

REPRESENTATIONS

GREATER NORWICH LOCAL PLAN GROWTH OPTIONS CONSULTATION

On behalf of Westmere Homes

In Respect of:
Land at North East Aylsham

Date:
March 2018

Reference:
GA/AM/03715/S0001

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1.0 INTRODUCTION

- 1.1 On behalf of our client Westmere Homes we wish to make representations to the current Greater Norwich Local Plan (GNLP) Growth Options consultation. This consultation represents the first step towards the review of the adopted Joint Core Strategy (JCS) along with various elements of the local plans of Broadland, South Norfolk and Norwich, in particular those that deal with site allocations and the distribution of growth.
- 1.2 This representation seeks to assess the approach that the GNLP should take towards facilitating appropriate levels of growth with a particular focus on the role that Aylsham should play in accommodating much needed housing in the Broadland rural area.
- 1.3 It culminates in the detailed promotion of our client's land at North East Aylsham for a residential-led mixed-use scheme comprising up to 300 dwellings including provision for live/work or self-build units, a site for a new primary school, land for new community facilities, enhanced highways connections and a substantial linear country park along the banks of the River Bure.
- 1.4 Our response also includes a review of the associated Site Proposals document as well as comments on the accompanying evidence base wherever relevant.

Stakeholder Engagement to Date

- 1.5 This representation is informed by ongoing liaison and detailed discussions with a number of parties including, but not limited to:
 - The Greater Norwich Development Partnership (GNDP);
 - Broadland District Council;
 - Aylsham Town Council;
 - Norfolk County Council Highways;
 - Anglian Water;
 - Aylsham High School; and
 - 1st Aylsham Scout Group
- 1.6 Discussions with the stakeholders listed above have allowed us to formulate a proposal that is not only the correct one for our Client's site but is entirely appropriate in the context of the plan area, Broadland and Aylsham in particular. It has allowed us to focus on key constraints and put forward bespoke solutions. It has allowed us to draw this representation to a conclusion that, based on Aylsham's need and identified ability to deliver significant growth in the Broadland's rural portion of the plan area, our client's land and proposed scheme represents an entirely sustainable form of development at the town.

Supporting Evidence

- 1.7 In total, this representation is supported by the following documents:
 - Site Plan – Proposed, prepared by Jon Boon Architects;
 - Transport Feasibility Assessment, prepared by Motion;
 - Foul Drainage Assessment, prepared by Create Consulting;
 - Agreed minutes of meeting with Broadland District Council, dated 17th January 2018;

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- Agreed minutes of meeting with the GNDP, dated 13th February 2018;
- Note of meeting with Aylsham Town Council, dated 13th February 2018; and
- Letter of support from 1st Aylsham Scout Group, dated 12th March 2018.

1.8 In addition this representation is supported by a number of further discussions that have taken place with the full range of stakeholders listed above, some of which are referred to in the enclosed suite of supporting technical evidence.

PART 1: Response to the GNLP Growth Options

2.0 OVERVIEW

2.1 On behalf of our client, Westmere Homes, we wish to make detailed representations in response to the following questions, sections and documents, set out in the following order:

- ***Q2: Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1 to 4.7?***
- ***Q3: Which option do you support for jobs growth?***
- ***Q4: Do you agree that the OAN for 2017-2036 is around 39,000 homes?***
- ***Q5: Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?***
- ***Q6: Do you agree that windfall development should be in addition to the 7,200 homes?***
- ***Q8: Is there any evidence that the existing housing commitment will not be delivered by 2036?***
- ***Q9: Which alternative or alternatives (for the distribution of growth) do you favour?***
- ***Q12: Do you support the long-term development of a new settlement or settlements?***
- ***Q22: Do you know of any specific issues and supporting evidence that will influence further growth in the Main Towns?***
- ***Q23: Do you agree with the approach to the top three tiers of the (settlement) hierarchy?***
- ***Q26: Do you support a Norwich centred policy area and, if so, why and on what boundaries?***
- ***Q37: Which approach to affordable housing thresholds do you prefer?***
- ***Q38: Which approach do you favour for affordable housing percentages?***
- ***Q65: Which option do you support (in the event of a lapse in housing delivery)?***

2.2 Our client reserves the view to comment on other elements of the plan in future and if pertinent.

3.0 GNLP GROWTH OPTIONS RESPONSES

Q2: Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1 to 4.7?

Summary of response: As will be covered in our more detailed responses to the questions relating to housing and jobs delivery the strategy of the plan should identify economic growth as its central driver. In addition, there should be a greater emphasis on delivery across the plan area, in particular in the more sustainable Main Towns and rural settlements.

- 3.1 Generally we have concerns that the broad strategic approach taken by the plan lacks aspiration and is disjointed in relation to the delivery of a complementary levels of jobs, new homes and supporting infrastructure.
- 3.2 Whilst there are clear sustainability benefits relating to the focus of the majority of planned growth in and around Norwich it should be noted that the rural areas of the Plan comprising parts of Broadland and South Norfolk are increasingly well connected to the urban area. To this end it is important to ensure that the ability of the most sustainable and accessible settlements of the GNLP area to contribute towards jobs and housing growth is exploited to the full. It is important that the Plan avoids the errors made by the JCS of skewing development too heavily towards Norwich and its immediate fringe.

Q3: Which option do you support for jobs growth?

Summary of response: *We fully support the adoption of Option JT1 as the GNLP's preferred approach to jobs growth. This should, however, underpin a wide range of decisions made in the other policies of the plan. In particular sufficient housing growth should be planned for to accommodate the additional jobs required as part of the City Deal.*

- 3.3 We are pleased to note that Option JT1 'Plan to deliver forecast jobs growth plus additional growth' represents the favoured option. An expanded assessment of the jobs required for the plan area is included in our response to Q4, Q5 and Q6 (including the way that this overlaps and significantly influences the housing requirement for the Greater Norwich area).
- 3.4 It is acknowledged that the City Deal commits to facilitate 13,000 more jobs than is targeted in the current JCS. This represents a baseline target of the creation of approximately 45,000 additional jobs in the city region between 2015-2036 (reflective of the conclusions of the aspirational growth scenario included in GVA's Employment, Town Centres and Retail Study 2017). It is vital that this promise is carried through into the Greater Norwich Local Plan to help stimulate economic infrastructure and housing growth, particularly as the reciprocal terms of the City Deal are already bearing fruit.
- 3.5 To help achieve the Greater Norwich Growth Board's (GNGB) ambitions across the plan area the City Deal agreed a strategic infrastructure programme supported through Government-approved access to borrowing at a preferential rate and the local authorities' commitment to pool a significant proportion of Community Infrastructure Levy (CIL) income to form an Infrastructure Investment Fund. This promise has already helped free up sufficient capital to deliver firstly the Northern Distributor Road and most recently has helped secure a commitment to deliver the Long Stratton Bypass.
- 3.6 Aspirational jobs growth and commensurate investment is vital to ensure that Norwich and its hinterland achieves its full potential. To this end an ambitious approach to jobs creation and the growth of the local economy is paramount in the context of the Plan's overall strategy. Indeed, every element of the plan and its eventual strategy should be built on a foundation of aspirational economic growth – it should be an employment-led plan. This will require big decisions to be made in relation to setting housing targets. This is assessed further elsewhere in our representation.

- Q4: Do you agree that the OAN for 2017-2036 is around 39,000 homes?**
- Q5: Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?**
- Q6: Do you agree that windfall development should be in addition to the 7,200 homes?**

***Summary of response:** We support the use of the OAN figure produced using the Government's emerging standard methodology as a basis against which the final housing target of the GNLP should be identified. We do, however, object to the proposed approach to the proposal to use the market signals derived uplift to cater for the additional homes required under the City Deal.*

*Such an approach will continue to exasperate the very matters relating to affordability that the standardised methodology seeks to alleviate. To this end we recommend that the plan should seek to deliver at least **47,349 homes** in the period until 2036 representing a residual requirement on top of existing commitments of **11,700 homes** – the City Deal requirement in addition to the base OAN.*

As the uplift required under the standard methodology seeks to allow for enhanced market choice we do not consider any need to include a further 10% buffer, essentially intended to serve the same purpose.

