

## **NORTH NORFOLK LOCAL PLAN HEARING** **MATTER 10**

### **SUPPLEMENTARY STATEMENT IN SUPPORT OF NORFOLK CONSTABULARY REGULATION 19 REPRESENTATIONS**

**At Regulation 19 stage, Norfolk Constabulary made representations regarding the soundness of the Plan. As the requested changes have not been made by NNDC Officers prior to Examination, this Statement has been prepared to amplify points previously made in relation to the changes requested, notably to the policy HC4.**

#### **Background**

This additional Statement does not seek to replicate the detailed information submitted in the Regulation 19 response, but simply to amplify the key points raised regarding the principle of ensuring specific reference is made to Police in policy HC4 and to emphasise that this change has been recognised as necessary at Examination for a Local Plan covering three Local Authority area in Norfolk (including Broadland DC which abuts North Norfolk).

#### **Regulation 19 Plan approach to Infrastructure**

As outlined in the detailed submission provided at Regulation 19 stage, Norfolk Constabulary welcomes the importance placed in section 5.4 of the Local Plan to 'Infrastructure Provision, Developer Contributions'.

The Local Plan recognises that future development within the district will place pressure and demand on existing infrastructure such as schools, open spaces, transport networks, health and community facilities. However, it fails to recognise the same pressure and demands will be placed on police infrastructure requirements. In mitigating additional demand on police resources, there will be a requirement for new development, where necessary, to contribute toward the improvement of existing police infrastructure and facilities, to make development acceptable (in a similar way to schools, health and community facilities, etc).

In response to Norfolk Constabulary's detailed submission at Regulation 19 stage, the Councils argued *'The Council does not consider it necessary to amend the policy or table 4 as requested. The list is not exhaustive and does not prevent a case being made on an appropriate application. In line with the NPPF planning obligations will only be sought where necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonable related in scale and kind to the development. NPPF para 57'*.

Whilst quoting the NPPF, the Council have failed to explicitly consider or respond to paragraph 92 of the Framework (now paragraph 96 of the revised NPPF updated in

December 2023) and other provisions (as set out in the Regulation 19 detailed submission) that justify specific police infrastructure reference in policy HC4.

Justification for Policy Change

The Local Plan in policy HC 1 place significant emphasis on health and well-being. The police play a key role in delivering safe communities, so that crime, disorder and anti-social behaviour (and the fear, worry and anxiety of such activities) does not undermine cohesion and harm the physical and mental health of existing and future residents. This should be explicitly recognised in the Local Plan to ensure that the plan is sound and consistent with NPPF provisions, notably paragraph 96 (previously paragraph 92 in the previous NPPF version).

Other Relevant Local Plan Provisions

At the Greater Norwich Local Plan (GNLP) Examination (which covers Broadland, South Norfolk and Norwich City administrative areas), reference to Police was omitted from a similar policy to HC4 (in that case Policy 4 of the GNLP) for similar reasons advanced by North Norfolk. At the GNLP Examination, Norfolk Constabulary requested change to this policy (in the manner underlined in blue in left hand column below) to ensure Police was specifically named in Policy 4. This change was sought based on the same arguments advanced to this NNLP Examination for change to policy HC4 (to ensure the plan is effective and justified). Based on the justification advanced to the Inspector, at the GNLP Hearing, GNLP officers recognised the need to include police infrastructure in policy wording. In October 2023, the main modifications were published and included MM10 (underlined in red in the right hand column below).

GNLP REPRESENTATION / CHANGE REQUESTED	MAIN MODIFICATION PROPOSED
<p>Policy 4 should be revised to read as follows.</p> <p><i>The Greater Norwich local authorities and partners including utility companies will work together in relation to the timely delivery of improvements to infrastructure, including that set out in appendix 1 and to:</i></p> <ul style="list-style-type: none"> <li>- <i>The energy supply network including increased capacity at primary substations at Cringleford, Peachman Way, Sprowston and Earlham Grid Local and/or innovative smart solutions to off-set the need for reinforcement;</i></li> <li>- <i>Water supply and sewerage network improvements including the waste-water network at Whitlingham water recycling centre,</i></li> </ul>	<p>Main Modification (MM10) proposed now includes police infrastructure and read.</p> <p><b>The Greater Norwich local authorities and partners including utility companies will work together in relation to the timely delivery of improvements to infrastructure, including that set out in appendix 1 and to:</b></p> <ul style="list-style-type: none"> <li>• <b>The energy supply network including increased capacity at primary substations at Cringleford, Peachman Way, Sprowston and Earlham Grid Local and/or innovative smart solutions to off-set the need for reinforcement;</b></li> <li>• <b>Water supply and sewerage network improvements including the waste-water network at Whitlingham water</b></li> </ul>

<p><i>the Yare Valley sewer and elsewhere to protect water quality and designated habitats;</i></p> <p><u>- Police Infrastructure</u></p> <p>- Health care infrastructure.</p>	<p>recycling centre, the Yare Valley sewer and elsewhere to protect water quality and designated habitats;</p> <ul style="list-style-type: none"> <li>• Health care infrastructure</li> <li>• <u>Police Infrastructure</u></li> </ul>
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Main Modification Required

For the reasons summarised above (and as detailed in the Norfolk Constabulary Regulation 19 representation), the Regulation 19 version of the Local Plan policy HC 4 (Infrastructure Provision, Developer Contributions & Viability) should be revised to ensure soundness, effectiveness and consistency with the NPPF by making specific reference to contributions towards police infrastructure with the following amendment (underlined in red, below).

....

**4. In particular development will be expected to provide, or contribute towards the provision of:**

- a. infrastructure requirements as identified in the site specific proposals;**
- b. the highest viable level of affordable housing;**
- c. the delivery of community infrastructure, including but not limited to education, healthcare, police, libraries, community facilities, telecommunications;**
- d. satisfactory .....**

In addition, Table 4 should include specific reference to Police and the supporting text should equally reference the need for police infrastructure to ensure that this is clear to developers.