

**Land at Burgh Road, Aylsham**

**GNLP Consultation Questions – Suggested Responses**

<b>Section 1 - Introduction</b>		
1	Please comment on or highlight any inaccuracies within the introduction	No response suggested
2	Is the overall purpose of this draft plan clear?	No response suggested
<b>Section 2 – Greater Norwich Spatial Profile</b>		
3	Please comment on or highlight any inaccuracies within the spatial profile	No response suggested
4	Are there any topics which have not been covered that you believe should have been?	No response suggested
5	Is there anything that you feel needs further explanation, clarification or reference?	No response suggested

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

6	Do you support or object to the vision and objectives for Greater Norwich?	Support, with comments:  The objective of delivering high quality homes that contribute to the delivery of mixed, inclusive, resilient and sustainable communities that are supported by appropriate economic and social infrastructure is fully supported. The approach is fully consistent with the National Planning Policy Framework.
7	Are there any factors which have not been covered that you believe should have been?	No response suggested
8	Is there anything that you feel needs further explanation, clarification or reference?	No response suggested

**Section 4 – The Delivery of Growth and Addressing Climate Change**

9	Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?	Support, with comments  The requirement that sites should only be allocated for housing where, having regard to policy requirements, there is a reasonable prospect that housing can be delivered, fully accords with paragraph 67 of the NPPF.  Whilst the submission of Delivery Plans as part of a planning application is supported the documents need to recognise that there may be unforeseen material changes in circumstances, which could impact the delivery of an allocation.  The identified buffer in relation to housing numbers will help maintain the supply and delivery of housing, in accordance with the NPPF and specifically the Government's objective of encouraging authorities to
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		<p>consider more growth than required to meet local housing need, particularly in locations where there is potential for significant economic growth, such as the Cambridge Norwich Tech Corridor.</p> <p>However, to guard against non-delivery, particularly in relation to the potential failure of larger strategic sites in the Norwich urban area to come forward, a minimum buffer of 10% should be identified. Indeed, the draft GNLP states on page 45 that the Regulation 19 version of the Plan will aim to provide a minimum buffer of 10% (at least 250 further homes).</p>
10	Do you support, object, or have any comments relating to the approach to Economic Development set out in the Delivery Statement?	No response suggested
11	Do you support, object, or have any comments relating to the approach to Infrastructure set out in the Delivery Statement?	<p>Support, with comments:</p> <p>Whilst there is support, in principle, for the proposed approach to infrastructure, particularly the need for key stakeholders to work collaboratively, the Delivery Statement should make it clear that infrastructure requirements will be proportionate to each development and based on clear assessments of need. Failure to do this will result in certain developments being rendered unviable and, therefore, undeliverable.</p>
12	Do you support, object, or have any comments relating to the Climate Change Statement?	<p>Support, with comments</p> <p>The strategic policy is considered to provide a framework to ensure communities developed and infrastructure delivered under the plan will be resilient to the impacts of climate change.</p>
<b>Policy 1 – The Sustainable Growth Strategy</b>		
13	Do you agree with the proposed Settlement Hierarchy and the proposed	Support, with comments:

	distribution of housing within the hierarchy?	The proposed Settlement Hierarchy is strongly supported; it is recognised that The Norwich Urban Area and Main Towns, such as Aylsham, provide a range of services and amenities and are, therefore, the most sustainable and suitable locations for the majority of growth within the Greater Norwich Urban Area.
14	Do you support, object, or wish to comment on the approach for housing numbers and delivery?	Support, with comments:  For reasons outlined in relation to Question 13, we support the identification of 300 new allocations in Broadland's Main Town to accommodate additional growth.
15	Do you support, object, or wish to comment on the approach for the Economy?	No response suggested
16	Do you support, object, or wish to comment on the approach to Review and Five-Year Land Supply?	Support, with comments:  The proposed review of the Plan 5 years after Adoption is fully consistent with paragraph 33 of the NPPF. However, it should be made clear in the Policy that the review will need to be <u>completed</u> within 5 years of adoption.
17	Do you support, object, or wish to comment on the approach to Infrastructure?	Support, with comments:  The need to support sustainable growth through the provision of infrastructure improvements, such as schools and health centres, is, in principle, supported. However, the policy should recognise that infrastructure provision must be proportionate to each development, to mitigate the impacts of the specific development, based on a local need and must not undermine delivery.
<b>Policy 2 – Sustainable Communities</b>		
18	Do you support, object or have any comments relating to the preferred approach to sustainable communities	Support, with comments:  The principle of ensuring that developments are high quality and contribute to delivering inclusive growth in mixed, resilient and sustainable communities, whilst assisting in mitigating and adapting to climate

