonstrating the viability of the proposed development, along with the pre-existing evidence base supporting the plan.

On this basis the Inspector concluded in his report of November 2013 [Document Ref: B103] that, subject to main modifications, the “Joint Core Strategy for Broadland, Norwich and South Norfolk, the Broadland Part of the Norwich Policy Area Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.
Therefore it is without doubt that, in the considered opinion of the Planning Inspectorate, the proportionate evidence base submitted to support the examination of the part JCS, and which supported the level of growth in the AAP area was up-to-date, credible and robust. As set out in Part 4, section 8(4) of the Town and County Planning (Local Planning) (England) Regulations 2012 [Document Ref A23] the AAP, must be consistent with the JCS and therefore the evidence base is relevant.

Where appropriate additional evidence has been produced to support the AAP, this includes: a Sustainability Appraisal [Document Refs: GTC02, GTC03 & GTC04]; a Habitat Regulations Assessment [Document Ref: GTC07]; the Broadland Viability Study [Document Ref: B73]; An appraisal of submitted documents relating to the Thorpe Woodlands from Social Conscious Capital [Document Ref:GTB34]; the Growth Triangle Area Action Plan Transport Issues background Note [Document Ref: GTB38]; the North East Water Cycle Study [Document Ref: GTB33]; a Strategic Housing Land Availability Update [Document Ref: GTB49] and, additional statements on Housing Delivery, Form of Development, Green Infrastructure and Transport [Document Ref: GTB43, GTB47, GTB48 & GTB51]. The Council considers this to be a credible and robust evidence base supporting the Policies of the AAP.

6. The AAP makes reference to the Greater Norwich City Deal in various places. What is this and what are its implications for the Plan? What is its status?

The City Deals initiative was established to create more business and employment opportunities to grow the economy. City Deals themselves are agreements between government and a city that give the city control to: take charge and responsibility of decisions that affect their area; do what they think is best to help business grow; create economic growth; and, decide how public money should be spent.

The Greater Norwich City Deal [Document Ref: B66], signed with government in December 2013, aims to bring an additional 13,000 jobs across the Greater Norwich area above the JCS target and accelerate the delivery of the 3,000 homes planned within the Growth Triangle beyond the end of the JCS plan period.

There are three strands to the City Deal: Enterprise, Skills and Infrastructure. As part of the deal, the government announced £3.9m of funding for the LEP-wide enterprise and innovation element, while the ‘skills for growth’ aspect, worth £4m, was secured in October 2013. The infrastructure element of the deal secures the final piece in the jigsaw of recent funding announcements by allowing partners access to an additional £43m from the Public Works Loan Board (PWLB) at a specially discounted rate, on top of the £37m already agreed.

Upfront funding for onsite infrastructure is seen as one of the biggest barriers to the creation of new jobs and homes. Through the establishment of a Local Infrastructure Fund City Deal partners are able to borrow up to £20m from the PWLB at a discounted rate and to use this to provide loans to developers for site specific help to enable housing sites to be delivered quickly.

The outcome of the City Deal will not only help Greater Norwich meet its planned growth but will also serve as a catalyst for the delivery of the additional jobs in the area and the early delivery of planned homes.
### Sustainability Appraisal

#### 7. CD GTC4 front cover says it is the technical appendix 2014, but this appears to have been put on the technical appendix from 2009. Has it been updated since 2009? If not, why not and what are the implications?

Only appendix A of the Growth Triangle AAP Technical Appendix [Document Ref: GTC04] is dated 2009. Appendix A is the Sustainability Appraisal Scoping Report produced in 2009, following the necessary consultation with the prescribed environmental bodies and other stakeholders.

The appendices B to I were all produced as part of the Sustainability Appraisal for the pre-submission publication of the Area Action Plan (AAP) in 2014. In addition, Appendix H provides a clearly labelled update following consideration of comments on the SA resulting from the pre-submission publication.

#### 8. There are a number of conclusions in the SA report that find only neutral or zero effects from proposed policies, where this seems unusual. Policy GT3 (Transport) includes the provision of a new orbital road link that would cross a green infrastructure corridor protected by Policy GT2, but the SA report states that GT3 has no relationship with ENV4 (Maintaining and Enhancing Biodiversity) and that the effects are therefore neutral. In relation to ENV4 (Air Quality) - the possible effects of GT3 and the proposed road in relation to air quality are treated as unknown and marked n/a. Does the reasoning for these conclusions stand up and is the SA therefore robust?

As set out in section 7, page 61, of the Sustainability Appraisal Main Report [Document GTC02], the appraisal considers the effect of the plan on the baseline/likely future baseline, as set out in section 4, pages 38-41. As set out in paragraph 7.30 on page 32 of the Growth Triangle Area Action Plan Submission [Document Ref: GTC01] planning permission already exists for the road links between Broadland Business Park and Plumstead Road, Wroxham Road and Salhouse Road and there is a resolution to grant planning permission for road links between Wroxham Road and St Faiths Road. These road links relate to the sites identified in AAP Policies GT5, GT6, GT9 and GT12. Consequently the road links form part of the baseline of the plan and which are likely to be delivered irrespective of the adoption of the AAP. Therefore it is considered reasonable to conclude that the effect of Policy GT3 in safeguarding these road links has no greater than a neutral effect on the baseline in regards to ENV4 as it simply preserves the existing situation.

As set out in the scoring system, which can be found amongst other incidences, on page 246 of Sustainability Appraisal Technical Appendix G, the annotation “n/a” indicates no significant effect. In regards to GT3, the JCS already establishes the acceptability of substantial development in the Growth Triangle, and those effects have already been taken into account at that level of the plan making process. As set out in paragraph 7.5 of the Sustainability Appraisal Main Report, this approach is consistent with clause 12(3) (a) of SI 2004 No. 1633 The Environmental Assessment of Plans and Programmes Regulations 2004 [Document Ref: A16] which states that environmental report should take account of the extent to which certain matters are more appropriately assessed at different levels in order to avoid duplication of the assessment.
The effect of the plan when taken as a whole in regards to ENV3 is set out in Table 10 in section 9 of the Sustainability Appraisal Main Report, page 85. The assessment concludes that the AAP would have no significant effect on the baseline because there are a number of specific policy interventions within the AAP which seek to minimise the need to travel and maximise opportunities to use public transport, walking and cycling. The judgement was taken in the knowledge that the AAP baseline includes JCS Growth and that the JCS Sustainability Appraisal, December 2012 [Document Ref: B92], in table 6.2 concluded that JCS Growth in NE Norwich would likely have no significant effect on the baseline.

**Rackheath Low Carbon Community**

9. The Government have recently cancelled PPS1 eco-towns supplement. What are the implications of this for the AAP and in particular Rackheath?

As set out in section 4 of the Sustainability Appraisal (SA) Report for the Part Joint Core Strategy (JCS) [Document Ref: B92], identified three reasonable alternatives for the distribution of development: Alternative one - growth focused in NE Norwich inside and outside the NDR; Alternative two - growth focused in NE Norwich, inside the line of the NDR only; and, Alternative three – growth focused in SW with the balance distributed in the NE and NW parts of the Broadland NPA.

For the reasons set out in table 6.1, pages 62 to 78, of the SA Report for the Part JCS, alternative one was considered to be the most sustainable when considered against the other reasonable alternatives. It was on this basis that the JCS policy and policy map showing the extent of the Growth Triangle was submitted for examination.

Within the context of the Growth Triangle AAP Proposed Submission Document [Document Ref: GTC01], the suitability of the site north of Rackheath village, that of the proposed eco-community, was considered in Technical Appendix D of the Growth Triangle Sustainability Appraisal [Document Ref: GTC04]. Whilst this clearly references the aspirations set out in the eco-community concept statement, it also illustrates why the site in terms of its location, scale and potential for high quality development is a reasonable alternative for the purposes of the AAP.

Paragraph 5.6, page 267, of the Technical Appendix H of the Growth Triangle Sustainability Appraisal explains the rationale for the reduction in the overall scale of development at Rackheath within the AAP. The ongoing sustainability of a reduced allocation at Rackheath is shown by the relevant table in Technical Appendix I, pages 447 to 461 and the overall assessment of the sustainability of the plan, which can be found in table 10, page 82 to 103 of the Growth Triangle AAP Sustainability Appraisal Main Report [Document Ref: GTC02].

Therefore, it is considered that irrespective of the cancellation of Planning Policy Statement: eco-towns – A supplement to Planning Policy Statement 1 [Document Ref: A27], the proposed allocation for major development north of Rackheath Village remains justified.

In regards to the specific standards set out within the PPS supplement, it is clear that the Council would no longer be able to expect a number of the specific standards as
set out in the supplement. These standards would include: zero net carbon emissions from all buildings (ET7); the specific requirements for homes standards (ET9 (a), (b), (c) and (f)); modal share (ET11.2 (a)); and, a net overall gain in local biodiversity (ET16.1).

However, a great many of the general principles and some of the standards relating to the form, nature and operation of the development are maintained through either the adopted policies of the JCS and/or the emerging policies of the AAP.

This would include, amongst other things, a higher requirement for affordable homes, 33% as required by JCS Policy 4 as compared with the 30% required by ET9(d); easy access to employment by walking, cycling and public transport (ET11) through adopted JCS Policies 6 and 10 and emerging AAP policy GT3; supporting healthy and sustainable environments (ET12) through adopted JCS policies 7 and 10 and emerging policies GT1, GT2 and GT3 of the AAP; provision of local services (ET13) through Policy GT16 of the AAP; and, the provision of significant green infrastructure through emerging policies EN3 and RL1 of the emerging Development Management DPD and Policy GT2 of the emerging AAP.

