

# Greater Norwich Local Plan

## Topic Paper: Policy 1 Growth Strategy

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## Summary

This topic paper outlines the evolution of policy 1 of the Greater Norwich Local Plan (GNLP) which provides the plan's overall sustainable growth strategy. It describes the reasons for the strategic approach taken in the GNLP, covering the amount and distribution of growth, including the plan's settlement hierarchy.

The paper shows that the plan will ensure that Greater Norwich's housing and jobs needs from 2018 to 2038 will be fully met in a sustainable manner, supporting the growth of the post carbon economy in the area, assisting in tackling climate change and protecting and enhancing the many environmental assets of the area.

This will be achieved through the strategy focussing the great majority of growth in and around the Norwich urban area and the towns and larger villages, together with some growth in smaller villages to support local services.

The strategy includes a strategic growth area promoting Greater Norwich's economic strengths and sectors and linking to other regional and national growth corridors centred on Cambridge.

This approach will both assist the ability to access external funding and emphasise the role that Norwich, in particular the city centre as a regional centre for jobs, retailing, leisure, entertainment and cultural activities, and the NRP for employment, play as a driver of the regional economy, generating travel and contributing to the economy. This strong focus on the strategic growth area will assist strong economic growth in the area. It will also provide for the co-location of jobs and homes, providing strong links to services, education opportunities and other facilities, at the same time promoting active and sustainable travel.

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## Purpose

1. This topic paper is part of a series prepared for the consideration of the Greater Norwich Local Plan (GNLP) at its examination. On adoption, the GNLP will provide the planning strategy for Broadland, Norwich and South Norfolk from 2018 to 2038.
2. The topic paper provides further justification and explanation of the overall growth strategy set out in GNLP policy 1, along with links to background evidence. It is primarily produced for the Inspectors, although it will also be of benefit for all of those involved in the examination of the plan.
3. The paper:
  - includes background and context from previous and current strategic approaches to planning for the area;
  - outlines local evidence of housing and jobs needs;
  - explains how the strategy complies with the requirements of the National Planning Policy Framework (NPPF) and
  - summarises information from the various stages of public consultation and sustainability appraisal, identifying how the strategic approach in the submitted GNLP has evolved through the plan-making process.

## Background

### Long-term growth trends

4. Census data shows that the population of Greater Norwich rose from 351,000 in 2001 to 381,000 in 2011. The [Office for National Statistics](#) estimated the population of the three Greater Norwich districts in 2018 at 409,000.

### Long-term strategic planning

5. Long-term strategic planning in Greater Norwich over recent decades has primarily been guided by the Norfolk Structure Plan (adopted 1999) and the Joint Core Strategy (JCS), which was adopted in March 2011 with amendments adopted in January 2014. Regional plans also provided strategic policy in the first decade of the century.
6. These plans set the strategies for development which the GNLP continues, adapts and develops further. Appendix 1 of this topic paper summarises these strategies to provide context for the GNLP's proposed strategic approach. The main legacies of the previous strategies are that:

- a. They focussed the great majority of growth in the area in and around Norwich to promote sustainable development, brownfield site redevelopment and the regional role of the city. This was done primarily through the policy mechanism of the Norwich Policy Area (NPA), which included the Norwich urban area, and the first ring of larger village as well as Wymondham and Long Stratton. Remaining areas in Broadland and South Norfolk were defined as Rural Policy Areas (RPAs). Settlement hierarchies also assisted in focussing growth in locations with the most services. Appendix 1 includes links to the JCS Key Diagram and to maps and text defining the Norwich urban area and the NPA. These strategic policies were then reflected in more detailed local plans.
- b. The JCS established a main north-east to south-west axis for growth extending from the sustainable urban extension at the Growth Triangle to the north-east of Norwich, through the City of Norwich to the A11 Corridor to the west and south-west of the city.

## Evidence

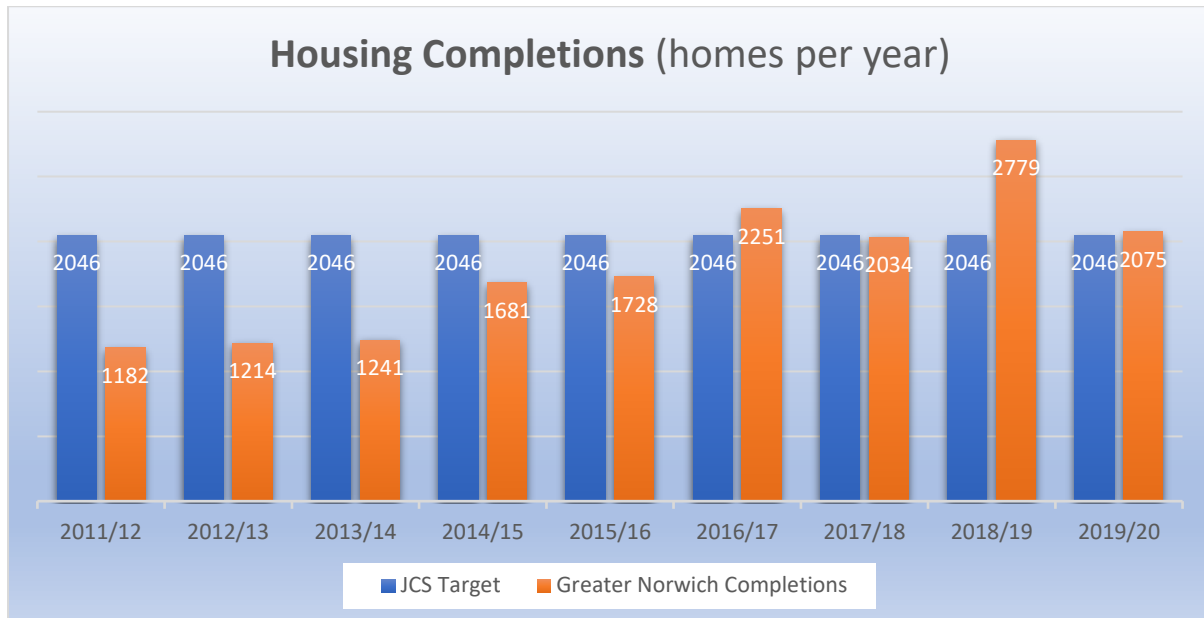
### Housing

7. Delivery in the 1990s and the first decade of this century, at around 1,200 homes per year, fell short of the 1,500 homes per year anticipated in the Norfolk Structure Plan and the 2,000 anticipated in the East of England Plan. Delivery was relatively strong in the city centre and in more rural areas, but some urban extensions were not delivered to the timescales which had been anticipated.
8. Between adoption of the majority of the JCS in 2011 and 2020, 90% of the housing target of 2,046 homes per year was delivered. Housing completions were well below target in the early years of the JCS plan period. This largely resulted from the increased targets through the JCS, the global financial crisis and delays to the plan making process as a result of a legal challenge to the JCS which required amendments to be adopted to the plan in relation to the Broadland NPA in 2014.
9. There was generally a steady annual increase in completions from 2014/15 onwards, and delivery was around and above the JCS annual target in the most recent years (see figure 1 below). Figure 1 does not include delivery from student accommodation and housing for the elderly. Changes to government policy from 2018/19 onward has allowed these to be included at a discounted

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rate. Delivery figures including these sources of supply for 2018/2019 are 2,936 and for 2019/20 are 2,304.

**Figure 1 Housing completions 2011/12 to 2019/20**



10. Increased delivery is likely to reflect the progress made on, and subsequent adoption of, the site allocation plans in the three districts (Norwich's was adopted in 2014, South Norfolk's in 2015 and Broadland's in 2016) and the Area Action Plan for Wymondham (adopted in 2016). As these plans identified allocations, they provided greater certainty for housing delivery. One of the key differences between the JCS and GNLP is that the sites are being identified in parallel with the strategy this time, which is likely to encourage more rapid delivery.

## Locations of JCS housing delivery

11. Figure 2 below uses data from the Greater Norwich [Annual Monitoring Report](#) 2019/20 to show delivery in the NPA and RPAs in comparison with JCS targets from 2015/16 to 2019/20:

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**Figure 2 Housing delivery within Greater Norwich 2015/16 – 2019/20**

Area	JCS annual target	Mean annual delivery 15/16 to 19/20
Greater Norwich	2,046	2,173
NPA	1,825	1,733
Broadland NPA	617	444
Broadland RPA	89	201
Norwich	477	494
South Norfolk NPA	731	795
South Norfolk RPA	132	240

12. Figure 2 shows that:

- Overall housing delivery was above target for this time period;
- NPA delivery was slightly below target, with the Broadland part of the NPA being more significantly below target, and both Norwich and the South Norfolk part of the NPA above target. More detailed annual delivery data shows that delivery in the Broadland NPA increased in the final two years of this period subsequent to the completion of the Northern Distributor Road (NDR) providing better access to the area. A large number of sites in that area now have permission and/or have or are about to start on site (see appendix 5 of this topic paper on strategic site delivery). Appendix 5 also shows that planning applications are under consideration for the sites allocated through the Long Stratton AAP and that funding is in place for the A140 by-pass.
- RPA delivery in the towns and villages outside the NPA has been more than double the target in this time period.

