

Report to	Sustainable development panel 27 November 2013	Item
Report of	Head of planning service Norwich City Council response to Regulation 19 Consultation on South Norfolk District Council local plan documents:	5
Subject	<ul style="list-style-type: none"> • Site Specific Policies and Allocations Document • Development Management Policies Document • Wymondham Area Action Plan 	

Purpose

This report provides members with Norwich City Council's proposed response as local planning authority to the public consultation on the South Norfolk District Council Regulation 19 versions of the site specific policies and allocations plan, development management policies plan and Wymondham area action plan documents.

Recommendation

That members note the contents of this report and comment accordingly.

Corporate and service priorities

The report helps to meet the corporate priority "A prosperous city" and the service plan priority to develop the local economy, promote inward investment and regeneration activities.

Financial implications

There are no direct financial considerations.

Ward/s: All wards

Cabinet member: Councillor Stonard – Environment and transport

Contact officers

Mike Burrell, Planning Policy Team Leader 01603 212525

Sarah Ashurst, Planner 01603 212500

Background documents

None

Report

Background

1. On 1 November 2013, South Norfolk District Council (SNDC) commenced consultation on their site specific policies and allocations document (Site allocations plan), development management policies document (DM policies) and the Wymondham area action plan (AAP). Comments are invited on the proposals by the 13th December 2013. This report summarises the key points for consideration and includes a proposed response on behalf of the City Council in appendix 1. The consultation can be found at the following link: <http://www.south-norfolk.gov.uk/planning/1952.asp>
2. The city council has responded to the previous stages of consultation, Regulation 25(1) and Regulations 25(2). These responses are in Appendix 2 and 3.
3. The documents currently being consulted on have taken a long time to prepare and the city council has worked with officers of SNDC to aid this process. Once adopted the documents will form key parts of the Local Plan for South Norfolk, alongside the adopted Joint Core Strategy (JCS).

Key Considerations

4. The council is supportive of the positive approach being taken in the documents prepared by SNDC to implement the JCS.
5. With regard to the site allocations plan, the proposed locations of housing are in close proximity to existing transport networks and connections and Bus Rapid Transit (BRT) routes ensuring strong links with the city for retailing and employment opportunities.
6. Norwich City Council welcomes the fact that sites it has previously objected to have not been allocated for development. These sites are close to or in the Yare Valley in Keswick and Colney.
7. The plans will implement the JCS priority for the development of knowledge based industries in Colney, which forms part of the research park along with the University of East Anglia. The city council is therefore highly supportive of the allocation of additional land at the Norwich Research Park for a regionally significant site for research and development, higher education and hospital related uses.
8. The plans also provide the local policy safeguards to retain the role of Longwater as an employment area and to enable retail proposals that could compete with the role of the city centre to be rejected.
9. The DM policies, alongside specific requirements in the site allocations plan, will ensure new and improved existing green infrastructure links which will be beneficial for residents of the city, as well as those of South Norfolk. Specifically, we welcome the inclusion of the requirement to provide proportional contributions to improve access to the Yare Valley and Bawburgh /Colney Lakes in policies EAS1 and COS1 and support the allocation of 73.5 hectares for a water based country park at Bawburgh (policy BAW 2) adjacent to the Bowthorpe Country Park.

10. Further, the Wymondham AAP takes a positive approach to providing dwelling numbers, and employment land in accordance with the JCS.
11. DM policies DM 4.6 and 4.7 take a positive approach to requiring any development close to the Yare valley and the southern bypass to protect the setting, gateways and views to and out of Norwich. However, due to changes in national policy in the National Planning Policy Framework (NPPF), these policies are no longer as restrictive of development as those in the current South Norfolk Local Plan.
13. The response welcomes the requirement for major growth locations to be masterplanned. Overall the gross densities proposed in major growth locations are low, averaging a density of 17 dwellings per hectare. The provision of significant amounts of green infrastructure is supported in the response. However, it is pointed out that in the absence of specific policy requirements for the amounts of GI to be provided at each major growth location, it will also be important to ensure that the housing is built at relatively high densities close to public transport networks and services. This is necessary to ensure the benefits of sustainable access and prevent overly dispersed development. Since policy EAS1 does do this for Easton, it is proposed that the other major growth location policies (particularly COS1 for Costessey and HET1 and HET4 for Hethersett) should contain a similar clause covering this issue.