	including the requirement for a sustainability statement?	change is supported. To demonstrate the ability to secure these objectives, the preparation of a Sustainability Statement as part of an application for a major development is supported.  Whilst the requirement to ensure the efficient use of land by, amongst other things, providing an indicative minimum density of 25 dwellings per hectare, is supported, the policy, or supporting text, should make it clear that, as well as giving consideration to on site characteristics, consideration will be given to a range of other site / scheme specific issues, such as housing mix, design considerations and the densities of the surrounding area.
19	Do you support, object or have any comments relating to the specific requirements of the policy?	Support, with comments:  Whilst the requirement to ensure the efficient use of land by, amongst other things, providing an indicative minimum density of 25 dwellings per hectare, is supported, the policy, or supporting text should make it clear that, as well as giving consideration to on site characteristics, consideration will be given to a range of other site / scheme specific issues, such as housing mix and design considerations.
<b>Policy 3 – Environmental Protection and Enhancement</b>		
20	Do you support, object or have any comments relating to the approach to the built and historic environment?	Support. No additional comments suggested.
21	Do you support, object or have any comments relating to the approach to the natural environment?	Support. No additional comments suggested.
22	Are there any topics which have not been covered that you believe should have been?	No response suggested
<b>Policy 4 – Strategic Infrastructure</b>		

23	Do you support, object or have any comments relating to approach to transport?	No response suggested
24	Do you support, object or have any comments relating to the approach to other strategic site infrastructure (energy, water, health care, schools and green infrastructure)?	<p>Comments:</p> <p>The proposal for continued lobbying of statutory providers for the timely delivery of improvements to strategic infrastructure, such as the energy supply network, is welcomed and supported. This will be critical to ensuring the timely delivery of the planned growth.</p> <p>It is supported that Anglian Water have plans to increase capacity at the local water recycling centre.</p>
25	Do you support, object or have any comments relating to the approach to on-site and local infrastructure, services and facilities?	<p>Support, with comments</p> <p>The need to support sustainable growth through the provision of on-site and local infrastructure improvements is, in principle, supported. However, the policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery.</p>
26	Are there any topics which have not been covered that you believe should have been?	No response suggested
<b>Policy 5 - Homes</b>		
27	Do you support, object or have any comments relating to approach to affordable housing?	<p>Comments:</p> <p>Support principle, but notwithstanding Government guidance regarding the need for allocations to demonstrate there is a realistic prospect of being delivered, the policy should, as per the existing policy within the Joint Core Strategy, recognise that there may be a material change in circumstance, that may warrant the submission of a viability assessment.</p>

28	Do you support, object or have any comments relating to the approach to space standards?	<p>Comments:</p> <p>In accordance with PPG requirements, space standards should only be introduced where there is robust evidence to demonstrate that they are required. The evidence referenced within the draft Plan indicates that, in fact, 75% of homes in Greater Norwich were delivered to the necessary standards between 2016-2018, which calls into question the need for a policy requiring strict adherence.</p> <p>Notwithstanding the above, the policy should include flexibility in its wording to allow delivery of homes that are below the space standards, where they are well-designed and meet specific needs.</p>
29	Do you support, object or have any comments relating to the approach to accessible and specialist housing?	No response suggested
30	Do you support, object or have any comments relating to the approach to Gypsies and Travellers, Travelling Show People and Residential Caravans?	No response suggested
31	Do you support, object or have any comments relating to the approach to Purpose-Built Student Accommodation?	No response suggested
32	Do you support, object or have any comments relating to the approach to Self/Custom Build?	<p>Object</p> <p>The proposal to require all developments of 40+ dwellings to provide 5% of plots as serviced self/custom build plots is considered inappropriate and unjustified. The supporting text indicates that at present there are 113 people on the Self Build Register in the Greater Norwich Area. The proposed policy will result in a level of supply which significantly exceeds the demand. Furthermore, particularly for the larger sites, it will have a significant impact on continuity in delivery, which is critical for both the developers and for the Councils in ensuring they are able to maintain a 5-year land supply.</p>

