

### **Schedule of Changes to the GNLP for Cabinets January 2021**

1. Schedule 1 below sets out proposed further changes to the GNLP Strategy from version 1.6, which was considered by the GNDP on December 16<sup>th</sup> 2020 and forms part of the Broadland, Norwich and South Norfolk Cabinet papers for January 2021, to version 1.7.
2. Version 1.7, which is intended to be the Reg. 19 draft of the GNLP Strategy for Publication, will be tabled to the Cabinets ahead of their January meetings for consideration for Reg. 19 Publication in February and March 2021.
3. As well as this schedule of changes, version 1.7 of the GNLP Strategy itself, which includes the changes below, is available on the GNDP web site.
4. Schedule 2 sets out proposed changes to the Sites Document of the GNLP.

## Schedule 1 – Proposed changes to the GNLP Strategy

Issue	Policy/Para in v1.7	Reason for change	Revised text (in red) for v1.7
<b>Introduction</b>			
Amending retained plans	Paras. 24 and 25 (and appendix 4 – see below).	To clarify which retained plans the GNLP will be used in conjunction with and how parts of Area Action Plans will be amended by allocations in the GNLP.	<p>Para 24.</p> <p>The GNLP will not replace existing adopted Area Action Plans (AAPs) for Long Stratton, Wymondham and the Growth Triangle (NEGT), <b>though in some cases additional allocations are made through the GNLP in these areas. The GNLP will be used in conjunction with the adopted AAPs, Development Management policies for the three districts and Neighbourhood Plans.</b></p> <p>Para. 25.</p> <p>Further detail on superseded and retained plans, <b>including new allocations affecting the AAPs</b>, is in appendix 4.</p>
<b>Policy 1 The Strategy</b>			
Overall Housing Need	Paras. 177 and 179 and table 6 (and appendix 6 – see below)	The references to housing need and the standard methodology for calculating it have been updated to reflect the Government’s publication of the new methodology. Limited changes have been required, reflecting the fact that the new methodology is unchanged from the previous one for Greater Norwich. Publication of the standard methodology has allowed confirmation of the GNLP housing target in para. 180 and inclusion of the housing trajectory in appendix 6 (see below). It is important to note	<p>Para. 177.</p> <p>The Government produced a standard methodology for identifying local housing need in <b>December 2020</b><sup>1</sup> which requires forecasts to be based on the 2014 household projections unless there are exceptional local circumstances. Consequently, this plan follows the required approach and local housing need derived from the 2014-based household projections is set out in row A of Table 6 below. This local <b>housing</b> need is the target against which land supply will be measured (<b>see appendix 6</b>).</p>

<sup>1</sup> Detail available [here](#). The GNLP is being produced using the 2014 household forecasts as the basis for establishing housing need **as required by the guidance**. Recognising that the 2018-based projections indicate that growth may be higher, there is a significant delivery buffer, a contingency site and the plan makes use of only a proportion of its projected windfall delivery as a windfall allowance.

		<p>that, as stated in paras. 178 and 180 and in appendix 6, the annual target of 1,961 homes will be used for land supply calculations after the adoption of the GNLP.</p> <p>A footnote has been added to table 6 to clarify the source of the data used to establish the windfall allowance.</p>	<p>Para. 179.</p> <p>In line with the above figures, policy 1 provides for around 49,500 new homes. This is the total provision in the plan and is <b>not</b> the need or target against which land supply will be measured (see <a href="#">appendix 6</a>). The <b>residual</b> annual target for the 18 years of the remainder of the period, taking account of delivery between 2018 and 2020, is 40,541 (Row A) minus 5,240 (Row B), divided by 18 which equals <b>1,961 per annum</b>.</p> <p>Table 6 footnote 61</p> <p><a href="#">The projection of delivery from windfall sites is based on the method used in the 5 Year Housing Land Supply Statement for Greater Norwich for the period beginning 1 April 2019, published on 5 February 2020.</a></p>
Housing provision	Policy 1	Policy text amended from “sites are committed for” to “provision is made for” to reflect the inclusion of a windfall element to assist in meeting housing need.	<p>Amend first bullet to read:</p> <ul style="list-style-type: none"> <li>to meet the need for around 40,550 new homes, <b>provision is made</b> for a minimum of 49,492 new homes;</li> </ul>
<b>Policy 2 Sustainable Communities</b>			
Flood Risk	Policy 2, point 9	In response to advice from flood risk consultants.	<p>Point 9.</p> <p>Support efficient water management. Flood risk should be minimised, including avoiding <b>inappropriate development</b> in areas at significant risk of flooding, reducing the causes and impacts of flooding, supporting a catchment approach to water management and using sustainable drainage.</p>
<b>Policy 4 Infrastructure</b>			
Rail	Amend para. 236	To more accurately reflect the content of the adopted Growth Triangle Area Action Plan.	<p>Revise to:</p> <p>Two new railway stations are planned for the area. The Growth Triangle Area Action Plan identifies <b>the potential for</b></p>

