

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

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

E-mail: callforsites@gnlp.org.uk

Telephone: 01603 306603

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

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

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

2. Site Details	
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)	

Site Ownership		
3a. I (or my client)....		
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
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).		
3c. If the site is in multiple landownerships do all landowners support your proposal for the site?	Yes	No
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.		

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

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

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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.

--

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

--

Local Green Space

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.

6a. Which community would the site serve and how would the designation of the site benefit that community.

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6b. Please describe why you consider the site to be of particular local significance e.g. recreational value, tranquillity or richness in wildlife.
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Site Features and Constraints

Are there any features of the site or limitations that may constrain development on this site (please give details)?
--

7a. Site Access: 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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7b. Topography: Are there any slopes or significant changes of in levels that could affect the development of the site?
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7c. Ground Conditions: Are ground conditions on the site stable? Are there potential ground contamination issues?
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7d. Flood Risk: 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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7e. Legal Issues: 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?

--

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.

--

7j. Other: (please specify):

--

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):	
8b. Please provide any further information on the utilities available on the site:	

Availability	
9a. Please indicate when the site could be made available for the land use or development proposed.	
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)	
9b. Please give reasons for the answer given above.	

Market Interest		
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.		
	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		

Delivery	
11a. Please indicate when you anticipate the proposed development could be begun.	
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)	
11b. Once started, how many years do you think it would take to complete the proposed development (if known)?	

Viability			
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 & Children's Play Space and Community Infrastructure Levy			
	Yes	No	Unsure
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?			
12c. If there are abnormal costs associated with the site please provide details:			
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?			

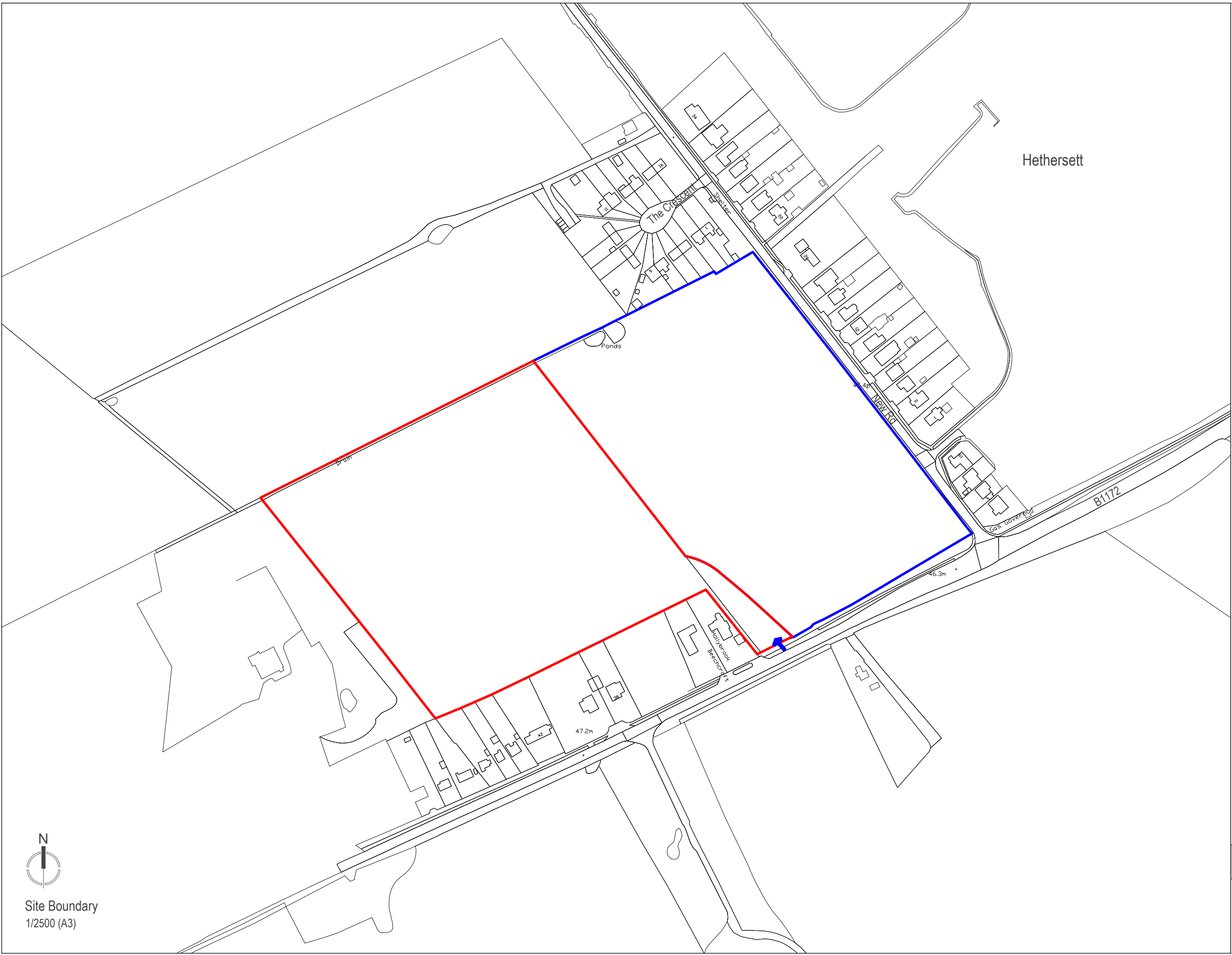
12e. Please attach any viability assessment or development appraisal you have undertaken for the site, or any other evidence you consider helps demonstrate the viability of the site.