Conclusion

14. The city council's full draft response to the consultation is appended in full at Appendix 1. It is included here for members to note the content and make comment for any additional changes that may be required.
15. The response will be submitted before 13 December 2013 deadline.

Appendix 1: Draft Response of Norwich City Council to Regulation 19 – December 2013

12 November 2013

Mr T Horspole
Planning Policy Manager
South Norfolk House
Swan Lane
Long Stratton
Norwich
NR15 2EX

Your reference REG 19 Pre-submission Documents: Site Specific Allocations/DM Policies/Wymondham AAP

Our reference

Dear Mr Horspole

South Norfolk Local Plan – Regulation 19 consultation on:

Site Specific Policies and Allocations Document

Development Management Policies Document

Wymondham Area Action Plan

Thank you for consulting Norwich City Council in relation to the above regulation 19 plans. We welcome the opportunity to work closely with you, particularly in relation to proposals close to the administrative boundary of the city and in helping to ensure the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) is implemented effectively. This response is issued on behalf of the City Council as a local planning authority. Any comments made by colleagues with land ownership responsibilities will be issued separately.

This response takes a theme based approach, commenting on the Site Allocations and Development Management Policies documents together. It then comments separately on the Area Action Plan for Wymondham.

The Site allocations and Development Management plans:

Norwich City Council is generally supportive of the approach taken to implementing the JCS. Specifically, Norwich City Council is supportive of the approach taken to:

Energy policy - the development management policies take a positive approach to the complex emerging policy area for energy in relation to carbon offsets.

Employment land protection and allocation: In line with the JCS which identified Longwater as a location for employment rather than retail development, both development management policy 2.1 at section 2) and site allocation policy COS4 seek to prevent new town centre uses such as retailing being developed at Longwater. It is essential that this policy approach, which is also in line with the currently adopted approach in the South Norfolk Local Plan, is taken in relation to proposals for town centre uses at Longwater. The development of further town centre uses in this location would undoubtedly have a significantly detrimental impact on the city centre in terms of its attractiveness as a retail destination. The City Council is also highly supportive of the allocation of land at the Norwich Research Park as set out in the JCS for a regionally significant site for research and development, higher education and hospital related uses.

Green Infrastructure; the plans take a positive approach to green infrastructure (GI), which complies with Policy 10 of the Joint Core Strategy (JCS). Evidence studies on GI, landscape character and ecological networks have been successfully synthesised to inform policies which will enable identified GI priorities to be delivered. This should enable the long term development of a well planned multi functional habitat and sustainable access network which will also enhance flood resilience.

Specifically, we welcome the inclusion of the requirement to provide proportional contributions to improve access to the Yare Valley and Bawburgh /Colney Lakes in policies EAS1 and COS1. The City Council also supports the allocation of 73.5 hectares for a water based country park at Bawburgh (policy BAW 2) adjacent to the Bowthorpe Country Park. We support the requirement to have public access with footpath links to major residential developments. It will be important to ensure footpaths links are made to existing and proposed routes in Bowthorpe Country Park to enable the extension of the Yare Valley Path through the water park and to provide links for the residents of Bowthorpe.

The City Council supports the approach taken through DM policies DM 4.6 and 4.7 to retain a Yare valley character area and a southern bypass landscape protection zone to protect the setting, gateways and views to and out of Norwich from inappropriate development. We note that, due to changes in national policy in the National Planning Policy Framework (NPPF), these policies are no longer as restrictive of development as those in the current South Norfolk Local Plan.

