

**Norwich local development framework
Site allocations development plan document**

Public consultation on proposed sites for development and change

Regulation 25 (2)

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1. Introduction

1.1 In 2004, the government introduced a new system to prepare and deliver planning policy, as set out in the amended Town and Country Planning (Local Development) (England) Regulations 2004. The new system is called the Local development framework (LDF) and includes a family of policy documents to guide development in the city. Once adopted, this document family will replace the City of Norwich Replacement Local Plan (adopted 2004).

1.2 The principles of the LDF will be set out in the Joint core strategy, which will outline the council's vision, objectives and key policies on important issues like housing, employment and shopping. The strategy is currently being prepared jointly for greater Norwich by Broadland District, Norwich City and South Norfolk Councils, with Norfolk County Council.

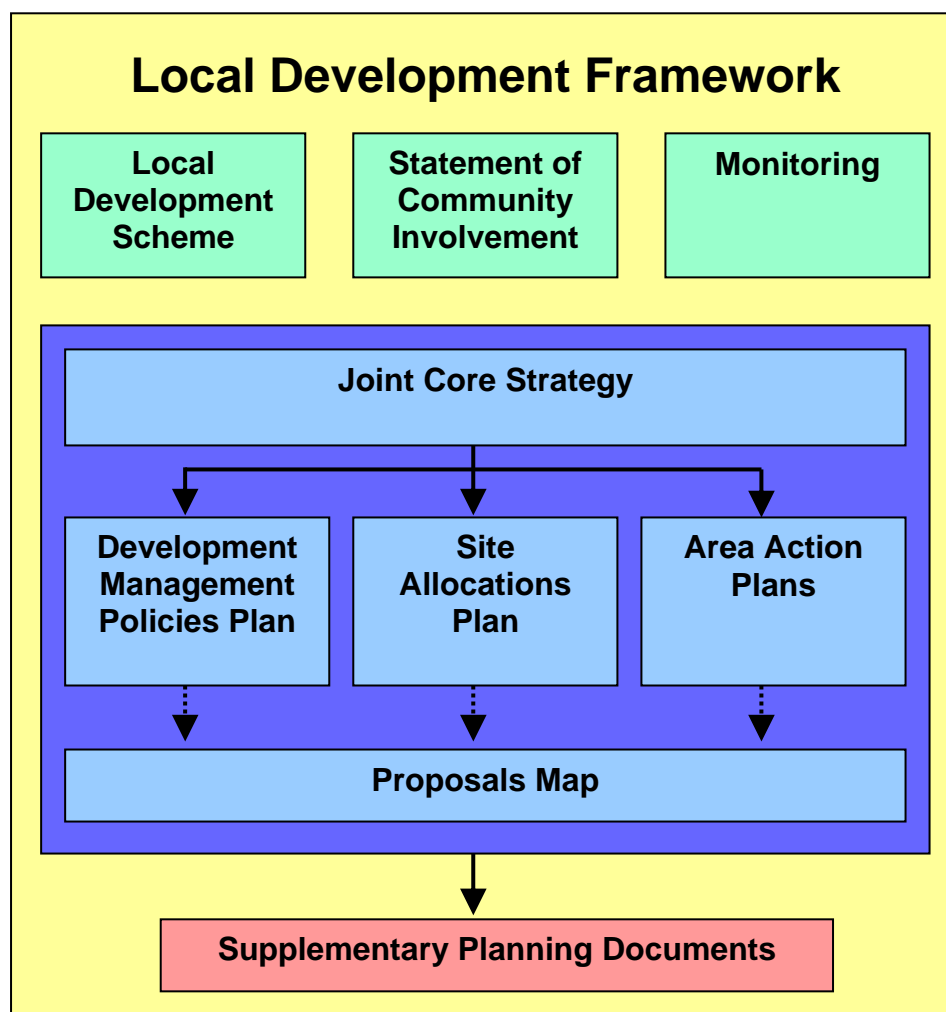


Figure 1: Local Development Framework documents

- 1.3 The Site allocations plan is part of the LDF and follows the Joint core strategy. It is being prepared individually by Norwich City Council for the Norwich area alone. This document will allocate sites for various land uses, including future development (eg. housing, employment) and change.
- 1.4 The production of the Site allocations plan comprises a number of different stages (see Table 1 below) and involves a substantial amount of community involvement, consultation and an independent examination. This document forms the second stage of public consultation and includes sites that have been shortlisted after last year's round of consultation. This is an important chance to get involved and have your say.