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## Employment

13. The Annual Count of Employee Jobs (source: Nomis, set out in the AMR) shows a rise in jobs across Greater Norwich from 171,700 in 2011/12 to 193,000 in 2018/19.
14. This jobs increase has been delivered in a number of locations, including the expansion of Norwich Research Park (NRP), Broadland Business Park and Wymondham employment areas. There has been a decrease overall in office space and job numbers in the city centre reflecting national trends and changed legislation making office to residential conversions permitted development.
15. The topic paper on the Economy supporting policy 6 provides more detail.

## The distribution of the population

16. The number and proportion of the homes in the different parts of the proposed GNLP settlement hierarchy in 2018 was as set out in figure 3 below and the populations of the main settlements in the 2011 Census are shown in figure 4.

**Figure 3 Housing distribution 2018 (figures rounded - Source: Council tax records)**

Area	Homes 2018	% of homes
Norwich urban area	106,100	56.6
The Main Towns	19,400	10.3
The Key Service Centres	15,900	8.5
Village clusters	46,100	24.5
Total	187,500	

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**Figure 4 - Population of the largest settlements in Greater Norwich**

Settlement	Population 2011 census
Norwich urban area	213,166
Wymondham	14,405
Diss	7,572
Aylsham	6,016
Hethersett	5,691
Poringland (including Framingham Earl)	4,826
Harleston	4,641
Long Stratton	4,425
Horsford	4,163
Brundall	4,019
Blofield	3,316
Mulbarton	3,251
Acle	2,824



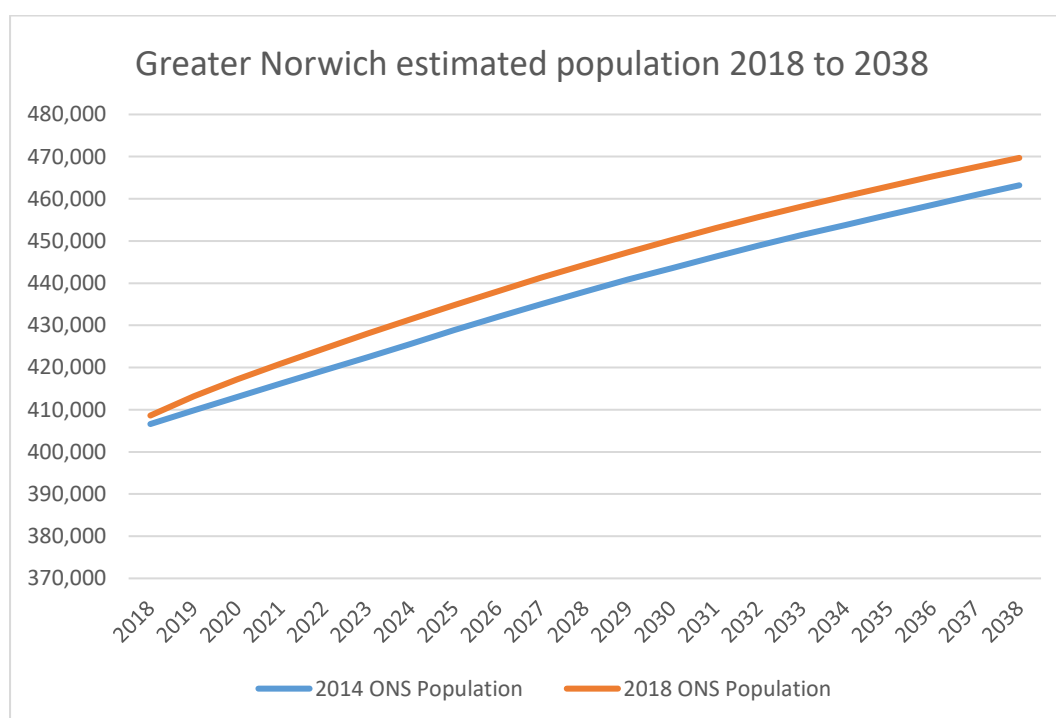
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Reepham	2,709
Hingham	2,367
Loddon and Chedgrave	2,284
Wroxham	1,502

## Future Projections

17. Estimates shown in figure 5 below are from the Office for National Statistics (ONS) [2014](#) and [2018](#)-based population projections. These suggest that the long-term trend for population increase will continue in the years up to 2038, with the population rising to between 463,000 and 470,000 by 2038.

**Figure 5 Population projections 2018 to 2038**



## National policy and the GNLP

18. The NPPF has been revised three times during the plan-making process for the GNLP, in 2018, 2019 and 2021. In general, these amendments have not had a major impact on the development of the overall strategy as the NPPF has remained substantively unchanged in terms of the requirements for strategic plan-making relevant to policy 1 of the GNLP.
19. The [2021 NPPF](#) requirement for plans which contain new settlements and/or substantial extensions to plan ahead for 30 years, rather than 15 years, does not apply to the GNLP which had reached the Regulation 19 publication stage when the NPPF was revised (see NPPF paragraph 22, footnote 16 and annex 1, paragraph 221).
20. NPPF paragraph 60 highlights that the government's objective is to significantly boost the supply of homes. Paragraph 82 states that planning policies should positively and proactively encourage sustainable economic growth.
21. In relation to local plans, NPPF paragraph 23 states that *“Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area”*.
22. The GNLP meets the above NPPF requirements by providing the planning strategy for the pattern and scale of sustainable development to meet growth needs in Greater Norwich from 2018 to 2038, along with the great majority of the proposed newly allocated sites to implement that strategy (sites for 1,200 homes are to be allocated through the South Norfolk Village Clusters Housing Sites Allocation Plan). GNLP policy 1 (see appendix 6 of this topic paper or [here](#)) sets out the broad strategic approach which is illustrated on the [key diagram](#). Policy 1 also provides the context for more detailed strategic locational, thematic and sites policies in the plan.
23. The strategy aims to make the most of Greater Norwich's substantial economic growth potential to develop its leading role in the national economy and to meet local housing need (LHN), whilst also protecting and enhancing the special environment of our area and promoting low carbon development.

24. The GNLP also provides a “direction of travel” for the longer term by identifying opportunities for growth which could be taken forward to meet additional needs in the next local plan. A significant part of this long-term need is likely to be met in a future plan through the development of new settlements (see proposed [policy 7.6](#)).
25. Policy 1 establishes that the five-year housing land supply will be calculated across the whole of the three districts.

## Sustainability Appraisal and Habitat Regulations Assessment

26. The sustainability appraisal (SA) process has been integrated into the production of the GNLP throughout, so has informed the plan-making process which has led to the submitted strategy. The submitted SA has repeated the conclusion drawn by the SA of the Regulation 18A stage on what later became policy 1 for:
- a. the **scale of housing growth**, that a housing requirement equal to Objectively Assessed Need (OAN) with a delivery buffer of approximately 20% with windfall forming part of the buffer was the most favourable approach and
  - b. the **distribution of growth**, that none of the six reasonable alternatives assessed (see paragraphs 61 and 62 below) clearly performed better than others in sustainability terms.
27. The SA has also highlighted the need to balance social, environmental and economic priorities through a strategy which aims to meet housing needs in vibrant communities, provide for sustainable economic growth and minimise greenhouse gas emissions.
28. As well as measures to promote low carbon growth throughout the plan, the GNLP strategy in policy 1 addresses climate change issues by focussing the great majority of growth in the Norwich urban area and in and around our towns and larger villages, thus reducing the need to travel and making active travel and public transport more attractive and viable options, and therefore addressing climate change impacts. At the same time, and in the context of changing social behaviour such as home-working and home-shopping, the strategy allows for some limited growth in and around smaller villages to support rural life and services, social sustainability and vibrant communities.

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Overall, the strategy promotes more concentration of the population than its current distribution, with a consequent positive impact on addressing climate change.

29. As part of this, the strategy also promotes a greater concentration of the population in the Norwich urban area (NUA) than the current distribution. The total provision in the plan for the NUA is 32,691 homes, including carried forward allocations, uplift on allocated sites and other deliverable commitment. This equates to 66% of the proposed housing growth across Greater Norwich. In 2018, around 57% of existing homes in Greater Norwich were in the NUA according to council tax records.
30. Further to the above, an addendum to the Regulation 19 SA ([A6.5](#)) was produced in September 2021 to provide a clear narrative showing how the plan's preferred strategy and reasonable alternatives to it were shaped over time. It concludes that *"The preferred option combines concentration of most of the development in and around Norwich and on the Cambridge Norwich Tech Corridor, with an element of dispersal to villages to support rural communities. It is considered that the preferred approach provides the best balance across a range of sustainability objectives and will help to support delivery of the plan"*.
31. An "appropriate assessment" under the Habitat Regulations or Habitat Regulations Assessment (HRA) has been produced for the GNLP. The overall aim was to determine whether the plan would have a likely significant effect upon the integrity of any "European" status wildlife site. Like the SA, the HRA was produced as an iterative process at various stages of the GNLP process to inform the plan.
32. Further detail on the Sustainability Appraisal and Habitats Regulation Assessment of policy 1 of the GNLP is in appendix 2.
33. The next sections of this topic paper cover the stages of plan-making that led to the submitted plan, with a focus on the consultation on and development of the strategy in policy 1.

