

Greater Norwich Local Plan

Statement of Consultation

June 2021

Greater Norwich Local Plan Statement of Consultation

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Introduction

1. This Consultation Statement has been prepared to support the submission of the Greater Norwich Local Plan (GNLP). 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.
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 Councils have 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.

The Greater Norwich Local Plan

3. The GNDP began preparing a new Local Plan for the area in 2016.
4. The 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.
5. 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 It is highly likely that the GNLP will be superseded by a new local plan produced under the new planning system within a few years of its adoption.
6. 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);

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

- Norwich Site Allocations and Site-Specific Policies Local Plan Document (2014); and
- South Norfolk Local Plan Site Specific Allocations and Policies Document (2015).

Plan Production Timetable

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

Stage	Date
Call for Sites	May - July 2016
Regulation 18 Preparation Stage	
Stage A Growth Options & Site Proposal consultation	January – March 2018
Stage B New, Revised and Small Site consultation	October to 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 – current stage	July 2021
Public Examination	July 2021
Adoption of the Greater Norwich Local Plan	September 2022

8. We are currently at the ‘Submission of GNLP to the Secretary of State’ stage.
9. The GNLP timetable is reflected in the authorities’ Local Development Schemes (LDS) which can be found at:
- Broadland and South Norfolk Councils
<https://www.southnorfolkandbroadland.gov.uk/future-development/local-development-scheme-3>

- Norwich City Council
https://www.norwich.gov.uk/info/20225/planning_policies_supporting_documents/1505/local_development_scheme

Public and Stakeholder Engagement

Statements of Community Involvement

10. 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.
11. 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 and South Norfolk Councils:
<https://www.southnorfolkandbroadland.gov.uk/statement-community-involvement>
 - Norwich City Council:
https://www.norwich.gov.uk/downloads/file/2269/statement_of_community_involvement_adopted_version

Duty to Cooperate

12. 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.
13. 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>

14. 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.
15. In addition, the councils have also worked with statutory Duty to Cooperate consultees as outlined in the Duty to Cooperate Topic Paper and relevant Statements of Common Ground.

Key Plan-making Stages and Consultations

Review of Joint Core Strategy and Identification of Key Issues

16. 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.

Call for Sites

17. 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.
18. Further sites have continued to come forward throughout the plan-making process.

Regulation 18

Stage A: Growth Options and Site Proposals Consultation

19. 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 types of development might be distributed over the plan area. The consultation was originally intended to finish on 15 March but an additional week was added in response to requests to allow people more time to respond after the final roadshow events finished.
20. 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.
21. 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 and information was sent out to people on request.
 22. A comprehensive advertising and promotion campaign took place in line with the GNDP's agreed communications protocol (see Appendix 1 – Communications Protocol, Greater Norwich Development Partnership Board papers – 30 January 2017). This included the distribution of posters and summary leaflets to libraries, doctors' surgeries, parish and town councils and information points and the use of large outdoor posters near event locations and other key sites. Information was also displayed digitally at some bus stops. Press releases were issued prior to commencement of the consultation with updates during and after the consultation. Twitter and Facebook were also used to advertise roadshow events and report progress with the consultation.
 23. A number of different groups of people were consulted by email/post including duty to cooperate consultees and specific and general consultation bodies. General consultation bodies included town and parish councils, agents and developers, members of the public, community groups and organisations and utility and service providers.
 24. Nearly 1,400 people attended 29 roadshow events across the Greater Norwich area, an average of 47 per event. These figures are almost certainly an underestimate as it was difficult to ensure all visitors were recorded at busier venues. The exhibitions featured display boards, pop ups and posters and were staffed by officers from the GNLP team who were on hand to answer questions. The roadshows were clearly advertised via posters, media articles and press advertisements and reminder emails were sent to town and parish councils in the lead up to the events in their area. Flyers and business cards were available for people to take away from the events giving the website address.
 25. Over 8,000 individual representations, evenly matched between sites and strategy, were received to the stage A consultation. In total 4,264 responses to individual questions in the Growth Options document were received, 2,464 responses (58%) were made online with 1,800 (42%) of responses submitted via paper/email. In the case of the Site Proposals document there were 3,778 individual representations of

which 3,102 (82%) were made online with 454 (12%) by email and 222 (6%) on paper.

26. A further 180 sites were submitted and 22 revisions to existing sites were proposed through the consultation.
27. Consultation on the Growth Options document provided valuable information from technical stakeholders and the public which assisted in further evidence gathering and developing policies for the draft plan. For further information about how consultation comments were taken into account see the topic papers produced for each main policy in the plan. The key findings from the Growth Options consultation 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.
28. Reports to the GNDP Board on this stage of the consultation can be found at Appendix 2 and Appendices 3a and 3b. Appendix 2 is a high-level report on the consultation from the GNDP meeting held on 19 June 2018. Appendices 3a and 3b are a more detailed report of consultation comments presented to the GNDP on the 26 September 2018 in the form of a draft Statement of Consultation. These appendices contain further detail on how the consultation was publicised, the roadshow events and the main responses received to the growth options consultation.

