

Greater Norwich Development Partnership Joint Core Strategy Examination

Matter 7 Main Towns, except Wymondham

Written Statement on behalf of
Welbeck Strategic Land Ltd

APPENDICES

- Appendix 1 - Anglian Water Correspondence dated 8th October**
- Appendix 2 - Create Consulting Sewage Capacity Note dated 12th October**
- Appendix 3 - Flagship Letter dated 5th October**
- Appendix 4 - Aylsham High School letter dated 6th October**
- Appendix 5 - Bidwells letter dated 8th October**

Introduction

- 1.1 We act on behalf of Welbeck Strategic Land Ltd (Welbeck) who has an interest in a 36 hectare site, on the eastern side of Aylsham to the north of Sir William's Lane. Welbeck submitted representations at submission draft Joint Core Strategy (JCS) stage in December 2009 supporting development in Aylsham. The previous representations should be read in conjunction with this Examination Statement on Matter 7.
- 1.2 We believe that the high level of infrastructure, facilities and amenities mean Aylsham is capable of supporting substantially more than the current draft allocation of 300. We understand that the draft allocation was principally informed by the limitation on foul sewage capacity, as had been identified by Anglian Water Services (AWS) at that time. AWS has confirmed this limitation is no longer a barrier to a higher housing allocation. We also believe that the allocation of housing numbers was somewhat arbitrarily arrived at when considered in the context of the overall GNDP distribution and that a more balanced approach reflecting Aylsham's overall infrastructure, environmental and social capacity would have seen higher numbers being allocated there.
- 1.3 Subsequent to the draft allocation, AWS have confirmed that foul sewage is no longer a constraint to the draft allocation of 300 units, nor indeed to a number significantly above this. Therefore we believe that the full potential of the infrastructure facilities in Aylsham can now be utilised and support the delivery of higher housing numbers.
- 1.4 By limiting the scale of growth at Aylsham, the JCS does not allow for sufficient flexibility in terms of the housing that could be accommodated and fails to reflect the advice of PPS1 which requires development to make the best and most efficient use of land.
- 1.5 This statement demonstrates that as a broad location Aylsham is capable of accommodating significantly more than 300 units and that sewage capacity issues will not restrict this level of development. It also demonstrates that land to the east of Aylsham is the most suitable area of the town to accommodate this growth. The following sets out our updated position with respect to the questions set by the Inspectors.

A Does the JCS provide sound core strategic guidance for the future planning of these towns, in particular the proposed Area Action Plan at Diss? Would the proposed levels of growth meet the demographic needs of the individual towns and maintain their comparative competitive positions in relation to nearby towns?

- 1.6 In appraising whether the proposed level of growth in Aylsham meets the demographic needs, it is essential to understand the infrastructure, environmental and social capacities of the town.

Infrastructure Capacity

Foul Sewage Capacity

- 1.7 The proposed wording for JCS Policy 13 states that the housing allocation for Aylsham will be 300 units, **subject to overcoming existing sewage disposal constraints**. The issue before the Examination is therefore whether this constraint still exists, and if so, whether it constitutes a 'show stopper'.
- 1.8 AWS are currently undertaking flow measurements at the Aylsham sewage treatment works (STW) and have confirmed by letter dated 8th October (**Appendix 1**) that there is some existing identified spare capacity and they may be able to delay the need for a new consent permit.
- 1.9 Over the past six months Create Consulting Engineers has been working closely with AWS to better understand the capacity issues. Following a number of meetings it has been established that there is sufficient capacity to serve an additional 556 new dwellings based on 2008 measured flow data. AWS has also confirmed that further capacity over and above 556 units may become available from diverting Aylsham flows to an existing STW which AWS are currently in the process of adopting. There is no evidence identifying any major constraints in respect to sewage treatment and foul drainage that would prevent a residential development of up to 556 dwellings coming forward to the east of Aylsham. A supporting note from Create Consulting is contained at **Appendix 2**. In summary:
- 1 There is existing capacity for 556 new dwellings in Aylsham;
 - 2 There is no concern with the proposed housing allocation;
 - 3 AWS are currently checking flow measurements to confirm the identified capacity; and,
 - 4 AWS has indentified three options for capacity increase in Aylsham.
- 1.10 In terms of connection to the STW, the existing STW is located to the east of the town and our clients land interest lies adjacent to Aylsham High School. The site is therefore ideally positioned to utilise an existing pipeline running across the site leading directly to it and it has been confirmed by tests that this sewer pipe has sufficient capacity to accommodate flows from growth in excess of 300 dwellings.

Utility Provision

- 1.11 Anglian Water has confirmed that water can be made available to serve the proposed level of development proposed in the JCS. The development land proposed to the east of the town is ideally located immediately adjacent to the existing abstraction point and therefore minimal connecting infrastructure is required to provide a suitable supply.
- 1.12 EDF has confirmed that they have sufficient power to serve the proposed growth allocation. The development of the east of the town is ideally located to the south of the existing primary sub-station. Minimal infrastructure is therefore required to provide a suitable connection.