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

Check List	
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	

14. Declaration	
<p>I understand that:</p> <p>Data Protection and Freedom of Information</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"> • To assist in the preparation of the Greater Norwich Local Plan • To contact you, if necessary, regarding the answers given in your form. • To evaluate the development potential of the submitted site for the uses proposed within the form. <p>Disclaimer</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



Note

SUMMARY

- Land Ownership
- Site Boundary
- ➔ Access

Site Area 4.82 Ha

Hethersett

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Ordnance Survey Licence
Number 0100031673

PROJECT TITLE
New Road, Hethersett II

PROJECT NUMBER
LAN001-0451

DRAWING TITLE
Site Boundary

DRAWING NUMBER	REV
001	-

SCALE
1/2500 (A3)

DATE
JUNE 2016

DRAWN BY
JBA



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



Site Boundary
1/2500 (A3)



Note

SUMMARY

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

Site Area	4.82 Ha
Net Developable Area	1.31Ha
Gross Housing Density	10 Dw@Ha
Net Housing Density	38 Dw@Ha
No. Houses	50 Houses
Green Infrastructure	3.14 Ha
Green Infrastructure	65%

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PROJECT TITLE
 New Road, Hethersett

PROJECT NUMBER
 LAN001-0451

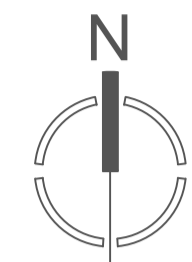
DRAWING TITLE
 Proposal Map

DRAWING NUMBER	REV
001	-

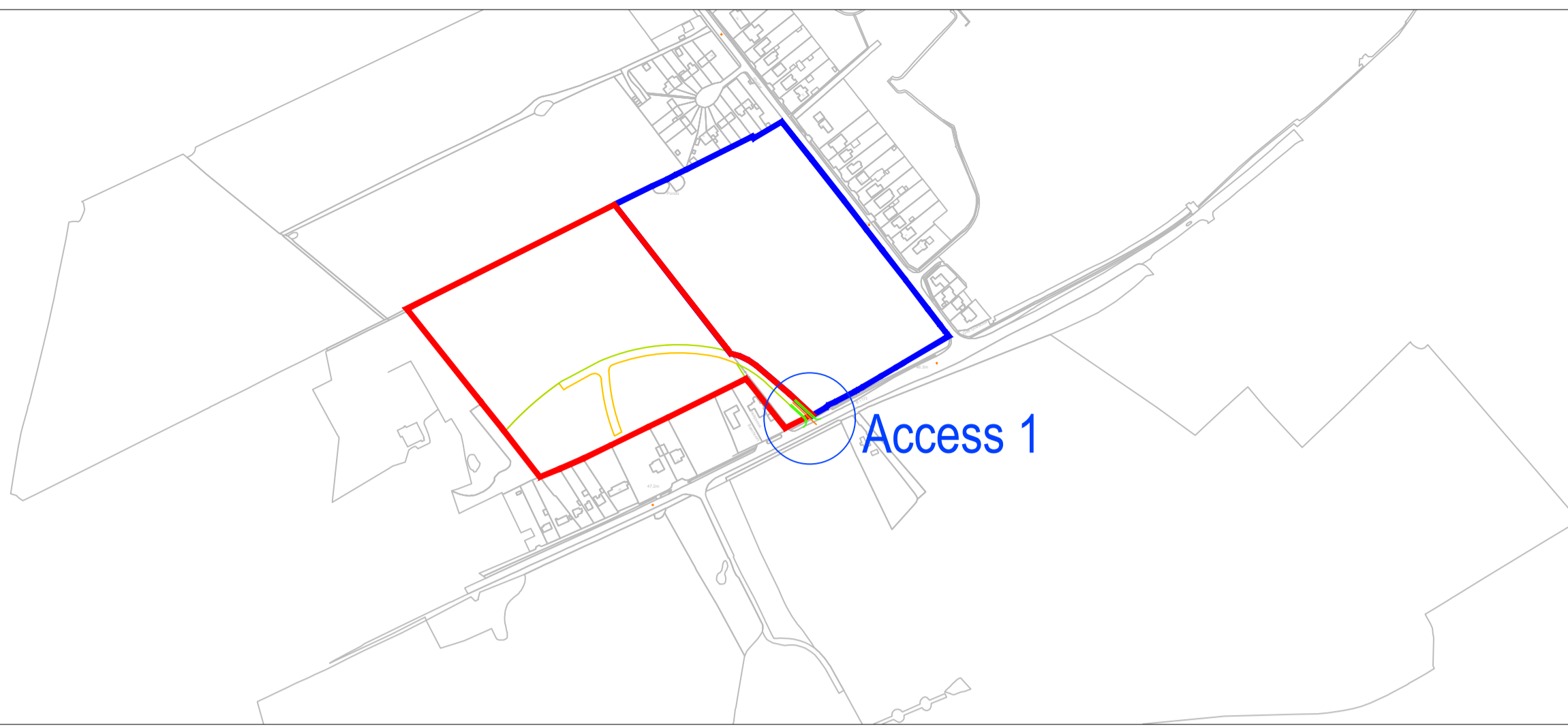
SCALE
 1/2500 (A3)

DATE
 JUNE 2016

DRAWN BY
 JBA



Location Plan
1:5000(A1)



Site Access 1
1:500(A1)

47.2m

Access 1
4.8m carriageway width
2 x 1.5m wide footways

B 1172

46.3m

Gas Gov

Hollybrook
Beechcroft

38

Note

SUMMARY

- Hethersett I
Site Boundary
(Area 4.64 Ha)
- Hethersett II
Site Boundary
(Area 4.82 Ha)
- ▬ Proposed new
1.5m footway
- 2.4m x 0m
visibility splay

PROJECT TITLE
Hethersett II

PROJECT NUMBER
0451

CLIENT

DRAWING TITLE
Site Access Layout

DRAWING NUMBER REV
-

SCALE
1:500 (A1)

DATE
July 2016

DRAWN BY
EAE



[Transport and Travel]

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

September 2015

ECO4393: HETHERSETT, NORFOLK

PRELIMINARY ECOLOGICAL APPRAISAL (CONSTRAINTS, OPPORTUNITIES AND DELIVERABILITY REPORT)

1. INTRODUCTION AND METHODOLOGY

- 1.1. Aspect Ecology has been commissioned by Lanpro to advise in respect of ecological matters at land at Hethersett, Norfolk. To inform proposals for development of the site and identify any ecological constraints and opportunities present, Aspect Ecology has undertaken a preliminary ecological appraisal of the site.
- 1.2. A Phase 1 habitat survey of the site was conducted in August 2014 to record the main habitats and species present, identify any areas of ecological interest and provide an assessment of the potential use of the site by faunal species. In addition, a Phase 2 faunal survey for amphibians has been undertaken. This note provides a summary of the survey findings, focusing on any potential constraints to development that may require consideration, together with opportunities for ecological enhancement.