	Evidence gathering (including a call for sites)	Opportunities for the public to put forward sites for development or change	2009
	Public consultation (1)	Consultation based on initial sites proposals	Nov 2009 – Feb 2010
We are here 	Public consultation (2)	Consultation based on the shortlisted sites after the first round of public participation	Jan – Mar 2011
	Pre-submission consultation	Opportunity for public comments on the soundness of the proposed submission document	Nov – Dec 2011 (anticipated)
	Submission	Submission to the Secretary of State and independent public examination	Early 2012
	Adoption	The council adopts the Site Allocations Plan	Late 2012

Table 1: Key stages of the *Site allocations plan*

- 1.5 After this round of public consultation, we will produce a pre-submission draft plan taking all the comments into consideration. You will then have another chance to comment before we submit the draft document to the Secretary of State for public examination. However, comments can only be made at the next stage on the soundness and legal compliance of the document, i.e. whether appropriate procedures were followed and whether necessary issues have been taken into account.
- 1.6 An independent public examination will be taking place after submission of the document to the Secretary of State. Once the document is found sound, the Council will formally adopt it as a Development plan document, which is expected to be late 2012.

2. Other Development plan documents in the LDF

East of England Regional Spatial Strategy

- 2.1 The East of England Regional Spatial Strategy (RSS) provides regional level guidance for this document. The coalition government however announced its intention to revoke this document. Therefore, the weight that it carries as a material consideration is diminished. However, the evidence base used to prepare the Regional Spatial Strategy is still valid, and will continue to be a major material consideration in the near future.

Joint core strategy

- 2.2 The Joint core strategy (JCS) sets out the key principles of the LDF, which will include the council's vision, objectives and key policies on important issues like housing, employment and shopping.
- 2.3 The JCS identifies the Norwich Policy Area (Norwich urban area with the first ring of fringe villages) as the focus for major growth and development with a need to deliver 21,000 dwellings from 2008 until 2026. In the City of Norwich area alone, at least 3,000 dwellings are needed to accommodate the growth.
- 2.4 The strategy proposes that Norwich will expand its function as an employment centre, including provision of high quality office premises and a diversity of uses across the area. It also identifies the need to enhance the retail function of the city centre, to provide for a substantial expansion of comparison retail floorspace of varied types and size of units to provide a range of premises. Three areas in the city centre have been identified in the JCS for comprehensive regeneration: the Northern City Centre area, St Stephens area and Rose Lane area.
- 2.5 The JCS also highlights the need of mitigating and adapting to the effect of climate change. Regeneration, development and growth will not only revitalise areas of deprivation, but also be essential to create sustainable places for people to live and work.

- 2.6 The JCS Examination in Public took place in November-December 2010 and the inspector's report is expected in early 2011. Should the inspector make binding changes to the plan, the draft Site allocations plan may need to be reviewed. If the plan were found unsound, a review of the plan making approach may be required.

Development management policies plan

- 2.7 The City-wide Development management policies plan provides more detailed, generic policies to complement the Site allocations plan. These policies will be used to determine planning applications and set out spatial planning requirements, protecting the natural and built environments for example. The draft Development management policies plan is published for consultation at the same time as the consultation on the Site allocations plan.
- 2.8 There is a close relationship between the DM policies & Site allocations plans, and some overlap between them. For the purpose of clarity, the site allocations plan only allocates land where change is proposed to the current use. Where sites have been proposed to be allocated for a particular use but are already in this use, (For example, employment areas) there is no change to the current land use and such sites are covered by the relevant policies in the Development Management policies plan. A detailed list of these sites is included in Appendix 5 (Sites not being carried forward).

Northern city centre area action plan

- 2.9 The Northern city centre area is one of the areas identified for significant urban regeneration and change in the JCS. This development plan document was adopted by the council in March 2010. There are a number of sites allocated separately in the Northern city centre area action plan. These sites are not included in this Site allocations plan because the council has already reached a decision on them. However they will form part of the overall allocations and will be shown in the final proposals map.



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Figure 2: Northern City Centre Area Action Plan boundary

3. The site selection process

Call for sites

- 3.1 The first stage in the site selection process was the 'call for sites' in early 2009. From February to April 2009 the council invited developers, agents, community groups and the public to suggest sites for possible development or change. The sites put forward, along with sites identified through the Local Plan and background studies, were included in the draft Site allocations plan (Regulation 25 document) published for public consultation between November 2009 and February 2010.