Transport

- 1.13 Aylsham sits within the RPA part of the GNDP and does not have the same commuter town functions as say Wymondham. Aylsham does however benefit from excellent transport links and acts as a self-contained market town with a substantial proportion of its residents staying in the vicinity of the town for their employment opportunities. The town is well serviced by public transport with a regular bus service connecting the town with other settlements to the north and Norwich city centre to the south. Para 6.35 of the JCS acknowledges that bus services on the Cromer/Sheringham to Norwich route are relatively frequent. Journey times and reliability will benefit from proposed enhanced infrastructure on the A140 corridor from Norwich International Airport to the City Centre.
- 1.14 The A140 is generally of a good standard and providing an effective highway link to Norwich to the south and Cromer to the north. The link into Norwich has the benefit of passing both the Airport and the Park and Ride without having to pass through the city. The section of the A140 to the east of the town provides an effective bypass for through movements, freeing the town centre from unrelated traffic.
- 1.15 Access to the proposed development areas to the east of Aylsham can be readily achieved from the A140 without placing additional stress on the existing town centre or its interconnecting routes. The area is well located adjacent to the secondary school and within easy walking distance of the town centre. The level of growth identified in the JCS can readily be accommodated within the existing highway network and the area to the east of Aylsham would provide a sustainable location for development in excess of the current allocation.

Social Capacity

Affordable Housing Need

- 1.16 Flagship Housing Group is a leading developer of affordable housing within the eastern region. Flagship has been working in partnership with Welbeck over the past 12 months including proposals for residential development to the east of Aylsham. Over this period Flagship has maintained the view that there is a severe shortfall of affordable housing units within the town.
- 1.17 Flagship has indentified a requirement for at least 102 new affordable dwellings for people currently residing in Aylsham. This need is exacerbated by the limited delivery of affordable housing in Aylsham, with only 8 affordable homes built since 2005. Whilst we believe there are a further 36 units in the development pipeline to 2015, we cannot be certain they will be delivered and the demand may therefore increase. Furthermore, this figure only accounts for households living in Aylsham at present and excludes those living outside of the town looking for a home there. Broadland DC is currently unable to break down their full list of applicants into preferred areas of living, although Flagship estimate this additional requirement to be in the region of 50 units. This creates a projected requirement of 152 units in Aylsham.
- 1.18 Focused Change 1 Policy 4 states that 40% of all new development over 16 dwellings will be made up of affordable housing (85% social rented and 15% intermediate). On the basis of an existing 152 affordable unit requirement, Aylsham would need to accommodate a minimum of 380 dwellings (at a 40% provision rate) to deliver this. This figure does not take into account any further demand witnessed over the plan period. If affordable housing demand is to be addressed it is essential that the town accommodates sufficient land for new housing development.
- 1.19 Flagship has provided a letter outlining their position which is contained in **Appendix 3**.

Housing Market

- 1.20 Although the housing market has witnessed a downturn over the past two years, recent evidence from Bidwells confirms that the potential for sales in Aylsham remains strong. Aylsham is recognised as being one of the most desirable locations within the GNDP area and Bidwells projections indicate the market demand is for substantially more than 300 units over the next plan period. The correspondence from Bidwells contained in **Appendix 4** states that they would expect to see 50-60 private dwelling sales per year over the plan period. On

the basis of a 15 year plan the market requirement for housing in Aylsham is therefore in the region of 750 – 900 units.

- 1.21 In summary, it is clear that there is both an affordable and market need for at least 300 units within Aylsham.

Education Capacity

- 1.22 The supporting text to JCS Policy 13 states that schools in Aylsham are not at capacity. Welbeck has been working closely with Aylsham High School over the past 12 months on proposals that will ensure the long term future of the school.
- 1.23 Aylsham High School currently accommodates 1020 students in years 7-11. Aylsham High is a popular school with an excellent reputation within the wider community and this year achieved the second highest results in Norfolk in GCSE examinations. The school is currently exploring Trust status as part of their plans to formalise the work of the Aylsham Cluster of schools. The Aylsham Cluster is held nationally and locally to be an exemplar of cross-phase collaborative working. If the Cluster is successful in acquiring a Trust it is hoped that it will be completed by February 2011.
- 1.24 There have been previous expansion plans for the school, and the Broadland Local Plan 2006 contains a policy (AYL9) which identifies an area of land adjacent to the school to be allocated for outdoor playing purposes with a new access from Sir Williams Lane. However, these expansion plans have yet to be realised. These plans were advanced because the school had already expanded and the local authority had identified a significant shortfall in play space.
- 1.25 With the prospect of new residential development in Aylsham adjacent to the site, the school consider there is a now real opportunity of working to deliver ambitions for expansion and the school is now actively working to deliver a number of elements outlined in the letter contained in **Appendix 5**.
- 1.26 It is the schools aspiration that the proposals for expansion will enable them to become one of the focal points for the community of Aylsham and the wider region. Proposals are currently being worked up in detail as part of the identified housing allocation for 300 units in Aylsham which, if successful, will see a substantial area of land transferred to the school.

Retail Provision

- 1.27 Aylsham has the fourth highest level of shops and services outside Norwich. Para 2.2.51 of the JCS Sustainability Appraisal 2009 states that Aylsham provides essential local convenience shops, and when compared to other locations, has a wider range of provision.
- 1.28 Para 6.34 of the JCS states that Aylsham has the potential for new shopping floor space up to 2016, which will require the suitable expansion of the town centre. Furthermore, a new supermarket has recently opened on Norwich Road and the JSC acknowledges this facility can accommodate forecast need for convenience shopping.
- 1.29 In terms of existing and planned retail provision, it is clear Aylsham can accommodate at least 300 new dwellings.