Due to the need for a high level of certainty in terms of housing delivery this figure should not include windfalls.

- 3.7 These questions have been taken together as combined they warrant a single response in relation to the approach taken towards both identifying and then meeting the housing needs of the Greater Norwich area.
- 3.8 In terms of identifying the Objectively Assessed Need (OAN) figure for the plan period it is understood that the Central Norfolk Strategic Housing Market Assessment (SHMA) was originally prepared to serve this purpose. However, due to Government's recent consultation on a standardised approach to the identification of housing need and the transitional provisions set out in the 'Planning for the right homes in the right places' consultation paper of September 2017 it is now intended to adopt the draft figure produced by the standard methodology as the OAN.
- 3.9 This confirms that some 38,988 homes will be required in the Greater Norwich area over the period 2017 to 2036. This represents 10,032 homes in Broadland, 11,438 homes in Norwich and 17,518 homes in South Norfolk. This approach appears to be pragmatic and sensible, albeit it is important to recognise that the standardised methodology only exists in draft form. It is also important to recognise the limited range of factors that the standardised methodology takes into account when arriving at its conclusions on annual need.
- 3.10 We are in agreement with the conclusions of the Growth Options paper in terms of the identification of the correct base for the OAN. Where we then disagree is with its recommendations in relation to the way that the plan's final housing figure is to be calculated. This centres around the proposed approach to conflate the additional homes required to meet the uplift on demographically derived need derived using the affordability formula and those anticipated to meet the additional requirement generated by the City Deal.

3.11 The Growth Options document confirms that the approximate 400 dwellings per year uplift included in the figure derived via the standard methodology is also expected to cater for the majority of the 8,361 additional homes required because of the City Deal (SHMA April 2017). This represents a continuation of the way that the previous OAN figure set out in the April 2017 SHMA was intended to relate to the City Deal requirement.

3.12 The report prepared for the meeting of the Joint Committee appointed to oversee the delivery of the GNLP, dated 23 June 2017, confirms in its recommendation to members:

"OAN 2015-2036: 39,486 (or 1,880 per year): This OAN figure includes an uplift of 3,133 dwellings, above demographically derived need, to address "market signals". Uplifts are not cumulative so this also addresses part of the increased demand for housing that would be generated if the City Deal jobs targets can be met. The total City Deal job uplift equates to 8,361 homes so the OAN includes about 37% of this."

3.13 We would challenge the assertion that "uplifts are not cumulative" – the circumstances of the GNLP would suggest that this statement appears to sidestep major issues relating to the anticipated future demand for housing in the plan area. Indeed, in the context of the OAN figure derived from the standard methodology this statement fails to grasp the crux of what the Government are seeking to achieve. The figure produced by the formula considers two factors only – natural rates of household formation and local affordability factors. It solely intends to overcome existing housing market pressures by introducing choice to consumers.

3.14 The Government's resultant figure then represents a minimum requirement for each local authority. The uplift created by this formula relates to the application of a local affordability ratio only a seeks to principally overcome issues relating to existing market pressures. Such pressures will be influenced by the unique existing characteristics of the GNLP area such as deficiencies in recent supply, heightened demand generated by disproportionate jobs growth and enhanced levels of accessibility to major jobs centres outside the HMA such as Cambridge and London. The standardised figure will not have had sight of the impact on emerging housing need brought about by additional future trends relating to delivery of increased employment or infrastructure for example.

3.15 The draft additions to the Planning Practice Guidance suite published by the Government in March 2018 describe this position neatly:

"The need figure generated by the standard method should be considered as the minimum starting point in establishing a need figure for the purposes of plan production. The method relies on past growth trends and therefore does not include specific uplift to account for factors that could affect those trends in the future. Where it is likely that additional growth (above historic trends identified by household projections) will occur over the plan period, an appropriate uplift may be applied to produce a higher need figure that reflects that anticipated growth. Circumstances where an uplift will be appropriate include, but are not limited to; where growth strategies are in place, strategic level infrastructure improvements are planned, funding is in place to promote and facilitate growth (i.e. Housing Deals, Housing Infrastructure Fund)."

3.16 The GNLP falls squarely in the domain of the draft guidance. Whilst it is acknowledged that there is no mandatory requirement to include the additional 8,361 homes required as a result of aspirational strategies such as the City Deal in any eventual OAN figure it would be irresponsible not to acknowledge and plan for this uplift in full above and beyond the Government's base figure. To seek

to accommodate a level of growth only marginally in advance of the OAN figure itself would only serve to exacerbate, rather than alleviate, issues with affordability across the plan area. This is particularly true in the more desirable rural areas due to the commuting and workplace / residence trends described in our response to Q9, below.

- 3.17 Concerns in relation to affordability within the city's hinterland are increased when the nature of the resultant in-migration is considered. This would essentially comprise an influx of qualified, professional and generously paid workers moving to the area to assume a range of higher value tech and service jobs being promoted through the various economic strategies in place across the East of England. Recent trends suggest that such a flow of workers is already distorting the local housing market in rural Broadland and South Norfolk.
- 3.18 Currently, the affordability ratio of average house price to median earnings is high across all three authorities – 9.22 in Broadland, 6.26 Norwich and 8.31 south Norfolk. This is likely reflective of the success of the New Anglia Strategic Economic Plan to create jobs but its failure to deliver a similarly aspirational level of new homes to accommodate economic in-migration (summarised on pages 6 and 7 of the SEP Impact Report July 2016). Ultimately the creation of a high number of jobs accompanied by constrained or stalling housing delivery will push up demand and hence impact adversely on affordability.
- 3.19 Demand created by drivers such as aspirational economic growth must be included on top of the identified OAN to ensure that the rise in local house prices is tempered. It should not be subsumed within it - the approach described by paragraph 4.19 of the consultation document.
- 3.20 In addition, paragraph 2.3.38 of the Interim Sustainability Appraisal warns that economic growth could be restricted without a complementary suite of land use policies that support housing and infrastructure needs such as could be provided by the GNLP. A full 'policy on' approach that specifically seeks to recognise and deliver the additional 8,361 home requirement generated by the City Deal is essential to avoid the continued escalation of house prices across the GNLP area and the stifling of what is currently a buoyant local economy. This would be entirely in accordance with the preferred option JT1 set out in the consultation document's summary of Q3.
- 3.21 As an absolute minimum we would recommend that the plan's housing target is set as **47,349 homes** representing the OAN calculated using the Government's standard methodology plus the uplift anticipated as part of the City Deal (38,988 homes plus 8,361 homes). Past this point we consider it reasonable to conclude that the 400 homes per annum uplift built into the base OAN plus the strategic uplift represented by the City Deal requirement would negate the need to include an additional 10% buffer – indeed both are effectively proposed as mechanisms to ensure market choice and alleviate issues in relation to affordability. This would result in a residual requirement of 11,684 homes for the plan period, rounded to **11,700 homes**.
- 3.22 In terms of the question relating to how windfall sites are considered in the plan it is important to recognise that the housing need figure should be treated as a minimum. It is also incumbent on the plan to ensure the GNLP's policy framework does everything it can to boost the supply of housing and alleviate local issues in relation to affordability. To this end the homes required to meet this need must be planned for with a high level of certainty – the residual requirement of 11,700 homes should be met in total by a range of deliverable and developable allocations that will be able to come on line throughout the plan period.

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- 3.23 Windfall sites should then be treated as exactly that – unexpected additions. Whilst previous trends relating to windfall delivery may indicate that such a supply will continue to come forward brownfield land is inherently finite as old industrial sites are redeveloped, gaps are closed and frontages are completed.

Q8: Is there any evidence that the existing housing commitment will not be delivered by 2036?