2. SITE DESCRIPTION

- 2.1. The site is located to the west of Hethersett in Norfolk, and comprises two fields divided by a central drain immediately to the north of Ketts Oak road (B1172) (see Plan 4493/BN1 attached).
- 2.2. Both fields are under arable cultivation, planted with wheat at the time of survey. The site is bounded by hedgerows with associated standard trees, whilst two adjoining ponds are located at the northern site boundary.

3. ECOLOGICAL CONSTRAINTS AND OPPORTUNITIES

3.1. Ecological Designations


- 3.1.1. Information obtained from the online Multi-Agency Geographic Information for the Countryside (MAGIC) resource found that no statutory ecological designations are located within or adjacent to the site. The closest identified statutory ecological designation is Toll's Meadow, Wymondham Local Nature Reserve (LNR), situated approximately 4.3km to the south-west of the site. No European-level designations are located within 5km of the site, although Norfolk Valley Fens Special Area of Conservation (SAC) is located

approximately 7.3km to the south of the site, and River Wensum SAC is located approximately 7.8km to the north.

- 3.1.2. Background information received from Norfolk Biodiversity Information Service (NBIS) indicates that the site is not subject to any non-statutory designations, with the closest non-statutory ecological designation being Smeeth Wood County Wildlife Site (CWS) located approximately 1km to the south of the site. The woodland is also listed as Ancient Woodland (Plantation on Ancient Woodland Site or PAWS), with part of the PAWS extending to the north of the CWS, approximately 825m from the site at its closest point.
- 3.1.3. **Constraints:** No statutory designations are present within the site, whilst the closest designation, Toll's Meadow, Wymondham LNR, is located 4.3km from the site. As such, statutory designations are unlikely to be affected by the proposed development. Notably, the entirety of the site is located outside of Natural England's SSSI Impact Risk Zones for residential development.
- 3.1.4. A number of non-statutory nature conservation designations are located within the surrounds of the site. However, given the small scale of the proposals and subject to the implementation of appropriate mitigation and safeguards, it is considered unlikely that development would result in adverse effects on these designations.
- 3.1.5. **Opportunities:** The proposals represent an opportunity to enhance the retained habitats within the site and for the creation of new habitats to be undertaken, complementing the nearby designations, strengthening buffer habitat and providing overall benefits to such areas through increased ecological connectivity.

3.2. Habitats and Ecological Features

- 3.2.1. The site is dominated by fields under arable cultivation, planted with wheat at the time of survey. These fields support limited ecological interest, being subject to relatively intensive management, although relatively wide grass margins are present (see below).
- 3.2.2. A central drain is present dividing the two fields. This is relatively narrow with steep banks, and was recorded as being heavily encroached with tall ruderal vegetation, being largely dry at the base.
- 3.2.3. Field boundaries are largely formed by hedgerows. These are varied in character, with those adjacent to residential properties (H2 and H3 on Plan 4393/BN1) being well maintained and dominated by Beech, whilst the remaining hedgerows are outgrown in character and support a moderate diversity of woody species. No hedgerows were identified as being species-rich, although the network of hedgerows is of some value within the context of the site. Several mature trees are present associated with the hedgerows.
- 3.2.4. Associated with the boundary hedgerows and central drain are wide margins supporting semi-improved grassland and tall ruderal vegetation. These contain a moderate diversity of grass and herb species, although do not support any particular botanical interest.
- 3.2.5. Two adjoining ponds are present along the northern site boundary, surrounded by scrub and trees (identified as P1 and P2 on Plan 4493/BN1). These are shown as distinct waterbodies on OS mapping, although likely



form a single pond during wet periods. The ponds were recorded to be dry during initial survey in June 2015, although supported a shallow depth of water during the Phase 1 survey in August 2015 (following rainfall). As such, they are likely to form ephemeral waterbodies, being dry for much of the year.

- 3.2.6. **Constraints:** The site is dominated by arable habitat considered to be of low ecological value. Other habitats including the central drain, hedgerows, trees, ponds and grass margins provide some interest within the context of the site, although no habitats were identified as being of high ecological value at the local level. Nevertheless, such habitats are generally restricted to field boundaries and can be largely retained under a sensitive development layout.
- 3.2.7. **Opportunities:** The proposals represent an opportunity to enhance the retained habitats within the site and for the creation of new habitats to be undertaken, such as wildflower grassland, new pond creation and additional woodland and hedgerow planting. The instigation of ecologically favourable management would result in a range of benefits to biodiversity.

3.3. Faunal Species

- 3.3.1. The site provides opportunities for a number of protected faunal species. A discussion of these species and likely further survey and mitigation requirements is detailed below.