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## Stages of GNLP Plan Making

34. The first stage of making the GNLP, the Regulation 18 stage, is one of evidence gathering and consultation. This included the collation of information and various studies being commissioned. These are contained in the GNLP's [evidence base](#). An initial “call for sites” that might be suitable for development took place in summer 2016, and sites continued to be submitted throughout the Regulation 18 consultation stage.
35. The relevant bodies were consulted on the sustainability appraisal scoping report in summer 2016 (see appendix 2) and an interim Habitats Regulation Assessment was produced in late 2017 ([B9](#)) to support the subsequent Regulation 18A consultation.

## Regulation 18 Consultation

36. The Regulation 18 consultation consisted of three stages, stages A to C, which took place between 2018 and 2020.
37. Stage A, consulted on between January and March 2018, was the Growth Options and Site Proposals consultation. This covered issues and options for the strategy and consulted on the submitted sites. At that time the plan period was anticipated to end in 2036.
38. Stage B is not discussed in this topic paper as its focus was on new, revised and small sites, some of which were subsequently incorporated into the stage C consultation.
39. Stage C was the draft plan consultation, held from January to March 2020. This included the preferred option and reasonable alternatives for the strategy which was by then anticipated to cover 2018 to 2038 to ensure a 15-year time horizon on adoption. It also included consultation on the preferred option and reasonable alternatives for the sites to be allocated to implement the proposed strategy.

## Stage A consultation January to March 2018

40. This issues and options consultation included questions on the amount of growth to be proposed through the plan and options for its distribution, including

the settlement hierarchy. It also covered the potential for new settlements and for establishing a Green Belt in Greater Norwich.

41. A high-level report summarising the responses as highlighted below was taken to GNDP Board on [19<sup>th</sup> June 2018](#) (see pages 20 to 49). A more detailed record of responses was then reported to the GNDP on [26 September 2018](#). Appendix 1 of the latter report with the detailed consultation responses is part of the Statement of Consultation which has been submitted with the GNLP and is available [here](#).

## The broad strategic approach

42. The [Growth Options](#) document asked in Question 2 *Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1 to 4.7?* The approach included 45,000 additional jobs by 2036, including in high productivity sectors. It also included 42,865 new homes, of which 7,200 would be on new sites due to the scale of homes already permitted and allocated in existing plans. The homes on new sites were to be focussed in and around the main urban area and in towns and villages with a range of services.
43. The consultation document stated *To make this happen the GNLP will include policies that:*
- *Support the economy through infrastructure investment, environmental enhancement and quality of life improvements;*
  - *Enable development of the strategic employment locations in the city centre, the Norwich Airport area, Broadland Business Park/Broadland Gate, NRP, Wymondham/Hethel, Longwater and the Food Enterprise Zone;*
  - *Promote the Cambridge Norwich Tech Corridor growth initiative;*
  - *Promote inclusive growth and social sustainability;*
  - *Provide for local employment close to where people live;*
  - *Support a thriving rural economy.*
44. 96 respondents were in favour of the proposed broad strategic approach, while 56 respondents did not agree with the proposed approach. Development industry respondents were generally supportive or sought more overall development to meet the City Deal's growth target (see Appendix 3 of this topic paper for more information on the City Deal and housing numbers), or more development in rural communities. Residents and community organisations

tended to be more negative about the strategic approach, pointing to the challenges and possible adverse consequences of growth for infrastructure, services, community cohesion and the environment.

## The amount of housing growth

45. The Growth Options document also consulted on different options for the amount of housing growth, setting out the main reasons for additional housing need as follows:

- *People are living longer with a tendency to smaller households. This increases the need for more houses irrespective of any growth in the population;*
- *More people are moving into the area, mainly from other parts of this country, both because of economic growth and for lifestyle choices;*
- *More people are in need of housing as not enough homes have been built in recent years leading to a significant housing shortage. This lack of housing delivery has led to the parts of the area having no “5-year land supply”, which has resulted in planning permissions being granted for housing in locations not promoted in current local plans; (Please note that this text reflected the lack of a 5-year housing land supply before the consultation. This no longer applies – see appendix 4 of this topic paper).*
- *The housing shortage in Greater Norwich has a significant impact on the quality of people’s lives, particularly for younger people looking to set up home for the first time. It is important to note that Government policy aims to significantly boost the supply of houses for all in society.*

46. The consultation document then explained how the housing numbers proposed at this stage of plan-making had been arrived at using the then emerging national standard methodology for calculating housing need. This led to a figure of around 2,050 homes per annum, which was 39,000 homes for the plan period.

47. Three questions were asked in the housing need section:

Question 4 *Do you agree that the OAN for 2017-2036 is around 39,000 homes?*

Question 5 *Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?*

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Question 6 *Do you agree that windfall development should be in addition to the 7,200 homes?*

48. Responses to question 4 were relatively evenly balanced, with 69 respondents agreeing with the consultation's basic housing need figure and 83 disagreeing.
49. Those supporting the figure argued that increased housebuilding is a government priority, the population is growing, homes are unaffordable for many and significantly more homes are needed to meet social responsibilities and to support economic growth. Considerable support for using the government's emerging standard methodology for calculating the housing numbers was expressed. In particular, the Home Builders Federation supported its use, together with the use of a 10% buffer and not including windfall in the calculation of requirement. However, much of the support was tempered by additional comments e.g. housing allocations should be located in deliverable locations and the existing JCS strategy overly relies on large sites near the urban area, which should not be repeated.
50. 'No' responses included a majority who believed that the figure was too high. A common theme was that the estimate was wrong or not credible, many reflecting the CPRE's comments that the emerging standard methodology was flawed, and existing allocations are sufficient for the next 24 years based on past delivery rates, so any additional allocations should be phased or kept in reserve and only brought forward if needed.
51. Others suggested that the emerging standard methodology should not have an extra affordability element. It was also argued that CIL increases house prices, thus reducing affordability, which then creates the need for more houses to be built. Others suggested that better use should be made of the existing housing stock and empty homes should be brought back into use.
52. Other general comments were that house building would attract people from outside the area, population growth should be reduced and the wrong type of homes could be built, with the primary need for more homes being for the young, the elderly and social housing rather than larger houses.
53. It was also argued that new homes need to be in existing centres to protect the countryside and agriculture. A view that communities will become unbalanced was expressed, along with arguments that additional homes will be bought by investors and developer land-banking and excessive developers' profits will result. Other arguments against new housing were that infrastructure will not be



able to cope, there will not be enough jobs and Brexit would reduce the need for additional housing.

54. The alternative element of the 'No' responses was from those who argued that the need figure was too low. Many of these responses were from agents. Suggestions were that local evidence from the Strategic Housing Market Assessment (SHMA) rather than the government's draft standard methodology should be used at that stage, and that the objectively assessed need (OAN) figure should not be rebased to 2017. It was also argued that the City Deal figures should be added in, giving a higher need. There was a reminder that the OAN is a minimum and it was suggested that the figure should be higher in order for the plan to achieve a 5 Year Housing Land Supply (5 YLS), with a specific point that there should be a mix of site sizes. Many of the comments related to the promotion of particular sites.
55. A total of 153 separate responses were received to Question 5 on having a 10% delivery buffer and allocating sites for 7,200 additional homes. Of these 49 replied Yes, 99 replied No and the remainder did not specify an option, providing additional comments.
56. Those responding 'Yes' generally stated that some developments, most particularly larger ones, might not happen or may be delayed, so there needed to be an allowance for this through a delivery buffer. Other points raised included that the OAN was an underestimate, demand for housing would increase so a buffer will be needed, and that more homes are needed for young people.
57. A number of comments stated there should be a review of existing allocations and any buffer should be part of a phased approach which should only be used if necessary.
58. A large number of the 'No' comments were aimed at keeping the housing requirement down. A number of arguments were provided for this, including: land should be protected; a buffer is not needed; the original target figure is too high; the economy will decline because of Brexit; the OAN is inaccurate and the market will not meet this figure. There was a view presented that any buffer should be phased and only be brought forward if absolutely needed. Advantages expressed for this approach were that it would avoid 'cherry-picking' of sites by developers and encourage brownfield sites and existing sites to be developed first.