***Summary of response:** At this stage we cannot conclude that the delivery of the existing housing commitments described in the Site Proposals document are incapable of being delivered prior to 2036 – there will inevitably be significant shifts in both market demand and the size of the construction sector labour force throughout the plan period.*

What we can conclude, though, is that the front-loading of the delivery of these sites set out in the current AMR trajectory within the first 10 years of the plan period is entirely unrealistic. To this end the emerging GNLP requires an urgent policy response to allow a series of smaller and more deliverable sites to come forward in the early years of the plan period to supplement more strategic growth around the Norwich Fringe.

- 3.24 The realisation of a significant element of the housing proposed by the Plan is reliant on the delivery of existing strategic allocations within the Norwich Policy Area (NPA) in their entirety within the period until 2036. Whilst there is a possibility that these commitments may be delivered in full by 2036 it is our view that such a reliance on strategic sites all in and around the Norwich Urban Area will pose problems in relation to meeting annual housing needs in the short term.
- 3.25 The most recent published housing trajectory available on the GNGB's website relates to the 2015/2016 Annual Monitoring Report (AMR) for the Greater Norwich Area. This demonstrates that only around 25% of the new homes committed in the NPA (by way of planning permission, allocation or both) are expecting to be delivered in the later years of the plan period – approximately 7,000 homes between 2026 and 2036 with the annualised rate of delivery within this period unknown.
- 3.26 This follows a significant step change in the number of units delivered annually in the first ten years of the plan period with the annual figure peaking at 3,740 homes within the NPA alone (not even across the entire plan area) in monitoring year 2020/21. This then tails off to just over 2,000 in 2025/26. We describe this as a step change (put mildly) as the 2020/21 figure represents more than a 200% uplift on the number of homes delivered in the most active monitoring year in the 2011 to 2016 period – 1,164 units in 2015/16.
- 3.27 It is appreciated that the 2020/21 period will represent a point at which the majority of the plan's largest allocations benefit from full detailed consent. It does, however, seem a stretch of the imagination that such a high number of homes will be delivered on an annual basis within the core of a single housing market area. This seems particularly optimistic when compared to delivery rates during 2015/16, a year where the housing market was at its most buoyant since pre-recession times. It also seems convenient that 2020/21 represents the final year in the current housing supply monitoring period.
- 3.28 We would in fact turn the scenario presented by the most recent trajectory on its head – that most units within the NPA will in fact be delivered in the second half of the plan period. The balance of delivery would be expected to take place once all local and strategic supporting infrastructure is in place and once the pipeline of new jobs and sectors proposed within the City Deal begins to flow, including the 6,000 jobs in construction, creating an increased supply of labour and a sustained demand for housing.
- 3.29 In addition, based on the quantity of housing delivery the market itself can sustain – both in terms of the capacity of the local labour supply chain and the effect of a rapid increase in supply would have

on house prices - we would also expect to see annual completions within the NPA hit a ceiling. Allowing for an uplift in the rate of delivery following the completion of the full network of strategic road infrastructure proposed within the NPA, plus a level of added impetus provided by the pipeline of new jobs expected as part of the City Deal, it is suggested that the annual rate of delivery would struggle to pass the 2,000 dwellings per annum mark. This is still significantly short of the level of delivery anticipated in any of the next 10 monitoring years.

- 3.30 Taking 2,000 dwellings per annum as an indicative level of delivery for the remainder of the plan period it could be concluded that all the commitments in the NPA are capable of being delivered prior to 2036 dependent on the timely delivery of detailed planning consents and necessary supporting infrastructure. Where we fundamentally disagree with the most recent trajectory is the assertion that the majority of this growth will be delivered within the first 10 years of the plan period. Such a vast, and immediate, escalation in delivery within the NPA is simply unrealistic.

Q9: Which alternative or alternatives (for the distribution of growth) do you favour?

***Summary of response:** We recommend the adoption of a combination of Growth Options 2 and 3, focusing on the delivery of new homes and infrastructure that best meet the needs of the local jobs market. Such an approach should be centred around an expanded NPA, that now includes the Main Town of Aylsham, with a greater level of disaggregated growth planned for around the more sustainable rural settlements of the plan area.*

- 3.31 Whichever growth option is selected, it must place far more emphasis on the delivery of new homes in and around the more sustainable settlements within the Broadland and South Norfolk rural areas than featured in the current adopted development plan. This should be done with the intention of alleviating issues relating to affordability in both Districts.
- 3.32 It should also be recognised that, as set out in the most recent SHMA, Norwich's sphere of influence in terms of commuter patterns and domicile locations of Norwich's workforce spreads far wider than the immediate Norwich fringe. Paragraph 2.3.32 of the Interim Sustainability Appraisal confirms that Norwich, and its immediate hinterland, strongly influences commuting patterns; the Central Norfolk Housing Market, which is based on the Norwich travel to work area, extends as far as Cromer, Swaffham, Eye and the eastern fringe of Great Yarmouth. The extent of the travel to work area is characterised by desirable towns and villages located on a main transport link to Norwich and within an approximate 1-hour commute to the City Centre.
- 3.33 Based on the above travel patterns it is clear that, regardless of the level of growth implemented in and around the immediate fringe of the city, there is a strong trend towards in-commuting from all corners of its hinterland. The preferred growth option selected within the GNLP must recognise this and cater for the nature of the local housing market. It is understood that these patterns and the resultant pressures on the local housing market have recently been recognised by South Norfolk Council in particular, with its Leader, Cllr John Fuller, providing strong support for an increased level of dispersal of growth across the Plan area.
- 3.34 On this basis we support a spatial strategy that identifies the role that the most sustainable and best connected rural growth points can play in providing homes for the workforce of Norwich. This should be framed around a combination of Option 2 'Transport corridor focussed' and Option 3 'Cambridge and Norwich Tech Corridor focussed' that combined would achieve the following:
- The apportionment of growth towards the most sustainable and accessible towns and villages across the plan area, settlements that are particularly under strain from the high levels of demand placed on them by commuters and would benefit from increased choice in the local housing market;
 - Best utilising the additional finance for infrastructure drawn down as part of the City Deal, development of stronger linkages between the Norwich Urban Area and its outlying larger towns and villages;
 - The ability to identify a wider range of sustainable and deliverable sites to meet the housing needs of Norwich's Core HMA away from the under-performing strategic sites located within the current Norwich Policy Area (NPA);
 - An orientation of additional growth away from the stalling Growth Triangle quadrant of the NPA; and
 - The ability to deliver homes in locations that would support both the jobs required as part of the City Deal as well as a prosperous and thriving rural economy.

- 3.35 The area defined by this spatial approach to growth, characterised as having Norwich at its core with direct road links to the larger market towns, should form the basis of an updated NPA, described in our response to Q26, below. This would see a continuation of the urban focussed approach to growth as included in the JCS but with a greater emphasis on additional delivery in the network of larger towns and villages within Norwich's immediate catchment. The most critical issue faced by the plan is to ensure a sufficient level of housing delivery on an annual basis throughout the entire plan period. This test will become all the more compelling upon the implementation of the Government's 'housing delivery test', described in the draft NPPF.
- 3.36 The Main Towns and Key Service Centres of the plan area should serve as the focal point for a substantial level of sustainable growth delivered on a variety of sites ranging from 50 to 300 dwellings, the smaller of which can be delivered quickly with the larger sites offering a level of viability that can provide significant enhancements to local infrastructure and existing transport links. This should be complemented by a wide-ranging series of smaller local-level allocations in some of the more substantial and/or sustainable other villages of the plan area.
- 3.37 Currently the maximum level of growth allocated to the Main Towns under any one option is the figure included as part of Option 2, 1,650 homes to be distributed between Aylsham, Diss, Harleston, Wymondham and Long Stratton (once planned growth is delivered).
- 3.38 Taking into account our response to Q4, Q5 and Q6, which identifies a housing requirement for the plan area which is approximately 60% higher than that already provided for in the consultation document this figure should be proportionately increased to approximately 2,750 homes across the four Main Towns. This would result in a basic housing allocation for each Main Town (Long Stratton included) of approximately 550 dwellings, a figure that should then be adjusted considering a range of issues including: availability of suitable sites; recent growth, including outstanding consents; strategic constraints; size of rural hinterland served; opportunities to deliver additional infrastructure; and connectivity with Norwich.
- 3.39 It is recommended that the Main Towns proposed to fall inside the NPA (specifically Aylsham, Wymondham and Long Stratton) should, by default, be expected to deliver growth in excess of this figure due to their functional relationship with the Norwich Urban Area and their place within the city's core HMA.
- 3.40 In addition, Aylsham, as the only 'Main Town' within Broadland and the only settlement at this tier of the hierarchy to the north of Norwich, should be viewed as a notable rural growth point in the Plan. It comprises a wide range of shops, services and community facilities capable of supporting significant levels of additional growth. A sustainability plan showing the full range of key services in the town is included at Appendix C of the enclosed Transport Feasibility Assessment. It is well connected to the strategic road network with the A140 providing immediate road and public transport links north to Sheringham and south to Norwich city centre.
- 3.41 This assessment of Aylsham's role in the strategic hierarchy along with its growth potential would lend support to site allocations at the town that would deliver a number of dwellings likely in excess of the 550-home starting point over the plan period. On this basis it is our view that Aylsham should appropriately accommodate approximately 750-1,000 homes, suitable land for the majority of which is identified within the HELAA including our Client's land to the north east of the town.

