

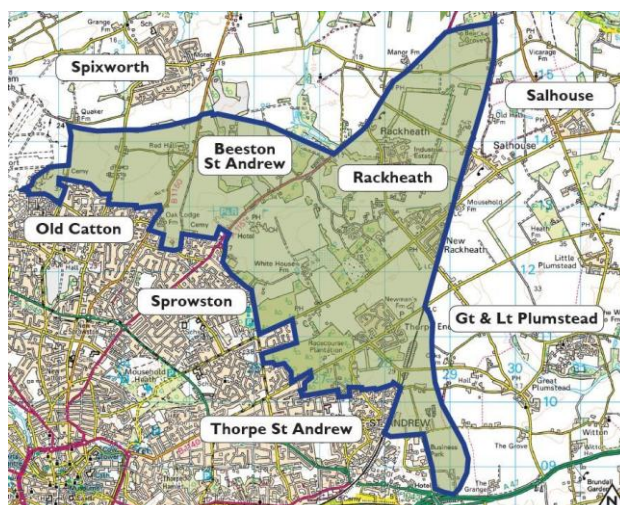
Consultation Document and Proposed Responses
Neighbouring Council Consultation: Broadland District Council
Growth Triangle Area Action Plan Issues and Options
Report by Planning Policy Officer

Summary: The report briefly summarises the Growth Triangle Area Action Plan (GTAAP) and proposes a response to Broadland District Council from the Broads Authority.

Recommendation: That the proposed response be endorsed and submitted to Broadland District Council as the Broads Authority's formal response.

1 Introduction

- 1.1 From time to time, the Broads Authority is consulted on neighbouring Council's planning policy documents. It is important that the Broads Authority takes this opportunity to assess the documents and, as appropriate, provide the relevant Council with a representation detailing the Broads Authority's views on the proposals.
- 1.2 This report seeks to summarise the Growth Triangle Area Action Plan (GTAAP) which is being produced by Broadland District Council and proposes a response from the Broads Authority. The policies in the Plan will eventually help determine planning applications in the Growth Triangle area.
- 1.3 The GTAAP covers the area as show in the following map – i.e., the policies will apply to the area in the triangle only. The consultation ends at 5pm on 10 June 2013.



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2 The GTAAP and the Joint Core Strategy (JCS)

- 2.1 Members will recall that the JCS was adopted in March 2011, but subsequently challenged at the High Court. This challenge resulted in the part of the JCS relating to the Growth Triangle area being remitted – returned to a draft stage. Broadland District Council has since undertaken further work and has concluded that the approach as included in the JCS remains the most appropriate when considered against other reasonable alternatives. The Inspector will examine the Plan in May 2013 to determine if the approach is sound.
- 2.2 Broadland District Council is therefore continuing planning for the Growth Triangle, reflecting the approach as included in the re-submitted section of the JCS. The GTAAP therefore relies on the relevant part of the JCS being found sound and adopted as planning policy.
- 2.3 To summarise, whilst the principle of growth in this area is yet to be found sound, it is the GNDP's intent to continue with the area being allocated for growth. An examination into the JCS and the Growth Triangle is scheduled for 22 and 23 May 2013.

3 Why Growth in This Area?

- 3.1 The justification for growth in this area is:
- (i) close to Broadland Business Park, Norwich Airport and local employment in Rackheath and Sprowston;
 - (ii) well related to the city centre and other parts of Norwich;
 - (iii) easy access to the proposed Northern Distributor Road;
 - (iv) ability to provide enhances bus and rail services;
 - (v) opportunities to create new open space for recreation as well as habitat corridors;
 - (vi) mostly avoids high quality agricultural land; and
 - (vii) sewerage can be disposed of through an additional connection to Whitlingham Sewerage Treatment Works.

4 A Summary of the GTAAP

- 4.1 The GTAAP is at its early stages of production: Issues and Options. The plan highlights some issues it seeks to tackle and suggests some options for consideration. In this version of the GTAAP, draft policies have been formulated, with alternative approaches suggested.
- 4.2 Headlines (i.e. what the GTAAP seeks to plan for) are as follows:
- (i) The Plan covers a 15 year period.
 - (ii) The Growth Triangle covers an area of approximately 1865 hectares.
 - (iii) The GTAAP seeks to deliver a minimum of 7,000 additional new homes in the Growth Triangle by 2026, rising to at least 10,000 thereafter.

