

**Broadland Growth Triangle Area Action Plan (GTAAP)
Publication Version**
Report by Planning Policy Officer

Summary:	The Growth Triangle Area Action Plan (GTAAP) plans the delivery of 10,000 dwellings and tens of hectares of employment land to the north and east of Norwich. The main issues for the Broads arise from recreational impacts of designated sites. The GTAAP includes some proposed mitigation measures. This report details a proposed response to the GTAAP publication for consideration by the Planning Inspector.
Recommendation:	That the Planning Committee endorse the representations to Broadland District Council.

1 Introduction

- 1.1 The **Growth Triangle Area Action Plan (GTAAP)** has been prepared by Broadland Council. Previous consultation stages were:
- Parish Assessment (Feb to May 2008)
 - Principles for Development (Nov 2008 to Jan 2009)
 - Options for Growth (Mar to Jul 2009)
 - Exhibitions and Workshops (Sept to Oct 2011)
 - Issues and Options (Mar to June 2013)
- 1.2 Following Publication, the anticipated timeline is:
- Submission to Secretary of State (Dec 2014)
 - Examination in Public (Mar 2015)
 - Adoption (July 2015)
- 1.3 The purpose of the GTAAP is to enable and coordinate development to the north and east of Norwich in accordance with the requirements of the Joint Core Strategy.
- 1.4 The Growth Triangle has been identified for strategic scale growth as a result of the following factors:
- Access to strategic employment opportunities at Broadland Business Park and Norwich Airport Industrial Estate.
 - There are opportunities for high quality public transport

- Well related to existing services and facilities on the Norwich fringe.
 - Provides opportunities to deliver new neighbourhoods of a sufficient size to support a range of new services and facilities.
- 1.5 The GTAAP seeks to deliver 7,000 dwellings by 2026 rising to 10,000 thereafter, deliver employment opportunities, protect the amenity of existing communities and deliver the growth whilst protecting designated sites.
- 1.6 The publication version of the GTAAP can be found here: <http://broadland.limehouse.co.uk/portal/growthtriangleaap/probsub/aap?pointid=2737691#document-2737691>.
- 1.7 The policies map showing all the allocations and Green Infrastructure (Appendix A) can be found here: <http://www.broads-authority.gov.uk/broads-authority/committees/planning-committee/planning-committee-12-september-2014>.

2 Relevance to the Broads

- 2.1 First and most fundamentally, this is the largest development area that is near to the Broads.
- 2.2 The GTAAP area is located to the north-east of Norwich and includes parts of the parishes of Sprowston, Rackheath and Salhouse. At its closest the boundary of the GTAAP is 0.5km from the Broads Executive Area boundary to the north and borders the Broads boundary to the south of the 'triangle'.
- 2.3 Whilst the area of the GTAAP does not include any of the Broads Authority Executive Area and the proposals are considered not to have any direct effects on the Broads, the indirect effects are important to understand. Assuming an average of 2.2 people per household, over 15,400 people will live in the area by 2026 rising to over 20,000 thereafter.
- 2.4 With the Broads being an attractive area very near to the proposed development, some of the 20,000 new residents could therefore regularly visit the Broads and/or use it as their main recreational space.
- 2.5 Indeed this issue was raised during the production of the Joint Core Strategy (JCS) in its Habitats Regulations Assessment (HRA); there could be issues arising from recreational impacts on the designated sites (Ramsar, SPA and SAC sites).
- 2.6 The GTAAP does propose three areas of open space to act as mitigation for any impact on the designated sites (see map at Appendix A).

3 Proposed Comments

- 3.1 The comments below are set out in a way to justify the particular comment and propose changes.

