

## Greater Norwich Call for Sites Submission Form

FOR OFFICIAL USE ONLY	
Response Number:	
Date Received:	

This form is to be filled out by any interested parties who want to promote a site for a specific use or development to be allocated in the Greater Norwich Local Plan.

Only one form should be submitted for each individual site i.e. it is not necessary for a separate form to be completed for each landowner on a single site in multiple ownerships. However, a separate form must be completed for each individual site submitted.

Your completed form should be returned to the Greater Norwich Local Plan team no later than **5pm on Friday 8 July 2016**.

By email: [callforsites@gnlp.org.uk](mailto:callforsites@gnlp.org.uk)

Or, if it is not possible submit the form electronically,

By Post to:

*Greater Norwich Local Plan Team*  
PO Box 3466  
Norwich  
NR7 7NX

The responses received as part of the Greater Norwich Local Plan Call for Sites will be published and made available for public viewing. By submitting this form you are consenting to the details about you and your individual site(s) being stored by Norfolk County Council and shared with Broadland District Council, Norwich City Council and South Norfolk District Council, and that the details of the site will be published for consultation purposes.

Further advice and guidance can be obtained by visiting the Greater Norwich Local Plan website or by contacting the Greater Norwich Local Plan team directly:

Website: [www.greaternorwichlocalplan.org.uk](http://www.greaternorwichlocalplan.org.uk)

E-mail: [callforsites@gnlp.org.uk](mailto:callforsites@gnlp.org.uk)

Telephone: 01603 306603

<b>1a. Contact Details</b>	
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address	
Post Code	
Telephone Number	
Email Address	

<b>1b. I am...</b>	
Owner of the site	Parish/Town Council
Developer	Community Group
Land Agent	Local Resident
Planning Consultant	Registered Social Landlord
Other (please specify):	

<b>1c. Client/Landowner Details</b> (if different from question 1a)	
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address	
Post Code	
Telephone Number	
Email Address	

<b>2. Site Details</b>	
Site location / address and post code  (please include as an attachment to this response form a location plan of the site on an scaled OS base with the boundaries of the site clearly shown)	
Grid reference (if known)	
Site area (hectares)	

<b>Site Ownership</b>		
<b>3a. I (or my client)....</b>		
Is the sole owner of the site	Is a part owner of the site	Do/Does not own (or hold any legal interest in) the site whatsoever
<b>3b. Please provide the name, address and contact details of the site's landowner(s) and attach copies of all relevant title plans and deeds (if available).</b>		
<b>3c. If the site is in multiple landownerships do all landowners support your proposal for the site?</b>	Yes	No
<b>3d. If you answered no to the above question please provide details of why not all of the sites owners support your proposals for the site.</b>		

<b>Current and Historic Land Uses</b>		
<b>4a. Current Land Use</b> (Please describe the site's current land use e.g. agriculture, employment, unused/vacant etc.)		
<b>4b. Has the site been previously developed?</b>	Yes	No

**4c. Describe any previous uses of the site.** (please provide details of any relevant historic planning applications, including application numbers if known)

--

**Proposed Future Uses**

**5a. Please provide a short description of the development or land use you proposed** (if you are proposing a site to be designated as local green space please go directly to question 6)

--

**5b. Which of the following use or uses are you proposing?**

Market Housing	Business & offices	Recreation & Leisure
Affordable Housing	General industrial	Community Use
Residential Care Home	Storage & distribution	Public Open Space
Gypsy & Traveller Pitches	Tourism	Other (Please Specify)

**5c. Please provide further details of your proposal, including details on number of houses and proposed floorspace of commercial buildings etc.**

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**5d. Please describe any benefits to the Local Area that the development of the site could provide.**

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<b>Local Green Space</b>
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If you are proposed a site to be designated as Local Green Space please complete the following questions. These questions do not need to be completed if you are not proposing a site as Local Green Space. Please consult the guidance notes for an explanation of Local Green Space Designations.
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<b>6a. Which community would the site serve and how would the designation of the site benefit that community.</b>
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<b>6b. Please describe why you consider the site to be of particular local significance e.g. recreational value, tranquillity or richness in wildlife.</b>
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<b>Site Features and Constraints</b>
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Are there any features of the site or limitations that may constrain development on this site (please give details)?
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<b>7a. Site Access:</b> Is there a current means of access to the site from the public highway, does this access need to be improved before development can take place and are there any public rights of way that cross or adjoin the site?
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<b>7b. Topography:</b> Are there any slopes or significant changes of in levels that could affect the development of the site?
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<b>7c. Ground Conditions:</b> Are ground conditions on the site stable? Are there potential ground contamination issues?
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<b>7d. Flood Risk:</b> Is the site liable to river, ground water or surface water flooding and if so what is the nature, source and frequency of the flooding?
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<b>7e. Legal Issues:</b> Is there land in third party ownership, or access rights, which must be acquired to develop the site, do any restrictive covenants exist, are there any existing tenancies?
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**7f. Environmental Issues:** Is the site located next to a watercourse or mature woodland, are there any significant trees or hedgerows crossing or bordering the site are there any known features of ecological or geological importance on or adjacent to the site?

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**7g. Heritage Issues:** Are there any listed buildings, Conservation Areas, Historic Parklands or Schedules Monuments on the site or nearby? If so, how might the site's development affect them?

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**7h. Neighbouring Uses:** What are the neighbouring uses and will either the proposed use or neighbouring uses have any implications?

--

**7i. Existing uses and Buildings:** are there any existing buildings or uses that need to be relocated before the site can be developed.

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**7j. Other:** (please specify):

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**Utilities**

**8a. Which of the following are likely to be readily available to service the site and enable its development? Please provide details where possible.**

	Yes	No	Unsure
Mains water supply			
Mains sewerage			
Electricity supply			
Gas supply			
Public highway			
Broadband internet			

Other (please specify):	
<b>8b. Please provide any further information on the utilities available on the site:</b>	

<b>Availability</b>	
<b>9a. Please indicate when the site could be made available for the land use or development proposed.</b>	
Immediately	
1 to 5 years (by April 2021)	
5 - 10 years (between April 2021 and 2026)	
10 – 15 years (between April 2026 and 2031)	
15 - 20 years (between April 2031 and 2036)	
<b>9b. Please give reasons for the answer given above.</b>	

<b>Market Interest</b>		
<b>10. Please choose the most appropriate category below to indicate what level of market interest there is/has been in the site. Please include relevant dates in the comments section.</b>		
	Yes	Comments
Site is owned by a developer/promoter		
Site is under option to a developer/promoter		
Enquiries received		

Site is being marketed		
None		
Not known		

<b>Delivery</b>	
<b>11a. Please indicate when you anticipate the proposed development could be begun.</b>	
Up to 5 years (by April 2021)	
5 - 10 years (between April 2021 and 2026)	
10 – 15 years (between April 2026 and 2031)	
15 - 20 years (between April 2031 and 2036)	
<b>11b. Once started, how many years do you think it would take to complete the proposed development (if known)?</b>	

<b>Viability</b>			
<b>12a. You acknowledge that there are likely to be policy requirements and Community Infrastructure Levy (CIL) costs to be met which will be in addition to the other development costs of the site (depending on the type and scale of land use proposed). These requirements are likely to include but are not limited to: Affordable Housing; Sports Pitches &amp; Children's Play Space and Community Infrastructure Levy</b>			
	Yes	No	Unsure
<b>12b. Do you know if there are there any abnormal costs that could affect the viability of the site e.g. infrastructure, demolition or ground conditions?</b>			
<b>12c. If there are abnormal costs associated with the site please provide details:</b>			
<b>12d. Do you consider that the site is currently viable for its proposed use taking into account any and all current planning policy and CIL considerations and other abnormal development costs associated with the site?</b>			

12e. Please attach any viability assessment or development appraisal you have undertaken for the site, or any other evidence you consider helps demonstrate the viability of the site.

