

Report for Resolution

Report to Cabinet
19 January 2011

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Report of Head of Planning and Regeneration

Subject Norwich Site Allocations and Site Specific Policies
Development Plan Document for consultation

Purpose

To seek authorisation to progress with public consultation on the Norwich Site Allocations and Site Specific Policies Development Plan Document (the 'Site Allocations plan'). The report explains the site selection process and the proposed sites shortlist.

Recommendations

1. To authorise the second stage of Regulation 25 consultation for the Site Allocations plan.
2. To give delegated authority to the Director of Regeneration and Development to make minor changes required to the document following Cabinet.

Financial Consequences

The costs involved in this public consultation are planned for in existing budgets.

Risk Assessment

1. The public examination for Joint Core Strategy (JCS) took place in November and December 2010. The outcome of the public examination is expected in early 2011; if the JCS is found to be unsound this will have a direct impact on the Site allocations plan.
2. There are risks associated with progressing plan making within a legislative framework that will be subject to change, as set out in the report to Cabinet on the Development Management Policies development plan document.

Strategic Priority and Outcome/Service Priorities

The report helps to meet the strategic priority "Strong and prosperous city – working to improve quality of life for residents, visitors and those who work in the city now and in the future" and the service plan priority to deliver the Local Development Framework for Norwich.

Executive Member: Councillor MacDonald

Ward: All

Contact Officers

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Background Documents

- Full suitability analysis of sites (available at http://www.norwich.gov.uk/webapps/atoz/service_page.asp?id=1708)
- Sustainability Appraisal report (available at link above)
- Appropriate Assessment report (available at link above)
- Response to first Regulation 25 consultation November 2009 to February 2010 (available at link above)
- Site maps (in hard copy from Planning Policy and at the meeting)
- Annex 2 Deal Ground and Utilities pre application advice note (available at link above)

Report

Introduction

1. Norwich's local development framework (LDF) is family of policy documents to guide development in the city which, once adopted, will replace the City of Norwich Replacement Local Plan (2004). This report is about the Site Allocations plan which the council is preparing as part of the LDF.
2. Norwich's other LDF documents comprise:
 - the Joint Core Strategy (JCS) which is the key LDF document and which provides the strategy to guide, manage and deliver the growth for the Norwich policy area to 2026. The JCS is prepared jointly for the Greater Norwich Area in partnership with Broadland District Council, South Norfolk Council and Norfolk County Council. It has now had its public examination, and should be adopted in early 2011.
 - the Development Management Policies plan, which is also on the agenda for this meeting. This is being produced by the Council to the same timescale as the Site Allocations plan, and sets out a range of policies to guide development and protect the natural and built environments.
 - the Northern City Centre Area Action Plan was adopted by the Council in March 2010. It allocates a number of sites in this area for development which are therefore not included in the Site allocations plan but will form part of the overall allocations for the city and will be identified on the final proposals map.
3. The changing legislative framework for planning has been referred to in detail in the report to Cabinet on the Development Management Policies plan. As stated in that report it is recommended that the consultation on both the Site Allocations and Development Management Policies plans should proceed as envisaged to provide the planning framework necessary to deliver the growth agenda.

Role of the Site Allocations plan

4. The Site Allocations plan reflects the policy framework set out in the JCS, and complements the generic policies contained in the Development Management Policies Plan. The Site Allocations plan will allocate sites for various land uses in Norwich City Council's area, including future development like housing or employment. It will also help to deliver the spatial elements of the Council's Sustainable Community Strategy. Key milestones for its preparation are set out in the Local Development Scheme.
5. Sites are allocated for the following reasons:
 - to ensure a supply of suitable and sustainable sites to provide homes, jobs and community facilities for the future;
 - to demonstrate how the city can accommodate at least 3,000 more homes

by 2026 as required by the JCS (as well as the 4,000 homes already with planning permission or allocated in the Replacement Local Plan). Allocations are only made where significant change is anticipated. Designations used to protect sites from development are included in the Development Management Policies plan;

- to review existing Local Plan allocations where appropriate to carry them forward for development.
6. The consultation document for the Site Allocations plan is in three main parts, which are attached as appendices 1-3 to this document. Appendix 1 is an introduction with all background information including an explanation of the methodology for site selection and how this has been applied. Appendix 2 sets out all shortlisted sites proposed together with further information about how they are to be brought forward. Appendix 3 sets out sites which were previously consulted on, but which are not proposed for development along with an explanation for this decision.
7. Further information is set out in appendices 4 and 5. Appendix 4 provides a summary of suitability and availability assessment of sites. In addition the Sustainability Appraisal will be made available to inform the public consultation and justify proposals: the non-technical summary of the Sustainability Appraisal is attached as Appendix 5. Other background and supporting documents will be made available to members electronically.

Background to the sites proposed in this plan: how have they been identified and selected?

8. 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 a draft document published for public consultation between November 2009 and February 2010. About 400 representations were received during the consultation, which form part of evidence base for the site selection process.

Site selection

9. In order to filter the initial long list of sites they were assessed against three main criteria: suitability, sustainability and availability.
- **Suitability:** this stage of assessment judged sites against a set of criteria (e.g. transport, access, environment designations, contamination viability etc). Appendix 4 provides further detail on this process and sets out a summary of suitability assessment on a site by site basis. Viability issues were considered alongside the suitability assessment. This includes issues such as likely land value, site preparation cost and ransom strip issues, which have been taken into account in making an assumption about site density and the likely facilities (e.g. footpath and crossing point) which could be provided in a development.