			new station sites on the Norwich to Sheringham line at Rackheath and Dussindale to serve these major employment and housing growth areas.
Transport improvements and the HRA	Additional para. 245 in relation to policy 4 on infrastructure	To provide clarity on the requirement for transport schemes to prevent adverse effects on protected nature sites as required by the HRA.	<p>New para. 245.</p> <p>The GNLP authorities will support the transport infrastructure improvements provided that their promoters and the relevant competent authority are able to demonstrate that they would not conflict with other policies of the plan and where there would be no adverse effect on the integrity of sites protected under the Habitats Regulations Directive.</p>
Water Quality and the HRA	Additional para. 257 and changes to policy 4 on infrastructure	To provide clarity on the requirement for major development to prevent adverse effects on water quality affecting protected nature sites as required by the HRA.	<p>New para. 257.</p> <p>To ensure that development does not have a detrimental impact on the water environment, particularly in relation to water quality and the potential for impacts on the water-based sites protected under the Habitats Regulations Directive, major development will be dependent on the water infrastructure being capable of accommodating the development or being able to be made so.</p> <p>Revisions to policy 4:</p> <ul style="list-style-type: none"> <li>Water supply and sewerage network improvements including the waste-water network at Whitlingham water recycling centre, the Yare Valley sewer and elsewhere to protect water quality and designated habitats</li> </ul>
New High Schools	Para. 261 and appendix 1	To provide an update on the location of the proposed new high school in the Growth Triangle	<p>Amend para. 261 to remove former reference to a potential school in Beeston Park so that it reads:</p> <p>Appendix 1 provides details of new schools to serve growth. Sites in this plan and other local plan documents</p>

			<p>include locations for new schools. The requirement for a new high school in the North East growth area is specifically identified in policy 4 due to its strategic significance.</p> <p>Amend appendix 1 to:</p> <p><b>White House Farm Sprowston or North Rackheath – the potential locations for a new secondary school required to support housing growth in the Growth Triangle.</b></p>
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**Policy 6 The Economy**

Town Centre Uses	Revised para. 298	To provide clarity that, in the light of recent and potential future changes to national permitted development rights, the only means by which the councils can reduce the potential impact of the conversion of many town centre uses to residential uses is by establishing Article 4 Directions locally. This will be a decision for each council. The role of the GNLP is to establish the retail hierarchy as it does in policy 6, with the detailed definition of the retail centres themselves in existing Development Management policies.	<p>Revise to:</p> <p>298. Retail, offices and some leisure uses are currently the same use-class and this helps provide flexibility within town centres. <b>The policy's definition of the local retail hierarchy enables the individual councils to consider whether, dependent on national permitted development rights, Article 4 Directions may be appropriate locally. This approach would allow protection of all or parts of retail centres, potentially ranging from local to town centres and the city centre as defined in Development Management policies, from conversion to residential uses. In addition,</b> large scale out of centre office, retail or leisure development will have <b>significant</b> implications, for example for traffic generation, and it will be important to ensure through conditions that the development that takes place is consistent with the evidence provided with the planning application.</p>
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Tourism and the HRA	New para. 299 (relocated and replaces previous para. 222)	To provide clarity on the requirement for tourism development to prevent adverse effects on protected natural sites as required by the HRA.	Para. 299.  Tourism, and related developments, are an important part of the local economy and reflect the attractiveness of the environmental and cultural offer in the area. However, it is important that this attraction does not itself lead to damage of the very things that people come here for. In particular, consideration under the Habitat Regulations will be needed for such developments. The requirements set out under Policy 3 for new residential development will apply to tourist accommodation development; and a Habitat Regulations Assessment (HRA) will be required for significant tourism, leisure, cultural or environmental development which would impact on a Habitats Regulations protected site.
<b>Policy 7.1 – The Norwich Urban Area including the fringe parishes</b>			
Growth Triangle Housing	Para. 342	To correct the figure in the text for Growth Triangle housing allocations reflecting policy 7.1	342. In line with its adopted Area Action Plan, and with the addition of a site for over 1,200 new homes at White House Farm in Sprowston allocated through this plan, the Growth Triangle provides for approximately 13,500 new homes to 2038,
<b>Appendix 4 Retained and superseded plans</b>			
Amendments to Area Action Plans (AAPS) by the GNLP	Additional text and table in the appendix	To explain where the GNLP makes allocations which amend elements of the adopted AAPs.	See the additional text and table for appendix 4 below.
<b>Appendix 6 Housing Trajectory</b>			
Housing Trajectory	The Housing Trajectory appendix has been included now that the standard methodology for calculating housing need has been confirmed by Government . It will most likely be refined at examination.		See the new appendix 6 text, table and graph below.