Employment Provision

- 1.30 Para 6.34 the JSC states that jobs growth will be encouraged in line with the needs of Aylsham and its catchment and will include allocations to ensure the availability of employment land.
- 1.31 Aylsham is identified as a selected location for employment development in accordance with policy GS2 of the Local Plan 2004. The town has a good balance of employment to population for a market town with low unemployment (2.3% in 2008). The previous Norfolk Structure Plan recognised Aylsham a market town providing a focus for jobs, services and housing for the surrounding area.
- 1.32 Sustainability Appraisal (SA) Objective EC1 was designed to encourage sustained business and create a sustainable, diverse, thriving economy accessible and appropriate to the needs of all the community and where the social and environmental performance of economic growth. The SA states that sustained investment at strategic and other employment locations will help create a stronger economy. Furthermore, the SA envisages that the four main towns of Aylsham, Diss, Harleston and Wymondham will enjoy greater economic prosperity with new opportunities for business.
- 1.33 Existing employment opportunities that have been provided over the last plan period, plus encouragement of sustained business indicate that again Aylsham can support the proposed JSC housing allocation and more.

Environmental Capacity

- 1.34 The SHLAA 2009 identifies 11 residential sites in Aylsham that are considered deliverable over the plan period. These sites total 3000+ dwellings and it is therefore clear that in terms of deliverable housing land Aylsham can accommodate a significantly higher allocation than currently outlined in the JCS.
- 1.35 The SHLAA Stage 8 (Sept 2009) looks at the combination effects and constraints for development across the district. At para 4.4 the document acknowledges that in the RPA constraints are more location specific, but nevertheless have a limited effect on the amount of development that can be achieved. Aylsham is cited as having waste treatment issues, however an upper limit of 1000 new dwellings over the plan period is suggested. This figure is again significantly higher than the current JCS allocation.
- 1.36 It is also worth referring to the Broadland DC Site Allocations Options DPD which was released for consultation in June 2010. Although the consultation period was put on hold (due to the abolition of Regional Spatial Strategies) soon after its release, land to the east of Aylsham featured as the overwhelmingly preferred location for development
- 1.37 SA policy ENV 5 states that the four main towns of Aylsham, Diss, Harleston and Wymondham must retain attractive historical centres. It is clear from the SHLAA Map that new residential development will not be located in the historic centre of Aylsham, but instead on the periphery of the town. It is therefore essential that any new development does not adversely impact on views towards the town centre, specifically the church spire. Landscape work associated with the eastern side of Aylsham considers this location to have a minimal impact on existing landscape and again the eastern side of the town is considered the best location for development.

Ecology

- 1.38 There are no non-statutory designated sites either within or immediately adjacent to the east of Aylsham.
- 1.39 Although a County Wildlife Site (CWS) is located approximately 0.6km to the north-east of Aylsham, and the Burgh Hall Woods & Plantation CWS and Lodge Farm Meadows CWS are approximately 0.8km to the east and north, they are sufficiently removed and buffered by existing development as to be unaffected by new residential development.

1.40 Ecological survey work has been carried out on land to the north of Sir Williams Lane based around an extended Phase 1 survey methodology, as recommended by Natural England and this accompanied our previous representations. Further fully comprehensive surveys were undertaken throughout Spring and Summer this year which have confirmed that the location is free from any protected species. Consequently, there are no ecological issues of any significance constraining development activity.

B If the JCS is unsound in relation to any of these matters, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1.41 In general Welbeck support the focus of development being in Norwich and the Main Towns. Our concerns arise due to the quantum of housing identified for the various other settlements and the justification and delivery of the allocation in Aylsham. As such we consider for the reasons herein, Policy 13 is currently **unsound** and uninformed by a sound evidence base.

1.42 The JCS needs to provide guidance on how the allocations shall be tested. At present there is nothing to reflect the balance of proposed housing allocations within the main towns. The JSC must explain how the comparative merits of the towns in terms of the environmental, social and infrastructure capacities have been addressed.

Proposed Level of Housing Provision at Aylsham

1.43 In answering the Inspectors' questions this statement demonstrates that Aylsham is capable of supporting at least 300 dwellings. Importantly, it has demonstrated that the sewage capacity issues referred in Policy 13 will not restrict development and consequently we consider that the draft policy can be safely amended to reflect this updated technical position.

1.44 Aylsham is identified in the draft plan for an allocation of 300 dwellings and our previous representations sought a higher allocation. The additional information that has become available since the submission draft consultation enable us to confirm this position as being valid in the knowledge that higher numbers are both appropriate and technically deliverable.

1.45 This statement also demonstrates that the most appropriate and sustainable location for residential development in Aylsham is to the east of the town. We therefore consider that the proposed JCS policy should give guidance in this respect and identify residential development in this general location rather than across the town as a whole.