Bats

- 3.3.2. A moderate number of mature trees are present within the site, associated with the hedgerow network. A number of these were recorded to support potential bat roosting features including cracks, splits and holes, and have been assessed as Category 2 (moderate-low roosting potential) under Bat Conservation Trust guidance (BCT, 2012). These trees are identified on Plan 4493/BN1.
- 3.3.3. The site may also provide some limited opportunities for foraging and commuting bats associated with the boundary hedgerows, although given the small size of the site it is unlikely to be of importance in a wider context.
- 3.3.4. **Constraints:** Bats and their roosts are protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010 (as amended). A number of mature trees were recorded which may offer some roosting opportunities for bats, although these are largely located at the field margins and can likely be retained under the proposals. Should these trees be affected under the proposals, it is recommended that appropriate safeguards are implemented during works (such as timing restrictions or 'soft felling').
- 3.3.5. Consideration should also be given to foraging and commuting bats in terms of maintenance of habitat corridors along the site margins and sensitive lighting design, although further survey work is not considered necessary given the low value of habitats present.
- 3.3.6. **Opportunities:** The opportunity is present under the proposals to enhance the site for roosting bats. This could take the form of the provision of artificial roosting structures such as bat boxes or bricks, mounted onto retained trees or new buildings. Habitat creation and enhancement measures will also be of

benefit to foraging and commuting bats, maintaining and potentially increasing feeding resources and commuting corridors.

Other mammals


- 3.3.7. No evidence of other protected or notable mammal species was recorded during the survey. Notably, no evidence of Badger was recorded, whilst the site is located outside of the known distribution for Dormouse. The site may however provide some opportunities for mammal species including Hedgehog and Brown Hare.
- 3.3.8. **Constraints:** The site provides some potential habitat for mammal species including Hedgehog and Brown Hare, which are listed as species of principal importance for conservation in England. However, given the small scale nature of the proposals and the abundance of suitable habitat within the site surrounds, it is unlikely such species would be significantly affected, whilst suitable habitat could be retained within areas of open space.
- 3.3.9. **Opportunities:** The proposals represent an opportunity to provide an increased habitat resource for some mammal species, notably Hedgehog, through the creation and enhancement of new habitat areas including wildflower grassland and new tree and hedgerow planting.

Birds

- 3.3.10. The site is likely to provide some opportunities for nesting birds associated with the boundary hedgerows and trees. However, such habitats are limited to the margins of the site.
- 3.3.11. **Constraints:** Consideration should be given to the retention of habitat of value to birds, such as hedgerows and associated trees. However, such habitats can likely be retained at the margins of the development or within open space. All wild birds and their nests receive protection under Section 1 of the Wildlife and Countryside Act 1981 (as amended) in respect of killing and injury, and active nests cannot be taken, damaged or destroyed. As such, should any vegetation need to be removed, it is recommended that any vegetation clearance take place outside of the breeding season (March – August inclusive).
- 3.3.12. **Opportunities:** The opportunity is present to enhance the site for birds through the introduction of beneficial habitat management and artificial nesting opportunities, in the form of bird boxes mounted on trees or buildings, which may attract additional species to the site to breed.

Amphibians

- 3.3.13. A number of waterbodies are present within the site and its immediate surrounds. These were surveyed to determine if they supported water in June 2015, and if water was present, a water sample was taken for analysis of environmental DNA (eDNA) to determine presence/absence of Great Crested Newt. The results of this survey are shown on Plan 4493/BN2.
- 3.3.14. As this indicates, the majority of ponds identified from OS mapping were found to be dry, whilst no evidence of Great Crested Newts was found at the remaining ponds. Ponds P1 and P2 within the site, found to be dry in June 2015, were later found to support a shallow depth of water in August 2015



(following rainfall), although given these appear to be ephemeral ponds and were dry during the breeding season, it is considered they are unlikely to support Great Crested Newts. A background record of Great Crested Newt was received from NBIS located approximately 600m to the north of the site, although this is outside of the typical maximum migration distance of this species. In any event, the majority of the site is considered to provide poor quality terrestrial habitat, being dominated by arable fields.


- 3.3.15. **Constraints:** No evidence of Great Crested Newts was recorded during the survey, whilst background records relating to this species are located outside of the typical maximum migration distance travelled by newts. As such, this species is not considered to form a constraint to the proposals.
- 3.3.16. **Opportunities:** The opportunity exists to enhance the value of the site for amphibian species, through the creation and enhancement of aquatic habitat and associated high quality terrestrial habitat.

