



**GNLP Regulation 18 Consultation Response  
March 2018**

**Land south of Norwich Road, Salhouse  
GNLP0491 **

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## 1. Executive Summary

This large site on land to the south of Norwich Road, Salhouse is being promoted as a strategic housing site delivering circa. 85 dwellings. The site has been previously promoted through the emerging Greater Norwich Local Plan and assigned the reference GNLP0491. The promoted scheme is further designed to enable delivery of 6ha of additional green infrastructure to extend the new Salhouse Country Park to the north of Norwich Road to meet existing green infrastructure deficiencies in this part of the Norwich Policy Area.

The site is located on the northern edge of the Growth Triangle that is main focus for new housing growth within the Broadland District part of the Norwich Policy Area. This part of the Norwich Policy Area is particularly sensitive due to the proximity of The Broads. Specific parts of The Broads within this part of the Norwich Policy Area are designated Site of Special Scientific Interest, Special Protection Area, Environmentally Sensitive Area, National Nature Reserve and Ramsar. The new Country Park proposed is sufficiently large and can be made attractive for recreation and leisure to be a realistic alternative to visiting The Broads.

As such the mixed-use scheme proposed is highly sustainable as it will deliver net environmental gains for nature and improve public health and community wellbeing within the Growth Triangle area.

## 2. Site Introduction and Description

The site promoted has already been submitted into the previous call-for-sites process and has been assigned the reference GNLP0487. The site is some 10 ha in area and is located within the village of Salhouse. The site is bounded to the north and east by existing residential development and adjoins the northern edge of the Growth Triangle to the west. A Location Plan showing the location of the site is contained within Appendix B of this document.

The Growth Triangle is the main focus for new housing growth within the Broadland part of the Norwich Policy Area. The village is identified in the approved Joint Core Strategy as a Service Village.

The land is under option that is essentially a large infill site is immediately available/deliverable to meet planned housing targets and to address existing acknowledged shortfalls in accessible public open space.

This site is being promoted for circa. 85 new dwellings, including affordable housing, and a large area of permanent green infrastructure in the form of an extension to the new Salhouse Country Park. This 5ha area of new strategic green infrastructure can be delivered early in the Local Plan period to offset growth pressures from major developments within the Growth Triangle.

This new park will be laid out as open space and new woodlands and will be equipped for informal play, recreation and leisure. Vehicular access and car parking will be directly off Norwich Road. The site is also highly accessible by rail via Salhouse Station that is within a short walk distance of the site. The quantum of housing and green infrastructure proposed in this instance is considered appropriate to the size of Salhouse and the wider Growth Triangle.

The scheme has been designed to meet existing acknowledged shortfalls in green infrastructure provision in Broadland District Council area. This new green space will take visitor pressure off Salhouse Broad on the eastern side of the village.

Although the extension to the new Salhouse Country Park would constitute an abnormal cost in scheme delivery terms, the full cost of laying-out the space as informal grassland, construction of the access road and car parking area, and supplying and maintaining the play equipment proposed has been factored into the business plan.

The scheme has been devised having regard to planning guidance contained in the National Planning Policy Framework (NPPF). This development will provide social gain through increased recreation and sporting opportunities which leads to community development and social inclusion; economic gains through making Salhouse more attractive to housing and new business. The scheme will also deliver net environmental gains for nature and improve existing and future residents' quality of life.

The NPPG is very clear that green infrastructure is vitally important to the delivery of high quality sustainable development. In this instance the green infrastructure is well planned and will improve public health and community wellbeing within the villages of Salhouse and New Rackheath. In addition, the proposals will deliver wider environmental improvements; new opportunities for recreation and exercise to delivering mental and physical health benefits.

An indicative layout plan showing how the housing and green spaces areas could be laid-out and accommodated with the site is contained in Appendix C of this document. The access designs for the site showing the relevant geometry are also contained within Appendix D of this document.

## 3. Site Location

## 4. Site Opportunities

The opportunity exists to meet housing needs within the Norwich Policy Area. This area remains the focus for sustainable development within Norwich, Broadland and South Norfolk Council areas.

The site is well related to existing services and facilities in the City of Norwich and public transport access to the site is excellent.

The opportunity exists to deliver a significant amount of housing to meet unmet housing need and the extension to the new Salhouse County Park proposed to be delivered on the north site of Norwich Road. This large amount of immediately deliverable extra permanent green infrastructure will go a long way to meeting existing shortfalls in an accessible location within the Norwich Policy Area.

The mixed-use scheme proposed will also go a long way to reducing visitor pressures and harm to The Broads.

## 5. Consultation Questions

\*\*answer/delete when appropriate

### **Section 3 – The Vision and Objectives for Greater Norwich**

#### **1. Do you agree with the draft version and objectives for the plan below?**

Yes, we broadly agree with the vision and objectives for Greater Norwich to 2036 as set out at Figure 1, subject to our more detailed representations on specific issues below.

### **Section 4 – The Strategy**

#### **Delivering jobs, homes and infrastructure**

#### **2. Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1-4.7?**

The Greater Norwich Local Plan is an opportunity to make the wider Norwich area a hub for investment, commercial activity and high- quality place making, which will be of benefit to all who live and work there, building on the significant existing attributes.

We welcome the joint working of the different authorities, who will lead the planning process for this Plan, in our view to take the required strategic view essential to the future prosperity of the Greater Norwich area.

There is a recognition in the Regulation 18 consultation of the positive attributes of the Greater Norwich area, which are supported. However, to ensure a bright and prosperous future an ambitious strategy is essential, which also respects existing key characteristics.

We have serious concerns regarding the calculation of the overall housing requirement for the plan period as set out in our answer to question 4 below. The favoured option must be to deliver forecast jobs growth plus additional growth. We are of the view that a realistic assessment of the requirement would lead to a figure of between 11,000-14,000 homes in order to deliver City Deal jobs growth aspirations.

#### **Job Targets**

#### **3. Which option do you support for jobs growth? (refers to options on pg.28)**

There is a recognition in the Regulation 18 consultation of the positive attributes of the Greater Norwich area, which are supported, however to ensure a bright and prosperous future an ambitious strategy is essential, which also respects existing key characteristics.

The Greater Norwich Local Plan is an opportunity to make the wider Norwich area a hub for investment, commercial activity and high-quality place making, which will be of benefit to all who live and work there, building on the significant existing attributes.

The favoured option must, therefore, be to deliver forecast jobs growth plus additional growth (Option JT1).



## Calculating the Housing Numbers for the Plan

### 4. Do you agree that the OAN for 2017-2036 is around 39,000 homes?

The overall housing requirement number of 7200 dwellings derived from an OAN of around 39,000 is not supported and is considered to be too low.

The GNDP's 2016 call for sites consultation considered that sites for around 12,000 new homes were needed. It is surprising that this has reduced so significantly to 7200 for this round of consultation. We are very doubtful that this figure is sufficient to meet the housing requirement for Greater Norwich for the period to 2036.

At this point in time we do not support the use of the Government's proposed methodology for the calculation of OAN as set out in the consultation paper 'Planning for the Right Homes in the Right Places'. This is still at the consultation stage and has been subject to a significant number of representations objecting to various aspects of the proposed calculation e.g. from the Planning Officers Society, Homebuilders Federation and the RTPI. One of the many failings of the proposed methodology is the absence of consideration of economic objectives. There is no certainty that this methodology will come into effect, either in its current form, or at all and we cannot, therefore, understand why it is being used at this point in time.

We do not support the figure of 7200 homes arising from the use of the draft Government methodology for the calculation of housing numbers. Para 4.17 of the Growth Options Document states that the OAN figure for Greater Norwich is 38,988 dwellings for 2017 - 2036 based upon this methodology. This figure should be used with caution because it uses figures taken from the 'Application of proposed formula for assessing housing need, with contextual data' table that accompanies the Government Consultation document. This is an indicative assessment of dwellings per annum need based upon a draft formula for the period 2016-2026, rather than for the period 2017 -2036. Furthermore, it does not consider economic objectives for the area.