Appendix 1
Anglian Water Correspondence dated 8th October



**Anglian Water
Services Limited**
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Bronwyn Buntine
Principal Engineer
Create Consulting Engineers Ltd
Hungate House
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Norfolk
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Tel 01733 414502
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08 October 2010

Dear Ms Buntine

New growth and developments in Aylsham

Further to our recent meeting and telephone calls, I am pleased to be able to provide an update on the wastewater capacity at the sewage works in Aylsham.

We have been looking at a number of options in order to meet the growth being planned by the local planning authority. To these means, we are working closely with the Environment Agency and other parties and we are exploring the following three options:

1) Theoretical flow through the sewage works

We are currently looking at the difference between our measured flow rate and the theoretical. Our information shows that the newly measured flow rate is lower than the theoretical flow. There may be additional capacity at the works above that currently being received and therefore we may be able to delay the need for a new consent permit.

2) Infiltration in the catchment

As a matter of routine, we are looking at the amount of infiltration within the catchment. By locating and reducing infiltration we would be able to reduce the flow entering the works. This will delay the need for requesting a new consent from the Environment Agency.

3) Private Sewage Works

We are currently pursuing the option of adopting a private sewage works. If successful, we would look to diverting some of the existing

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an AWG Company

network into this new sewage works. This would create capacity in the existing Aylsham sewage works and delay the need for a new consent permit.

I hope that this information is useful. If you have any questions then please contact me on 07739 936413 or via email at gbarker@anglianwater.co.uk.

Yours sincerely,

Gareth Barker (Dr.)
Senior Developer Account Manager

Appendix 2
Create Consulting Sewage Capacity Note dated 12th October

Create Consulting have been instructed by Welbeck Strategic Land Ltd to prepare a note which outlines in more detail the discussions that have been held to date with Anglian Water Services (AWS) and the Environment Agency (EA) regarding the capacity of the existing Sewage Treatment Works (STW) located to the east of Aylsham.

The Water Cycle Study – Final Report, February 2010, outlined that the Aylsham STW had additional flow capacity for an additional 806 dwellings at the works. The extract from the study enclosed in Appendix A identified that there was a future headroom capacity of 206 dwellings after allowing for potential growth of 600 houses in Aylsham. It was assumed that, out of this 600 dwellings, 250 of the houses were committed, leaving 350 dwellings to form part of additional future growth allocation for Aylsham. The existing STW therefore had sufficient capacity to serve 556 dwellings over and above committed development. These calculations were based on measured flow data from 2008.

Since the production of the Water Cycle Strategy, a number of concerns have been raised with respect to the capacity of the Aylsham STW works and its ability to take additional development whilst still operating within its existing consent.

Create Consulting, therefore, opened a dialogue with AWS and the EA to try and address these concerns. The preferred strategy was to work with AWS with respect to the existing Aylsham STW, however, an alternative of potentially constructing a new STW discharging into the River Bure to serve the additional housing has been considered. The EA in their letter dated 14 July 2010 (see Appendix B) confirmed that in the first instance they would want to see the existing capacity of the Aylsham STW fully utilised before agreeing to any new consents. If, however, it could be shown that there was no spare capacity, then they would consider a new consent and outlined the required standard which was achievable using current technology.

Following receipt of this letter, Create then re-approached AWS with respect to confirming the position with respect to the existing works. Flow measurements and calculations undertaken in 2008 clearly showed there was additional capacity and therefore it was unclear why an issue had been raised.

A meeting was held with AWS on 13 September 2010 between Create and AWS to discuss both discharge consent issues and flow capacity. Create reinforced that our preferred option was to work with AWS to improve the existing sewage infrastructure which would give a wider benefit to the overall town. AWS agreed to discuss the issues with respect to discharge consents with the EA and to review the capacity issues internally.

The letter from AWS dated 8 October 2010, enclosed in Appendix C, confirms the various options which are being considered by AWS. AWS believe that the actual measured flows going through the works will be less than the theoretical flows, which will enable the works to take additional dwellings working within the limits of the existing consent. This would reinforce the measurements and

calculations undertaken in 2008 which formed the basis of the Water Cycle Study conclusions which confirmed that there was additional spare capacity to serve 556 dwellings over and above committed development.

There have been no changes in the Aylsham area since 2008 which would have significantly changed the dry weather flows to the existing works. Therefore, it is anticipated that the results of points 1 and 2 of the AWS letter will confirm the earlier assumptions and that the works will be able to serve the additional 556 new dwellings.

In addition to the spare capacity which may be available at the works, AWS have confirmed that they are also looking at a strategy to direct some of the existing flows from the Aylsham site to an existing STW which they are about to adopt elsewhere in the catchment. This will relieve the works at Aylsham of some of its demand providing further additional capacity for growth.

AWS are currently undertaking the flow measurements at the Aylsham STW at present and it is anticipated that these results will be available within the next few weeks.

SUMMARY

The Water Cycle Study demonstrated that Aylsham STW had sufficient capacity to serve an additional 556 new dwellings based on 2008 measured flow data. AWS are now undertaking flow measurements on site to confirm if there have been any significant changes. Further capacity can also be made available from diverting from the Aylsham Works to an existing STW which AWS are currently adopting. There is no evidence identifying any major constraints in respect to sewage treatment and foul drainage that would prevent a residential development of up to 556 dwellings coming forward to the east of Aylsham.