29. Appendix 4 contains summaries of all the responses received to the consultation on the Site Proposals document. These comments were taken forward and considered during the detailed site assessment process which took place prior to the Regulation 18 C public consultation on the draft plan. For more detail regarding how comments on sites were taken into account see site assessment booklets for each settlement.

Stage B: New, Revised and Small Sites Consultation

30. A focussed consultation encompassing new, revised and small 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).
31. 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.
32. 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 and libraries, with information being sent out to people on request. Due to the focussed nature of this consultation there were no roadshow events.
33. Promotion of the consultation took place in line with the GNDP's agreed protocol (see Appendix 1 – Communications Protocol, Greater Norwich Development Partnership Board papers – 30 January 2017).
34. A number of different groups of people were consulted by email/post including duty to cooperate consultees and specific and general consultation bodies. General consultation bodies included town and parish councils, agents and developers, members of the public, community groups and organisations and utility and service providers.
35. In total 1,298 respondents made over 2,500 individual representations. Of the individual representations made, some 2,000 (81%) were submitted online, with over 400 (19%) being made via email and on paper.
36. 58 further sites were submitted during the consultation.
37. 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.

38. More detail can be found in the high-level consultation report submitted to members at the 29 January 2019 GNDP meeting (see Appendix 5).
39. Appendix 6 contains summaries of all the responses received to the consultation on the New, Revised and Small Sites consultation. These comments were taken forward and considered during the detailed site assessment process which took place prior to the Regulation 18 C public consultation on the draft plan. For more detail regarding how comments on sites were taken into account see site assessment booklets for each settlement.

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

40. 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, including an Equalities Impact Assessment, an updated Housing and Economic Land Availability Assessment, Interim Habitats Regulation Assessment, Sustainability Appraisal, interim Viability Study and interim draft Water Cycle Study
41. 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.
42. 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 and information was sent out to people on request.
43. Promotion of the consultation took place in line with the GNDP's agreed protocol (see Appendix 1 – Communications Protocol, Greater Norwich Development Partnership Board papers – 30 January 2017). This included the distribution of posters and summary leaflets to libraries, parish and town councils and information points and the use of large outdoor posters near event locations and other key sites. Press releases were issued prior to commencement of the consultation with updates during and after the consultation. Twitter and Facebook were also used to advertise roadshow events and report progress with the consultation.

44. A number of different groups of people were consulted by email/post including duty to cooperate consultees and specific and general consultation bodies. General consultation bodies included town and parish councils, agents and developers, members of the public, community groups and organisations and utility and service providers.
45. 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. The exhibitions featured display boards, pop ups and posters/flyers and were staffed by officers from the GNLP team who were on hand to answer questions.
46. The consultation was completed prior to entering Covid-19 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.
47. There was a good level of response to the consultation. Over 3,300 individual 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. Of the total number of representations 1,755 (52%) were submitted online, 1,520 (46%) were submitted via emails and 58 (2%) were submitted by post. A broad range of views were expressed from a wide cross section of community, political and professional organisations and large numbers of individuals.
48. 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.
49. In total 61 new sites were submitted (37 in Broadland and 24 in South Norfolk) and 38 revisions to existing sites.
50. A high-level summary report of the Regulation 18 C consultation was taken to the GNLP Board on 10 July 2020 (see appendix 7). This included a table showing the GNLP officer team's current consideration of the most significant issues raised in the consultation with an initial response.
51. 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.

52. Summaries of representations and responses setting out how issues raised have been taken into account and any plan changes proposed in respect of the draft strategy and evidence base are attached at Appendix 8 and the sites document at Appendices 9a – 9g. Further information about the development of policy and site selection can be found in topic papers and site assessment booklets.

Regulation 19 Publication Stage

53. The Regulation 19 publication stage took place for seven weeks from 1 February 2021 to 22 March 2021. 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.

54. 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 including site assessment booklets, an updated Equalities Impact Assessment, Green Infrastructure Study, Habitats Regulation Assessment, an updated Housing and Economic Land Availability Assessment, Statement of Consultation, Strategic Flood Risk Assessment Level 2, Viability Appraisal and Water Cycle Study.

55. Details of how to comment in the form of a Statement of Representations, along with definitions of legal compliance and soundness and a downloadable response form, were available on our website at www.gnlp.org.uk. Comments were encouraged to be submitted online but email and postal responses were also accepted to allow everyone the chance to have their say.

56. Publicity for this stage of public engagement has been in line with the agreed GNLP protocol (Appendix 1), amended to take account of the coronavirus pandemic. Following Government advice there was no requirement to make copies of documents available at premises or to provide hard copies on request, however, we did endeavour to provide information to those that requested it.