Government draft OAN figure 2017-2036:	38,988
Minus commitments of:	35,665
Sub Total:	3,323
Plus 10% buffer on 38,988	3899
TOTAL HOUSING REQUIREMENT (2017-2036 as contained within Growth Options Document)	7222

The calculation of the OAN should in any event be only a starting point for calculating housing numbers for the plan. The Government OAN figure does not include the housing necessary to deliver economic objectives via the City Deal which has been agreed with Central Government in order to help turn knowledge into growth and 13,000 additional jobs'. Delivery of these objectives is necessary to ensure that the area is eligible to receive the related Government funding for infrastructure and business support, enterprise and innovation that is due from this. We consider that it is important that the City Deal requirements are included as they have already been committed to and will contribute to the Greater Norwich and wider economy.

Plan makers are entitled to utilise different methods of assessing need to the Government's draft methodology and if these produce figures that are higher, the Government proposes that Inspectors should consider such approaches sound unless there are compelling reasons to indicate otherwise. Therefore, where it is sensible to propose higher figures based on employment growth or higher affordable housing needs there is scope to do this and the "significant contribution" that Government sees the City Deal making "to the recovery and future growth of the UK economy" (source: Greater Norwich City Deal) is valid justification for this.

Furthermore, paragraph 158 of the NPPF requires that Local Plans ensure that strategies for housing and employment set out in their plans are integrated and take full account of relevant market and economic signals. Not to include the City Deal requirements would be a failure to meet this requirement.

If the City Deal housing requirements are added to the Government OAN figures the housing requirement for the period 2017-2036 should be as follows:

Government draft OAN figure 2017-2036:	38,988
Minus commitments of:	35,665
Sub Total:	3,323
Plus, City Deal Housing Requirement from 2017 SHMA (SHMA fig:101)	8,361
Subtotal:	11,684
Plus 20% buffer on sub-total (see qu. 6 reasoning below):	2337
<b>TOTAL HOUSING REQUIREMENT (2017-2036):</b>	<b>14,021</b>

We consider that the up to date Strategic Housing Market Assessment June 2017 figures for the calculation of the housing requirement should be used until the Government’s methodology is formally put into practice. The SHMA sets out a Policy -on full objectively assessed need for housing for the period 2015-36 for the Greater Norwich Area of 44,714 **including** the City Deal housing requirement (Figure 96: Central Norfolk Strategic Housing Market Assessment 2017). This would indicate a residual requirement of 10,859 homes 2015-2036 taking into account a 20% buffer:

Policy-on SHMA OAN figure including City Deal:	44,714
Minus commitments of:	35,665
Subtotal:	9,049
Plus 20% buffer on sub-total (see qu. 6 reasoning):	1810
<b>TOTAL HOUSING REQUIREMENT (2015-2036):</b>	<b>10,859</b>

Paragraph 5.7 of the SHMA states:

” We would note that in the Central Norfolk SHMA 2015, the potential impact of the City Deal was considered part of the OAN, but greater clarity now indicates that it is an aspirational jobs target which **should be treated as part of the housing requirement** (our emphasis), not the OAN.”

It is important that the City Deal requirements are not ignored and are included in the final housing requirement figure as they have already been committed to and will contribute to the Greater Norwich and wider economy. This should be the case whether the Government or SHMA OAN methodology is used.

Both scenarios suggest that the housing requirement to 2036 should be significantly **higher** than the 7200 homes specified in the Growth Options Document and a figure in the range of 11,000 to 14,000 would be more appropriate.

We note that the Growth Options Document is unclear about the proposed base date of the plan and we consider that clarity on this is required once the OAN methodology is confirmed.

Rebasing the start date of the Local Plan to 2017, should not be used as an excuse to reduce previous backlog. Both above methodologies are set to different plan start dates, but both are intended to take into account previous backlog in assessing the housing requirement going forward.

We also consider that the deliverability of some of the existing 35,665 commitments may be questionable and further consideration should be given to this to ensure that it is a robust figure to use in the calculation of the housing requirement.

**5. Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?**

The figure of 7200 homes is considered to be too low for the reasons set out above and also because a 10% delivery buffer is too low. This is particularly the case bearing in mind the track record of persistent under delivery of housing within the Norwich Policy Area since the adoption of the current Joint Core Strategy. This has necessitated the addition of a 20% buffer to the calculation of five-year supply of housing land in the Norwich Policy Area. Whichever of the 6 growth options, or variations on them is finally chosen, it is likely that the vast majority of housing will be allocated in locations in and around Norwich because this is a sustainable model for future growth. All of the growth options show over 70% of housing to be located within the Norwich Policy Area. We consider that in order to ensure competition and choice in the availability of housing land and reduce the future likelihood of lack of 5-year supply, a 20% buffer should be added to the OAN figures for the purposes of calculating the housing requirement. Windfalls should not be relied upon to make up any shortfalls. (see question 6 for more information).

**6. Do you agree that windfall development should be in addition to the 7,200 homes?**

Paragraph 4.24 of the plan states that “based upon current trends and projected future delivery, it is estimated that an additional supply of up to 5,600 dwellings could be provided during the plan period on “windfall” sites. This is likely to be an over estimate. Recent trends have been very much influenced by the lack of 5-year housing land supply within the Norwich Policy Area. If during the new plan period there is no longer a shortage of 5-year land supply, then the amount of delivery on windfall sites will be significantly reduced. Windfall development in recent years has also been dependent upon the availability of unallocated brownfield sites within the city and other towns becoming available. Due to the emphasis on brownfield development in recent years it is considered that the availability of this source of windfall is also likely to be reduced during the future plan period. There should not be any reliance placed upon significant amounts of windfall coming forward within the plan period to deliver the required housing numbers. Windfall should be in addition to the final housing requirement number chosen.

**Delivering Infrastructure**

**7. Are there any infrastructure requirements needed to support the overall scale of growth?**

Inevitably with any significant housing and employment growth there will be supporting infrastructure requirements. It is essential that these are properly planned for at the outset. There is a need for investment particularly on key infrastructure. The opening of the NDR will help to facilitate growth to the east and north of the city. It is also likely that improvements will be required to A47 southern bypass junctions, e.g. Thickthorn, Longwater to ensure sufficient capacity. Opportunities for better public transport linkages including rail and bus also need to be properly considered.

Developing at scale to provide new settlements allows the delivery of essential facilities such as new green infrastructure that not only benefit the occupiers of the new dwellings, but also existing and nearby communities. This is far more secure than the pooling of planning contributions which often fails to deliver.

## ***How should Greater Norwich grow?***

### Existing Housing Commitment

#### **8. Is there any evidence that the existing housing commitment will not be delivered by 2036?**

The existing housing commitment, which comprises allocations in the Joint Core Strategy (JCS) and sites with planning permission, is substantial at 35,665 homes. There has been a track record of persistent under delivery of housing within the Norwich Policy Area since the adoption of the current JCS. This has necessitated the addition of a 20% buffer to the calculation of five-year supply of housing land in the Norwich Policy Area. Although at this stage we are not putting forward evidence that the commitment will not be delivered by 2036, we do believe that it should be treated with caution and it is therefore essential that an adequate buffer is added to the housing requirement figure in order to mitigate both under delivery of the commitment and of new allocations.

### The Growth Options (options on pg.39-40)

#### **9. Which alternative or alternatives do you favour?**

We broadly support Option 3 'Supporting the Cambridge to Norwich Hi-Tech Corridor' with some variations. These variations relate to the overall level of housing proposed, which we consider should be within the region of 11,000 – 14,000 new homes rather than the 7200 set out within the Growth Options Document. The reasons for the additional requirement are set out in our answers to questions 4-6 above.

