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# Report to South Norfolk Council

**by Louise Nurser BA (Hons) Dip UP MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Date 26 April 2016**

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO  
LONG STRATTON AREA ACTION PLAN**

Document submitted for examination on 6 March 2015

Examination hearings held between 14 and 16 July 2015

File Ref: PINS/I2630/429/5

## Abbreviations Used in this Report

AA	Appropriate Assessment
Consortium	Norfolk Homes Ltd and Norfolk Land Ltd.
DMPD	Development Management Policies Document
CNP	Cringleford Neighbourhood Plan
DMPD	Development Management Policies Document
DtC	Duty to Co-operate
LDS	Local Development Scheme
Framework	The National Planning Policy Framework
GNDP	Greater Norwich Development Partnership
GTLP	Gypsies and Travellers Local Plan
LDS	Local Development Scheme
JCS	Joint Core Strategy for Broadland, Norwich and South Norfolk
LP	Local Plan
LSAAP	Long Stratton Area Action Plan
MM	Main Modification
NPA	Norwich Policy Area
OAN	Objectively assessed need
Para	Paragraph
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
Sister documents	CNP, DMPD, SSAPD, and WAAP
SSAPD	Site Specific Allocations and Policies Plan
SNC	South Norfolk Council
SHMA	Strategic Housing Market Assessment
the Plan	Long Stratton Area Action Plan
WAAP	Wymondham Area Action Plan
2012 Regulations	<i>The Town and Country Planning (Local Planning) (England) Regulations 2012</i>

## **Non-Technical Summary**

This report concludes that the Long Stratton Area Action Plan provides an appropriate basis for the planning of the Plan area, subject to a number of main modifications being made.

South Norfolk Council has specifically requested that I recommend any modifications necessary to enable the plan to be adopted. All of the modifications to address this were proposed by the Council but where necessary I have amended detailed wording. I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows. However, the list is not intended to be a summary of all the modifications.

- To make sure the relationship with the other plans is correctly expressed.
- To commit to an early review of the plan.
- To set out which policies in the existing development plan are superseded.
- To clarify the approach regarding the housing requirement.
- To clarify the policy approach to employment land.
- To set out the policy approach regarding post 2008 commitments.
- To include the housing trajectory in the plan.
- To make it clear that a CIL is now in place.
- To amend various policies to ensure that they are clear, effective and consistent with national policy.
- To amend various policies to remove unreasonably restrictive or onerous requirements and to ensure appropriate flexibility.
- To amend the supporting text to various policies to explain their purpose and to clarify how they will be applied.
- To delete policies and policy criteria which unnecessarily duplicate other policies.
- To delete policy references which could confer development plan status on supplementary planning documents and other documents which are not part of the plan.
- To amend the geographic illustration of Policy LNGS1 on the policies map to provide a broad corridor in which the bypass could be constructed.
- To amend policies to improve connectivity within and out of Long Stratton.
- To reduce the extent of the Primary Shopping Area.

## Introduction

1. This report contains my assessment of the Long Stratton Area Action Plan (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. The basis for my examination is the submitted draft Long Stratton Area Action Plan (March 2015) which is the same as the document published for consultation in August 2014.
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant. These are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound or not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
4. The Main Modifications that are necessary for soundness and legal compliance all relate to matters that were discussed at the Examination hearings. Following these discussions, the Council prepared a schedule of proposed main modifications and carried out further sustainability appraisal and this schedule has been subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made an amendment to the detailed wording of some of the main modifications. None of these amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary, I have highlighted these amendments in the report.
5. Where reference is made in this report to an examination document, the document number is quoted, eg [F6]. All the examination documents are available on the Council's Examination website.

## Assessment of Duty to Co-operate

6. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
7. The Plan has been prepared in the context of the Joint Core Strategy for Broadland, Norwich and South Norfolk [B1]. This was produced by the three Councils of Broadland, Norwich and South Norfolk together with Norfolk County Council as the Greater Norwich Development Partnership (GNDP)<sup>1</sup>.

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<sup>1</sup> Now known as the Greater Norwich Growth Board.

8. Strategic matters relevant to the Duty to Co-operate have been resolved through the JCS. South Norfolk Council (SNC) has outlined its continuing collaborative approach to the Duty to Co-operate (DtC), as a means of successfully implementing the relevant strategic policies in the JCS, within the document entitled *Statement of Compliance with the Duty to Co-operate* (Ref F6). This shows appropriate engagement with the necessary local planning authorities and the various prescribed bodies.
9. Accordingly on the basis of the evidence before me I conclude that SNC has fulfilled its Duty to Co-operate with regard to this Plan.

## **Assessment of Soundness**

### **Preamble**

10. Besides the Long Stratton Area Action Area Plan (LSAAP), the South Norfolk Local Plan also comprises the adopted Joint Core Strategy (JCS), and Cringleford Neighbourhood Plan (CNP), together with the recently adopted Development Management Policies Document (DMPD), the Site Specific Allocations and Policies Document (SSAPD), and the Wymondham Area Action Plan (WAAP). The emerging Gypsy and Traveller Local Plan (GTLP) is currently under preparation. Once adopted, all of these will fully replace the South Norfolk Local Plan 2003 [the 2003 Local Plan].
11. The requirement to produce an Area Action Plan to guide proposed development at Long Stratton is identified within Policy 10 of the JCS.

### **Main Issues**

12. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified 6 main issues upon which the soundness of the Plan depends.

### **Issue 1- General approach and coverage**

*Are the Plan and allocations consistent with the JCS?*

13. The Council has based the plan on the evidence base which underpins the adopted JCS and the updated evidence which has informed the preparation of the recently adopted SSAPD, DMPD and WAAP. The policies of the adopted JCS<sup>2</sup> make explicit the need to provide for a minimum of 1800 dwellings, and a bypass to be funded by the housing, together with associated supporting infrastructure. The LSAAP sets out in detail how, and where, the broad policy objectives of the JCS are to be implemented.

*Are the site allocations and plan based on a sound process of Sustainability Appraisal?*

14. The site allocations<sup>3</sup> as submitted have come about following considerable consultation, a 'call for sites', detailed site assessment, and the development of alternative options for the location of the employment and housing growth.

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<sup>2</sup> Policies 4, 6, 9,10, 14, of the JCS.

<sup>3</sup> Policies LNGS1, LNGS2 and LNGS9 of the LSAAP.

The SA for the LSAAP has been an iterative process, which used the same methodology [D1 and F3] as that used for the recently adopted Local Plan documents.

15. Concerns have been raised that the SA should have considered in detail the impact of the promoted sites and the bypass on the infrastructure of the wider area, including that outside of the Area Action Plan boundary. However, the principle of the bypass and the levels of housing growth, have already been established through the policies of the JCS [B1], which were themselves subject to detailed Sustainability Appraisal. In addition, the detailed SA of the options for growth within LSAAP included criteria relating to transport impacts and access to local services. Therefore, I consider that the methodology used was appropriate in this regard.
16. Furthermore, during the Hearings, representatives of both South Norfolk Council and the County Council confirmed they would ensure that the parishes potentially affected by the bypass, and the associated housing and employment developments, would be involved, at the appropriate time, in the scoping of any transport assessments to support any future planning application(s).
17. Historic England considers that the significance of the impacts on the relevant heritage assets has not been appropriately appraised. However, the SA reviewed the impact of the policies and sites within the LSAAP on designated heritage assets and broad environmental objectives relating to the historic environment<sup>4</sup> when considering site specific assessments and when appraising alternative options. Consequently, I am satisfied that these impacts were appropriately evaluated through the SA.
18. Moreover, further detailed consideration of the impacts of any developments will be considered at the planning application stage. Elsewhere in my report, I have recommended a number of main modifications to policies to ensure that matters relating to the historic environment are taken into account at the planning application stage.
19. As part of the SA, the Council tested the specific sites and alternative options for development in relation to the impact on high quality agricultural land. However, due to an incomplete evidence base relating to the location of Grade 3a agricultural land, the options were tested against the impact on Grades 1 and 2 only. Paragraph 112 of the Framework sets out the need to consider the economic and other benefits of the best and most versatile agricultural land (BMV). In order to ensure that the plan is sound amendments are recommended to ensure that this matter is adequately taken into account when planning applications are determined (**MM8**). I am satisfied that this requirement would not prejudice the delivery of the plan due to the size of the strategic allocation (LNGS1), and as the location of BMV land could be considered as part of the wider master planning process.
20. It was concluded as part of the Major Scheme Business Case [G10] for the Long Stratton bypass that an eastern route had fewer adverse environmental impacts than alternative routes to the west of the village and would be less

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<sup>4</sup> Table 0.1 Document F3

expensive. Taking into account the environmental constraints and greater costs associated with a potential western route, together with the willingness of the land owners to deliver both the housing and bypass as a package, I conclude that the general location of the strategic allocation (LNGS1) is appropriate. Furthermore, no realistic alternative has been brought forward which can deliver the housing, bypass and required infrastructure.

21. In addition, given the levels of development proposed by the policies of the JCS at Long Stratton, the development boundary for the settlement as modified by modification (**MM11**) to which I refer later in my report, is sensibly drawn to include the main built up areas and development allocations.

