

Greater Norwich Local Plan Statement of Consultation

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1 Introduction

1.1 This Consultation Statement has been prepared to support the preparation of the Greater Norwich Local Plan. The statement sets out how Broadland District Council, Norwich City Council and South Norfolk Council, working together as the Greater Norwich Development Partnership (GNDP), along with Norfolk County Council and the Broads Authority, have involved communities and stakeholders in preparing the Greater Norwich Local Plan, and how this meets national regulations and the requirements set out in the Councils' Statements of Community Involvement.

1.2 The Statement of Consultation is a statutory requirement for Local Planning Authorities in the process of submitting a Local Plan to the Secretary of State and describes how the Council has complied with government requirements in line with the Town and Country Planning (Local Planning) (England) Regulations 2012. The statement contains:

- An overview of the engagement activities undertaken during each stage of the Local Plan making process to date, including which bodies and persons were invited to make representations under Regulation 18;
- Summaries of the main issues raised through the engagement activities.

2 The Greater Norwich Local Plan

2.1 The Greater Norwich Development Partnership began preparing a new Local Plan for the area in 2016.

- 2.2 The Greater Norwich Local Plan (GNLP) sets out the strategy for growth in Greater Norwich along with the sites to deliver the strategy. The plan will be used to help to assess planning applications.
- 2.3 The plan runs from 2018 to 2038. It provides up-to-date policies to guide development in rapidly changing times and meets Government requirements set out in the National Planning Policy Framework (NPPF¹). It has been prepared ahead of the implementation of the new system for plan-making Government has committed to introducing. It is highly likely that the GNLP will be superseded by a new local plan produced under the new planning system within a few years of its adoption.
- 2.4 The Greater Norwich Local Plan will replace:
- The Joint Core Strategy for Broadland, Norwich and South Norfolk (2011 and subsequently readopted 2014);
 - Broadland Site Allocations Development Plan Document (2016);
 - Norwich Site Allocations and Site-Specific Policies Local Plan Document (2014); and
 - South Norfolk Local Plan Site Specific Allocations and Policies Document (2015).

3 Plan production timetable

- 3.1 The timetable below outlines the main stages of the plan-making process we have followed, along with the estimated timetable to adoption of the plan.

Stage		Dates
Call for Sites		May - July 2016
Regulation 18 Preparation Stage		
Stage A	Growth Options & Site Proposals consultation	January - March 2018
Stage B	New, Revised and Small Sites consultation	October - December 2018
Stage C	Regulation 18 Draft Plan consultation	January – March 2020
Regulation 19 Publication Stage		
Pre-submission Draft Plan for representations on soundness and legal compliance		February – March 2021
Regulations 22 to 26 Submission, Examination and Adoption Stages		
Submission of GNLP to the Secretary of State		July 2021
Public Examination		November/December 2021
Adoption of the Greater Norwich Local Plan		September 2022

- 3.2 We are currently at the Regulation 19 Publication stage.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

4 Public and stakeholder engagement

4.1 Statements of Community Involvement

4.1.1 Throughout the key plan-making and consultation stages we have liaised with relevant stakeholders and individuals to assist with the preparation of the plan and resolve issues.

4.1.2 The councils' adopted Statements of Community Involvement (SCI) set out how the councils intend to engage with members of the public and stakeholders in relation to planning, including the preparation of local plans. The SCIs require a range of different engagement methods to be used across the community, to try to ensure that everyone has the opportunity to comment. The Councils have made every effort to ensure that the Local Plan engagement process was in line with the adopted SCIs, which have been amended to take account of the circumstances created by the coronavirus pandemic. The councils' SCIs can be found at:

- Broadland District Council: https://www.broadland.gov.uk/downloads/download/186/statement_of_community_involvement
- Norwich City Council: https://www.norwich.gov.uk/downloads/file/2269/statement_of_community_involvement_adopted_version
- South Norfolk Council: <https://www.south-norfolk.gov.uk/residents/planning-and-building/planning-policy/statement-community-involvement>

4.2 Duty to cooperate

4.2.1 The production of a joint Local Plan by the three authorities, working with Norfolk County Council and the Broads Authority, through the Greater Norwich Development Partnership demonstrates a very high degree of cooperation.

4.2.2 In addition, Norfolk's Local Planning Authorities, including the County Council and the Broads Authority, have a long track record of working together to achieve shared objectives. Officer level engagement on cross boundary matters takes place through the Norfolk Strategic Planning Group (NSPG) which meets monthly. In early 2015 the authorities agreed to cooperate formally on a range of strategic cross-boundary planning issues through the preparation of the Norfolk Strategic Planning Framework (NSPF). The Norfolk Strategic Planning Member Forum oversees the production of the NSPF on behalf of all the local planning authorities. See <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/norfolk-strategic-planning-member-forum>

4.2.3 The NSPF and the Member Forum provide a key mechanism for cooperation and engagement between the LPAs and with surrounding counties (in our case within Suffolk), statutory bodies and technical consultees. It provides a structure for tackling planning issues across the county, especially those which have a strategic impact across local authority boundaries. It includes guidance relating to housing, economic growth, infrastructure and the environment. The NSPF is agreed by all the authorities and informs and supports our Local Plans.