To accommodate the additional numbers, Growth Option 3 should be amended to also allocate additional no's (circa 1000 units) to the north and east of Norwich on smaller sites to provide short term delivery in this area. This will supplement larger growth triangle sites where delivery rates have been slow to date and to help provide City Deal housing requirement in association with employment growth around the airport.

#### **10. Do you know of any infrastructure constraints associated with any of the growth options?**

As set out in our answer to Question 7 inevitably with any significant housing and employment growth there will be supporting infrastructure requirements, including new accessible public open spaces. It is essential that these are properly planned for at the outset.

When reviewing the 6 growth options, the delivery of infrastructure by dispersal options becomes difficult. We believe that dispersal Options 4,5 and 6 provide significantly more constraints than Options 1-3.

**11. Are there any other strategic growth options that should be considered?**

**12. Do you support the long-term development of a new settlement or settlements?**

Green Belt

**13. Do you support the establishment of a Green Belt? If you do, what are the relevant “exceptional circumstances”, which areas should be included, and which areas should be identified for growth up to and beyond 2036?**

We do not support the establishment of a Green Belt. This would only serve to push the required housing numbers further into the countryside in order to achieve a protected area around Norwich. This would be unsustainable because it would increase the length and number of journeys into the city and would be likely to have a greater environmental impact on countryside locations.

Norwich City Centre  
Defining the City Centre Area

14. Should the area defined as the city centre be extended?

Strategic City Centre Policy

15. Do you support the approach to strategic planning for the city centre in 4.80 above?

City Centre Offices

16. What should the plan do to reduce office losses and promote new office development in the city centre?

Retailing

17. What should the plan do to promote retailing in the city centre?

Leisure and Late Night Activity Zone

18. Should the focus for late night activities remain at Riverside, Prince of Wales Road, and Tombland, or should a more flexible approach be taken?
City Centre Housing
19. What should the plan do to promote housing development in the city centre? -
Cultural, Visitor and Education Facilities
20. How can the plan best support cultural, visitor and educational uses in the city centre?
Remainder of the Norwich Urban Area and the Fringe Parishes
21. Do you support Option UA1 for the remainder of the urban area and the fringe parishes?
Main Towns
22. Do you know of any specific issues and supporting evidence that will influence further growth in the Main Towns?
Settlement Hierarchy
23. Do you agree with the approach to the top three tiers of the hierarchy?  Yes, this is supported.
24. Do you favour option SH1, and are the villages shown in appendix 3 correctly placed?
25. Do you favour the Village Cluster approach in option SH2?
25a. What criteria should be used to define clusters?
25b. Which specific villages could form clusters?
25c. How could growth be allocated between villages within a cluster?
The Influence of the Norwich Urban Area
26. Do you support a Norwich centred policy area and, if so, why and on what boundaries?
<b>Section 6 – Topic Policies</b> <b>The Economy</b> The Supply of Employment Land
27. What option or options do you support? (refers to options on pg.71-2)

28. Which allocated or existing employment sites should be identified as strategic sites and protected?
29. Are there employment areas that should be identified as suitable for release for residential uses?
30. Are there any new employment sites that should be allocated?
<b>Accommodating Expenditure Growth</b>
31. Should the position of any of the centres in the retail hierarchy be changed?
32. Do any of the existing retail centres have scope to expand to accommodate further floorspace?
<b>The Rural Economy</b>
33. What measures could the GNLP introduce to boost the rural economy?
<b>Access and Transportation</b>
<b>Strategic Transport Issues</b>
34. Are there any other specific strategic transport improvements the GNLP should support?
<b>Promoting Healthier Lifestyles, Sustainable Travel Choices and Greater Accessibility to Broadband</b>
35. Are there other measures that the GNLP can promote to support improved sustainable transport and broadband and mobile networks across the plan area?
<b>Design</b>
<b>Options</b>
<p><b>36. What approach do you support for promoting good design of new development?</b></p> <p>We consider that Option DE1 to broadly continue with the existing design and density policy approaches with some relatively minor changes and updating is appropriate. This approach will support good design. Setting more prescriptive design and density policies is likely to be difficult to achieve across such a large and diverse area and should be approached with caution. Setting a policy that satisfactorily deals with city centre apartment sites as well as rural infill sites both in terms of density and design may create more problems than it solves. We consider that a broad policy is more appropriate and that individual site allocation policies could set more prescriptive</p>



site-specific requirements, backed up by Development Management Policies in each of the Districts and the City.

## **Housing**

### **Minimum Affordable Housing Threshold**

#### **37. Which approach to affordable housing thresholds do you prefer?**

We favour option AH2 that requires only affordable housing on sites of 11 or more dwellings in line with current and expected Government guidance. We object to option AH1 for the same reason.

### **Application of Affordable Housing Percentage Requirements on Sites**

#### **38. What approach do you favour for affordable housing percentages? (refers to options on pg.87)**

We consider that the simpler the affordable housing policy is, the more likely it is to deliver required affordable provision across the Greater Norwich area and to speed up the planning process by eliminating lengthy negotiations on site viability. The affordable housing target for Greater Norwich has not been met on annual basis for the past 5 years at least. It would be interesting to know what the average affordable provision has been across all sites greater than 10 units since adoption of the JCS. It is certainly not 33% as per the aim of the JCS policy. It is noted that paragraph 6.8 of the Growth Options Document states that *“seeking less than 27% affordable housing on all sites above the qualifying threshold risks under-delivery of overall affordable housing targets”*, but under delivery of targets is already happening, even with a higher % target. Lowering the target, could actually increase delivery of **all** housing types.

We consider that if a realistic % of circa 20% was set across all sites above the qualifying threshold, it would eliminate the need for viability challenge except in very exceptional circumstances and would give developers the certainty they need to be able to get on and secure planning permissions for schemes at a viable level. This would eliminate significant delay and cost in the planning process associated with lengthy heads of terms and S106 negotiations and would enable developers to get on and deliver the housing on site. At the present time, the affordable housing levels are frequently a major hindrance to securing timely delivery of both private market and affordable housing

### **Tenure Split for Affordable Housing**

#### **39. Do you support the favoured option for tenure split?**

We object to a one size fits all tenure split approach. It is considered that tenure split should be considered on a site by site basis depending upon local need and upon what Registered providers want to provide and can fund.

### **Rural Windfall, Exception Sites and Small Sites**

**40. Which approach do you think should be taken to rural windfall and exceptions sites? (refers to options on pg.89-90)**

We consider that Option AH7 to allow small scale windfall sites adjacent, or close to settlements with development boundaries is appropriate. These sites should be subject to a criteria-based policy to ensure that they are only permitted where they are acceptable in terms of impact on form and character, landscape setting of the village and are immediately adjacent to settlement boundaries. We consider that where such sites are permitted they could provide for a proportion of self-build plots where there is an identified requirement in the location.

Given the sometimes irregular shape of settlement boundaries in villages we would propose that “close to” be incorporated into the policy.

**Housing Mix – Relative Ratios of House Sizes by Bedrooms**

**41. Which approach to the mix of housing do you support? (refers to options on pg.92)**

We support option AH10 and object to option AH9 as described on the basis that the market will always dictate housing mix delivery based on a known existing demand in each District. Any attempt to apply a blanket housing mix across the entire GNLP area will only serve to frustrate housing delivery and repeat the mistakes of the past that have resulted in missed housing targets and a rolled-up housing need. An overly prescriptive policy is not going to assist in meeting housing delivery targets for any house type.