The Regulation 19 sites plan includes several significant sites proposed for development close to the city boundary which will assist in implementing the JCS. Most notably, these are at:

- Costessey (allocated for 500 new dwellings and an extension to the Longwater employment area),
- Easton (900 dwellings and a new local centre)
- Colney (allocated for significant science park development and hospital expansion)
- Keswick (a small employment site)
- Trowse (mixed use development and a Park and Ride site).

Overall Norwich City Council is supportive of these allocations, which are in conformity with the JCS. The council welcomes the focussing of the great majority of the housing

development to locations that will be accessible to the planned bus rapid links to city centre retailing and job opportunities.

Norwich City Council also welcomes the fact that unsuitable sites previously proposed for development close to or in the Yare Valley have not been allocated. These include sites close to or in the Yare Valley in Keswick and Colney.

However, the council does have some concerns that the housing developments for the major growth locations in Costessey (policy COS1) and Hethersett (HET1 and HET4) are planned at very low gross densities, averaging about 17 dwellings per hectare. This is half the density of the planned development at Three Score, Bowthorpe in Norwich, which will provide a significant proportion of green space, whilst benefitting from the principles of good urban design which enable new development to be sustainable. Though the provision of significant amounts of green infrastructure is welcomed, it will also be important to ensure that the housing is built at relatively high densities close to public transport networks and services to ensure the benefits of sustainable access. It is therefore proposed that the policies should contain a clause covering this issue similar to that in policy EAS1 for Easton. Whilst it is accepted that densities will be lower than proposed in an urban environment such as Norwich, focussing development close to services and public transport routes remains important.

Wymondham Area Action Plan

Norwich City Council supports the Area Action Plan, which takes a positive approach to implementing the strategic aims of the JCS. In particular, the council is supportive of:

- The approach of providing for 2,200 dwellings in the town, in broad compliance with JCS policies, with a slight over allocation to allow for non delivery. It is agreed that constraints (strategic gaps, school capacity and the town's historic and landscape setting) prevent any of the JCS NPA floating housing growth being provided for in Wymondham.
- Employment allocations in Wymondham to provide for 20 hectares of land as required under Policy 9 of the JCS, including new allocations of 15 hectares.
- The requirement that developments contribute to the delivery of infrastructure and facilities through S106 or the payment of CIL, including Bus Rapid Transit, improvements to the Thickthorn junction and Green Infrastructure enhancements.
- The positive approach to green infrastructure;
- The retail policies, which support retail development in Wymondham appropriate to its place in the retail hierarchy set out in policy 19 of the JCS.

If you have any questions concerning these comments, please do not hesitate to contact me.

Yours sincerely

Michael Burrell,
Planning Policy team Leader,
Norwich City Council.

Appendix 2: Response of Norwich City Council to Regulation 25(1) – 18th November 2010

Regeneration and Development
Norwich City Council
City Hall
Norwich
NR2 1NH

Mr T Horspole

Planning Policy Manager

South Norfolk House
Swan Lane
Long Stratton
Norwich NR15 2XE

18th November 2010

Your reference

Our reference

Dear Mr Horspole

South Norfolk LDF - Site Specific Policies and Allocations Document - Initial Public Consultation (Regulation 25)

Thank you for consulting Norwich City Council in relation to the above. As an adjoining local planning authority and partners within the Greater Norwich Development Partnership the publication of the above document is welcomed as a start on an important part of the implementation of the emerging Joint Core Strategy for Norwich, South Norfolk and Broadland.

Unfortunately due to the pressures on us during the consultation period we have not been able to devote the time we would have liked to preparing this response nor have we had the opportunity to get member input into this response. However, you are clearly at an early stage in preparation of the sites allocation document and we would welcome the opportunity to work closely with you in taking this matter forward, particularly in relation to the emerging proposal close to the administrative boundary of the City.