Q12: Do you support the long-term development of a new settlement or settlements?

***Summary of response:** No. The planned delivery of a significant level of additional growth around what is in effect an entirely new strategic allocation, albeit one largely unconnected from vital infrastructure, would further exacerbate delivery rates across the plan area. There is strong evidence to suggest that new settlements have a lead in of approximately 10-15 years before any new homes are delivered.*

- 3.42 Our response to Q4, Q5 and Q6 has identified that the likely housing requirement for Greater Norwich will be significantly greater than first thought with a residual requirement almost double that set out at paragraph 4.21 of the consultation document – approximately 11,700 homes. To this end there will be a need to investigate all vehicles for housing delivery, including new settlements, to ensure a consistent and high level of annual completions throughout the plan period.
- 3.43 What is important, however, is an understanding of the lead in times required to deliver new settlements which often only see first completions on site at the very earliest 10 years after the land is first allocated. Examples such as Northstowe, a planned new village near Cambridge, serve to highlight the significant delays involved in implementing such proposals.
- 3.44 The site of Northstowe was first allocated in the 2003 Cambridgeshire & Peterborough Structure Plan with an Area Action Plan confirming design and delivery principles in 2007. In parallel the first outline planning application was submitted in 2005. Due to issues relating to Government funding for supporting strategic infrastructure this application was never determined. A consent for the first phase was only eventually secured in April 2014. This followed a two-year period of relating to the associated S106 legal agreement. Detailed consent was granted in 2016 and the first units on site were finally completed in May 2017. From first allocation to first completion it took some 14 years to finally deliver. The delivery of new settlements is extremely complex and the point at which they can contribute to a Council's housing trajectory is almost always too optimistic.
- 3.45 Whilst we recognise a need for creative strategic thinking to ensure the plan can deliver a significant increase in housing it is vital that it recognises that new settlements represent very long-term delivery options. The inclusion of a new settlement as part of the plan's spatial strategy would very much represent a vehicle for housing provision at a latest stage in the plan period, something that we consider is already catered for by the range of strategic allocations to be carried forward (see our response to Q8).
- 3.46 In the meantime, and to reiterate, it is of utmost importance that a wide range of deliverable sites are allocated to meet the needs of the Greater Norwich area in the earliest years of the plan period.

Q22: Do you know of any specific issues and supporting evidence that will influence further growth in the main towns?

***Summary of response:** It is noted that the key constraint identified in the Growth Options document's synopsis of Aylsham relates to waste water capacity. To this end we include evidence with this representation that concludes that this should not be considered to constrain capacity in the town. Indeed, the delivery of our recommended growth figure for the town of approximately 750 dwellings at the town would be entirely unconstrained on the basis of sewerage capacity.*

- 3.47 It is noted on pages 47 and 48 of the Growth Options document that Aylsham is identified as a sustainable location for further housing delivery, comprising a good range of services and facilities and significant level of employment at the Dunkirk Industrial Estate. It does, however, identify waste water disposal issues as a potential constraint to future growth in the town.
- 3.48 Accordingly, Westmere Homes have investigated this matter further. A report is included in support of this submission setting out the findings of Create Consulting, that this should not prove a constraint to the allocation of new homes at the town including the suggested allocation of a minimum of 750 homes set out at our response to Q9. Create's report is aided by ongoing dialogue with Anglian Water that first began in 2012 when investigating the delivery of the Bure Meadows development on the east of the town.
- 3.49 In summary it is concluded that sufficient capacity exists at the Aylsham Waste Water Treatment Works (WWTW) to accommodate flows produced by whatever level of growth is allocated to the town. Physical capacity exists at the northern end of the site to deliver additional treatment facilities with proposals for the upgrade of the works anticipated for inclusion in Anglian Water's next Asset Management Plan (AMP) covering the period from 2020 onwards. Even if not included in the AMP this upgrade would likely be prioritised depending on the decisions made within the GNLP with agreed capital expenditure able to be diverted to cover more urgent project work. To this end the upgrade of the WWTW could be secured within the first five years of the plan if early delivery of housing in and around Aylsham is considered a priority.
- 3.50 Even in the event that potential delays occur to the upgrade of the WWTW it is possible that that on-site solutions could accompany the delivery of any major residential proposals at the town. A smaller standalone works could be provided which deals with site-specific flows and supplements the local network of waste water treatment.

Q23: Do you agree with the approach to the top three tiers of the (settlement) hierarchy?

Summary of response: *Partially. We recommend that the hierarchy is further split to recognise the Main Towns and Key Service Centres that fall both inside and outside of the NPA – the presumption being that the strong functional connection of the settlements falling within the NPA with Norwich should see them considered as appropriate locations for increased growth.*

- 3.51 The settlement hierarchy as proposed is a logical starting point. As referred to in response to Q9, however, there would be benefit in separating the Main Towns and Service Centres into two further tiers – in each instance differentiating between those that lie within the proposed NPA (see Question 26) and those that fall outside.
- 3.52 There should be a general presumption that those settlements which fall within the NPA have stronger functional and physical links with the Norwich Urban Area and theoretically (subject to other growth constraints) benefit from a level of infrastructure sufficient to support significant growth. Importantly these settlements also fall within the Core HMA, the source of most of the housing need identified within the HMA and within which the majority of the growth should occur.
- 3.53 To this end the top three tiers of the hierarchy should be split into five, as follows:

Hierarchy tier	Locations and settlements	Criteria and growth considerations
1. Norwich Urban Area	Norwich, the built-up parts of the fringe parishes of Colney, Costessey, Cringleford, Trowse, Thorpe St Andrew, Sprowston, Old Catton, Hellesdon, Drayton and Taverham and the remainder of the Growth Triangle.	<p>Defining criteria Access to a full range of high level and day-to-day services and employment opportunities.</p> <p>Growth considerations Therefore, suitable for infill (within defined development boundaries) and housing allocations, the scale of which would be dependent on site availability, the growth option chosen and local environmental and infrastructure considerations.</p>
2. Main Towns in NPA	Aylsham, Wymondham and Long Stratton	<p>Defining criteria Towns lying within the NPA with local access to a range of day-to-day services and employment (schools; healthcare facilities; retail, including a supermarket; comparison goods shopping; a range of employment; other services; and frequent public transport) with additional strong links to the Norwich Urban Area.</p> <p>Growth considerations Therefore, suitable for infill (within defined development boundaries) and larger strategic housing allocations including additional community infrastructure, the scale of which would be dependent on site availability, the growth option chosen and local environmental and infrastructure constraints with an</p>