*Is the Plan period justified?*

22. As set out above, the production of the LSAAP derives directly from the JCS as a means of realising the delivery of the proposed development at Long Stratton. The plan period for the LSAAP and its sister plans is ten years. This is reasonable because, as subsidiary plans, they align with the end date of the JCS which runs to 2026. Nonetheless, whilst the Framework prefers a 15 year plan period, the Planning Practice Guidance (PPG) makes clear that plans can be found sound where planning authorities have not been able to identify sites or broad locations for growth in years 11- 15<sup>5</sup>.
23. However, the PPG also states that most plans require updating or reviewing at least every five years<sup>6</sup>. The Inspector who examined the SSAPD, DMPD and WAAP recommended modifications to require an early review of the plans. Similarly, I recommend a commitment to an early review (**MM30**).

*Is there duplication of policies amongst the development plans?*

24. Once adopted there will be seven development plan documents which make up the development plan for South Norfolk. Consequently, to ensure that the development plan as a whole is unambiguous and effective, a number of modifications are required to avoid duplication with policies within the DMPD, to aid clarity, and to remove policies that add nothing to the development plan. These are (**MM26**) which deletes Policy LNGS11 which refers to development both within and outside of the development boundary; (**MM21**) which removes Policy LNGS5 which refers to heritage assets and (**MM15**) which refers to affordable housing requirements within Policy LNGS1. Following the Written Ministerial Statement of 25 March 2015 (**MM15**) is required to remove the reference to energy efficiency standards from Policy LNGS1 to ensure consistency with national policy.
25. Policy DM1.1 within the DMPD sets out the Council's positive approach to sustainable development and this policy is applicable throughout the plan area. Consequently no further modification is required to make explicit the presumption in favour of sustainable development as set out in the Framework.

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<sup>5</sup> Reference ID 3-027-20140306

<sup>6</sup> Reference ID 12-008-20140306

**Issue 2- Whether the LSAAP is consistent with the CS in terms of housing delivery, and complies with the Framework, in seeking to meet, and deliver market and other housing, and in identifying sites and locations for development.**

*Need for housing*

26. The scale of housing development within the Plan area has already been set by the JCS. Policy CS9 [B1] requires a minimum of 1800 dwellings to be delivered in Long Stratton within the plan period. This is provided for within Policy LNGS1 of the LSAAP
27. Following the Wokingham judgment<sup>7</sup> there is no need, in the preparation of a Local Plan which deals with the allocation of sites to meet requirements set out in a Core Strategy, to consider whether the CS requirement represents or is informed by an up to date OAN. Rather, the test is whether the Local Plan provides for, and is able to deliver, the housing requirement which has already been set. Modifications are required to make clear that, taken collectively, the various plans for South Norfolk will seek to ensure that the housing requirement set by the JCS would be met in full (**MM1**). In the interests of clarity and effectiveness the housing trajectory should be set out (**MM2**).
28. A number of other housing developments have been granted planning permission within the LSAAP area. These will contribute to the JCS requirement for smaller sites within the NPA and have been considered by the Council to be deliverable now, and fall within the parameters of existing infrastructure constraints. As such, a modification is required to make this explicit and ensure that applications to vary the permissions would be supported in principle (**MM9**).

*Housing delivery*

29. The Greater Norwich Councils have recently published the 2014/15 Annual Monitoring Report for the JCS<sup>8</sup>. This has demonstrated that due to persistent under delivery of housing within the NPA a 20% buffer should be applied to the 5 year requirement. In common with the Inspectors of the recently adopted local plans for South Norfolk and Norwich City, I have taken the approach that the 5 year supply for development plan purposes should include allocated sites where these are deliverable. As such, whilst I note that such calculations cannot be expected to be precise, I have no reason to disagree with the position of the Council that as at 1 April 2015, with a 20% buffer, the South Norfolk 5 year supply within the NPA showed a 5.95 year supply or a surplus of around 966 units.
30. It was clear from the hearing sessions and the evidence that has been put to me that there is commitment from both the Council, and the landowners, to deliver the scale of housing proposed within Policy LNGS1 at Long Stratton during the Plan period [H1]. The Council forecasts that up to 420 dwellings would be completed in the period up to 2019/2020.

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<sup>7</sup> Gladman Developments Ltd v Wokingham Borough Council [2014] EWHC 2320

<sup>8</sup> Letter from SN to Inspector dated 7 March 2016

31. I note that, as yet, no planning application has been submitted for the site. However, considerable preparatory work has been undertaken and relevant legal agreements have been made between the land owners and site promoters to bring the housing and associated infrastructure forward [H1]. In addition, the construction of the bypass, which the delivery of the majority of the housing is dependent on, is one of the projects proposed to be unlocked through investment from the £440 million Greater Norwich City Deal [D5] and is identified as a project within the Greater Norwich Infrastructure Plan [G5].
32. However, even if the bypass could not be successfully delivered within the next five years, the plan as submitted, states that up to 250 dwellings or more, dependent on issues of viability and highway safety, could be constructed prior to the completion of the bypass. Therefore, notwithstanding the element of risk and time involved in bringing forward large allocations such as LNGS1, there is a reasonable prospect that a significant contribution to the 5 year supply of the SN element of the NPA will come forward from the allocation, together with the sites which have already been granted planning permission, as set out above.
33. In a worst case scenario, were the housing to be delayed beyond the five year period with no housing built this would result in the loss of 420 dwellings from the housing supply. However, this would be well within the surplus of around 966 units within the South Norfolk element of the five year supply for the NPA and would not in itself prevent a 5 year supply being achieved within South Norfolk as a whole. Over the longer term, the LNGS1 allocation would be likely to make a significant contribution to the delivery of the rolling 5 year supply of housing.
34. The bypass is fundamental to the delivery of housing at Long Stratton and its identification as a location for growth<sup>9</sup> <sup>10</sup>. Therefore, if it did not come forward, this would undermine the suitability of Long Stratton as a location for growth. In these circumstances a review of the Local Plan would be the appropriate vehicle to consider alternative provision on a district wide or NPA basis, rather than seeking to address any under provision in a localised area.
35. As submitted the plan requires that LNGS1 come forward as one application. Whilst I understand that this might prove advantageous to the Council in determining the application I do not consider this is a reasonable or flexible approach, nor one which could be enforced. Therefore a modification is required (**MM4**).

#### *Specialist housing*

36. JCS policy 4 requires the mix of housing to be justified through the SHMA, the most recent version of which is dated 2016 [H12a and H12b]. In line with Policy 4 of the JCS the plan includes a specific requirement to provide mixed tenure Housing with Care within the growth location of Long Stratton. However, the Planning Practice Guidance<sup>11</sup> makes clear that provision for self-build housing should also be identified within plans. Therefore, to ensure

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<sup>9</sup> Paragraph 6.19 JCS

<sup>10</sup> Paragraph 83 H10

<sup>11</sup> Reference ID:2a-021-02150326

consistency with the PPG a modification is required to allow for this (**MM12**). However, it is not necessary for the plan to set out how the demand should be assessed, instead it would be most appropriately determined at planning application stage, taking into account up to date advice contained within the PPG such as the need to provide a self- build register<sup>12</sup>.

### **Issue 3 – Whether the bypass, housing, associated transport, social, and green infrastructure are deliverable.**

#### *The master plan approach*

37. The general location of the LNGS1 allocation and the scale and composition of the development within it, have been broadly set by Policy 10 of the JCS. This sets out that the site must be comprehensively master planned taking into account the requirements of the policy. However, it is important that there is flexibility within the policy to respond to public consultation, up to date evidence, changing economic circumstances, and market signals without compromising the wider sustainability requirements of the proposal.
38. To that end, main modifications (**MM5** and **MM6**) are required to ensure the Plan is effective.

#### *Bypass Corridor and junction improvements*

39. The exact alignment of the bypass and its proposed design speed, relationship to existing buildings and proposed developments, as well as landscaping and pedestrian links, and the scale and form of subsequent junctions such as the Hempnall Crossroads, can only be determined when informed by detailed evidence, including transport assessment information relating to the wider area. Normally this would be provided in support of a planning application. As submitted, policy LNGS1 is overly prescriptive and predetermines the detailed design of the bypass and junctions in the absence of detailed supporting evidence. At the same time, as currently worded the policy would allow the route to change completely by written agreement. Consequently, there would be, on the one hand, no opportunity for flexibility within the identified corridor, and on the other, very little certainty at all as to where the route would lie. Therefore, the plan should instead identify a broad corridor in which the bypass could be constructed.
40. Concerns have been raised that the widened corridor would bring the bypass closer to the listed St Michael's Church and its graveyard, as well as extending the opportunity for more housing. However, the widening of the corridor would allow for further mitigation, such as additional landscaping and noise attenuation measures. It would also allow greater scope for appropriately designed pedestrian links. Moreover, I am satisfied that the impact of the bypass on the heritage asset of the Church could be appropriately considered at the planning application stage in light of national, and local heritage policies. I note Historic England has not made any representations relating to the amended corridor.

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<sup>12</sup> Reference ID:57-001020160401

41. Therefore, modifications (**MM5**, **MM11** and **MM15**) are necessary. These would be in the interests of effectiveness as they would provide certainty as to the broad location of the corridor and flexibility to enable the optimum design solution to be achieved, informed by detailed evidence and further public consultation through the master planning process and at the planning application stage. In addition, modification (**MM3**) is also necessary to ensure that the plan is justified and effective by not predetermining what form of junction the improvement to the Hempnall Crossroads will take.