Therefore, it is considered that whilst some specific building standards and requirements could no longer be applied the existing and emerging policies of the Broadland Local Plan provide a robust and credible policy framework which will ensure high quality development.

The only necessary changes therefore are considered to relate to ensuring that the cancelled status of the PPS supplement on Eco-towns is reflected appropriately within the AAP. These are considered to be Additional Modifications which could be appropriately addressed through an amended schedule of modifications if necessary.

**Housing**

10. Paragraphs 4.3 – 4.4 of the AAP refer to the aims of the Greater Norwich City Deal (i.e. 10,000 dwellings by 2026, rather than the 7,000 required by the Joint Core Strategy (JCS)). To what extent should the GNCD be influencing the Council’s approach to bringing forward housing sites?

Paragraph 4.3 identifies the issue that the Greater Norwich City Deal [Document Ref: B66] has an ambition of accelerating planned growth within the Growth Triangle. The challenge to the AAP relating to this issue is identified in paragraph 4.4 which is to provide the conditions within which 10,000 homes can be delivered by 2026. This is not however a requirement of the AAP.

The approach to the allocation of housing sites within the Growth Triangle Area Action Plan (AAP) Submission [Document Ref: GTC01] is wholly consistent with addressing this challenge. Through the mechanisms enabled through the Greater Norwich City Deal [Document Ref: B66]: Targeted enterprise and innovation initiatives; Investment in strategic infrastructure; and, a LEP wide skills programme, the city deal will create the conditions within which growth in jobs and homes can be accelerated to meet its ambitions.
However, the ambition of the City Deal should not be conflated with the national policy requirement as set out within paragraph 156 of the National Planning Policy Framework (NPPF) [Document Ref: A30] to deliver the homes needed in the area. Paragraph 5.22 of the Joint Core Strategy (JCS) [Document Ref B106], page 42 and relating to Policy 4, is explicit that in order to address local housing need allocations for a minimum of 21,000 homes are required within the Norwich Policy Area (NPA), to be delivered by 2026. As shown in the table on page 43 of the JCS, this equates to an allocation requirement of 9,000 homes within the Broadland NPA. As set out in Policy 9 of the JCS, page 56, this equates to allocations for 7,000 new homes by 2026 in the Growth Triangle and a further 2,000 across the remainder of the Broadland NPA.

As shown in the housing trajectory, page 89 of the AAP, the allocations and specific policies of the plan are forecast to more than meet this housing need.

11. In any event, the housing trajectory does not indicate that there is a likelihood of satisfying the GNCD’s ambitions in this respect. Also, policy 10 of the JCS refers to ‘rising to a total of at least 10,000 after 2026’. What is the timescale for the additional 3,000, given that the AAP is seeking to allocate sufficient housing to meet this requirement?

The housing trajectory, page 89 of the Growth Triangle Area Action Plan Submission [Document Ref: GTC01], illustrates the forecast delivery of allocated sites within the Growth Triangle based on a reasonable set of assumptions as set out in the Statement on Housing Delivery [Document Ref: GTB43]. For the reasons set out in the answer to question 10, the City Deal has the potential to create the conditions that will significantly accelerate this rate of delivery.

The additional 3,000 homes planned for the Growth Triangle post 2026 are required to provide sufficient critical mass to support the long term viability of the new secondary school, rather than to meet an identified need for new homes. The rationale supporting this threshold is set out in paragraph 3.1, page 254, of Technical Appendix K to the Sustainability Appraisal for the Part Joint Core Strategy [Document Ref: B94]. Consequently the JCS establishes no end date for delivery of these homes. However, based on the assumptions set out in the Statement on Housing Delivery it is forecast that the final completions on the Site Specific Policies and Allocation of the AAP will be 2034.

12. Paragraph 4.2 of the AAP refers to a requirement for 1400 dwellings hanging over from before the JCS start date. Were they not absorbed into the overall need figure at that point, assuming they remain unbuilt? How do they relate to those allocated in this Plan, are they commitments? Is it effective to have a separate requirement hanging around that is ‘planned for’ outside the JCS and the AAP.

Policy 4 of the Joint Core Strategy (JCS) [Document Ref B106], page 42, sets out the minimum requirements for new homes in Broadland. The explanatory table on page 43 of the JCS shows that for the Broadland Norwich Policy Area (NPA) the requirement is the delivery of 2,099 homes which are part of the pre-2008 commitment and 9,000 homes through new allocations. As set out in Policy 9 of the JCS, page 56, this equates to allocations for 7,000 new homes by 2026 in the
Growth Triangle and a further 2,000 across the remainder of the Broadland NPA.

Policies GT4: Home Farm and GT5: White House Farm of the Growth Triangle Area Action Plan Submission (AAP) [Document Ref: GTC01], pages 34 to 37, are specific policies that relate to the remaining unbuilt JCS baseline commitment within the Growth Triangle i.e. the 1,400. This effectively ensures the ongoing contribution of this commitment to deliver the JCS housing requirements.

The delivery forecast for site GT4: Home Farm and GT5: White House Farm are shown on page 21 of the Statement of Housing Delivery [Document Ref: GTB43] under the references 20070346, SPR4, 20131787, 20080367, 20130209, 20130224, 20130696 and 20130699.

These sites are excluded from the housing trajectory on page 89 of the AAP, as they do not contribute to the JCS Growth Triangle housing requirement as set out in Policy 9 of the JCS, page 56.

13. The Contingency section acknowledges that the Plan cannot proceed without the NDR. The milestones it sets out for expected delivery will have changed already, given that the NDR application has not been decided yet. Alternatives for the supply of housing in the event of delays to the NDR are discussed (para 9.23), but para 9.25 notes that the alternatives are reliant on other infrastructure improvements. This seems to be finely balanced and could easily be upset by infrastructure delays. Has the Council considered the implications for housing numbers if the scheme is delayed or in the worst case scenario, not permitted?

As set out in paragraph 9.19 of the Growth Triangle Area Action Plan (AAP) Submission [Document Ref: GTC01] the contingency section specifically plans for the eventuality, however unlikely, of non-delivery or significant delay to the NDR, not just delays.

The actions to be taken in the event of non-delivery or significant delay to the NDR are set out in 9.26 to 9.28 of the AAP. Specifically that if it becomes apparent that there is no possibility of the timely construction of the NDR, a review of the adopted Joint Core Strategy [Document Ref: B106] proposals for Growth would be triggered. This contingency action was discussed at length during the examinations on the JCS, and with the addition of the requirements of paragraph 7.17 and policy 22, was considered to be a justified and effective approach.

In any event, and as set out in the response to question 28 below, Broadland District Council has committed to a review of the plan in 2015/16, to be completed by 2021. This will necessarily take into account the status of the NDR.

Paragraphs 9.20 to 9.24 set out the number of homes that can be developed in the event of non-delivery or significant delay to the NDR. Specifically, paragraph 9.23 states 4,687 homes can be accommodated ahead of the NDR, 3,308 above the pre-JCS baseline housing commitment. Those sites which are expected to deliver those homes are set out in the table on page 76 of the AAP.
In regards to the infrastructure dependencies of the homes identified in paragraph 9.23, which are set out in paragraph 9.25, construction of Postwick Hub is already well underway, and whilst slightly delayed this does not affect the forecast delivery of any sites reliant upon it as listed in the table on page 76.

The link road between Postwick Hub and Plumstead Road is secured through the grant of planning permission for AAP allocation GT6: Brook Farm and GT9: Broadland Business Park (North). Road details for the discharge of conditions are currently under consideration by Norfolk County Council as Highway Authority and it is the stated intention of the developer to begin construction to enable housing delivery to be begun in 2017/18. Should it become apparent that the road cannot be delivered in a timely manner then the City Deals mechanisms outlined in the answer to question 6 provide the opportunity for the GNGB to intervene to ensure that the programme remains on track.

The other improvements listed under paragraph 9.25 are site specific mitigations required as part of the resolution to grant planning permission for GT12: North Sprowston and Old Catton.

As such there can be a high degree of confidence that the infrastructure listed under paragraph 9.25 will be delivered in a timely manner.

It is correct that the NDR milestones have changed, but not to the extent that it will meaningfully affect the delivery of AAP housing. The updated milestones published by Norfolk County Council are set out below:

- Spring 2014 – Postwick Construction Starts
- Summer 2015 – Determination of NDR Application
- Winter 2015 – NDR Construction Begins
- Winter 2015 – Completion of Postwick Junction Works
- Late 2017 – NDR Opens to Traffic

14. Paragraph 7.18 of the JCS says that ‘development beyond the pre-NDR threshold established through the AAP process will not be possible without a commitment to the NDR’. How has this threshold being established?

Paragraph 9.21 of the Growth Triangle Area Action Plan (AAP) Submission [Document Ref: GTC01] explains that further assessment work has been undertaken since the Joint Core Strategy in order to establish whether an increased level of development, beyond that identified in the JCS, can be accommodated ahead of the NDR.

This work was carried out by Norfolk County Council as highway authority, and included additional traffic modelling using the Production/Attraction based Norwich Area Transport Strategy (NATS) model, which was used to support the NDR, Best and Final Funding Bid in 2009. The Growth Triangle Area Action Plan Transport Issues Background Note [Document Ref: GTB38], explains in detail the work undertaken.
Paragraphs 9.22 to 9.24 of the AAP explain the conclusions of the Growth Triangle Area Action Plan Transport Issues Background Note.