3.2 Main Document

3.2.1 Page 5 first sentence. “Environment” challenges for the GTAAP

- Sound or unsound? Unsound
- Reason? Justified
- Comment: The Broads should be specifically mentioned here.
- Why? Because the Broads contains SAC, SPA and Ramsar sites and is an area renowned nationally for its landscape and has the status equivalent to a National Park. The Broads has a diverse and unique environment.
- Evidence: Broads Act 1988, SAC, SPA and Ramsar allocations (Natural England)
- Suggested change: Environment: Protecting important habitats and landscapes, including international and nationally designated sites including the Broads, UK’s most important wetland.

3.2.2 Page 6 bullet point above 1.7. Last sentence.

- Sound or unsound? Neither – clarification sought.
- Question: Should this say ‘...will be extended to all allocated sites...’?
- Why? The sentence does not seem to read well as it is currently written.

3.2.3 Section 3.3.

- Sound or unsound? Unsound.
- Reason: Justified.
- Comment: As stated at the Issues and Options stage, the description of where the growth triangle is relative to the Broads Executive Area is wrong. The growth triangle is near the Broads to the north and also to the south east. Please amend the description. Furthermore, please include a map at this section which shows the growth triangle and the Broads. The Broads is identified as being nationally important for its landscape character which is an essential element that should be added to the brief description.
- Why? The Broads is quoted throughout the document, HRA, and SA. Therefore showing its spatial relation to the growth triangle is essential. The Growth Triangle lies between two major river corridors. It is also an area renowned nationally for its landscape and has the status equivalent to a National Park. The Broads has a diverse and unique environment. No maps in the documentation show where the Broads is in relation to the Growth Triangle.
- Evidence: Broads Act 1988.
- Suggested change 1: The Broads, which include areas of international nature conservation importance **and a diverse and unique landscape of national importance**, lie to the north of the Growth Triangle **and also to the south east (near Broadland Business Park).**
- Suggested change 2: please include a map at this section which shows the growth triangle and the Broads.

3.2.4 Section 4.13

- Sound or unsound? Unsound.
- Reason: Justified.
- Comment: Add SPA, SACs and Ramsar Sites to this section.
- Why? These designations are found in the Broads and the issue of pressure from development in the GTAAP is referenced throughout the document. Whilst 4.12 infers these designations, they are not specifically stated. Being so important, it seems logical to state these designations.
- Evidence: JCS HRA and designations and reasons for citation as listed on the Natural England website and through the Nature on the Map website.
- Suggested change: 'In addition, there are a number of sensitive habitats, landscapes and heritage assets across and close to the Growth Triangle. These include **SPAs, SACs, Ramsar sites**, County Wildlife Sites, Ancient Woodlands, Historic Parks and Gardens and Conservation Areas.'

3.2.5 Section 4.14: '...should be offset...'

- Sound of unsound? Unsound.
- Reason: Effective.
- Comment: Should this be '*...will (or even must?) be offset...?*'?
- Why? 'Should' may be interpreted as a weaker term than 'will' or 'must'. Mitigation is quoted throughout the GTAAP and is an important issue, so the document should make it clear how much weight will be attached to this point.
- Evidence: JCS HRA, GTAAP.
- Suggested change: 'Mitigation increased recreational pressure on sensitive Broads habitats should be offset through the provision of large new set piece parks and semi-natural open spaces coupled with improved walking and cycling links to these facilities.'

3.2.6 Page 21. Environment objectives

- Sound or unsound? Unsound.
- Reason: Effective.
- Comment: The Broads is mentioned in 6.8 but not in objective 7. The wording relating to the Broads in 6.8 seems to belong within the objective itself.
- Why? The objectives have changed from the Issues and Options. Issues and Options version referred to areas surrounding the Growth Triangle and thus inferred the Broads (although did not specify). The new objectives do not refer or even infer to the Broads. With the issue of recreational pressure on the designated habitats within the Broads, it seems pertinent that there is an objective of the GTAAP along these lines. Therefore improving Objective 7 seems logical.
- Evidence: JCS HRA.
- Suggested change: '7. Set out policy requirements to enable the delivery of effective multi-functional green infrastructure corridors across the