59. A number of agents argued that the buffer should be higher, with the Chelmsford Local Plan being given as an example of a 20% buffer being used. Arguments cited were that there was “persistent” under-delivery in the area; the need to accord with national policy; large sites take a long time to deliver; a City Deal element should be included and the interim SA refers to a buffer of at least 20%. Also, some comments reflected those of NHS England i.e. that a high buffer increases uncertainty for infrastructure providers. In particular, Highways England were concerned that a 10% buffer plus windfall would give a high level of uncertainty and make infrastructure planning difficult, with a potential impact on the strategic road network.
60. Significantly more respondents (110) said ‘No’ than those who said ‘Yes’ (45) to question 6 on whether windfall development should be in addition to allocations for 7,200 homes.
61. The majority of ‘Yes’ comments were from agents, arguing that windfall should not be within the housing requirement and should be additional to any buffer. It was argued that this was because windfalls do not provide enough certainty on delivery and timing to be included in the housing figure and so no significant amount of windfall should be relied on. It was also maintained that there is a lack of evidence to support a specific windfall figure and that windfall is likely to reduce in the future, as in the past much windfall has resulted from 5YLS appeals. Also, it was argued that windfall generally occurs on smaller sites that do not provide affordable housing or other infrastructure benefits.
62. Other ‘Yes’ comments included arguments that windfall could provide an appropriate buffer, that it is useful in providing small-scale development in villages to address needs for young families and the elderly, and that windfall should be encouraged through positive policies. Conversely, it was also suggested that a high windfall figure could impact on services and infrastructure, and that planning for infrastructure was harder for windfall than for allocated sites.
63. The ‘No’ comments broadly split between many who thought that it was illogical not to include windfall in the housing calculation as it contributes to needs; to those who thought the windfall should be the buffer and to those (generally agents) who thought it should be excluded entirely because of its uncertainty.
64. Other more detailed comments included: smaller developments (e.g. up to 30 units and self-build and low cost homes) should be encouraged in villages instead of large developments; past housing delivery targets were too high and this is being continued; current commitment is sufficient based on past delivery

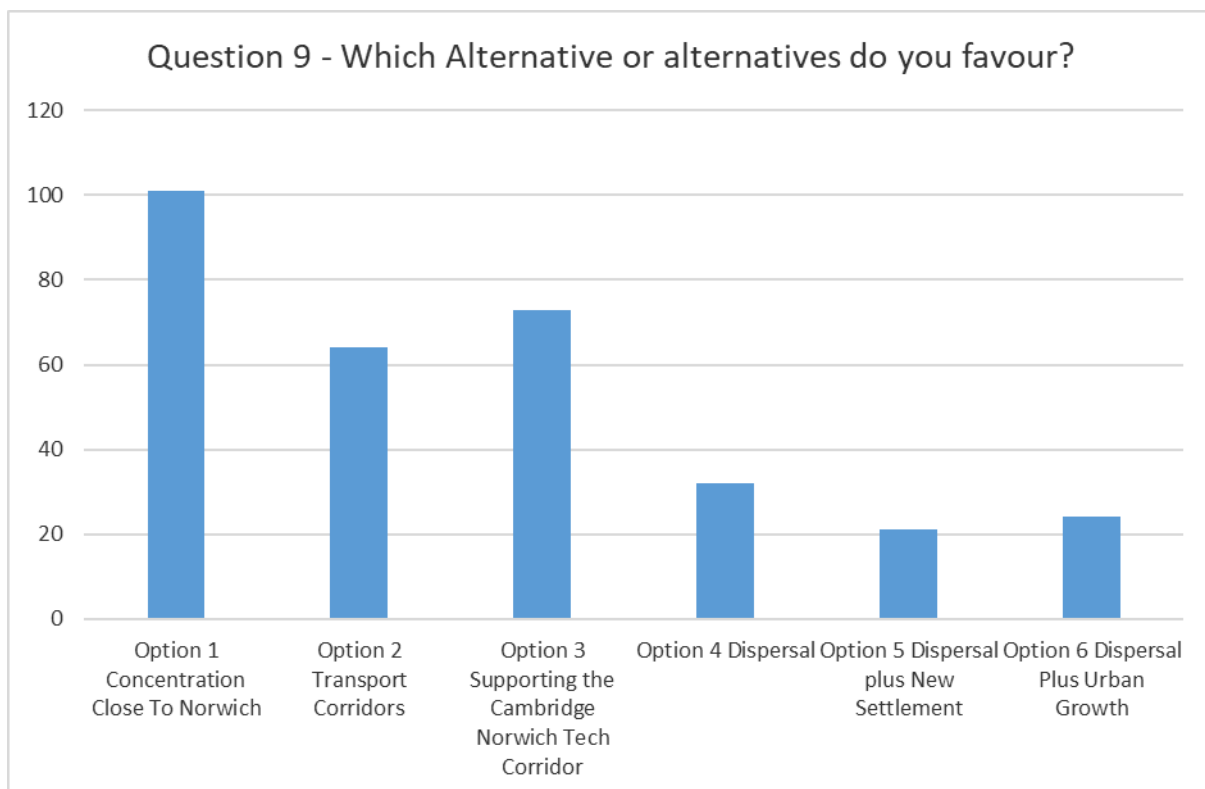
rates; inaccurate figures have been used; Neighbourhood Plans should be used for allocations and growth is not necessarily good. Some further comments related to the potential disbenefits of significant windfall: it could result in over-supply and impact on the housing market or lead to unsustainably located development. NHS England stated that windfall sites can have a significant cumulative impact on health and social care needs, and so such proposals should be communicated to health and care providers in a timely manner.

## The distribution of growth

65. The Growth Options document presented six different options for the overall strategy for the distribution of growth.
66. The first three options supported focussed development:
  - Option 1 Concentration close to Norwich;
  - Option 2 Transport corridors;
  - Option 3 The Norwich – Cambridge Tech corridor;
67. Options 4 to 6 allowed for more dispersed patterns of growth. These were:
  - Option 4 Dispersal;
  - Option 5 Dispersal plus new settlement;
  - Option 6 Dispersal plus urban growth.
68. The document made it clear that the chosen strategy may be an amalgam of the options.
69. All options included some growth in all parts of the settlement hierarchy in the baseline.
70. All of the options were identified as “reasonable alternatives” and were described in pages 25 to 31 of the [Growth Options](#) document. Analysis of the pros and cons of the different options was included. Appendix 1 of the growth options consultation document illustrated the options in further detail.
71. Three questions were asked about the growth options. These were
  - Question 9 - *Which alternative or alternatives do you favour?*
  - Question 10 - *Do you know of any infrastructure constraints associated with any of the growth options?*
  - Question 11 - *Are there any other strategic growth options that should be considered?*

72. Question 9 allowed respondents to favour one or more of the six proposed distribution options for growth, or none. Overall, there was greater support for the concentration of development around Norwich and in transport corridors than there was for more dispersed growth. Option 1 (concentration) was the most popular with 101 responses, followed by transport corridors and the Tech corridor (see figure 6 below).
73. The options related to dispersal had less support. Bodies including the CPRE, Norfolk Transport Action Group, Norwich Cycling Campaign and Norwich Business Improvement District all favoured concentration.

**Figure 6 Consultation responses on the distribution of growth**



74. Alternative strategic growth options proposed by respondents included intensification of urban Norwich and 'super-dispersal' over more villages.

## New Settlements

75. Question 12 concerned the long-term potential for a new settlement or settlements to meet growth needs. Some expressed the view that a new settlement would improve delivery of infrastructure and the quality of development. Among those stating opposition, there was concern that a new settlement could affect the ongoing sustainability of existing towns and key service centres.

## Green Belt

76. Question 13 asked “Do you support the establishment of a Green Belt? If you do, what are the relevant “exceptional circumstances”, which areas should be included and which areas should be identified for growth up to and beyond 2036?
77. Options were presented for the nature of the prospective Green Belt (a wide or narrow Green Belt, or a wedge-based approach). Pages 32 to 34 of the [Growth Options](#) document set out why it was not felt that there was the evidence to meet the exceptional circumstances required by the NPPF to justify the establishment of a Green Belt for Norwich, stating that growth needs in the future would need to be met and the retention of landscape and environment asset protection policies were the most suitable approach.
78. This is set within the context of existing planning strategies including the JCS and Development Management local plans which set out a number of landscape protection policy tools, including strategic gaps, gateways, undeveloped approaches and a protection zone along the route of the Norwich Southern Bypass. In addition, the development of the green infrastructure network has and will contribute to promoting biodiversity and public access to many important local landscape areas.
79. Those opposing a Green Belt argued that none of the government’s ‘exceptional circumstances’ for the establishment of a Green Belt could be evidenced in Greater Norwich. It was also argued that a Green Belt would lead to unsustainable patterns of growth by focussing development in locations with poor access to existing urban areas and employment and that current landscape protection policies provided adequate protection for valued landscapes.
80. There was considerable support for the establishment of a Green Belt, including from the CPRE and the Green Party, as well as a number of individuals. A petition in support with 1,912 signatures was submitted by the CPRE. There was also some opposition, particularly from the development

industry. Overall, 83 consultation respondents were in favour of a Green Belt and 38 were against.

81. Most of those in support favoured a wedge-based Green Belt, with protection of the river valleys, the development of green infrastructure links and retaining gaps between settlements being the priority. Many supporters stated that the scale of current and additional growth provided the 'exceptional circumstances' required by government for a new Green Belt to be established and that existing landscape protection policies were not sufficiently strong.

## The settlement hierarchy

82. The Growth Options document also discussed options for defining the settlement hierarchy, using the hierarchy from the JCS as a starting point. The document stated in question 23 that the top three tiers of the JCS hierarchy e.g. Norwich urban area, main towns and key service centres have well defined criteria which it was not proposed to change. It then went on to identify the possibility of combining tiers 4-6, that is service villages, other villages and smaller rural communities and the countryside into a single tier of 'village groups'.
83. The consultation document stated that village groups would be based on the premise that neighbouring villages share services. The implication of this was that villages with few services could be considered suitable for modest growth if services could be readily accessed in neighbouring settlements. This approach is supported by NPPF 2019 paragraph 78, which states "*Where there are groups of smaller settlements, development in one village may support services in a village nearby*".
84. The Growth Options document consulted on two reasonable alternatives. SH1 – to have a 6-tiered hierarchy which would be broadly a continuation of the approach in the JCS, with the amount of growth in each tier being based on the scale and range of services or SH2 – have a 4-tiered hierarchy including village groups as tier 4. The latter would be a new approach with all parishes below tier 3 being amalgamated into village groups. An appendix was provided which showed the existing classification of villages and their level of services and facilities to provide context for respondents.
85. As well as asking respondents for their views on options SH1 and SH2 (questions 24 and 25), the document looked at the criteria to be used to define groups, what specific villages could form groups and how growth could be allocated between villages within a group.

