

Greater Norwich Local Plan Regulation 19 Consultation

Breckland District Council’s Response

Breckland District Council has concerns over the Greater Norwich Local Plan and its growth plans. A large proportion of Breckland District Council’s growth plans are concentrated in the same area of the Norwich – Cambridge Corridor and the Council’s main concerns are the cumulative impact of the growth on infrastructure particularly power which has been identified as a constraint in this area in the Greater Norwich Energy Study April 2019. However, this study has failed to consider the cumulative growth of both Breckland and GNLP growth plans. Sufficient water resources both supply and waste management is also a concern as indicated in the Anglian Water Resources Management Study 2019. The Council does not consider the water efficiency policies proposed are going to adequately address the water requirements to support the growth from both Breckland and the Greater Norwich area. Under the Duty to Cooperate, Breckland District Council would welcome the earliest opportunity to engage with GNLP to explore a joint approach to any constraints which may arise as a result of the cumulative growth in both planned areas.

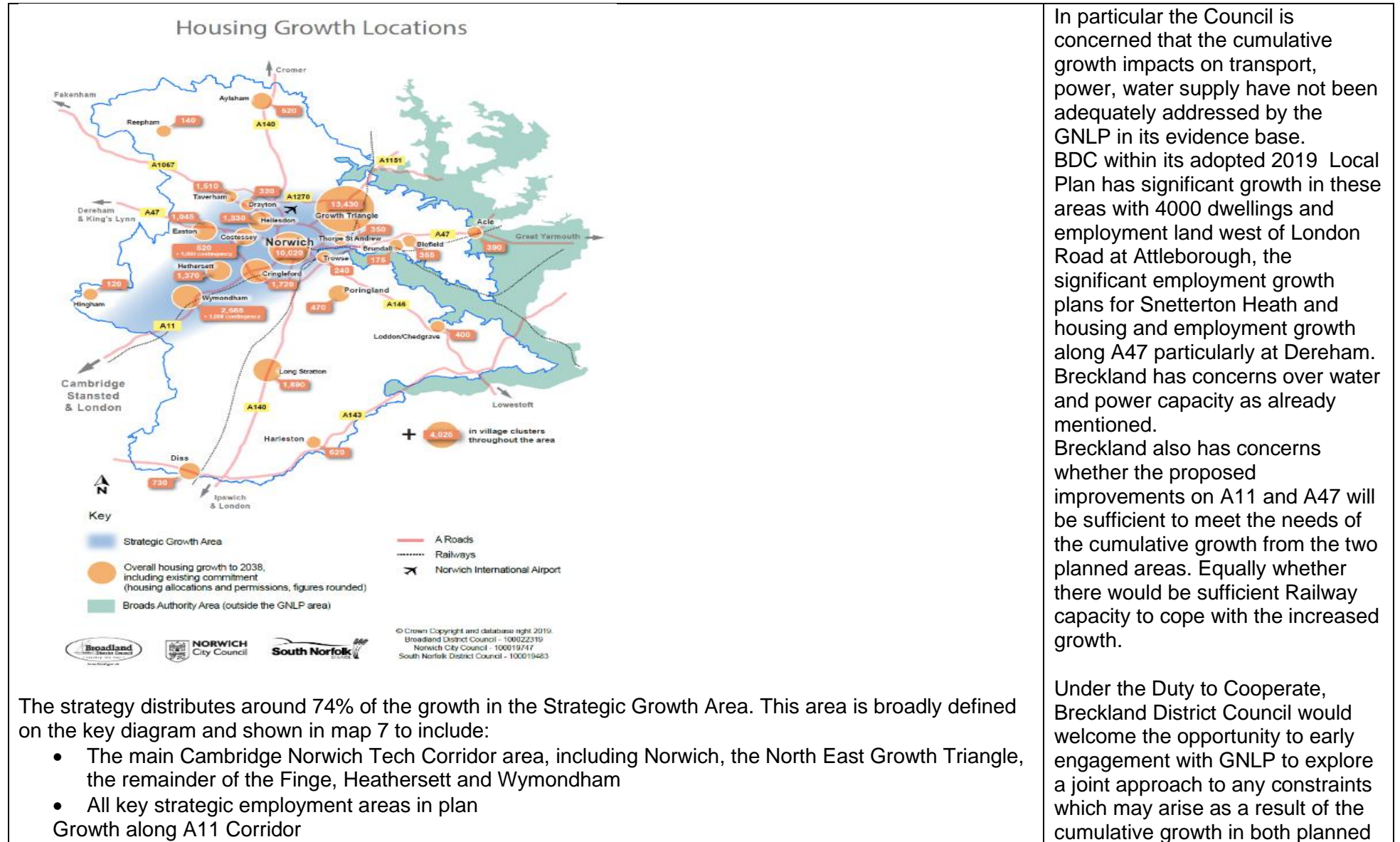
The Council is also particularly interested in any growth aspirations along the A47 at Honingham Thorpe; and A11 at Hethel and Silfield which would further put pressure on infrastructure in the area and under the Duty to Cooperate, Breckland District Council would welcome the earliest opportunity to engage with GNLP to explore the location and impact of any proposals in the Honingham Thorpe, Hethel and Silfield area on infrastructure including power and water as well as the impact on Breckland’s communities living nearby and to work jointly to minimise any adverse effects which may arise as a result.