15. Should the annual targets be set out in the AAP?

The Greater Norwich Annual Monitoring Report, the 2012/13 AMR is included as document B105 in the evidence base, already monitors progress against the Joint Core Strategy (JCS) housing trajectory for the Norwich Policy Area (NPA) and Rural Policy Area (RPA). In addition an annual five year land supply statement is produced as part of the Greater Norwich AMR, which includes land supply information for each of the three sub-sections of the NPA.

The Monitoring Framework of the Growth Triangle Area Action Plan (AAP) Submission [Document Ref: GTC01], pages 79 to 84, proposes the monitoring of the commencement of the Specific Sites and Allocations within the AAP. The milestones are consistent with the housing forecasts set out in the AAP housing trajectory found on page 89.

As the housing requirement identified in the JCS relates to the Norwich Policy Area as a whole it seems most appropriate to monitor progress across this geographic area. The relative progress of specific sites and allocations in the AAP is then proposed to be monitored as part of its monitoring framework.

Therefore it is considered unnecessary to add a further level of monitoring on top of the already extensive monitoring of housing trajectories, 5 year land supply and site commencement.

16. The Framework requires the identification of a 5 year supply of deliverable sites with an additional buffer of 5% (i.e. 5.25 years), unless there has been a record of persistent under delivery in which case the buffer should be increased to 20% i.e. 6 years. On the basis of the under delivery evident from the AMR should a 20% buffer be applied?

Within the context of the AAP it is important to note that the National Planning Policy Framework [Document Ref: A30] requires an additional buffer of 5% or 20% moved forward from later in the plan period.

This is important because neither the APP, nor the JCS which preceded it, contain any phasing other than that dictated by the delivery of essential infrastructure. Therefore the plan does not prevent sites coming forward and delivering houses in the 5 year land supply period. Furthermore, as set out within Technical Appendix H of the Sustainability Appraisal [Document Ref: GTC04], the AAP site selection process has proactively preferred those sites which are considered to have the most potential for early delivery.

Clearly, it will be the economic climate and housing market conditions that will ultimately determine whether higher build rates are achievable. The response to question 6 outlines the pro-active interventions of the Greater Norwich Authorities through the Greater Norwich City Deal to stimulate economic growth and housing delivery.
Notwithstanding the above, the GNGB authorities consider that a 5% buffer should be used in the identification of a 5 year housing land supply of deliverable sites. The GNGB’s use of the 5% buffer in calculating land supply has been challenged by those suggesting a 20% buffer. The GNDP provided a paper on housing in response to the Inspector’s letter in May 2013 (Appendix B) on this topic. Appendix 9 of this paper demonstrated that over the past 13 years the NPA has generally delivered a surplus of housing, with shortfalls occurring primarily in recession years. The matter has been clarified in both the part JCS Inspector’s report, see paragraphs 61 – 65 of Part JCS Inspector’s report [Document Ref:B103] and a planning appeal decision, see appendix A, paras 17-20 of Statement on Housing Allocations [Document Ref: B146]. It is clear that, measuring delivery over an appropriate period in the light of economic cycles, there has not been persistent under delivery in the NPA and therefore a 5% buffer should be used.

17. Is it the Council’s intention to make up this shortfall in housing delivery in the first 5 years of the Plan which is the approach preferred by the Guidance, where possible, or over the lifetime of the Plan?

Broadland District Council strongly believes that the housing shortfall should be addressed over the lifetime of the plan.

The justification for this approach is set out in the answer to question 18 below.

18. What is the justification for the approach taken? Has this shortfall being taken into account when allocating sites.

The justification for the Council’s intention to deal with the housing shortfall over the life time of the plan is set out in paragraphs 14 to 19 of the Greater Norwich area five-year supply of housing assessment, which can be found as appendix A to the Greater Norwich Annual Monitoring Report, the 2012/13 AMR [Document Ref: B105]. For convenience this justification is repeated below:

Both locally and nationally there is considerable debate about the appropriate methodology for calculating housing land supply. In particular there is debate about how any backlog is dealt with in the calculation and whether it should be met across the entire remaining plan period.

The JCS was prepared and is to be monitored in accordance with the former approach. This is clearly illustrated in the trajectory contained in appendix 6 of the adopted Joint Core Strategy [Document Ref: B106] and is made explicit in the definition of indicators in appendix 8.

Current government guidance allows for both methodologies to be used and the issue was the subject of debate at the part JCS Examination. On this issue the Inspector agreed with the GNDP that “the shortfall should be added to the housing delivery target over the plan period”, paragraph 66 JCS Inspectors Report [Document Ref: B103].
There is a strong logic to this approach. Having considered all reasonable alternatives in the plan preparation process and determined that an approach involving significant urban extension is the preferred option, it is appropriate to allow for the extensions to be implemented before alternative sites are considered, as failure to do this could undermine investor confidence and the plan-led approach to long-term sustainable development. This issue is particularly significant in view of the extent of the backlog resulting from the prolonged downturn in the property market since 2008, which coincided with a considerable uplift in the level of need recognised in the planning system through the adoption of the RSS.

In terms of how this has influenced the site selection process in the AAP, as set out in Technical Appendix H of the Sustainability Appraisal [Document Ref: GTC04] the AAP site selection process has proactively preferred those sites which are considered to have the most potential for early delivery.

19. Policy GT20 sets out triggers for the release of reserve sites (GT21 & 22), the stated aim of which is to provide flexibility should insufficient housing come forward by 2019/20. However, total allocations shown in the housing trajectory (p89) - 7,274 by 2026 and 10,883 thereafter - do not have much flexibility already. Is there a need for these sites to be reserved? Could they be allocated as over provision to allow flexibility from the start of the Plan? The supporting text seems to suggest that neither site will come forward before 2020 in any event.

As identified in the question, the AAP already over provides in terms of housing by 883 units, or almost 9%. Of these 10,883 dwellings 7,274 are forecast to be delivered by 2026. When considered in combination with the site allocations DPD, which also over provides in terms of housing, delivering between 2365 and 2565 homes by 2026, total expected delivery by 2026 is between 9,639 to 9,839 homes, compared to the JCS allocation requirement for 9,000 new homes by 2026. This is an oversupply of between 6% and 9%, which is considered to be a reasonable and proportionate oversupply to provide flexibility, particularly when it is considered that these figures do not take account of windfall that will inevitably take place over these years.

20. Is the reserve sites policy in the spirit of the Framework?

The core planning principles of the National Planning Policy Framework (NPPF) [Document Ref: A30] state that plans should set out a clear strategy for allocating sufficient land which is suitable for development in their area. It also states that plans should encourage the effective use of land by reusing land that has been previously developed, and that plans should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling.

The answer to question 19 above explains why the allocations of the Growth Triangle AAP Proposed Submission Document [Document Ref: GTC01] and Broadland Site Allocations DPD meet the requirements set out in Policy 9 of the Joint Core Strategy [Document Ref: B106], with sufficient flexibility to adapt to changing or unforeseen circumstances.
It is also considered that significant over allocation of land for housing within the AAP would be inappropriate as it would prejudge matters, specifically the scale and appropriate distribution of development over the period beyond that considered by the Joint Core Strategy [Document Ref: B106]. This may also undermine the delivery of sustainable brownfield sites within Norwich and its built up fringe. This would arguably conflict with the intentions of paragraphs 17 and 111 of the NPPF, which seek to make the best use of brownfield land.

Furthermore, paragraph 151 of the NPPF states that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development.

Table 9, pages 64 to 75 of the Growth Triangle AAP Sustainability Appraisal Main Report [Document Ref: GTC02] compares three strategic options: 1) allocate to meet minimum JCS residential requirements; 2) allocate all to meet minimum JCS residential requirements with reserve sites; and, 3) allocate all suitable sites.

The reasons for the selection of alternative 2 are set out on page 76 and 77 of the Sustainability Appraisal Report. On this basis, it is considered that the approach to the allocation of land for housing in the AAP is the most sustainable when considered against the reasonable alternatives and is therefore consistent with the requirements of paragraph 151 of the NPPF.

21. It is argued by some representors that insufficient land has been allocated to provide a 5 year land supply and a continuous supply of housing throughout the Plan period. Should there be any over allocation to provide flexibility and to help ensure the housing requirement is met?

Sufficient land is allocated in the Growth Triangle AAP Sustainability Appraisal Main Report [Document Ref: GTC02] with flexibility. The AAP sites provide 10,883 homes exceeding the minimum JCS requirement of 10,000 homes. In addition the Broadland Site Allocations DPD will make a significant contribution to the 5 year housing land supply and a continuous supply of housing throughout the plan period. Windfall sites are also likely to increase housing land supply within the NPA.

The contribution to land supply from the combination of existing committed housing sites, AAP sites and Broadland NPA Site Allocation sites is shown in Appendix D to the Statement on Housing Delivery [Document Ref: GTB43]. The managed delivery target row of this table clearly shows that the JCS requirement is forecast to be met by 2024/25 and exceeded thereafter.

Appendix D also shows that with the inclusion of emerging sites, i.e. those identified within the Broadland Site Allocations and Area Action Plan DPDs, that Broadland would exceed the five year land supply requirement.