		<p>In addition, it may make it difficult to achieve a well-integrated development from a design perspective.</p> <p>Self/Custom Build plots should be secured on a site-by-site basis, dependent on local need at the time of the development, or alternatively an exception site approach could be taken to stimulate supply.</p>
33	Are there any topics which have not been covered that you believe should have been?	No response suggested
<b>Policy 6 – The Economy</b>		
34	Do you support, object or have any comments relating to the approach to employment land?	No response suggested
35	Do you support, object or have any comments relating to the approach to tourism, leisure, environmental and cultural industries?	No response suggested
36	Do you support, object or have any comments relating to the sequential approach to development of new retailing, leisure, offices and other main town centre uses?	No response suggested
37	Are there any topics which have not been covered that you believe should have been?	No response suggested



**Policy 7.1 – The Norwich Urban Area including the fringe parishes**

38	Do you support or object or wish to comment on the approach for the City Centre? Please identify issues.	No response suggested
39	Do you support or object or wish to comment on the approach for East Norwich? Please identify issues.	No response suggested
40	Do you support or object or wish to comment on the approach for elsewhere in the Urban Area including the fringe parishes? Please identify issues.	No response suggested

**Policy 7.2 – The Main Towns**

41	Do you support or object or wish to comment on the approach for the main towns overall?	<p>Support, with comments:</p> <p>As detailed in comments provided in respect of Question 13, the proposed Settlement Hierarchy and the identification of the Main Towns to accommodate approximately 14% of housing growth during the period to 2038 is supported.</p> <p>As detailed in the draft Local Plan, the Main Towns, such as Aylsham, provide a range of services and amenities and are, therefore, the most sustainable and suitable locations for the majority of growth. Development in these locations is key to ensuring the sustainability of the rural economy.</p> <p>More specifically, Aylsham is recognised in the draft Local Plan as a sustainable location, with a good range of shops and services, as well as local employment opportunities. It also benefits from good public transport links to Norwich and beyond. Consequently, it is a suitable location for additional growth, in accordance with the settlement hierarchy.</p>
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42	Do you support or object or wish to comment on the approach for specific towns?	Support, with comments:  We strongly support the proposed allocation of at least 300 dwellings within Aylsham. As detailed in our response to Question 41, as one of five Main Towns in the settlement hierarchy, Aylsham is a suitable and sustainable location for growth. Allocating this quantum of development to the town will assist in ensuring its continued vitality and viability as a Market Town, serving a wide rural hinterland.
<b>Policy 7.3 – The Key Service Centres</b>		
43	Do you support or object or wish to comment on the approach for the key service centres overall?	No response suggested
44	Do you support or object or wish to comment on the approach for specific key service centres?	No response suggested
<b>Policy 7.4 – Village Clusters</b>		
45	Do you support or object or wish to comment on the overall approach for village clusters?	No response suggested
46	Do you support or object or wish to comment on the approach for specific village clusters?	No response suggested
<b>Policy 7.5 – Small Scale Windfall Housing Development</b>		
47	Do you support or object or wish to comment on the overall approach for	No response suggested

	Small Scale Windfall Housing Development?	
<b>Overarching Consultation Question</b>		
48	Do you support or object or wish to comment on any other aspect of the draft plan not covered in other questions? This includes the appendices below and the evidence base on the web site. Please identify issues.	<p>Comments:</p> <p>The following comments relate to the Greater Norwich Local Plan, Interim Viability Study, prepared by NPS Group (November, 19).</p> <p>Whilst there is general support for the approach adopted and the collaborative approach that the GNLP Team are seeking to adopt, there is concern that the assumptions made within the Viability Study in relation to, amongst other things, sales values, build costs and benchmark land values are too generic and not backed up by comparable evidence. A few specific comments are provided below:</p> <ul style="list-style-type: none"> <li>• The assumed land values are too low and not representative of market values. Comparable evidence needs to be provided to justify the figures used.</li> <li>• Garages should be added into the build cost calculation.</li> <li>• No allowance has been made for Abnormals. This should be included or, alternatively, the contingency should be increased accordingly.</li> <li>• No allowance is made for planning or promotion costs.</li> <li>• An allowance should be made for Services. These are becoming increasingly expensive particularly given the increased requirements anticipated through the Future Homes Standards Consultation.</li> <li>• There is a concern that the £5,000 allowance for energy efficiency measures is too low.</li> <li>• The affordable rent values are included at 60% of Open Market Values. Based on recent evidence we would suggest that this figure should be between 45%/50% of open market value.</li> </ul>

		<ul style="list-style-type: none"><li>• The intermediate units (Affordable Homes Ownership) are included at 75% of OMV. Based on recent evidence we would suggest that assuming a shared ownership model, the figure should be between 65% of open market value.</li></ul>
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