Reference & Description	Response
<i>What is a local Plan? How the GNLP fits in with other planning bodies and strategies?</i>	BDC is interested in how the GNLP considered Breckland’s growth as identified in Breckland’s adopted 2019 Local Plan?
Paragraph 32 <i>“South Norfolk District Council is at an advanced stage with its Village Clusters Housing Allocations Local Plan. The Regulation 18 preferred options consultation is anticipated in Spring 2021. There is an aspiration</i>	Breckland District Council is interested in the location of these additional 1200 homes, and

<p><i>for every village cluster to have new housing sites allocated, with a focus on smaller sites, and to be in accordance with the overarching GNLP strategy which identifies sites for a minimum of 1200 additional homes on top of the existing commitment of 1,392 homes. Therefore, it is not one of the objectives of the GNLP to identify the village clusters in South Norfolk and consequential housing allocation sites in these areas”</i></p>	<p>whether they too will be allocated between A47 and A11. An additional 1200 homes, along with existing allocations at Easton and Wymondham plus Breckland's growth plans will put further pressure on infrastructure of power and water</p>
<p>Evidence Document Greater Norwich Local Plan New Settlements Topic Paper Reg 18 Consultation Jan to March 2018 4s. <i>Two new settlement scale locations have been submitted through the Call for Sites for consideration for inclusion in the GNLP. There are proposals around Honingham Thorpe to the west of Norwich and on land between Wymondham and Hethel. These sites are included in the Reg 18 GNLP public consultation</i></p>	<p>These sites are indicated on the GNLP Growth Strategy map but are marked as not allocated. It is not clear whether these sites are the ones under consideration as new settlements to be brought forward in the next Local Plan</p>
<p>The Economy Paragraph 64 <i>Strategic employment sites and competitive land and business lets, mainly those in and around the Norwich and Wymondham area support the globally significant growth axis within the Cambridge Norwich Tech Corridor (refers to map)</i></p>	<p>BDC is interested in the synergies considered in the Economic growth aspirations of GNLP with those employment sites and strategies in Breckland which are also along A11 and A47</p>
<p>Water Resources Management Plan 2019 Water Stressed Areas Final Classification Environment Agency 2013 Paragraph 121 <i>Baseline for Norfolk Rural area is Red/Serious with baseline supply -demand balance in 2044 2045 as <-15 Page 6 Area along A47 and A11 are considered serious and moderate Fig 2 page 8 Relatively low rainfall totals and extensive agricultural water use demand mean that the whole area is defined as suffering from serious water stress. Local Planning policy and water company strategy place focus on promoting water efficiency</i></p>	<p>BDC are interested what criteria was considered for water efficiency policies to be considered sufficient to cope with the cumulative growth of not just the GNLP but also the growth aspirations of Breckland. The modelling shows the impact of GNLP growth on water resources. Was any modelling done on the cumulative impact of growth from both the GNLP and Breckland on water resources?</p>