- (iv) 33% of these new dwellings will need to be “affordable”.
- (v) 25Ha extension of Rackheath Industrial Area.
- (vi) 25Ha extension to Broadland Business Park.

4.3 Policies cover the following themes:

- (i) Sustainable Development: highlights key elements development in the area should address.
- (ii) Housing: lists principles new housing should address.
- (iii) Economic Development: requires the production of an Economic and Retail Strategy.
- (iv) Design: requires development to be designed to high standards and requires a Masterplan to be produced.
- (v) Green Infrastructure: require the provision of a network of green spaces and also states Green Infrastructure that should be retained.
- (vi) Recreational Open Space: sports pitches, children’s play areas, allotments and informal open space.
- (vii) Strategic Transport Requirements: includes the NDR, Postwick interchange, cycling and public transport networks and bus rapid transit.
- (viii) Transport Principles: key transport related infrastructure elements.
- (ix) Strategic Requirement: a summary policy of infrastructure such as schools and green spaces.

4.4 The plan has area based policies which address the distribution of development and which cover three sectors. There are also policies related to the sectors which guide the issues the masterplan need to address. The sectors and land uses are shown over page.

5 The GTAAP and the Impact on the Broads

- 5.1 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’.
- 5.2 Whilst the area of the GTAAP does not include any of the Broads Authority Executive Area, the proposals are considered not to have any direct effects on the Broads, the indirect effects are important to understand.
- 5.3 Assuming an average of 2.2 people per household, over 20,000 people will live in the area (by 2026). 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.

6 Issues to Raise in Response to Consultation.

- 6.1 Whilst it is recognised that promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public is the second of

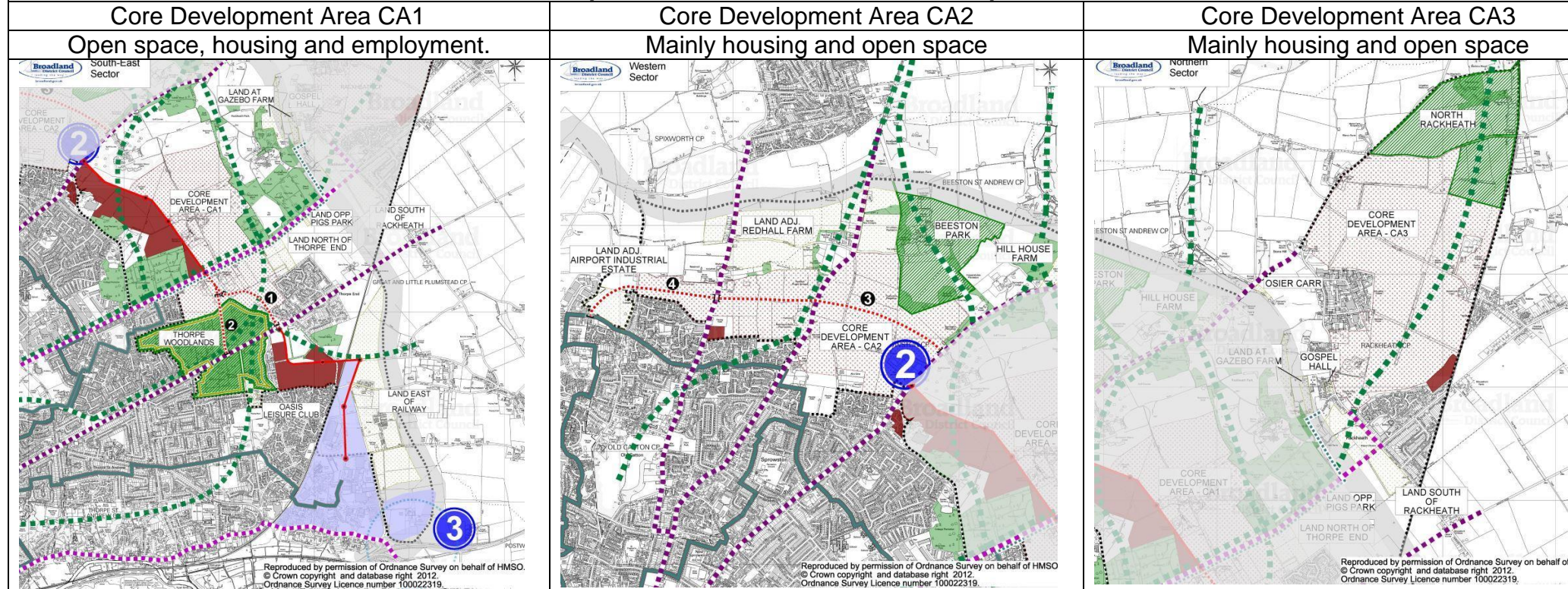
the statutory purposes, an increased population in this area will create increased pressures on the systems and the Habitats Regulation Assessment for the JCS (which allocates this area of land for growth and change in the first instance) does raise the recreational impact of the growth in the Growth Triangle as an issue that needs addressing. The GTAAP does include areas of open space to act as mitigation for the impact of the development on the Broads. North Rackheath is one area and to a certain extent, Beeston Park is another.

