#### **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: <u>callforsites@gnlp.org.uk</u> 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 code	post			
(please include as an attac				
to this response form a local plan of the site on an scale				
base with the boundaries of				
site clearly shown)				
Grid reference (if known)				
Site area (hectares)				

L

Site Ownership						
3a. I (or my client)						
Is the sole owner of the site	Is a part owner of the site		s not own al interest itsoever			
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			
of the sites owners support	ne above question please pr your proposals for the site.	ovide dei	alis of wn	y not all		
Current and Historic Land Uses  4a. Current Land Use (Please describe the site's current land use e.g. agriculture,						
4b. Has the site been previously developed?						
•						

<b>J</b> .	**	ovide details of any relevant
historic planning applicat	ions, including application r	numbers if known)
Proposed Future Uses		
•	t description of the develop	
<b>proposed</b> (if you are proposed please go directly to que	osing a site to be designate	d as local green space
please go directly to que.		
5b. Which of the following	use or uses are you propos	ing?
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)
	details of your proposal, inc	cluding details on number of
houses and proposed floo	orspace of commercial build	dings etc.
	penefits to the Local Area tha	at 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.
6b. Please describe why you consider the site to be of particular local significance e.g. recreational value, tranquillity or richness in wildlife.
Site Features and Constraints
Are there any features of the site or limitations that may constrain development on this site (please give details)?
<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?
<b>7b. Topography:</b> Are there any slopes or significant changes of in levels that could affect the development of the site?
7c. Ground Conditions: Are ground conditions on the site stable? Are there potential ground contamination issues?
<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?
<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?

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?					
7g. Heritage Issues: Are there ar	ny listed buildings,	Conservation Are	eas, Historic		
Parklands or Schedules Monume	ents on the site or	nearby? If so, how	w might the		
site's development affect them'	?				
7h Naighbarring Hass Mest or			bortho		
<b>7h. Neighbouring Uses:</b> What are proposed use or neighbouring u	•	•	ner the		
proposed use of freighboding u	ises nave any imp	MCations:			
7i. Existing uses and Buildings: a	re there any existi	ng buildings or us	es that need to		
be relocated before the site cal	n be developed.				
7j. Other: (please specify):					
Utilities					
8a. Which of the following are like	cely to be readily	available to servi	ce the site and		
enable its development? Please	-				
·	•	•			
			1 1		
	Yes	No	Unsure		
	Yes	No	Unsure		
Mains water supply	Yes	No	Unsure		
5	Yes	No	Unsure		
Mains water supply  Mains sewerage	Yes	No	Unsure		
Mains sewerage	Yes	No	Unsure		
5	Yes	No	Unsure		
Mains sewerage	Yes	No	Unsure		

Public highway

Broadband internet

Other (please specify):		
8b. Please provide any further	informa	ation on the utilities available on the site:
Availability  9a. Please indicate when the sidevelopment proposed.	site cou	uld be made available for the land use or
Immediately		
1 to 5 years (by April 2021)		
5 - 10 years (between April 202	21 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		
-		ate category below to indicate what level of he site. Please include relevant dates in the
	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 begun.	antici	pate the propose	d develop	oment cou	uld be
Up to 5 years (by April 2021)					
5 - 10 years (between April 2027	1 and	2026)			
10 - 15 years (between April 20	26 and	d 2031)			
15 - 20 years (between April 20	31 and	d 2036)			
11b. Once started, how many y		lo you think it wo	uld take t	o comple	te the
proposed development (if know	vii) :				
Viability					
12a. You acknowledge that the		•	•		
and Community Infrastructure L					
addition to the other developm type and scale of land use proj					
include but are not limited to: A		•		•	
Children's Play Space and Con		• .		ď	
		<b>J</b>	Yes	No	Unsure
12b. Do you know if there are the	nere a	ny abnormal			
costs that could affect the viab	_	_			
infrastructure, demolition or gro				L	
12c. If there are abnormal costs	s asso	ciated with the sit	e piease	proviae a	etaiis:
12d. Do you consider that the s	ite is c	urrently viable			
for its proposed use taking into		_			
current planning policy and Cll					
other abnormal development of the site?	costs a	ssociated with			
me site?			I	1	1

	ch any viability assessment or development appraisal you have the site, or any other evidence you consider helps demonstrate the ite.
Other Relevant I	nformation
	ne space below to for additional information or further explanations pics 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

I understand that:

#### **Data Protection and Freedom of Information**

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:

- 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.