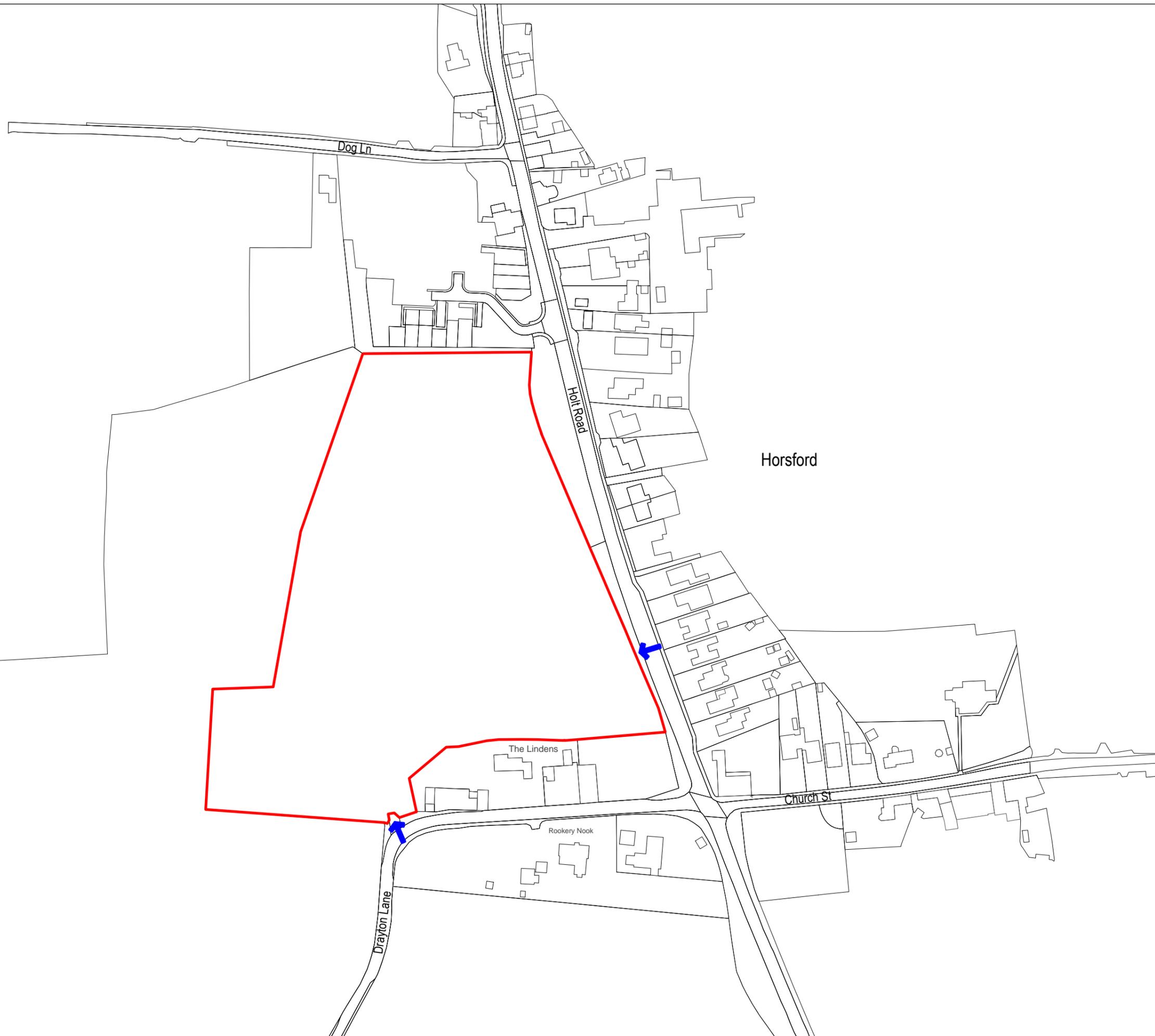
**Other Relevant Information**

13. Please use the space below to for additional information or further explanations on any of the topics covered in this form

<b>Check List</b>	
Your Details	
Site Details (including site location plan)	
Site Ownership	
Current and Historic Land Uses	
Proposed Future Uses	
Local Green Space (Only to be completed for proposed Local Green Space Designations)	
Site Features and Constraints	
Utilities	
Availability	
Market Interest	
Delivery	
Viability	
Other Relevant Information	
Declaration	

<b>14. Declaration</b>	
<p>I understand that:</p> <p><b>Data Protection and Freedom of Information</b></p> <p>The Data Controller of this information under the Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk District Council. The purposes of collecting this data are:</p> <ul style="list-style-type: none"> <li>• To assist in the preparation of the Greater Norwich Local Plan</li> <li>• To contact you, if necessary, regarding the answers given in your form.</li> <li>• To evaluate the development potential of the submitted site for the uses proposed within the form.</li> </ul> <p><b>Disclaimer</b></p> <p>The responses received as part of the Greater Norwich Local Plan "Call for Sites" will be published and made available for public viewing. By submitting this form you are consenting to the details about you and your individual sites being stored by Norfolk County Council, and the details being published for consultation purposes. Any information you consider to be confidential is clearly marked in the submitted response form and you have confirmed with the Council(s) in advance that such information can be kept confidential as instructed in the Greater Norwich Local Plan Call for Sites Response Form Guidance Notes.</p> <p>I agree that the details within this form can be held by Norfolk County Council and that those details can be shared with Broadland District Council, Norwich City Council and South Norfolk District Council for the purposes specified in this declaration.</p>	
Name	Date





Site Boundary  
1/2000 (A3)

Note

SUMMARY

— Site Boundary

→ Access

Site Area 3.83 Ha

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Number 0100031673

PROJECT TITLE  
Holt Road, Horsford

PROJECT NUMBER  
LAN001-0480

CLIENT  
Glavenhill

DRAWING TITLE  
Site Boundary

DRAWING NUMBER REV  
001 -

SCALE  
1/2000 (A3)

DATE  
JUNE 2016

DRAWN BY  
JBA

**Lanpro**  
Planning and Development Consultants

4 St Mary's House, Duke Street  
Norwich, NR3 1QA  
01603 628 464  
www.lanproservices.co.uk



**Note**

**SUMMARY**

- Access
- Site Boundary
- Housing Net Developable Area
- Green Infrastructure
- Shared Road & Footways
- Road