- 6.2 Whilst the recognition of the issue in principle is welcomed, there are significant concerns as to how mitigation will be delivered because, whilst it is mentioned in the GTAAP and area is set aside as open space, it seems that the function of North Rackheath (be it for recreation or an ecological buffer) is not clear and there are no firm plans for this mitigation (in terms of management, timing of provision and what will be provided). This concern forms the main area of the proposed representation. It is suggested that further work could be completed before the next iteration of the GTAAP and perhaps some detail from that work be enshrined in policy. Alternatively, the requirement for detailed work to be completed could be a requirement of policy in a similar way to other policies in the document (such as the requirement for a masterplan or economic strategy).
- 6.3 Broads Authority representatives attended a GI workshop on 9 May 2013 regarding Green Infrastructure and members will be updated verbally of the outcome of this.
- 6.4 In addition to the concerns about mitigation, it is also noted that drainage would be into sensitive river corridors of the Bure and the wider Broads, so water quality would need to be carefully managed. Policies should address SuDS and water efficiency mentioned as well as protect the sensitive river corridors.
- 6.5 There are also some more detailed and specific comments that are suggested:
- (i) 2.0.23, 7.3.35, 7.4.24. Reference should be made to The Broads rather than the Norfolk Broads.
 - (ii) On the maps, the shades of green are fairly similar and it is not easy to ascertain what each green is and what it means when looking at the legend.
 - (iii) Map on page 36 – what is exactly meant by GI Links? Walking and cycling links? Habitat connectivity? Are they the same as **Local Green Infrastructure Corridors** which are referred to in the GNDP GI Strategy?
 - (iv) Regarding the policy on page 38, could this conflict with other parts of the document? The second part of the policy seems, as worded, to relate to the potential for loss of GI (*'...should be retained unless it is clearly demonstrable that the benefits of development outweigh the loss of the asset'*). Whereas elsewhere in the AAP some of the assets

listed in the bullets are afforded protection (e.g. policy on page 41, section 6.6.17, policy on page 85 and 7.3.35).

- (v) The policy on page 57 seems to repeat other individual policies. Query position in document and need.
- (vi) Request that maps show the Broads Executive Area.

Maps associated with the area based policies.



Key

Boundaries

Extent of Growth Triangle

Potential development areas

Potential Core Development Area

Option Area

Options for development or open space

Existing and permitted employment areas

Sites with existing (or a resolution to grant) planning permission

Green areas/links

Potential public open space

Proposed Green Infrastructure Priority Link

Tree belts, hedgerows, woodland

Transport

Protected corridor for NDR route

Permitted link road

Proposed orbital link options

Future Bus Rapid Transport route

Core bus routes

Cycle network

Proposed cycle network extension

Park & Ride facilities (existing & proposed)

Junction capacity improvements

Indicates Transport Infrastructure Option

DO NOT SCALE

7 Links of relevance:

- 7.1 The summary leaflet (4 pages) can be found here:
http://www.broadland.gov.uk/PDF/The_Growth_Triangle-summary_leaflet.pdf
- 7.2 The main document (106 pages) can be found here:
http://www.broadland.gov.uk/PDF/Growth_Triangle_AAP_Options-Consultation_Document.pdf

8 Financial Implications

- 8.1 The response itself has not financial implications. It is likely that Officers of the Broads Authority will be involved in determining the detail of the mitigation however. There could also be an element of delivering the mitigation, but this is likely to be funded by developers and is uncertain at this stage.

9 Conclusion

- 9.1 There is no direct impact of the growth proposals on the Broads. There will be an element of indirect effects; namely recreational impact of the new residents. Mitigation for this is presented as an open area, mainly at North Rackheath, but the area's function is not clear. Detailed plans relating to the form North Rackheath will take and its management are not included in this version of the GTAAP.

Background papers: None

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Appendices: None