86. The following responses were received to the Growth Options consultation in relation to questions 24-25:

Question 24 – *Do you favour option SH1 and are the villages shown in Appendix 3 correctly placed?* 67 respondents favoured option SH1 and 17 did not. Answers to question 24 generally favoured keeping the lower settlement hierarchy tiers of service villages, other villages and smaller rural communities. Detailed comments were received about the placement of particular settlements within the hierarchy.

Question 25 – *Do you favour the Village Group approach in option SH2?* 22 responses were in favour of the village group approach and 53 were against. It was evident though that at least some responses were based on arguing for or against housing allocations in a particular place. Opposition to the village group approach focussed on the view that inclusion in a group might lead to individual villages having more housing, or the merger of villages with the loss of countryside, character, identity and distinctiveness. It was also argued that placing all settlements in village groups would open up rural Greater Norwich for significant development, increasing car dependency and undermining the purpose of a settlement hierarchy.

87. Those supporting village groups argued that villages already share services, with some commenting that this approach is favoured in the NPPF. It was also argued that there is merit in linking settlements at different scales of the hierarchy which share services e.g. Diss with its neighbouring villages.
88. Further detailed comments were received about the criteria which should be used to define groups, which specific villages could form groups and how growth could be allocated between villages within a group.

## Discussion post Regulation 18A+B Consultations

89. After completion of the Regulation 18B consultation which provided more sites for consideration for allocation, to progress strategic matters further ahead of the draft plan consultation, the "[Towards a Strategy](#)" document was considered by the GNDP Board on 29<sup>th</sup> January 2019. The proposed approach for the distribution of growth to be consulted on through the Regulation 18C draft strategy was endorsed through this report.
90. "Towards a Strategy" concluded, based on national policy requirements, SA, local evidence and consultation feedback, that the proposed strategy should combine three key elements of the Growth Options i.e. urban concentration,



some dispersed growth to sustainable locations in more rural parts of the area and supporting the Cambridge Norwich Tech corridor.

91. The overall conclusion drawn was that the proposed strategy would achieve multiple benefits as it would:
- make the best of brownfield opportunities;
  - focus significant growth on urban extensions around Norwich and in the main towns;
  - allow for appropriate growth in the key service centres based on local constraints.
92. With regard to **the settlement hierarchy**, the concept of village clusters was discussed at paragraph 4.19 of this document which stated that board members had been clear that they favoured an approach that places all of the settlement hierarchy areas of Greater Norwich below key service centres within a village cluster based on primary school catchments. This would use an existing approach to clustering around a significant and reasonably stable local service base. To reduce additional car journeys and encourage healthy and active lifestyles, it was considered advisable to limit new housing allocations to sites within the cluster with good access to a primary school and a 'safe route to school'. The scale of growth in any cluster would reflect school capacity or ability to grow, plus the availability of other accessible services. Taking account of the timescales for delivery and other uncertainties, such as pupil preference, it was considered reasonable to assume that a minimum scale of allocation (15 to 20 dwellings) could be accommodated in all clusters if appropriate sites were available. The identification of sites with the fewest constraints would also help to determine the amount of growth in specific clusters. An initial and high-level assessment of the sites put forward suggested that the clusters could provide up to 2,000 additional dwellings.
93. Further to this, the benefits of appropriate growth in accessible locations in villages identified in the report were that it would:
- support local services, social sustainability and vitality, thus supporting rural life and communities;
  - provide choice for the market (paragraph 69 of the NPPF requires plans and brownfield registers to accommodate at least 10% of their housing requirement on sites no larger than one hectare) and
  - promote delivery of a variety of housing types and tenures.
94. The above approach would also provide opportunities for people who have grown up in villages, or who currently live there but have changing



accommodation needs, to remain in them and to take advantage of increasing home working opportunities.

95. Prior to consultation on the Regulation 18 Stage C draft plan, the decision was taken to remove the village clusters sites in South Norfolk from the GNLP, while retaining an overall target within in the GNLP, to be delivered through a separate South Norfolk Village Clusters Housing Allocations Plan (see the topic paper on policy 7.4).
96. The GNLP strategy document therefore set the minimum number of new homes for village clusters in South Norfolk at 1,200 homes to ensure the overall number of homes to support the strategic aims set out above and to achieve the vision and objectives of the plan to support “*vibrant places to live with good access to services and facilities .....and meet the needs of all in mixed communities*” Consequently, the Regulation 18C Sites plan only contained Broadland village cluster sites, proposing up to additional 480 homes.

## Regulation 18C consultation January to March 2020

97. The Regulation 18C document was a draft plan, with proposed policy wording and allocations of land for development. As such, it was substantially different from the earlier more generalised discussion of options contained in the Regulation 18A document. It had regard to the Regulation 18A and 18B consultations, the broad evaluation of likely significant effects set out in the Interim SA Report ([B23.2](#)) and the Interim Habitat Regulations Assessment (HRA) ([B9.1](#)) (see appendix 2), together with other evidence. The Interim SA and HRA Reports and other evidence formed part of the consultation.

## Outline of the proposed strategy

98. Table 6 of the [draft strategy](#) contained the plan’s proposed overall housing figure from 2018 to 2038 (44,343 homes) which was made up as follows:

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Category	Number of Homes	Number	Explanation
<b>A</b>	<b>Local housing need (2018 to 2038)</b>	<b>40,541</b>	The minimum local housing need figure has been identified using the Government's standard methodology.
<b>B</b>	<b>Delivery 2018/2019</b>	<b>2,938</b>	The number of homes built 2018/2019 (including student accommodation and housing for the elderly)
<b>C</b>	<b>Existing commitment (at April 2019) to be delivered to 2038</b>	<b>33,565</b>	The existing commitment is the undelivered sites which are already allocated and/or permitted, with parts of or whole sites unlikely to be delivered by 2038 excluded.
<b>D</b>	<b>New allocations</b>	<b>7,840</b>	These are the homes to be provided on new sites currently proposed to be allocated through the GNLP (6,640) and the South Norfolk Village Clusters Housing Sites Allocation Plan (1,200).
<b>B + C + D</b>	<b>Total housing figure</b>	<b>44,343</b>	Delivery (B), commitments (C) and new allocations (D). This currently provides a <b>9% buffer</b> to cater for any non-delivery of sites to <b>ensure delivery of local housing need</b> . The publication version of the plan will aim to provide a minimum 10% buffer (a minimum of a further 250 homes) which is likely to be provided through a combination of additional sites proposed through this consultation and contingency sites identified in this draft plan.

99. The Regulation 18C draft plan stated in paragraph 166 that housing growth was distributed in line with the following **settlement hierarchy**:
- I. The **Norwich urban area** which consists of **Norwich** and the built-up parts of the **fringe parishes** of Colney, Costessey, Cringleford, Drayton, Easton, Hellesdon, Old Catton, Sprowston, Taverham, Thorpe St. Andrew, Trowse and the remainder of the Growth Triangle.
  - II. The **main towns** which are Aylsham, Diss (including part of Roydon), Long Stratton, Harleston and Wymondham.
  - III. The **key service centres** which are Acle, Blofield, Brundall, Hethersett, Hingham, Loddon/Chedgrave, Poringland/Framingham Earl, Reepham and Wroxham.

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## IV. **Village clusters** which cover the remainder of the Greater Norwich Local Plan area.

100. Table 7 of the document (figure 7 below) set out the amount and proportion of the housing growth to be located in different parts of the hierarchy through the plan:

**Figure 7 - Regulation 18C Housing growth 2018 to 2038 (figures rounded)**

Area	Homes 2018	Homes 2038 (and increase)	Increase %	% of total housing growth
Norwich urban area	106,100	136,660 (+30,560)	29	69
The Main Towns	19,400	25,742 (+ 6,342)	33	14
The Key Service Centres (KSCs)	15,900	19,317 (+ 3,417)	21	8
Village clusters	46,100	50,124 (+ 4,024)	9	9
<b>Total</b>	<b>187,500</b>	<b>231,843 (+ 44,343)</b>	<b>24</b>	<b>100</b>

101. Thus, the proportion of the planned housing growth in the Norwich urban area and the main towns through the plan was proposed to be 83%. This compares to the 65% of the population who lived in these areas in 2018. Overall then the proposed strategy promoted more concentration of the population with a consequent positive impact on addressing climate change.
102. Some growth in villages was also considered to be necessary to promote the retention of services which is beneficial in relation to climate change, as further service loss will lead to more need to travel for village residents.
103. The strategy did not include a Green Belt for the reasons highlighted at the Regulation 18A consultation stage and set out above. As sufficient sustainable brownfield and urban and rural extension sites were available to meet housing needs to 2038, it also did not propose a new settlement, but stated that longer-term development of a new settlement or settlements could be a suitable future option.
104. Reflecting the main axis of growth which had been established by the JCS, and the promotion of the “Cambridge Norwich Tech Corridor” in New Anglia LEP’s strategies, the draft plan defined a “strategic growth area” (see the Regulation 18C [Key Diagram](#)).