#### *Threshold levels*

42. Given the adverse impacts of existing traffic in Long Stratton, in the absence of a bypass, only limited development would be appropriate on a network which has a long seated issue of traffic congestion which I was able to experience on my site visits, and when travelling to and from the hearing sessions.
43. Figures referred to by the promoter of the occupation of around 625- 830 dwellings being a suitable threshold<sup>13</sup> before the bypass would require to be completed would not be consistent with the approach set out in the JCS that, *it is not the intention of this JCS to permit housing growth to outstrip and be developed in advance of supporting employment and a full range of hard and soft infrastructure*<sup>14</sup>.
44. I consider that in the absence of detailed transport evidence that the 250 dwelling figure is reasonable. It is based on planning judgement, which seeks to allow some housing to come forward early on without adding significantly to congestion problems and provides some certainty to the developer that up to 250 dwellings could be occupied prior to the delivery of the bypass and link road. Moreover, Policy LNGS1 provides the flexibility that higher levels of development could be possible ahead of the construction of the bypass, subject to viability evidence and acceptability in highway terms. Consequently, I consider that the thresholds are not unreasonable, and rather than undermining the deliverability of the proposed development, support it.

#### *Social infrastructure*

45. Given the significant levels of development proposed it is important that there is sufficient supporting social infrastructure. In Policy LNGS1, as submitted, the area of land to be provided for a primary school is inadequate to serve the scale of development proposed, as is the size of the local library. Therefore, a site of 2 hectares should be provided for a primary school and provision made for the extension to the library.
46. There is no requirement to provide land, over and above that at the existing school, for secondary school provision to serve children from the new developments. However, early engagement between the Education Authority and Long Stratton High School is vital to enable the delivery of additional school places through its expansion on the existing site. Therefore, modifications (**MM7** and **MM13**) are required.

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<sup>13</sup> Paragraph 1.14 Long Stratton Area Action Plan: LNGS1- Bypass Delivery and Phasing Statement Cannon Consulting Engineers accompanying representations 23432 to 23515

<sup>14</sup> Paragraph 7.1 of the JCS

47. The land for the primary school will be provided as part of a planning obligation linked to LNGS1. Funding for the construction of the primary school, the expansion of the secondary school and the library will come from a mix of mainstream funding and CIL receipts.

#### *Green infrastructure*

48. Green infrastructure policies are vital to the successful integration of the bypass, and level of growth provided for within the LSAAP at Long Stratton into the wider area. They fulfil a number of important roles including helping to ensure a satisfactory appearance in relation to the village and surrounding countryside, and ensuring that development does not threaten vulnerable environments such as Fritton Common SSSI. As submitted there is an overlap between the detailed provisions of policy LNGS1 and the broad principles contained within policy LNGS6. Moreover, Policy LNGS6 does not clearly set out what developers will be required to achieve, and is aspirational in nature. Conversely, LNGS1 is too prescriptive in its reference to a number of proposals set out in the Green Infrastructure Map. In addition, some of the terms used within the policies such as *commons*, require clarification, as does the status of the Indicative Green Infrastructure Plan and the status of the projects listed within the plan. Consequently, **(MM8)** is required as it makes the plan effective by adding clarity to the supporting text and policies.

#### *Open Space and Recreation*

49. The policies of the plan set out to ensure adequate provision is made for both formal and informal recreation, and that existing facilities and land are protected. Policies LNGS1, and LNGS7 inappropriately elevate the Council's open space standards to development plan status. Therefore, modifications, **(MM14)** and **(MM23)** are required. A modification **(MM22)** is also required to Policy LNGS8 to clarify the approach to development where it would involve the loss of playing fields.

#### *Waste Water*

50. There was considerable discussion at the hearings relating to the infrastructure capacity constraints identified in the Greater Norwich Development Partnership Water Cycle Study. I am confident that the capacity issues which have been identified could be resolved through early discussion and joint working with Anglian Water Services Limited and the Environment Agency (EA) without impacting on the delivery of the housing and associated development. I note both the EA and Anglian Water state that the quantum of growth proposed at Long Stratton could be accommodated [G12]. However, given the importance of the issue, I consider that a modification **(MM17)** is required. This is to emphasise the importance of developers and the Council working closely with both the EA and Anglian Water, as early as possible, to provide a solution to capacity issues. Following public consultation, in the interests of clarity I have slightly altered the wording of this modification.
51. I note that Policy LNGS1 would be implemented in conjunction with Policy DM4.2 of the DMPD. This provides a robust development management policy in relation to Sustainable Drainage and Water Management, which includes the requirement for a sewerage capacity assessment for all developments.

52. There is no evidence before me to suggest that the reference to the occupation of no more than 1000 dwellings will prove an obstacle to development moving forward, or that waste water issues could not be overcome through early engagement with the relevant parties and implementation of the policies of the DMPD.

### *Funding*

53. It is a long standing objective of the Council, and the local community who have campaigned for 70 years<sup>15 16</sup> that a bypass should be built. In addition, the developers promoting the allocation acknowledge *that the development requires a bypass and the bypass requires development*<sup>17</sup>.
54. The general location, scale, and composition of development are set by the adopted Core Strategy [B1]. Within the Inspectors' Report into the Joint Core Strategy reference is made to the developer being '*incentivised*' to bring forward his land to meet the JCS proposals, including provision for other necessary infrastructure contributions and affordable housing<sup>18</sup> and within the JCS<sup>19</sup> the bypass is clearly envisaged to be funded by the development<sup>20</sup>. Long Stratton's identification as a growth area of at least 1800 houses within the JCS was predicated on the provision of a developer funded bypass, without which significant housing development could not proceed<sup>21 22</sup>.
55. Together with the housing at Long Stratton, the bypass is identified as a significant site for early delivery by the Greater Norwich Growth Board. The Long Stratton bypass is identified as a major transport scheme within the Greater Norwich City Deal as a means of unlocking housing growth [D5] and the proposed development of the bypass and housing, which is provided for within Policy LNGS1 of the LSAAP as submitted, is listed as a significant site for early delivery within the May 2015 Greater Norwich Infrastructure Plan [G9], with the bypass identified as a separate transport project.
56. The Council's Regulation 123 list (the contents of which are not for me to determine) makes explicit that 'part' of the Long Stratton bypass is to be funded through S106 obligations, S78 of the Highways Act, other legislation or secured through condition, and the rest by CIL funding. The Community Infrastructure Levy Charging schedule [D7] was adopted by South Norfolk following the adoption of the JCS. In setting the Levy rates the Examining Inspector took into account the significant infrastructure costs associated with large scale greenfield developments [B92]. The Community Infrastructure Levy: Background and Context document [H9] sets out the approach to Long Stratton.
57. The Plan as submitted sets out an approximate 50/ 50 split in the funding of

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<sup>15</sup> Document G13

<sup>16</sup> Paragraph 81 [H10]

<sup>17</sup> Written Statement on behalf of Norfolk Land Limited/ Norfolk Homes Limited Matter 8: Supporting Infrastructure June 2015 paragraph 5.44

<sup>18</sup> Document H10 Paragraph 85

<sup>19</sup> Document B1: Appendix 8

<sup>20</sup> Document B1 Paragraph 6.55

<sup>21</sup> Document B1 Paragraph 6.19

<sup>22</sup> Document H10 Paragraph 82

the bypass between the private and public sector, and refers to specific elements of the bypass and other infrastructure to be funded through a combination of mainstream public sector funding, direct developer funding, and pooled CIL.

58. However, in the absence of detailed evidence to inform the design of the bypass, there is no clear rationale as to how the approximate 50/50 split of funding was arrived at, as the costs of the bypass, and the relative contributions of the public and private sector to the funding of the bypass are as yet unknown.
59. It is not my role to consider in detail how the 'part'<sup>23</sup> of the cost of the bypass to be funded by the private sector is to be calculated. However, to ensure that the plan is sound, and consistent with the JCS, the wording of the supporting text of LNGS1 should be amended. This is to make clear that the delivery of the bypass is necessary and directly related to the housing and that, without it, a significant proportion of the housing could not be built.
60. The precise funding, phasing and delivery arrangements for the bypass should be established through the master planning of the allocation within the parameters set by the JCS, Policy LNGS1 as proposed to be modified, and the Council's Regulation 123 List, supported by detailed transport and other evidence which will influence the design costs of the bypass. However, in order to ensure consistency with the JCS the developer would be responsible for providing a substantive element of the funding, as without a bypass, only limited development could take place.
61. In addition, it should be recognised that the bypass should be designed, not only to overcome transport impacts which will be considered through detailed transport evidence, but also to contribute to improving the broader environment of Long Stratton by reducing through traffic, and providing economic benefits to the wider area through reducing congestion. Reference should also be made to the public sector's commitment to facilitating its early delivery.
62. The original developer led proposal for housing and a bypass, promoted through the JCS, has now altered to include development to the north west of the village. Whilst the exact location of the housing and bypass was not set in the JCS, Policy LNGS1, as submitted, will require a greater level of infrastructure than that envisaged when the JCS was being examined, for example, the delivery of the Swan Lane link road and higher levels of Green Infrastructure.
63. Nonetheless, in the context of the public sector commitment to the delivery of the allocation, which includes low cost finance available to both the private and public sector, as well as mainstream funding, I am confident that there are no significant barriers to the accessing of funding to deliver the bypass and other infrastructure or that its costs would undermine the viability and delivery of the housing. Therefore, subject to the main modifications set out below, notwithstanding that the exact apportionment of costs between the developers and public sector has not been decided, there is a reasonable prospect that a

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<sup>23</sup> As referred to in the Regulation 123 list

developer led bypass, and other infrastructure required to deliver the growth set out in the JCS can be funded and delivered within the Plan period.