In this initial response there are three particular issues we would seek to raise at this stage. I will address these in turn:

1) Possible sites proposed close to the City boundary

Clearly you have been very successful in getting landowners and others with an interest in land to engage with the process you are leading and are able to seek views on a very large number of possible sites for inclusion in the Site Allocations DPD. Hopefully this will ensure that all the sites that are eventually chosen for inclusion in the DPD are well located and capable of sustainable development. However, the large number of sites you are consulting on does create difficulties in being able to respond on each one and does create a risk that it will be perceived that many of these sites will be required to provide for the development envisaged in the JCS. In this context it may have been

helpful to give an indication of the total area of the sites put forward for development and some indication of what proportion of these may be required in order to deliver the targets contained in the emerging JCS.

The above factor may be particularly true in relation to areas close to Norwich. The cumulative impact of all the sites proposed for development close to the city boundary would undoubtedly be unacceptable and would have a significant detrimental impact on the setting of the city in addition to the delivery of green infrastructure approach outlined within the JCS.

More locally, a number of the sites proposed both individual and cumulatively pose a significant threat to the integrity of the Yare Valley. It is vitally important, in view of the location of the city to the north of the Yare Valley and the levels of growth proposed in parts of the Norwich Policy Area to the south of the Yare Valley, that the local authorities co-operate to ensure that a consistent approach is taken to development within the Yare Valley on both sides of the river and that development taking place outside the valley seeks to contribute to enhancing the value offered by the valley to the green infrastructure network. The evidence base which underpins the JCS offers much support for such an approach.

With regard to the above it should be noted that the City Council is likely to object strongly to forms of development within the Yare Valley that do not enhance its current role in terms of green infrastructure. In this context we wish to register initial opposition to the following sites put forward in the document.

Site reference	Parish
025	Keswick
029	Colney
261/266	Colney
263	Colney
505a/b	Cringleford

2) Possible strategic sites further afield

In accordance with the emerging JCS a number of sites are subject to consultation around Hethersett, Wymondham and Long Stratton. It is vital that such sites are brought forward in a planned manner and in accordance with the requirements of the JCS. The intention to prepare Area Action Plans for Wymondham and Long Stratton is welcomed. Such a process should allow for full consideration of the merits of alternate development locations and ensure that development provides for high quality sustainable transport links into the city hopefully offering benefits to residents in the south of the city in addition to serving the new development locations and providing access to the City Centre.

It is noted that there is no such mechanism proposed for delivering growth at Hethersett or at Easton/Costessey. In taking forward site allocations in these areas the City Council would welcome early involvement in the drafting of policies to ensure that issues such as

the provision of green infrastructure and the delivery of public transport improvements are considered with the City's residents in mind.

3) Approach to the development of the Norwich Research Park

It is noted in question 7 of your consultation document and in other places that it is still your intention to prepare an Area Action Plan for the Norwich Research Park. This came as a surprise to the City Council as it was understood this was no longer intended.

As you are aware the City Council is highly supportive of the principle of development at the Norwich Research Park as set out in the JCS for a regionally significant site for research and development, higher education and hospital related uses. It is crucial that proposals for NRP retain this focus and do not become seen as a more general employment area. In this regard, and as widely recognised, UEA is a key and integral part of the NRP. Not only will knowledge derived from UEA research be a significant driver of activity at the NRP but also the current campus and future development in this part of Norwich will contribute significantly to the overall offer of the Research Park. To illustrate this point UEA is currently actively progressing proposals for an Innovation centre near their campus in Norwich. It is vital that such opportunities are properly reflected and exploited in any overall strategy for the NRP.

As you are aware the 2007 Local Development Scheme for Norwich contained a proposal for a NRP/UEA joint area action plan which was to be commenced in Aug 2008 and adopted in July 2011. This was mirrored by a similar commitment in South Norfolk's 2007 LDS (albeit with a slightly different proposed date for adoption). However, in July 2009 in the absence of any progress on the joint AAP, any likelihood of this being commenced, and with the support of South Norfolk DC the City Council agreed not to proceed with a Joint Area Action Plan for the Norwich Research Park with South Norfolk Council. Instead it endorsed an approach proposed by the University of East Anglia for a development strategy that will inform the local development framework for Norwich.