Site Area	3.83 Ha
Net Developable Area	2.00 Ha
Gross Housing Density	21Dw@Ha
Net Housing Density	40Dw@Ha
No. Houses	80 Houses
Green Infrastructure	1.32 Ha
Green Infrastructure	34%

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PROJECT TITLE  
 Holt Road, Horsford

PROJECT NUMBER  
 LAN001-0480

CLIENT  
 Glavenhill

DRAWING TITLE  
 Proposal Plan

DRAWING NUMBER    REV  
 002                      -

SCALE  
 1/2000 (A3)

DATE  
 JUNE 2016

DRAWN BY  
 JBA



Brettingham House, 98 Pottergate,  
 Norwich, NR2 1EQ  
 01603 631 319  
 www.lanproservices.co.uk

Proposal Plan  
 1/2000 (A3)



Location Plan  
1:5000(A1)

Access 1  
Access 2

Access 1:  
4.8m carriageway width  
2 x 1.5m wide footways  
Approx. 220m<sup>2</sup> of existing access to be removed  
Approx. 56m of new footway required

The Lindens

The Barn

Rookery Nook



Site Access 1  
1:500(A1)



Site Access 2  
1:500(A1)

Access 2:  
4.8m carriageway width  
2 x 1.5m wide footways  
10m of new footway required

The Lindens

The Barn

Rookery Nook

Holt Road

33.7m

Note

SUMMARY

-  Site Boundary (Area: 4.06 Ha)
-  Proposed new 1.5m footway
-  Existing access to be abandoned
-  2.4m x 90m visibility splay

PROJECT TITLE  
**Holt Road, Horsford**

PROJECT NUMBER  
**0408**

CLIENT

DRAWING TITLE  
**Site Access Layout**

DRAWING NUMBER    REV  
**0408/001            B**

SCALE  
**1:500 (A1)**

DATE  
**June 2016**

DRAWN BY  
**EAE**

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[Transport and Travell]

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Norwich, NR2 1EQ  
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# Briefing Note

Site: Holt Road, Horsford (5009)

## Preliminary Ecological Overview

July 2016

### 1 Introduction

1.1 Aspect Ecology has been appointed to provide ecological input in respect of a potential development site at Holt Road, Horsford. This Briefing Note sets out a preliminary ecological overview of the site, likely constraints, and the ecological deliverability of potential development of this site. This initial assessment is based on the results of a desktop study of free resources (including MAGIC and the Woodland Trust Database), and a review of aerial photography. A full desktop study is currently being undertaken and records from Norfolk Biodiversity Information Service (NBIS) are pending.

### 2 Overview of the Ecological Status of the Site

Ecological Designations	
Likely Constraint	Low
Notes	<p>No statutory nature conservation designations are present within or immediately adjacent to the site. A number of international statutory designations are present within 15 km of the site, including: Broadland Special Protection Area (SPA) and Ramsar Site, Norfolk Valley Fens Special Area of Conservation (SAC), River Wensum SAC, and The Broads SAC. The site does not fall within any relevant Impact Risk Zones for Sites of Special Scientific Interest (SSSIs).</p> <p>The most likely constraints would relate to potential effects from increased recreational pressure and water quality issues. Likely significant effects could most likely be ruled out with provision of high quality green space within the proposed development and a well-designed Sustainable Drainage System (SuDS), see section 3 below.</p>

Site Description	
Likely Constraint	Low
Notes	<p>The site is situated adjacent to the main road for Horsford Village: Holt Road, to the south of Horsford. The site is situated close to existing residential development and a road; otherwise it is largely surrounded by farmland which appears to be under mostly arable production with associated hedgerows. A number of areas of woodland are also in the surrounds of the site.</p> <p>The site appears to comprise two fields (potentially one arable and one semi-improved grassland) with a small strip of woodland and a number of buildings associated with a poultry farm. Hedgerows and associated standard trees border</p>

	<p>the fields, some of which are possibly mature in nature. No ponds appear to be present within 250 m of the site.</p> <p>Habitats of elevated value that would constrain potential development are woodland, hedgerows and associated trees, and any areas of species-rich grassland should they be present.</p>
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### 3 Ecological Deliverability

#### Statutory Designations – no significant constraints currently anticipated

- 3.1 The Joint Core Strategy (JCS) for Greater Norwich (adopted March 2011) includes specific measures in relation to developments likely to have an adverse impact on the Broadland SPA / Ramsar site and The Broads SAC. Policy 18 states that:

*“Harmful impacts will be avoided, for example through the provision of informal open space and attractions that complement the attractions of the Broads area and prevent excess visitor pressure”*

- 3.2 Currently, policy 15 of the JCS identifies Horsford as a ‘service village’, within which allocations for small-scale housing growth are to be allocated, although the ‘Broadland smaller sites in the NPA’ allowance (Policy 9) may permit larger proposals.
- 3.3 The Habitats Regulations Assessment (HRA) undertaken of the JCS<sup>1</sup> concludes that no likely significant effects on international designations is likely achievable through mitigation designed to reduce visitor pressure and safeguard against adverse impacts on water quality (e.g. implementation of well-designed SuDS). Consequently, it is considered that potential effects on nearby statutory designations resulting from an increase in recreational pressure would be minimal, and can be mitigated by the provision of well-designed open space.
- 3.4 As such, based on this initial assessment, no significant constraints from statutory designations are currently anticipated which may affect deliverability of development of this site. It should be noted that information on non-statutory designations is pending from NBIS.

#### Habitats and Fauna – no significant constraints currently anticipated

- 3.5 Based on this initial assessment, potential constraints have been identified at this stage in relation to habitats; however, these constraints are largely limited to boundary features and it is therefore anticipated that affecting these features significantly can be avoided.
- 3.6 The majority of the site appears to comprise habitats of limited ecological value (i.e. arable land) for which there are few inherent constraints in terms of habitats. Effects on other habitats (for example temporary and permanent losses) can be mitigated by retaining and safeguarding the majority of key habitats such as the woodland, hedgerows, and associated trees, and any areas of species-rich grassland should they be present. Retained habitats should not abut residential gardens and should be accessible by management teams for ongoing ecologically-sensitive management. Alternatively, mitigation for a number of small losses of these habitats may be achieved through the creation of new habitats. In accordance with the NERC Act, incorporating habitat creation/enhancements (such as creation of flower-rich grassland),

<sup>1</sup> Greater Norwich Development Partnership (2010). *Habitats Regulation Assessment: Joint Core Strategy for Broadland, Norwich and South Norfolk*. Mott MacDonald.

utilisation of native species in soft landscaping, and appropriate siting of areas of open space to buffer key habitats from areas of built development will benefit ecological deliverability.

- 3.7 Based on this initial assessment, in terms of fauna, the site potentially offers opportunities for nesting birds, roosting bats (trees and buildings), foraging / commuting bats, and reptiles. Recommendations for further survey work on the aforementioned species will require clarification on completion of a Phase 1 Habitat Survey. However, it is considered that, in the event protected species are present, mitigation would be highly achievable through retention of the aforementioned habitats, selective timing of works, and licence applications where required.