64. Therefore, main modification **(MM5)** is necessary. However, in response to the recent consultation relating to the main modifications, I have altered the wording of **(MM5)** to refer to, *A substantive element of funding*, rather than, *The substantive element of funding*. This is because in the absence of a detailed scheme, it would be inappropriate to prejudge the split in costs.
65. Main modifications **(MM23 and MM27)** are necessary to provide clarity as to the approach to the funding of infrastructure and its delivery, where this has not been identified within the LSAAP, and makes reference to the up to date position relating to CIL rates. Main modification **(MM18)** sets out how development at the extension to the Tharston Industrial Estate should contribute to the delivery of infrastructure.
66. In addition, main modifications **(MM10, MM11 and MM16)** are required to Policy LNGS1 to set out delivery arrangements, and to emphasise the function of the bypass as a strategic road connection.

**Issue 4- Whether the levels of employment land, and locations are appropriate and justified by evidence and will result in sustainable development.**

67. The JCS does not set out the level of employment land that would be appropriate to be provided at Long Stratton. At the hearing sessions the Council provided me with evidence [H2] to justify the 12 hectares of additional employment land proposed within the LSAAP. This was based on a calculation of the ratio of employment land to existing population, which was then applied to levels of new housing. Given the objective set out in the JCS to increase the self-containment of the settlement<sup>24</sup> an additional 2.5 ha of employment land was included. This appears commensurate with the levels of housing growth envisaged, and the objective that Long Stratton should build on its existing employment opportunities.
68. As submitted the LSAAP identified an extension to the Tharston Industrial Estate and two indicative locations for employment uses.
69. In order to provide sufficient flexibility in master planning the strategic allocation, Policy LNGS1 should be revised in line with modification **(MM6)**. This would provide for an appropriate and flexible mechanism to integrate employment uses successfully into the mixed use allocation at Long Stratton. However, it is important that further flexibility is not introduced to undermine the delivery of employment uses by allowing developments such as retail, or care homes for which provision is made in other policies of the Plan, on land which is required for B1, B2 or B8 uses as defined by the Use Classes Order. I am content that adequate flexibility is contained within **(MM6)** and that applications relating to sui generis uses would be considered on their merits.

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<sup>24</sup> Policy 10 of the JCS.

**Issue 5 – Whether the LSAAP provides a positive framework relating to the historic environment consistent with Paragraph 126 of the Framework.**

70. The LSAAP is part of the wider development plan for South Norfolk. As such policy DM4.10 of the DMPD provides a detailed policy relating to heritage matters which would be used when determining planning applications at Long Stratton, together with Policy 2 of the JCS and the Framework. Consequently, Policy LNGS5, which contains little detail, is redundant and to ensure effectiveness it should be deleted. However, Long Stratton has a rich historic heritage. Consequently, it is vital in extending the settlement that a positive approach is taken to heritage matters. Therefore, to ensure that the approach taken is sound and consistent with the Framework the following modifications are required to emphasise the importance of Long Stratton's heritage assets and to avoid duplication with the DMPD (**MM15, MM20, MM21 and MM28**).

**Issue 6- Whether the remaining policies accord with the Core Strategy, are consistent with other development plan policies, are proportionate, and appropriately reflect national policy and guidance.**

*Town Centre Policy*

71. Policy LNGS3 set out a policy for development within the town centre. A modification is required to tighten the language to provide certainty when determining planning applications. Following my site visit it was clear that the primary shopping area extended too far to the north and so would undermine the vitality of the town centre by including residential uses which did not contribute to the vitality and viability of the town centre. Consequently modification (**MM19**) is required.

*Connectivity*

72. As submitted the LSAAP does not provide for adequate links for cyclists and pedestrians from villages and settlements outside of the boundary of the LSAAP. Consequently, modification (**MM24**) is required.
73. In addition, to ensure a prosperous rural economy it is important that the broadband connections provided for new developments are of a high quality. Therefore, modification (**MM25**) is required.

**Policies Map**

74. The Council has provided a revised Policies Map incorporating the changes referred to in paragraphs 21 to 71 above, through Appendix B. This shows how, in order for the relevant policies to be effective, the policies map should be amended in line with Appendix A on adoption.

**Assessment of Legal Compliance**

75. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. As submitted, the document failed to comply with Article 8 (5) of the 2012 Regulations, in that it did not identify the adopted plan policies which its policies were intended to supersede. This deficiency is rectified by modification (**MM31**).

76. Subject to this modification the Plan meets the relevant legal requirements.

<b>LEGAL REQUIREMENTS</b>	
Local Development Scheme (LDS)	The Long Stratton Area Action Plan has been prepared in accordance with the approved LDS February 2015.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in February 2007 and consultation has been carried out in compliance with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM).
Sustainability Appraisal (SA)	SA has been carried out and updated at each stage of plan preparation including the main modifications stage.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report October 2013 sets out why AA is not necessary.
National Policy	The Area Action Plan complies with national policy except where indicated and modifications are recommended.
2004 Act (as amended) and 2012 Regulations.	The submitted Area Action Plan complies with the Act and the Regulations with the exception of Regulation 8 (5) but that is a matter which can be remedied ( <b>MM31</b> ).

## **Overall Conclusion and Recommendation**

77. The Plan has a number of deficiencies in relation to soundness and legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
78. The Council has requested that I recommend main modifications to make the Plan sound and legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in Appendix A the Long Stratton Area Action Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*Louise Nurser*

Inspector

This report is accompanied by the Appendix A which contains the Main Modifications and Appendix B: Consequential amendment to mapping following Main Modifications.

## Appendix A– Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Proposed Modification
MM1	8	1.15 and 1.16	<p><i>Delete the existing paragraphs 1.15 and 1.16 and replace with:</i></p> <p><u>The JCS sets out the housing requirement from commitments and allocations and the Site Specific Allocations and Policies Document, Wymondham Area Action Plan, Long Stratton Area Action Plan and Cringleford Neighbourhood Plan (taking into account the Development Management Policies Document) include policies and allocations to ensure that this is met.</u></p>
MM2	22	Long Stratton – a Location for Major Growth, new paragraph 5.4 & new Appendix 4	<p><i>Add new paragraph after existing paragraph 5.3 :</i></p> <p><u>Long Stratton is part of the Norwich Policy Area (NPA) within South Norfolk and the trajectory illustrating housing delivery in line with Joint Core Strategy requirements is shown in Appendix 4.</u></p> <p><i>Add housing trajectory for the Norwich Policy Area at Appendix 4.</i></p>
MM3	23, 28, 29 & 52	5.5, 5.7 and 12.2	<p><i>Amend fourth bullet point in existing paragraph 5.5:</i></p> <ul style="list-style-type: none"> <li>• The shorter route will not involve a major new roundabout at Hempnall Crossroads (the A140/B1135/B1527 junction), which will be dealt with separately by a <del>simpler roundabout</del> <u>junction improvement</u> scheme; and</li> </ul> <p><i>Amend existing paragraph 5.7:</i></p> <p>Whilst improvements to the Hempnall Crossroads are not specifically mentioned in JCS Policy 10, they are linked to the bypass in the JCS Infrastructure Framework. Over time improvements have been made to the junction within the existing highway, but further growth at Long Stratton will require a <del>roundabout</del> <u>more significant improvement</u> to be implemented. A <del>new roundabout</del> <u>junction improvement</u> at</p>

Ref	Page	Policy/ Paragraph	Proposed Modification
			<p>Hempnall Crossroads will need to be agreed with Norfolk County Council and delivered early in the phasing of development.</p> <p><i>Additional bullet point to the ‘Masterplan and Phasing Plan’ section of Policy LNGS1:</i></p> <ul style="list-style-type: none"> <li>• <u>Delivery of a junction improvement at Hempnall Crossroads early in the development;</u></li> </ul> <p><i>Amend the first bullet of the ‘Transport section of existing Policy LNGS1:</i></p> <ul style="list-style-type: none"> <li>• Proportionally contribute to the delivery of a <u>roundabout junction improvement at Hempnall Crossroads early in the development;</u></li> </ul> <p><i>Amend second bullet point of existing paragraph 12.2:</i></p> <ul style="list-style-type: none"> <li>• Other appropriate transport infrastructure including a <u>roundabout junction improvement at Hempnall Crossroads and improved public transport;</u></li> </ul>
MM4	23	5.8	<p><i>Amend existing paragraph 5.8:</i></p> <p>Development of 1,800 dwellings within Policy LSNGS1 will secure delivery of the bypass plus other necessary infrastructure to support growth. For the level of development proposed direct access from the A140 from more than one point will be required. <del>It will be essential for</del> <u>The LNGS1 development and the bypass should to come forward as a single proposal. The planning application(s) will includeing</u> the comprehensive masterplan required by Policy LSNGS1, with the bypass (at least) dealt with in detail.</p>
MM5	24,25 & 35	5.9, 5.10, 5.11 & 5.14	<p><i>New paragraphs to replace the existing paragraphs 5.9, 5.10 and 5.11:</i></p> <p><u>The JCS (Policy 10 and Infrastructure Framework project T3) identifies that the bypass is a direct requirement of growth in Long Stratton and a pre-requisite for the scale of growth identified for the settlement. Given that the bypass is necessary in order to enable housing development to take place on LNGS1, a substantive element of funding is expected to come from the developer.</u></p> <p><u>As well as facilitating the development of LNGS1, the objectives of the bypass include:</u></p>

