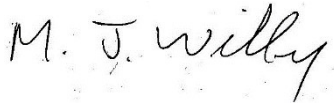


Norfolk County Council

Record of Individual Cabinet Member Decision

Great Yarmouth Local Plan Part 2 – Final Draft Plan Regulation 19 Norfolk County Council Response

Responsible Cabinet Member: Councillor Martin Wilby (Cabinet Member for Highways, Infrastructure and Planning)	
Background and Purpose: To provide the County Council's response to the Great Yarmouth Local Plan Part 2 – Final Draft Plan Regulation 19.	
Decision: To Agree the comments set out in this Report and in the attached Appendix as the County Council's formal response to the Great Yarmouth Local Plan Part 2 (Regulation 19); To Agree that where concerns are raised in this report, these will be taken forward as soundness objections as the County Council considers these matters undermine the effectiveness of the Plan; and To Agree that any further detailed technical comments / representations (e.g. covering highway or drainage matters) be dealt with through delegated officer powers.	
Is it a key decision?	No
Is it subject to call in?	No
If Yes – Deadline for Call in	
Impact of the Decision: See Report section 3 and Appendix attached	
Evidence and reason for the decision: As set out in the attached report section 4	
Alternative options considered and rejected: As set out in the attached report section 5	
Financial, Resource or other implications considered: As set out in the attached report section 6	
Record of any conflict of interest: None	
Background Documents:	

As set out in the attached report	
Date of Decision:	11 April 2020
Publication date of decision:	15 April 2020
Signed by Cabinet member: I confirm that I have made the decision set out above, for the reasons also set out <div style="text-align: center;">  </div> Signed: Print name: Cllr Martin Wilby Date: 11/4/2020	
Accompanying Documents: <ul style="list-style-type: none"> • none 	

Once you have completed your internal department clearance process and obtained agreement of the Cabinet Member, send your completed decision notice together with the report and green form to committees@norfolk.gov.uk

Individual Cabinet Member Decision Report

Decision making report title:	Great Yarmouth Local Plan Part 2 – Final Draft Plan Regulation 19 Norfolk County Council Response
Date	April 2020
Responsible Cabinet Member:	Cllr Martin Wilby (Cabinet Member for Highways, Infrastructure and Transport)
Responsible Director:	Tom McCabe – Executive Director, Community and Environmental Services
Is this a key decision?	No

Introduction from Cabinet Member / Executive Summary

Great Yarmouth Borough Council has published their Local Plan Part 2 under Regulation 19 of the Town and Country Planning (Local Planning) Regulations and is inviting representation on the Plan. This is the final opportunity to comment on the Plan before it is submitted to the Planning Inspectorate and scrutinised through a Public Examination. The County Council's officers and members have been engaged throughout the Local Plan process and have commented and made representations on previous versions of the Local Plan in September 2018 and 2019.

The Local Plan Part 2, is considered consistent with the Great Yarmouth Core Strategy (Local Plan Part 1) adopted in December 2015. The updated housing target in the Local Plan has been reduced from the Core Strategy, reflecting up to date national guidance on calculating local housing need. However, the Borough Council has continued to provide a level of housing through its proposed allocations, which is effectively in line with the adopted Core Strategy and allows for a significant "buffer" (over-provision) of 33%. This buffer is considered appropriate as it is designed to ensure delivery of the housing target.

The proposed response, whilst suggesting largely supporting the Local Plan (Part 2), includes a number of detailed concerns regarding the effective delivery of key infrastructure, including education and highway provision, on the proposed housing allocations. There are also detailed concerns the County Council is raising as Minerals and Waste Planning Authority and as landowner.

Recommendation

- 1. To agree the comments set out in this Report and in the attached Appendices as the County Council's formal response to the Great Yarmouth Local Plan Part 2 (Regulation 19);**
- 2. To Agree that where concerns are raised in this report, these will be taken forward as soundness objections as the County Council considers these matters undermine the effectiveness of the Plan;**

<p>3. To Agree that any further detailed technical comments / representations (e.g. covering highway or drainage matters) be dealt with through delegated officer powers.</p>
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1. Background and Purpose

- 1.1. The County Council has been invited to make representation on the Final Draft of the Great Yarmouth Local Plan Part 2 (Proposed Submission Version) under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012 (<https://www.great-yarmouth.gov.uk/planning-consultations>). The Plan has been prepared in line with the Great Yarmouth Core Strategy (Local Plan Part 1), which was adopted in December 2015. The County Council is a statutory consultee in the preparation of Development Plans, and procedures have been agreed by the Planning and Highways Delegations Committee (July 2019) covering Local Plan consultations, enabling member-level involvement in the process. The agreed procedures supplement, the County Council's ongoing engagement with plan making bodies under the Localism Act (2011) in respect of its "duty to cooperate".
- 1.2. The principal role of the County Council in responding to the above Local Plan is in respect of the Authority's statutory responsibilities as:
- Highways Authority;
 - Minerals and Waste Planning Authority;
 - Lead Local Flood Authority (LLFA);
 - Public Health Body; and
 - Service Provider (e.g. covering Education; Libraries; Adult Social Care etc).
- 1.3. In addition, the County Council has an advisory environmental role and economic development function, which may also need to feed into any response made to the above Local Plan along with any land-owning interests the County Council may have.
- 1.4. The County Council has already made a series of detailed comments on earlier iterations of the Local Plan Part 2 under Reg 18 of the above mentioned Local Planning Regulations in September 2018; and again, on a series of focussed changes in September 2019.
- 1.5. At this stage (Reg 19) comments should only be made in respect of the following matters:
- Soundness – whether the plan has been positively prepared; Justified; effective and consistent with National Policy; and
 - Legally Compliant – whether the Plan has been prepared in line with all necessary regulations and meets the legal duty to cooperate.

