**Response to GNLP Regulation 19**

Steve Riley Aylsham resident and District Councillor for the Aylsham ward .

**Is the plan legally compliant?**

To ensure legal compliance the following must be adhered to:

* The process of community involvement for the plan should be in general accordance with the **LPA’s Statement of Community Involvement** [**SCI**]. No Aylsham virtual engagement have been used to “to engage with community and stakeholder bodies.
* **1.6 Paragraph 155 of the National Planning Policy Framework** (2012), states: 'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged.

 The Town Council and residents were not approached and there is no evidence that "a wide section of the community has been proactively engaged".

* **Section 33A of the Planning and Compulsory Purchase Act 2004** [F133 Duty to co-operate] requires Broadland to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan.
The LPA will be expected to provide evidence of how they have complied with the duty.

In regards to Buxton parish council, Burg and Tuttington, Aylsham T C , Broadland has not engaged constructively, nor with North Norfolk District Council.

I ask that Broadland provide evidence of how they have complied with this duty.

From the above for Regulation 19 to be legally compliant there must be evidence of consultation. Below are the key points on this issue.

* Aylsham Town Council and residents of the town and the District Councillors were consulted on Regulation 18 which ony included one site off 300 houses. The second site of 255 house was not consulted on and infrastructure considered or examined for the additional site. The additional site has been added to in reg 19 without the appropriate consultation. With consultation it may have been viewed that the second site was not viable re infrastructure or phasing would be appropriate and considered for the second site to allow infrastructure to be built re capacity to support and the need of an additional school built and then staffed by county in a timely manner.
* There has been no consultation with Aylsham Town Council or the residents on the changes regarding the content of the sites section of Regulation 19. There are two sites in Regulation 19 total 550 homes, an increase of 83% on the homes consulted upon in Regulation 18.Infrastructure could not be consulted upon and therefore examined to see if this could support a second site.
* There was no consultation on Regulation 19 with Aylsham Town Council or residents in regard to the infrastructure as it was assumed by the GNLP board that Regulation 18 consultation was sufficient, despite the significant changes in the two plans.
* The GNLP suggested that the feedback for Reg 18 gave ‘confidence to the deliverability of new residential development in Aylsham’. The only supportive responses came from the developers. Therefore, the understanding of the response is inadequate and therefore both not legally compliant and unsound.

**Is Regulation 19 Sound?**

**Is Regulation 19 positively prepared**?

* There are inaccuracies within the information provided on Aylsham, such as the day of the main market and the cycle route to Norwich. This brings into question how well the GNLP understand Aylsham and why consultation is important, however the second site was not included in reg 18, so has not been consulted upon.
* Previous documents produced by Broadland District Council, the GNLP and Anglian Water highlight the problems of water supply and sewage disposal in respect of Aylsham. The requirement of an upgrade by Anglian Water is made but this does not come with guarantees or timescales. This issue was highlighted as a severe problem with the recent developments and with the one site put forward in Reg 18 this was considered a major issue. Burg and Tuttington are not consulted on second site and sewage issues are still a problem following resent new build in Aylsham.
* By putting forward two sites the quality and speed of broadband will be severely tested and there will be a strong chance that the Central Government Target will not be met.
* Reg 19 describes the uniqueness of the town highlighting its history and the importance of retaining this. This has been a severe problem with the recent developments of 550 new homes at Willow Park and Bure Meadows, to add a further 300 as in Reg 18 would strain this considerably. However, to increase the number of new homes by a further 83% on the edge of the town indicates that Reg 19 could not have been positively prepared as the evidence points to significant damage to the uniqueness of the medieval town. Parking is limited in the town centre for access to shops by the very nature of the old town layout and cannot support unless improved additional parking is planned for in some way. The second site was not consulted upon in reg 18 and therefore this could not be taken into account.
* Reg 19 states that it has considered the impact of Covid. However, there is a lack of analytical analysis to show how that will impact on Aylsham’s way of life and economy post pandemic. In Reg 18, Aylsham was allocated one site. Then, in the middle of the Covid crisis, the town was allocated two sites without consultation, or consideration that more brownfield sites may become available when the crisis is over. This indicates that Reg 19 has not been positively prepared and opportunities to look beyond the large-scale developments on the edge of towns and cities have been lost.
* There is a similar lack of thought in Reg 19 concerning Brexit, which will have a significant impact on the greater Norwich area. To commit, without consultation, two sites for a small market town such as Aylsham, when the country will be in a significant period of economic flux demonstrates a lack of preparation and thought.