<p>Paragraph 92 Digital Infrastructure <i>“It aims to make high speed broadband available to more than 95% of Norfolk’s premises. The next generation of mobile phone networks is 5G and the rollout commences from 2020.”</i></p>	<p>Is this roll out to rural areas as well?</p>
<p>Paragraph 128 Strategy The vision and Objectives for Greater Norwich Economy <i>...”significant growth in digital creative industries in the city centre and in Health, Life Sciences, agri and bio technology at the Norwich Research Park and the Food Enterprise Park at Honingham, along with advanced manufacturing and engineering at Hethel”</i></p>	<p>Have any synergies been considered with Snetterton Heath business park with businesses in green energy technology, transport & warehousing, digital industries?</p>
<p>Paragraph 135 <i>“We plan to concentrate the building of new homes in and around Norwich and in the Cambridge Tech Corridor”</i></p>	<p>Breckland is also concentrating its housing in this area.</p>
<p>Paragraph 141 <i>“Electric vehicles will predominate throughout Greater Norwich and connected and autonomous vehicles (CAVs) will become more common place initially with taxis and shared demand responsive buses and ultimately for buses, deliveries and private vehicles”</i></p>	<p>How far has this vision been scoped out with neighbouring local authorities?</p>
<p>Delivery Paragraph 153 <i>“ GNLP is part of a wider package of joined up measures the councils are taking to work with the Government, New Anglia LEP, the development industry and service and infrastructure providers to fund and delivery the high-quality growth Greater Norwich needs”</i></p>	<p>What joined up measures were considered with those district councils on its borders where the intended growth is to occur?</p>
<p>Paragraph 155 Delivery Housing <i>There are enough committed sites to accommodate 22% more homes than “need” Contingency location of growth should they be required to offset non delivery</i></p>	<p>Where will this additional 22% be allocated within the local plan?</p>
<p>Strategic Growth Area- Satellite map with allocations</p>	<p>These following sites have been highlighted but not allocated, are these sites the ones proposed in Policy 7.6 e.g. GNLP0415/DR at Honingham (Honingham new settlement) GNLP4057A, GNLP1055R, GNLP4057C along A11 at Wymondham, Hethel, Spooner Row</p>
<p>Paragraph 165</p>	<p>We note these proposals are close to Breckland borders and have</p>

<p><i>This local plan also provides a “direction of travel” for the longer term by identifying opportunities for growth which could be taken forward to meet additional needs in the next local plan. A significant part of this long-term need is likely to be met in a future plan through the development of new settlements (see policy 7.6)</i></p>	<p>concerns over the impact on infrastructure and nearby communities and would welcome early discussions if and when these progress</p>
<p>Paragraph 170 <i>This plan therefore allocates employment sites totalling around 360 hectares including key strategic employment land Wymondham/Hethel, Longwater and the Food Enterprise Park.</i></p>	<p>Breckland also has substantial employment land allocated in this area and have concerns on the impact of cumulative growth on infrastructure</p>
<p>Table 6 Establishing the Plan’s total housing potential figure <i>...”. This provides a buffer of 22% to cater for the potential for higher growth rates.”</i></p>	<p>What modelling has been done of the cumulative growth aspirations of both Breckland and GNLP to support 22% additional growth</p>
<p>Paragraph 180 <i>1200 homes to be delivered by the South Norfolk Village Clusters Housing Sites Allocation Plan</i></p>	<p>This has not been submitted with the GNLP but Breckland would like clarification on where the focus of this growth would be. Cumulative growth along the A11 and A47 would put further pressures on infrastructure.</p>
<p>Paragraph 187. <i>A significant element of any further growth required in the next plan under the new planning system will be at a new settlement or settlements (see Policy 7.6)</i></p>	<p>Breckland has concerns over the location and size of this growth which is close to its borders and would impact on its own growth plans in the area and would welcome further information on the progress on these settlements</p>
<p>The Growth Strategy paragraph 188 c <i>Focusses most of the growth in locations with the best access to jobs, services and existing and planned infrastructure in and around the Norwich urban area and the Cambridge Norwich Tech Corridor</i></p>	<p>Further focus on growth area which is also growth area for Breckland</p>
<p>The Strategic Growth Area paragraph 193</p>	<p>Breckland seeks confirmation that the proposed growth from GNLP will not be at the detriment to the growth planned within Breckland.</p>



In particular the Council is concerned that the cumulative growth impacts on transport, power, water supply have not been adequately addressed by the GNLP in its evidence base. BDC within its adopted 2019 Local Plan has significant growth in these areas with 4000 dwellings and employment land west of London Road at Attleborough, the significant employment growth plans for Snetterton Heath and housing and employment growth along A47 particularly at Dereham. Breckland has concerns over water and power capacity as already mentioned.