**Housing with Care, Extra-Care Housing and Retirement Housing**

**42. Which approach or approaches to housing for older people and care accommodation do you favour?**

**Houseboats**

**43. Which of the reasonable alternatives for houseboats do you favour?**

**Gypsies and Travellers**

**44. Which policy approach do you favour to planning for the needs of Gypsies and Travellers?**

**45. Are there any suitable sites for Gypsy and Traveller accommodation you wish to submit?**

**Travelling Showpeople**

**46. Do you support the favoured option for planning for the needs of Travelling Showpeople?**

47. Are there any suitable sites for Travelling Showpeople accommodation you wish to submit?
<b>Residential Caravans/Park Homes</b>
48. Do you support the favoured option for residential caravans and park homes?
49. Are there any potential locations for new/expanded residential caravan sites that you wish to propose?
<b>Climate Change</b>
50. Do you support the favoured option for climate change policy?
<b>Air Quality</b>
How Should Air Quality be Covered in the GNLP?
51. Which approach do you favour for air quality? (refers to options on pg.104-5)
<b>Flooding</b>
How Should Flooding and Flood Risk be Covered in the GNLP?
52. Do you support the favoured option for flood risk policy?
<b>Nature Conservation, Green Infrastructure and Habitats Regulation Assessment Mitigation</b>
How Should Nature Conservation and Green Infrastructure be Covered in the GNLP?
<b>53. Which option do you support? (refers to options on pg.111)</b>
<p>We support a variation of option NC1 where specific housing, employment and a new garden settlement in the Cambridge-Norwich hi-tech corridor are chosen to deliver large areas of strategic green infrastructure. My clients have already made detailed representations promoting a number of sites at Rackheath (to the north of the proposed site), Salhouse, Barford, Caistor St Edmund, Mulbarton, Hethel (the new garden village site) and the land south of Norwich Road (that extends the site being promoted to the north) to deliver a network of new large green spaces including Country Parks linked to housing and new settlement delivery.</p> <p>We consider that the blanket application of option NC1 as an enlarged fixed open space requirement to be delivered on all new housing sites regardless of location, context, scale and viability will not deliver the quantum, or quality, of strategic green infrastructure needed to meet existing shortfalls or offset the impact of planned new housing growth on the Natura 2000 sites</p>

(including the Norfolk and Suffolk Broads) quickly enough. This over-and-above requirement will only serve to frustrate development on viability grounds. Furthermore, this new dispersed network of extra green space on housing sites in conjunction with Whitlingham County Park will also not be sufficiently attractive to mitigate against the inevitable recreational impacts of new growth on the North Norfolk Coast SAC, SPA and Ramsar, The Broads SPA and Broadland SPA and Ramsar. This is evident through the on-going application of a similar extra green space policy in Broadland District Council area that is doing very little to meet overall open space targets/existing deficiencies within the Norwich Policy Area.

We further consider that the pooling of offsite payments as proposed under option NC2 will also not work for the same reasons. The problem being that land on the edge of existing urban areas where sustainable growth is being focused has clear hope value and is therefore typically not for sale for low-value open space and recreation uses.

The clear and obvious way forward is to select specific housing sites as a focus for growth around the City of Norwich that are sufficiently large to accommodate this shortfall and open space requirement and to make open space delivery (quantum, type, equipment required and phasing) a requirement of the allocation in order to provide meaningful Green Infrastructure.

#### **54. Do you think any changes should be made to the Green Infrastructure network?**

We consider that changes need to be made through an expansion of the existing Green Infrastructure network around Greater Norwich. We favour an alternative approach focused around the deliver new large housing allocations enabling the linked delivery a network of new County Parks as a properly costed requirement of development. We have assembled a number of sites in the following locations that are fully costed and can deliver the following as dedicated mixed-use allocations:

- Barford (circa. 150 dwellings delivering 29ha);
- Rackheath (circa. 300 dwellings delivering 32ha);
- Salhouse (circa. 90 dwellings delivering 7ha);
- Hethel (circa. 2000 dwellings as a new garden village delivering 73ha);
- Mulbarton (circa. 180 dwellings delivering 10ha); and
- Caistor St Edmund (circa. 300 dwellings delivering 24.5ha).

This linked housing and new strategic green infrastructure approach will deliver circa 175.5ha of new green infrastructure and open recreational spaces in the form of Country Parks for public use. The County Park locations have been selected as they are all on main road corridors, on the edge of existing sustainable growth settlements and are also accessible to walking, cycling and public transport. See our attached Green Infrastructure Paper at Appendix A for further information.

This smart approach to meeting growth and open space requirements will allow people (both existing and future residents) to live healthier lives in locations that they don't feel the need to escape from at the weekends to reduce the impact to the Natura 2000 sites and on-going and increasing costs to the public purse.

In addition we are also now proposing the development of this site on the south side of Norwich Road, Salhouse that will extend the green infrastructure network outlined above by a further 5ha of publicly accessible green space.

## **Landscape**

Landscape Character and Protection

55. Which of these options do you favour? (refers to options on pg.115)

## **Strategic Gaps**

56. Should the GNLP protect additional Strategic Gaps and if so where should these be?

## **Energy**

57. Should option EN1 be included in the GNLP?

## **Water**

58. Do you support option W1?

## **Communities**

Location of Affordable Housing within Sites

59. Do you support option COM1 for the distribution of affordable housing?

## **Health Impact Assessments**

60. Which option do you support? (refers to options on pg.123)

## **Neighbourhood Planning**

61. Do you support option NP1? If so, which GNLP policies should be "strategic"?

## **Culture**

How Should Culture be Covered in the GNLP?

62. Which option do you support? (refers to options on pg.126-7)

## **The Broads**

63. Do you support option BR1?

**Section 7 – Monitoring the Plan**

Monitoring of the GNLP

**64. Are there any current indicators that should be excluded or included in the GNLP monitoring framework?**

The existing indicators on which the JCS is monitored are considered appropriate to carry forward. Additional indicators that should be included are:

- the proportion of housing delivery that is happening on the allocated sites. At the present time a significant provision of delivery is taking place on 5-year land supply and windfall sites. The proportion taking place on the allocated sites is not understood. In order to assess how effective the plan is, it is considered that this measure is essential.
- the provision of self-build plots, particularly if Policy Option AH7 is drafted to include provision of self-build plots.

Shortfall in Housing Land Supply

**65. Which option do you support? (refers to options on pg.131-2)**

We note the policy Option HLS1 to allow the most appropriate HELAA sites to come forward if there were no 5-year land supply. We are concerned that this approach will be difficult to put into practice. If this approach is taken it will presumably be based upon the development hierarchy but how will locations be prioritised between South Norfolk and Broadland in particular? The level of assessment of HELAA sites is minimal and the onus is on the Councils to undertake this rather than the landowner/developer. It will be difficult to prioritise sites based on limited assessment information, in locations where there are multiple sites available. How will this process be undertaken in a fair and transparent way outside of the Local Plan process? It is therefore questionable whether this approach would actually provide a simpler and quicker process than Option HLS2.

We consider that Option HLS2 requiring a short, focussed review of the local plan to allocate more deliverable sites is the only reasonable approach because it is fair and transparent. This also places the onus upon the promoter to provide evidence regarding site suitability and delivery. The need for such a review should be kept under continuous review based upon annual monitoring reports. This was the approach recommended by the Inspector in relation to housing shortfall in the Broadland part of the NPA for the JCS and JCS policy 22 was put in place for this purpose, although it is noted this has not been implemented.

Continuing to allow planning permissions on a 5-year land supply basis until the short focussed review has been completed is a reasonable approach and if an appropriate buffer is added to the

housing requirement figure during plan preparation (see our response to question 5), then the likelihood of there being insufficient 5 year housing land supply should be minimal in any case.