5 Key plan-making stages and consultations

5.1 Review of Joint Core Strategy and identification of key issues

5.1.1 Councils agreed to produce a new plan in 2015. Subsequently existing policies were reviewed and gaps in policies or evidence bases were identified. Research and commissioning of evidence studies was begun.

5.2 Call for sites

5.2.1 A “Call for Sites” was held during the spring and summer of 2016. This enabled those who wished to promote parcels of land for a particular use or development to submit this land for consideration for potential allocation in the GNLP. Possible land uses included housing, employment, leisure and community uses.

5.2.2 Sites continued to come forward throughout the plan-making process.

5.3 Regulation 18

5.3.1 Stage A: Growth Options and Site Proposals consultation

5.3.1.1 Between Monday 8 January and Thursday 22 March 2018 we consulted on “Site Proposals” – more than 600 sites suggested to us by developers and landowners. This was accompanied by a “Growth Options” consultation on strategic policies to guide how and where different kinds of development might be distributed over the whole area.

5.3.1.2 The consultation was made up of a number of documents:

- The Growth Options document;
- The Site Proposals document;
- The Interim Sustainability Appraisal; and
- The Evidence Base, including the Caravans and Houseboats Study; the Employment, Town Centre & Retail Study; the Interim Habitats Regulation Assessment; a New Settlements Topic Paper; the Strategic Flood Risk Assessment; the Strategic Housing Market Assessment (SHMA); part 1 of the Viability Study and the Housing and Economic Land Availability Assessment (HELAA) for submitted sites.

5.3.1.4 All the above documents were available to view and comment on online at www.gnlp.org.uk. Paper/email responses were also accepted to ensure that everyone had an equal chance to have their say. Hard copy documents were made available at district and county council offices, libraries and roadshows.

5.3.1.5 A comprehensive advertising and promotion campaign took place in line with the GNLP’s agreed communications protocol (see Appendix 1 – Communications Protocol, Greater Norwich Development Partnership Board papers).

5.3.1.6 Nearly 1,400 people attended 29 roadshow events across the Greater Norwich area.

5.3.1.7 Over 8,000 representations, evenly matched between sites and strategy, were received.

5.3.1.8 A further 180 sites were submitted and 22 revisions to existing sites were proposed.

5.3.1.9 The consultation provided valuable information from technical stakeholders and the public which assisted in further evidence gathering and developing policies for the draft plan. Key findings were:

- There was greater support for the concentration of development around Norwich and in transport corridors than there was for more dispersed growth;
- Mixed views were expressed on the potential for a new settlement;
- There was more support than opposition to a new Green Belt, with a wedge-based approach being favoured. However, a significant minority stated that the 'exceptional circumstances' required by Government for a Green Belt do not exist;
- Further consideration to be given to housing numbers. Contrasting views were expressed that higher numbers are required to meet needs or that the number should be lower as existing allocations should be developed first and any new sites should be held in reserve;
- Similarly, there were mixed view on jobs growth, with a small majority favouring 'enhanced growth';
- The approach taken to the settlement hierarchy would also need to be considered further. There was broad support for retaining the current approach to the settlement hierarchy tiers, with the concept of 'Village Groups' having limited support;
- The vast majority argued that additional infrastructure would be required as a result of growth, with some stating that this was a reason to limit growth. Many responses focussed on health, transport, schools and water and the need for a comprehensive infrastructure evidence base.

5.3.1.10 Reports to the GNLP Board on this stage of the consultation can be found at Appendix 2 and Appendices 3a and 3b.

5.3.2 Stage B: New, Revised and Small sites consultation

5.3.2.1 A focussed consultation encompassing new and revised sites which had come forward took place from 29 October to 14 December 2018. It covered 235 sites: 181 new sites, 26 revised and 28 small sites (151 in South Norfolk, 72 in Broadland, 12 in Norwich and 1 cross-boundary site between South Norfolk and Broadland at Honingham).

5.3.2.2 A summary of the sites for each parish was presented along with a map of each site. To help people in making their comments, more detailed summaries for each site were provided in the Housing and Economic Land Availability Assessment (HELAA) which was available as part of the evidence base and showed how submitted sites performed in an initial desk-based assessment of constraints.

5.3.2.3 Consultation documents were available to view and comment on online at www.gnlp.org.uk. Paper/email responses were also accepted to ensure that everyone had

an equal chance to have their say. Hard copy documents were made available at district and county council offices, libraries and roadshows.

5.3.2.4 Promotion of the consultation took place in line with the GNDP's agreed protocol.

5.3.2.5 In total 1,298 respondents made over 2,500 individual representations. Of the individual representations made, some 2,000 were submitted online, with over 400 being made via email and on paper. Over 2,000 of the representations received were objections.