As such if the County Council has any comments at this stage, these should be on the above matters and need to be taken forward as formal objections.

2. Key Proposals in the Local Plan

2.1. The key elements of the Local Plan (Part 2) include:

- Amended Core Strategy Housing numbers across the Borough covering the period 2013 -2030;
- Detailed Site allocation Policies; and
- An updated policy on infrastructure delivery (Planning Obligations).

2.2. The impact of these policies is set out below and in the attached Appendices:

3. Impact of the Proposal

Assessment of Local Plan

3.1. **Amended Housing Numbers** – Policy UCS3 (Adjustment to Core Strategy Housing Target) amends the Core Strategy Housing provision target from 7,140 dwelling (2013 – 2030) to 5,303. This amendment is to reflect new Government Guidance, which introduced a standardised method for calculating housing requirements. Notwithstanding the amended housing provision target the Borough Council has through the Local Plan sought to provide some 7,043 dwellings in the Plan Period, giving a buffer / over-provision of around 33%. The Local Plan indicates that under the new housing need target this enable the Borough Council to demonstrate a deliverable supply of housing over a five year period.

3.2. **Comment** - The level of housing set out in the Local Plan (over 7,000) is designed to ensure delivery of the housing target in Policy UCS3 and as such is supported.

3.3. **Proposed Housing Allocations** – The Local Plan makes a number of new housing allocations, (Maps of which can be found using the following link <https://www.great-yarmouth.gov.uk/planning-consultations>):

Main Towns

- Land South of Links Road, Gorleston-on-Sea (Policy GN1) for 500 dwellings;
- Emerald Park, Gorleston-on-Sea (Policy GN.2) for 100 dwellings;
- Land at Ferryside, High Road, Gorleston (Policy GN.3) for (20 dwellings);

Key Service Centres

- Land West of Jack Chase Way, Caister on Sea (Policy CA.1) for 725 dwellings;

Primary Villages

- Land south of New Road, Belton (Policy BN.1) for 100 dwellings;
- Land at Former Pontins Holiday Camp, Hemsby (Policy HY.1) for 190 dwellings;
- Land West of Coast Road, Hopton on Sea (Policy HP.2) for 40 dwellings;

- Land North of Hemsby Road, Martham (Policy MA.1) for 95 dwellings;
- Land south of Cromer Road, Ormesby St Margaret (Policy OT.1) for 190 dwellings; and
- Land North of Barton Way, Ormesby St Margaret (policy OT.2) for 32 Dwellings.

3.4. **Comments** – The proposed housing allocations are generally supported in terms of their location and broad sustainability; and will assist in the delivery of housing across the Borough. Moreover, the location and scale of housing is considered to be consistent with the Settlement hierarchy set out in Policy CS.2 of the adopted Core Strategy (Local Plan Part 1).

However, there are a number of detailed matters arising regarding:

- (a) Concerns about the effectiveness of the above Policies in addressing the delivery of key County Council infrastructure and services such as education and library provision on some of these proposed sites;
- (b) Concerns about the adequacy of the above policies in providing appropriate highway / transport safeguards and provision;
- (c) Concerns in relation to mineral resource safeguarding; and
- (d) County Council land-owner concerns regarding some of the above site allocation policies.

3.5. Detailed Comments on these sites are set out in the Appendices to this report along with detailed comments / concerns in relation to other parts of the Local Plan.

4. **Evidence and Reasons for Decision**

4.1. Whilst it is proposed that the County Council is generally supportive of the Local Plan, it is felt that there are amendments necessary to a number of the site allocation policies and supporting text in order to ensure the effective delivery of County Council infrastructure and services.

4.2. The comments in this report and those set out in the Appendices will form the basis for the County Council's formal representations on the Local Plan, and if necessary form the basis for the provision of evidence at the Local Plan Examination.

5. **Alternative Options**

5.1. The recommendations in this report is to agree the comments set out in the report and accompanying appendices. The alternative is to remove and/or add additional comments/representations on the Local Plan, however, this is not considered appropriate given the sustainable aims and objectives of this emerging Local Plan, which the County Councils supports.

6. **Financial Implications**

6.1. While there are no immediate financial implications, there are a number of policies in the Local Plan, which it is felt need amending to provide greater clarity in relation to developer funding of County Council infrastructure in line with the

County Council's Planning Obligations Standards (March 2020)
(<https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning-applications/planning-obligations>)

7. Resource Implications

7.1. Staff:

There are no immediate staff implications

7.2. Property:

There are potential property implications as the County Council is land-owner on one of the proposed allocations (see detailed comments set out in the Appendices in relation to Policy GN1 (Land South of Links Road Gorleston) and has other land owning interests across the Borough.

7.3. IT:

There are no immediate implications

8. Other Implications

8.1. Legal Implications

The County Council is a statutory consultee on Development Plans - Local Plans; Neighbourhood Plans; and Marine Plans; and on NSIPs; and other development affecting the County Council as service provider. Policies and proposals can potentially have serious implications for the County Council in its role as: Highway Authority; Minerals and Waste Authority; landowner; and as service provider e.g. for schools, libraries and fire service infrastructure.

8.2. Human Rights implications

None at this stage

8.3. Equality Impact Assessment (EqIA) (this must be included)

A detailed equality impact assessment has not been carried out as this report is responding to another Local Authority's Plan, however, consideration has been given to equality issues. The Council's Planning functions are subject to equality impact assessments.

The recommended comments relate to the County Council's role as a statutory consultee. This report and the comments aim to ensure that any new housing allocations will have a positive impact on communities in terms of supporting and enhancing the provision of services; support well-being; and support the delivery of infrastructure to keep people safe.