Furthermore, for the whole NPA, allocations will be provided from Norwich City site allocations, South Norfolk site allocations, Wymondham Area Action Plan, and Long Stratton Area Action Plan. It is considered that these, in combination with the Broadland Site Allocations and Growth Triangle AAP contribute to a continuous supply of housing throughout the plan period in the whole NPA.
The combination of the three Greater Norwich authority's commitments (including emerging sites) towards housing land supply can be seen on the ‘Whole Norwich Policy Area Trajectory’, which can be found as appendix A to the Greater Norwich Annual Monitoring Report, the 2012/13 AMR [Document Ref: B105]. Clearly the ‘Total Delivered’ amount of dwellings exceeds the ‘Total Required’ amount of dwellings, thereby achieving the minimum JCS housing requirements with flexibility.

<table>
<thead>
<tr>
<th>22. Is there a sufficient range of housing sites to provide flexibility?</th>
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The Housing Trajectory set out on page 89 of the Growth Triangle AAP Sustainability Appraisal Main Report [Document Ref: GTC02] illustrates that the specific sites and allocations of the AAP will meet the requirements of the Joint Core Strategy (JCS) [Document Ref: B106].

The forecast in the Housing Trajectory is based on the evidence set out in section 2 of the Statement on Housing Delivery [Document Ref: GTB43], which provides realistic assumptions about annual delivery rates for development sites. The evidence within the Statement on Housing Delivery is consistent with that submitted to the Joint Core Strategy examination in July 2013.

The Inspector in this report into the Joint Core Strategy [Document Ref: B106], dated November 2013, concluded that the JCS housing trajectory, was realistic, balanced, deliverable, justified and soundly based.

Consequently there can be a strong degree of confidence that the range of housing sites identified in the AAP provide sufficient flexibility to meet the requirements as set out in Policy 9 of the JCS.

Also see answer to question 21.

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<tr>
<th>23. Will having lots of large sites increase the risk of not meeting the JCS targets and identified need?</th>
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Policies 9 and 10 of the Joint Core Strategy [Document Ref: B106] identified the Growth Triangle as a location for major new or expanded communities in the Norwich Policy Area (NPA). It is therefore only to be expected that a significant proportion of these major new or expanded communities would be delivered through larger development sites.

However, it is critical that the Growth Triangle is not seen in isolation. The Growth Triangle forms only one part of the strategy for the Norwich Policy Area as set out in Policy 9 of the Joint Core Strategy [Document Ref: B106], which identifies a number of locations for growth, which will provide for a range of different size development sites in order to meet the Norwich Policy Area housing requirements as set out in Policy 4 of the JCS.

Notwithstanding the above, if for the sake of argument the Broadland NPA is considered in isolation, then as set out in the response to comment GTPS130, on page 7 of the Area Action Plan (proposed submission version) Representations Report (regulation 20) [Document Ref: GTC06]:

“the Broadland part of the NPA contains a wide variety of sites for housing, not just large strategic allocations. This provides for significant choice in the market, effectively avoiding an over-reliance on strategic allocations over the short (0-5yrs) and medium (5-10yrs) terms. It is currently estimated that 8% (1,216 dwellings) of all proposed sites will be on sites of 100 or fewer dwellings, 18% (2,831 dwellings) on sites of 250 units or fewer, 25% (3,771 dwellings) on sites of 500 or fewer, and 40% (6,221 dwellings) on sites of 1,000 or fewer”.

Therefore, it is not considered that the expected incidence of larger development sites within the Growth Triangle represents an increased risk of not meeting the JCS targets and identified need.

24. Should the expected numbers of dwellings be included in the individual site allocation policies, rather than just in the trajectory? If not, why not?

Whilst they are reasonable estimates, the dwelling forecasts set out within the housing trajectory, as shown on page 89 of the Growth Triangle Area Action Plan Submission [Document Ref: GTC01] should be considered indicative, not prescriptive.

This is considered to be the most appropriate course of action as it enables the final levels of development on any particular site to be determined through an appropriate masterplanning and design process, taking into account the findings of detailed site specific investigations and the results of consultation on the site specific proposals rather than the contents of an unnecessarily prescriptive allocation policy.

25. Is the housing trajectory overly optimistic? How has it been informed?

The housing trajectory is a reasonable estimation of the likely delivery of sites identified within the AAP. It has been informed by the evidence set out in section 2 of the Statement on Housing Delivery [Document Ref: GTB43].

The evidence within the Statement on Housing Delivery is consistent with the JCS update to Examination Document DV21: Updated Information on Housing Land Supply (Appendix B) that was supplied to the JCS examination and is dated May 2013. Consequently this information is less than 2 years old and therefore is considered to remain up-to-date.

This evidence was considered during the examination of the JCS. In paragraph 54 of the Inspector’s Report on the Examination into the JCS [Documents Ref: B103] the Inspector concludes that this is credible evidence. Furthermore, on Issue 1: Does the Plan make appropriate provision for the effective delivery of the overall amount and location of new housing required, having regard to national policy, and is it soundly based, fully justified and supported by an up-to-date, credible and robust evidence base, paragraph 80, the Inspector concludes that “overall the housing totals and modified Housing Trajectory represents a realistic, balanced, deliverable, justified and soundly based set of figures”.

26. Presumably the rate of delivery (last column) in the table on page 76 of the AAP is dwellings per annum? If so, are the anticipated delivery rates at White House Farm; Brook and Laurel Farm; North Sprowston and Old Catton; and land south of Salhouse Road realistic and achievable? What up to date evidence is there to support these assumptions?

Section 2 of the Statement on Housing Delivery [Document Ref: GTB43] sets out the justification for the annual housing delivery forecasts for the site set out in the table on page 76. Also see answer to question 25.

27. What are the consequences of these rates not being met?

Predictably, lower completion levels than forecast would affect the likelihood that the AAP housing requirements, or that for the Broadland NPA as a whole, could be met. However, it is not considered that there is any compelling reason to believe that the forecast rates are unreasonable.

The rate of delivery is monitored annually as part of the Joint Core Strategy Annual Monitoring Report [Document Ref: B105]. This enables the local authority to understand whether further remedial action is necessary to ensure an ongoing housing land supply. As set out in question 28 below, Broadland has committed to a review of the plan to be begun in 2015/16 and be completed by 2021. This will enable any shortfall to be effectively addressed.

In advance of the completion of the plan review, Broadland would continue to determine applications in accordance with Policy 21 of the Joint Core Strategy (JCS) [Document Ref: B103], page 97.

28. Guidance advises that ‘most Local Plans are likely to require updating in whole or in part at least every five years’ 2. Should this be the approach taken by the Council to ensure that it retains a 5 year supply of deliverable housing land?

The proposed approach of the Council in regards to updating the Local Plan area set out in Site Allocations DPD Proposed modification MM3, which proposes the insertion of a new paragraph which states:

“A review of the Broadland Local Plan is to be commenced in 2015/16 and should be completed by 2021. The review will involve new evidence gathering to understand future needs for development, such as the Strategic Housing Market Assessment, that is currently being produced and that will identify revised housing need figures to 2036. This will include working with other local planning authorities in accordance with the Duty to Cooperate. It is likely that the review will “roll forward” planning for the district to 2036, giving at least a 15 year time horizon from its adoption”.

This paragraph could also be inserted into the AAP if considered necessary.
The Council has considered each site individually, estimating housing yield taking into account the progress of the site through the planning process, any specific evidence available for each site, the outcome of discussions with developers or, in rare instances standard gross density multipliers. The estimates resulting from this evaluation process was considered realistic by the local authority and the specific rationale for each site is set out below:

- **GT4 Home Farm** – Based on extant planning permissions at the time of submission.
- **GT5 White House Farm** – Based on extant planning permissions at the time of submission.
- **GT6 Brook Farm** – Based on extant planning permissions at the time of submission.
- **GT7 Land South of Salhouse Road** – Based upon estimate housing yield set out in the EIA scoping for the site (District Reference: 20140357) received in 26 February 2014.
- **GT8 Land North of Plumstead Road** – Based upon pre-application discussions with landowner.
- **GT 11 Land East of Broadland Business Park** – Informed by masterplan submitted in response to the issues and options consultation and revised through discussions with site promoter and agent (I-Field Estates and Pegasus Planning LLP).
- **GT12 North Sprowston & Old Catton** – Based on planning application / Resolution to Grant at the time of submission.
- **GT13 Norwich RFU** – Based on discussions with developer (Badger Builders).
- **GT14 Land East of Buxton Road** – Based on pre-application discussion with site promoter (Lanpro). Potential Main Modification MaM21 [Document Ref: GTC08] proposes revising the total based on submitted planning application.
- **GT15 Land North of Repton Avenue** – Based on pre-application discussion with site promoter (SDP Planning), modified to take account of localised constraints. Potential Main Modification MaM21 [Document Ref: GTC08] proposes revising the total based on submitted planning application.
- **GT16: North Rackheath** – Based on gross density assumptions derived from Eco-Community Concept Statement Masterplan.
- **GT17: Land adj. Salhouse Road** – Cautious estimate based on delivery of extant planning permission only (District Reference: 20130075). However the allocation site is larger than the permitted site and therefore may exceed forecast.
- **GT18: Land South of Green Lane West** – Based upon dwelling yield estimates within EIA scoping (District Reference: 20140781) received 8 May 2014.
• GT19: Land South of Green Lane East – Based on pre-application discussions with potential developer who were expected to acquire the site at the time of publication (Norfolk Homes).
• GT21 White House Farm North – Is a smaller site than that promoted by the agent (Savills) and assumes a gross density of 25 dwellings per hectare.
• GT22 Land East of Broadland Business Park (North Site) – Assumes a maximum gross density of 25 dwellings per hectare

30. Do these calculations take account of individual site constraints, such as heritage assets or flood risk?

5 of the 14 sites (GT4, GT5, GT6, GT12 & GT17) identified within the Growth Triangle Area Action Plan Submission [Document Ref: GTC01] had either an extant planning permission or resolution to grant planning permission at the time of submission. The forecasts on these sites clearly reflect what is deliverable on these sites, taking into account site specific constraints.