		additional emphasis on the identification of highly accessible locations for growth.
3. Main Towns in Rural Area	Diss and Harleston	<p>Defining criteria</p> <p>Towns with local access to a range of day-to-day services and employment (schools; healthcare facilities; retail, including a supermarket; comparison goods shopping; a range of employment; other services; and frequent public transport).</p> <p>Growth considerations</p> <p>Therefore, suitable for infill (within defined development boundaries) and housing allocations, the scale of which would be dependent on site availability, the growth option chosen and local environmental and infrastructure constraints.</p>
4. Service Centres in NPA	Acle, Blofield, Brundall, Hethersett, Loddon/Chedgrave, Poringland/Framingham Earl, Reepham	<p>Defining criteria</p> <p>Settlements lying within the NPA with local access to some services and employment opportunities (a primary school; an accessible secondary school; healthcare facilities; day-to-day retail and services; local employment; frequent public transport) with additional strong links to the Norwich Urban Area.</p> <p>Growth considerations</p> <p>Therefore, broadly suitable for infill (within defined development boundaries) and larger housing allocations, the scale of which would be dependent on site availability, the scale and range of local services (higher levels of growth would tend towards locations with a secondary school); the growth option chosen; and local environmental constraints. The functional relationship of the settlement with Norwich would tend towards the delivery of larger sites.</p>
5. Service Centres in Rural Area	Hingham, Wroxham	<p>Defining criteria</p> <p>Settlements with local access to some services and employment opportunities (a primary school; an accessible secondary school; healthcare facilities; day-to-day retail and services; local employment; frequent public transport).</p> <p>Growth considerations</p> <p>Therefore, broadly suitable for infill (within defined development boundaries) and housing allocations, the scale of which would be dependent on site availability, the scale and range of local services (higher levels of growth would tend towards locations with a secondary school); the growth option chosen; and local environmental constraints.</p>

Q26: Do you support a Norwich centred policy area and, if so, why and on what boundaries?

Summary of response: Yes, for the purposes of properly distributing growth and focusing investment. No, for the purposes of measuring a 5-year supply of housing land. To this end we are pleased to see that this view is reflected by the preferred approach of the GNLP.

- 3.54 Yes, for the purposes of properly distributing growth and focusing investment. No, for the purposes of measuring a 5-year supply of housing land.
- 3.55 As set out in our brief response to Q2 it is reasonable and realistic that the majority of growth, both in terms of housing delivery and job creation, should have a strong nexus with the Norwich urban area. To this end we would support the retention of a Norwich centred policy area as a focus for investment and as an area governed by a suite of policies allowing for significant growth in and around the city and the most sustainable and best-connected settlements falling in its hinterland. This view interacts with our response to the questions above relating to the spatial distribution of growth and the settlement hierarchy.
- 3.56 When determining the extent of the NPA it would be reasonable to correlate this with the Core Market Area included in the SHMA, defined as the area with the strongest functional connection to the Norwich Urban Area. This is also the source of the majority of housing need identified within the HMA and represents the area that should appropriately assume the greatest level of growth. Indeed paragraph 1.6 of the SHMA identifies that the Core Market Area and the current NPA have broad similarities, albeit the Core Market Area represents its extension to encompass additional larger settlements located on the main road network such as Aylsham and Loddon.
- 3.57 In terms of the operation of the NPA in relation to measuring housing land supply we are pleased to note that paragraph 4.168 of the consultation document states that the retention of the NPA or a similar area for measuring 5-year land supply is considered to be unreasonable. This approach has previously effectively created two functional housing market areas in the plan area – the first a tightly drawn Norwich-centred band around the city with the latter a relatively unstructured rural hinterland. The difficulty is that the latter would fail to comply with the PPG definition of housing market areas, as set out at paragraph 011 Reference ID: 2a-011-20140306, as on its own it has no natural functional core.
- 3.58 Paragraph 2.56 of the original 2015 SHMA sets out why this position must now be moved on. It correctly identifies that the Government now requires a different methodology to be used to define housing market areas. There is a far greater emphasis on self-containment with HMAs expected to essentially comprise spheres of influence around a functional core. If an area does not have a certain degree of self-containment it cannot be considered to be a housing market area. Many of the areas surrounding Norwich do not have the necessary self-containment to be considered as housing market areas. Typically, a self-contained HMA will include a larger settlement which is a local centre for services. In Norfolk and Suffolk, Kings Lynn, Gt Yarmouth, Lowestoft, Ipswich and Bury St Edmunds are recognised as housing market areas. In comparison it cannot be considered that the rural hinterland of a highly influential urban area, affecting a significant influence on commuting patterns such as Norwich, is self-contained.
- 3.59 For too long the creation of two distinct but entirely artificial HMAs within an area governed by a single cohesive spatial strategy has improperly constrained sustainable growth serving Norwich in the rural areas of Broadland and South Norfolk. At the same time the delivery of homes within the NPA has

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faltered badly. As a result, neither Broadland or Norwich City Council have been able to deliver against their annual authority-wide housing requirement in any single year since the adoption of the Core Strategy in March 2011. South Norfolk have only met their deliver target once in this period – in the 2014/15 monitoring period It is entirely correct to now consider this approach as unreasonable. This will in turn ensure that both a combination of smaller and more deliverable rural sites is planned for alongside the larger, strategic allocations adjacent to the city to ensure that the needs of the Norwich HMA are met incrementally and in perpetuity. The abandonment of the Norwich Policy Area for monitoring purposes is a move that should have been made long before now.

Q37: Which approach to affordable housing thresholds do you prefer?

Q38: Which approach do you favour for affordable housing percentages?

***Summary of response:** We support the proposed inclusion of Option AH2 in relation to affordable housing thresholds in the GNL. We do, however, consider Option AH5 to represent a more pragmatic approach to the percentage of affordable housing to be delivered on specific sites.*

- 3.60 Firstly, in terms of thresholds, it is clear from the draft NPPF, published on 5th March 2018, that the Government's firm preferred approach in terms of identifying the scale of development from which affordable dwellings should be sought is on sites of 11 or more dwellings. Whilst it is acknowledged that the NPPF remains in draft form this approach carries through from the commitments first set out in the original Ministerial Statement of 28th November 2014 and later enshrined in the Planning Practice Guidance suite. It is evident that Option AH2, seeking a proportion of affordable housing on all sites of 11 or more dwellings (or 0.5ha or more), represents the most robust approach.
- 3.61 In setting affordable housing percentages, it is similarly evident from the text supporting each of the three options presented that the current preferred approach is that represented by Option AH3 – to seek 27% affordable housing on all sites above the qualifying threshold. We would, however, suggest that Option AH5 represents a more pragmatic approach that would allow larger sites (perhaps 100 units +) to deliver a greater range of enabling works up front in lieu of the early delivery of affordable housing. This would provide a greater allowance for vital infrastructure such as schools, roads, medical facilities to be delivered up front to ensure that any emerging community is truly sustainable from the outset.
- 3.62 Such an approach would also allow for the drafting of more bespoke site-specific policies that may allow the delivery of additional community facilities entirely in lieu of affordable housing in locations where a specific need exists. This form of trade-off would of course require the resultant global shortfall in affordable housing delivery to be met on additional sites elsewhere. Helpfully, this would be accommodated by the increased housing target described in our response to Q4, Q5 and Q6 of this consultation.

Q65: Which option do you support (in the event of a lapse in housing delivery)?

Summary of response: *We strongly support Option HLS2, the delivery of the most sustainable HELAA sites across the plan area, to ensure an immediate solution is available to help make up for any shortfall in delivery.*

- 3.63 Firstly, we would like to confirm that it is correct for the policy framework of the plan to take a proactive approach in terms of freeing up additional sites (that is those not specifically allocated in the eventual plan) to help meet any housing shortfall that may arise.
- 3.64 Two options are presented. The first makes use of the evidence base of the Plan with a presumption towards the delivery of the most sustainable unallocated HELAA sites in the event of a lapse in housing delivery. The second recommends a partial review of the GNLP with a view to allocating additional sites to meet the shortfall.
- 3.65 Deciding on the preferred option of the two should be a quick task. As the need to overcome any shortfall in housing delivery should always be considered as urgent a short term, flexible solution is required. This would not allow for the development of an entirely new section of the development plan, a process that would take at least two years. We would therefore strongly support Option HLS2, that is the delivery of a range of the most suitable HELAA sites to be reassessed against a strict list of criteria framed in the context of the spatial strategy of the eventual GNLP.