8.4. Health and Safety implications (where appropriate)

The delivery of key infrastructure such as schools and sustainable transport provision will ensure well planned new communities, which can support public health through opportunities for cycling and walking.

- 8.5. **Sustainability implications** (where appropriate)
- 8.6. The County Council's timely input as a statutory consultee will provide an opportunity for the Authority to influence the outcome of these Plans and ensure that appropriate County Council infrastructure is sought to deliver sustainable growth across the County as a whole.
- 8.7. **Any other implications**
- None

9. Risk Implications/Assessment

- 9.1. No risk associated with this report other than those implications outlined above.

10. Select Committee comments

- 10.1. Not Applicable given the timetable for responding to this Local Plan consultation.

11. Recommendations

- 11.1. 1. **To agree the comments set out in this Report and in the attached Appendices as the County Council's formal response to the Great Yarmouth Local Plan Part 2 (Regulation 19);**
2. **To Agree that where concerns are raised in this report, these will be taken forward as soundness objections as the County Council considers these matters undermine the effectiveness of the Plan;**
- 1.3. **To Agree that any further detailed technical comments / representations (e.g. covering highway or drainage matters) be dealt with through delegated officer powers.**

12. Background Papers

- 12.1. Great Yarmouth Core Strategy Local Plan (Part 1) – Adopted 2015 <https://www.great-yarmouth.gov.uk/article/2489/Current-Local-Plan>
- 12.2. Great Yarmouth Local Plan Part 2 Final Draft Regulation 19 – February 2020 <https://www.great-yarmouth.gov.uk/planning-consultations>
- 12.3. Norfolk County Council Planning Obligations Standards (March 2020) <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning-applications/planning-obligations>

Officer Contact

If you have any questions about matters contained in this paper, please get in touch with:

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Email address: stephen.faulkner@norfolk.gov.uk



If you need this report in large print, audio, braille, alternative format or in a different language please contact 0344 800 8020 or 0344 800 8011 (textphone) and we will do our best to help.

Great Yarmouth Local Plan Part 2 – Final Draft Plan Regulation 19 Norfolk County Council Response

April 2020

1. Introduction

- 1.1. The County Council welcomes the opportunity to comment on the above Local Plan – Part 2 Pre-submission Version (Reg 19) – referred to as draft Local Plan in the comments below.

2. Housing Figures and Comments

- 2.1. **Policy UCS3 Adjustment to Core Strategy Housing Target** - The draft Local Plan has an amended / adjusted housing target provision figure of at **least 5,303** dwellings (between 2013 – 2029)(16 years) compared to the Core Strategy figure of 7,140.

This target figure is broadly the same as the figure the Borough Council previously consulted on through their Reg 16 Local Plan Part 2 Consultation in 2018. The updated housing target reflects the standardised methodology set out in the National Planning Policy Guidance (NPPG) for calculating housing need.

- 2.2. The draft Local Plan indicated the following housing breakdown:

Table 1

Completions 2013 – 2019 (5 years)	1,310
Committed Development (Planning Permissions)	2,953
Remaining development on Strategic allocation likely to come forward in Plan period	266
New Allocation in the draft Local Plan	1,722
Windfall	742
Total	7,043
Buffer	33%

- 2.3. **Comment / Support** - The draft local plan is providing some 7,043 dwellings as set out in Table 1 above. This will result in an over-provision / buffer of 33% and is designed to ensure delivery of the housing target in **Policy UCS3** and as such is supported.

- 2.4.

The housing growth is distributed slightly differently from the planned distribution

in the Reg 18 consultation and the adopted Core Strategy Policy CS.2 as follow:

2.5.	Settlement Hierarchy	Policy CS2 % Intended	New Distribution in draft Local Pan -
2.6.	Main Towns	35	37
2.7.	Key Service Centres	30	32
2.8.	Primary Villages	30	28
2.9.	Secondary Villages	5	4
2.10.	Total	100	100

- 2.11. **Comment / Support** - The County Council continues to support the housing levels and distribution set out in the draft Local Plan.

3. **Planning Obligations - Policy GSP8**

- 3.1. **Comment / Concern** (Planning Obligations)

The County Council welcomes the inclusion of a further planning obligations policy in the Local Plan (i.e. in addition to the extant Policy CS.14 set out in the adopted Core Strategy) and its specific reference to County Council infrastructure, including education, library and transport provision.

- 3.2. However, with regard to “development viability” referred to in both the policy and supporting text (Paragraph 2.45), there needs to be further clarity indicating that where there is a demonstrable viability issue associated with a particular development proposal that any reduction in obligations should not affect:

- (a) the overall sustainability of the scheme (there needs to be adequate local education provision);
- (b) the overall safety (e.g. highway safety or access through cycling and walking not compromised);
- (c) potential safeguarding issues - such as children needing to attend non-catchment schools and possibly using unsafe routes to school.

- 3.3. Paragraph 2.41 – for clarification purposes the third sentence ought to be amended to read:

“Through the protocol, the Borough Council will *consult Norfolk County Council Public Health and the Sustainable Transformation Partnership (STP)* for all housing.....”

It is understood that the STP Estates Group will provide /offer a “one stop” approach for planning authorities to engage with the wider health system.

4. **Development Limits Policy GSP.1**

- 4.1. **Comment / Support**– the County Council welcomes reference in the Policy to development being permissible outside of Development limits in exceptional

circumstances including for the provision of utilities and highway infrastructure.

The County Council also welcomes reference in Paragraph 2.5 referring to other “specific policies in the Local Plan” allowing for development outside of development limits, particularly Policy C.2 (Educational Facilities), which allows for educational facilities to be expanded outside of such limits (see below comments to Policy C.2).