#### **4 Summary**

- 4.1 With sensitive design, it is considered the site would be safely developed without significant ecological harm. Sensitive design will involve incorporating retention and, where appropriate, buffering of habitats of ecological value such as the woodland strip, hedgerows, and trees and provision of accessible green infrastructure for new residents. To avoid potential effects of nearby statutory designations, an effective SuDS would be required for the development.

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**Greater Norwich Local Plan:  
Call for Sites**

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**Supporting Representation:  
Green Infrastructure Strategy**

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**July 2016**

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## Issue Sheet

Supporting Representation:  
Green Infrastructure Strategy

July 2016

Prepared by:

Signature:

Name: Ian Reilly

Title: Senior Planner

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Date: 08 July 2016

Approved by:

Signature:

Name: Philip Atkinson

Title: Director

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Date: 08 July 2016

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## **1 Introduction and Background**

### **1.1 Instruction**

1.1.1 Lanpro Services have been instructed to promote 18 strategic sites through the Greater Norwich Local Plan process.

1.1.2 As part of this instruction Lanpro Services have prepared separate representations on each site, however it was considered beneficial to also provide an overview of the strategic green infrastructure theme which has driven the identification and design of the sites.

### **1.2 Natural Environment and Rural Communities Act (2006)**

1.2.1 Section 40 of the Natural Environment and Rural Communities Act 2006, places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. A key purpose of this duty is to embed consideration of biodiversity as an integral part of policy and decision making throughout the public sector.

1.2.2 Section 40(1) imposes a duty to conserve biodiversity:

*Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.*

1.2.3 Section 40(3) of the Act explains that:

*Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.*

1.2.4 Therefore, the duty applies to all local authorities and extends beyond just conserving what is already there to carrying out, supporting and requiring actions that may also restore or enhance biodiversity.

### **1.3 Natural England 'Nature Nearby' Accessible Natural Greenspace Guidance (2010)**

1.3.1 Released in 2010, Natural England's most up to date advice on accessible natural greenspace, this document detailed the social, economic and environmental importance of providing GI.

1.3.2 Natural England recognised that access to the natural environment through local green spaces varies widely across the country, and even within a single local authority area.

1.3.3 Natural England produced Accessible Natural Greenspace Standards (ANGSt) which it advised should be adopted by Local Authorities. It was envisaged that the adoption of ANGSt would redress imbalances in GI availability in local communities.

1.3.4 ANGSt recommends that everyone, wherever they live, should have an accessible natural greenspace:

- of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home;
- at least one accessible 20 hectare site within two kilometres of home;
- one accessible 100 hectare site within five kilometres of home; and
- one accessible 500 hectare site within ten kilometres of home; plus
- a minimum of one hectare of statutory Local Nature Reserves per thousand population.

### **1.4 The Natural Environment White Paper (2011)**

1.4.1 The Government's Natural Environment White Paper, The Natural Choice: Securing the Value of Nature, refers to the role of planning in protecting and improving the natural environment and facilitating coherent and resilient ecological networks that reflect the value of natural systems.

1.4.2 Planning is considered to be a key element of the institutional framework that will achieve the objectives set out in the White Paper. The aims of the White Paper include halting biodiversity loss by 2020, supporting 'healthy functioning ecosystems', and establishing 'coherent ecological networks'.

1.4.3 The White Paper refers to the role of urban GI as completing 'the links in our national ecological network' and 'one of the most effective tools available to us in managing environmental risks such as flooding and heat waves'. It advocates that green spaces should be factored into the development of all communities.

## **1.5 DEFRA - Biodiversity 2020 (2011)**

1.5.1 Department for Environment, Food and Rural Affairs (DEFRA) Biodiversity 2020 is a national strategy for England's wildlife and ecosystem services; it was published in summer 2011. It sets out the Government's ambition to halt overall loss of England's biodiversity by 2020, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.

1.5.2 The reform of the planning system was identified as key to reducing environmental pressure from planning and development, by taking 'a strategic approach to planning for nature' and by retaining 'the protection and improvement of the natural environment as core objectives of the planning system'. Priority action 3.4 of the Biodiversity Strategy sets out how the approach of the planning system will guide development to the best location, encourage greener design, and enhance natural networks.

## **1.6 NPPF (2012) and PPG**

1.6.1 Central Government planning guidance contained in the NPPF advises that there are three dimensions to sustainable development; economic, social and environmental. The key to providing sustainable development is to ensure that all three are considered within planning decisions and plan making.

1.6.2 The NPPF (paras 6 and 17) identifies sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a 'core planning principle'. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan and decision-making, can be found throughout the document, specifically in relation to GI (para. 99) and evidence-gathering (paras 165-168).

1.6.3 Paragraph 9 of the NPPF advises that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):

- making it easier for jobs to be created in cities, towns and villages;
- moving from a net loss of bio-diversity to achieving net gains for nature;
- replacing poor design with better design;
- improving the conditions in which people live, work, travel and take leisure; and
- widening the choice of high quality homes.

1.6.4 The objectives for the natural environment within the planning system are set out in the NPPF (in para. 109) and state that the 'planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;

- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

- 1.6.5 The NPPF clearly supports the objectives set out in the Natural Environment White Paper by stressing a proactive and strategic approach to planning for the natural environment. The ambition of the NPPF is not just to retain protection for existing designations, but to plan ahead for re-creation of habitat where possible. The NPPF states (para. 114) that local planning authorities should 'set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'.
- 1.6.6 Furthermore, the NPPF requires local authorities to 'plan for biodiversity at a landscape scale across local authority boundaries' and 'identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation' (para. 117).
- 1.6.7 The NPPF and Planning Practice Guidance define Green Infrastructure (GI) as a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
- 1.6.8 Green Infrastructure (GI) is therefore an integral part of the sustainable development goal. GI ensures that there are net gains for biodiversity and that conditions are improved for leisure.
- 1.6.9 The creation of, and protection of, existing high quality publically accessible GI also adds value to the attractiveness of a location for business investment and for house builders.
- 1.6.10 It is a key requirement of the NPPF for Local Authorities to consider the role of GI within their plan making and decision taking; failure to do so would result in outcomes which could not be considered as sustainable development.
- 1.6.11 The NPPF is the first part of the planning vehicle to implement the requirements of Section 40 of the Natural Environment and Rural Communities Act 2006 and the aims of The Natural Environment White Paper (2011).
- 1.6.12 To find any part of a Development Plan sound it must fully reflect the policies of the NPPF. Therefore, GI and biodiversity requirements need to be filtered through to Local Authority development plan documents and act as a core consideration within decision taking and plan making.
- 1.6.13 The National Planning Policy Guidance (NPPG) defines Green Infrastructure as:  
*.....a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.*  
*Green infrastructure is not simply an alternative description for conventional open space. As a network it includes parks, open spaces, playing fields, woodlands, but also street trees, allotments and private gardens. It can also include streams, canals and other water bodies and features such as green roofs and walls.*
- 1.6.14 The NPPG highlights that Green Infrastructure is important to the delivery of high quality sustainable development, alongside other forms of infrastructure such as transport, energy, waste and water.