105. At the Regulation 18C stage, the strategic growth area provided for 78% of the proposed overall growth and included:

- The main Cambridge Norwich Tech Corridor area, including Norwich, the North East Growth Triangle, the remainder of the Norwich Fringe, Hethersett and Wymondham;
- All the strategic employment areas in the plan;
- The Norfolk and Norwich University Hospital (NNUH);
- All the further educational institutions in the area (the University of East Anglia (UEA), Norwich University of the Arts (NUA), Easton College and City College;
- All but one of the strategic scale housing growth locations (the exception is Long Stratton which is contained in a separate Area Action Plan that is not being replaced by the GNLP);
- High quality public transport, road and cycling infrastructure (both existing and planned) and
- The great majority of brownfield sites in the area.

106. Benefits of the strategic growth area were identified as promoting the strategic economic strengths and sectors of the area and linking to other regional and national growth corridors (London-Stansted-Cambridge and the Cambridge - Milton Keynes-Oxford Arc). The draft plan explained that this approach will both assist the ability to access external funding and emphasise the role that Norwich, in particular the city centre as a regional centre for jobs, retail, leisure, entertainment and cultural activities, and the NRP for employment, play as a driver of the regional economy, generating travel and contributing to the economy. This strong focus on the strategic growth area will assist strong economic growth in the area, providing for co-location of jobs and homes, with strong links to higher order services, facilities and education opportunities and supporting active and sustainable travel.

107. Paragraph 164 stated that overall, the proposed strategy was considered to ensure sustainable development, minimise carbon emissions, promote strong, resilient, inclusive and vibrant communities and meet other government requirements set out in the NPPF, including by:

- a. Maximising brownfield development and regeneration opportunities, which are mainly in Norwich. The brownfield/greenfield split for new homes in the proposed plan was 27%/73%; A note was included in the draft plan which referred to uncertainty at that time about the potentially key site at Carrow Works (East Norwich), with the figure for additional homes in Norwich in draft policy 1 including an allowance for 1,200 additional new homes at the site (2,000 homes overall) which could later be amended depending on circumstances;

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- b. Broadly following the settlement hierarchy set out in draft policy 1 in terms of scales of growth as this reflects access to services and jobs;
- c. Focussing most of the growth in locations with the best access to jobs, services and existing and planned infrastructure in and around the Norwich urban area and the Cambridge Norwich Tech Corridor;
- d. Focussing reasonable levels of growth in the main towns, key service centres and village clusters to support a vibrant rural economy;
- e. Allocating strategic scale housing sites (around 1,000 dwellings +) in accessible locations;
- f. Allocating a significant number of medium scale and smaller scale sites in the urban area, towns and villages, providing a balanced range of site types to allow for choice, assist delivery and allow smaller scale developers and builders into the market. Overall, 12% of the homes identified through the draft plan were proposed on sites of no larger than 1 hectare, meeting national requirements (in NPPF paragraph 69);
- g. Setting a minimum allocation size of 12-15 dwellings to ensure that a readily deliverable amount of affordable housing is provided on all allocated sites.

108. Two main questions were asked on these issues:

Question 13 - *Do you support the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?* There were 88 representations made by 64 respondents with 22 in support, 33 objecting and 33 making comments.

Question 14 - *Do you support, object or wish to comment on the approach for housing numbers and delivery?* There were 79 representations, with 16 in support, 38 objecting and 25 comments.

109. Figure 8 summarises the main consultation feedback on these issues:

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**Figure 8 The most significant issues raised in the Regulation 18C consultation**

Issue	Summary of main issues raised on the Growth Strategy
<b>Overall Housing Numbers</b>	<p><b>Too low</b></p> <p>A strong view was expressed, with some (mainly from the development industry) stating that the housing numbers in the GNLP should be raised to take account of the Greater Norwich City Deal, provide a larger buffer and to correct errors in interpretation of the standard methodology.</p> <p><b>Too high</b></p> <p>An equally strong view, mainly from the CPRE, some parish councils and individuals, stated that the GNLP should:</p> <ul style="list-style-type: none"> <li>• use the more up to date ONS 2016 household projections rather than the 2014 projections required by the government's standard methodology;</li> <li>• use more accurate, lower projections;</li> <li>• reduce the buffer and include windfalls;</li> <li>• include phasing so that homes allocated in existing plans will be developed first.</li> </ul>
<b>Location of Growth + Hierarchy Issues</b>	<p>Varied arguments were presented on the location of development and hierarchy issues with the most common being:</p> <ul style="list-style-type: none"> <li>• The proposed strategy may not deliver the need, especially in the north-east growth triangle, so more growth should be placed elsewhere;</li> <li>• More focus is required on towns and KSCs, especially in Wymondham and the wider growth corridor and in Poringland, Brundall and Blofield;</li> <li>• Horsford should be a KSC rather than in a village cluster;</li> <li>• Sites should be allocated in Great + Little Plumsted village cluster;</li> <li>• To achieve a modal shift, new development allocations should be at locations close to, and transport integrated with, railway stations;</li> <li>• New Settlements should be included with less focus on urban extensions and/or growth in some towns (particularly Diss and Harleston);</li> <li>• There should be lower growth in villages as the current focus will generate travel and not support local services;</li> <li>• A Green Belt is required to focus growth;</li> <li>• Greater clarity is required on the services available at different levels of the hierarchy;</li> </ul>

- Delivery trajectories, particularly of brownfield regeneration sites, were unevidenced at the time of the consultation, making it difficult to comment on likely delivery of the strategy;
- A number of allocations are predicated on third party infrastructure investment which is not certain, risking undermining the delivery of the GNLP.

## The Regulation 19 Pre-Submission Plan (February to March 2021)

110. Between the Regulation 18C and the Regulation 19 draft plans the key change to the growth strategy, and indeed to the plan as whole, was that overall housing provision was increased by just over 5,000 homes with consequent changes to site allocations and the use of other sources of housing supply.
111. The government's aim to substantially increase the supply of homes, as set out in the NPPF, was further emphasised in the "[Planning for the Future](#)" white paper published in August 2020. Publication of the white paper was accompanied by [consultation](#) on amendments to the standard methodology, which, if implemented, would have increased annual housing requirement in Greater Norwich to over 3,000 homes a year, or by over 60% compared to the use of the 2014-based household projections for calculating the standard methodology. Subsequent to that consultation, the government retained the use of the 2014-based household projections for calculating the standard methodology for most locations, although requirements were increased for London and the other 19 largest urban areas, which do not include Norwich.
112. While local housing need continued to be derived from the 2014-based projections as required by the government's standard methodology, the higher provision in Regulation 19 reflects the government's aim to substantially increase the supply of homes which are a key element of the NPPF, as highlighted above, and provides the scope for additional delivery to support economic growth. It recognises that the 2018-based ONS projections for Greater Norwich indicate the possibility that household growth may be higher (see appendix 3 of this topic paper for more details).
113. Figure 9 below (table 6 in the [Regulation 19 strategy](#)) sets out how the resulting total housing provision of 49,492 homes from 2018 to 2038 for the GNLP has been established and will be provided for.
114. This includes the plan increasing allocations on sites to allow for an additional 2,840 homes. It also includes:
- a. making use of a proportion (around 30%) of projected windfall delivery as a windfall allowance (1,360 homes) and
  - b. an estimated number of homes to be provided on small sites through policy 7.5 which makes provision for windfall development outside



Settlement Limits across the GNLP area (800 homes - see figures 9 and 11 below and the separate topic paper on policy 7.5).

115. Due to the above changes, the plan includes a significant **buffer of 22%**.

However, it is important to note that:

- The housing provision figure for the plan provides for a delivery buffer to address fallout plus additional flexibility to allow for higher levels of growth. It is a “**potential**” figure as illustrated in the housing trajectory in appendix 4 of this topic paper. If the market for these additional homes does not materialise, they will not be provided. If so, it is more likely that the “**moderated**” provision figure in the housing trajectory in appendix 4 of this topic paper, which is the same as the NPPF “deliverable” definition, will be delivered.
- The broad strategic distribution of housing growth in the GNLP is little altered by the changes made between Regulation 18C and Regulation 19. The additional provision utilises sites that had already been identified and consulted on as ‘reasonable alternatives’ and is in line with the settlement hierarchy and the broad distribution of growth previously consulted on. The distribution in figure 10 below provides for 2,250 additional homes in Norwich and the fringe, 450 homes in the main towns and 140 homes in the key service centres. Although it is not possible to definitively say where the windfall allowance figure of 1,360 will be provided, this is likely to be on a broad range of sites across Greater Norwich, particularly on sites for small scale growth in villages and on small brownfield sites. While policy 7.5 covers all parishes, the majority of its expected 800 homes will be provided in villages across the area as they make up the majority of parishes.
- An addendum to the SA has been produced to provide a clear narrative showing how the plan’s preferred strategy and reasonable alternatives to it were shaped over time ([A6.5](#)).