- 4.2. **Policy C.2** (Educational Facilities) – the County Council supports this policy

5. **Neighbourhood Plan Area Requirement - Policy GSP2**

- 5.1. **Comment / welcome-** The County Council generally welcome this policy; however, it is felt that that criteria (j) should be amended as follows to provide both clarity and ensure sustainable development:

“(j) the settlement size, provision of and access to local facilities (including schools; doctors’ surgeries; and convenience shops) and”

6. **Great Yarmouth Port and Harbour Area - Policy GY10**

- 6.1. **Comment / Support–** the County Council supports the encouragement in the Policy to port related development and in particular offshore energy related development. The offshore wind energy sector has the potential to provide significant employment and skill opportunities locally. The County Council is working closely with the offshore wind Energy Sector, the Borough Council and the Local Enterprise Partnership (LEP) to develop a series of Skills and Employment Strategies associated with the current round of offshore wind farms, which will benefit the Port and Harbour area.

- 6.2. **Comment / Concern-** The Supporting text to the above Policy (**Paragraphs 3.58 – 3.62**) ought to make specific reference to the Third River Crossing as a major infrastructure project, which if approved and constructed will significantly improve accessibility to the Port and Harbour areas and support the wider regeneration of the waterfront and town centre.

7. **Detailed Comments / Concerns on Allocations – Infrastructure Delivery**

(see also Highway comments below section 9)

- 7.1. **Policy GN1** Land off Links Road Gorleston-on-Sea –

Welcome reference made in the Policy and supporting text to the need for financial contributions being required in respect of education and library provision.

However, there are concerns, regarding **Paragraphs 3.75; and 3.76** where it is felt that the cost per dwellings is too prescriptive and will inevitably change over time both due to inflation, but also potentially if there are any demographic changes or changes in legislation. As such the figures in the above paragraphs should be removed and replaced with text as follows:

“Contributions will be sought in line with the County Council’s adopted Planning Obligations Standards”

Without this amendment this could undermine the effective and sustainable delivery of the allocation i.e. result in insufficient infrastructure being provided.

7.2. Table 3.2 for the above reasons should be removed.

7.3. **Policy GN2** Emerald Park Gorleston-on-Sea

7.4. Welcome reference made in the Policy and supporting text to the need for financial contributions being required in respect of library provision. It is noted that there is no reference to the potential financial requirement towards education provision. While the County Council currently does not consider there will be a need for such additional provision at this time, it is felt that the Policy ought to indicate that a financial contribution may be required following an assessment of need at the time an application is submitted given that the Local Plan will run until 2029 and circumstance can change. Clearly local circumstances may change, such as numbers on roll, demographic bulges; as well as potential changes in legislation.

Comment / Concern - Reference in Paragraph 3.88 to the library cost per dwellings is too prescriptive and will inevitably change over time due to inflation and potentially if there are any changes in legislation. As such the figure in the above paragraph should be removed and replaced with text as follows:

“Contributions will be sought in line with the County Council’s adopted Planning Obligations Standards”

Without this amendment this could undermine the effective and sustainable delivery of the allocation i.e. result in insufficient infrastructure being provided.

7.5. Table 3.3 for the above reasons should be removed.

7.6. **Policy GN3** – Land at Ferryside High Road Gorleston-on-Sea

7.7. Welcome reference made in the Policy and supporting text to the need for financial contributions being required in respect of library provision.

Comment / Concern It is noted that there is no reference to the potential financial requirement towards education provision. While the County Council currently does not consider there will be a need for such additional provision at this time, it is felt that the Policy ought to indicate that a financial contribution may be required following an assessment of need at the time an application is submitted given that the Local Plan will run until 2029 and circumstance can change. Clearly local circumstances may change, such as numbers on roll, demographic bulges; as well as potential changes in legislation.

Reference in Paragraph 3.99 to the library cost per dwellings is too prescriptive and will inevitably change over time due to inflation and potentially if there are any changes in legislation. As such the figure in the above paragraph should be removed and replaced with text as follows:

“Contributions will be sought in line with the County Council’s adopted Planning Obligations Standards”

Without this amendment this could undermine the effective and sustainable

delivery of the allocation i.e. result in insufficient infrastructure being provided.

7.8. Table 3.4 for the above reasons should be removed.

7.9. **Policy CA.1** Land West of Jack Chase Way Caister-on-Sea

7.10. Welcome reference made in the Policy and supporting text to the need for financial contributions being required in respect of education and library provision.

Comment / Concern - it is felt that the specific reference in Paragraphs 3.142; and 3.144 to the cost per dwellings is too prescriptive and will inevitably change over time both due to inflation, but also potentially if there are any demographic changes or changes in legislation.

As such the figures in the above paragraphs should be removed and replaced with text as follows:

“Contributions will be sought in line with the County Council’s adopted Planning Obligations Standards”

Without this amendment this could undermine the effective and sustainable delivery of the allocation i.e. result in insufficient infrastructure being provided.

7.11. Table 3.6 for the above reasons should be removed.

7.12. **Policy BN1** – Land South of New Road Belton

7.13. Welcome reference made in the Policy and supporting text to the need for financial contributions being required in respect of library provision.

Comment / Concern - It is noted that there is no reference to the potential financial requirement towards education provision. While the County Council currently does not consider there will be a need for such additional provision at this time, it is felt that the Policy ought to indicate that a financial contribution may be required following an assessment of need at the time an application is submitted given that the Local Plan will run until 2029 and circumstance can change. Clearly local circumstances may change, such as numbers on roll, demographic bulges; as well as potential changes in legislation.