Growth Triangle and identify appropriate locations for new country parks that offer restored parkland and woodland and acid grassland heath, with public access. **Together, this Green Infrastructure will offset any recreational pressure on sensitive habitats such as those in the Broads.'**

3.2.7 A number of the policies are worded similar to that shown below:

> NO DEVELOPMENT WILL BE PERMITTED UNTIL A PHASING PLAN INDICATING THE ORDERLY SEQUENCE OF DEVELOPMENT HAS BEEN APPROVED. THIS WILL NEED TO SHOW BROADLY HOW THE INFRASTRUCTURE AND SERVICES ARE TO BE COORDINATED WITH DEVELOPMENT.

- Sound or unsound? Unsound.
- Reason: Effective.
- Comment: For the avoidance of doubt, it should be made clear that 'infrastructure' also includes Green Infrastructure. GI is a significant issue for the GTAAP (as a way of mitigating recreational pressure on the Broads), Why? Delivery of the GI is important and this criteria of the policies is logical and welcomed, but clarification that this criteria refers to GI is important to the Broads.
- Evidence: JCS HRA.
- Suggested change: 'THIS WILL NEED TO SHOW BROADLY HOW THE INFRASTRUCTURE **(INCLUDING GREEN INFRASTRUCTURE)** AND SERVICES ARE TO BE COORDINATED WITH DEVELOPMENT.'

3.2.8 **Policy GT2.**

- Sound or unsound? Unsound
- Reason: Justified.
- Comment: There does not currently appear to be enough detail of these parks including how they will be designed, developed and agreed? Details of accessibility including walking routes, cycling routes, bus stops probably need to be included at this stage? It should be made clear whether the parks quoted in paragraph 4 of the policy are envisaged to be Suitable Alternative Natural Greenspace (SANGs)?
- Why? Delivery of the GI is important and quoted throughout the GTAAP, but there does not seem to be detail nor indication of how the details Evidence: JCS HRA.
- Suggested change: Because GI is fundamental to the GTAAP, it is suggested that greater clarification of the function and delivery of these areas of open space be provided. If relevant, reference to the GI and appropriate lighting/dark skies should be addressed.

Linked to the comment on GT2 is the comment on GT16 that follows.

3.2.9 **Policy GT16. Page 61. 30Ha public open space bullet point.**

- Sound or unsound? Unsound.
- Reason: Justified.

- Comment: It is understood that the purpose of this area is to act as a buffer to the Broads. This bullet point requires expanding to specifically state the purpose as well as give further criteria. For example, it is not clear how this area will actually attract or provide for wildlife or attract or provide for people. The HRA for the JCS¹ completed by Mott Macdonald states that an 'ecological buffer zone' is needed. At page 79 of the submission GTAAP, it is described as a 'public park'. The HRA for the GTAAP says this area of land is 'public open space'. Is this area to be a SANG? - Clarification as to its purpose is required.
- <http://www.naturalengland.org.uk/ourwork/planningdevelopment/bytheway/developmentfeature.aspx> is a useful case study and going by this it seems that the buffer/park/zone intends to fulfil the requirements that this particular case study does.
- Why? The fact that this buffer zone and the other parks are required for mitigating the recreational impacts of the development is clear. But the actual described function of the three parks, especially the buffer zone is not clear. As this was a requirement of the JCS HRA, it seems prudent to provide more detail – effectively the issue was deferred to the GTAAP it seems, but currently it is not clear if the policy in the GTAAP is detailed enough. There are already examples in Broadland of agreement and delivery of parks meeting clear objectives (e.g. Beyond Green and the management of Beeston Park).
- Evidence: JCS HRA, GTAAP, Natural England website (SANGS).
- Suggested change: text relating to the function of the open space as well as details on its planning and delivery seems logical in the policy itself.