57. A number of different groups of people were consulted including duty to cooperate consultees and specific and general consultation bodies. General consultation bodies included town and parish councils, agents and developers, members of the public, community groups and organisations and utility and service providers.

58. Out of 3,000 emails sent out at Regulation 19 there were 150 'bounce-back' messages. Where these were agents or other businesses where the addressee no longer existed at the organisation or was on furlough we checked to see if another person in the organisation had been successfully contacted. If there was no successful contact within the organisation, we investigated alternative emails and forwarded the original email, updating our consultation system accordingly. Some of the rejected emails were for members of the public. For this group it would have been impossible to know the reason for rejection, so it was not possible to seek alternative email addresses.
59. In total there were 1,316 individual representations received at Regulation 19 (263 supports and 1053 objections). Of the 1,316 representations 521 (40%) were submitted online, 768 (58%) were by email and 27 (2%) were by post.
60. No representations have been made that, in the view of officers, would require further Regulation 18 consultation or a repeat of the Regulation 19 stage. The Key findings can be split into two main areas: firstly, those being addressed ahead of submission and beyond and secondly, those that could be potential issues for discussion at the examination depending on the view of the Inspector.
61. It is anticipated that a number of main issues raised through representations will be addressed either prior to or subsequent to submission. These are issues on which some agreement can be made and addressed through Statements of Common Ground. These include:
- Duty to Cooperate issues;
 - Lack of Gypsy and Traveller sites to address evidenced needs;
 - Evidence updates including Heritage Assessments in response to a request from Historic England, more detail on the timing of site delivery in the housing trajectory, supplementary viability information, updated information on housing including the types of homes required and updating the Habitat Regulations Assessment in relation to GIRAMS and the Water Cycle Study;
 - Minor modifications to text (not the policies themselves) mainly to address representations from Historic England, Natural England, the Environment Agency and Anglian Water.
62. The actual issues for the examination will be determined by the Inspector but these could include:
- The site selection process, including the role of Sustainability Appraisal;
 - The role and timing of dependent plans such as the South Norfolk Village Clusters Plan;
 - Changes made between Regulation 18 and 19 and the lack of a Regulation 18D consultation;
 - Overall housing growth figures and the location of growth;
 - Significant site objections e.g. East Norwich, Aylsham, Hingham, Foulsham;
 - Norwich Western Link and its inclusion in the plan;
 - Climate Change;
 - Infrastructure;
 - Housing issues such as the affordable housing requirement, space standard, the needs of elderly people and self/custom build;

- Questions regarding the evidence base particularly in relation to the Viability Study, Habitats Regulation Assessment, Water Cycle Study and Sustainability Appraisal.
63. Further detail regarding the main issues raised at Regulation 19 can be found in the Submission of the Greater Norwich Local Plan Report taken to the GNDP Board on 24 June 2021 (Appendix 10).
64. Summaries of the representations received and an initial response/change to plan from the Council can be found in Appendix 11.

Next Steps

Submission to the Secretary of State

65. Comments received at the Regulation 19 stage have been considered by the partner councils and a decision made to submit the Plan to the Government for independent examination. The comments will be provided to the Inspector to consider as part of their examination of the Plan. Submission of the plan will take place at the end of July 2021.

Examination

66. 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 currently scheduled to take place around November/December 2021.

Adoption

67. If the independent Planning Inspector finds the Local Plan sound, the Plan can be adopted by the Authorities. 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.

List of Appendices

Appendix 1, Communications Protocol

Greater Norwich Development Partnership Board Papers – 30 January 2017

Appendix 2, High Level Report on the Regulation 18 A Consultation

Greater Norwich Development Partnership Board Papers – 19 June 2018

Appendices 3a and 3b, Detailed Report of Regulation 18 A Consultation Comments on the Growth Options

Greater Norwich Development Partnership Board Papers – 26 September 2018

Appendix 4, Summaries of Responses Received to the Regulation 18 A Site Proposals Document

Appendix 5, High Level Report on the Regulation 18 B Consultation

Greater Norwich Development Partnership Board Papers – 29 January 2019

Appendix 6, Summaries of Responses Received to the Regulation 18 B Site Proposals Document

Appendix 7, High Level Summary Report on the Regulation 18 C Draft Plan Consultation

Greater Norwich Development Partnership Board Papers – 10 July 2020

Appendix 8, Regulation 18 C Strategy and Evidence Rep Summaries and Responses

Appendix 9a – 9g, Regulation 18 C Sites Plan Rep Summaries and Responses

(split by hierarchy)

Appendix 10, Submission of the Greater Norwich Local Plan Report

Greater Norwich Development Partnership Board Papers – 24 June 2021

Appendix 11a – 11c, Regulation 19 Strategy, Sites and Evidence Base Representation Summaries and Responses