- 1.6.15 Green Infrastructure is also recognised in the NPPG as providing multiple benefits, notably ecosystem services, at a range of scales, derived from natural systems and processes, for the individual, for society, the economy and the environment.
- 1.6.16 Furthermore the NPPG advises that to ensure that these benefits are delivered, green infrastructure must be well planned, designed and maintained. Green Infrastructure should, therefore, be a key consideration in both local plans and planning decisions.
- 1.6.17 The NPPG provides further clarification on how successful GI can help to deliver wider planning policy:

***Building a strong, competitive economy***

*Green infrastructure can drive economic growth and regeneration, helping to create high quality environments which are attractive to businesses and investors.*

***Delivering a wide choice of high quality homes***

*Green infrastructure can help deliver quality of life and provide opportunities for recreation, social interaction and play in new and existing neighbourhoods. More broadly, green infrastructure exists within a wider landscape context and can reinforce and enhance local landscape character, contributing to a sense of place. Green infrastructure is also an important approach to delivering ecosystem services and ecological networks.*

***Requiring good design***

*Well-designed green infrastructure helps create a sense of place by responding to, and enhancing, local landscape character. Green infrastructure can also help create safe and accessible environments in new development and the regeneration of brownfield sites in existing built up areas.*

***Promoting healthy communities***

*Green infrastructure can improve public health and community wellbeing by improving environmental quality, providing opportunities for recreation and exercise and delivering mental and physical health benefits. Green infrastructure also helps reduce air pollution, noise and the impacts of extreme heat and extreme rainfall events.*

***Meeting the challenge of climate change, flooding and coastal change***

*Green infrastructure can help urban, rural and coastal communities mitigate the risks associated with climate change and adapt to its impacts by storing carbon; improving drainage (including the use of sustainable drainage systems) and managing flooding and water resources; improving water quality; reducing the urban heat-island effect and; where appropriate, supporting adaptive management in coastal areas. Green infrastructure networks also help species adapt to climate change by providing opportunities for movement.*

***Conserving and enhancing the natural environment***

*The components of green infrastructure exist within the wider landscape context and should enhance local landscape character and contribute to place-making. High quality networks of multifunctional green infrastructure provide a range of ecosystem services and can make a significant contribution to halting the decline in biodiversity.*

## **2 Growth Considerations**

### **2.1 SHMA**

- 2.1.1 The Central Norfolk Strategic Housing Market Assessment (SHMA) issued in December 2015 identifies a Core Housing Market Area, a Greater Norwich Housing Market Area and a Central Norfolk Housing Market Area.

- 2.1.2 The SHMA identifies the objectively assessed need for the partner councils until 2036, ten years beyond the current JCS period.
- 2.1.3 The JCS required for 37,000 homes to be provided by 2026. The SHMA advises that a further 15,000 dwellings will be required between 2026 and 2036 within the districts of Norwich, South Norfolk and Broadland.
- 2.1.4 North Norfolk and Breckland Council are currently in the early stages of their Local Plan process, their plan periods will run from 2012 until 2036. The SHMA advises that the growth required in those districts will be circa 25,000 dwellings in that period.

## **2.2 Natura 2000 sites**

- 2.2.1 Natura 2000 sites are considered to be Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and RAMSAR sites (internationally important wetland sites). It is a requirement of the Sustainability Appraisal, Habitats Regulations Assessment and Appropriate Assessment to consider the direct and indirect effects of population growth upon the integrity of these sites.
- 2.2.2 A major consideration of population growth is the visitor pressures placed on publically accessible Natura 2000 sites. These recreational pressures have been considered previously through the adoption of the JCS and the Norwich, South Norfolk and Broadland Council Local Plans. Many of the Natura 2000 sites had been scoped out through the sustainability appraisal scoping process as unlikely to be detrimentally impacted upon by the growth projections.
- 2.2.3 On-site open space provision, delivery of strategic GI through investment and specific allocations such as South Norfolk's Bawburgh Lakes site had been considered sufficient to mitigate against any impacts which were considered possible on those vulnerable Natura 2000 sites.
- 2.2.4 In Broadland the onsite open space policy requirements are considered by many developers to be onerous and at risk of making schemes unviable. The open space requirements which the Council are seeking are a direct result of concerns raised by Natural England regarding impacts on Natura 2000 sites.
- 2.2.5 South Norfolk Council are reliant on a strategy of creating access to the open countryside to ensure that population pressures do not impact negatively on protected sites. This strategy does not take into account that the open countryside is out of their control in terms of accessibility and quality of recreational standard, it also assumes that the average resident is fully aware of the rural footpath network. It should also be noted that the delivery of circa 70ha of publically accessible open space at the Bawburgh Lakes site has not made any progress in over ten years.
- 2.2.6 The strategies detailed above were devised to ensure that the Natura 2000 sites which had not been scoped out from the relevant sustainability appraisals would be protected. However, it is unclear if the scoping exercise undertaken by the Councils took account of the existing deficiency in natural and semi natural public open space which was evidenced in each Councils PPG17 study from 2007.
- 2.2.7 For example, the South Norfolk PPG17 study found that there were large scale deficiencies in the supply of publically accessible Natural and Semi-Natural Greenspace, specifically 200ha in the north west and south west of the District
- 2.2.8 The sustainability appraisal Scoping Report which accompanies the Call for Sites provides an understanding that there is a need to protect and enhance nationally and internationally protected nature conservation interests and geodiversity sites in and adjacent to the area, with particular emphasis on reducing visitor pressure on and improving water quality in Natura 2000 sites and the wider habitats of the Broads.
- 2.2.9 However, the scoping report repeats the oversight of the previous SA's undertaken for the Local Plan process. There is no acknowledgement that the visitor pressures from new development could be occurring because there is insufficient alternative natural greenspace available on site or close to their site due to the delivery of strategic GI not coming forward. This would

compound the evidenced existing problem of open space deficiencies which have not been identified or addressed correctly through the JCS, South Norfolk Local Plan or Broadland Local Plan.

2.2.10 Councils are not supplying sufficient accessible natural greenspace with a variety of environments to satisfy the visitor demands on Natura 2000 sites; which will increase further due to the proposed growth between now and 2036.

2.2.11 Therefore, it is considered that the scoping of impacts upon the Natura 2000 sites through the Appropriate Assessment, Sustainability Appraisal and Habitats Regulations Assessment needs to demonstrate that there is an understanding of the current open space deficiencies to ensure that the in combination effects of the projected growth plans are fully understood.

## **2.3 SANG**

2.3.1 It is understood that Natural England consider there to be a 7.5km catchment area for publically accessible Natura 2000 sites. Therefore, increased visitor pressures which result from population growth within the 7.5km catchment area need to be considered within the scoping/sustainability exercise which accompanies the next iteration of the plan making process.

2.3.2 At present the spatial distribution of the projected growth is not fixed however what is known is that the designated sites have a catchment area which spreads across the majority of the three partner Council's areas.