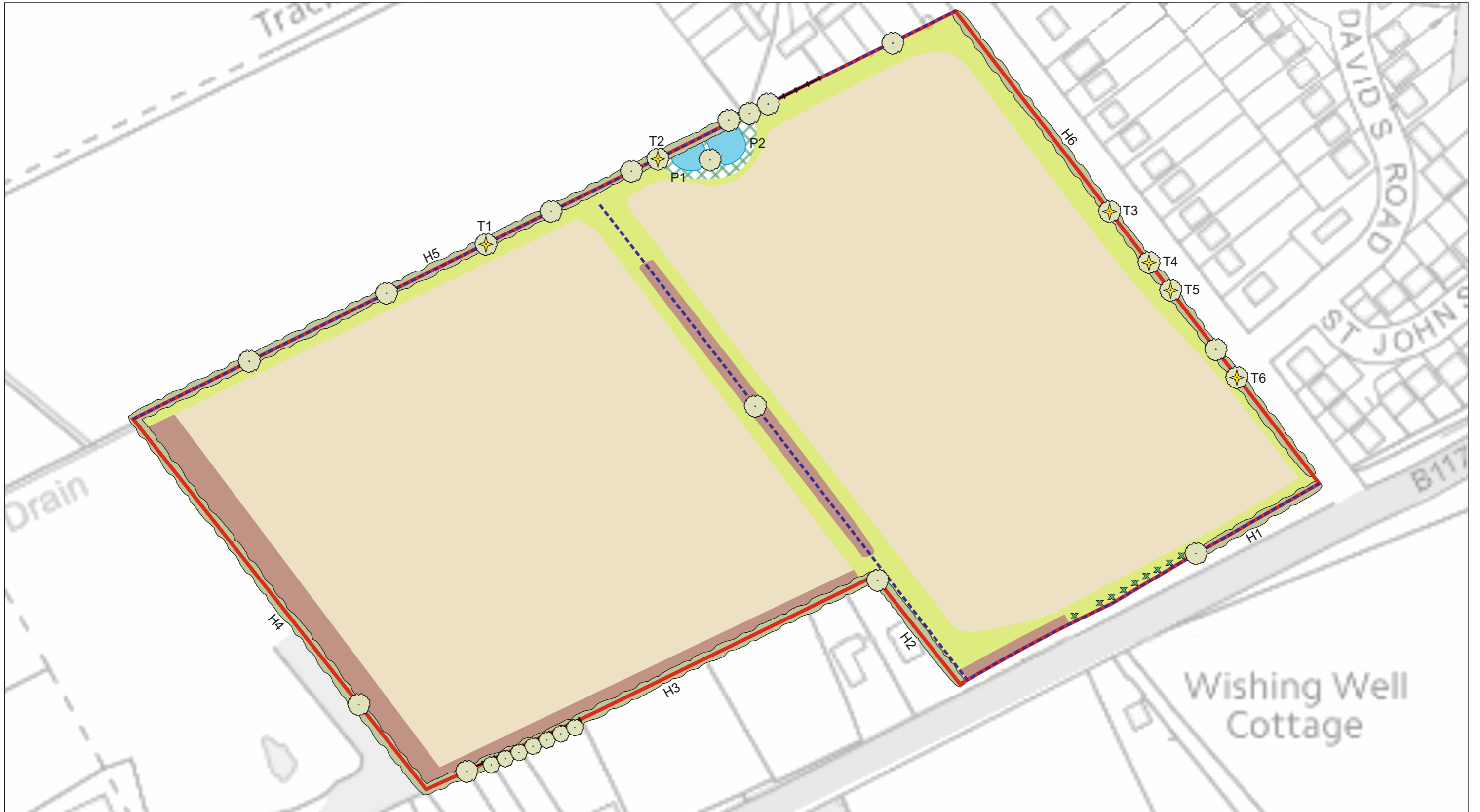
Reptiles

- 3.3.17. Some potential opportunities for reptile species are present within the site, associated with the grassland and tall ruderal vegetation along the field margins.
- 3.3.18. **Constraints:** Widespread reptile species receive partial protection (in the form of the animals themselves) under the Wildlife and Countryside Act 1981 (as amended). Opportunities for reptile species are present at the site, and accordingly, it is recommended that a survey to determine presence/absence of reptiles is undertaken to inform a planning application. Such surveys can be undertaken between April and September inclusive.
- 3.3.19. **Opportunities:** The creation of long-sward wildflower grassland habitats within the site would provide enhanced opportunities for reptiles. In addition, provision of log piles would provide areas for basking and shelter, whilst hibernacula would provide over-wintering sites.













4. SUMMARY AND CONCLUSION

- 4.1. From the desktop and field survey work undertaken, it does not appear that there are any major constraints, in ecological terms, to the development of the site.
- 4.2. The closest identified statutory ecological designation is Toll's Meadow, Wymondham LNR, situated approximately 4.3km to the south-west of the site. The European-level designations Norfolk Valley Fens SAC and River Wensum SAC are also present in the wider area, however no significant effects are anticipated on these designations as a result of the proposed development. As such, statutory designations are considered unlikely to pose a constraint to the development of the site.
- 4.3. A number of non-statutory nature conservation designations are located within the surrounds of the site. However, given the small scale of the proposals and subject to appropriate mitigation and safeguards as part of the proposed development, it is considered unlikely that development would result in adverse effects on these designations.

- 
- 4.4. The site is dominated by arable fields supporting low ecological value, whilst habitats providing some interest within the context of the site including the central drain, hedgerows, trees, ponds and grass margins are generally restricted to field boundaries and can be largely retained under a sensitive development layout. An opportunity exists to enhance habitats within the site for the benefit of biodiversity through appropriate management and new habitat creation.
 - 4.5. In respect of fauna, survey work has been undertaken in respect of Great Crested Newts, whilst it is recommended some further work is carried out in regard to reptiles to assess whether this species group is present and inform any mitigation and licensing measures which may be required. Consideration should also be given to potential for bats and birds under the proposals, although given suitable habitats are largely restricted to field boundaries, it is likely they can be maintained under a sensitive development layout.
 - 4.6. In conclusion, it is considered that the site does not support any significant ecological constraints such that it could accommodate development following a sensitively designed masterplan. Notably, it is recommended that the habitats of some value within the context of the site, namely the central drain, hedgerows, trees, ponds and grass margins be retained, and consideration be given to the presence of protected species including bats, reptiles and nesting birds. A number of opportunities to enhance the ecology of the site are available which have the potential to lead to net gains for biodiversity as part of any sensitively designed scheme. On this basis, it can be concluded that the site appears highly deliverable in ecological terms.



KEY:

- | | | | |
|---|-----------------------------------|---|------------------------------------|
|  | SITE BOUNDARY |  | HEDGEROW |
|  | ARABLE |  | TREE |
|  | SEMI-IMPROVED GRASSLAND |  | TREE WITH CATEGORY 2 BAT POTENTIAL |
|  | ROUGH GRASSLAND AND TALL RUDERALS |  | POND |
|  | SCATTERED SCRUB |  | DRY DITCH |
|  | DENSE SCRUB |  | FENCE |

aspect ecology

Aspect Ecology Limited - West Court - Hardwick Business Park
 Noral Way - Banbury - Oxfordshire - OX16 2AF
 01295 276066 - info@aspect-ecology.com - www.aspect-ecology.com