Ref	Page	Policy/ Paragraph	Proposed Modification
			<ul style="list-style-type: none"> <li>• <u>improving the environment in Long Stratton by significantly reducing through traffic; and</u></li> <li>• <u>providing economic benefits by reducing congestion on the principal road linking Norwich and Ipswich, thus supporting the economic aspirations of the New Anglia Local Enterprise Partnership (LEP).</u></li> </ul> <p><u>The masterplanning of LNGS1 and the supporting detailed transport evidence will establish the design of the bypass. This will take into account the requirement for the bypass to fulfil a number of roles, including: access to substantial areas of new housing and employment; forming a strategic route; and providing the boundary to the east of the settlement. This will provide the context for the precise funding and delivery arrangements. In advance of the detailed design, the AAP does not set an alignment for the bypass but a broader safeguarded corridor within which the bypass can be delivered.</u></p> <p><u>The public sector is committed to the construction and early delivery of the bypass to enable the housing growth, environmental improvements and reduction in congestion. The bypass is included in the Greater Norwich Growth Programme which will help co-ordinate and manage the timely delivery over strategic infrastructure across South Norfolk, Norwich and Broadland. Funding mechanisms available to implement the Growth Programme include direct grant, developer funding, pooled CIL and reduced rate borrowing which is available to the developer and the local authorities through the Greater Norwich City Deal. The mechanisms for collecting CIL are set out in the 'South Norfolk Council CIL Charging Schedule' which can be viewed at <a href="http://www.south-norfolk.gov.uk/planning/5191.asp">http://www.south-norfolk.gov.uk/planning/5191.asp</a>.</u></p> <p><del>5.9 Part of the bypass will form essential site access for new dwellings, employment and commercial development. This part of the road infrastructure would be delivered as an integral element of the early phases of housing delivery, secured through a Section 38 Agreement (S38), which is an agreement that ensures public roads which are built as part of a development (rather than off-site) are designed and built to adoptable standards.</del></p> <p><del>5.10 The remainder of the bypass is likely to be local authority led and will be funded principally using Community Infrastructure Levy (CIL) monies. The mechanisms for collecting CIL are set out in the 'South Norfolk Council CIL Charging Schedule' and the supporting 'CIL Background and Context', which can be viewed on the GNDP website at <a href="http://www.gndp.org.uk/our-work/cil/">http://www.gndp.org.uk/our-work/cil/</a>. Other funding sources</del></p>

Ref	Page	Policy/ Paragraph	Proposed Modification
			<p><del>may also be available, however, including a £60m Greater Norwich City Deal loan fund to deliver infrastructure and the New Anglia LEP's Growing Places fund. The Greater Norwich Infrastructure Plan, which was published for the first time, in interim form, in June 2014, will co-ordinate and manage the delivery of strategic infrastructure to support growth across the three districts of South Norfolk, Norwich and Broadland.</del></p> <p><del>5.11 The funding split between the access road element delivered by the developer (S38) and the additional bypass length delivered by the local authorities is approximately 50/50.</del></p> <p><i>Amendment to existing paragraph 5.14:</i></p> <p>The bypass will need to be completed prior to the occupation of the 250<sup>th</sup> dwelling to address any highway implications as a result of the planned growth. <del>The local authority led element of the bypass, including the southern connection to the A140, will be procured by the local authorities (South Norfolk Council and Norfolk County Council) and timely delivery agreed with the developers. Improvements to ...</del></p> <p><i>Amendment to existing paragraph 7.8:</i></p> <p>Local authorities would need to procure these improvements <del>in parallel with the publicly funded element of the bypass, to be delivered prior to the opening of the bypass once the bypass is complete.</del></p>
MM6	25, 27 & 28	LNGS1, new supporting text to LNGS1 and Policies Map	<p><i>Add new section following existing paragraph 5.15:</i></p> <p><b><u>Employment Opportunities and Economic Growth</u></b></p> <p><u>The 9.5 hectares of employment development within LNGS1 will be suitable for uses within Use Classes B1, B2 and B8 as defined by the Use Classes Order. The delivery of this employment land is necessary to ensure the long term sustainability of Long Stratton. Ancillary and complementary job creating uses may be appropriate subject to consideration against the development management policies of the South Norfolk Local Plan, but these will not contribute towards the minimum 9.5 hectare requirement to be delivered as part of the LNGS1 allocation.</u></p>

Ref	Page	Policy/ Paragraph	Proposed Modification
			<p><i>Amend the last two sentences of existing paragraph 5.22:</i></p> <p>The employment element will be <del>close to existing residential areas and offers the benefit of reducing</del> <u>masterplanned as part of a comprehensive development, aiming to maximise opportunities for residents to walk and cycle to work and reduce traffic</u> through Long Stratton, particularly for commercial vehicles. Employment units <del>will</del><u>could</u> also benefit from a more prominent/visible position adjacent to the bypass corridor.</p> <p><i>Modify policy LNGS1 by removing the geographic illustration of employment locations on the Policies Map as set out in Appendix 2 and amend the ‘Employment opportunities and Economic Growth’ section of existing Policy LNGS1:</i></p> <p><u>The development will provide for a range of employment opportunities, as defined by use classes B1, B2 and B8 of the Use Classes Order, on a minimum area of 9.5 hectares. and economic growth within use classes B1, B2 and B8 will be supported in the vicinity shown on the Policies Map. Uses associated with, or ancillary to, these use classes may also be acceptable. The phasing, design, size and location of the site(s) will be considered as an intrinsic part of the masterplan for the wider allocation in order to provide suitable, attractive and deliverable employment sites. Development will be permitted where it will:</u></p> <ul style="list-style-type: none"> <li>• <del>Site to be masterplanned as part of the housing allocation to minimise conflict between uses and to give good</del> <u>Have direct access to the bypass A140 (particularly for any uses generating significant volumes of traffic and/or HGV movements) or good access which does not conflict with existing or proposed housing;</u></li> <li>• <u>Avoid vehicular access through the town centre;</u></li> <li>• <u>Include appropriate design and landscaping, in particular where employment is located on off-land to the south-east to consider the or on an approach/gateway to Long Stratton from the south;</u></li> <li>• <u>Be designed to avoid and if necessary mitigate any potential conflict between employment uses and housing; and</u></li> <li>• <del>To Maximising the</del> <u>Provide significant</u> opportunities for local residents to walk and cycle to work.</li> </ul>
MM7	25	Supporting text to LNGS1	<p><i>Add new heading and paragraph after existing paragraph 5.15:</i></p>

Ref	Page	Policy/ Paragraph	Proposed Modification
			<p><b><u>Supporting Infrastructure</u></b></p> <p><u>The level of development at Long Stratton will require a range of supporting infrastructure to ensure development is sustainable, this is likely to include:</u></p> <ul style="list-style-type: none"> <li>• <u>Primary School provision as set out in LNGS1</u></li> <li>• <u>Expansion of Long Stratton High School</u></li> <li>• <u>Expansion of Long Stratton Library (approx. 130 sq.m)</u></li> <li>• <u>A range of house types, in line with JCS policy, including an element of Housing with Care.</u></li> </ul> <p><u>The Council will support early engagement between Norfolk County Council Children’s Services and Long Stratton High School with regard to developing a masterplan for the timely expansion of the school to accommodate the level of housing growth.</u></p>
MM8	25, 26, 28 & 42	LNGS1 and LNGS6 5.17, 5.18, 8.9 and 8.11.	<p><i>Amend the first sentence of existing paragraph 5.17:</i></p> <p><u>The Green Indicative Green Infrastructure map Plan at Appendix 3 identifies the green infrastructure necessary to deliver the requirements of the AAP. However, whilst the location of the Green Infrastructure is shown as indicative on the Plan, the requirement for Infrastructure which achieves the same outputs is a necessity.</u></p> <p><i>Amend existing paragraph 5.18</i></p> <p><del>Green infrastructure will need to include opportunities for strategic public links across the bypass to existing rights of way and develop circular walks linking Long Stratton to Norfolk Trails. Green Infrastructure will also be important to maintain migration routes of local wildlife and creating new areas for wildlife including two new commons<sup>6</sup>. These elements are covered in Policy LNGS1 requirements. Additional consideration should be given to the following GI projects, which could be delivered over the longer term through CIL, projects of existing wildlife/conservation bodies or community groups</del> <u>Development of the LNGS1 allocation will need to consider:</u></p> <ul style="list-style-type: none"> <li>• <u>A primary public crossing<sup>6</sup> between Long Stratton and the wider countryside across the proposed bypass [LS1];</u></li> <li>• <u>Secondary public crossings<sup>6</sup> for pedestrians from Long Stratton to the countryside across the bypass [LS2];</u></li> <li>• <u>A newly created common<sup>6</sup>, primarily for public use as a ‘gateway’ to Long Stratton from the east [LS3];</u></li> <li>• <u>A newly created habitat of a common<sup>6</sup> with ponds for</u></li> </ul>