Reference in Paragraph 3.163 to the library cost per dwellings is too prescriptive and will inevitably change over time due to inflation and potentially if there are any changes in legislation. As such the figure in the above paragraph should be removed and replaced with text as follows:

“Contributions will be sought in line with the County Council’s adopted Planning Obligations Standards”

Without this amendment this could undermine the effective and sustainable delivery of the allocation i.e. result in insufficient infrastructure being provided.

7.14. Table 3.8 for the above reasons should be removed.

7.15. **Policy HY 1** Land at Former Pontins Holiday Camp Hemsby

7.16. Welcome reference made in the Policy and supporting text to the need for financial contributions being required in respect of education and library provision.

Comment / Concern - it is felt that the specific reference in Paragraphs 3.178;

and 3.180 to the cost per dwellings is too prescriptive and will inevitably change over time both due to inflation, but also potentially if there are any demographic changes or changes in legislation.

As such the figures in the above paragraphs should be removed and replaced with text as follows:

“Contributions will be sought in line with the County Council’s adopted Planning Obligations Standards”

Without this amendment this could undermine the effective and sustainable delivery of the allocation i.e. result in insufficient infrastructure being provided.

7.17. Table 3.9 for the above reasons should be removed.

7.18. **Policy HP2** - Land to the West of Coast Road Hopton-on-Sea

7.19. Welcome reference made in the Policy and supporting text to the need for financial contributions being required in respect of education and library provision.

Comment / Concern - it is felt that the specific reference in Paragraphs 3.194; and 3.196 to the cost per dwellings is too prescriptive and will inevitably change over time both due to inflation, but also potentially if there are any demographic changes or changes in legislation.

As such the figures in the above paragraphs should be removed and replaced with text as follows:

“Contributions will be sought in line with the County Council’s adopted Planning Obligations Standards”

Without this amendment this could undermine the effective and sustainable delivery of the allocation i.e. result in insufficient infrastructure being provided.

7.20. Table 3.10 for the above reasons should be removed.

7.21. See also Minerals and Waste comments below to this Policy.

7.22. **Policy MA1** Land North of Hemsby Road Martham

7.23. Welcome reference made in the Policy and supporting text to the need for financial contributions being required in respect of education and library provision.

Comment / Concern - it is felt that the specific reference in Paragraphs 3.205; and 3.207 to the cost per dwellings is too prescriptive and will inevitably change over time both due to inflation, but also potentially if there are any demographic changes or changes in legislation.

As such the figures in the above paragraphs should be removed and replaced with text as follows:

“Contributions will be sought in line with the County Council’s adopted Planning Obligations Standards”

Without this amendment this could undermine the effective and sustainable delivery of the allocation i.e. result in insufficient infrastructure being provided.

7.24. Table 3.11 for the above reasons should be removed.

- 7.25. **Policy OT1** Land South of Cromer Road Ormesby St Margaret
- 7.26. Welcome reference made in the Policy and supporting text to the need for financial contributions being required in respect of education and library provision.
- Comment / Concern** - it is felt that the specific reference in Paragraphs 3.222; and 3.223 to the cost per dwellings is too prescriptive and will inevitably change over time both due to inflation, but also potentially if there are any demographic changes or changes in legislation.
- As such the figures in the above paragraphs should be removed and replaced with text as follows:
- “Contributions will be sought in line with the County Council’s adopted Planning Obligations Standards”
- Without this amendment this could undermine the effective and sustainable delivery of the allocation i.e. result in insufficient infrastructure being provided.
- 7.27. Table 3.12 for the above reasons should be removed.
- 7.28. **Policy OT2** Land North of Barton Way Ormesby St Margaret
- 7.29. Welcome reference made in the Policy and supporting text to the need for financial contributions being required in respect of education and library provision.
- Comment / Concern** - it is felt that the specific reference in Paragraphs 3.230; and 3.232 to the cost per dwellings is too prescriptive and will inevitably change over time both due to inflation, but also potentially if there are any demographic changes or changes in legislation.
- As such the figures in the above paragraphs should be removed and replaced with text as follows:
- “Contributions will be sought in line with the County Council’s adopted Planning Obligations Standards”
- Without this amendment this could undermine the effective and sustainable delivery of the allocation i.e. result in insufficient infrastructure being provided.
- 7.30. Table 3.13 for the above reasons should be removed.
8. **Minerals and Waste**
- 8.1. **Comments / Concern** – Policy HP.2 (Land to the West of Coast Road, Hopton on Sea.
- 8.2. Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy HP2 is currently unsound; as it is inconsistent with national policy, and the adopted Development Plan in Norfolk, in relation to mineral resource safeguarding.
- The policy can be made sound by including the wording below, which was included in the response by the Mineral Planning Authority, to the Regulation 18 new sites consultation in November 2018.
- 8.3. Insert the following text into Policy HP2:
- ‘The site is underlain by a defined Mineral Safeguarding Area for sand and

gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'

9. Highway Comments

- 9.1. While the County Council as Highway Authority has a number of detailed comments/concerns to the proposed allocations in the emerging Local Plan, it should be noted that all of these sites are considered in principle as being acceptable in broad sustainable transport terms subject to the detailed highway comments outlined below being addressed.

In addition to the comments below further detailed technical comments will be made under delegated officer powers:

- 9.2. **Policy GN1** Links Road, Gorleston – While the policy reflects most of the County Council's previous comments, it is felt that there are highway challenges associated with this site. Of particular concern is local parking, which could encroach upon visibility splays.

The County Council considers that without the inclusion of waiting / parking restrictions along Links Road to the policy wording, the policy as written raises **highway concerns**.