***General Questions***

66. Are there any other issues relating to the GNLP you would like to raise?

## 6. Site Assessment

The HELAA capacity assessment December 2017 has assessed the suitability and availability of sites for residential development in broad terms by means of a desk top assessment and advice from a range of technical consultees. It identifies potential constraints to development and/or impacts of developing a site which may need further investigation and additional measures to facilitate development e.g. additional infrastructure or mitigation.

We have commissioned more detailed technical assessments on a range of issues from specialist consultants which have been summarised in Section 4 above. These have enabled us to draw more detailed conclusions on the suitability of this site as set out below:

Constraints Analysis	HELAA Assessment	Lanpro Assessment
Access	Amber	Green
Accessibility to Services	Amber	Green
Utilities Capacity	Amber	Amber
Utilities Infrastructure	Red	Amber
Contamination and Ground Stability	Green	Green
Flood Risk	Green	Green
Market Attractiveness	Green	Green
<b>Impacts Analysis</b>		
Significant Landscapes	Amber	Green
Townscapes	Amber	Green
Biodiversity and Geo-diversity	Amber	Green
Historic Environment	Green	Green
Open space and GI	Green	Green
Transport and Roads	Amber	Green
Compatibility with Neighbouring uses.	Green	Green

Lanpro considers that the individual merits of this housing site that is designed to deliver the 5ha extension to the new Salhouse Country Park promoted under separate representations has been wrongly assessed in the published HELAA scoring. We suggest that the above alternative scoring better reflects the site's close proximity to the NNDR and the fact that there are no listed buildings or historic landscapes in close proximity to the site. We contend that this new scoring should be adopted going forwards as being the correct scoring for the site.



## 7. Conclusions

It is demonstrated in this submission that the proposals for the Salhouse Road site (assigned the reference GNLPO491) can deliver much needed new housing and green infrastructure and will contribute to the achievement of sustainable development.

It is further demonstrated that the proposals will deliver much needed green spaces to enhance the natural environment and the village setting and will result in significant net environmental gains.

## 8. Next Steps

The allocation of the site and land to the north promoted under separate representations to deliver the new expanded Salhouse Country Park.



## **Appendix A**

**PREVIOUS SUPPORTING REPRESENTATION INC. GREEN INFRASTRUCTURE  
STRATEGY SUBMITTED TO THE GREATER NORWICH LOCAL PLAN CALL-FOR-  
SITES PROCESS BY LANPRO IN JULY 2016**

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

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**Supporting Representation:  
Green Infrastructure Strategy**

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**July 2016**

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## Issue Sheet

Supporting Representation:  
Green Infrastructure Strategy

July 2016

Prepared by:

Signature:

Name: Ian Reilly

Title: Senior Planner

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Date: 08 July 2016

Approved by:

Signature:

Name: Philip Atkinson

Title: Director

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Date: 08 July 2016

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## **1 Introduction and Background**

### **1.1 Instruction**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

***Requiring good design***

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

***Promoting healthy communities***

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

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

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

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

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

## **2 Growth Considerations**

### **2.1 SHMA**

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

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

## **2.2 Natura 2000 sites**

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

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

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

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

## **2.3 SANG**

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

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

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

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

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

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

## **3 Proposed Sites**

### **3.1 Strategic Locations**

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

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

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

## **3.2 Sustainable Developments**

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

## **3.3 Deliverable and viable**

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

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

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**Supporting Representation:  
Green Infrastructure Strategy**

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**Appendix 1 –  
Sites Location**




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Note

SUMMARY

-  Norwich Policy Area
-  Existing Urban Areas
-  Proposed Sites

Area of Green Infrastructure

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

Map Data © Google 2015

PROJECT TITLE  
Norwich Policy Area Green Infrastructure Strategy

PROJECT NUMBER  
GLA 001-0635

CLIENT

DRAWING TITLE  
Sites Location

DRAWING NUMBER REV  
001 -

SCALE  
1/150000 (A3)

DATE  
JUNE 2016

DRAWN BY  
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001 Site Location  
1/150000 (A3)

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

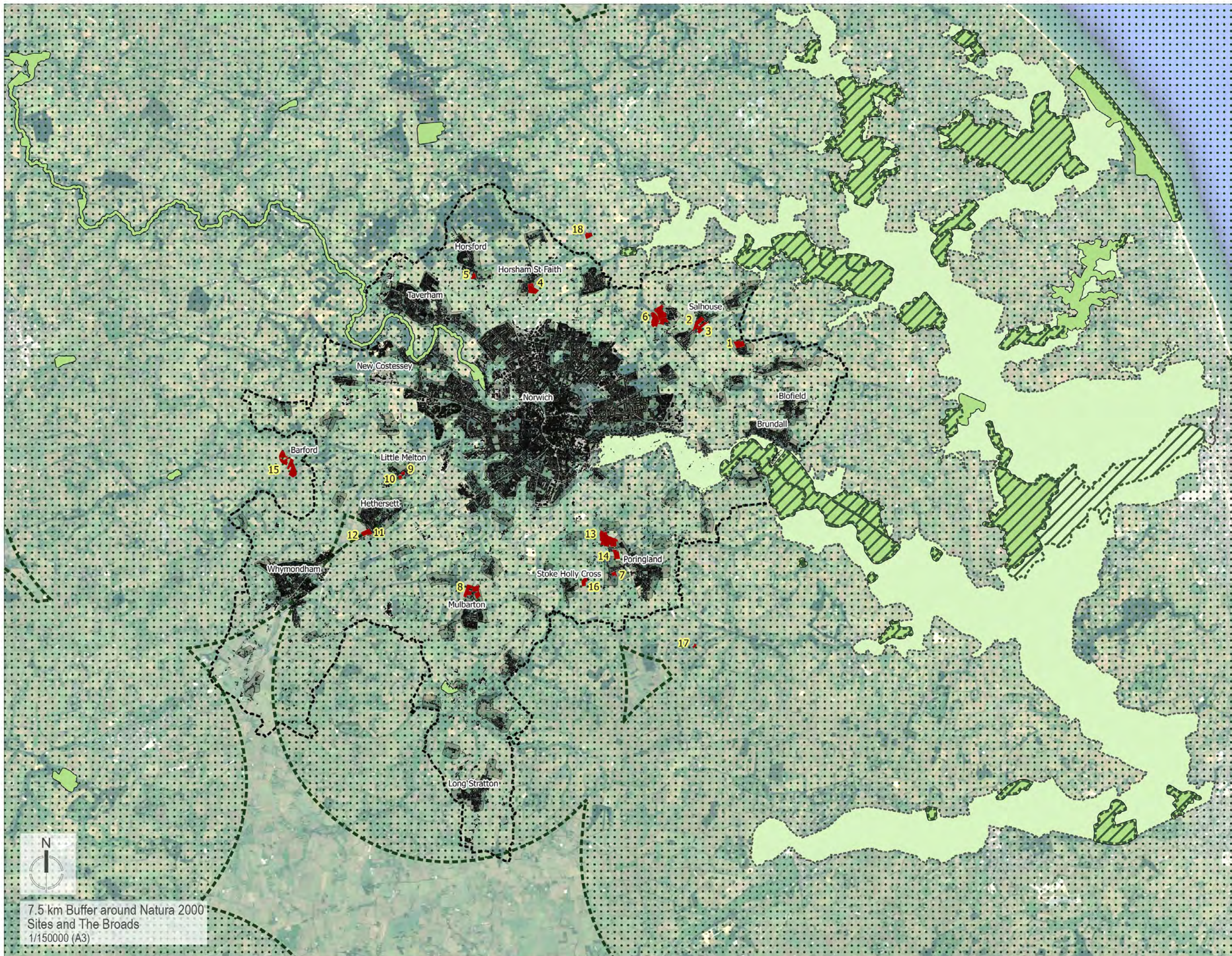
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**Supporting Representation:  
Green Infrastructure Strategy**

