

# **Regulation 19 Publication Greater Norwich Local Plan Representation Form**

## **What is this stage of the Local Plan about?**

This is the Publication draft version of the Greater Norwich Local Plan (GNLP), also called the Regulation 19 Pre-Submission Draft Plan. Representations at this stage should only be made on the legal compliance and soundness of the GNLP, that is: has the plan been prepared in accordance with all legal and procedural requirements; and does the plan meet the prescribed tests of soundness (see below).

## **Publication period**

The period for submission of representations has been extended to seven weeks **between 09.00 on Monday 1 February and 17.00 on Monday 22 March 2021**. Representations must be received by the Greater Norwich Local Plan Team within this period. No representations will be accepted outside of this period.

## **How to view the documents**

During the representations period, copies of the Greater Norwich Local Plan and other proposed submission evidence base documents will be available to view on the GNLP website at [www.gnlp.org.uk](http://www.gnlp.org.uk)

Due to the coronavirus pandemic, the complete plan and supporting documentation will only be published online in accordance with the latest Government guidance. However, we will endeavour to make limited relevant hard copy material available where possible. Requests should be made by phoning 01603 306603 or emailing [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

## **Submitting representations**

It is easy to respond online at [www.gnlp.org.uk](http://www.gnlp.org.uk) but if you cannot do this please use this form to send us your comments.

Written representations can be submitted by email to [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk) or posted to:

Greater Norwich Local Plan Team  
County Hall  
Martineau Lane  
Norwich  
NR1 2DH

## **Any questions?**

The guidance notes below should answer many of your questions but if you need any further information please contact the Greater Norwich Local Plan team on 01603 306603 or email [gntp@norfolk.gov.uk](mailto:gntp@norfolk.gov.uk). Please note that due to the coronavirus pandemic phone calls will go through to an answering service and we will return your call.

The full Statement of Representations Procedure can be found on the GNLP website at [www.gntp.org.uk](http://www.gntp.org.uk)

## **Guidance Notes to aid completion of the publication stage representation form**

**These guidance notes, produced by the Planning Inspectorate, are intended to assist you in completing the representation form. Please read the notes thoroughly before completing your form.**

### **1. Introduction**

- 1.1 Broadland, Norwich and South Norfolk Councils have published the Greater Norwich Local Plan in order for representations to be made on it before it is submitted for examination by a Planning Inspector. The Planning and Compulsory Purchase Act 2004, as amended [PCPA] states that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the plan that are made by 5pm on Monday 15<sup>th</sup> March 2021.
- 1.2 To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The GNLP authorities will therefore ensure that the names of those making representations can be made available (including publication on the GNLP website) and taken into account by the Inspector.

### **2. Legal Compliance and Duty to Co-operate**

- 2.1 You should consider the following before making a representation on legal compliance:
  - The plan should be included in the Local Planning Authorities [LPA's] current Local Development Scheme [LDS] and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the LPA proposes to bring forward for examination. If the plan is not in the current

LDS it should not have been published for representations. The LDS should be on the LPA's website and available at its main offices.

- The process of community involvement for the plan should be in general accordance with the LPA's Statement of Community Involvement [SCI] (where one exists). The SCI sets out the LPA's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.
- The LPA is required to provide a Sustainability Appraisal [SA] report when it publishes a plan. This should identify the process by which SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- The plan should comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended [the Regulations].

2.2 You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. The LPA will be expected to provide evidence of how they have complied with the duty.
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

### 3. Soundness

3.1 The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- **Positively prepared** – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

- 3.2 If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:
- Is the issue with which you are concerned already covered specifically by national planning policy?
  - Is the issue with which you are concerned already covered by another policy in this plan?
  - If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
  - If the plan is unsound without the policy, what should the policy say?

#### **4. General advice**

- 4.1 If you wish to make a representation seeking a modification to the plan or part of the plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in paragraph 3.1 above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.
- 4.2 You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters that he or she identifies.
- 4.3 Where groups or individuals share a common view on the plan, it would be very helpful if they would make a single representation which represents that view, rather than a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.
- 4.4 Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

**PART A - Personal details\***

\*(If an agent is appointed, you only need to complete the Title, Name and Job Title/Organisation (if applicable) boxes in 1) below but complete the full contact details of the agent in 2).

	<b>1. Personal Details</b>	<b>2. Agents Details (If applicable)</b>
<b>Title</b>		
<b>First Name</b>		
<b>Last Name</b>		
<b>Job Title (where relevant)</b>		
<b>Organisation (where relevant)</b>		
<b>Address</b>		
<b>Post Code</b>		
<b>Telephone Number</b>		
<b>Email Address</b>		

## PART B - Representation

(You can comment on any part of the plan (paragraph, table, diagram, policy or map) but please complete a separate form for each representation you wish to make).

### 3. To which part of the Local Plan does this representation relate?

(Paragraph, table/diagram, policy, map etc)

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### 4. Do you consider the Local Plan is:

Legally compliant	Yes	No
Sound	Yes	No
Complies with the Duty to co-operate	Yes	No

(Please tick as appropriate)

### 5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments

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(Please continue on a separate sheet if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matter you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Please continue on a separate sheet if necessary)

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**At this stage further submissions may only be made if invited by the Inspector, based on matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? (Tick box as appropriate)

No, I do not wish to participate in hearing session(s)	
Yes, I wish to participate in hearing session(s)	

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

**8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary**

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**Disclaimer:**

Data Protection and Freedom of Information:

The Data Controller of this information under the General Data Protection Regulation (GDPR)2018/Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:

- To assist in the preparation of the Greater Norwich Local Plan
- To contact you, if necessary, regarding the answers given in your form

The response forms received as part of the Greater Norwich Local Plan Regulation 19 publication stage will be made available for public viewing and submitted to the Secretary of State to be considered as part of a public examination by an independent planning inspector. By submitting this form you are consenting to your comments being stored by Norfolk County Council and the details being published for consultation purposes.

Once comments have been checked and verified they will be available online (with respondents' names) for others to see. Any representations which are deemed to contain offensive comments will be removed. Whilst we will include names on our website, we will remove personal contact details such as addresses, telephone numbers, emails and signatures before publishing.

Please note that anonymous comments will not be accepted as comments must be attributable for the public examination by the Planning Inspectorate.

See our Privacy notice at [www.gnlp.org.uk](http://www.gnlp.org.uk) for information on how we managed your personal information.

**Declaration**

I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above

**NAME**

**DATE**

**Your completed form should be returned to the Greater Norwich Local Plan team no later than 5pm on Monday 22<sup>nd</sup> March 2021.**

If you have any further questions about the ways to comment, or if you need consultation documentation in larger print, audio, Braille, or an alternative format or a different language, you can email us at [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk) or phone us on 01603 306603.