PART 2: Site Specific Representations

4.0 LAND AT NORTH EAST AYLSHAM

Overview

- 4.1 Set against our recommendations in relation to the strategic framework of the GNLP we are pleased to confirm that our Client's land at North East Aylsham (HELAA Site GNLP0336) remains available for consideration for a residential-led mixed-use development at the town.
- 4.2 Specifically, the site is made available for the following:
- A residential development of up to 300 dwellings, including a range of house types and tenure, including an appropriate proportion of affordable housing in line with emerging GNLP policy;
 - Provision of land to allow for the delivery of self-build or live/work units to further vary the range of tenure available (approximately 0.5ha);
 - Land appropriate for the delivery of a new primary school to serve the east of the town comprising two forms of entry (approximately 2.1ha). The location of this land adjacent to the Aylsham High School would allow for the creation of vibrant education hub;
 - Land to serve the needs of local community groups, labelled as a 'community zone' (approximately 0.5ha). Inclusion of this land follows specific discussions with the local Scouts group;
 - A linear country park comprising a wildlife and recreation area along the banks of the River Bure on the northern edge of the site including a protected wildlife habitat on the site's northernmost parcel. This would be complemented by an appropriate level of additional public open space throughout the site;
 - A master-planned development incorporating a range of residential character zones (rural, transition and central) providing a stepped approach to densities reflective of the relationship of each parcel with its surroundings;
 - Enhanced road linkages and an improved access solution on the east of the town. This centres around the provision of a new roundabout from the A140 and enhanced links to both the existing Bure Meadows residential development to the south of the site as well as to Aylsham High School and the new education hub;
 - Enhanced connections with the local footpath networks allowing for heightened pedestrian access to both the town centre and the Dunkirk Industrial Estate to the north;
 - A scheme of flooding and surface water drainage attenuation along the northern and eastern fringes of the site which would provide the additional benefits of increased landscaping around the site's fringes and an extension of the wildlife zone in the north allowing for a net gain in biodiversity.
- 4.3 A feasibility masterplan (Drawing Reference 16-042 SK03F) is provided in support of this submission demonstrating the way that development described above can be achieved on site.
- 4.4 The comments included in this representation follow the site's submission towards the Call for Sites exercise in July 2016. To this end they should be read in the context of our report prepared at that stage which deals with the more general aspects of the site including site description and land use, local character, planning history and site ownership. Instead, this submission seeks to provide a more detailed response to the main infrastructure constraints of the site (identified during the course of meetings with Broadland, the GNLP and Aylsham Town Council as waste water treatment and access) and provide greater clarity on both deliverability and how the proposed development can meet the broader needs of Aylsham.

4.5 To allow us to provide targeted solutions in this respect we have undertaken a significant programme of stakeholder engagement. The key bodies and groups with which we have consulted include (but are not limited to):

- Broadland District Council;
- The Greater Norwich Development Partnership (GNDP);
- Norfolk County Council Highways;
- Norfolk County Council Children's Services;
- Aylsham Town Council;
- Anglian Water;
- Aylsham High School; and
- 1st Aylsham Scout Group.

4.6 The range of discussions held with the stakeholders listed above provides an opportunity to promote a scheme that is not only right for the site but also directly meets the wider needs of Aylsham. Resultantly, this representation will conclude that, based on Aylsham's requirement to deliver significant growth in the Broadland's rural portion of the plan area, our client's land and proposed scheme represents an entirely sustainable form of development at the town. In addition, it offers a range of benefits that other sites in the town will be unable to deliver.

Summary of Main Stakeholder Engagement

Broadland District Council

4.7 A pre-application enquiry was submitted to Broadland District Council on 18th October 2017 that secured an opportunity to discuss the potential future delivery of the site with Officers representing both the Council's development management and policy functions. A formal meeting was held on 17th January 2018 at the Council's offices which was also attended by a representative of Norfolk County Council Highways.

4.8 At the meeting a number of points were agreed with regards to the delivery of the site:

- Housing allocations are anticipated at Aylsham – it is the view of NCC that the optimum scale of allocation for the town would be sites of approximately 250-300 dwellings to allow the delivery of sufficient highways infrastructure benefits;
- NCC would be supportive of the delivery of a roundabout accessing the site from the A140. This allied with the additional southern access to Bure Meadows would provide an infrastructure benefit to the east of the town;
- NCC Children's Services consider that the provision of a new primary school site at the town would provide a key benefit towards meeting both existing and future education needs;
- Theoretically, it is understood that waste water treatment capacity either currently exists or can be created at Aylsham. This would need to be confirmed with Anglian Water, however; and
- It is recognised that the site is of a scale to provide a range of benefits to the town, not least housing provision, and that these should be emphasised as part of any future promotion.

4.9 An agreed minute of this meeting is included as part of this submission.

GNDP

- 4.10 A meeting was held with Officers of the GNDP on 13th February 2018 that sought to build on the Broadland-specific comments secured at the meeting of the 17th January 2018. The meeting with the GNDP focused on the way in which the site can benefit the GNL P's overall strategic approach towards growth and the way in which any future promotion can strengthen the case for the site's allocation.
- 4.11 At the meeting a number of points were agreed on this basis:
- It was reiterated that Aylsham will be expected to deliver a level of growth as the only Main Town in Broadland and in the north of the plan area;
 - Regardless, a clear case should be made within any representation as to why housing allocations at Aylsham would be required and how the site could best meet this need;
 - Site delivery is an important factor – can the land deliver what it promises? Also, on what basis and for what purpose can the various community benefits be secured?
 - In terms of access it is important that any highways improvements are justified in a strategic context – would the proposed scheme of access be capable of providing wider sustainability benefits to the town? Also, are any alternative forms of access capable of being delivered at the site?
 - Waste water treatment capacity is identified as a potential critical constraint in the Growth Options document – this would have to be addressed as part of any submission;
 - Additional more minor constraints are identified in the HELAA – these should be addressed as part of any submission; and
 - Echoing the sentiments expressed during the Broadland meeting a new school site would be considered beneficial.
- 4.12 An agreed minute of this meeting is included as part of this submission.

Aylsham Town Council

- 4.13 A meeting was also held with the Town Council on 13th February 2018. This presented an opportunity to identify the ways in which the delivery of the site may best meet the needs of the town. Whilst it was acknowledged that the emerging Aylsham Neighbourhood Plan will not seek to allocate sites for development it does provide a list of broader design requirements that should be referred to.
- 4.14 A number of key issues were identified by representatives of the Council that are capable of being accommodated as part of the site's delivery:
- A design and layout in line with the draft policies of the emerging Aylsham Neighbourhood Plan would be welcomed. This could be secured through a requirement for design codes to be agreed as part of any future application;
 - Enhanced linkages with the town centre and existing uses in the town should be provided wherever possible;
 - The strengthened links to the Dunkirk Industrial Estate that can be provided by the site are appreciated;
 - The provision of the country park adjacent to the River Bure would likely carry support within the town as it would provide an important open space resource and strengthen the level of access afforded to the surrounding countryside;
 - The provision of additional community space, including potential facilities for the local Scout Group, would be welcomed; and

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- The provision of a range of house types and tenure, including opportunities for self-build units, would be of notable benefit to the town.

4.15 A copy of the minute of this meeting is included as part of this submission. Please note that this minute has been issued to the Town Council but is yet to be agreed.

Response to Stakeholder Feedback

4.16 Following the highly informative round of stakeholder engagement set out above a significant level of additional work has been undertaken to ensure that all key points raised during the course of discussions have been actioned. Our response, on a topic by topic basis, is set out below.

Access

4.17 Following comments received from Norfolk County Council Highways during the course of both the Broadland and GNDP stakeholder meetings a thorough assessment of the access options available at the site, along with local movement patterns, has been undertaken. This demonstrates that both sufficient access can be provided to the site and that the proposed access arrangements can in fact provide notable benefits to movement at the east of the town.