Jonathan Cage, BEng (Hons), MSc, CEng, MICE, MCIHT
Create Consulting Engineers Ltd
12 October 2010

APPENDIX A

Calculations



Job Title	Norwich Water Cycle Study - Detailed Study				Date	Project Number
Element	Aylsham WWTW Volumetric Capacity Assessment				17/11/2009	D118607
Originator	Checked	Revision	Suffix	Orig		
SK			Date	Check		

Site Name: Aylsham WWTW
Site Location: TG 2083 2675
Receiving Watercourse: River Bure

Base Data - Provided by AWS from June 2008 Return		
Total PE		8,507 PE
Domestic and Tanker Load PE	Pd	8,281 PE
Holiday PE	Ph	210 PE
Trade Flow	E	6 m3/d
Dry Weather Flow Consent	DWF	1,440 m3/d
Flow to Full Treatment Consent	FtFT	m3/d
Measured Dry Weather Flow	mDWF	1,150 m3/d

Parameters	
Consumption	
Gd Domestic	0.144 m3/d
Gh Holiday	0.055 m3/d
Gc Commercial	0.028 m3/d
Gi Industry	0.028 m3/d
Gf Future Domestic	0.137 m3/d
Dwelling Occupancy	
OR Occupancy Rate	2.1 people

Current Calculated Flow (for Reference Only)		
Population Consumption	$PG = (Pd * Gd) + (Ph + Gh)$	1,204 m3/d
Infiltration	$I = 0.25 * PG$	301 m3/d
Trade Flow	E	6 m3/d
Calculated DWF	$PG + I + E$	1,511 m3/d
Calculated FtFT	$3PG + I + 3E$	3,930 m3/d

Current Headroom Calculations		
DWF Capacity	$DWF - mDWF$	290 m3/d
FtFT Capacity	$FTFT - \text{Calculated FtFT}$	m3/d
Population Capacity		1,693 PE
Dwelling Capacity	$\text{Population Capacity} / OR$	806 dwellings

Future Housing Allocations		
Number of Dwellings	Hf	600 dwellings
Additional Population	$Phf = Hf * OR$	1,260 PE
Additional Flow from Housing	$PGhf = Phf * Gf$	173 m3/d
Additional Infiltration from Housing	$Ihf = 0.25 * PGhf$	43 m3/d

Future Employment		
Number of Commercial Jobs	Ecf	Jobs
Number of Industrial Jobs	Eif	0 Jobs
Additional Flow from Employment	$Eef = (Ecf * Gc) + (Eif * Gi)$	0 m3/d

Future Calculated Flow		
Additional DWF from Future Dev	$aDWF = PGhf + Ihf + Eef$	216 m3/d
Future Calculated DWF	$fDWF = mDWF + aDWF$	1,366 m3/d
Future Calculated FtFT	$fFTT = cFtFT + 3PGhf + 3Ihf + 3Eef$	4,491 m3/d

Future Headroom Calculations		
DWF Capacity	$DWF - fDWF$	74 m3/d
FtFT Capacity	$FTFT - fFTT$	m3/d
Population Capacity		432 PE
Dwelling Capacity	$\text{Population Capacity} / OR$	206 dwellings

APPENDIX B

Bronwyn Buntine
Create Consulting Engineers
bronwyn.buntine@createconsultingengineers.co.uk

Our ref CCE/2010/43348
Date 14 July 2010

Dear Ms Buntine

Sir William's Lane, Aylsham

Thank you for your enquiry addressed to my colleague Rachel Rees received on 17 June, and subsequent payment of £41.75. Following internal consultations we are able to reply to your enquiry as follows.

1) I can advise that the existing discharge permit limit details for Aylsham STW are as follows:

Suspended Solids 60mg/l (95%ile)
Biological Oxygen Demand (BOD) 40mg/l (95%ile), maximum: 80mg/l
Phosphorus: 1mg/l (mean)
Ammonia: 5mg/l (95%ile), Maximum: 20mg/l
Iron: 3000mg/l (maximum)

a) We are currently working with the water company to confirm the situation at Aylsham sewage treatment works (STW). This will confirm whether there is available headroom at the works. Until this work is complete it is difficult to establish with certainty what the future flows might be to accommodate a further 500 dwellings in the STW catchment and hence what the indicative quality permit limits would be.

Notwithstanding this, the river Bure at Aylsham is currently classified as 'high' under the Water Framework Directive for BOD, dissolved oxygen, ammonia and phosphorus; and as the STW currently has a phosphorus permit limit that is at the Current Economic Limit, it can be inferred that any future quality permit limit for phosphorus will be difficult to achieve with conventional technology.

Further, Aylsham is upstream of the Bure Broads and Marshes Site of Special Scientific Interest (SSSI), a component SSSI of the Broads SAC and Broadland SPA. Our Review of Consents for this site concluded that this site should be considered to be 'at capacity' in terms of phosphorus loads in the catchment. Any proposals therefore to increase the phosphorus load from existing or new discharges would require a catchment-wide review of permits to ensure there was no overall increase in load of phosphorus to the Bure Broads and Marshes system.

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General Enquiries: 08708 506506 Fax: 01473 724205

Weekday Daytime calls cost 8p plus up to 6p per minute from BT Weekend Unlimited.