Stage one public consultation

- 3.2 The public consultation involved a wide range of consultees, including statutory and interest bodies and residents across the city. Specifically, all neighbours within a certain distance of a proposed site were sent invitation letters for comments. There were approximately 8,000 letters sent in total to seek their views. Officers held a series of exhibitions across the city and held neighbourhood focus groups at different locations. Officers also attended meetings of external organisations to deliver presentations and answer questions.
- 3.3 At the end of the consultation, about 400 representations were received. It formed part of evidence base of the site selection process.

Site selection

- 3.4 In order to filter the initial long list of sites they were assessed against three main criteria: suitability, sustainability and availability.
- 3.5 Suitability was the first stage of the assessment and involved both desktop study and site visits. This stage included a set of criteria (e.g. transport, access, environment designations, contamination, viability etc) with a scoring system. However, the individual scores for the sites were not added up for individual sites because the conclusion about individual sites' suitability is a mix of factors. It is important to be able to compare

different aspects of how sites perform under different criteria. It also allows constraints and advantages to be identified in the summary.

- 3.6 Sustainability assessment looks into the social, economic and environmental issues and was considered separately in the Sustainability Appraisal.
- 3.7 The issues of viability were considered alongside the suitability assessment. This involves a range of issues including likely land value, site preparation cost and ransom strip issues. These issues have been taken into account in making an assumption of the density of a site and the likely developer contributions and facilities (e.g. footpath and on street crossing point) could be provided in a development.
- 3.8 At a later stage of the assessment, sites without ownership information were subject to an ownership search through the Land Registry. Owners identified in the search were sent questionnaires regarding to the availability of the potential sites and the likely timescale of delivery. This stage has reinforced the existing assessment and helped to form a robust evidence for the deliverability of the possible development sites.

Which sites are not being carried forward and why?

- 3.9 A number of sites included in the last round of consultation are not being carried forward into the shortlisted sites, or have been included but with changed boundaries. This is due to the following reasons: (detailed list of these site are listed in Appendix 5.)

Sites being considered in the Development management policies plan

- 3.10 A number of sites have been proposed to be allocated for a particular use but are already in this use (for example where an employment allocation is proposed for land currently in a defined employment area). In cases like these where no change of use is proposed, these sites are not included in the Site Allocations plan. Instead, they will be covered by relevant policies in the Development management policies plan which is currently being developed.

Sites being integrated into a larger site

- 3.11 Some of the proposed sites are constrained by their size and shape, and do not on their own constitute reasonable acceptable development. This type of sites however can be judged acceptable if they are considered jointly with neighbouring sites. Therefore a number of such sites have been integrated with other proposed sites to form an improved comprehensive scheme and to avoid piecemeal and stand alone development.

Sites being found not suitable or less suitable

- 3.12 During the site assessment process, all sites were assessed against the suitability and sustainability criteria. As a result, a range of sites were found to be unsuitable or less suitable for development. A list of these sites and the reasons of discounting them are also listed in the appendices of the consultation document. A list of these sites and the reasons of discounting them are also listed as part of Appendix 5.

Site being too small to allocate

- 3.13 Some sites, although suitable for development, are not being allocated due to their size. The original criteria used at earlier stages include sites of 0.1 hectare in city centre or 0.2 hectares in rest of the city. However, a small number of smaller sites, i.e. under the threshold, are also included as they could potentially deliver more than 10 dwellings. Any sites below the threshold and can only provide less than 10 dwellings are not being carried forward. Instead, they will be dealt with by Development management policies plan in the future as windfall sites.

4. What is proposed for the shortlisted sites?

- 4.1 The plan has to meet the requirement set out in the Joint Core Strategy, particularly the requirement that land should identified for housing growth for a minimum of 3,000 dwellings between 2008 and 2026. The plan should also give consideration for the office requirement in city centre locations.
- 4.2 The shortlisted sites comprise a range of different uses, i.e. housing, employment, mixed use and other uses (e.g. educational, community uses etc). These sites are separately listed in the appendices attached.

Housing

- 4.3 The sites proposed for allocation in the plan are estimated to have the capacity to provide for about 3,460 dwellings overall across the city. These housing proposals are included in the housing category as well as in the mixed use category. The initial density assumptions used are 100 dwellings per hectare for the city centre and 50 dwellings per hectare for the rest of the city. Where a mixed use development is included (which includes a housing element) a discount of 20 percent is applied to those sites. However, during the assessment and subsequent site visits, the density assumptions have been adjusted to reflect site constraints, deliverability and different mixes where appropriate.
- 4.4 The proposed development of 3,460 dwellings, as well as new housing permissions being granted during 2008 and 2010, gives a reasonable margin to achieve the requirement of 3,000 dwellings between 2008 and 2026. Further housing above this may also be provided as a result of windfall development.