4.18 A Transport Feasibility Appraisal (TFA) has been included with this submission which sets out the potential highways and transportation implications associated with constructing a residential led mixed use scheme on the Land North East of Aylsham site. In summary, this TFA shows:

- The site is well located to encourage people to travel by modes of transport other than the private car;
- Safe and suitable access for all can be delivered from the A140 and an existing residential area located to the south (i.e. Bure Meadows);
- The delivery of the site will allow for enhanced vehicular access to both Aylsham High School and the pumping station to the north west; and
- The potential impact of the development proposals considered to date are unlikely to lead to any demonstrable harm to the local highway network, let alone the severe impact referred to in the NPPF as being the only legitimate reason to resist a proposed development on highways and transportation grounds.

4.19 Indeed, it should be noted that the Land North East of Aylsham site benefits from ease of access to a comprehensive range of local amenities that can be accessed by a range of modes of transport. This access to local transport services can be enhanced through the provision of an additional spur of the local bus route through the site. In this regard, it is worthy to note that 2011 Census results indicate that there is a higher propensity for existing residents of North East Aylsham to walk and cycle to work than those located to the south and west.

4.20 This is an important distinction in the context of the emerging GNLP, especially given the pedestrian and cycle infrastructure in the immediate vicinity of the site have been enhanced in recent years by the adjacent Bure Meadows development. As our client's site is able to make direct connections to Bure Meadows, it is evident that future residents will be able to take advantage of these links.

4.21 However, it should be noted that the Land North of Aylsham site will also provide reciprocal benefits to Bure Meadows and the existing community more widely. For example:

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- The provision of a primary school on the site will reduce the need for residents of Bure Meadows to travel across Aylsham to the existing education establishments, thereby reducing car based education trips;
- The introduction of a new vehicular access on the A140 will enable a redistribution of traffic associated with Aylsham High School and residents of Bure Meadows, which will reduce the number of vehicles that use Burgh Road and Sir William's Lane;
- The inclusion of an alternative vehicular access to the Mill Road Water Treatment Works will overcome disruption that is often associated with larger vehicles trying to access this facility via Mill Row; and
- The emerging vehicular access strategy has the potential to improve Bure Meadows resident's accessibility to buses through the diversion of Route 43 within the Land North East of Aylsham site.

4.22 The site is also capable of plugging in to the existing footpath and cycle network allowing high levels of access to both the town centre and the full range of local shops and services. Indeed, the Sustainability Plan provided in support of this representation (included at Appendix C of the TFA) shows that, on balance, our client's land is best placed to allow ease of access to not only the town centre but both the notable supply of employment opportunities at Dunkirk Industrial Estate and the open countryside to the east of the town via the new country park along the River Bure.

4.23 On the basis of the above there is clear justification and legitimate transport sustainability reasons why the Land North East of Aylsham should be included in the emerging Greater Norwich Local Plan as an allocated housing site. The proposed access solution will allow for enhanced traffic and pedestrian flows around the east of the town and from the A140 to a range of local traffic generating uses such as the Bure Meadows scheme and Aylsham High School.

Waste Water Treatment

4.24 A report is included in support of this submission setting out the findings of Create Consulting, that waste water treatment capacity should not prove a constraint to the allocation of new homes at the town including the suggested allocation of an approximate 750 homes at Aylsham. Create's report is aided by ongoing dialogue with Anglian Water that first began in 2012 when investigating the delivery of the Bure Meadows development on the east of the town.

4.25 In summary it is concluded that sufficient capacity exists at the Aylsham Waste Water Treatment Works (WWTW) to accommodate flows produced by whatever level of growth is allocated to the town. Physical capacity exists at the northern end of the WWTW site to deliver additional treatment facilities with proposals for the upgrade of the works anticipated for inclusion in Anglian Water's next Asset Management Plan (AMP) covering the period from 2020 onwards. Even if not included in the AMP this upgrade would likely be prioritised depending on the decisions made within the GNLP with agreed capital expenditure able to be diverted to cover more urgent project work. To this end the upgrade of the WWTW could be secured within the first five years of the plan period if early delivery of housing in and around Aylsham is considered a priority.

4.26 Even in the event that potential delays occur to the upgrade of the WWTW it is possible that that on-site solutions could accompany the delivery of any major residential proposals at the town. A smaller standalone treatment works could easily be provided at the northern end of our client's site which deals with site-specific flows and supplements the local network of waste water treatment if required.

Education Contributions

- 4.27 The provision of a site for a new primary school as part of the overall development carries the universal support of all key stakeholders, including Norfolk County Council’s Children’s Services, and is recognised as representing a significant benefit to the town. Our client’s site is the only site in Aylsham of a scale capable of physically delivering much needed schools infrastructure alongside the level of housing required to both justify the delivery of the site and ensure that the overall development remains viable.
- 4.28 The unique location of our client’s land – immediately adjacent to Aylsham High School – presents the only prospect within the town to provide a multi-tiered education hub at Aylsham. The future delivery of a new primary school would allow for the provision of all levels of education at a single central location. It would also allow pupils to share the open space facilities to be provided as part of the expanded Aylsham High School site. We have held initial discussions with the Director of Business and Community Strategy at the High School who similarly identifies this as a notable opportunity at the town.
- 4.29 The enhanced scheme of vehicular and pedestrian access offered to both the current Aylsham High School and future primary school is set out in the accompanying Access Strategy, summarised above. This includes a potential link road across the school expansion land, the principle of which will be discussed further with the school in the event that the site is allocated within the GNLP.
- 4.30 In terms of delivery the proposed primary school site is entirely capable of being identified as part of a comprehensive allocation at the north east of the town and secured for the delivery as part of a future Section 106 Legal Agreement. The provision of the physical school building would then be funded in accordance with Broadland’s adopted Community Infrastructure Levy (CIL) as described in the table below.

CIL Regulation 122 Test	Response
<p>Necessary to make the development acceptable in planning terms</p>	<p>It is understood that school capacity in Aylsham is currently sufficient to sustain the existing population and recent residential growth. However, expansion of education facilities in the town, at primary level in particular, will be required to accommodate future housing delivery.</p> <p>The following comments were provided by the Children’s Services department at Norfolk County Council during the course of stakeholder engagement when preparing this submission:</p> <p><i>“The offer of a new school site for Aylsham is actually quite favourable for us. As I expect you know, we have a smaller St Michaels Primary School on one site and John of Gaunt and Bure Valley on adjacent sites. We are managing pupil numbers at the moment but St Michaels is a small school on a site that can’t be expanded so ideally a new school site would give us more opportunities to cater for future housing in Aylsham.”</i></p> <p>It is evident that new local education facilities will be required during the course of the plan period in the event that somewhere between 750 to 1,000 homes are</p>

	<p>appropriately allocated to Aylsham. Even in the event that the town receives a lower allocation, land for the delivery of new school must be secured as part of the emerging plan strategy to sustain the inevitable incremental growth of the town for the period until 2036.</p> <p>The level of growth anticipated in the town would likely exhaust any existing opportunities for school expansion at existing facilities – if the recommended allocation of between 750 to 1,000 homes is directed towards the town this would necessitate an entirely new primary school comprising two new Forms of Entry.</p> <p>To this end it is evident that the type of strategic approach to the delivery of primary school facilities in Aylsham will be necessary to make any future growth, including the notable levels of growth proposed on our Client’s land, acceptable in planning terms.</p>
<p>Directly related to the development</p>	<p>The development represents a residential-led mixed use scheme on the eastern side of Aylsham. It proposes an increase of between 250 to 300 homes that would generated a significant need for new school places in the town.</p>
<p>Fairly and reasonably related in scale and kind to the development.</p>	<p>It is established that development of the scale proposed on our Client’s site would likely trigger the need for additional primary school accommodation within Aylsham. Taken cumulatively, the level of growth likely to be proposed in the town would outstrip the level of additional accommodation that can be achieved through the expansion of current school facilities and would generate a need for a new primary school premises in Aylsham.</p> <p>It should firstly be recognised that for new school facilities to be delivered in Aylsham the direct transfer of land will need to be secured as part of any Section 106 Agreement. There is no single site in the town that would deliver a level of housing of a scale to justify the need for a new primary school on its own. However, cumulatively the level of development likely in the town would require the delivery of an entirely new school facility. At a strategic level the GNDP will have to identify land to meet not only the housing needs of the town but ways in which to deliver the necessary associated community infrastructure.</p> <p>Our Client’s site is the only location in Aylsham with the physical capacity to deliver both land for a primary school facility and a significant number of new dwellings.</p> <p>Broadland’s current Regulation 123 list produced in support of their CIL identifies that the physical expansion of the existing range of facilities in the town would be covered by monies raised by the Levy. In terms of securing additional school land this should be secured by</p>