Ref	Page	Policy/ Paragraph	Proposed Modification
			<p><u>protected species with some restricted public access. This will be bisected by the bypass and must have a culvert under the road to avoid dividing a population of protected species [LS4];</u></p> <p><u>Additional consideration should be given to the following GI projects, which could be delivered over the longer term through CIL, projects of existing wildlife/conservation bodies or community groups:</u></p> <ul style="list-style-type: none"> <li>• Improvements to public access links from Long Stratton to existing common land [LS5];</li> <li>• Securing public access to a public footpath between Wacton Common and Long Stratton [LS6];</li> <li>• Improve the quality of local County Wildlife Sites to mitigate for increased visitor pressure [LS7];</li> <li>• Improvements to public access between Long Stratton and Norfolk Trails and promotion of circular walks to encourage health and wellbeing [within the area of LS8 and LS9].</li> </ul> <p><u>The development of the bypass, housing, employment sites and other supporting infrastructure should avoid the use of the best and most versatile agricultural land (Grades 1, 2 and 3a), or making the agricultural use of undeveloped areas of such land unviable</u></p> <p><i>New Footnote 6 containing definitions of new commons and primary and secondary public crossings:</i></p> <p><u><sup>6</sup> The reference to newly created commons does not refer to “commons” in the legal sense, but to the nature and layout of the open space, reflecting the character of the historic commons, rather than being laid out as formal recreation spaces. The reference to primary public crossing relates to the fact that this crossing would need to be provided as part of the proposed central junction, shown at 3 on the Policies Map, whilst the secondary public crossings need not be associated with a vehicular junction.</u></p> <p><i>Amend existing Policy LNGS1 by the deletion of the second bullet point under ‘Open Space and Green Infrastructure’</i></p> <ul style="list-style-type: none"> <li>• <del>New development must incorporate the following elements of Green Infrastructure as identified on the Green Infrastructure Map in Appendix 3:</del> <ul style="list-style-type: none"> <li>○ <del>A primary public crossing between Long Stratton and the wider countryside across the proposed bypass [LS1];</del></li> <li>○ <del>Secondary public crossings for pedestrians from Long Stratton to the countryside across the bypass [LS2];</del></li> </ul> </li> </ul>

Ref	Page	Policy/ Paragraph	Proposed Modification
			<p><del>○ A newly created common, primarily for public use as a 'gateway' to Long Stratton from the east [LS3];</del></p> <p><del>○ A newly created habitat of a common with ponds for protected species with some restricted public access. This will be bisected by the bypass and must have a culvert under the road to avoid dividing a population of protected species [LS4];</del></p> <p><i>Amend existing paragraph 8.9</i></p> <p>It will be essential to link elements of the environment as development occurs, and the policy requirements for relevant housing and employment sites will help to ensure this Green Infrastructure is delivered, adding to the quality and quantity of green infrastructure available in the area. All future developments in and around Long Stratton will have regard to the enhancement of Green Infrastructure, and will, <u>where appropriate</u>, contribute to its provision</p> <p><i>Amend existing Policy LINGS6</i></p> <p>New development in Long Stratton will be required to maintain, protect and enhance green infrastructure, and developers will be expected to contribute towards green infrastructure <u>requirements</u> <del>enhancements through CIL and/or s106 contributions.</del></p> <p>New developments will be required to <u>enable and where appropriate</u> <del>provide ecological links to the nearest green infrastructure and consider mitigating for any barriers such as new roads.</del></p> <p><del>In particular it will be important for new development to consider the following:</del></p> <ul style="list-style-type: none"> <li>• <del>improved</del> <u>safe</u> public access to the countryside <u>and between Long Stratton and surrounding villages;</u></li> <li>• <del>improved habitat connectivity;</del></li> <li>• retention of habitat features and creation of new habitats;</li> <li>• <u>functional ecological connections between Priority (Section 41) species and habitats<sup>9</sup> and designated sites in the vicinity of Long Stratton;</u></li> <li>• <u>an enhanced landscape setting for Long Stratton which reflects distinctive local landscape character, including in particular the landscape character and qualities of the existing historic commons;</u></li> <li>• improved recreational provision to alleviate visitor pressure on sensitive areas</li> <li>• <u>sensitively designed mitigation of any barriers to this green</u></li> </ul>

Ref	Page	Policy/ Paragraph	Proposed Modification
			<p><u>infrastructure provision; and</u></p> <ul style="list-style-type: none"> <li>• <u>protection of the best and most versatile agricultural land (Grades 1, 2 and 3a)</u></li> </ul> <p>All new developments should <del>aspire to</del> <u>deliver a net biodiversity gain and any planning proposals should be accompanied by detailed ecological assessment where appropriate.</u> The cumulative impact of developments on biodiversity assets should be <del>considered</del> <u>taken into account as part of the planning application process.</u></p> <p><i>Add footnote following existing PolicyLNGS6</i></p> <p><sup>9</sup>Species and habitats which are listed under Section 41 of the 2006 Natural Environment and Rural Communities (NERC) Act.</p>
MM9	26	New paragraph to the supporting text for LNGS1	<p><i>Add new paragraph after existing paragraph 5.21:</i></p> <p><u>Although these sites do not contribute to the JCS requirement for at least 1,800 new homes in Long Stratton, they do form part of the overall delivery of housing to meet the full JCS requirement. Consequently, applications to renew or vary these permissions will be supported in principle, provided that they do not diverge significantly from the permission(s) originally granted; applications will be assessed against Development Management Policies Document DM1.5.</u></p>
MM10	27	LNGS1	<p><i>Amend the third paragraph of existing Policy LNGS1 to:</i></p> <p>The developer(s) of the Allocation will be required to ensure <u>the delivery of</u> the following:</p>
MM11	27 & 28	LNGS1, Policies Map & Indicative Green Infra-structure Plan	<p><i>Amend the first, second and third bullet points under 'Masterplan and Phasing Plan', modify Policy LNGS1 by amending the geographic illustration of the policy on the Policies Map as set out in Appendix 2 to provide a broad corridor in which the bypass could be constructed and extend the Development Boundary to incorporate the corridor and amend the Indicative Green Infrastructure Plan (Appendix 3) to illustrate the wider corridor:</i></p> <ul style="list-style-type: none"> <li>• Before any housing is permitted on this allocation there shall be a phasing and delivery mechanism that will secure the delivery of the bypass agreed <u>with</u> the Local Planning and Highway Authority;</li> </ul>

Ref	Page	Policy/ Paragraph	Proposed Modification
			<ul style="list-style-type: none"> <li>• Delivery of the bypass (<del>jointly by the developer(s) and local authorities</del>) before the occupation of the 250<sup>th</sup> new dwelling in Long Stratton, unless clear evidence is provided to demonstrate that the occupation threshold is unviable and a variation to this threshold which meets the other requirements of the AAP and is acceptable in highways terms is agreed by the Local Planning Authority;</li> <li>• Delivery of a bypass within the identified corridor, <del>unless an alternative route which meets the same objectives is agreed in writing with the Local Planning and Highway Authorities;</del></li> </ul>
MM12	28	LNGS1	<p><i>Additional bullet point under 'Enhanced Facilities' of existing Policy LNGS1:</i></p> <p>Enhanced Facilities</p> <ul style="list-style-type: none"> <li>• Site to include an element of mixed-tenure Housing with Care;</li> <li>• <u>Site to include an element of self-build if demand for such housing is demonstrated.</u></li> <li>• Provision of a serviced ...</li> </ul>
MM13	28	LNGS1	<p><i>Amend the second bullet point under Enhanced Facilities of existing Policy LNGS1:</i></p> <ul style="list-style-type: none"> <li>• Provision of a serviced site of at least <del>4.7</del> <u>2.0</u> hectares for a new two-form entry primary school and 60 place pre-school (to be provided at no cost to the local authority<del>ies</del>);</li> </ul>
MM14	28	LNGS1	<p><i>Amend the first bullet point under Open Space and Green Infrastructure of existing Policy LNGS1:</i></p> <ul style="list-style-type: none"> <li>• Provision of open space and landscaping in addition to requirement for, <u>including children's playspace and older children/adult open space to be addressed at the time of any application sufficient to meet the needs of residents of the development;</u></li> </ul>
MM15	29	LNGS1	<p><i>Amend the bullet points under Design Principles of existing Policy LNGS1 and delete existing footnote 7:</i></p> <ul style="list-style-type: none"> <li>• <del>Site to be planned in a way that meets the highest standards of design, energy efficiency and affordability, whilst recognising the need to sustain and improve the distinctive character of Long Stratton;</del></li> <li>• Design of development, <u>including the bypass,</u> <del>in</del></li> </ul>