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

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Note

SUMMARY

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

Map Data © Google 2015

PROJECT TITLE  
Norwich Policy Area Green  
Infrastructure Strategy

PROJECT NUMBER  
GLA001-0635

CLIENT

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

DRAWING NUMBER REV  
002 -

SCALE  
1/150000 (A3)

DATE  
JUNE 2016

DRAWN BY  
JBA

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

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

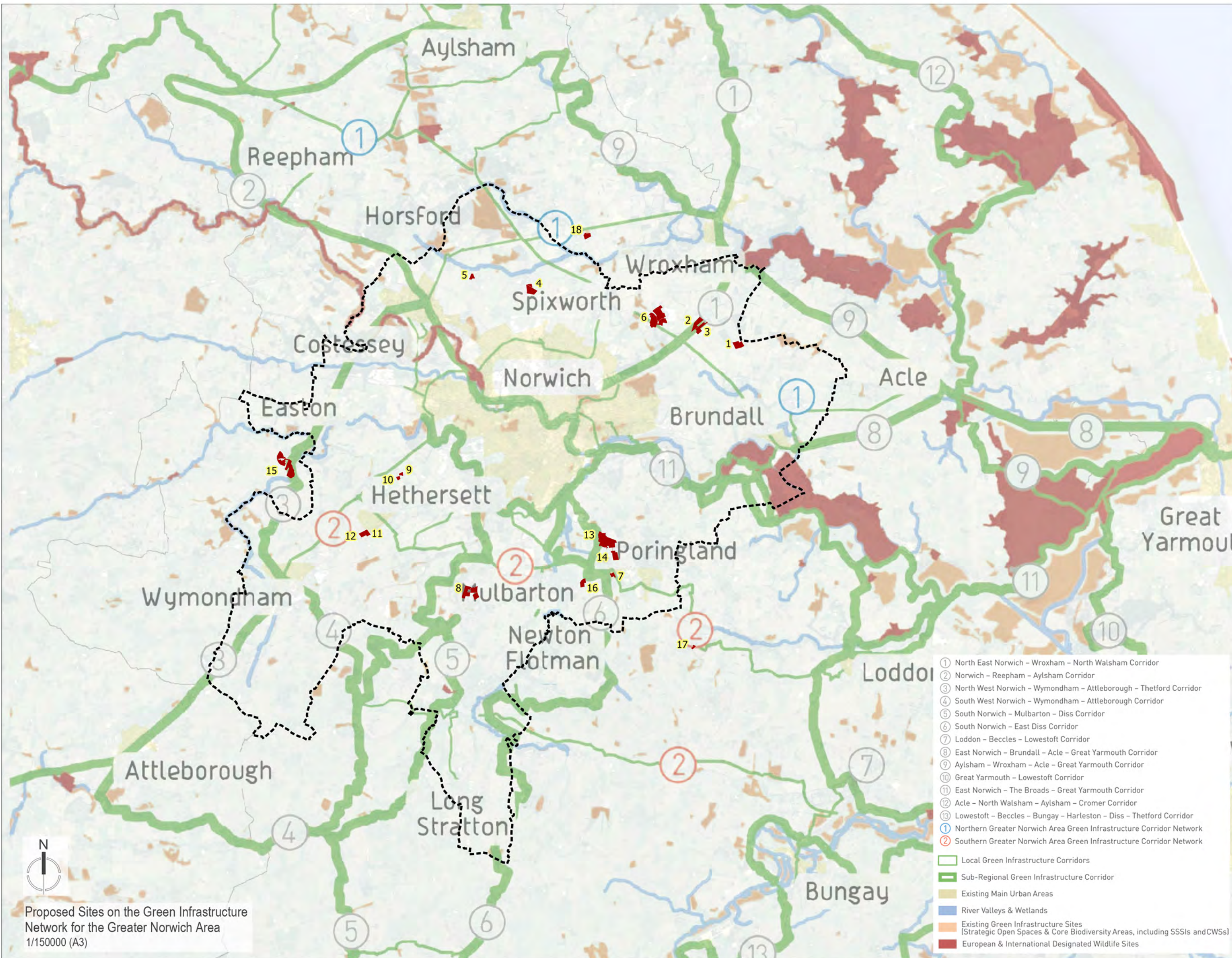
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**Supporting Representation:  
Green Infrastructure Strategy**

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



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

Note

SUMMARY

-  Norwich Policy Area
-  Proposed Sites

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

Map Data © Google 2015

PROJECT TITLE  
Norwich Policy Area Green Infrastructure Strategy

PROJECT NUMBER  
GLA001-0635  
CLIENT

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

DRAWING NUMBER REV  
003 -







SCALE  
1/150000 (A3)

DATE  
JUNE 2016

DRAWN BY  
JBA



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

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

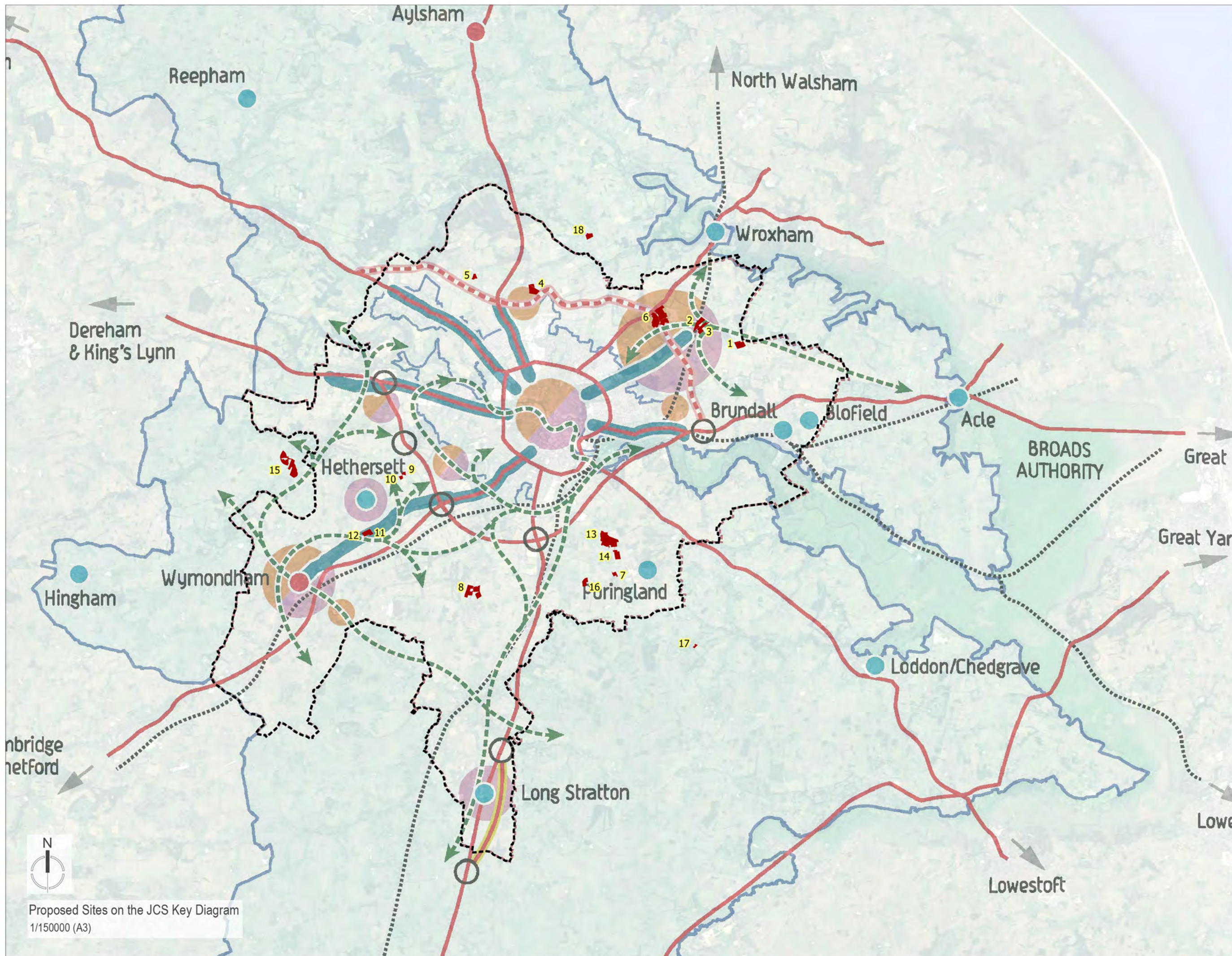
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**Supporting Representation:  
Green Infrastructure Strategy**