#### Disclaimer

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.

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.

Name	Date







# **Briefing Note**

Site: Caistor St. Edmund (5013)

# **Preliminary Ecological Overview**

July 2016

#### 1 Introduction

1.1 Aspect Ecology has been appointed to provide ecological input in respect of potential development of a site at Caistor St. Edmund. 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

<b>Ecological Designations</b>			
Likely Constraint	Moderate		
Notes	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. A portion of the site falls within relevant Impact Risk Zones for a number of Sites of Special Scientific Interest (SSSIs).		
	The most likely constraints would relate to 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.		

<b>Site Description</b>	
Likely Constraint	Moderate
Notes	The site is situated adjacent to a small residential settlement near Caistor St. Edmund, largely surrounded by mixed farmland with associated hedgerows, and areas of woodland.  The site comprises a series of arable and grassland fields, woodland, ponds, and buildings to the north and south of Caistor Lane. A number of ponds are also present within 250 m of the site boundary.



Three blocks of woodland present within the site are listed as the Priority Habitat: Deciduous Woodland with one also listed as Ancient Semi-natural Woodland. Additionally, a small number of veteran trees are listed on the Woodlands Trust Database within the site.

Habitats of elevated ecological value within the site that would constrain potential development are woodland (particularly the ancient woodland), hedgerows, trees, and substantial areas of species-rich grassland should they be present.

#### 3 Ecological Deliverability

Statutory Designations – some constraints currently anticipated, but these could be mitigated

3.1 The Joint Core Strategy for Greater Norwich (adopted March 2011 with amendments adopted into the South Norfolk Local Plan January 2014) 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 The South Norfolk Local Plan also includes a number of Neighbourhood Development Plans; no current plan exists for Caistor St. Edmund. The Joint Core Strategy erroneously recorded Caistor St. Edmunds as an 'Other Village', within which only limited infill development can occur; as such, the South Norfolk Local Plan currently identifies the area as a Small Rural Community with no defined development boundary. Consequently, it is unclear if the Habitats Regulations Assessment (HRA) undertaken of the Site Specific Allocations and Policies Document¹ considers larger-scale development within this area.
- 3.3 Nevertheless, the aforementioned HRA concluded that Appropriate Assessment for any of the international designations was unlikely to be required. As such, it is likely that closer inspection of Local Policies and, if necessary, correspondence with Natural England through the Discretionary Advice Service will be sufficient to inform suitable mitigation for potential effects on nearby statutory designations. Consequently, it is considered that potential effects on nearby statutory designations resulting from an increase in recreational pressure can be mitigated by the provision of well-designed open space.
- 3.4 As such, based on this initial assessment, no significant constraints are currently anticipated which may affect deliverability of development of this site, in terms of statutory designations. Following a more detailed view of Local Policy and the proposals for the site, a document to inform a Habitats Regulations Assessment may need to be produced.
- 3.5 It should be noted that information on non-statutory designations is pending from NBIS.

5013 Briefing Note BN1 vf1 2

Norfolk County Council Natural Environmental Team (2013). Habitats Regulation Assessment of the Site Specific Allocations & Policies Document, Wymondham Area Action Plan, Long Stratton Area Action Plan and Cringleford Neighbourhood Development Plan, undertaken for South Norfolk Council.



# <u>Habitats and Fauna – some potential constraints currently anticipated which could be mitigated</u>

- 3.6 Based on this initial assessment, constraints have been identified at this stage in relation to habitats, albeit these constraints could be mitigated. The ancient woodland within the site is currently considered to comprise the largest constraint in terms of habitats, followed by the other deciduous woodlands. Ancient woodland is an irreplaceable habitat and as such should be fully retained, and protected from degradation during construction and operational phases of any development, for example through mitigation, buffering (minimum 15 m), access control, and habitat management.
- 3.7 The other blocks of Priority Habitat Woodland should also be retained as far as possible and protected during construction and operational phases. As such, the proposals are largely constrained to retain these habitats together with appropriate buffers. The ancient woodland in particular will require a sizeable greenspace buffer and consideration of minimising recreational impact. However, creation of these buffer habitats where arable land currently extends to the boundary of the woodlands may be presented as a significant ecological enhancement in a planning application.
- 3.8 The majority of the rest 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 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), 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.
- 3.9 Based on this initial assessment, in terms of fauna, the site and adjacent/nearby habitats potentially offers opportunities for nesting birds, roosting bats (trees and buildings), foraging / commuting bats, and reptiles and amphibians. Recommendations for further survey work on the aforementioned species will require clarification on completion of a Phase 1 Habitat Survey and data returned from NBIS. However, it is considered that, in the event protected species are present, mitigation would be 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 woodlands, hedgerows, trees, and ponds, 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.