5.3.2.6 Key findings: in addition to comments on specific sites, in common with the first sites consultation in early 2018, many respondents focussed on infrastructure needs including health, transport, schools and water. The issues raised have been considered in developing the GNLP.

5.3.2.7 58 further sites were submitted during the consultation.

5.3.2.8 More detail can be found in the consultation report to members at Appendix 4.

5.3.3 Stage C: Stage C Regulation 18 Draft Strategy and Site Allocations

5.3.3.1 The consultation, which ran for a period of six weeks between January and March 2020, was comprised of:

- a strategy document which contained the planning strategy for growth in Greater Norwich from 2018 to 2038 along with thematic policies;
- a site allocations document containing sites proposed to be allocated for development to help implement the growth strategy. It contained site specific policies for all sites other than the village clusters in South Norfolk;
- a comprehensive suite of supporting evidence.

5.3.3.2 This consultation excluded South Norfolk villages which are subject of a separate South Norfolk Villages Clusters Housing Site Allocation Document prepared by South Norfolk Council.

5.3.3.3 More than 1,150 people attended 14 consultation events. This compares to 1,400 people who attended 29 roadshows for the Growth Options consultation in early 2018.

5.3.3.4 Plan documents were posted online at www.gnlp.org.uk and hard copies were made available at district and county council offices, libraries and roadshows.

5.3.3.5 There was a comprehensive publicity campaign in line with the GNDP's agreed protocol.

5.3.3.6 Representations were made online and via email and post.

5.3.3.7 The consultation was completed prior to entering lockdown. Whilst this had the advantage of consultation events not being impacted by the pandemic, it also meant that the consultation responses did not address the impact of Covid19 on emerging policies.

5.3.3.8 There was a good level of response to the consultation. Over 3,300 representations were received, of which some 1,500 related to the strategy and over 1,700 were in response to

the sites plan. Some 1,200 representations were objections, 890 were in support and there were over 1,200 comments. A broad range of views were expressed from a wide cross section of community, political and professional organisations and large numbers of individuals.

- 5.3.3.9 More respondents, largely individuals, commented on the sites than the strategy. However, partly due to the large number of representations made on a broad range of issues by community, political and professional organisations, the number of representations received for the strategy and sites were broadly similar. While there were limited representations on the evidence base, these were largely detailed and technical.
- 5.3.3.10 Key findings: the main issue raised was health care provision, with the need for other infrastructure also a key concern. Additionally, the need for better public transport services was regularly raised. There was some criticism of the consultation process and website.
- 5.3.3.11 A report to the GNPD Board on the representations received can be found at Appendix 5.
- 5.3.3.12 Summaries of representations and responses setting out plan changes in respect of the draft strategy are attached at Appendix 6 and the sites document at Appendices 7a – 7g.

5.4 Regulation 19 Publication Stage

- 5.4.1 In accordance with regulations, this is a formal part of the plan-making process which specifically seeks comments from members of the public, stakeholders and other organisations, in relation to the Plan's soundness for examination in public and legal compliance. We are currently at this stage which is taking place for six weeks from 1 February 2021 to 15 March 2021.
- 5.4.2 Documents have been published online at www.gnlp.org.uk. There are two parts to the Publication draft of the GNLP:
- The first is the Publication draft GNLP Strategy. It contains the planning strategy for growth in Greater Norwich from 2018 to 2038.
 - The second is the Publication draft GNLP Sites document. It has planning allocation policies for the sites to deliver the strategy.
 - In addition, the plan documents are supported by a Sustainability Appraisal which evaluates the draft plan and other evidence which is also available for comment on soundness and legal compliance.
- 5.4.3 Details of how to comment, along with definitions of legal compliance and soundness, have been posted on our website at www.gnlp.org.uk.
- 5.4.4 Publicity for this stage of public engagement has been in line with the agreed GNPD protocol, amended to take account of the coronavirus pandemic.

6 Next Steps

6.1 Submission to the Secretary of State

- 6.1.1 Comments received at the Regulation 19 plan-making stage will be considered by the partner councils before they decide whether to submit the Plan to the Government for independent examination. If the Plan is submitted, the comments will also be provided to the Inspector to consider as part of their examination of the Plan. This is expected to happen in July 2021.

6.2 Examination

- 6.2.1 The Plan will be examined by an independent planning inspector who will conduct an examination in public including examination hearings which will be chaired by the inspector who will set out the agenda for each hearing and determine who is invited to participate. There is no fixed date for this as yet as the timetable is determined by the Planning Inspectorate. It is anticipated it will take place around November/December 2021.

6.3 Adoption

- 6.3.1 If the independent Planning Inspector finds the Local Plan sound, the Plan can be adopted by the Authority. If the Inspector does not find the Local Plan sound, or recommends that proposed modifications will be required, the changes to the plan will be subject to consultation and additional examination hearings may be necessary before the plan can be adopted.