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Website: www.environment-agency.gov.uk

We are currently working with the water company to confirm the situation at Aylsham STW and the implications this has for growth in the catchment. Information will be made available as soon as possible with the agreement of the water company.

b) A new discharge at TG20552 27550 to accommodate 500houses with a dry weather flow (DWF) of 165m³ per day has been considered. Calculation of the DWF is based on the following assumptions which are commonly used to estimate domestic flow rates:

- 2.1 persons per dwelling occupancy rate
- 150litres per head per day per capita consumption
- Domestic flow rate of 95%
- 10% infiltration
- 10% 'headroom' to allow for seasonal variability in flows
- No flows from commercial/ industrial development.

The following indicative permit limits have been calculated for discharge of 165m³/day at TG 20552 27550 to ensure no deterioration greater than 10% of upstream water quality ('high' WFD classification):

Phosphorus: 1.5mg/l (mean)

Ammonia: 1mg/l

Suspended Solids: 60mg/l (95%ile)

BOD: 40mg/l (95%ile)

Iron: tbc (would be required if iron dosing to remove phosphorus were pursued)

Please note the above comments and suggested limits are indicative only. Any applicant should apply to our National Permitting Service (NPS) in good time for a permit. The NPS may not support the above limits.

2) It is unclear whether your query refers to a new works on the site of the Aylsham STW or a new discharge at TG 20552 27550.

In terms of a new discharge in Aylsham, to give this full consideration it is important that we first confirm with the water company the situation with regards capacity in the sewerage infrastructure (network and STW). Aylsham is sewered and there would be a presumption against further discharges if there were capacity in the existing system.

As described above, any new or increased discharge permit in the catchment of the Bure Broads and Marshes SSSI catchment would need to be carefully considered to ensure no increase in load to the site. It may be that a catchment-wide approach to permitting would need to be taken to accommodate a new discharge permit or to increase an existing discharge permit.

3) The proposed site is directly over Wroxham Crag Formation and as such we disagree with the conclusion "*the site is not located within any water bearing superficial deposits*". The aquifer is designated as a Principal aquifer and as such there will be constraints on development, such as the discharge to ground.

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Therefore, we cannot assume that the proposals will be feasible. Can I ask that you contact my colleague David Seccombe (01473 706098) to discuss the proposals in more detail.

Please see the attached notice for details of the permitted use of the information provided.

If you have any special needs (i.e. dyslexia, visual or other physical impairment), we will be able to supply the data in an alternative format.

I trust this answers your queries and if I can be of further help please do contact me.

Yours sincerely



Karen Hills
External Relations Officer
Direct Dial: 01473 706720

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APPENDIX C



**Anglian Water
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08 October 2010

Dear Ms Buntine

New growth and developments in Aylsham

Further to our recent meeting and telephone calls, I am pleased to be able to provide an update on the wastewater capacity at the sewage works in Aylsham.

We have been looking at a number of options in order to meet the growth being planned by the local planning authority. To these means, we are working closely with the Environment Agency and other parties and we are exploring the following three options:

1) Theoretical flow through the sewage works

We are currently looking at the difference between our measured flow rate and the theoretical. Our information shows that the newly measured flow rate is lower than the theoretical flow. There may be additional capacity at the works above that currently being received and therefore we may be able to delay the need for a new consent permit.

Registered Office
Anglian House,
Ambury Road, Huntingdon,
Cambridgeshire. PE29 3NZ
Registered in England
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an AWG Company

2) Infiltration in the catchment

As a matter of routine, we are looking at the amount of infiltration within the catchment. By locating and reducing infiltration we would be able to reduce the flow entering the works. This will delay the need for requesting a new consent from the Environment Agency.

3) Private Sewage Works

We are currently pursuing the option of adopting a private sewage works. If successful, we would look to diverting some of the existing network into this new sewage works. This would create capacity in the existing Aylsham sewage works and delay the need for a new consent permit.

I hope that this information is useful. If you have any questions then please contact me on 07739 936413 or via email at gbarker@anglianwater.co.uk.

Yours sincerely,

Gareth Barker (Dr.)
Senior Developer Account Manager

Appendix 3
Flagship Letter dated 5th October

DDI: 01603 255434
Email: Doug.Malins@flagship-housing.co.uk

Broadland District Council
Thorpe Lodge
1 Yarmouth Road
Norwich
NR7 0DU

Flagship
Keswick Hall, Keswick
Norwich, Norfolk NR4 6TJ
T: 01603 255400
F: 01603 255404
E: info@flagship-housing.co.uk
W: flagship-housing.co.uk

5th October 2010

Dear Sir/Madam,

LAND OFF SIR WILLIAMS LANE, AYLSHAM

I write with reference to the above site and the emerging Greater Norwich Housing Partnership proposals for residential development in Aylsham.

Flagship is a leading developer of affordable housing within the eastern region, owning and managing over 20,000 affordable homes across Norfolk and Suffolk. Flagship provides central development services for three core Registered Providers; Peddars Way Housing Association, Suffolk Heritage Housing Association and King's Forest Housing Association. Additionally Flagship provides development services for a number of 3rd party Registered Providers, including Chelmer Housing Partnership and Victory Housing Trust. Flagship is currently working in partnership with Welbeck Strategic Land on a number of large housing sites in East Anglia and has agreed to work together with them in a similar fashion at the site off Sir Williams Lane in Aylsham.