Since the submission of the plan site GT14 has also been granted planning permission and Potential Main Modifications MaM21 and MaM22 [Document Ref: GTC08] address the necessary consequential amendments to the policy. In its modified form this forecast would also clearly reflect what is deliverable on these sites, taking into account site specific constraints.

On the remaining 8 allocation sites the forecast number of dwellings has primarily been derived from a combination of any specific evidence available for each site and the outcome of pre-application discussions with developers, this has ensured as far as practicable that the housing yield estimates are accurate, taking into account individual site characteristics and the intentions of landowners, agents and developers.

Where sites are constrained, for example by likely noise impacts resulting from proximity to the NDR in relation to GT11, GT18 and GT19 this has led to conservative estimates of around 20 dwellings per hectare which provides adequate scope to address those site specific issues.

31. How does the level of growth set out in the table on page 76 of the AAP compare with the level of growth supported by evidence in the table on page 95 of the JCS?

The level of growth set out on page 76 of the Growth Triangle Area Action Plan (AAP) Submission [Document Ref: GTC01] includes a further 895 homes at North Sprowston & Old Catton and a further 450 homes along the Salhouse Road Corridor.

The justification for these additional dwellings is set out in paragraph 9.22 of the AAP.
32. Are the implications of para 7.18 and Policy 22 of the JCS clearly expressed in the AAP?

Paragraphs 9.26 to 9.28 of the Growth Triangle Area Action Plan (AAP) Submission [Document Ref: GTC01], under the heading “Actions to be taken in the event of non-delivery of significant delay to the NDR” specifically signpost Policy 22 and paragraph 7.18 of the Joint Core Strategy [Document Ref: B106].

This is considered to be an appropriate level of detail to be included in the AAP, taking into account paragraph 010 of the Planning Practice Guidance which states “In drafting policies the local planning authority should avoid undue repetition”.

Employment Land/Economic Development/Commercial Development

33. Paragraph 4.6 of the AAP suggests a JCS requirement of 50,000m² of office space at Broadland Business Park (plus 25ha of Employment land at Rackheath). However, para 4.7 correctly states that the JCS requirement for Broadland Business Park is 25ha including 50,000m² of office space. Does this require correction?

Yes. It is proposed that this factual correction is addressed as an Additional Modification.

34. As with housing, a significant portion of employment land is reliant on infrastructure improvements, including the NDR. How much certainty is there regarding their delivery?

The delivery of GT10: Broadland Gate is reliant on the completion of Postwick Junction Improvement. Construction of improvements to Postwick Junction, in the form of Postwick Hub were begun in Spring 2014 and are expected to be completed in Winter 2015.

The delivery of GT9: Broadland Business Park (North) is reliant on the completion of Postwick Junction Improvements and the delivery of a link road between Peachman Way and Plumstead Road. As stated above improvements to Postwick Junction, in the form of Postwick Hub are expected to be completed in Winter 2015. Road details for the discharge of planning conditions relating to the construction of the link road between Peachman Way and Plumstead Road are currently under consideration by Norfolk County Council as Highway Authority.

The delivery of the 25ha of additional employment land at GT16: North Rackheath is dependent upon the delivery of the NDR. The NDR NSIP examination was completed on 2 December 2014, the decision on the NDR is due by 2 June 2015. The NDR benefits from DfT funding for part of the route, from Postwick to the A140, and Norfolk County Council has resolved to underwrite any gap funding.

Consequently there is a high degree of certainty the infrastructure constraints to the delivery of identified strategic employment sites will be overcome in a timely manner.
35. Paragraph 7.4 of the AAP says that the ratio of ‘1m² of employment, retail or community floorspace for each 30m² of residential development’ will only apply to certain allocations. Should these be set out in the policy itself?

The site specific and allocation policies of the Growth Triangle Area Action Plan Submission [Document Ref: GTC01] referred to in paragraph 7.4 (GT7, GT11, GT12 and GT16), clarifies that these sites are identified for mixed use development. In addition, paragraph 7.4 of the AAP also states which sites the mixed use requirements of GT2 apply. Therefore the AAP is considered to be clear in regards to which sites the mixed use element of policy GT1 applies.

Notwithstanding the above Broadland District Council would have no objection to a proposed modification from the inspector for the inclusion of the specific sites in Policy GT1 if considered necessary.

36. Paragraph 7.6 of the AAP says that ‘Masterplans for smaller allocations, less than 500 units, made through the AAP will not be subject to the requirements of policy 2 of the JCS’. However policy 2 refers to a threshold of 500 dwellings or 50,000m² of non-residential floorspace. Does the text in the AAP accurately reflect JCS policy 2 and should this requirement be made clear in the second paragraph of policy GT1?

In order to ensure coherent and high quality development across the Growth Triangle, the provisions of GT1 will apply to all developments site identified within the Growth Triangle Area Action Plan Submission [Document Ref: GTC01].

However, site of over 500 dwellings or 50,000sqm of non-residential floor space would also be subject to the provisions of Policy 2 of the Joint Core Strategy (Document Ref: B106), specifically to be masterplanned using an inclusive and recognised process. This is the clarification intended within paragraph 7.6 of the AAP.

The policy as currently drafted, which includes signposting of the JCS requirement in paragraph 7.6, is considered to contain an appropriate level of detail, taking into account paragraph 010 of the Planning Practice Guidance which states “In drafting policies the local planning authority should avoid undue repetition”.

Notwithstanding the above Broadland District Council would have no significant objection to a proposed modification from the inspector in the form of a further clarifying sentence, if considered necessary. A suggested wording which could be added to the end of Policy GT1 is set out below:

**IN ADDITION, ANY SITE OF OVER 500 DWELLINGS OR 50,000SQM OF NON-RESIDENTIAL FLOOR SPACE MUST ALSO BE MASTERPLANNED USING AN INCLUSIVE AND RECOGNISED PROCESS IN ACCORDANCE WITH THE PROVISIONS OF POLICY 2: PROMOTING GOOD DESIGN OF THE JOINT CORE STRATEGY.**
Infrastructure

37. Does the Council have a contingency plan in the event that the NDR is not permitted?

The substantive contingency addressing the potential non-delivery of the NDR is set out in paragraph 7.18 of the Joint Core Strategy [Document Ref: B106] “if it 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”.

The level of development which can be accommodated in advance of, or in the absence of the NDR is set out in paragraph 9.23 of the Growth Triangle Area Action Plan (AAP) Submission [Document Ref: GTC01]. The table on page 76 of the AAP sets out the sites which are expected to deliver the number of homes identified in paragraph 9.23.

38. Are there any other major infrastructure projects which could prevent or delay allocated sites coming forward e.g. Postwick Junction, new Orbital Link Road and Brook Farm Link Road?

Appendix 7a of the Joint Core Strategy, pages 146 to 165 [Document Ref: B106] sets out priority infrastructure. Priority 1 infrastructure is that which must happen to enable physical growth. Priority 2 infrastructure is that which is essential to the timely delivery of growth in a sustainable manner.

Priority 1 infrastructure includes key elements of transport, water and electricity and green infrastructure. Priority 2 includes education, healthcare and less strategically important elements of green infrastructure.

The Greater Norwich Growth Board (GNGB) manages the delivery programme supporting the implementation of the Joint Core Strategy. The programme is developed through the Greater Norwich Investment Plan (GNIP) [Document Ref GTB44]. The most recently published GNIP, published in March 2015, is included as Appendix B to this response.

Paragraph 3.19 of the GNIP [Appendix C] addresses electricity, paragraph 3.21 and 3.22 address water supply and paragraph 3.23 addresses waste water. The explanation shows that there are no identified utilities constraints that would delay allocated sites coming forwards.

Whilst it is true that the NDR milestones have changed, the extent of the forecast delay is not so significant that it will meaningfully affect the potential rate of development. The Postwick Junction improvements are under construction and are expected to be completed in Winter 2015. The updated milestones published by Norfolk County Council in regards to Postwick Junction and the NDR are set out below:

- Spring 2014 – Postwick Construction Starts
- Summer 2015 – Determination of NDR Application
- Winter 2015 – NDR Construction Begins
- Winter 2015 – Completion of Postwick Junction Works
- Late 2017 – NDR Opens to Traffic
The orbital link road will be delivered alongside development. Details for the discharge of conditions in relation to the Peachman Way to Plumstread Road link and phase of the Salhouse Road to Wroxham Road link are currently under consideration by Norfolk County Council as Highway Authority. This is clearly aligned with the timetable set out within T15.1 and T15.3, of the AAP infrastructure schedule.

Other detail relevant to this question is set out in the answer to question 34.

39. With the exception of the NDR are there any other infrastructure projects, set out in table 10.1 of the appendices of the AAP, behind schedule?

Although there have been some changes and/or re-prioritisation of the infrastructure schedule there are not considered to be any delays that will significantly affect the delivery of development as set out within the AAP.