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**Figure 9 Establishing the Plan's total housing figure**

Category	Type of Housing	Number	Explanation
<b>A</b>	<b>Local housing need (2018 to 2038)</b>	<b>40,541</b>	The minimum local housing need figure has been identified using the Government's standard methodology using 2014-based projections as required by transitional arrangements for plan-making. Appendix 3 of this topic paper sets out how this figure has been calculated.
<b>B</b>	<b>Delivery 2018/2019 and 2019/20</b>	<b>5,240</b>	The number of homes built in 2018/2019 and 2019/20 (including student accommodation and housing for the elderly).
<b>C</b>	<b>Existing commitment (at April 2020) to be delivered to 2038 (including uplift on allocated sites)</b>	<b>31,398</b>	The existing commitment is the undelivered sites which are already allocated and/or permitted, with parts of or whole sites unlikely to be delivered by 2038 excluded. Uplifts on existing allocations made through this plan are included here.
<b>D</b>	<b>New allocations</b>	<b>10,694</b>	These are the homes to be provided on new sites allocated through the GNLP (9,107), the South Norfolk Village Clusters Housing Sites Allocation Plan (1,200) and the Diss and area Neighbourhood Plan (200).
<b>E</b>	<b>Homes delivered through policy 7.5</b>	<b>800</b>	Policy 7.5 provides for delivery of 3 to 5 homes on small scale sites adjacent to settlement boundaries or on infill sites within recognisable group of dwellings.
<b>F</b>	<b>Windfall allowance</b>	<b>1,360</b>	There is a limited reliance on windfall sites. Evidence provides an estimated around 4,450 homes resulting from windfall development during the remainder of the plan period. As windfall is likely to remain robustly high this allows part of this evidenced windfall

			delivery to be used to demonstrate delivery of some of the total housing figure.
<b>B + C + D + E + F</b>	<b>Total housing figure</b>	<b>49,492</b>	Delivery (B), commitments (C), new allocations (D), homes delivered through policy 7.5 (E) and the windfall allowance (F). This provides a <b>22% buffer</b> to cater for the potential for higher growth rates. It also mitigates any risk of non-delivery of sites <b>to ensure delivery of local housing need.</b>

116. The locations identified and sources of supply for the additional growth in comparison with the Regulation 18C draft version of the plan are:

**Figure 10 Additional sources of housing growth at Regulation 19**

Location/source	Homes
East Norwich	<b>2,000</b>
Sites in Colney (200), Cringleford (50), Harleston (150), Wymondham (50), Aylsham (250) and Acle (140).	<b>840</b>
Delivery from policy 7.5	<b>800</b>
Windfall allowance	<b>1,360</b>
<b>TOTAL</b>	<b>5,000</b>

117. A contingency site for 800 homes at Costessey has been retained in the GNLP but is not included in the overall housing numbers. The contingency of 1,000 homes in Wymondham in the Regulation 18C draft plan was not included in the Regulation 19 strategy due to consultation feedback, the intention to retain strategic gaps between settlements and the high existing commitment in the town. Along with the significant buffer, the contingency helps to ensure that housing needs will be met through the plan.

118. GNLP policy 1 confirms that there will be a **5-year supply of deliverable housing sites** with over a 10% buffer on adoption of the plan. This complies with the requirements of paragraph 74 of the NPPF 2021 and Planning Practice Guidance as the results of the Housing Delivery Test show that Greater Norwich has delivered 133% of the number of homes required between 2017/18 and 2019/20, so the requirement to show a 20% buffer for the land supply does not apply.
119. The 5-year supply is evidenced by:
- The councils' [5 Year housing Land Supply Assessment](#), setting out the position on **1<sup>st</sup> April 2020**, shows a **6.16**-year land supply;
  - The councils' **revised** position, based on evidence submitted and heard at recent appeals, shows a **6.08-year** land supply. This figure has reduced slightly because a limited number of sites are no longer included in the supply due to changing circumstances, or through corrections to forecasts on sites for communal or student accommodation. These changes to the land supply position have been taken into account within the evidence presented in this topic paper;
  - A five-year land supply which includes the expected contribution from additional housing allocations proposed through adoption of the GNLP has been calculated. Assuming adoption of the GNLP in autumn 2022, it demonstrates that there will be a land supply of **6.4 years on April 1<sup>st</sup> 2023**.
120. Appendix 4 of this topic paper includes calculations which evidence the above.

## Main issues from representations

121. Figure 11 below is adapted from [the report](#) considered by GNLP members on 24<sup>th</sup> June 2021 and subsequent similar reports considered by the constituent councils when considering GNLP submission. It provides an overview of representations made both on policy 1 and through different policies in the GNLP in relation to the growth strategy, as well as including responses from the GNLP team to the points raised.

**Figure 11 Main issues raised on the strategy through Regulation 19 representations**

Summary of main representations	Response
Overall housing growth – Summary	Overall housing growth - response
<p>Representations from different organisations and individuals state opposite views that the plan provides for:</p> <ul style="list-style-type: none"> <li>• Too little housing growth (it doesn't reflect economic aspirations (as agreed in the Greater Norwich City Deal) and there is questioning of the methodology re. housing numbers);</li> <li>• Too much growth (housing need + a 5% buffer is sufficient, insufficient account has been taken of climate change, with the South Oxfordshire plan referenced as a plan challenged on the scale of growth in relation to climate change).</li> </ul> <p>Also -</p> <ol style="list-style-type: none"> <li>a) Windfall – a greater or lesser focus should be placed on windfall in calculating housing numbers, and policy 7.5 is considered unworkable;</li> <li>b) Contingency – more contingency sites are required versus none are needed.</li> </ol>	<p>The level of housing need for Greater Norwich is identified using the government's standard methodology, as promoted by the NPPF. Sites do not always deliver as expected, so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided. Appendices 4 and 5 of this topic paper provide the housing trajectory and cover deliverability of sites in the GNLP in greater detail.</p> <p>The challenge to the South Oxfordshire plan concerning the scale of growth and its climate change impacts was unsuccessful. Meeting housing need was identified by the Inspector as a key consideration, as well as addressing climate change, as plans need to provide for economic, social and environmental sustainability.</p> <p>The approach to windfall, which allows for some of the likely delivery to be included as part of overall housing provision, is considered appropriate. As windfall delivery is likely to remain robustly high, it is appropriate to include a limited proportion as part of total potential delivery.</p> <p>One contingency site is included should this prove to be required due to low delivery of allocated housing sites.</p> <p>The overall approach, including to windfalls, contingency and having a significant buffer, builds in flexibility to support higher than trend economic growth, incorporating the Greater Norwich City Deal, if this occurs.</p>

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5-year land supply – summary	5-year land supply - response
Representations (from some in the development industry) question the proposed approach to the 5-year land supply which is based on the housing need identified through the standard methodology without including the buffer.	The figure of 49,492 is potential housing delivery during the plan period, not the housing need. The need is 40,541, calculated using the standard methodology, using 2020 data.
<p>1) Settlement hierarchy</p> <p>i) Suggested changes (all to include more growth in specific locations):</p> <p>(1) Wymondham should be a Large Main Town;</p> <p>(2) Mulbarton, Scole and Horsford should be Key Service Centres (KSCs);</p> <p>(3) A separate countryside category is needed.</p> <p>ii) The amount of growth in different parts of the hierarchy:</p> <p>(1) More vs. less in the urban area (sustainability + availability of sites from city centre decline vs. deliverability and market saturation issues), over reliance on Strategic Regeneration Areas with limited evidence (East Norwich and Northern City Centre) and the North East Growth Triangle.</p> <p>(2) More/less growth in towns (less in Aylsham, more in Wymondham and Diss, new sites needed in Long Stratton).</p> <p>(3) More/less growth in KSCs – different views with focus on more in Brundall, Hethersett, Loddon, Poringland, Reepham and Wroxham vs. less in</p>	<p>1) The <b>Settlement Hierarchy</b>, which is based on evidence of the services available in different settlements, is considered to be appropriate. Open countryside is in the village clusters level of the hierarchy</p> <p>The overall growth strategy, including housing and jobs numbers and locations, is considered to be well-evidenced and to meet the plan's objectives. This will be achieved by focussing the great majority of growth in the Norwich urban area and in and around our towns and larger villages thus reducing the need to travel and addressing climate change impacts. At the same time, the strategy allows for some growth in and around smaller villages to support local services. The strategy maximises the potential of brownfield land and accessible greenfield sites. The strategy also offers a range of types and locations of sites which will help to ensure that the broad range of housing needs of different parts of the community are met, enhancing delivery of the housing by providing opportunities for a range of house providers.</p> <p>2) Regulation 18 included consultation on the potential for a <b>Green Belt</b>. The strategic approach of protecting valued landscapes including strategic gaps provides the policy coverage required. Establishing a Green Belt for the future at this stage would reduce flexibility and place pressure for additional growth required in the future on those areas not included in any Green Belt.</p> <p>3) The GNLP does not allocate any of the proposed new settlements as there are currently considered to be enough sites to meet needs in and around existing settlements. However, the strategy takes account of the government's recent changes to the planning system made through the NPPF, with policy 7.6 setting out the long-term intention to bring forward a new settlement or settlements through the next strategy and sets out a timetable for that work.</p>