	<p>way of transfer set out in a Section 106 Agreement. Both could be secured as part of any planning application on the site without risk of double counting.</p> <p>The possibility would exist to off-set the value of the contribution proposed as part of our Client's site – the transfer of approximately of a 2.1ha parcel valued as amenity land – from the full scale of contributions set out in any S106. As the level of contribution towards education may be proportionately higher than would otherwise be expected from a 250 to 300 dwelling scheme it is essential that any policy wording allocating the site includes some flexibility in its wording to ensure that the delivery of infrastructure is based on a site-specific assessment of viability. This would ensure that the planning gain secured as a result of the development is proportionate in both scale and kind.</p>
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Provision of Community Space

- 4.31 At the meeting with Aylsham Town Council it was confirmed that there is a need for additional community space within the town. Specifically, there is a known need for improved facilities for the popular and expanding 1st Aylsham Scout Group. It is understood that the group are one of a number of local clubs and societies that use the town's Drill Hall, on Cawston Road. They are, however, now seeking premises of their own along with usable outdoor space.
- 4.32 Discussions have been ongoing in parallel with the Scout Group who confirmed their precise requirements to our client in a letter dated 28th January 2018, stating that there is a need for a private space that is capable of accommodating a meeting hut as well as outdoor camping and recreational facilities. Accordingly, the proposal includes a 0.5ha community zone that could be made available to the Scout Group in future. On this basis we are pleased to have secured the support of the Group, discussions with whom will continue in the event that our client's land is allocated in the GNL P.
- 4.33 A copy of the most recent correspondence from the Group, dated 12th March 2018, is enclosed with this submission confirming the suitability of our client's land to meet their needs and their firm support for our client's proposals.

Response to the HELAA

- 4.34 At the meeting with the GNDP it was recommended that any site-specific issues identified in the HELAA are adequately covered as part of any future submission. A number of site constraints are identified as amber in the review of our client's land (site reference GNL P0336) included in the December 2017 site assessment. These are addressed in the table below.

Constraint or impact	Response
Access Transport and Roads	It is demonstrated within the access strategy included with this submission that highways improvements can be provided that result in a net improvement to the efficiency of the local road network.
Utilities Capacity Utilities Infrastructure	The Infrastructure Strategy submitted alongside the response to the Call for Sites in July 2016

	<p>demonstrates that connections are available to all local utilities and that capacity exists in the various networks.</p> <p>Whilst it is noted that upgrades will be required to local waste water infrastructure these will be secured as part of Anglian Water's future Assets Management Plan.</p> <p>Anglian Water and UKPN have existing apparatus crossing the site. Any future development on the land would ensure that wayleaves are provided to allow unfettered future access if required.</p>
Flood Risk	<p>A sufficient scheme of flooding and surface water mitigation can be included on site to cater for any future risk. This would primarily be delivered as a series of channels, swales and attenuation ponds along the northern and eastern boundaries of the site. This would allow discharge to the River Bure and the local network of ditches at Greenfield rates.</p>
Townscape	<p>Any development on the site would be delivered against sound and sensitive design principles ensuring that its delivery forms a natural extension to the town.</p> <p>Any future site-specific policy could include the need for agreed design codes in line with the policies of the emerging Neighbourhood Plan. In addition, it is proposed to vary the scale and density across the site to ensure that any eventual development respects its rural edge.</p>
Biodiversity and Geodiversity	<p>The proposed developable area of the site would entirely comprise the extent of the agricultural field to the immediate north of the existing Bure Meadows scheme. Otherwise, the land along the corridor of the River Bure, as well as the eastern fringe of the site, would benefit from significant levels of habitat enhancement resulting in a notable net gain in local biodiversity.</p>
Historic Environment	<p>It is not entirely clear why impact on heritage is identified as a constraint. The site is not within a Conservation Area and there are no listed buildings in close proximity.</p>
Compatibility with Neighbouring Uses	<p>Far from proving a constraint, the site is entirely compatible with neighbouring uses.</p> <p>The provision of the new school site will help create an enlarged education hub centred around Aylsham High School.</p> <p>The provision of enhanced footpath links will allow for heightened access from Bure Meadows to the supply</p>

	<p>of employment at the Dunkirk Industrial Estate to the north.</p> <p>The delivery of a linear river walk as part of the country park at the northern end of the site will help provide seamless linkages between the site and the open countryside to the east.</p>
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4.35 It is clear that the HELAA review is based on the assessment of a simple 'policy off' scenario – that is a review of the site and its constraints without any appreciation of the mitigation and complementary uses proposed as part of the overall development. It is clear from the range of technical information include with this current submission that many, if not all, of the 'amber' comments should be included as 'green' in any future iteration of the HELAA.

5.0 CONCLUDING REMARKS

- 5.1 This Statement provides a full and detailed response to the GNLP Growth Options consultation on behalf of our client Westmere Homes. Following a review of the consultation document we are pleased to make a number of recommendations in relation to the level of growth to be delivered within the plan as well as the most appropriate spatial strategy to be employed across the three districts of Broadland, Norwich and South Norfolk.
- 5.2 The main conclusions that should be drawn from the response of Westmere Homes in respect of the emerging GNLP strategy are as follows:
- There is a pressing need for the emerging plan strategy to be more aspirational in its approach towards combined jobs and housing growth.
 - There is a need to ensure that the full 13,000 jobs and 8,361 homes required as a result of the City Deal are planned for and delivered in full to ensure that the economic potential of Greater Norwich is realised;
 - As a result of the necessary recasting of the plan's strategy reflective of planned jobs growth a revised residual need can be identified for 11,700 additional homes over the plan period to be delivered by way of allocations;
 - Whilst it is considered realistic that the majority of the plan's strategic allocations in and around the Norwich Fringe may be delivered prior to 2036 it is evident that the majority of this delivery will take place in the second half of the plan period;
 - Due to a combination of increased housing need and delays in the delivery of the larger strategic sites there is a more pressing need to identify a range of smaller sites (50 to 300 dwellings) across the plan area that will allow a consistent level of delivery from the early years of the plan period onwards;
 - In addition, greater emphasis should be placed on the more sustainable rural settlements of the plan area (the Main Towns and larger villages) due to their close relationship with the Norwich Economic Area. Such a step is vital to ensure that greater pressure on affordability in the attractive rural housing market is avoided once the pipeline of highly skilled jobs promised by the City Deal begins to flow; and
 - On this basis the Main Towns across the plan area should be required to deliver a minimum of 550 homes each over the plan period. Due to its strategic importance, as the only Main Town in the rural north of the plan area, Aylsham should be required to deliver at least 750 homes over the plan period.
- 5.3 Moving on from the analysis set out above our client's site, Land at North East Aylsham, represents an immediately available, deliverable and entirely sustainable location to deliver up to 300 dwellings along with supporting community uses, open space and improved access at the town.
- 5.4 This representation supplements the information submitted towards the 2016 Call for Sites exercises and demonstrates how all environmental and infrastructure constraints can be overcome on the site. Furthermore, and aided by an extensive scheme of engagement with all key local stakeholders, it is now clear that the land is capable of delivering a level and form of development that directly meets the needs of Aylsham.
- 5.5 **It is clear that the site represents the only opportunity of sufficient scale at the town that can viably deliver both a significant contribution towards the housing needs of Aylsham alongside necessary key community infrastructure such as the proposed new primary school site.**