Notwithstanding the above, a summary of the key changes to the infrastructure schedule is set out below:

- T2a Postwick Junction is now expected to be completed in Winter 2015 not Summer 2015.
- Scheme development work has begun on T11 Bus Rapid Transit Rackheath to City Centre, however delivery has been deferred to 2016/17.
- Scheme development for T19 has been deferred to 2016/17. This deferral enables scheme development to be coordinated with the development / delivery of cycling improvements along North Walsham Road, as part of a re-routed blue pedalway. These improvements have now secured funding through round 2 of the DfT City Cycle Ambition Programme. This scheme development work will also address T20.
- T31.1 will be completed in 2015.
- T31.2 - The crossing of Salhouse Road, providing access to Harrison’s Woodland Park (Project P1.4), will be completed in 2015. However the delivery of the associated cycleway has been deferred. The cycle link will now be delivered through the S106 obligation related to GT5 White House Farm. This is forecast to be delivered in 2022/23 at the latest. Alternate early funding opportunities are being sought.
- T32.1 has been deferred indefinitely. Alternate funding opportunities are being sought.
- Scheme development work for T38 has been brought forward to 2015/16.
- The forecast delivery of EDU2.1 has been brought forward to 2015/16 - 2017/18. EDU2.2 has been brought forward to 2017/18 – 2019/20. EDU2.3 has been brought forward to 2020/21 – 2022/23.
- ED2.4, ED2.5, ED2.6 and ED2.7 have been deferred and are now expected to be delivered between 2023/24 and 2025/26.
- ED9 has been deferred and is now expected to be delivered in the period 2021/22 to 2024/25.

  *N.B The capital programme for the delivery of schools will be subject to ongoing review based on the progress of development.*

- Scheme development work for P1.1 & P2.1 has been deferred to 2015/16.

### 40. Is funding guaranteed for infrastructure that will not be funded through new development?

The infrastructure programme which supports the delivery of the Joint Core Strategy [Document Ref: B106], and wider infrastructure programme as set out in the Greater Norwich Infrastructure Plan (GNIP) [Document Ref: GTB44] utilises funding from a number of different sources, including CIL, S106, mainstream government funding and the co-ordinated investment of public bodies and utility companies.

At the time of writing the GNIP programme is partially funded. Given the size and timescale of the infrastructure investment programme it is not reasonable to expect that the whole infrastructure programme will be fully funded at this point in time.

The Greater Norwich Growth Board (GNGB) has been established to address the issue of infrastructure delivery and ensure the delivery of the critical infrastructure essential to the implementation of the JCS. The GNGB comprises Broadland District Council, Norwich City Council, South Norfolk Council, Norfolk County Council, and the New Anglia Local Enterprise Partnership (LEP).

Annually the GNGB produces the Greater Norwich Infrastructure Plan (GNIP), which identifies both critical and desirable infrastructure that supports the growth programme and helps co-ordinate and manage delivery.

The GNIP informs the Greater Norwich Growth Programme. Also produced annually, the Growth Programme: prioritises schemes for delivery and development; assesses the financial implications for income and expenditure; and, considers the cumulative and long term financial impact of funding decisions.

The GNGB also manages the Greater Norwich City Deal [Document Ref: B66]. Alongside enterprise and skills initiatives, the City Deal provides access to £80M of funding from the Public Works Loan Board (PWLB). These borrowing powers have enabled a £60M fund for critical strategic infrastructure projects to be established and a £20M Local Infrastructure Fund, providing loans to developers and helping to ensure that development sites can be delivered quickly.

Therefore, overall there can be significant confidence that the organisational structures and activities of the GNGB will ensure that the strategic infrastructure programme will be delivered in a timely manner in order to enable the delivery of sustainable development.
41. Where off-site infrastructure is to be provided by developers will the sites be viable? Has this been thoroughly tested?

Viability testing of the proposals for the growth triangle was initially undertaken as part of the examination into the part JCS during 2013. In paragraph 45 of his report on the JCS [Document Ref: 103] the inspector concluded that “this financial testing shows that the developments proposed will be viable for developers and that there is likely to be sufficient viability to incentivise willing landowners to make the sites available for development”.

Since the adoption of the JCS, Broadland has produced further evidence on the viability of development through the Broadland District Viability Study [Document Ref: B73]. This report considers specific typologies which are consistent with the allocations made in the AAP, and the financial testing takes account of likely strategic infrastructure costs. As part of the study, the Council invited comments from agents representing the owners of the sites included in the emerging plans and developers. The feedback received provided reassurance that the sites are likely to come forward as a result of the GTAAP on the basis that they are both viable and deliverable (see Appendix 7 of Document Ref: B73). As per paragraph 6.3 of the Broadland District Viability Study, the results of the modelling on all residential typologies (including those typical of sites allocated within the AAP) showed a residual value greater than the threshold value indicating that there is a realistic prospect of development coming forward as a result of the GTAAP.

42. Paragraph 7.31 of the AAP says that missing elements of roads between St Faiths Road and Repton Avenue and Salhouse Road and Plumstead Road will be achieved through the delivery of new allocations. What are the implications of these allocations not coming forward as planned?

It is important to note whilst the missing elements of the road links between St Faiths Road and Repton Avenue/Norwich Airport Industrial Estate and between Salhouse Road and Plumstead Road are essential to achieving the most effective transport network across the growth triangle, they are not absolutely critical in order to ensure the satisfactory functioning of the highway network.

Taking the St Faiths Road to Repton Avenue link first. It is notable that an outline planning application has been submitted for this allocation. This includes an illustrative layout which would enable ongoing connections to the Airport Industrial Estate via either Hurricane Way or Repton Avenue/Meteor Close. The preferred connection to the Airport Industrial Estate to be established through a feasibility assessment the outcome of which is expected to be known in 2015/16.

Notwithstanding the above in the absence of an ongoing road link between St Faiths Road and Repton Avenue/Airport Industrial Estate pedestrian and cycle traffic would be able to use the existing connection between St Faiths Road and Repton Avenue, which will be stopped up to general traffic as a consequence of the North Sprowston and Old Catton development. There exists cycle and pedestrian links between Repton Avenue and the Airport Industrial Estate via the uncompleted bus link between Repton Avenue and Meteor Close. Public Transport would be reliant on the completion of the aforementioned bus link and would need to be orbitally routed along Spixworth Road and Lodge Lane.
In the absence of the Plumstead Road to Salhouse Road link all traffic would travel between these radials via the existing Woodside Road or the NDR.

The non-delivery of one or both of these links would result in a suboptimal road layout, which would make orbital movements between Broadland Business Park and Norwich Airport Industrial Estate notably less direct. However, it would not be severely detrimental to the functioning of the highway network and orbital public transport and cycling links would remain achievable.

43. Does the housing trajectory build in any time for potential delays with highway infrastructure projects?

The housing trajectory is based on a reasonable set of assumptions about the likely commencement date of sites and annual delivery rates, taking into account the expected delivery of infrastructure. Contingency for potential delays to highway infrastructure has not been incorporated. There is not considered to be any current evidence of likely delays to highway infrastructure that would significantly affect the realisation of the housing trajectory.

If such delay did occur it would be identified within the annual monitoring report and addressed through the proposed review of the local plan.

### The natural environment and Green Infrastructure

44. Is the HRA adequate?

The Growth Triangle AAP Habitat Regulations Assessment [Document Ref: GTC07] was revised in November 2014 having had regard to comments made in response to the publication of the Area Action Plan. On the basis of the revised HRA Natural England confirmed on 28 November 2014 that “the HRA is compliant with the Habitat Regulations in that it has properly assessed the likely significant and adverse effects of the Growth Triangle Area Action Plan on European protected sites”.

A copy of Natural England’s letter confirming the compliance and adequacy of the AAP HRA is included at the rear of the AAP Habitat Regulations Assessment.

45. Is an ecological mitigations, management and monitoring strategy necessary to support the Plan?

It is not considered necessary to produce an ecological mitigation, management and monitoring strategy. Having considered the Growth Triangle AAP Sustainability Appraisal [Document Refs: GTC02, GTC03 & GTC04] and revised Growth Triangle Habitat Regulations Assessment [Document Ref: GTC07] Natural England did not request an additional strategy and only one additional monitoring target, a proposed modification to address this request is proposed as Main Modification MaM18 in the Schedule of Proposed Additional Mods and Potential Main Modifications [Document Ref: GTC08].
The Green Infrastructure Programme Team of the Greater Norwich Growth Board (GNGB) is tasked with identifying, prioritising and coordinating the delivery of strategic green infrastructure for inclusion in the Greater Norwich Infrastructure Plan (GNIP) [Appendix C] and provides annual updates to the infrastructure programme. The GNIP includes all the green infrastructure projects that are described (or required by policies) within the AAP, a number of which relate specifically to ecology, notably protecting and enhancing the local ecological networks in line with requirements in paragraph 117 of the NPPF. Ecological mitigation is summarised in the Growth Triangle Green Infrastructure Key Diagram, which can be found in Appendix D of the Statement on Green Infrastructure [Document Ref: GTB48].

Developers are required to mitigate for any adverse impacts on ecology within their sites (eg DMDPD policy EN1) and, where significant ecological mitigation is required, landscape and ecological management plans (LEMPs), also known as Habitat or Biodiversity Management Plans, are usually conditioned. Where European Protected Species licences are required, monitoring is a requirement of the licence.