Breckland also has concerns whether the proposed improvements on A11 and A47 will be sufficient to meet the needs of the cumulative growth from the two planned areas. Equally whether there would be sufficient Railway capacity to cope with the increased growth.

Under the Duty to Cooperate, Breckland District Council would welcome the opportunity to early engagement with GNLP to explore a joint approach to any constraints which may arise as a result of the cumulative growth in both planned

The strategy distributes around 74% of the growth in the Strategic Growth Area. This area is broadly defined on the key diagram and shown in map 7 to include:

- The main Cambridge Norwich Tech Corridor area, including Norwich, the North East Growth Triangle, the remainder of the Finge, Heathersett and Wymondham
- All key strategic employment areas in plan
Growth along A11 Corridor

<ul style="list-style-type: none"> • Cringleford 1770 • Wymondham 2,615 • Hethersett 1375 • South Norfolk Village Clusters? <p>Employment</p> <ul style="list-style-type: none"> • Hethel • Wymondham <p>Growth along A47</p> <ul style="list-style-type: none"> • Easton • Costessy 530 + 200 contingency <p>Employment</p> <ul style="list-style-type: none"> • Longwater business park • Food Enterprise park at Easton/Honingham 	<p>areas. This need for cooperation cannot be addressed via the NSPF</p> <p>Summary of Breckland’s Growth is around the A47 and A11</p> <p>Breckland Growth along A11 in planned period</p> <p>Attleborough 4383</p> <p>Great Ellingham 195</p> <p>Thetford 3666</p> <p>Harling 250</p> <p>Employment growth at Attleborough and Snetterton</p> <p>Employment Growth at Thetford</p> <p>Breckland Growth along A47</p> <p>Dereham 1784</p> <p>Swaffham 1553</p> <p>Necton 283</p> <p>Swanton Morley 184</p>
<p>Table 7 Housing Growth 2018 to 2038 Norwich Urban Fringe, which includes Norwich, Colney, Costessey, Cringleford, Drayton, Easton, Hellesdon, Old Catton, Sprowston, Taverham, Thorpe St Andrew, Trowse and the remainder of the Growth Triangle.</p> <p>Total 138,791 a 31% increase</p>	<p>Concerns about the Impact of cumulative growth</p>
<p>Policy 1 Sustainable Growth Strategy</p> <p><i>Infrastructure: The sustainable growth strategy will be supported by improvements to the transport system, green infrastructure and services</i></p>	<p>The significant cumulative growth from both GNLP and Breckland LP will require significant infrastructure planning to support both growth strategies</p>
<p>Policy 2 Sustainable Communities Table 8 Key Issues</p> <p><i>2: New Technologies – policy provides basis for SPD to support new technologies including ... the use of electric vehicles.</i></p>	<p>Breckland would welcome discussion on the support of electric vehicles within the county but this would be a further pressure on the already constrained power</p>

	<p>network and would have to be carefully planned with neighbouring authorities.</p>
<p>Policy 2 9. Water <i>The Environment Agency (EA) has identified Greater Norwich as water stressed in its “Water Stress Area Final Classification (2019), the primary source of evidence which supports a tighter water efficiency standard. Anglian Water’s strategic approach to providing water supplies to meet growth needs includes a major focus on water efficiency measures</i></p>	<p>Will policies on water efficiency be sufficient to cope with the cumulative growth of both GNLP and Breckland? What modelling has been done to look at cumulative growth impacts?</p>
<p>Policy 2 10 Energy <i>... policy requires development to be designed and orientated to minimise energy use....It also supports decarbonised energy supplies locally by promoting measures such as decentralised, renewable and low carbon energy generation, co-locating potential heat customer and suppliers, and battery storage, as well as energy efficiency in new developments. Evidence shows that a positive approach to promoting energy efficiency and locally generated sustainable sources of energy, as well as promotion of the use of battery storage, is required to address local energy network capacity constraints and to ensure the timely delivery of growth.</i></p>	<p>Will this be sufficient to deal with the already highlighted energy capacity problems when border district growth is taken into account?</p> <p>The Greater Norwich Energy Infrastructure Study May 2019 did not consider neighbouring Breckland District’s power needs for the growth already in progress at Attleborough and Snetterton Heath or at Dereham within the scope of its study</p>
<p>Greater Norwich Energy Infrastructure Study 28th May 2019</p>	<p>The map shows the planned growth for GNLP but it does not show the growth from Breckland LP, this cumulative growth will impact the energy capacity.</p>