**Is Regulation 19 Justified?**

* As stated under legal compliance, the residents of the town were consulted on the need for ONE site. There were concerns with Reg 18, particularly in respect of the demands it would make on the infrastructure of the town. However, to have two sites as in Reg 19 magnifies these infrastructure issues. In Reg 18 there was no mention of Aylsham having two sites and there has been no consultation with the Town Council or the residents on the allocation of two sites in Reg 19. Therefore, Reg 19 has not met the test of being justified and how t relates to reg 18.
* Two sites brings an increase to the proposed level of development to 83% on the consultation figure – 550 homes increases the total number of homes by 15.6%. The population of the town is likely to increase by a similar figure. This increase contradicts point 188 in the Strategy section which states there should be *“reasonable levels of growth in the main towns.”* This increase cannot be met by the current infrastructure in the town or by improvements offered by the plans within Reg 19. The second site was not consulted upon in reg 18 and is there for not justified.
* Recently planning permission has been given to windfall sites on significant numbers over and above the existing local plan and since reg 18 was consulted upon, this has not been been taken into account in regulation 19 with the additional site for Aylsham. Therefore Broadland have affectively over egged the additional numbers of extra housing required in this new proposed plan and therefor this is not justified.
* There is a lack of clarity and urgency in Reg 19 on the building of a primary school. A sound approach would be to state that, with all the primary schools in Aylsham full, the building of the school should take place as a priority along with the first site in regulation 18 and not after a second site, which has not been consulted upon or phasing of a second site to help resource this re infrastructure could be considered as the second site was not consulted upon in reg 18.
* On the original Reg 18 consultation there was a policy for a school in Aylsham, but this is watered down in Policy GNLP0311, 0595 and 2060 where it merely states “*2 ha of land at nil value to be provided for a new primary school on site”*. There are no details as to when this will come forward. The school needs to come before the houses. There is no capacity in Aylsham schools currently and the full impact of the new housing at Bure Meadows and Willow Park is still to be felt. Also, we understand, this is not a new school, but a replacement of the existing school and there is no indication of the increase in size. There is a lack of urgency in this policy. Schools in neighbouring villages are also at capacity and Aylsham High School is also near capacity. In Reg 18 there was consultation on one site and the provision of a school. As there has been no consultation for two sites, the significant impact this will have on the provision of education in Aylsham and the surrounding area has not been addressed. Therefore, the decision to allocate two sites is not justified.
* There is limited nursery provision in Aylsham. This will be put under significant pressure by 300 homes let alone the extra 250 homes allocated.
* The road network through the town will not cope with the extra traffic generated by the new school and the increased population. The developers of this site and the GNLP have put in some mitigating factors in the immediate vicinity of the sites but ignored the fact that the road from the town to the site is already busy and in places needs to be single tracked and cannot be widened to accommodate additional traffic. These road problems will be magnified with the second site on Norwich Road and the possible additional site at Badersfield in North Norfolk. In addition, creation of nearly 900 new homes within a short distance of Aylsham town centre will create severe parking problems, which, pre-Covid, was already a major issue in Aylsham and will returned when corvid is over. These issues highlight that the plans for Aylsham in Reg 19 are not sound as the document has failed to make a case that they are justified and will not significantly harm the town, no consultation on the second site in reg 18 took place, therefore considerations for infrastructure in this regard could of taken place.
* . The consultation in Reg 18 concerning the issue of health and social care was in regard to 300 homes. Aylsham Care Trust (ACT) responded to an earlier consultation that they would like to see a day unit built to try and keep people in their own home, which is in keeping with government policy. In addition, there are already urgent problems regarding medical care within the town, which Reg 19 fails to consider. Reg 19 fails to justify how two sites with 550 homes would not have an adverse impact on the health and social care of the town in putting forward the second site, Reg19 offers a 90-bed care unit/extra care housing. However, without consultation, the response to the needs of health and social care and infrastructure in general within Aylsham have not been met and there is a real problem of soundness in examining all heath care needs with doctors stretched in the surgery’s.
* The points above highlight how the allocation of two sites contradicts the Strategy section point 132 which states that new communities *“will be reasonable and sustainable communities”* and *“well integrated with our existing communities”*. Reg 19 is not justified as no consultation has taken place ude reg 18. For Broadland to consider moving forward to reg 19
* In point 136 it states that *“homes will have good access to services and facilities”* and they *“will enhance local character to meet the needs of all mixed communities”.* The failure to meet the infrastructure needs of the town, while wanting to expand the number of new homes by 83% from Reg 18, does mean that Reg 19 is not justified in respect of the document’s own strategy, as this second site has never been consulted upon.