- 9.3. **Policy GN2** Emerald Park, Gorleston – The Policy needs to address the following:

- Wood Farm Lane needs to be improved to a minimum width of 5.5m and 2.0m footway to be provided over length required to enable safe access from Beaufort Way.
- 2.0m wide footway required from the south western vehicular access to Greenacres, north eastwards to connect with the existing facility at Ormiston Herman Academy, Oriel Avenue.

The County Council considers that without the inclusion of the above amendments to the policy wording, the policy as written raises **highway concerns**.

- 9.4. **Policy GN3** Ferryside, High Road, Gorleston –the policy needs to be explicit that there should be no vehicular access from Ferryboat Lane or Malthouse Lane.

The County Council considers that without the inclusion of the above amendment to the policy, the policy as written raises **highway concerns**.

- 9.5. **Policy GN6** Shrublands – The draft omits the County Council's requirements for:

- submission of a Transport Statement and implementation of any agreed mitigation requirements,
- visibility at the access to be provided in accordance with Manual for Streets (MfS);
- widening of the frontage footway to a minimum of 2.0m and provision of a DDA compliant bus stop at the site frontage.

The County Council considers that without the inclusion of the above

amendments to the policy wording, the policy as written raises **highway concerns**.

- 9.6. **Policy CA1** Land west of Jack Chase Way, Caister - The draft omits the County Council's requirements:
- for no access from the A149, accesses shall be in a form to encourage reduced vehicle speeds and shall accord with Design Manual for Road and Bridges (DMRB);
 - connection if feasible with recreation area east of Jack Chase Way;
 - reduction of Jack Chase Way speed limit to 40mph max and removal of frontage hedge to create sense of place.

The County Council considers that without the inclusion of the above amendments to the policy wording, the policy as written raises **highway concerns**.

- 9.7. **Policy BN1** New Road, Belton –The Policy needs the following requirements:
- Transport Assessment required along with implementation of any agreed measures, vehicular access via new roundabout junction at New Road.
 - Frontage development required at Church road along with provision of 2.0m wide footway and carriageway widening to a minimum of 5.5m,
 - Pedestrian & cycle access to Church Lane particularly to footpath between Church La and St. Georges Rd, provision of 3.0m shared use cycleway/footway for full New Road frontage, extending westwards along New Road to its junction with Stepshort,
 - Widening to 3.0m of existing cycleway at north side of New Road required from Stepshort eastwards to the recreational ground.
 - Travel plan required,
 - Provision of DDA compliant bus stops in both directions at New Road frontage.

The County Council considers that without the inclusion of the above amendments to the policy wording, the policy as written raises **highway concerns**.

- 9.8. **Policy HY1** Pontins Holiday Camp, Hemsby – Site has outline consent and a S106 has been completed. In addition, the policy should make provision for:
- a toucan crossing at Kingsway; and
 - a Travel Plan.

The County Council considers that without the inclusion of the above amendments to the policy wording, the policy as written raises **highway concerns**.

- 9.9. **Policy HP1** South of Hopton-on-Sea – In addition to the policy requirements, the County Council would seek submission of a:
- Transport Assessment and implementation of any agreed measures,
 - Acceptable vehicular access;

- Provisions for sustainable travel as agreed by the LHA, and
- Implantation of a Travel Plan

The County Council considers that without the inclusion of the above amendments to the policy wording, the policy as written raises **highway concerns**.

9.10. **Policy HP2** Land to the west of Coast Road – the policy requires:

- Reference to submission of a TA and
- Implementation of agreed measures –

The TA will consider wider highway issues than just the site access and may result in requirement for off-site highway works.

The County Council considers that without the inclusion of the above amendments to the policy wording, the policy as written raises **highway concerns**.

9.11. **Policy MA1** North of Hemsby Rd, Martham – the Policy needs to include:

- An assessment of whether Back Lane South should be closed to motor vehicles,
- Hemsby Road 30mph speed limit to be extended eastwards to include site extent,
- Measures to be provided to encourage reduced vehicle speeds.

The County Council considers that without the inclusion of the above amendments to the policy wording, the policy as written raises **highway concerns**.

9.12. **Policy OT1** South of Cromer Rd, Ormesby St Margaret – Policy requires reference to:

- The need for a Transport Assessment (TA),
- The need for a Travel Plan;
- An agreed access strategy;
- Two vehicular accesses at Cromer Road and 2.0m wide footway for full site frontage at Cromer Rd;
- No access from / to A 149;
- Pedestrian & cycle access at Filby Rd; and
- DDA compliant bus stops in each direction at Cromer Road frontage.

The County Council considers that without the inclusion of the above amendments to the policy wording, the policy as written raises **highway concerns**.

9.13. **Policy OT2** North of Barton Way, Ormesby St Margaret – the Policy needs the following amendments:

- Access from Barton Way,
- Layout of any development to provide natural surveillance / overlooking of the PROW, it must not be bounded by high boundary hedges / fences.

The County Council considers that without the inclusion of the above amendments to the policy, the policy as written raises **highway concerns**.

10. **Lead Local Flood Authority (LLFA) Comments**

- 10.1. In addition to the comments below further detailed technical comments will be made under delegated officer powers:
- 10.2. Policy E1 (Flood Risk) covers all forms of flood risk and follows national advice and guidelines set out in the NPPF (National Planning Policy Framework) and NPPG (National Planning Policy Guidance). As such the LLFA deem this to be acceptable.
- 10.3. However, the LLFA have the following issues to raise:
 - 10.4 – Does this mean that it is more likely that affordable housing will be built in areas of flood risk, with the residents there being the least able to cope with flooding even if the development is built to be resilient to flooding?
 - 10.6 – Do the FFLs and safe refuge levels refer to all sources of flooding and if so extra modelling will be required, above the standards we currently ask for?

(NB these issues do not raise any soundness concerns).
- 10.4. In addition, please see detailed comments in Appendix 2. Please note that these technical comments do not raise any soundness concerns.