HETHERSETT, NORFOLK PROJECT

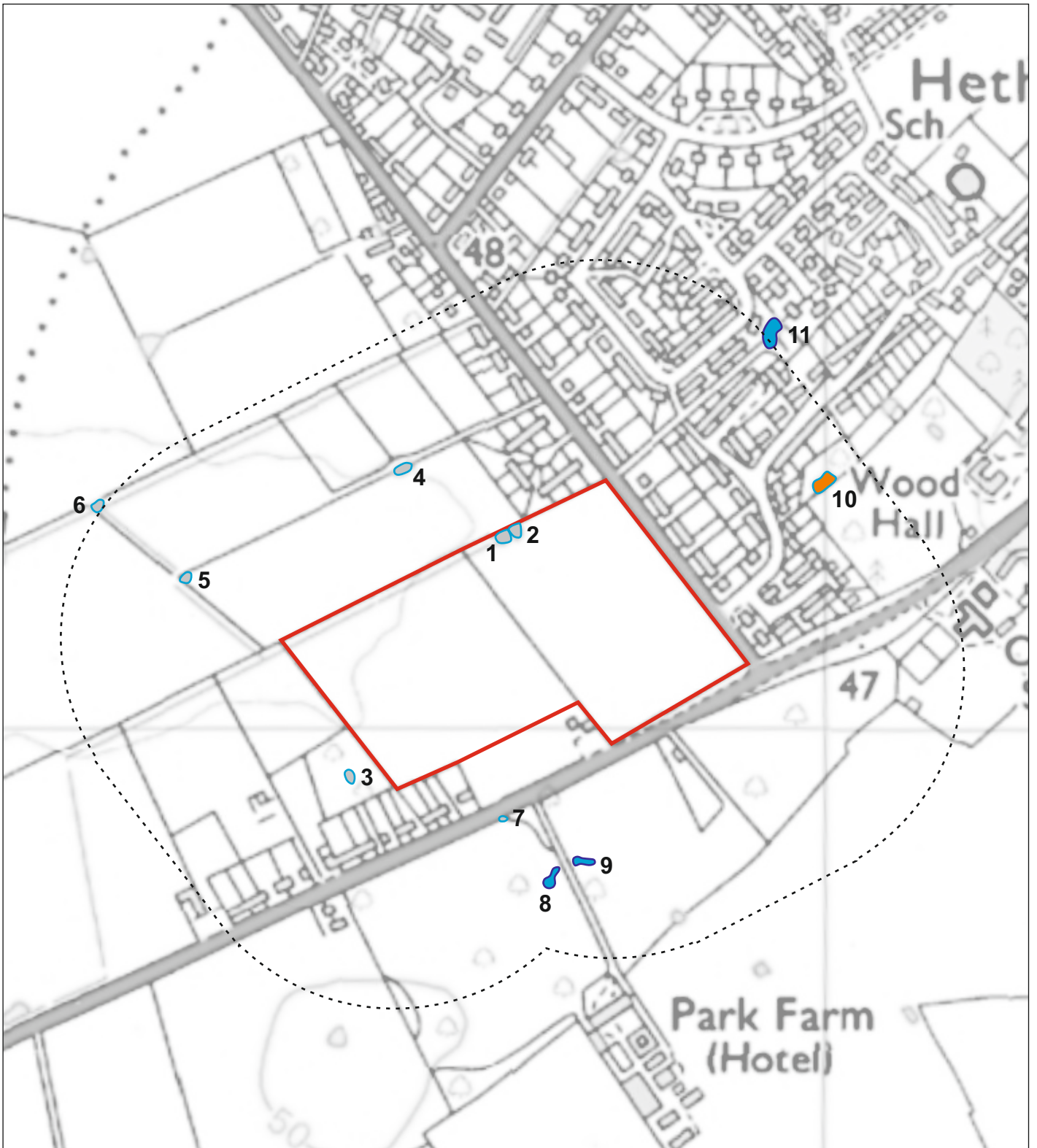
HABITATS AND ECOLOGICAL FEATURES TITLE








4393/BN1 DRAWING NO.

- REV. DATE

SEPTEMBER 2015



KEY:

-  SITE BOUNDARY
-  250m RADIUS FROM SITE BOUNDARY
-  POND SURVEYED (EDNA) - GCN ABSENT
-  POND RECORDED TO BE DRY
-  POND NOT SURVEYED (NO ACCESS)

aspect ecology

Aspect Ecology Limited - West Court - Hardwick Business Park
 Noral Way - Banbury - Oxfordshire - OX16 2AF
 01295 276066 - info@aspect-ecology.com - www.aspect-ecology.com

**HETHERSETT,
 NORFOLK**

**GREAT CRESTED NEWT
 SURVEY RESULTS**

4493/BN2

SEPTEMBER 2015

PROJECT
 TITLE
 DRAWING NO.
 REV.
 DATE



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

**Supporting Representation:
Green Infrastructure Strategy**

July 2016

Issue Sheet

Supporting Representation:
Green Infrastructure Strategy

July 2016

Prepared by:

Signature:

Name: Ian Reilly

Title: Senior Planner

Date: 08 July 2016

Approved by:

Signature:

Name: Philip Atkinson

Title: Director

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.