3.2.10 Page 83 and Policy GT16

- Sound or unsound? Unsound.
- Reason: Justified.
- Comment: Re GT16, it is noted at page 83 that the buffer zone will be delivered two years after development on GT16 commences. This timing is welcomed as it will be an attraction (subject to clarification sought above) from the time the vast majority of the residents of the 3,000 dwellings move in. But it seems logical that this important date is in the GT16 or GT2 policies themselves. Finally, how will this timescale be enforced?
- Why? To make it clear and explicit when the buffer is to be delivered.
- Evidence: JCS HRA and GTAAP itself.
- Suggested change: the timeline as set out in page 83 is included within the policy text of GT2 and GT16.

3.2.11 Page 79

- Sound or unsound? Neither – clarification sought.

¹ (<http://www.gndp.org.uk/content/wp-content/uploads/downloads/2013/02/SDJCS10.1-HRA-Supplementary-Statement-and-Report-v1.pdf>).

- Question: It is noted that there is no progress and there are no comments relating to buffer/zone/park to the north of Rackheath. Why is this?

3.2.12 Page 83. Policy GT16

- Sound or unsound? Sound.
- The delivery of the buffer two years after development of GT16 commences is supported. This timing is welcomed as it will be an attraction (subject to clarification sought above) from the time the vast majority of the residents of the 3,000 dwellings move in (although see previous comment regarding having this time frame in the policy itself).

3.3 Maps

3.3.1 A0 Map, Map 3 and Map 6.

- Sound or unsound? Unsound.
- Reason: Effective
- Comment: Need to show the Broads and be at a suitable scale to show where the Broads are (to the south east and north east of the triangle).
- Why? The omission of the Broads could be misleading. The Broads is quoted throughout the document, HRA, and SA so showing its spatial relation to the growth triangle seems logical. It is also an area renowned nationally for its landscape and has the status equivalent to a National Park. The Broads has a diverse and unique environment.
- Evidence: Broads Act 1988.
- Suggested change: alter scale of maps and shade the Broads Executive Area so as to give context of the Growth Triangle.

3.4 Delivering the GTAAP

3.4.1 We strongly recommend and indeed request that the Broads Authority's specialist advice and expertise should be involved in shaping the delivery of the GTAAP. The Authority will be consulted on future relevant planning applications. However, it is considered that the significance of the proposed development warrants greater Broads Authority involvement and officers would wish to be involved in any panels/thematic groups/workshops or boards set up to help assess planning applications or shape the details of Green Infrastructure.

3.4.2 It is evident throughout the GTAAP and JCS HRA that impact on the Broads is a fundamental issue to the delivery of the GTAAP's ambitions. The Broads Authority has in house specialists and experts who can provide local expertise and should be involved in determining and shaping plans.

3.4.3 Please note that at the GNDP Planning Officers Group meeting held on 19 August, it was suggested that the Broads Authority be involved in the Green Infrastructure Governance for delivering the JCS ambitions.

4 Financial Implications

- Development Management Officers will be consulted on relevant planning applications.
- This response proposes that BA Officers are involved in shaping Green Infrastructure (GI) proposals.

5 Conclusion

5.1 Whilst the principle of development is accepted and promoted through the adopted Joint Core Strategy, the detail is to be worked out through the Growth Triangle Area Action Plan.

5.2 The potential for impact on the designated sites of the Broads is acknowledged in the JCS HRA and the GTAAP seeks to address this by addressing GI in terms of corridors and large areas of open space. This is welcomed.

5.3 However, the proposed comments seek:

- Greater appreciation of the Broads and its landscape in the text and on maps.
- Greater detail with regards to Green Infrastructure detail and delivery.
- An additional Green Infrastructure corridor towards the River Yare.

Background papers: None

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Appendices: Appendix A: Policies Map. <http://www.broads-authority.gov.uk/broads-authority/committees/planning-committee/planning-committee-12-september-2014>