

GREATER NORWICH LOCAL PLAN EXAMINATION

INSPECTORS' INITIAL QUESTIONS

1. This note sets out some initial questions which we would like to ask the Partnership as part of the early stage of the examination of the Local Plan. The responses to these questions will help us define the Matters, Issues and Questions.
2. We would be grateful if the Partnership could let the Programme Officer know by 25 October 2021 when it will be in a position to respond to these initial questions. This will help us programme when we will be able to issue our Matters, Issues and Questions and consider the timeline for the remainder of the examination. We would be happy to receive staged responses so that answers to some questions are not held up whilst work may be undertaken on others.
3. As well as these initial questions, the Topic Papers submitted to us should be placed upon the Examination website as a matter of urgency.
4. We will issue a Guidance Note around the same time as we issue Matters, Issues and Questions.

Duty to Co-Operate

5. In its response to the Regulation 19 submission, Breckland District Council says that the Duty to Co-operate has not been met. The Duty to Co-Operate Statement published by the Partnership in July 2021 says that information regarding Breckland District Council is awaited. Can the Partnership please provide evidence that the Duty to Co-Operate has been met, ideally through a statement of common ground with Breckland District Council?

Consultation

6. In some of the representations made, it is alleged that a number of Town and Parish Councils, and those who had previously commented on the draft Local Plan at Reg 18 stage, were not notified of the Reg 19 consultation. Please could the Partnership clarify the position?

Sustainability Appraisal (SA)

7. Each of the 'reasonable alternatives' identified in the Sustainability Appraisal for the housing requirement include a 20% delivery buffer (which includes the windfall allowance in some scenarios). In our view, the Sustainability Appraisal should also model both smaller and minimal supply buffers as 'reasonable alternatives'. Please could the Partnership prepare an addendum to the Sustainability Appraisal to address this point.

South Norfolk Village Clusters Housing Site Allocations Plan (VCHAP)

8. Why has the decision been taken to produce a separate allocations plan for some villages in South Norfolk rather than making allocations within the GNLP?
9. What are the implications for the GNLP if the VCHAP gets delayed, or is not able to allocate sites for 1200 new homes which can be delivered within the plan period?

Neighbourhood Plans

10. Can the Partnership provide an update on the progress of neighbourhood plans being prepared within the GNLP area?
11. The Diss and area Neighbourhood Plan is expected to identify sites for around 250 homes. What are the implications for the Local Plan if the neighbourhood plan does not progress or does not identify sites for 250 homes which can be delivered within the local plan period?

Housing

12. The housing policy figure includes an upward adjustment of around 9000 new homes 2018 -2038 when compared to the requirement identified by the 2014 based household projections. Paragraph 178 of the submitted Local Plan states that the potential growth indicated by the 2018 based projections would equate to the identification of an additional 5000 homes. The proposed policy adds another 4000 on top of that. Can the partnership direct us to the evidence which provides justification for this level of additional provision beyond the housing requirement?

13. The submitted Local Plan includes a housing trajectory from 2018/19 to 2037/38. The Homes Topic Paper includes an appendix which sets out the housing delivery forecasts for each of the three local authority areas. These three tables do not appear to be necessarily consistent. For example, the Norwich area table includes references to 'in-commitment' sites whereas the other two tables do not. In addition, there are no housing figures set in the 'in-commitment' rows. Can the partnership provide clarity on these matters please?
14. Can the Partnership please confirm that there is a common consistent system of completion data monitoring and collection across the Plan area?
15. The GNLP proposes to re-allocate a number of sites that were previously allocated for housing under previous plans. In what year were these sites originally allocated? Why have they not come forward as originally envisaged?
16. Can we be directed to the evidence which supports the position that 31,452 units will come forward on existing allocations or commitments during the plan period?
17. Can we be directed to the evidence which supports the assumed windfall contribution.
18. Can you direct us to, or confirm the position with, the statements of common ground for the development sites which are referred to on the Council's response to the summary of representations?

Costessey Contingency Site

19. What is the evidence which supports the Costessey site as a contingency site in the Local Plan? Why was the specific trigger mechanism set out in Policy GNLP0581/2043 chosen?
20. Where is the evidence which supports the requirement for a school and local centre on it? If the site is not required what happens to the need for a school since presumably it would be serving the needs of a greater population than the site?

East Norwich Strategic Regeneration Area

21. This area is forecast to deliver 4,000 dwellings within the plan period. However, most of this area does not currently have planning permission and parts of it are described as being “constrained”. How was the figure of 4,000 dwellings derived, and what net developable areas and densities are assumed in order to reach this figure? Have all of the main landowners confirmed that this site is available for development?
22. Can we be directed to the evidence which demonstrates that 4000 new homes within the East Norwich Strategic Regeneration Area are viable and deliverable within the Plan period?
23. The Level 2 Strategic Flood Risk Assessment identifies that significant areas of this site are within Flood Zones 2 and 3 (including 3b). Is this reflected in the delivery assumptions for this site?

Gypsy and Traveller sites

24. The Greater Norwich Development Partnership Board 24 June 2021 resolved to ‘commit to proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs in accordance with the criteria-based policies of the current and emerging Development Plans’. The Homes Topic Paper provides more information on this work.
25. How does the Partnership expect this to be taken forward given it has submitted a plan which it considers to be sound? What are the timescales involved in this work? The Homes Topic Paper says that by the time that the Plan reaches examination the pipeline of pitches is likely to have expanded. However, the Plan is currently in examination. What is the expected outcome of this work? What are the implications of this work and its timescales for the examination of the plan and the arrangements for hearing sessions?
26. The Homes Topic Paper states that a Statement of Common Ground is to be produced in respect of Travelling Showpersons sites. What are the timescales for this?

Policy 7.5 - Windfall sites

27. Would the parish dwelling limit include permissions that have already been granted since the start of the plan period?
28. How would this policy operate in the event that several applications were submitted at once in a single parish?
29. What evidence has been used to arrive at the assumed contribution of 800 dwellings from this source?
30. The Topic Paper on Windfall Sites refers to Reepham Whitwell and Reepham Hackford being errors in policy which will be corrected in the adopted plan. What are these errors and what is meant by them being corrected in the adopted plan?
31. Is the Partnership able to provide any clarification as to what 'positive consideration will be given to self and custom build' means in Policy 7.5?

Employment Land

32. Does the definition of, and the approach to, 'employment land' reflect the recent introduction of Class E into the Use Classes Order?

Western Link

33. Can the Partnership please confirm the status of the Western Link referred to in the Local Plan in Policy 4 and within the Glossary? Is the delivery of the development provision set out in the Local Plan, or any part of it, dependent upon the completion of this road?

Thomas Hatfield and Mike Worden

INSPECTORS October 2021