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




**Supporting Representation:
Green Infrastructure Strategy**

**Appendix 1 –
Sites Location**



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
Total	143.01 Ha

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

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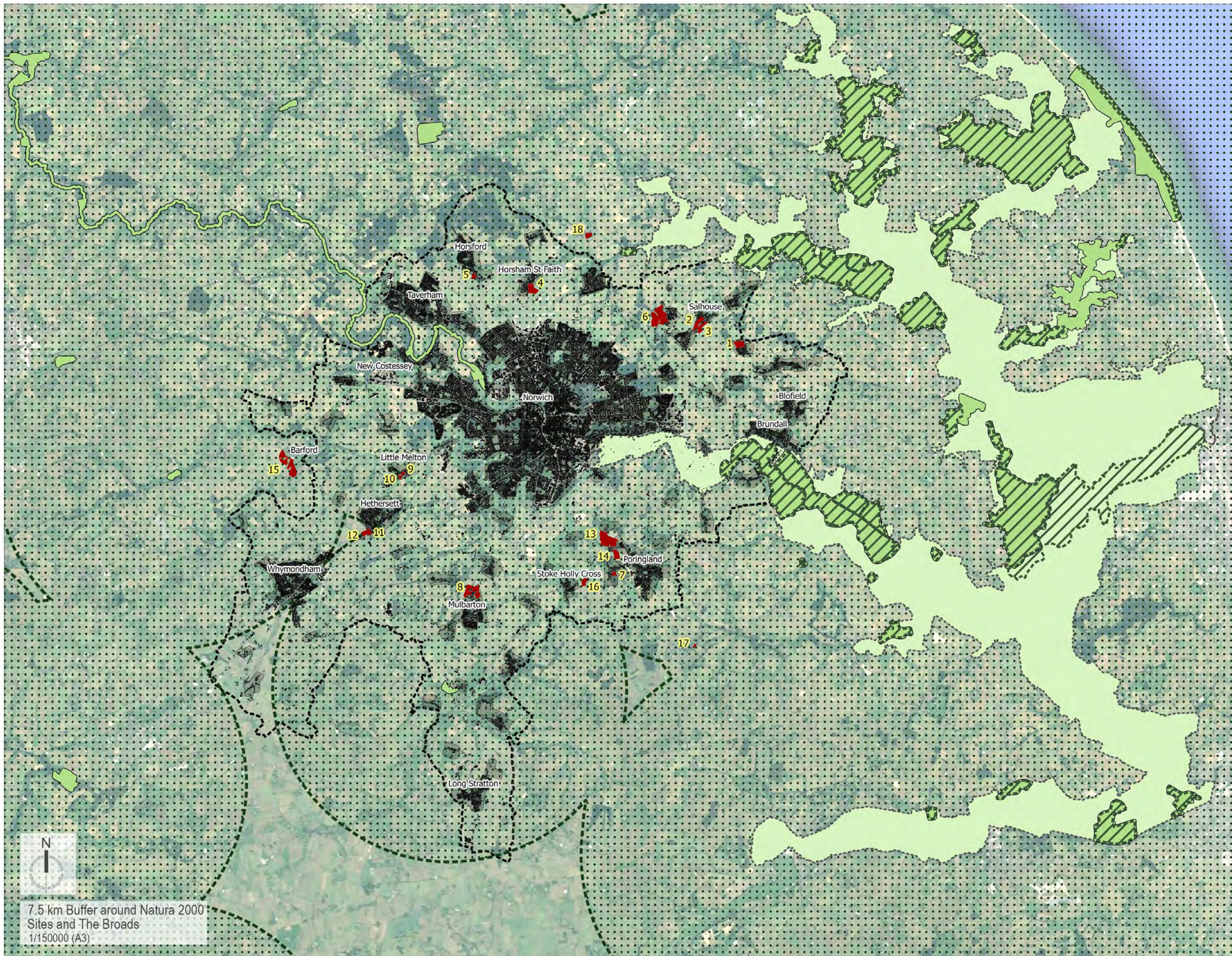


001 Site Location
1/150000 (A3)

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

**Supporting Representation:
Green Infrastructure Strategy**

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



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
JUNE 2016

DRAWN BY
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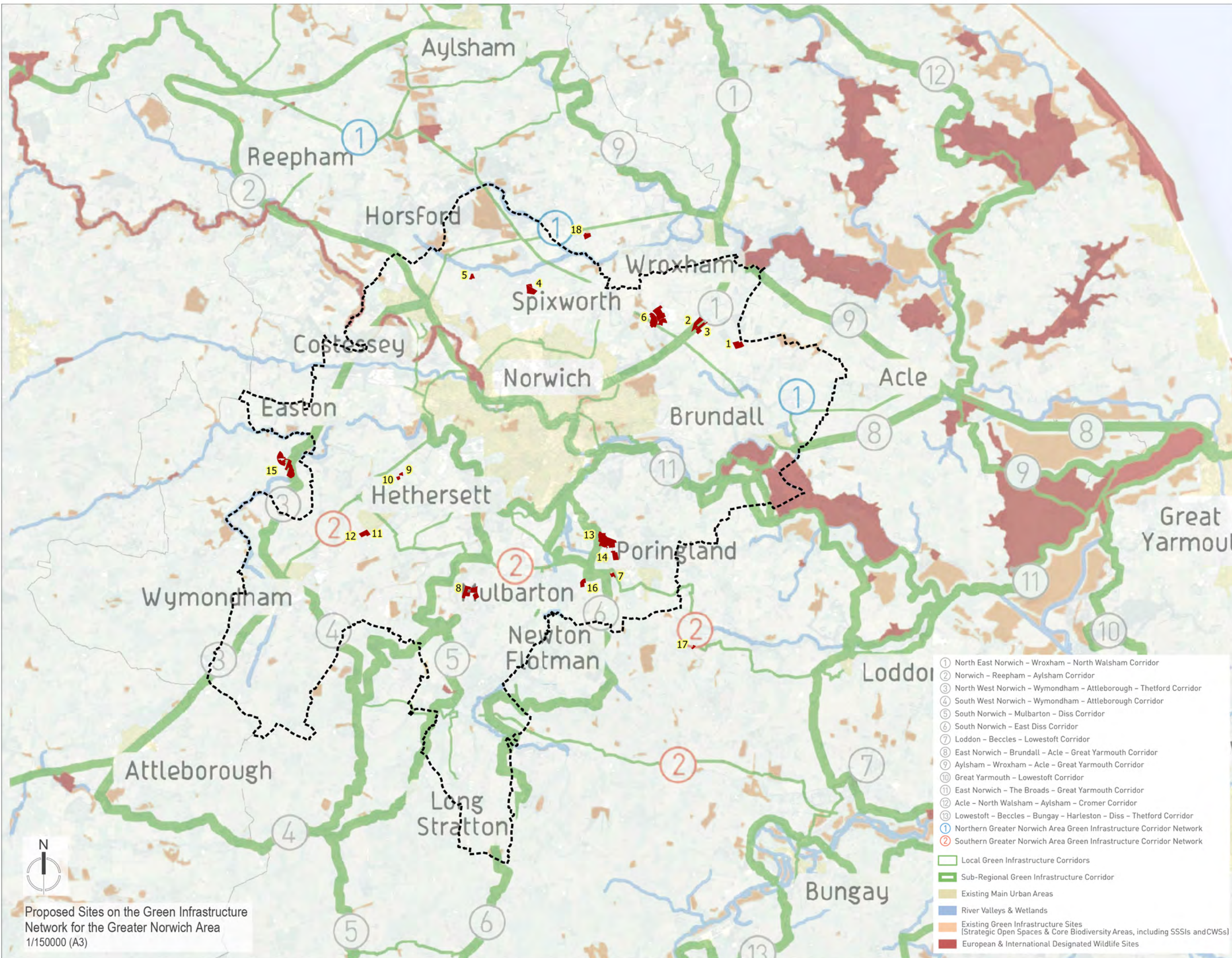