Flagship has identified a current requirement for a minimum 102 affordable homes for households currently residing in Aylsham. At the present time it is only possible to identify housing need for a locality by current residence and therefore it is not possible to gauge how many households currently residing outside of Aylsham wish to live in an affordable home within the town. Flagship would estimate this additional housing need to be for a minimum 50 affordable homes however, providing a minimum requirement for 152 affordable homes within the town.

The housing need identified is exacerbated by the limited delivery of affordable housing in Aylsham in recent years, with only 8 affordable homes built since 2005 and a current pipeline of only 36 further general need affordable homes projected until 2015.

Occupiers of Flagship housing schemes across the region can be generally categorised as being well situated in terms of relative location to town and village services. It is our belief that the requirements in Aylsham will be the same and that a mixture of family homes and small proportion of flats well situated to existing services will be required.

Flagship considers the site off Sir Williams Lane to be a highly attractive one for the provision of affordable housing. In particular this is because of its close walking distance to the town centre and proximity to the local school.

Flagship will work with Welbeck Strategic Land over the final layout and designs of the affordable homes to ensure that they are designed to the relevant standards. Flagship confirms that it will be happy to purchase all the affordable units in the development and thus anticipates making a joint names planning application at the earliest opportunity.

Yours sincerely

A handwritten signature in black ink, appearing to read 'DM', with a long horizontal stroke extending to the right.

Doug Malins
Head of Business Development

Appendix 4
Aylsham High School letter dated 6th October

Mr Simon Osborne
The Programme Officer
Joint Core Strategy
1 Lower Farm Cottages
Puttock End
Belchamp Walter
Sudbury
Suffolk
CO10 7BA

6th October 2010

Dear Mr Osborne

AYLSHAM HIGH SCHOOL PROPOSED EXPANSION

SIR WILLIAMS LANE, AYLSHAM

We write with regard to the forthcoming Examination into the submitted Joint Core Strategy Development Plan Document.

Aylsham High School currently accommodates 1020 students in years 7-11. Aylsham High is a popular school with an excellent reputation within the wider community and this year we achieved the second highest results in Norfolk in GCSE examinations. We are also currently exploring Trust status as part of our plans to formalise the work of the Aylsham Cluster of schools. The Aylsham Cluster is held nationally and locally to be an exemplar of cross-phase collaborative working. If the Cluster is successful in acquiring a Trust it is hoped that it will be completed by February 2011.

There have been previous expansion plans for the school, and the Broadland Local Plan 2006 contains a policy (AYL9) which identifies an area of land adjacent to the school to be allocated for outdoor playing purposes with a new access from Sir Williams Lane. However, these expansion plans have yet to be realised. These plans were advanced because the school had already expanded and the local authority had identified a significant shortfall in play space.

With the prospect of new residential development in Aylsham adjacent to the site, we consider there is a now real opportunity of working to deliver our ambitions for expansion and the school is now actively working with a developer to deliver the following:

- As part of a wider "Community Sports Village" concept linked to existing facilities at the school and at the Aylsham Recreation Ground:
 - Community fitness facilities in a fitness suite linked to the existing community sports hall;
 - Delivery of a new full sized football pitch for school and community use;
 - A refurbished swimming pool to improve community access;
 - An astro-turf hockey pitch or full sized 3G football pitch (depending on local demand) for school and community use ;
 - Access to the River Bure for water sports and educational activities.
- New car parking facilities to alleviate current capacity issues; and

- Possible development of a new post 16 campus to provide greater capacity for the whole of the wider Broadland and North Norfolk area;