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

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

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

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

**PROJECT NUMBER**  
 GLA001-0635

**CLIENT**

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

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

**SCALE**  
 1/150000 (A3)

**DATE**  
 JUNE 2016

**DRAWN BY**  
 JBA

**Lanpro**  
 [Architecture and Urban Design]

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

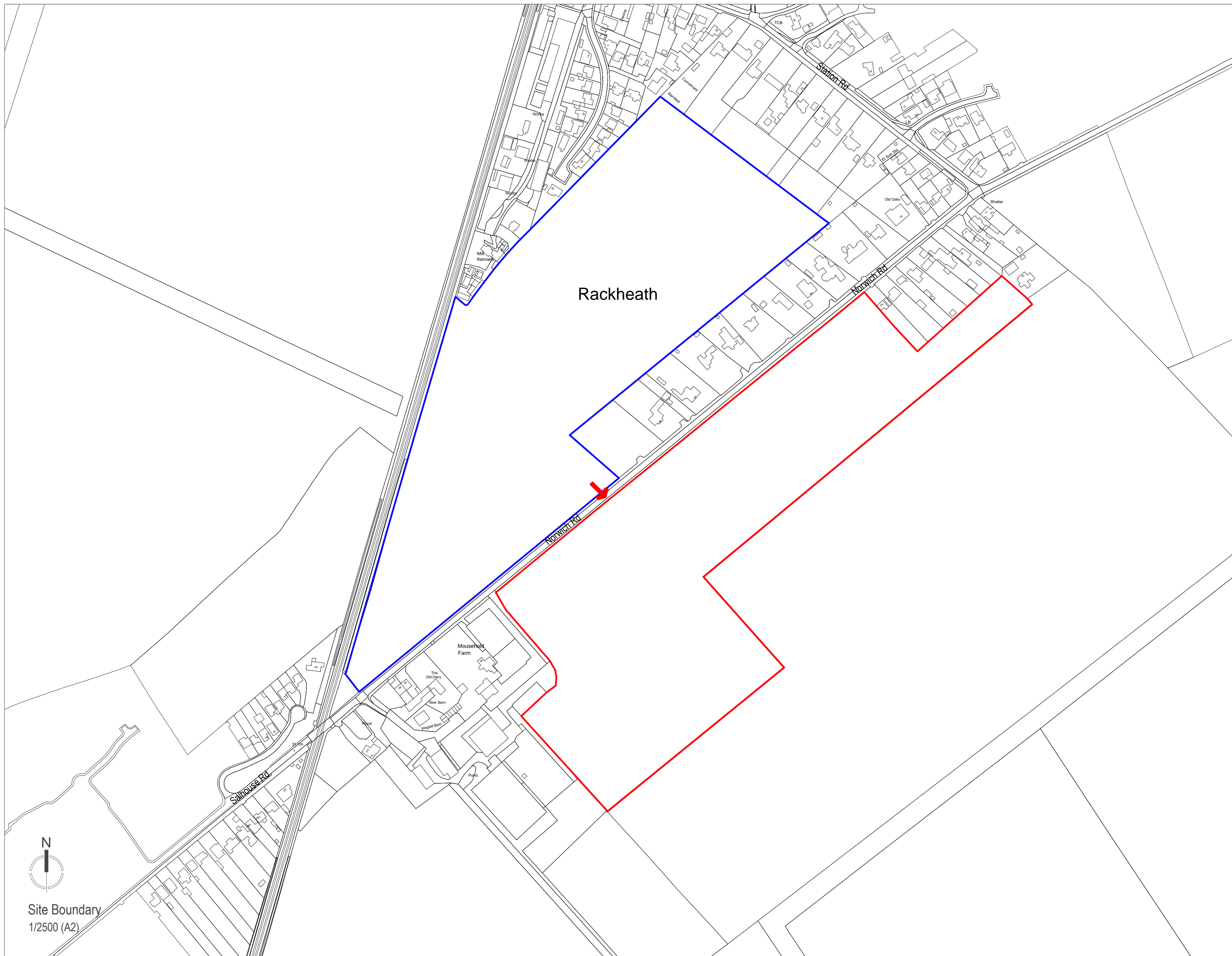
Proposed Sites on the JCS Key Diagram  
 1/150000 (A3)



## Appendix B

### LOCATION PLAN





Note

SUMMARY

- Land Ownership
- Site Boundary
- ➔ Access

Site Area 9.72 Ha

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 Ordnance Survey Licence Number 0100031673

PROJECT TITLE  
 Norwich Rd Development II, Rackheath

PROJECT NUMBER  
 JEA001-0560

CLIENT  
 Dennis Jeans

DRAWING TITLE  
 Site Boundary

DRAWING NUMBER REV  
 001 -

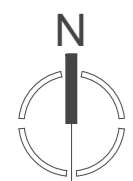
SCALE  
 1/2500 (A2)

DATE  
 JUNE 2016

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 JBA



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Site Boundary  
 1/2500 (A2)



## Appendix C

### INDICATIVE LAYOUT PLAN



Note

SUMMARY

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

Site Area	9.72 Ha
Net Developable Area	3.90 Ha
Gross Housing Density	6Dw@Ha
Net Housing Density	22Dw@Ha
No. Houses	86 Houses
Green Infrastructure	5.09 Ha
Green Infrastructure	52%

PROJECT TITLE  
Norwich Rd Development II, Rackheath

PROJECT NUMBER  
JEA001-0560

CLIENT  
Dennis Jeans

DRAWING TITLE  
Proposal Plan

DRAWING NUMBER	REV
001	-

SCALE  
1/2500 (A2)