2.3.3 Given the existing deficit in publically accessible natural and semi natural open space within Broadland and South Norfolk, the unsustainable/undeliverable mitigation being promoted through the respective Local Plans and the projected growth of the SHMA Councils it is apparent that suitable alternative natural greenspace (SANG) will need to be sought to avoid negative impacts being experienced at Natura 2000 sites.

2.3.4 The need for a variety of SANG's to be provided can be traced back to the evidence of the PPG17 studies carried out by the respective Council partners. These studies detailed that a range of opens spaces of natural and semi-natural open space needed to be provided for the district Councils to meet Natural England's ANGST recommendations.

2.3.5 These new spaces need to offer a variety of environments, provide for a range of walks, allow for car parking at the larger sites, and be located within the 7.5km Natura 2000 catchment area to provide for a successful SANG.

2.3.6 The long term management of the SANG can be offered to a variety of interested bodies ie Parish Council, District Council or Norfolk Wildlife Trust or it could be through a private management agreement.

## **3 Proposed Sites**

### **3.1 Strategic Locations**

3.1.1 Lanpro have been working with our clients to identify and secure sites which are within and adjacent to the NPA. These sites have been identified as they are within the buffer zone of the Norfolk Natura 2000 sites, they provide connections/enhancements to the JCS identified GI corridors and they are within easy reach of growth locations.

3.1.2 The mapping exercise which we have undertaken shows the quantum of GI which we are offering to act as SANG's in or adjacent to strategic growth locations. We would anticipate that these same locations will experience more growth through the new Greater Norwich Local Plan.

3.1.3 The plans detail clearly that all of our promoted sites are within the Natura 2000 buffer zones and when compared to the JCS Key diagram and GI corridor maps our sites have the potential to offer a range of opportunities for the Greater Norwich Local Plan.

## **3.2 Sustainable Developments**

- 3.2.1 The provision of high quality GI within each promoted site has been given careful consideration. The GI will act as a benefit for the development and the surrounding locality in terms of its use, but we have also given consideration to the form of the development and its interaction with the wider landscape setting and characteristics.
- 3.2.2 The provision of GI at a rate which may be higher than the current policy requirements provides for opportunities to create high quality design outcomes in built and natural form terms.
- 3.2.3 The quantum of housing proposed at each site is appropriate to the size of the settlement which it would be related to. The biodiversity benefits which could also be introduced would ensure that each development truly provided for a net gain for the natural environment.
- 3.2.4 The developments can provide social gains through increased recreational and sporting opportunities which also lead to social inclusion gains.
- 3.2.5 The NPPG recognises that the provision of high quality GI can result in economic benefits for an area as it attracts investment in both housing and business.
- 3.2.6 The provision of these sites as proposed will ensure that the future growth plans for the Greater Norwich area will be more resilient to the potential for recreational pressures to impact on vulnerable designated and non-designated sites. Across the 18 sites 143ha of public open space can be created.

## **3.3 Deliverable and viable**

- 3.3.1 As detailed on all of the separate submission forms we consider all of the promoted sites to be deliverable and viable. Detailed viability information can be provided but as stated in this representation previously Lanpro and their clients have identified and secured these promoted sites on the basis that the Greater Norwich area is in need of SANG's.
- 3.3.2 The majority of these sites can be taken forward immediately and the Greater Norwich Local Plan is therefore in a position to front load the provision of necessary GI to offset the recreational pressures which may occur through population growth, especially in the post 2026 period.

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**Greater Norwich Local Plan:  
Call for Sites**

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**Supporting Representation:  
Green Infrastructure Strategy**

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**Appendix 1 –  
Sites Location**

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Note

SUMMARY

-  Norwich Policy Area
-  Existing Urban Areas
-  Proposed Sites

Area of Green Infrastructure

1. Sandhole Lane Park	5.83 Ha
2. Norwich Road Park I	6.37 Ha
3. Norwich Road Park II	5.09 Ha
4. Old Norwich Road Park	8.95 Ha
5. Holt Road Park	1.32 Ha
6. Rackheath Country Park	31.78 Ha
7. Poringland Road Park	1.02 Ha
8. Mulbarton Road Park	9.81 Ha
9. Little Melton Green Area	0.07 Ha
10. Little Melton Green Area	0.22 Ha
11. New Road Park I	3.08 Ha
12. New Road Park II	3.14 Ha
13. Caistor Country Park	24.47 Ha
14. Caistor Road Park	3.03 Ha
15. Barford Country Park	28.95 Ha
16. Long Lane Park	4.32 Ha
17. Brooke Green Area	0.76 Ha
18. Frettenham Park	4.80 Ha
<b>Total</b>	<b>143.01 Ha</b>

Map Data © Google 2015

PROJECT TITLE  
Norwich Policy Area Green Infrastructure Strategy

PROJECT NUMBER  
GLA 001-0635

CLIENT

DRAWING TITLE  
Sites Location

DRAWING NUMBER REV  
001 -

SCALE  
1/150000 (A3)

DATE  
JUNE 2016

DRAWN BY  
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001 Site Location  
1/150000 (A3)

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**Greater Norwich Local Plan:  
Call for Sites**

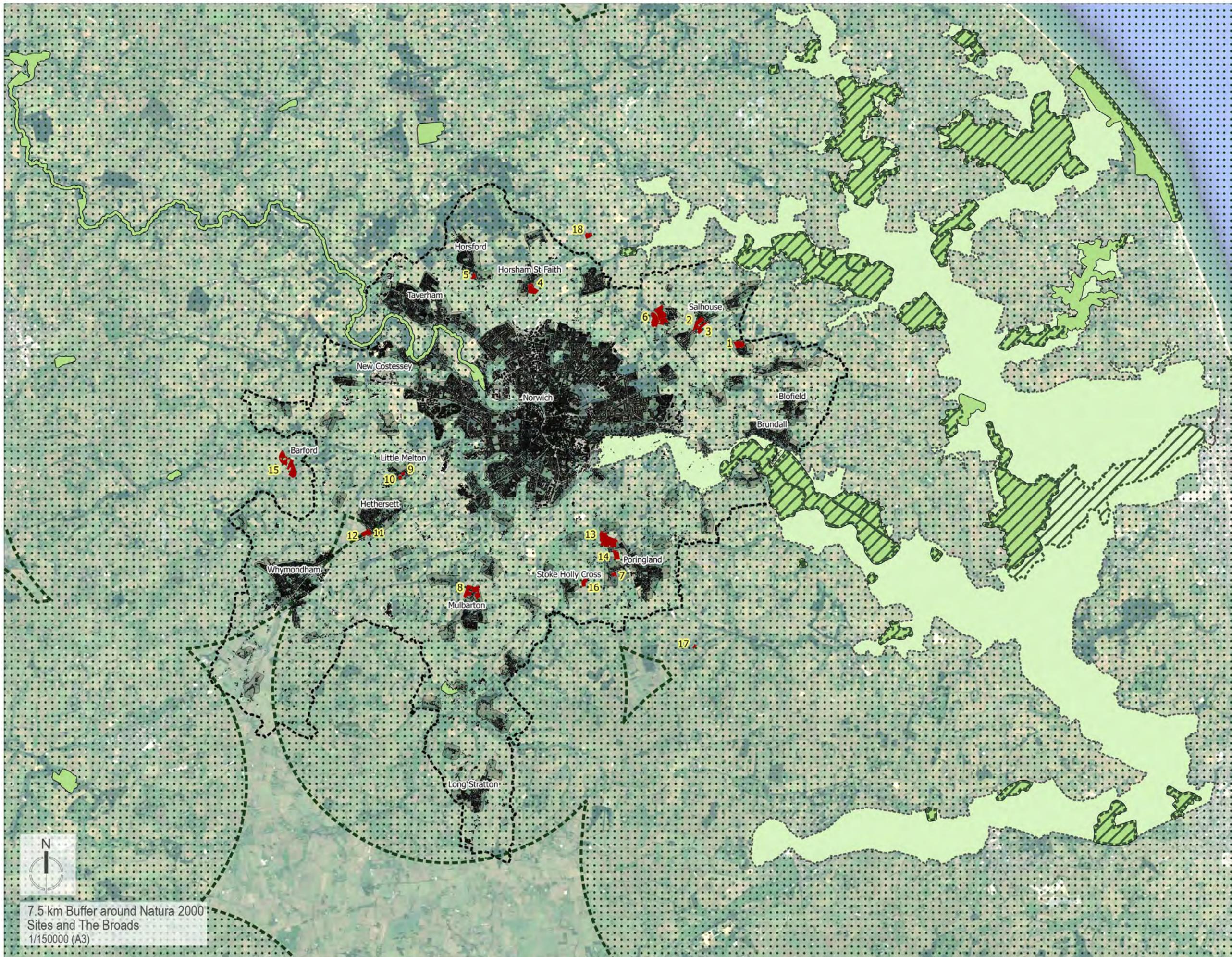
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**Supporting Representation:  
Green Infrastructure Strategy**