11. **NPS – Landowner Comments**

Policy GN1 Land south of Links Road, Gorleston-on-Sea

- 11.1. NCC supports the principle of policy GN1 which seeks the allocation of 25 hectares of NCC land for approximately 500 dwellings and open space, subject to the inclusion of a retail/commercial element. In the previous **Local Plan Part 2 (Further Focused Changes) Consultation**, Criterion 4 of draft policy ADA1 referred to the provision of new small scale commercial units or convenience-led retailing (200sq.m floorspace limitation) within the north-western corner of the site with appropriate landscaping.
- 11.2. NPS on behalf of NCC suggested the scale of any commercial or convenience led retail development should not be restricted to 200sq.m but should be tested by way of the market and specifically a retail impact assessment that could be submitted as part of any planning application for the site, and be of a scale that is compatible with the proposed scale of housing development.
- 11.3. It is understood from Great Yarmouth Local Plan Part 2 Consultation Statement (February 2020) that the retail/commercial element was removed from the proposed allocation in order to consolidate retail need at Beacon Park District Centre to ensure viability of the district centre in accordance with policy CS7 of

the Core Strategy.

- 11.4. NCC as landowner, objects to the soundness of the revised policy which seeks to remove the retail/commercial element from policy GN1, on the following grounds;
- The retail element was included by GYBC in the further focused changes consultation within the additional draft allocation.
 - It is considered that the proposed retail/commercial site at land South of Links Road (draft policy GN1) would be more suitable for the broad type of retail development proposed than Beacon Park District Centre due to its more prominent location and accessibility being situated adjacent to the A47 which is a main arterial road providing access to the north and south. A prominent site location with good visibility is an integral part of any commercial operator/national food retailers business model. It should be noted that in 2014, planning consent was granted for a new major food store in Beacon Park Growth Area which has not been implemented.
 - The County Council is aware that there is a commercial operator/national food retailer who is seeking to deliver a commercial store on the Links Road site and is in the process of preparing a planning application. This demonstrates that the site is suitable and deliverable for a retail/commercial use, while the site at Beacon Park is untested.
 - The proposed site South of Links Road would be more accessible by foot for existing residents to the east of the A47 and from proposed housing to the South of Links Road than the retail provision at Beacon Park which has been located to support the needs of residents in the Beacon Park Growth area (mostly in Bradwell Parish). This would require the majority of the residents to the east of the A47 to arrive by car and would not result in a sustainable form of development.
- 11.5. **Comment / Concern** - It is recommended that policy GN1 be amended to allow the provision of a commercial/retail site to the South of Links Road which should be tested by way of the market and specifically a retail impact assessment submitted as part of any planning application on the site. The scale/floor area of the commercial/retail provision should be compatible with the scale of housing development in the area and be of a size, which would be viable for a commercial operator/retail provider to ensure its deliverability.
- 11.6. **Rollesby Inset Map 14**
- 11.7. It is noted that the Final Draft Plan has removed the proposed allocation of 20 houses on NCC land to the north of A149 in Rollesby (ADA9) which was included within the **Local Plan Part 2 (Further Focused Changes) Consultation** although Rollesby is currently preparing a Neighbourhood Plan which is seeking to allocate housing.
- 11.8. NPS Property Consultants, on behalf of Norfolk County Council as landowner has been working in partnership with Rollesby Parish Council on their Neighbourhood

Plan to help address the needs of the local community and provide land for housing.

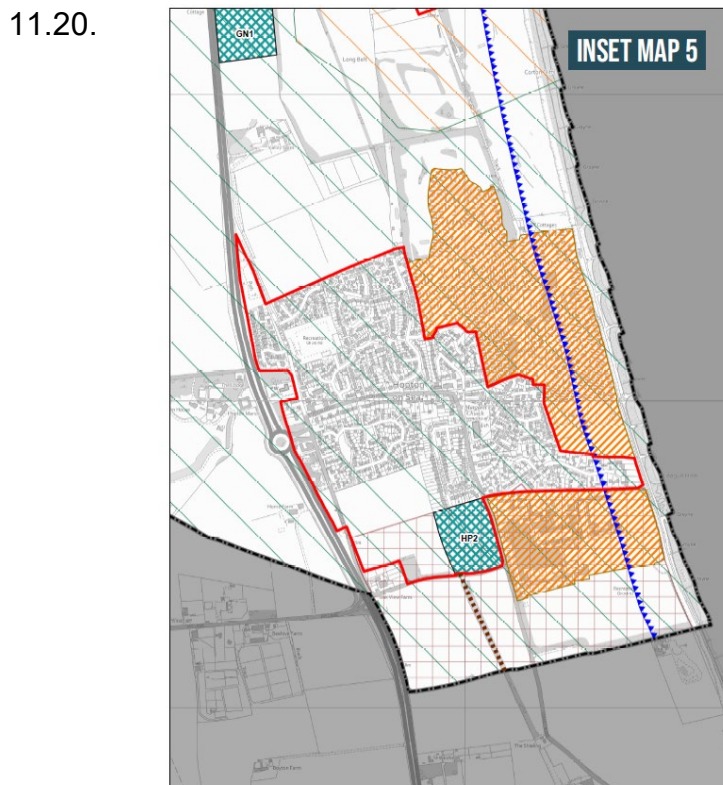
- 11.9. The Neighbourhood Plan is seeking to deliver 65 houses within 10 years and a further 25 houses in 10-15 years (subject to review of delivery) on land owned by Norfolk County Council to the north and south of Main Road to link the two parts of the village. The proposed housing allocations will allow the planned long term growth of the village by the local community and allow wider social and environmental benefits with the provision of affordable housing, land provided for recreational green space and amenity open space and highway improvements (including a reduced speed limit).
- 11.10. The GYBC Local Plan Part 2 Consultation statement suggests that given the emerging Rollesby Neighbourhood Plan seeks to allocate alternative sites for residential development and given the overall proposed over-supply of housing, the allocation is not necessary and therefore was deleted from the plan. However, the draft Neighbourhood Plan is still subject to public consultation and a public referendum in 2020 and the proposed housing allocation is not guaranteed.
- 11.11. **Comment / Concern** - The County Council would, therefore, still support the previous housing allocation in Rollesby (20 houses).
- 11.12. **GSP2: Housing Requirements for Neighbourhood Plan Area**
- 11.13. The previous draft policy for housing requirements in neighbourhood plan areas (ADP1) in the **Local Plan Part 2 (Further Focused Changes) Consultation** suggested an indicative housing requirement of 20 houses in Rollesby. The revised Policy GSP2 seeks to change this indicative housing requirement for Rollesby to zero.
- 11.14. The policy does allow Neighbourhood Plans to allocate land for housing within or outside of the defined Development Limits in addition to the requirement, subject to the proposal being consistent with a number of criteria including;
'The proportion (5%) of overall planned Borough housing growth indicated for the tier of the settlement hierarchy (Secondary Village) by Core Strategy Policy CS2.'
- 11.15. NCC previously had concerns that the housing proposed in Rollesby through the Neighbourhood Plan would exceed the 5% of planned housing growth in secondary and tertiary villages taking into account allocations in other villages. The policy wording failed to reflect the government's intention to increase housing supply and to allow neighbourhood plans to positively allocate new housing sites allowing local communities to have a say on the location, quantity and type of housing required in their village.
- 11.16. In the consultation statement on the Local Plan Part 2 GYBC confirmed that there is no 5% restriction on growth in secondary and tertiary villages. Policy CS2 states 'approximately 5%' and the growth can differ between settlements. The