**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
Approved by:
Signature:
Name: Philip Atkinson
Name: Philip Atkinson
·
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.
- 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.
- 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 considered the direct and indirect effects of population growth upon the integrity of these sites.
- 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.
- 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.

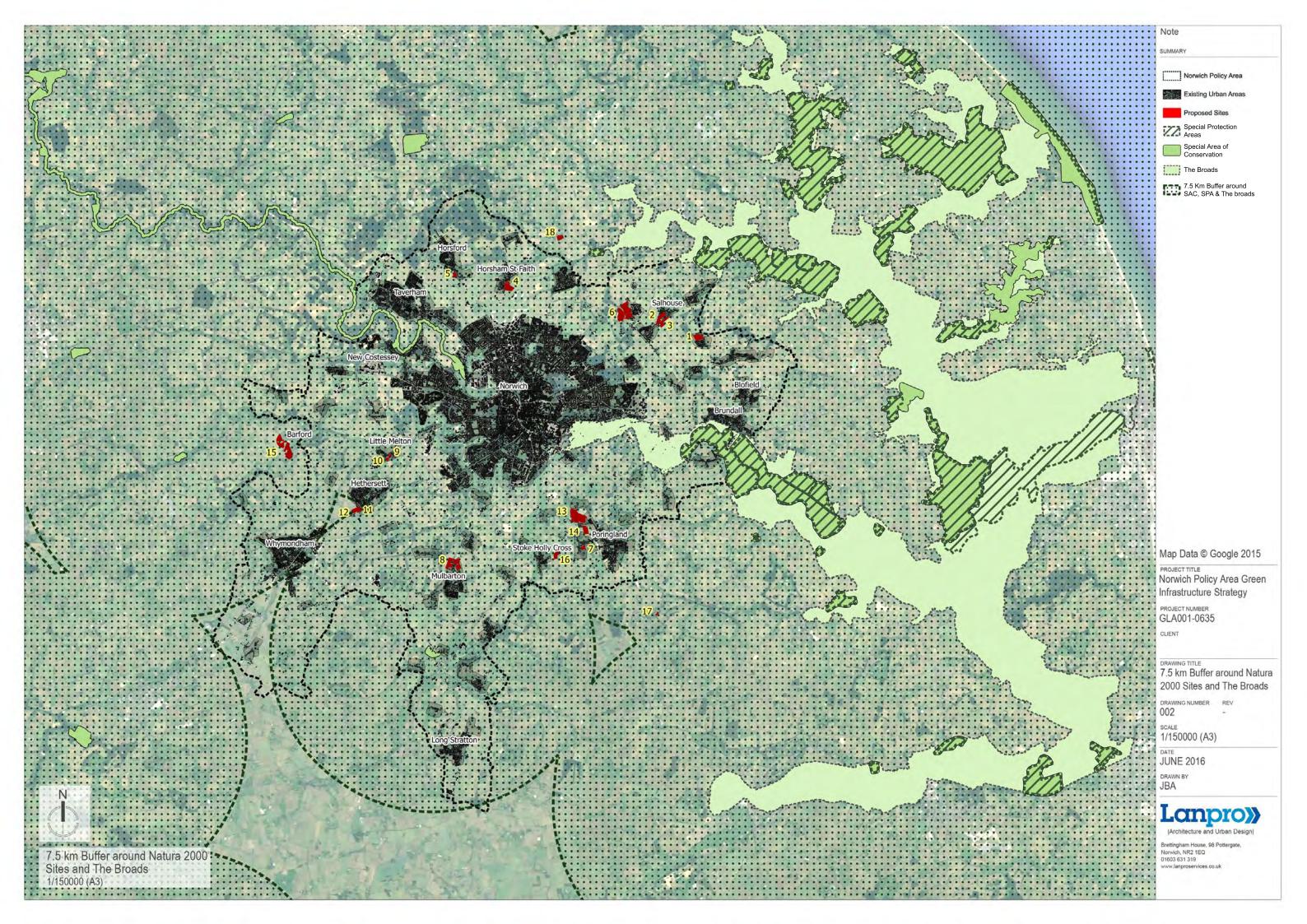
Supporting Representation: Green Infrastructure Strategy