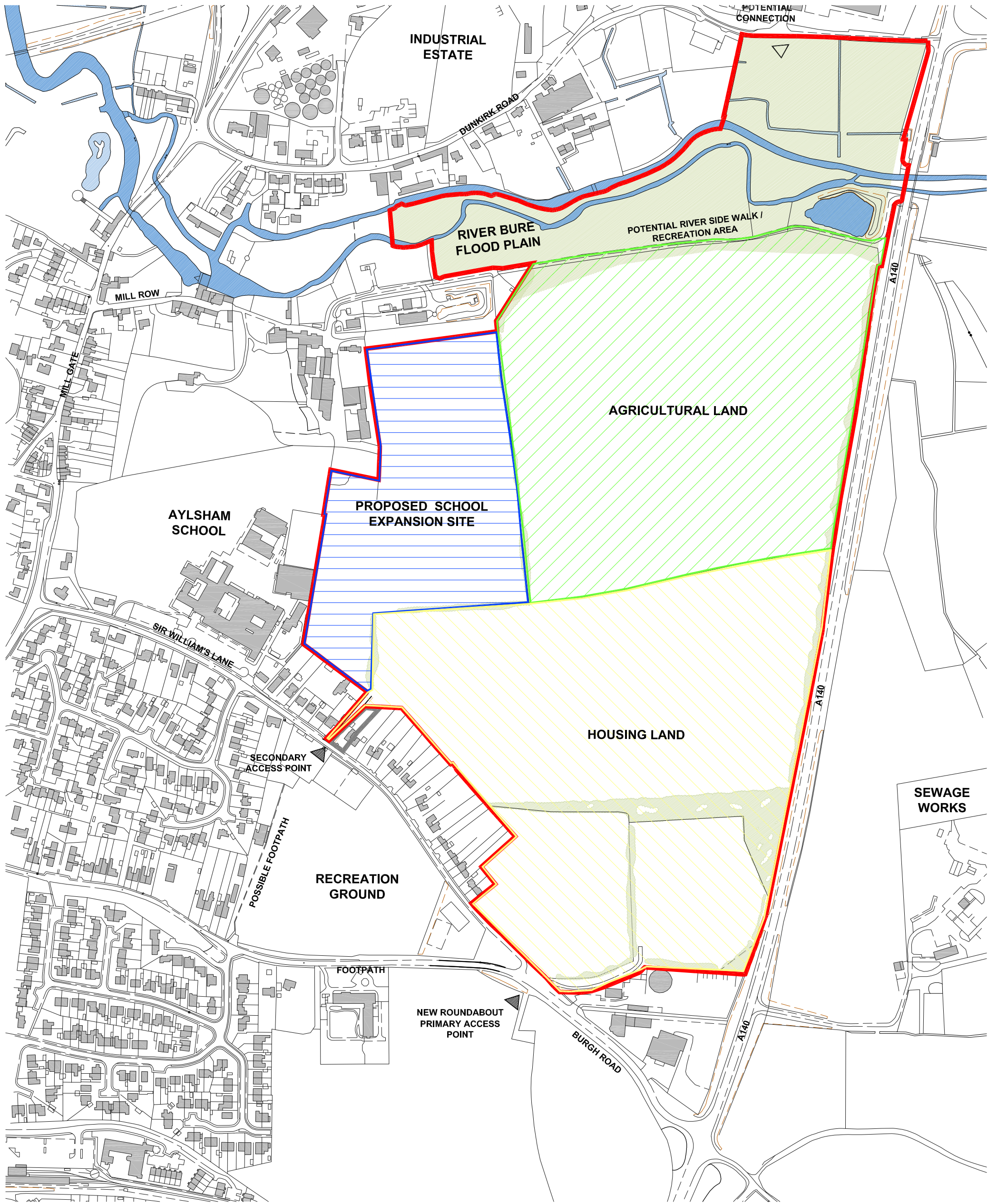
It is our aspiration that the proposals for expansion will enable the school to become one of the focal points for the community of Aylsham and the wider region.

Proposals are currently being worked up in detail as part of the identified housing allocation for 300 units in Aylsham which, if successful, will see a substantial area of land transferred to the school.

We trust this correspondence is of use in confirming that we support the identified expansion of Aylsham as a main town within the Joint Core Strategy.

Yours sincerely

Mr Duncan Spalding
Head Teacher Aylsham High School



AYLSHAM , NORFOLK



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DATE: 06.10.2010

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LAND AT SIR WILLIAM'S LANE, AYLSHAM.

PROPOSED AYLSHAM HIGH SCHOOL NEW
CAMPUS AND HOUSING DEVELOPMENT.

BROOKS / MURRAY

ARCHITECTS

8-10 NEW NORTH PLACE
LONDON EC2A 4JA

TEL 020 7739 9955
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architects@brooksmurray.com

Appendix 5
Bidwells letter dated 8th October

Your ref:
Our ref: DW/CJE 08.10.2010
dd: 01603 763939
df: 01603 763899
e: dwalker@bidwells.co.uk
Date: 8 October 2010

BIDWELLS

Erik Pagano
Welbeck Strategic Land Ltd
13 Woodstock Street
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W1C 2AG

16 Upper King Street
Norwich
Norfolk NR3 1HA
t: 01603 763939
f: 01603 763899
bidwells.co.uk

Dear Mr Pagano

Aylsham, Norfolk

Further to our recent conversations, I have pleasure in providing you with the information you have requested, namely the likely demand for New Build residential property in Aylsham, Norfolk. I offer the following comment;

Aylsham is a popular and traditional market town in North Norfolk, which is very well served with amenities. There is a variety of shops, schools and public transport and a vibrant local economy that offers good levels of local employment. Norwich itself is less than 13 miles away and provides much of the professional employment in the county and Aylsham is within striking distance.

Compared to other market towns and employment centres throughout the region, Aylsham compares favourably. Demand for the area is consistently strong and has held up well compared to many other locations such as Dereham and North Walsham to name but two. Existing developments such as the Hopkins Homes scheme in the town have continued to sell well and achieve sensible £ per sq ft rates through tougher economic times, further demonstrating the underlying demand in the town.

Sales rates in Aylsham will hold up well, and in normal economic times have been excellent. I would expect a sales rate for a new development to realistically achieve 5 sales per month, equating to 60 sales per annum. With the levels of pent up demand in Aylsham alongside the relative lack of residential development there to date I would expect 2 or 3 developers to be able to achieve this in the town simultaneously.

Overall the town is very suitable for extension and development. The market is a sustainable one, and particularly in the long term as we plan for more normal times should be an area of growth and prosperity.

I hope you find the above useful and if you have any further queries please let me know. I look forward to hearing from you in the near future.

Yours sincerely



David Walker
Bidwells New Homes