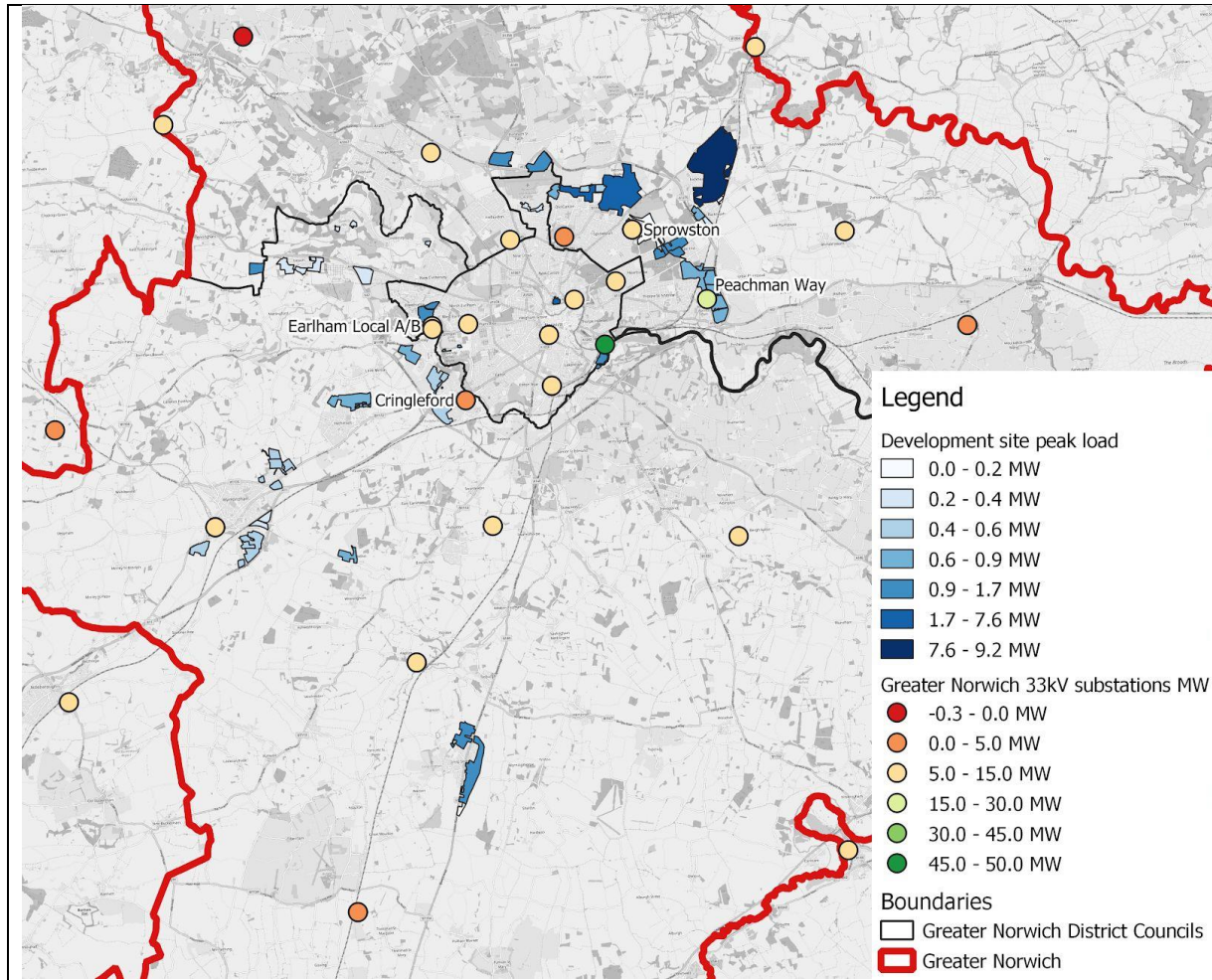


Fig 1: Planned Development sites and existing substation spare capacity within Greater Norwich