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**Appendix 2 –  
7.5 km Buffer around  
Natura 2000 Sites and The Broads**

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Note

SUMMARY

-  Norwich Policy Area
-  Existing Urban Areas
-  Proposed Sites
-  Special Protection Areas
-  Special Area of Conservation
-  The Broads
-  7.5 Km Buffer around SAC, SPA & The broads

Map Data © Google 2015

PROJECT TITLE  
Norwich Policy Area Green  
Infrastructure Strategy

PROJECT NUMBER  
GLA001-0635

CLIENT

DRAWING TITLE  
7.5 km Buffer around Natura  
2000 Sites and The Broads

DRAWING NUMBER REV  
002 -

SCALE  
1/150000 (A3)

DATE  
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7.5 km Buffer around Natura 2000  
Sites and The Broads  
1/150000 (A3)

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**Greater Norwich Local Plan:  
Call for Sites**

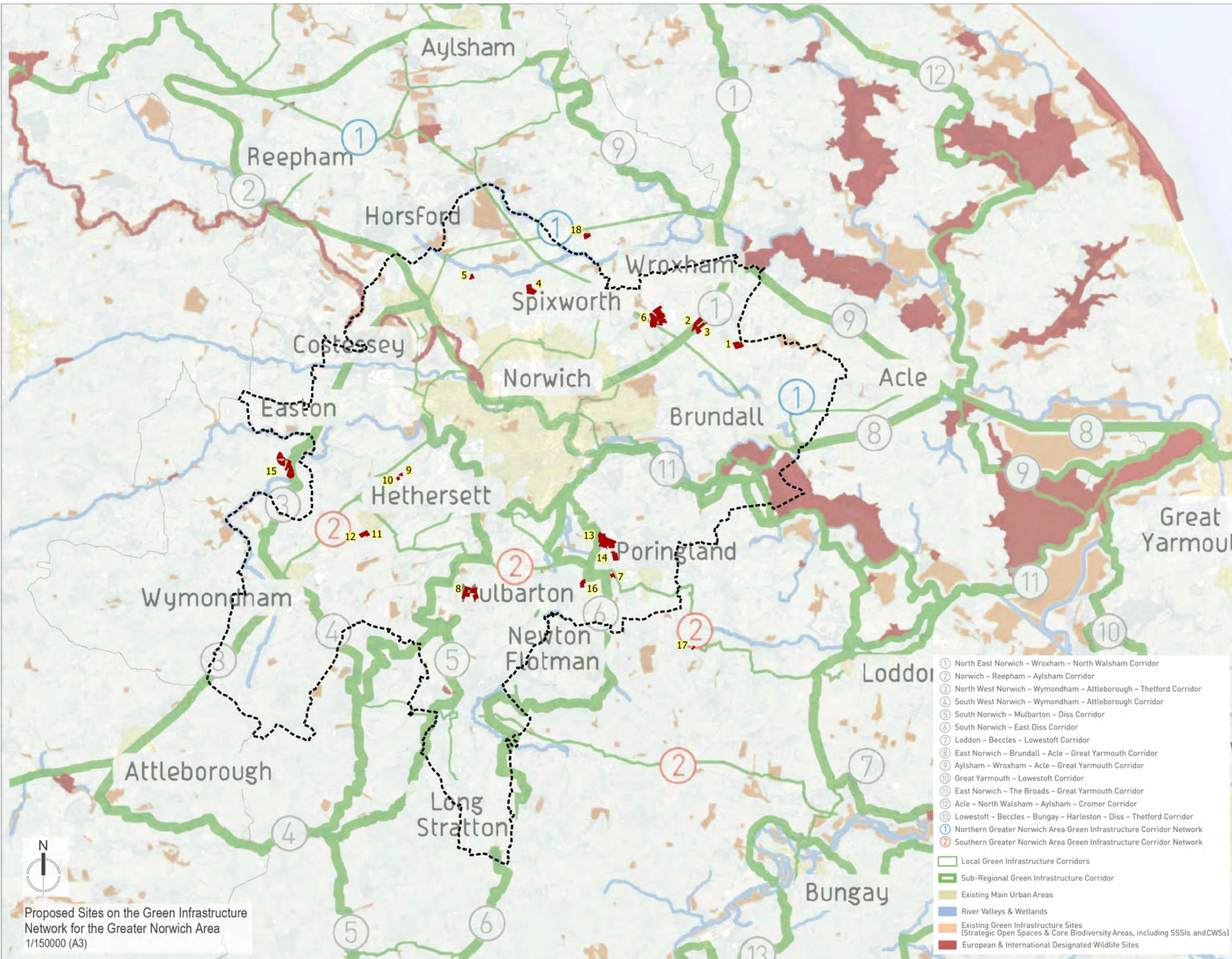
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**Supporting Representation:  
Green Infrastructure Strategy**

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**Appendix 3 -  
Proposed Sites on the GI Network for  
the Greater Norwich Area**

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Proposed Sites on the Green Infrastructure Network for the Greater Norwich Area  
1/150000 (A3)

Note

SUMMARY

- Norwich Policy Area
- Proposed Sites

The Map of the Green Infrastructure Network for the Greater Norwich Area has been extracted from the Joint Core Strategy for Norwich, Broadland, and South Norfolk (2014).