The proportion of local sites (County Wildlife Sites and Geodiversity Sites) in ‘positive conservation management’ is monitored annually as a requirement of the Single Data List for central government. This is completed by Norfolk Biodiversity Information Service (NBIS) in association with the Norfolk Local Site Partnership and the Norfolk Wildlife Trust. Broadland Council, along with every other local authority in Norfolk, is also a partner in a project managed by the Norfolk Biodiversity Partnership which is undertaking monitoring of impacts on biodiversity from recreational use on Natura 2000 sites throughout the county.

46. Are any of the allocated sites on ‘best and most versatile agricultural land’. If so, what is the justification for this given the advice in paragraph 112 of the National Planning Policy Framework.

As set out within the Appraisal of the Draft Plan, under ENV9 on page 91 of the Sustainability Appraisal Main Report [Document Ref: GTC02] the development of sites GT9: Broadland Gate, GT11: Land East of Broadland Business Park and G12: North Sprowston and Old Catton would result in the loss of Grade II agricultural land. If released for development under the Policy GT20 trigger, reserve site GT22: Land East of Broadland Business Park (North) would also affect areas of Grade II agricultural land.

Site GT9: Broadland Gate is subject to an extant planning permission. Site GT12: North Sprowston & Old Catton is subject to a resolution to grant planning permission, which is expected to be issued as a planning permission in advance of the adoption of the AAP. Consequently both of these sites form part of the baseline of the AAP. As set out in paragraph 6.6 and 6.7 of the Growth Triangle Sustainability Appraisal Main Report it was considered an unreasonable alternative not to include these sites in the AAP given that they form part of the AAP baseline.

Technical Appendix D of the Sustainability Appraisal [Document Ref: GTC04] explains why sites were included or discounted as reasonable alternatives having considered them against the AAP objectives. Technical appendix H explains the site selection process. Of particular relevance is section 5 which reflects the findings of paragraph 8.5 of the Sustainability Appraisal Main Report. Paragraph 8.5 states that
the site selection process should focus on those sites with the greatest potential to start early and deliver within the JCS plan period. This is because it will help to ensure early delivery and as far as practicable reduce the need to release the reserve sites.

In regards to the reserve site, GT22: Land East of Broadland Business Park, this was included as a reserve site as it met the criteria set out under 8.5 of the Sustainability Appraisal Main Report in that it was capable of providing flexibility to meet unforeseen or changing circumstances as, although it was not considered an early delivery site, did have the potential to provide homes within the plan period.

47. Paragraph 7.17 refers to the delivery of large set piece parks. Should the requirement for these be set out in a policy?

The requirement for Harrison’s Plantation Woodland Park is set out in Policy GT5: White House Farm. White House Farm is subject to an extant planning permission, which includes a requirement to provide the woodland park. Through the Greater Norwich Growth Programme Broadland has secured funding to accelerate the delivery of this woodland park and is currently in negotiations with the development consortium for White House Farm to secure the transfer of the site and the parkland is expected to be opened in 2015.

The requirement for the Beeston Country Park is set out in GT12: North Sprowston and Old Catton. This site is subject to a resolution to grant planning permission, which is expected to have been granted before the examination of the AAP. The conditions attached to the resolution to grant planning permission require the provision of Beeston Country Park within the first phase of development.

Policy GT16: North Rackheath specifically requires the provision of an area of public open space of at least 30ha in size. The exact timing of the delivery of this parkland would be determined through the application process, taking into account the findings of a site specific HRA. GT16 specifically states that no development will be permitted until a phasing plan showing the orderly sequence of development has been approved. This would include the parkland.

48. Should paragraph 7.19 also refer to relevant policies in the emerging DM DPD?

Broadland District Council proposes that an additional modification as set out below is added to the end of paragraph 7.19.

The North East Water Cycle Study [Document Ref: GTB33] specifically considered the issue of flood risk, concluding that only the area along the line of Breck Brook was at risk of fluvial flooding, and even then the areas of Flood Zone 2 & 3a only extend approximately 50m from the water course. The NEWCS also identifies that risks from Ground Water Flooding are not present within the majority of the Growth Triangle, although the Springs at Dobbs Beck is listed as an indicative area of ground water flood risk.

On the basis of the above findings it was concluded that all of the potential allocation sites within the AAP were within flood zone 1 for fluvial flooding, and outside of an area of significant risk of Ground Water flooding. Therefore, in accordance with the advice of the NPPG, the sequential test was passed in regards to these two types of flooding.

The NEWCS also considered issues of Surface Water Flooding, concluding that there were areas at risk of surface water flooding, with higher risk areas being those which lie within natural depressions in the landscape, adjacent to the route of existing water courses. The potential for deep surface water flooding in the Blue Boar Lane area was noted prior to the culvert under Sprowston Manor golf course and that any such event in the future could present a risk to committed development at Home Farm and the Crane Croft Road area.

When compared to the Environment Agency’s indicative Surface Water Flooding and Flood Maps it is clear that a number of potential allocation sites in the Growth Triangle are affected by potential incidences of Surface Water Flooding across part of the site area. These incidences are typical of land throughout Broadland and in the area surrounding the urban fringe. In general, the parts of allocation sites affected are at low risk of surface water flooding, although some incidences of higher flood risk do occur, most notably in relation to allocation site GT19: Land South of Green Lane East and reserve allocation site GT21: White House Farm (North-East). It is expected that within all allocation sites the layout of development should account for, and avoid areas at risk of Surface Water Flooding. The forecast housing yield of GT19 is at a gross density of only 20-22 units per hectare to account for necessary mitigation of surface water and noise issues. If the layout of development avoids areas at risk of Surface Water Flooding, as expected, then development on all allocations would be considered to be within Flood Zone 1, outside of areas at risk of Ground Water Flooding and on areas at low risk of Surface Water Flooding, therefore clearly passing the Sequential Test.
Where incidences of Surface Water Flood Risk occur, they are specifically considered under sustainability objective ENV7. All of the proposed allocation sites were assessed in regards to flood risk in appendix I of the Growth Triangle AAP Sustainability Appraisal Technical Appendix [Document Ref: GTC04]. This assessment concluded that there was no evidence to indicate that any such surface water flood risk could not be mitigated through the use of SUDs and that even if this proved to be the case development could be resisted under JCS policy 1.

**Monitoring and Implementation Framework**

50. The Monitoring Framework does not include triggers or actions to be taken in the event of non-delivery against the Plan’s objectives. A number of the monitoring criteria are not comprehensive. For example GT1 is monitored in relation to the provision of a mix of uses, but not the requirements for master plans. Is this deliberate?

Paragraph 027 of the National Planning Policy Guidance [Document Ref: A31] states that local planning authorities must publish information at least annually that shows progress with Local Plan preparation, reports activity relating to the duty to cooperate and shows how the implementation of policies in the Local Plan is progressing.

The monitoring framework set out on pages 79 to 84 of the document seeks to specifically address the final of these requirements by identifying key targets and milestones. The first two provisions are already addressed through the publication of the Greater Norwich Annual Monitoring Report [Document Ref: B105] and its appendices and will continue to do so.

The monitoring framework is considered to be a proportionate and appropriate response which will effectively monitor the implementation of the Growth Triangle Area Action Plan (AAP) Submission [Document Ref: GTC01] and provide the necessary information to make communities aware of the progress of the plan and inform the plan review identified within the answer to question 28.

Specifically in response to the question on GT1, the monitoring target does not propose monitoring masterplans as this is a requirement of the Joint Core Strategy (JCS) [Document Ref: B106] not the AAP. The effect of the AAP in terms of masterplanning has been clarified in the answer to question 36.
Omissions sites

51. There are a number of sites being promoted by representors through the representations. Having briefly set out why each of these sites were not allocated by the Council and whether they were considered as part of the sustainability appraisal, where possible can you provide a plan for each site?

Representations were received on seven non-allocated omission sites. These sites are listed below. Sites 1-3 were promoted at earlier stages in the plan making process and were specifically considered through the Sustainability Appraisal (SA). Sites 4 and 5 are sites where the boundary has been amended significantly from earlier stages in the plan making process and therefore have not been explicitly considered in the SA in the form in which they are now promoted. Sites 6 and 7 are new sites which were not promoted through the Regulation 18 consultation on the AAP in 2013 and have therefore not been considered in the SA.

1. White House Farm (North-East) (96.3 ha), Persimmon/Taylor/Wimpey/Hopkins, Savills, Colin Campbell
2. Thorpe Woodlands (80.9 ha), Socially Conscious Capital, Turley Associates, Graeme Warriner
3. Land East of Broadland Business Park (North) – (54.6 ha), Lothbury Property Trust, Landmark Planning, Peter Wilkinson
4. Land between Mahoney Green and Trinity Close (extension to Gazebo Farm) (8.7 ha), Woods Hardwick, Richard Murdock
5. Land North of Moorsticks, Buxton Road (0.8 ha), Gary Fenn
6. Land North of Thorpe End (13 ha), Philip Jeans Homes Ltd, Pegasus Planning, Mervyn Dobson
7. Silver Birches, Buxton Road (11.6 ha), SGP Land and Development, Stephen Pickering

Reasons for not allocating.

1. White House Farm (North-East)

This site is optioned to a development consortium comprising Persimmon Homes, Hopkin Homes and Taylor Wimpey. This consortium is also developing the 1,233 home scheme at White House Farm (South-West), which has only recently begun and is identified in Policy GT5 of the Growth Triangle AAP Proposed Submission Document [Document Ref: GTC01].