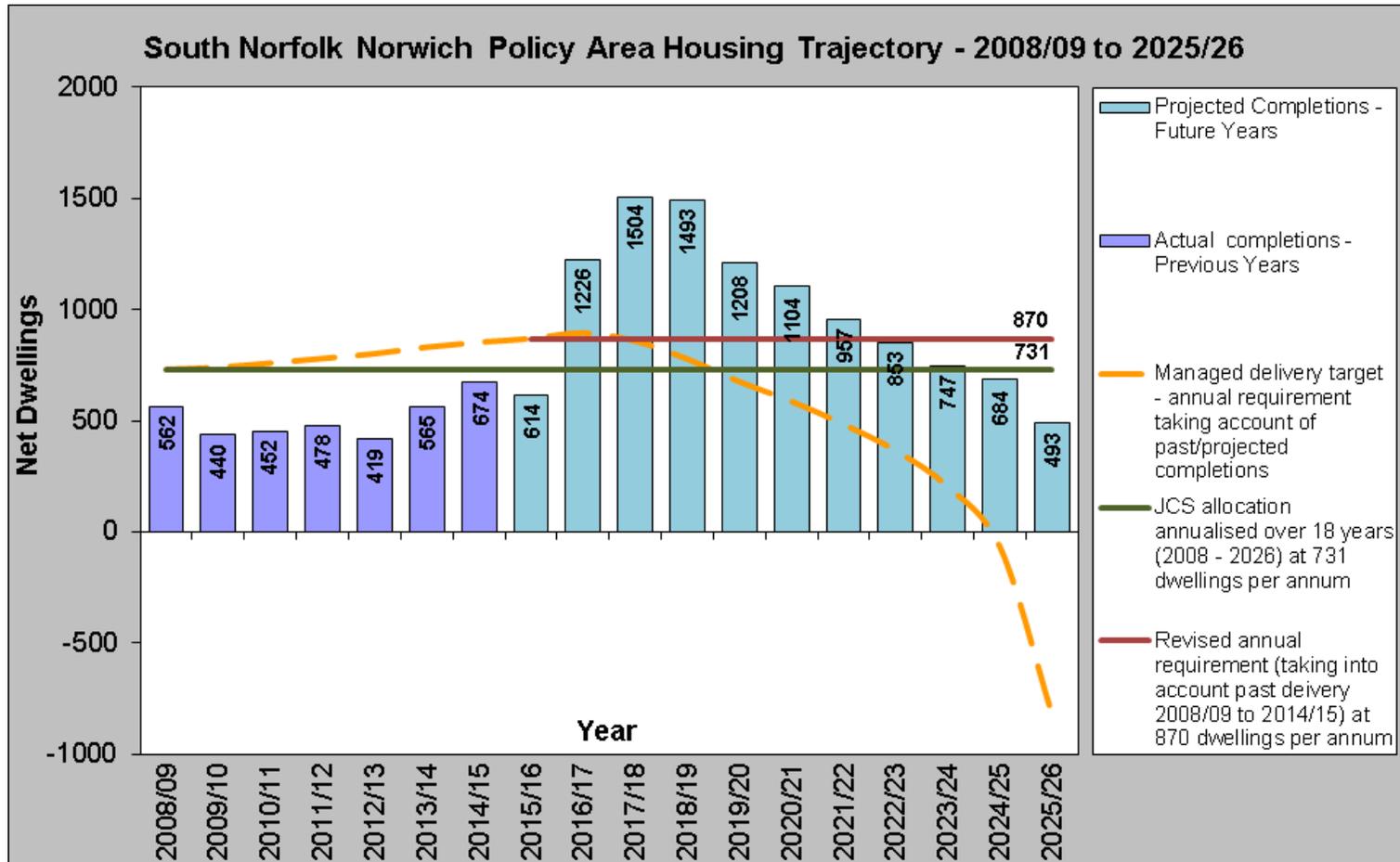
Ref	Page	Policy/ Paragraph	Proposed Modification
			<p><del>accordance with the South Norfolk Place-Making Guide<sup>7</sup>, to recognise the need to sustain and improve the distinctive character of Long Stratton and to be of a scale and form which respects and enhances the Conservation Area;</del></p> <ul style="list-style-type: none"> <li><del>• Design of the development, the bypass and green infrastructure provision to the east of Long Stratton to respect and reflect the key features identified in the Historic Landscape Characterisation and Sensitivity Assessment (Norfolk County Council, 2009<sup>5</sup>);</del></li> <li><del>• The bypass will be designed as an integral part of the wider development in order to achieve a high quality environment;</del></li> </ul> <p><small><sup>7</sup> South Norfolk Place-Making Guide Supplementary Planning Document, September 2012, available at: <a href="http://www.south-norfolk.gov.uk/planning/5287.asp">http://www.south-norfolk.gov.uk/planning/5287.asp</a></small></p>
MM16	29	LNGS1	<p><i>New bullet point under Transport section of existing Policy LNGS1:</i></p> <ul style="list-style-type: none"> <li>• <u>The bypass to function as a strategic road connection as part of the A140;</u></li> </ul>
MM17	29	LNGS1 1.45	<p><i>Amend first bullet point under ‘Site conditions and constraints’ of existing Policy LNGS1 and identical consequential change to existing paragraph 1.45:</i></p> <p><u>As a priority</u>, foul water strategy to be agreed with Anglian Water and the Environment Agency, regarding the nature and timing of capacity improvements and upgrades to the foul water public sewer network and Water Recycling Centre. No more than 1,000 dwellings occupied prior to written agreement with Anglian Water and the Environment Agency regarding solutions to current capacity constraints;</p>
MM18	32	LNGS2	<p><i>Amend the last bullet point of existing Policy LNGS2:</i></p> <ul style="list-style-type: none"> <li>• To contribute to the delivery of infrastructure, including the bypass and other transport improvements, <del>through the payment of CIL and/or S106.</del></li> </ul>
MM19	36	LNGS3 and Policies Map	<p><i>Amend the first paragraph of existing Policy LNGS3:</i></p> <p>In the defined Town Centre boundary for Long Stratton as shown on the Policies Map, development proposals for shopping, food and drink and leisure uses (Use Classes A1, A2, A3, A4, A5 and D2 as defined in the Town and Country Planning (Use Classes) Order 1987, as amended) will be <u>encouraged permitted</u>, together with other defined main town centre uses (falling within Classes D1, B1 and appropriate sui</p>

Ref	Page	Policy/ Paragraph	Proposed Modification
			<p>generis class).</p> <p><i>Amend the geographic illustration of policy LNGS3 on the Policies Map (Appendix 2) and to remove the Queen's Head Public House and properties further north from the Primary Shopping Area.</i></p>
MM20	36	LNGS3	<p><i>Amend the fourth paragraph of existing Policy LNGS3:</i></p> <p>As part of any proposals opportunities should be sought to enhance the character and appearance of the town centre, taking into account <del>Policy LNGS5</del> and the 2013 Conservation Area Statement.</p>
MM21	40 & 58	LNGS5	<p><i>Delete existing Policy LNGS5 (and corresponding key indicators from the Monitoring Framework) and amend paragraph 8.3 to read:</i></p> <p>Deficiencies with more recent developments, including unsympathetic infill, have contributed to the dilution of the character of the historic core of the village. Further erosion of the key characteristics of Long Stratton's identity must be avoided. <u>The AAP does not contain a bespoke policy relating to preserving and enhancing the historic character of Long Stratton, as this is covered by policies in the Development Management Policies Document (specifically DM4.10), JCS Policy 2 and the NPPF.</u> Further advice about preserving and enhancing the character of Long Stratton can be found in the Council's 2012 Place-Making Guide Supplementary Planning Document (SPD) and the 2013 Conservation Area Statement for Long Stratton.</p>
MM22	45	LNGS7	<p><i>Amend second bullet point of existing Policy LNGS7:</i></p> <ul style="list-style-type: none"> <li>it affects only a small part of the site <u>which cannot be used for pitch sports</u> and does not prejudice the recreational use of the site;</li> </ul>
MM23	46	LNGS8	<p><i>Amend existing Policy LNGS8:</i></p> <p>The Council will require developers to provide new on-site public open space as part of the allocation LNGS1 in Long Stratton <del>using the Council's 1994 recreational open space standards</del> <u>commensurate with the level of development proposed.</u></p> <p>New development must provide green infrastructure to help</p>