7.5 km Buffer around Natura 2000
Sites and The Broads
1/150000 (A3)

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

**Supporting Representation:
Green Infrastructure Strategy**

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



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
003

SCALE
1/150000 (A3)

DATE
JUNE 2016

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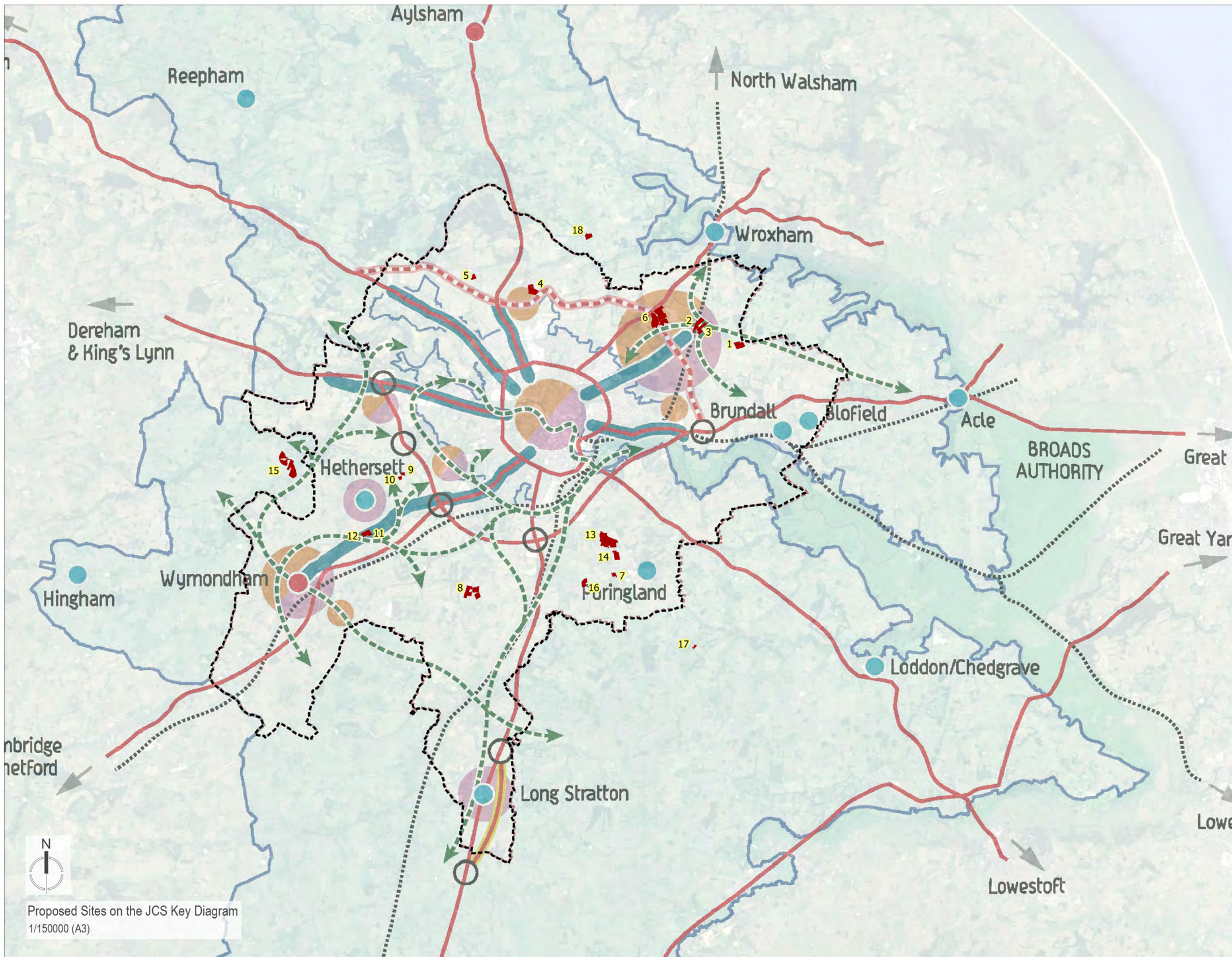
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- ① North East Norwich – Wroxham – North Walsham Corridor
 - ② Norwich – Reepham – Aylsham Corridor
 - ③ North West Norwich – Wymondham – Attleborough – Thetford Corridor
 - ④ South West Norwich – Wymondham – Attleborough Corridor
 - ⑤ South Norwich – 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

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

**Supporting Representation:
Green Infrastructure Strategy**

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



- 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 004

REV

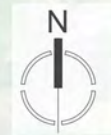
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Proposed Sites on the JCS Key Diagram
1/150000 (A3)