Appendix 1 – Sites Location



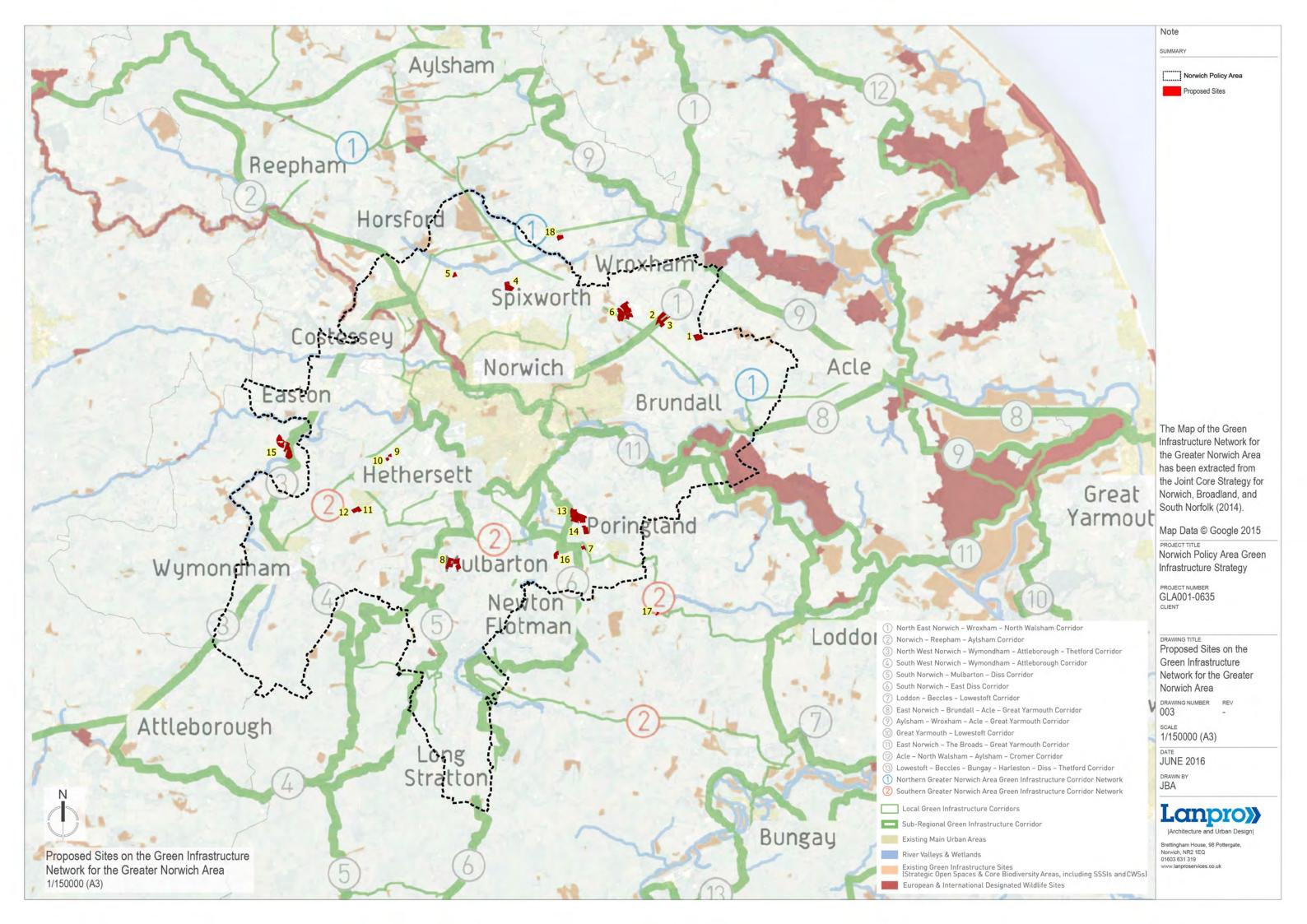
**Supporting Representation: Green Infrastructure Strategy** 

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



**Supporting Representation: Green Infrastructure Strategy** 

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



**Supporting Representation: Green Infrastructure Strategy** 

Appendix 4 Proposed Sites on the
JCS Key Diagram