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<p>Reepham and a different site in Hingham; (4) More/less growth in village clusters.</p> <p>2) The lack of a Green Belt has been criticised;</p> <p>3) New Settlements – there has been questioning of the lack of inclusion of new settlements, whilst an alternative view stated is that policy 7.6 should not prejudge the next plan;</p> <p>4) The Cambridge Norwich Tech Corridor (CNTC) should be a greater focus for growth;</p> <p>5) Undeliverable sites with no promoter or developer should not be in the plan.</p>	<p>4) Forming part of the defined Strategic Growth Area, the CNTC is a major growth focus. Due to high levels of existing commitment set through the JCS and subsequent plans which allocated sites, locations such as Wymondham, Hethersett, Cringleford and Easton are already strategic locations for growth, so only limited additional housing numbers have been added in these locations in this plan.</p> <p>5) As evidenced through the housing trajectory in <a href="#">appendix 6</a> of the strategy, undeliverable sites have not been allocated in the plan.</p>
<b>The strategy and climate change – summary</b>	<b>The strategy and climate change - response</b>
Climate change issues include the amount, distribution and timing of growth.	<p>The strategy focusses the great majority of growth in the Norwich urban area and in and around our towns and larger villages, thus reducing the need to travel and helping to address climate change impacts. It also allows for some growth in and around smaller villages to support local services, the loss of which would generate the need for more journeys.</p> <p>The overall housing numbers in the plan are suitable to address the housing shortage in the area, allow for sustainable economic growth to contribute to post Covid-19 recovery and the move to a post-carbon economy.</p>

## The Submission of the Plan

122. None of the representations made through Regulation 19 in relation to policy 1 were considered to raise issues preventing submission of the plan. However, it is anticipated that many of the issues raised will be matters for discussion at the GNLP's examination.

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123. As stated above, the changes made to the NPPF in July 2021 included transitional arrangements in relation to the timescales to be covered by those local plans which had already reached Regulation 19 on publication of the 2021 NPPF. Thus, the revisions to the NPPF did not prevent submission of the GNLP, particularly as the NPPF has remained substantively unchanged in terms of the other requirements for strategic plan-making which are relevant to policy 1 of the plan.
124. As set out in in appendix C of the [Submission letter](#) accompanying the GNLP, additional modifications, which are shown in figure 12 below, are proposed to policy 1 and its supporting text.
125. The additional modifications are not considered to be needed to make the plan sound or legally compliant. Instead, they consist mainly of modifications to supporting text for policy 1 to provide clarification, updates and corrections of errors, mainly in response to representations made at the Regulation 19 stage and the updates to the NPPF in July 2021. The last box in figure 12 is an additional modification to policy 1. As a cross reference to other policies to provide clarity requested by Natural England, it is not considered to be a substantive change which would constitute a main modification to the plan.

**Figure 12 Table of Proposed Additional Modifications**

Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
Policy 1 Sustainable Growth Strategy  Para. 158	To provide greater clarity on the purpose of the GNLP strategy in response to recent amendments to the NPPF (particularly the revised presumption in favour of sustainable development), and in response to rep 23425 from CPRE Norfolk.	Amend paragraph 158 to read:  This document meets the NPPF's primary purpose for a local plan by providing the planning strategy for the pattern, scale <b>and nature</b> of <b>sustainable</b> development to meet growth needs in Greater Norwich from 2018 to 2038.
Policy 1 Sustainable Growth Strategy  Para. 161	To provide greater clarity on the purpose of the GNLP strategy in response to recent amendments to the NPPF (particularly the revised presumption in favour of	Move para. 161 above paras. 160 and 159 and amend to:



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	sustainable development), and in response to rep 23425 from CPRE Norfolk.	Achieving sustainable development is at the heart of the planning system. This means striving to meet social, economic and environmental needs to provide a good quality of life for existing and future generations. <b>As required by the NPPF, the strategy aligns growth and infrastructure needs with the main focus on the strategic growth area. It makes the best use brownfield sites in the city, provides sustainable urban extensions and supports vibrant towns and villages. It will also improve the environment, including mitigating climate change and adapting to its effects.</b> The aim is to retain and enhance the distinctive qualities of Greater Norwich and create environmentally sustainable, resilient and socially inclusive communities. <b>Therefore</b> , as required by the NPPF, policy 1 promotes sustainable development.
Policy 1 Sustainable Growth Strategy  Paragraph 166  Footnote 53	To update the plan as the reference to transitional arrangements is now out of date.	Amend footnote 53 to read:  Government consultations in autumn 2020 pointed to significant reforms to the planning system, including to the form and role of local plans, and strongly suggest that additional housing growth will be needed in the next review of the plan. <del>As set out in paragraph 4, this plan is being progressed under transitional arrangements provided by government as part of the reforms.</del>
Policy 1  Paragraph 180	To make a correction in response to rep. 23429 from CPRE Norfolk.	Correct the figure in the final sentence of paragraph 180 so that it now reads:  These <del>1,400</del> <b>1,450</b> homes are included in the allocations in Row D.
Policy 1	To provide greater clarity by including cross references to policies 2, 3 and 4 in policy 1.	Add cross references in the final sentence of policy 1 in relation to infrastructure provision, including green infrastructure, so that it reads:



	This is in response to rep. 24471 from Natural England.	The sustainable growth strategy will be supported by improvements to the transport system, green infrastructure and services <b>as set out in policies 2, 3 and 4.</b>
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## Additional information subsequent to submission of the GNLP

126. Subsequent to the submission of the GNLP, updates to evidence have continued to be collected to assist the examination of the plan.
127. A local housing needs (LHN) update study has been undertaken ([BN22.3](#)) mainly to provide up to date evidence on the type and tenure of housing need. In line with government guidance in PPG that it should be kept under review during the plan-making process, the study recalculated LHN using the standard methodology based on the latest data (see paragraphs 20-21 and section 8 of the study). This suggests housing need has fallen to 39,440 homes which is 1,100 homes less than the GNLP requirement. This recent evidence counters any arguments that the plan requirement should be increased.
128. Deliverability of sites has been a major consideration throughout plan-making. This is shown by:
- the inclusion of a Delivery Statement setting out how the delivery will be promoted and supported;
  - the policy 2 requirement for delivery plans to be submitted with applications for schemes for 100 dwellings plus to demonstrate delivery and guide ongoing contact with developers. Policy 2 also commits the authorities to use their legal powers to bring about strategically significant development, including compulsory purchase;
  - the consideration of the deliverability of sites through the initial site assessment process in the HELAA;
  - ongoing work on the delivery of sites to refine and evidence the housing trajectory. This includes the use of the most up to date, Inspector confirmed (based on recent appeals) 5-year land supply data for sites already granted planning permission and through the agreement of Statements of Common Ground for those sites which are newly allocated through the GNLP.
129. Accordingly, appendix 4 of this topic paper, which further evidences that the housing trajectory in appendix 6 of the submitted GNLP is appropriate, shows

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when all proposed allocation sites in the GNLP and other adopted plans and permissions will be delivered.

130. A particular focus has been placed on the deliverability of strategic sites. Appendix 5 of this topic paper looks in detail at sites of around 1,000 homes or more which are included in the GNLP or other plans which contribute to the growth strategy.
131. A further recent change which could be considered as additional or main modifications to the plan is that completion data for homes built in Greater Norwich in 2020/21 will shortly be available at examination. The data could be included in the GNLP for adoption, though this would require significant re-calculation of many of the figures used in the plan.

## Conclusion

132. The growth strategy proposed in the submitted version of the GNLP has been developed through detailed community and stakeholder consultation. Its development has taken account of a broad range of issues and views. It is well-evidenced and meets the plan's objectives.
133. The strategy builds on and further develops the strategic approach taken in Greater Norwich in recent years. The increased focus on the strategic growth area defined in the GNLP ties in with national growth areas and assists consideration of future strategic approaches, potentially including a new settlement or settlements. It also promotes the protection and enhancement of the built and natural environment and local landscapes. This is done in particular through the further development of the green infrastructure network and the retained strategic focus which allows continued protection of river valleys and strategic gaps.
134. The distribution of growth in the strategy maximises the capacity of brownfield sites, including promoting regeneration of key urban locations. It also promotes sustainable extensions and the retention and enhancement of services in our city, towns and villages, providing for sustainable amounts of growth in different parts of the local settlement hierarchy. As part of this, the GNLP promotes a pro-active approach to housing delivery through only allocating housing sites where a reasonable prospect of delivery has been evidenced.
135. The plan also provides choice and flexibility by ensuring there are enough committed sites to accommodate 22% more homes than "need", along with a "contingency" location for growth, should they be required to offset any non-

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delivery. Additional opportunities will be provided through the 70% of projected windfall development which is not included in the total housing figure for the plan. Our overall approach therefore builds in flexibility to support higher than trend economic growth incorporating the Greater Norwich City Deal.

136. As such, the proposed strategy offers the opportunity to strengthen Greater Norwich's role as a key part of the national economy. Economic growth in Greater Norwich is set to be in key sectors that will assist in the national and international adaptation to a post carbon economy, including in plant sciences and high value engineering.
137. Taken together, these measures will ensure that housing needs to 2038 will be fully met in sustainable manner, supporting the growth of the post carbon economy in Greater Norwich and more widely, assisting in tackling climate change and protecting and enhancing the many environmental assets of the area.

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