**Schedule 2 – Proposed Changes to GNLP Sites document**

Issue	Policy	Reason for change	Revisions
<b>Site GNLP 0337R, Land between Fir Covert Road and Reepham Road, Taverham</b>			
Correcting strategic site allocation	GNLP 0337R, Taverham	To clarify the site allocation policy.	<p>Add: Including specialist care housing and older persons' housing units</p> <p>Delete: Provision of commercial floorspace adjacent to the Broadland Northway (A 1270)</p>

#### **Appendix 4 Plans to be superseded and plans to be carried forward**

Additional text and table:

GNLP allocations that amend parts of Area Action Plans (AAPs):

<b>GNLP Reference in Sites Document</b>	<b>Site name</b>	<b>Explanation</b>
GNLP0172	Land to the west of Green Lane West Rackheath	This housing site was not allocated within the Growth Triangle AAP.
GNLP0351	Land at Heathwood Gospel Hall, Rackheath	A small part of a Strategic employment site in the Growth Triangle AAP is allocated for housing development through the GNLP.
GNLP0132	Land off Blue Board Lane/Salhouse Road, White House Farm, Sprowston	This strategic scale site was not previously allocated through the Growth Triangle AAP.
GNLP0354R	Land at Johnsons Farm, Wymondham	Additional housing sites in Wymondham which were not allocated in the AAP.
GNLP3013	Land north of Tuttlles Lane, Wymondham	



## **New Appendix 6**

### **Appendix 6 Housing delivery trajectory**

#### **The purpose of the trajectory**

As required by NPPF paragraph 73, the housing delivery trajectory below sets out the potential rate of housing delivery in Greater Norwich during the plan period from 2018 to 2038. Using the number of homes shown in table 6 of this plan, the total housing figure of 49,492 includes a 22% buffer on the local housing need figure. It is important to note that the figure of 49,492 is **potential housing delivery** during the plan period, **not the housing need**. As stated in table 6, the **need is 40,541**. The latter will be used to calculate 5-year housing land supply.

#### **Overall housing delivery 2018 to 2038**

Reflecting table 6 of this plan, the components of the housing trajectory for the 49,492 homes are:

- housing completions during the first two years of the plan, 2018/9 and 2019/20 (5,240 homes);
- the existing commitment of development sites as at April 2020 (31,452);
- new allocations resulting from this plan (10,704);
- delivery of small-scale sites of 3 or 5 homes enabled by Policy 7.5 of the GNLP (800);
- the expected supply of homes by windfall sites (1,296).

#### **Annual delivery figures**

To establish the annual delivery of housing in the vertical bars of the trajectory graph below:

- The most up to date evidence, the current five-year land supply figures, are used for delivery from 2020/2021 to 2024/2025;
- Beyond 2024/5, the undelivered commitment of 18,735 homes is spread evenly across the plan period at the rate of 1,441 dwellings per annum. Using an average delivery rate for the medium to longer-term of the plan period acknowledges the uncertainties about precise completion rates over the next 6 to 18 years;
- The next element of the housing trajectory anticipates when new allocations made by the GNLP are likely to be completed. Assuming adoption of the GNLP in 2022, a suitably cautious approach is to expect the first sites to begin building out in 2023/2024. The trajectory then incrementally accelerates the delivery of homes as sites come on stream until reaching an average rate of 792 homes per annum over the remainder of the plan period;
- The remaining smaller components of the housing trajectory are homes delivered through Policy 7.5 and the windfall allowance. In both instances the delivery of anticipated homes is averaged across the plan period. The difference between these two sources of supply is the likely start dates for delivery.

## Annual targets

The horizontal lines on the graph show:

1. The **whole plan average target per annum of 2,027**. This does not take account of housing delivery in the first two years of the plan period, which was significantly above target.
2. The **residual annual target of 1,961 per annum**. This is the target for the remaining 18 years of the plan period, taking account of delivery between 2018 and 2020. This is the target which will be used to calculate 5-year land supply.

## Trajectory Findings

The housing trajectory is considered a robust projection, especially in the short-term, for the submission of the plan. As time moves on and new evidence emerges, it will be possible to update average delivery rates with more precise projections through the examination of the plan. Updates will be informed by the plan's monitoring framework, the annual five-year land supply and further engagement with development industry representatives.

Feedback from site promoters to date has shown that the majority are confident that their sites can start early and would therefore deliver more quickly than shown in the trajectory. However, given the uncertainty over the medium and longer term, an average is a better illustration of the potential to deliver.

The trajectory illustrates that potential delivery exceeds local housing need in every year.

### Housing Trajectory

Summary Table	Total Allocated Homes	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	Total Delivery	Homes Post 2038
Delivery 2018/2019 and 2019/20	5,240	2,936	2,304																			5,240	0
Existing commitment	31,452			1,987	2,609	3,349	2,621	2,161	1,442	1,442	1,441	1,440	1,440	1,440	1,440	1,440	1,440	1,440	1,440	1,440	1,440	31,452	0
New allocations	10,704						200	400	600	792	792	792	792	792	792	792	792	792	792	792	792	10,704	0
Policy 7.5 delivery	800						54	54	54	54	54	53	53	53	53	53	53	53	53	53	53	800	0
Windfall allowance	1,296								100	100	100	100	100	100	100	100	100	99	99	99	99	1,296	0
																						<b>49,492</b>	