DATE  
JUNE 2016

DRAWN BY  
JBA

**Lanpro**  
[Architecture and Urban Design]

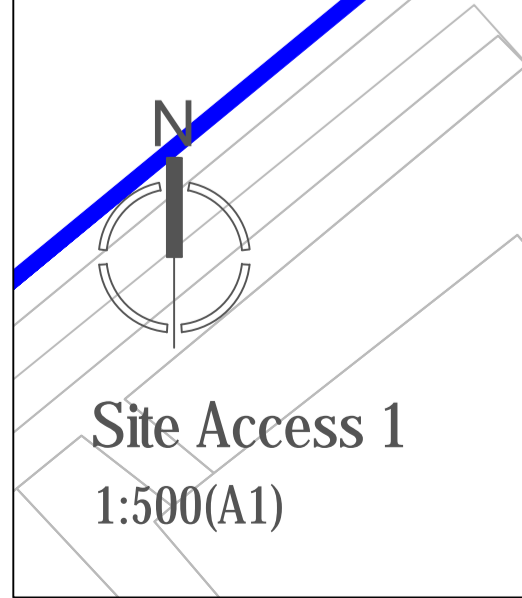
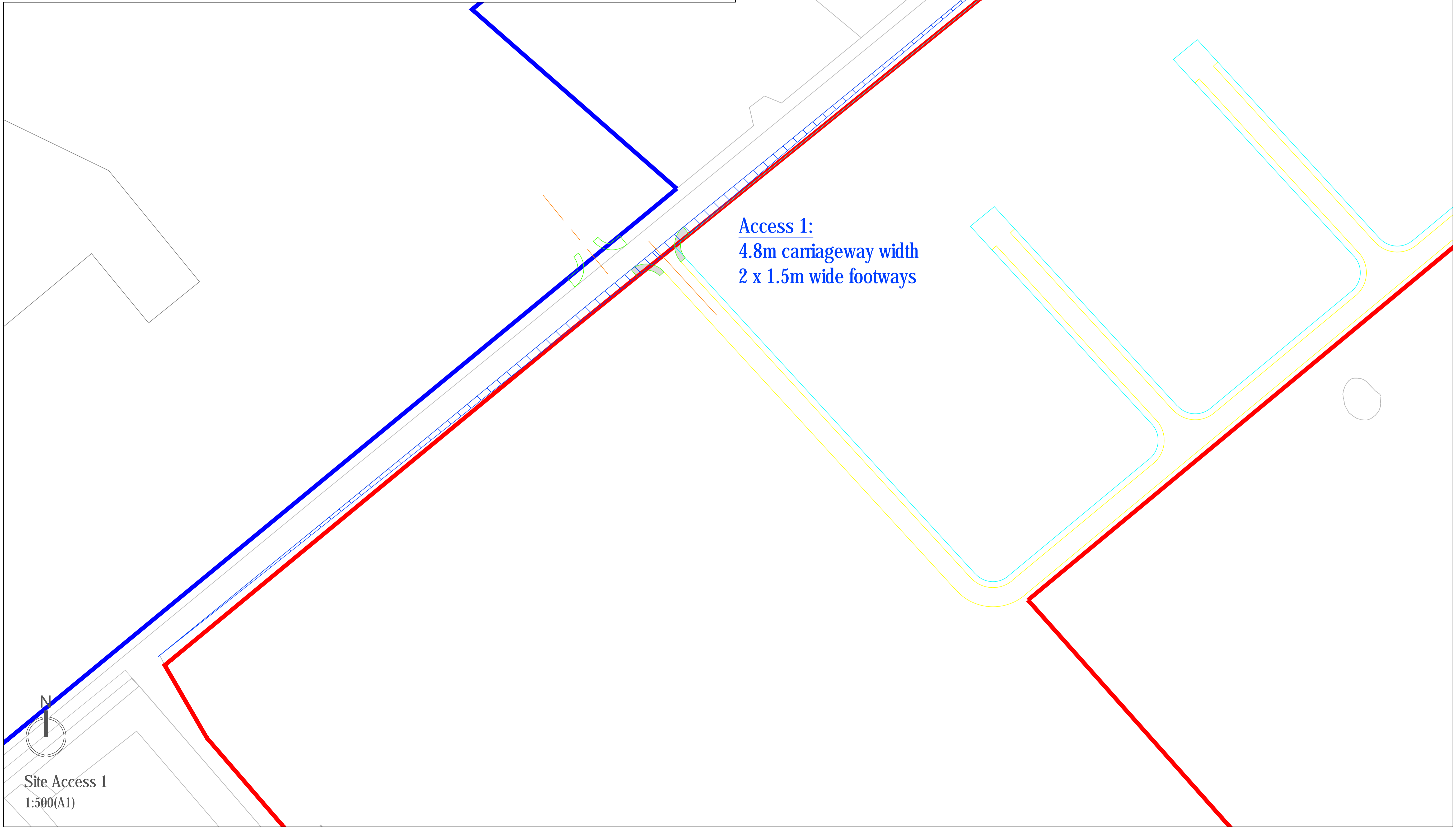
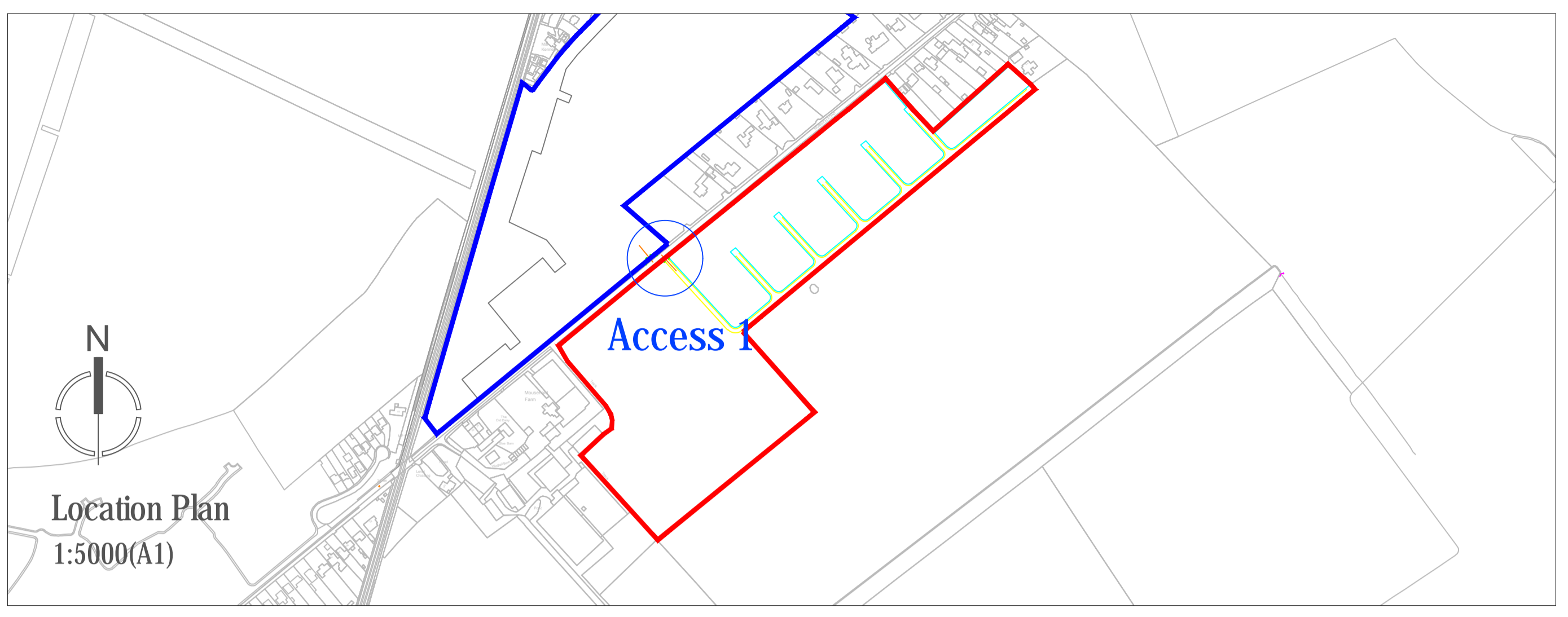
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N  
↑  
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Proposal Plan  
1/2500 (A2)



## Appendix D

### ACCESS DESIGN



Note

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SUMMARY

- Rackheath I Site Boundary (Area: 11.11 Ha)
- Rackheath II Site Boundary (Area: 9.72 Ha)
- Proposed new 1.5m footway
- 2.4m x 160m visibility splay

---

PROJECT TITLE  
**Rackheath II**

PROJECT NUMBER  
**JEA001-0560**

CLIENT

---

DRAWING TITLE  
**Site Access Layout**

DRAWING NUMBER    REV  
**0560/002            -**

SCALE  
**1:500 (A1)**

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DATE  
**June 2016**

DRAWN BY  
**EAE**

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