- **Sustainability:** this is assessed by the Sustainability Appraisal process, which examines social, economic and environmental issues raised by proposals and ensures that impacts are properly taken into account. A draft Sustainability Appraisal report of the emerging proposals has been produced by an independent external consultant. The Non-Technical Summary of this is attached as Appendix 5. The full draft report is also available electronically to members (as part of the Background Documents).
- **Availability:** part of the assessment process was to determine whether potential sites are available for development and the likely timescale of delivery. Most landowners who responded are willing to develop the land within the plan period. This stage has reinforced the existing assessment and helped provide robust evidence for the deliverability of the possible development sites. However, at this stage it cannot be ruled out that the Council will have to use its Compulsory Purchase powers to deliver some of the sites proposed for development.

10. 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:

- *Sites which will be covered by policies in the Development Management Policies DPD.* 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, but will be covered by relevant policies in the Development Management Policies plan.
- *Sites integrated into a larger site.* Some proposed sites are constrained by their size and shape, and do not on their own constitute reasonable acceptable development. but are judged acceptable if 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 found not suitable or less suitable.* During the site assessment process, all sites were assessed against the suitability and sustainability criteria as explained above. As a result, a range of sites were found to be unsuitable or less suitable for development. See Appendix 3 which lists these sites and the reasons of discounting them.
- *Site too small to allocate.* Some sites, although suitable for development, are not being allocated due to their size. The original criteria used at earlier stages included 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. Sites below the threshold which can only provide less than 10 dwellings are not being carried forward. Instead, they will be dealt with through Development Management policies in the future as windfall sites.

What is proposed for the shortlisted sites?

11. This is the second consultation under Regulation 25 of the plan-making regulations. Although the sites included in this document have been assessed and are shortlisted from the initial site list, the inclusion of a site in this document does not represent a decision by the council to allocate the site. However, it does provide an indication that the Council is favouring development of the site and it may be a material consideration to the determination of planning applications (albeit with very little weight at this stage in the plan making process).
12. The potential sites are proposed for specific uses that are set out in the consultation document. There are just over 80 sites shortlisted for the following types of development:

Housing

13. The sites proposed for allocation in this plan are considered to have the capacity to provide for about 3,460 dwellings overall across the city, some on housing allocation sites and some on mixed use allocation sites. 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 specific constraints, deliverability and different mixes where appropriate.
14. 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 set in the JCS between 2008 and 2026. Further housing above this may also be provided as a result of windfall development.

Employment

15. Many employment allocation sites identified in the earlier consultation document are designated for employment uses in the adopted Local Plan. Allocation of such sites is not necessary as no change of use is involved. As discussed earlier, these sites will be covered by the relevant policies in the Development Management Policies plan.
16. Two small parts of sites designated in the Local Plan for employment use are now proposed for housing. The assessment has found these sites to be more suitable for redevelopment as this could achieve positive environmental enhancements through improved strategic cycle and pedestrian linkages, as well as having a positive effect in achieving the housing requirement set out in the JCS. The reasons and justifications are more fully explained in the consultation document under the relevant sites.

Other uses

17. Some sites have been proposed for uses other than those referred to above, including some sites proposed for educational use by the university. Smaller sites constitute infill development within the university campus boundary. Two potential development sites outside the university boundary were treated as university boundary extensions, and future development of these sites will be guided by both the sites policy and the planning policy set for the university in the Development Management Policies DPD.

What categories of sites are not included in the shortlisted sites and why?

18. There is also a need to identify sites to deliver additional pitches for Gypsies and Travellers and Travelling Showpeople. However, no sites have been proposed for use by Gypsies and Travellers and the council will work to identify suitable sites. This includes examining proposed housing land, especially council-owned land where served by good access to facilities. The council also intends to work closely with Broadland and South Norfolk on the possibility of joint schemes to help deliver such accommodation.
19. 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.
20. 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.

Other appraisals and assessments

21. 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. 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. A Sustainability appraisal is prepared by applying the framework set out in the scoping report and a consultant has undertaken the exercise independently. For those sites with any sustainability concerns, relevant mitigation measures will be included in the site policy to make sure these issues are appropriately addressed.
22. Appropriate Assessment ensures that adverse effects on various designated habitats of international importance are avoided. 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.

23. A diversity impact is also being undertaken in accordance with the council's obligations to evaluate the effects of the plan on the equalities strands and consider the implications of the policies.

Consultation and public engagement

24. The regulation 25 public consultation is programmed to commence in February 2011 for 8 weeks. This will take the form of a combined planning consultation for the Site Allocations Plan and the Development Management Policies Plan. The consultation will be publicised through the media, the council's website, local organisations and community groups, and other targeted publicity.

Next steps

25. After this round of public consultation, the Council will consider all representations made and produce a pre-submission draft plan. The public will then have another chance to comment before the draft document is submitted to the Secretary of State for public examination. However, at that stage they will only be able to comment on the soundness issue of the document at next stage, i.e. whether appropriate procedure is followed and whether necessary issues have been taken into account etc.
26. An independent public examination will take 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.
27. The next planned stages in the work programme are:

Public consultation	Second public consultation on the draft policies (Regulation 25)	January – March 2011
Pre-submission consultation	Opportunity for public comments on the soundness of the proposed submission document (Regulation 27)	Late 2011
Submission	Submission to the Secretary of State and independent public examination (Regulation 30)	Early 2012
Adoption	The council adopts the Site Allocations Plan	Late 2012