Dear landowners, agents, and developers

Greater Norwich Local Plan Update: Development Viability and the Process for Preparing Statements of Common Ground for New and Reallocated Sites

On the 16th March the Greater Norwich Local Plan (GNLP) Regulation 18 Draft Strategy and Sites Plan consultation closed. Officers of the GNLP team are now working to progress to the next stage of plan-making. This will be the Regulation 19 Pre-Submission version of the plan, scheduled for publication in early 2021.

I am emailing you because your site is either a preferred option or reasonable alternative to allocate in the draft GNLP, or an existing site proposed for reallocation.

In order to select your site through the GNLP, we will need clear evidence that it will be able to provide for the policy requirements of plan covering issues such as affordable housing. However, given the uncertainty for the development industry the current international health crisis has created, this email is intended to inform you of future steps in plan-making rather than asking for additional evidence now.

The GNLP team will contact you again in September. We will then ask you for evidence of financial viability and commitment to meet the GNLP plan requirements. This will take the form of a Statement of Common Ground (SoCG) between site promoters and the GNLP team about each new and reallocated site for submission to the local plan inspector.

The importance of agreeing a Statement of Common Ground should not be underestimated – without it a site is highly unlikely to be allocated in the GNLP. The content of each Statement of Common Ground will vary depending upon each site’s unique circumstances but in broad terms will be likely to include:

- matters agreed and how any outstanding issues that may constrain development can be resolved;
- details of marketing activity and information on who will be the site’s developer;
- timescales for when development will happen and evidence for why delivery forecasts are realistic; and,
- confirmation that the site is viable when taking account of all planning policies (including policy requirements as proposed in the GNLP).
If you have already submitted such detailed information to the GNLP team for your site, it may be that further evidence will not be required.

The approach being taken by the GNLP team reflects how viability and deliverability is treated by planning inspectors at local plan examinations. This in turn reflects the government’s recently adopted approach that development viability is a matter to be dealt with by plan-making and not deferred to the planning application stage. Under current Planning Practice Guidance, the circumstances by which development viability can be argued to justify an exception to up-to-date local plan policies are limited.

Utilising all the information already published online about the GNLP -- at www.gnlp.org.uk – is highly encouraged. The strategic direction of policies and site selection is evident in the documents already published. Details of a forthcoming review of Community Infrastructure Levy (CIL) is currently intended to be timed to coincide with the process of agreeing Statements of Common Ground in the autumn.

I hope this letter gives clarity to the GNLP’s approach to plan-making and development viability. These matters will be kept under review as economic conditions change. In the meantime before I contact you again in September, any questions about this letter or the GNLP process are of course welcome as usual.

Yours faithfully,

Adam Banham
Greater Norwich Local Plan Team