Employment

- 4.5 Many employment allocation sites included in the earlier consultation were previous allocations identified in the Local Plan. Therefore, allocation is not necessary as they do not involve any change of use. As

discussed earlier, these will be considered in the Development management policies plan.

- 4.6 There are a small number of previous employment sites which have been proposed for housing or mixed use development. The assessment has found some of these sites to be more suitable for housing and to help achieve the housing requirement set out in the JCS. The reasons and justifications are fully explained in the consultation document under relevant sites.

Other uses

- 4.7 Some sites have been proposed for uses other than those referred to above, including some sites proposed for educational use by the university. Some of these sites were found to be small infill development within the university campus boundary. A few potential development sites outside the university boundary were treated as university boundary extension, and future development of these sites will be guided by the planning policy set for the university in the Development management policies DPD. There is also a site allocated for community use in Hall Road.
- 4.8 There is also a need to identify sites to deliver additional pitches for Gypsies and Travellers and Travelling Showpeople. However, no sites have been put forward for use by Gypsies and Travellers and the council will work to identify suitable sites that may exist. This includes examining proposed housing land, especially council-owned land where served by good access to facilities. The council is also working closely with Broadland and South Norfolk on the possibility of joint schemes to help deliver such accommodations.
- 4.9 In addition to the sites proposed for uses discussed earlier, the council will seek adequate community, leisure and culture facilities. These are key elements of sustainable development and sustainable communities and can also form part of mixed-use schemes. If further sites are considered

to be necessary for such uses, provision will be required through Development Management Policies.

- 4.10 Sites solely relating to protection, such as urban greenspace or further natural and built environment conservation, will normally be considered through the Development Management Policies DPD and shown on the adopted proposals map.

5. Approach towards existing committed sites

Previous Local plan allocations

- 5.1 The Local Plan (2004) allocated sites for a range of uses. Those not yet developed have been considered for inclusion in the shortlisted sites. Unless there is strong evidence which reveals that the site is not suitable or available, these sites are proposed to be allocated for the uses as stated in the Local plan.

Sites with extant planning permissions

- 5.2 Among all the shortlisted sites, there are a number of sites have extant planning permissions. The general approach towards these sites is that, as a starting point, these sites should be developed in line with the permissions granted. However, in the case of a planning permission which has expired, new development principles have been set in the form of an allocation for this development site. The new conditions will generally be similar to or same as the nature of an existing permission, however, the exception to this is where a different use is considered more appropriate in the future development should a planning permission expire.

6. Sustainability appraisal

- 6.1 It is a requirement of the plan-making process that sustainability appraisal is undertaken in parallel with the development of a plan such as this one. Sustainability appraisal is a systematic process to ensure sustainability considerations are integrated into plan-making process and environmental, economic and social impacts are taken into account.
- 6.2 A scoping report was prepared setting out a proposed sustainability framework. The scoping report was published for consultation alongside the previous draft site allocation plan.
- 6.3 A Sustainability appraisal is prepared by applying the framework set out in the scoping report and a consultant has been appointed to undertake the exercise independently. For those sites with sustainability concerns, mitigation measures will be included in future site policies to make sure these issues are appropriately addressed.

7. Appropriate assessment

- 7.1 Appropriate assessment (AA) is mandatory for all development plan documents as required by the EU Habitats and Species Directive. The AA is taken to avoid adverse effects of plans, programmes and projects on Natura 2000 sites and thereby maintain the integrity of the Natura 2000 network and its features.
- 7.2 A screening exercise was undertaken by independent consultants to ascertain whether there is a need for a full Appropriate Assessment. This concluded that the Site Allocations Plan alone or in combination would not have an adverse affect upon the integrity of any European site.

8. The consultation

- 8.1 This is the second consultation under Regulation 25 of the plan-making regulations. Although the sites included in this document have been

8.2 We welcome comments from public and organisations on all the shortlisted sites at this stage in the preparation of the site allocations plan. Please use the response form provided to make comments. The document, the sustainability appraisal and the response form can be accessed online via the city's website at www.norwich.gov.uk. You can respond by completing the downloaded response form and submitting it to us electronically to ldf@norwich.gov.uk or by posting it to **Planning Policy and Projects Team, Room 336, City Hall, St Peters Street, Norwich, NR2 1NH**. Alternatively, please call the council's customer contact centre on 0344 980 3333 if you have enquiries or would like consultation documents in alternative formats.

8.3 The consultation will close at **5pm on Thursday 24th March 2011**.

Please note:

The pre submission draft of the document in November 2011 will contain the policies for allocated sites. These will be submitted to the Secretary of State in early 2012.