Subsequent to this the city's updated Local Development Scheme was published in March 2010 and contains no reference to a joint AAP. Work has continued with UEA on a Development Framework Strategy (DFS) for UEA which has been subject to extensive consultation and is shortly to be finalised. This DFS, subject to member endorsement (due to be considered in December), will inform the reg 25 consultation on the city's site allocations document due early in the new year.

It is a matter of increasing concern that there is an apparent lack of strategy and drive behind how the NRP is being progressed through the planning process. In particular it is not clear how any overarching spatial framework covering UEA and the rest of NRP is to be developed nor how emerging JCS policy 9 and other growth possibilities highlighted in the JCS at Cringleford are to be taken forward. It is important that the local authorities, in consultation with key stakeholders, developers and local communities take this matter forward, making clear infrastructure enhancements and community benefits that are expected. If there is a failure to do this there will be a danger that the process will be come driven by speculative proposals and may not best deliver what was intended.

This issue should be clarified as soon as practicable by South Norfolk Council. The City Council would be willing to participate in and support any process designed to deliver the sensible planning of the area.

However, in view of the lack of progress made in relation to the Area Action Plan to date and the statutory processes associated with the production of AAPs it is questioned whether this remains the best approach, either for the wider NRP or just for the parts in South Norfolk. Some process more similar in nature to the DFS may well be the most appropriate to inform latter stages of your site allocation process and ultimately inform Supplementary Planning Documents.

Yours sincerely

Graham Nelson

Head of Planning and Regeneration Services

Tel 01603 212530

Appendix 3: Response of Norwich City Council to Regulation 25(2) – 18th November 2011

Regeneration and Development
Norwich City Council
City Hall
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NR2 1NH

Mr T Horspole

Planning Policy Manager

18th November 2011

South Norfolk House
Swan Lane
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Norwich NR15 2XE

Dear Mr Horspole

South Norfolk LDF - Site Specific Policies and Allocations Document - Regulation 25 stage Public Consultation

Thank you for consulting Norwich City Council in relation to the above. Please see our representations to your consultation below. We welcome the opportunity to work closely with you, particularly in relation to the emerging proposals close to the administrative boundary of the city.

1) Site allocations

As mentioned in your letter, we have not repeated the comments we made in the last round of consultation, therefore please also refer to our previous comments. In relation to the new sites that have been put forward, we would like to raise our initial concerns over the two proposals below:

Site reference	Parish	Proposed use
1144	Colney	Employment
R0505b	Colney	Residential

It is of concern that these individual sites and their cumulative impact with other sites pose a significant threat to the Yare Valley. It is important that the local authorities co-operate to ensure that a consistent approach is taken to development within the Yare Valley on both sides of the river and that development taking place outside the valley seeks to contribute to enhancing the value offered by the valley to the green infrastructure network. The evidence base which underpins the JCS offers much support for such an approach. We are supportive of green space allocations along the River Valley (sites 1143 and R0505a) which would contribute to an enhanced access to the river and provide riverside walks. The proposed open space site 1143 could provide a

valuable section of the Yare Valley Walk, contributing to a link between Cringleford Bridge and Keswick Mill. There is very little prospect of improving this section of the walk north of the river, a section of which follows the road at Church Land, with private gardens bordering the river through this part of Eaton.

2) Green infrastructure

The GNDP Green Infrastructure Delivery plan shows the green infrastructure opportunity areas in and around Norwich and the JCS shows the green infrastructure priority areas as adopted. These show that any development in the area of South Norfolk to the west of Bowthorpe should incorporate strategic green infrastructure as part of the "Water City" Green infrastructure priority area. The JCS Policy 10 requires development in Easton/Costessey to provide enhanced access to the Yare Valley including creation of a country park at Bawburgh Lakes. Therefore any sites proposed in Costessey and west of Bowthorpe should take into account the green infrastructure areas and incorporate green infrastructure to create and complete the strategic link between the Yare and Wensum valleys required by the JCS.

Yours sincerely

Mike Burrell

Planning Policy Team Leader

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