The Energy Study concludes “Where cumulative required capacity from new development sites exceeds existing available capacity then not all of the planned development will be able to proceed without potential costly and time consuming reinforcement works”

The study has only considered the growth planned under the GNLP- what will be the impact if you include the growth planned under the Breckland LP? Attleborough, Snetterton Heath, Dereham etc

<p>Paragraph 251 The Water Resources Management Plan (WRMP) does not require additional spending on water supply infrastructure to serve growth in Greater Norwich.</p>	<p>Does the non-requirement of additional water supply still hold when taking the Breckland Growth Plans into consideration as well?</p>
<p>Policy 4 Strategic Infrastructure The Greater Norwich Local Authorities and partners including utility companies will work together in relation to the timely delivery of improvements to infrastructure, including that set out in appendix 1 and to The energy supply network including increased capacity at primary substations at Cringleford, Peachman Way, Sprowston and Earlham Grid Local and/or innovative smart solutions to off-set the need for reinforcement</p>	<p>Would these improvements to infrastructure have a bearing on Breckland's growth plans?</p>
<p>Policy 6 The Economy Key Strategic employment areas Wymondham (Browick Interchange) 22ha Longwater 12 ha Hethel 20.8 ha Food Enterprise park Eaton/Honingham 18.7ha</p>	<p>Concerns over impact of cumulative growth</p>
<p>Policy 7 paragraph 340 As set out in policy 6, strategic employment growth will be in accessible locations at Norwich Research Park, Easton/Honingham, Longwater and the Growth Triangle. Growth at these employment locations will provide sites for both knowledge intensive industries, particularly on exiting and newly allocated sites at Norwich Research Park, and for building a broad-based economy. Development at Norwich Research Park and Easton and Honingham will address transport and infrastructure impacts to mitigate constraints of the proposed developments on the existing highway infrastructure</p>	<p>Concerns over impact of cumulative growth</p>
<p>Policy 7.4 Village clusters paragraph 382 a separate South Norfolk Village Clusters Housing Site Allocations Local Plan is being produced. This plan will include sites for a minim of 1200 homes in addition to the 1392 already committed in the village clusters to be identified in South Norfolk</p>	<p>Concerns over impact of cumulative growth</p>

<p><i>Policy 7.6 Preparing for new settlements Paragraph 395 ... no new settlement is proposed for allocation in this Local Plan, However, with sustainable options for settlement extensions diminishing the authorities are convinced that one or more new settlements will be required in the longer term, particular if housing needs rise as signalled by government.</i></p> <p><i>Paragraph 397 While the intention is to allocate new settlement development through the next plan, delivery will commence prior to the end date of this local plan.</i></p> <p><i>Paragraph 400 Three new settlement sties have been proposed through the GNLP (at Honingham Thorpe, Hethel and Silfield.) These will be investigated along with other potential locations in the next plan, taking account of the selected criteria. In order to shorten the lead in time for delivery and provide the level of certainty for investment that would allow one or more schemes to be incorporated in the new plan, comprehensive analysis of options will begin in 2021</i></p> <p><i>Paragraph 401 The timetable for this work, which provides a broad indication of the authorities' intentions and may be varied to take account of changes to the planning system is:</i> <i>2021 developing success criteria, site options assessment including technical consultation.</i> <i>2022 following adoption of the GNLP, public consultation on site options.</i> <i>2022-24 development of New local plan incorporating preferred site(s)</i> <i>2026 onwards- delivery</i></p>	<p>Breckland District Council has strong reservations about the location and impact of these new settlements and the ability of the infrastructure on Breckland's communities in the area, as well as the impact on infrastructure-transport, health, power and water. The Council would welcome early discussions on these settlements under the duty cooperate requirement.</p>
<p><i>Policy 7.6 Preparing for new settlements.</i> <i>Subject to the outcome of evidence, assessment, and appraisal, one or more new settlements will be brought forward in the next local plan</i></p>	<p>As above</p>