

## Local Plan for the Broads Broads Authority response to Matter 6 – Infrastructure delivery June 2018

## *Issue – Does the Plan set out a robust framework for infrastructure delivery which is justified, effective and consistent with national policy?*

## [Chapter 30 – Planning obligations: Policy PUBDM46]

## Questions

- a) Does the Local Infrastructure Report (2016) (EB19) provide a thorough assessment of infrastructure needs, and reflect levels of growth in the Local Plan?
  - *i.* EB19 is a proportionate response to the level of growth proposed. See answer to question 15a and b in EPS1.
- b) What transport modelling work has been undertaken for the Broads area?
  - *i.* No transport modelling work has been undertaken for the Broads area which is a proportionate approach for the area. This is justified because of the level of growth in the Local Plan which does not impact significantly on the transport infrastructure. At no stage of the Local Plan production have either Norfolk or Suffolk County Councils, in their capacity as Local Highways Authorities for the area, required traffic modelling to be completed to assess the growth set out in the Local Plan for the Broads. Indeed, Suffolk County Council say in their representation (95, page 52 of LP-PUB4) 'The scale of growth coming forward in this plan is such that it would be disproportionate to require a new assessment (at local plan level) of cumulative transport impacts in order to ensure soundness as it will be assessed at the planning application stage'.
- c) What technical work is being undertaken to investigate flow/capacity issues at the Horning Knackers Wood Water Recycling Centre? Is a programme of works scheduled, and are capacity issues likely to be resolved within the Plan period? What are the implications for site-specific allocations in this area?
  - *i.* Anglian Water Services have completed some initial works in the Horning sewerage catchment and further CCTV surveys are on-going. Subject to the outcome of these surveys they will undertake any repairs which are required to mitigate surface water ingress where it interacts with the foul sewerage system in Anglian Water's ownership.
  - *ii.* The proposed additional site for residential moorings at Ropes Hill, Horning is the only site allocation for new development in that area and

the capacity issues are set out in that draft policy (proposed change 1 of LP-SUB2). The policy and trajectory show that this allocation will come forward later in the plan period when it is envisaged that the capacity issue will be addressed.

- iii. Other site specific policies in Horning may result in increased foul water flows and this issue is covered in PUBDM1 and the introduction to the Horning section at 32.14 page 153. Surface water runoff is one of the issues that contribute to the capacity issues at the Water Recycling Centre and this is included in most policies in the Horning section.
- *iv.* The Authority is aware that Anglian Water Services have submitted a statement relating to this question. The Authority understands that currently there is no capacity, but AWS consider that as there are 18 years left in the plan period and investigatory works are ongoing, there could be capacity later in the plan period.
- d) Is the approach to developer contributions, as set out in Policy PUBDM46, effective and soundly based?
  - *i.* Comments have been received on this policy from Suffolk County Council, the Home Builders" Federation and Great Yarmouth and Waveney CCG (see Pub-LP4, page 75, 76, 77). In response it is proposed to make change 74 of LP-SUB2. Apart from this change, the policy is effective and soundly based.
- e) Does the Authority's evidence demonstrate that the scale of developer contributions and policy burdens will not render development unviable?
  - *i.* Yes. The Viability Study (EB43) did not consider that policy burdens will make schemes unviable. The Study is based on the Harman Guidance and no negative comments have been made on the Study.