policy would not prevent neighbourhood plan's to allocate above the need listed in ADP1, so long as the neighbourhood plan is in general conformity with the Core Strategy. The proposals in the neighbourhood plan were at the time of writing, broadly in conformity, particularly considering a longer plan period for the neighbourhood plan.

11.17. **Comment** - NCC is, therefore, supportive of the policy in principle provided GYBC recognise the need for housing growth in villages (in particular Rollesby) which can be allocated through a neighbourhood plan.

11.18. **Policy GSP3 – Strategic gaps between settlements**

11.19. Policy GSP3 is seeking a strategic gap to the south of Hopton to prevent development which would significantly reduce the physical gap between Hopton-on-Sea and Corton. This is in addition to the proposed strategic gap between Gorleston-on-Sea and Hopton-on-Sea to the north.



Extract from Final Draft Local Plan Policies Map – Proposed Submission (Regulation 19).

11.21. NCC have land to the south and north of the village which would be suitable for residential development should there be a need to expand the village in the future (while still retaining a significant gap between settlements). It should also be noted, that the improvements required to Longfulans Lane are also dependent upon land coming forward for development to the south in the future.

Comment - NCC would, therefore, support the policy to avoid the coalescence of settlements in principle, provided there is flexibility to allow modest growth to

Hopton in the future (subject to need) which would not significantly reduce the size and effectiveness of the gaps.

Reference Number	Policy/Site Details	Policy/Site Area (ha)	Proposed Land Use	Parish	At Risk of Surface Water Flooding?	3.33% AEP Event	1.00% AEP Event	0.1% AEP Event	Would Local Flood Risk / Surface Water Drainage constraints be severe enough to prevent development of this policy/site?	Level of Constraint	Recommendations	Additional Comments
GN3	Ferryside, High Road, Gorleston-on-sea	0.48	Residential	Great Yarmouth	No	No	No	No	No	Few or no constraints.	Standard information required at a planning stage.	No additional comments.
HY1	Land at Former Pontins, Hemsby	8.87	Residential	Hemsby CP	Yes - Minor to moderate	Yes Very minor ponding	Yes Very minor ponding	Yes Moderate ponding	No	Few or no constraints.	Standard information required at a planning stage.	No additional comments.
GN5	Beacon Park Business Extension	20	Commercial	Bradwell CP	Yes - Very minor	No	Yes Very minor ponding	Yes Very minor ponding	No	Few or no constraints.	Standard information required at a planning stage.	No additional comments.
BL1	Beacon Park District Centre	6.69	Commercial	Great Yarmouth	Yes - Very minor	No	Yes Very minor ponding	Yes Very minor ponding	No	Few or no constraints.	Standard information required at a planning stage.	No additional comments.
GY10	Great Yarmouth Port and Harbour	190.07	Commercial	Great Yarmouth	Yes	N/A	N/A	N/A	No	Few or no constraints.	Standard information required at a planning stage.	The policy covers a large area of Great Yarmouth Town. Therefore, comments are very generalised. There are areas of flood risk within the policy boundary, but nothing that would limit the policy outlined.
GY3	Hall Quay Policy Area	2.89	Residential and Commercial	Great Yarmouth	Yes - Minor	Yes Very minor ponding	Yes Very minor ponding	Yes Minor ponding	No	Few or no constraints.	Standard information required at a planning stage.	No additional comments.
L1	Holiday Areas (19 Sites - Already Existing)	N/A	Tourism	N/A	N/A	N/A	N/A	N/A	No	Few or no constraints.	Standard information required at a planning stage.	The policy is split over 19 sites, therefore bespoke comments per site are not possible. Generally, the sites have little flood risk. If expansion or change of use are planned at sites, then surface water flood risk and drainage must be considered.

Appendix 2