Map Data © Google 2015

PROJECT TITLE  
Norwich Policy Area Green Infrastructure Strategy

PROJECT NUMBER  
GLA001-0635  
CLIENT

DRAWING TITLE  
Proposed Sites on the Green Infrastructure Network for the Greater Norwich Area

DRAWING NUMBER REV  
003 -

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1/150000 (A3)

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- ① North East Norwich – Wroxham – North Walsham Corridor
  - ② Norwich – Reepham – Aylsham Corridor
  - ③ North West Norwich – Wymondham – Attleborough – Thetford Corridor
  - ④ South West Norwich – Wymondham – Attleborough Corridor
  - ⑤ South Norwich – Mulbarton – Diss Corridor
  - ⑥ South Norwich – East Diss Corridor
  - ⑦ Loddon – Beccles – Lowestoft Corridor
  - ⑧ East Norwich – Brundall – Acle – Great Yarmouth Corridor
  - ⑨ Aylsham – Wroxham – Acle – Great Yarmouth Corridor
  - ⑩ Great Yarmouth – Lowestoft Corridor
  - ⑪ East Norwich – The Broads – Great Yarmouth Corridor
  - ⑫ Acle – North Walsham – Aylsham – Cromer Corridor
  - ⑬ Lowestoft – Beccles – Bungay – Harleston – Diss – Thetford Corridor
  - ① Northern Greater Norwich Area Green Infrastructure Corridor Network
  - ② Southern Greater Norwich Area Green Infrastructure Corridor Network
- Local Green Infrastructure Corridors
  - Sub-Regional Green Infrastructure Corridor
  - Existing Main Urban Areas
  - River Valleys & Wetlands
  - Existing Green Infrastructure Sites [Strategic Open Spaces & Core Biodiversity Areas, including SSSIs and CWSs]
  - European & International Designated Wildlife Sites

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**Greater Norwich Local Plan:  
Call for Sites**

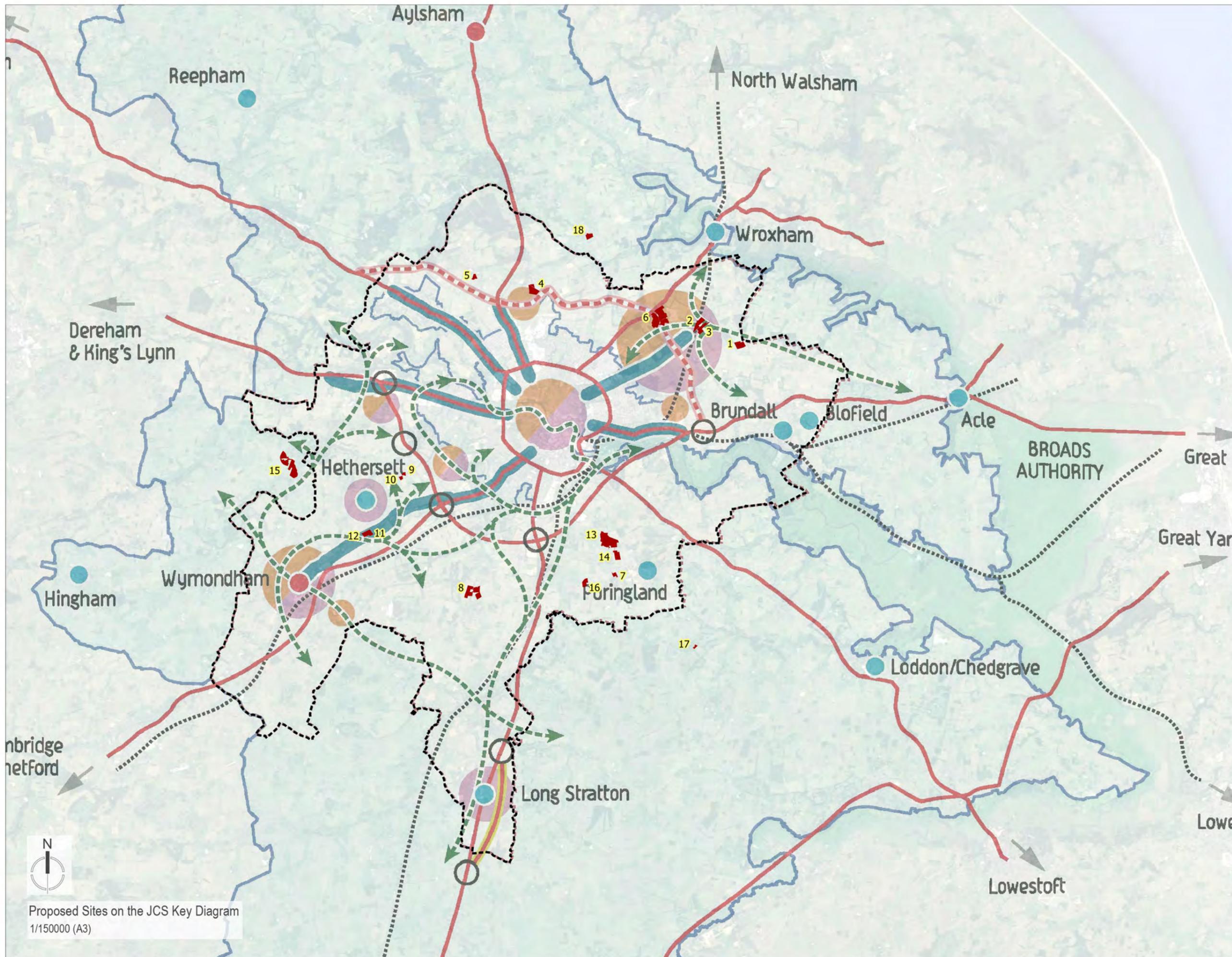
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**Supporting Representation:  
Green Infrastructure Strategy**

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**Appendix 4 -  
Proposed Sites on the  
JCS Key Diagram**

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- Note**
- SUMMARY**
- Proposed Sites
  - Joint Core Strategy Area
  - Norwich Policy Area
  - Norwich Urban Area
  - Broads Authority Area
  - Strategic Employment Sites
  - Major Housing Growth & Associated Facilities
  - Norwich Northern Distributor Road
  - Long Stratton Bypass
  - Major Junction Improvements
  - Bus Rapid Transit Corridor
  - Green Infrastructure Priority Corridors supporting key growth locations (Other Green Infrastructure opportunities throughout the area)
  - Main Towns
  - Key Service Centres
  - A Roads
  - Railways

The JCS Key Diagram Map has been extracted from the Joint Core Strategy for Norwich, Broadland, and South Norfolk (2014).  
 Map Data © Google 2015

**PROJECT TITLE**  
 Norwich Policy Area Green Infrastructure Strategy

**PROJECT NUMBER**  
 GLA001-0635

**CLIENT**

**DRAWING TITLE**  
 Proposed Sites on the JCS Key Diagram

**DRAWING NUMBER**    **REV**  
 004                            -

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Proposed Sites on the JCS Key Diagram  
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