The site was identified as a reasonable alternative in technical appendix D of the Growth Triangle Sustainability Appraisal (SA), pages 156-159 [Document Ref: GTC04]. However as development on site is linked to the progress/completion of
the council does not expect construction to be begun until 2023/24. Consequently alternative, early delivery, allocation sites were preferred. This decision is explained in technical appendix H of the SA, pages 259 to 277.

Whilst not preferred as an allocation, a smaller version of the site, approximately 20ha, was identified as reserve site GT21. The justification for reserve sites is set out under question 20, for the sake of brevity this has not been repeated here. The site was selected as a reserve site because it was considered to have potential to deliver between 375 and 500 units by 2026.

The consortium’s agent claimed in their representations on the published AAP that the site could be begun earlier, would deliver more homes by 2026 than assumed and should be allocated in preference to GT19. However no compelling evidence was provided to justify the claims for earlier or higher rates of delivery. Also the allocation of the whole site, in substitution to GT19, would significantly exceed the JCS housing requirements, which is considered premature and unjustified. The Council’s response to the agent’s representations (GTPS126, GTPS100, GTPS128, GTPS129) can be found on pages 39, 103, 105 and 106 of the Area Action Plan (proposed submission version) Representations Report [Document Ref: GTC06]. The implications of the agent’s representation were also considered in an update to technical appendix H of the SA, pages 271 to 277. This reaffirmed that the AAP allocations were the most appropriate when considered against reasonable alternatives.

2. Thorpe Woodlands

The question of potential development in Thorpe Woodlands received 1,434 representations in response to the Area Action Plan Options Consultation, March to June 2013. Almost all comments objected to the development of the site. Paragraph 3.155, pages 62, 63 and 64 of the Statement of Consultation [Document Ref: GTC09] sets out the main issues that were raised.

The suitability of Thorpe Woodlands as a reasonable alternative site is considered in technical appendix D of the SA, pages 180 to 182. The appendix concluded whilst the site was geographically well placed to support the delivery of a number of AAP objectives, the significance of the concerns about the ecological impact of the development of the site clearly suggests that the site is inappropriate for development. This conclusion is supported by the ecological advice provided by Norfolk County Council in the form of the Appraisal of the submitted documents relating to Thorpe Woodlands from Socially Conscious Capital [Document Ref: GTB34]

The agent in their representations on the published AAP has also proposed that Thorpe Woodlands be allocated as public open space. However, no clear mechanism exists to deliver this allocation, other than partial development of the woods. This is considered inappropriate for the reasons set out above. Consequently
any open space allocation could not be considered deliverable. The council’s response to the agent’s representation (GTPS87 and GTPS88) can be found on pages 53 and 69 of the AAP Representations Report.

3. Land East of Broadland Business Park (North)

This site has been considered as part of a wider area of land east of Broadland Business Park, which includes proposed AAP allocation GT11. The site was identified as a reasonable alternative in technical appendix D of the Growth Triangle Sustainability Appraisal (SA), pages 167-170. However, the site is not being promoted as a single site. The southern part of the site, which is the subject of policy GT11, is promoted by Pegasus Planning, on behalf of I-Field Estates. The northern part of the site, which is not allocated, is promoted by Landmark Planning on behalf of Lothbury Investment Management.

Lothbury Investment Management also has control over the site identified as GT6 within AAP. Whilst Pegasus Planning were actively promoting the submission of the early application on GT11, a similar timescale did not appear likely for the northern part of the site. Consequently, the southern site is proposed for allocation but alternative sites, which also had the potential for early delivery, were preferred to the northern site. This decision is explained in technical appendix H of the SA, pages 259 to 277.

Whilst not preferred as an allocation, the northern site is identified as reserve site GT22. The justification for reserve sites is set out under question 20, for the sake of brevity this has not been repeated here. The site was selected as a reserve site because it was considered to have potential to deliver up to 500 units by 2026, but wouldn’t be likely to deliver in the first five years of the plan.

The consortium’s agent in their representations on the published AAP argues that the site should be allocated and an area north of Middle Road, also in Lothbury’s control, should be allocated as open space. Alternatively, the sites release should be brought forward to 2017/18. This was necessary to ensure as many development sites as possible are available, because Landmark considers the Council’s housing trajectory overly optimistic. However no compelling evidence was provided to justify that the delivery assumptions of the AAP were wrong. The allocation of all suitable available sites would significantly exceed the JCS housing requirements, which is considered premature and unjustified. This alternative was specifically considered in section 8, pages 63 to 75, of the Area Action Plan Sustainability Appraisal Main Report [Document Ref: GTC02].

The Council’s response to the agent’s representations (GTPS103 and GTPS104) can be found on pages 108 and 109 of the AAP Representations Report. The implications of the agent’s representation were also considered in an update to technical appendix H of the SA, pages 271 to 277. This reaffirmed that the AAP allocations were the most appropriate when considered against reasonable
alternatives.

4. Land between Mahoney Green and Trinity Close (extension to Gazebo Farm)

The site was partially considered as Gazebo Farm, and was discounted as a reasonable alternative site, see sustainability appraisal technical appendix D pages 194. However, at a late stage in the plan making process Broadland were informed that the boundaries of the site changed, this was too late for it to be taken into account in the publication document, and consequently was not considered in detail in the sustainability appraisal.

The changes to the site comprised the removal of land south of the NDR, and the incorporation of additional land fronting Green Lane West between Mahoney Green and Trinity Close.

The council considers that the site should not be preferred as an allocation for the reasons set out in the response to GTPS64, page 6 of the AAP Representations Report. Specifically that, whilst the parts of the site nearest Green Lane West would likely be considered a reasonable alternative, the parts of the site nearest the NDR are likely to be somewhat constrained by the impact of noise. Also the site is not as well located relative to the existing village, and existing services and facilities as the other sites, GT18 and GT19, which are allocated in the plan. Also that the AAP already makes adequate provision for new homes and the identification of additional land for housing is not necessary.

No sustainability appraisal information regarding the site was submitted with the representation, which demonstrated why the site should be considered more appropriate than the proposed allocation sites.

5. Land north of Moorsticks, Buxton Road

The land north of Moorsticks, off Buxton Road, was originally considered as part of a much larger area, referred to as Land adj. Redhall Farm. The explanation of why this larger site was considered unreasonable is set out appendix D of the SA technical appendix, pages 149 - 152 explains that the land adjacent Redhall Hall is an unreasonable alternative.

It was only through representations on the publication of the AAP that it became clear that the site was being promoted as a single entity. Consequently the site was not specifically considered in the AAP SA.

Whilst this smaller site does not have the scale of negative impact that the larger site considered would have had, i.e. constrained by the airport public safety zone, largely within the 54db noise contour and significantly impacting on the landscape setting to the urban edge of the Norwich fringe, the site is still detached from other allocations and remains close to the edge of the 54db noise contour. Therefore the council considers that the site should not be preferred as an allocation. This is set out in the
response to GTPS14, page 87 of the AAP Representations Report.

Since the submission of the AAP the Moorsticks site has been the subject of a planning application (District Reference: 20141938). This application has highlighted further difficulties of developing the site in isolation. The application was refused in March 2015 on the basis that the visibility splay on to the Buxton Road is restricted by the presence of a mature oak tree and that the site’s separation from other permitted or planned development would form an incongruous form of development. A copy of the decision notice is included as appendix E to this letter.

No sustainability appraisal information regarding the site was submitted with the representation, which demonstrated why the site should be considered more appropriate than the proposed allocation sites.

6. Land North of Thorpe End

The land north of Thorpe End was promoted in response to the publication of the AAP and has subsequently not been considered in detail as part of the SA.

The Council’s response to the Agent’s representations (GTPS101, GTPS99, GTPS100 and GTPS164) can be found on pages 70, 101, 103 and 105 of the AAP Representations Report. Specifically the Council considers that the site is inappropriate for development because it would envelop Thorpe End Garden Village, diminishing the existing sense of separation beyond an acceptable level.

No evidence was provided about the deliverability or developability of the site, nor was sustainability appraisal information regarding the site submitted with the representation, which demonstrated why the site should be considered more appropriate than the proposed allocation sites.

7. Silver Birches, Buxton Road

Silver Birches was promoted in response to the publication of the AAP and has subsequently not been considered in detail as part of the SA.

The Council’s response to the Agent’s representations (GTPS22) can be found on pages 5 of the AAP Representations Report. Specifically the Council notes that the site lies immediately adjacent to the Airport Safety Zone, and a large part of the site lies within the 54db to 57db noise contour, which raises concerns about the suitability of the site for residential development. No evidence was provided about the deliverability or developability of the site. There was also no demonstration that there had been any engagement with the Norwich International Airport, to confirm that development of the site would be compatible with the ongoing operation of the Airport. Furthermore, no sustainability appraisal information was submitted with the representation explaining why the site should be considered more appropriate than the proposed allocation sites.
Conclusions

For the reasons set out above it is considered that the council's approach to the omission sites was fully justifiable. A plan showing the boundaries of the aforementioned omission sites is included as appendix D to this letter.
Appendix A – Growth Triangle AAP Proposed Submission Document including Potential Main Modifications and Proposed Additional Modifications as Track Changes


Appendix C – Greater Norwich Infrastructure Plan (GNIP), March 2015

Appendix D – Omission Sites Maps pursuant to question 51

Appendix E – Copy of Decision Notice for Moorsticks.