Ref	Page	Policy/ Paragraph	Proposed Modification
			create a network for safe movement around the urban environment of Long Stratton and for non-vehicular access to the surrounding countryside, to strengthen informal recreation.
MM24	49	LNGS10	<p><i>Amend first paragraph of existing Policy LNGS10:</i></p> <p>Development will be required to maximise the permeability for pedestrians and cyclists, by improving access to/from existing and new key services and facilities, such as the town centre, schools, medical facilities, leisure facilities/open spaces <u>and employment opportunities, as well as <u>facilitating enhanced connectivity</u> to the wider countryside <u>and surrounding villages.</u></u></p>
MM25	49	LNGS10	<p><i>Amend the third bullet of third paragraph of existing Policy LNGS10:</i></p> <ul style="list-style-type: none"> <li>comprehensive and <u>effective high quality</u> broadband/telecommunications network to support commercial, employment and domestic needs.</li> </ul>
MM26	51 & 61	LNGS11, 11.1	<p><i>Delete existing Policy LNGS11 (and corresponding key indicators from the monitoring framework) and add an additional sentence to paragraph 11.1 to read:</i></p> <p><u>Planning applications will therefore be determined in accordance with the relevant Local Plan policies relating to development inside and outside of Development Boundaries in place at the time.</u></p>
MM27	52	New paragraph after 12.1	<p><i>Additional paragraph following existing paragraph 12.1:</i></p> <p><u>Where additional infrastructure is identified as a direct requirement of development it will be secured through the use of planning conditions, Section 106 Agreement or other legal obligations. Where infrastructure improvements are required that are identified in the Council's Regulation 123 list or where the need for improvement does not principally arise as a result of development in the AAP, the Local Authorities will be responsible for promoting the improvements. In these instances a combination of a proportionate developer contribution (if applicable), CIL and/or local authority funding, including the mechanisms available through the Greater Norwich City Deal, will be used to secure delivery.</u></p>
MM28	52	12.2	<i>Addition to existing paragraph 12.2 below the bullet point list:</i>

Ref	Page	Policy/ Paragraph	Proposed Modification
			<p><u>In addition, developments will contribute to the protection and enhancement of the historic environment of Long Stratton.</u></p>
MM29	52	12.3	<p><i>Amend the first two bullet points of paragraph 12.3 to read:</i></p> <ul style="list-style-type: none"> <li>• Community Infrastructure Levy - Contributions towards strategic infrastructure from all residential and commercial development made through <del>the introduction of an area-wide</del> Community Infrastructure Levy or (CIL). <del>For more information about the CIL please visit</del> <a href="http://www.gndp.org.uk/our-work/cil/">http://www.gndp.org.uk/our-work/cil/</a> <u>The Council has worked jointly to prepare a CIL charging schedule for each of the three Greater Norwich authorities. The charging schedules were examined in October 2012 and CIL adopted from 1 May 2014 in South Norfolk. The residential levy is set at £50 per m<sup>2</sup> (index linked) in the Outer Area, which includes the area covered by this AAP. The full charging schedule can be seen at</u> <a href="http://www.south-norfolk.gov.uk/planning/5191.asp">http://www.south-norfolk.gov.uk/planning/5191.asp</a></li> <li>• Section 106 contributions - <del>Until the CIL is introduced developers will contribute towards the provision of infrastructure through Section 106 agreement. Even when the CIL is introduced</del> Section 106 contributions will continue to be sought for site specific needs.</li> </ul>
MM30	53	Delivering the Plan - new paragraph 12.7	<p><i>Add new heading and paragraph after existing paragraph 12.6 to read:</i></p> <p><b><u>Review of the Plan</u></b></p> <p><u>The Council is committed to an early review of the South Norfolk Local Plan, which has already effectively begun with the preparation of a new Strategic Housing Market Assessment across five Norfolk districts (which is expected to be complete in autumn-2015). For the avoidance of doubt, this will include an early review of secondary education provision across the district. The new or reviewed plan(s) will be adopted within five years of adoption of the 2015 Site Specific Policies and Allocations Document, at the latest.</u></p>
MM31	-	New Appendix 5	<p><i>Add list of currently saved Local Plan policies to be superseded as Appendix 5.</i></p>

**MM2 New Appendix 4**



Note: The 'Revised annual requirement (taking into account past delivery 2008/09 to 2014/15)' does not include the additional buffer, moved forward from later in the plan period, required by NPPF paragraph 47. Including a buffer of 5% would give a revised annual requirement for 2015/16 to 2019/20 of 907 units in the NPA, or with a 20% buffer a requirement of 1,016 units. The Joint Core Strategy Monitoring Report will set out the up-to-date five year supply position, including the appropriate buffer, on an annual basis.

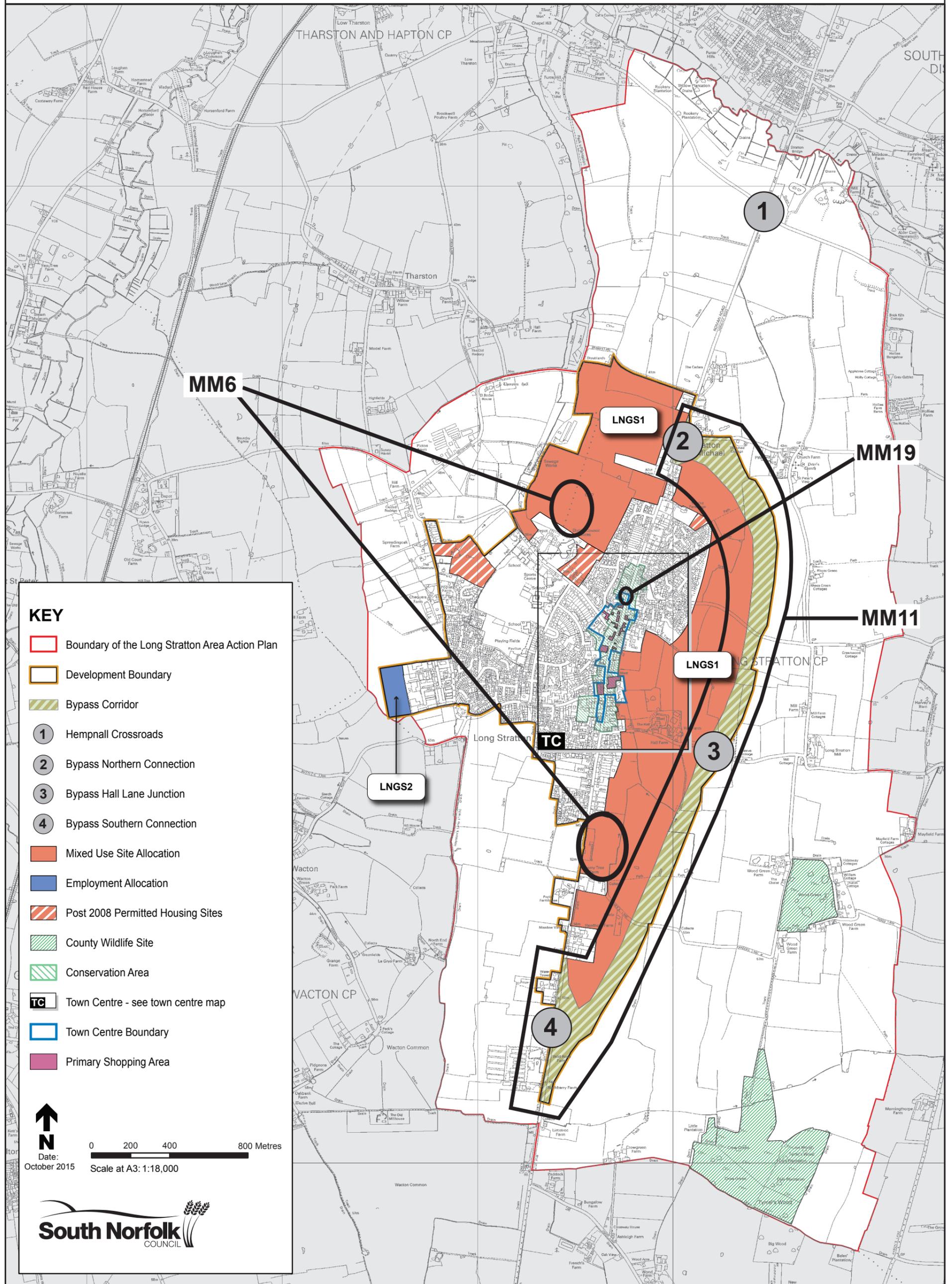
### **MM31 New Appendix 5**

The following is the list of South Norfolk Local Plan 2003 policies which remain in use as of December 2015 and form part of the development plan for South Norfolk and which will be superseded upon adoption of the Long Stratton Area Action Plan.

<u>Policy</u>	<u>Title</u>
<u>LON 2:</u>	<u>Housing allocation north of Lime Tree Avenue, Long Stratton</u>
<u>LON 3</u>	<u>Employment allocation adjacent to the plant depot on Ipswich Road, Long Stratton</u>
<u>LON 4</u>	<u>Developer requirements for employment allocation adjacent to the plant depot on Ipswich Road, Long Stratton</u>
<u>LON 8</u>	<u>Rear servicing provision to new commercial premises in Long Stratton</u>
<u>LON 9</u>	<u>New burial ground site in Long Stratton</u>

Appendix 2

# Long Stratton Area Action Plan, Policies Map



- KEY**
- Boundary of the Long Stratton Area Action Plan
  - Development Boundary
  - Bypass Corridor
  - 1 Hempnall Crossroads
  - 2 Bypass Northern Connection
  - 3 Bypass Hall Lane Junction
  - 4 Bypass Southern Connection
  - Mixed Use Site Allocation
  - Employment Allocation
  - Post 2008 Permitted Housing Sites
  - County Wildlife Site
  - Conservation Area
  - TC Town Centre - see town centre map
  - Town Centre Boundary
  - Primary Shopping Area

↑  
N  
 Date: October 2015  
 Scale at A3: 1:18,000  
  