**Is Regulation 19 effective?**

* I can find no evidence in the document that there has been any consideration of what is happening in the area to the north, north east and north west of Aylsham, which is in North Norfolk Local Authority. Recent announcements regarding a possible development of 300+ houses at nearby Badersfield will have an impact on Aylsham, as the majority of children from Badersfield attend Aylsham High School. There would also be increased pressure on the town centre and other services. This development is almost akin to a third site in Aylsham. Therefore, Reg19 fails to be sound on a basic issue, consulting with and working with the neighbouring authority (See **Section 33A of the Planning and Compulsory Purchase Act 2004 [F133 Duty to co-operate**]).

**Is Regulation 19 Consistent with National Policy**

* Central Government Policy is the move towards a carbon neutral footprint with awareness of climate change to be at the forefront of any decisions. Reg 19 fails to consider these issues in respect of Aylsham by the addition of a second site for development on the edge of the town where the residents will be dependent upon cars, thereby increasing the carbon footprint of the area, rather than looking to reach the carbon neutral target. One site, of which was consulted upon in Reg 18, was a rel concern regarding working towards a climate neutral target, however increasing the numbers with a second site to increase the number of new homes dependent on cars by 83% without consultation is not in keeping Central Government Policy and the Paris Accord.

**Conclusion**

* Reg 18 consulted on only one site, the second site that has been added with in reg 19 has never been consulted on and issues re infrastructure and the impact on the Towns Historic Imperative, the social and care need, long standing parking issues re services in the town re shops and other infrastructure resources, could not be considered by Broadland. Therefore, this means that Reg 19 has failed to be legally compliant, sound.
* Reg 19 has failed in soundness in its failure to keep to the strategy put forward as part of the Plan and central government policy.
* An important strategy of the document and central government policy is the move towards a carbon neutral footprint with awareness of climate change to be at the forefront of any decisions. Reg 19 fails to consider these issues in respect of Aylsham by putting forward two sites for development on the edge of the town where the residents will be dependent upon cars, thereby increasing the carbon footprint of the area, rather than looking to reach the carbon neutral target.

**What changes should be made to GNLP Regulation 19 in respect of Aylsham?**

**Recently planning permission has been given to windfall sites on significant numbers over and above the existing local plan and since reg 18 was consulted upon, this has not been taken into account in regulation 19 with the additional site for Aylsham. Therefore Broadland have affectively over egged the additional numbers of extra housing required as now outlined in reg 19 consultaion and therefor this is not justified and the second site should be removed**

 **The addition of a second site should be removed as this was not consulted and any possible infrastructure issues identified or examined or considered as outlined in my submission or the Historical imperative of the Old Town in the context of reasonable growth for main towns or has taken into account the collative effects of recent new home build that have already taken place. There for is not legally sound or properly prepared.**

 **If the second site is not removed at this stage, then to ensure that this is legally sound and properly prepared and justified, then this should be consulted on as per reg 18 stage again to make legally sound, compliant and properly prepared and justified which may mean the second site is removed or phasing takes place once infrastructure has been examined and considered or it is demonstrated that the infrastructure can support and pints with in my submission as outlined, then procced to reg 19 to ensure legally sound, compliant and properly prepared*.***