

Greater Norwich Local Plan

Topic Paper: Policy 7.1: The Norwich urban area including the fringe parishes

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Summary

This topic paper identifies the Norwich urban area (NUA), which consists of the City of Norwich and the twelve fringe parishes (5 in South Norfolk, 7 in Broadland), and summarises the drivers of policy for the NUA in the Greater Norwich Local Plan (GNLP). It considers the policy context and the evidence for each sub-area consisting of the city centre, the northern city centre, east Norwich and elsewhere in the urban area (including the fringe parishes).

The topic paper then explains that the various scenarios presented in the Growth Options document suggested growth of between 2,050 and 5,000 new dwellings could be allocated in the NUA tier of the settlement hierarchy.

There were a range of representations during Regulation 18, with the majority of respondents favouring Option 1 'concentration close to Norwich' and the second most popular option supporting the Cambridge-Norwich tech corridor. There was a general level of support for the approach to the city centre and to the approach for the urban area.

Between Regulation 18C and Regulation 19, there were changes to the number of dwellings identified for allocation; with an increase in east Norwich, Cringleford and Taverham, and decreases in the northern city centre and Easton. An additional allocation was proposed at Colney (GNLP0253 – Colney Hall) recognising a unique opportunity to provide housing for older people linked to university research. A contingency site was confirmed at Costessey, merging sites GNLP2043 & GNLP0581 as a single allocation (GNLP2043/0581) with the number of homes expected to be delivered from this site reduced from 1,000 to 800. Changes were made to the policies for some allocated sites in response to consultation representations.

At the start of the plan period in 2018, 57% of the total number of existing homes in the area were in the NUA. The plan provides for around 32,691 additional homes in the NUA between 2018 and 2038, forming 66% of the total housing growth for Greater Norwich. The great majority of these are on committed sites and on sites delivered between 2018 and 2020. 6,672 homes are to be provided on newly allocated sites.

The paper concludes that the growth proposed in the submitted GNLP at this level of the hierarchy is proportionate. It will make efficient use of brownfield sites, including both strategic regeneration sites and smaller scale infill. It also includes sustainable urban extensions on greenfield land with good access to jobs and services. As such, it will enable the retention and enhancement of local services, thus supporting a vibrant urban economy and a sustainable pattern of growth.

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Purpose

1. This topic paper is part of a series of papers that provide further justification and explanation of policies in the Greater Norwich Local Plan (GNLP) to support its consideration at examination. The paper covers [policy 7.1](#) for the Norwich urban area (NUA) including the fringe parishes. It should be read alongside [policy 1](#) and its supporting text, [Site Assessment Booklets](#) (B1.2 – B 1.13) for each settlement, and the [Statement of Consultation](#) (A8) for each stage of plan-making.
2. Policy 7.1 covers issues relating to:
 - Norwich city centre;
 - Strategic regeneration areas in the Northern City Centre and East Norwich;
 - Strategic urban extensions to the Norwich urban area and
 - Elsewhere in the urban area which includes the fringe parishes.
3. Policy 1 of the submitted GNLP defines the urban fringe as the South Norfolk parishes of Colney, Costessey, Cringleford, Easton and Trowse; and the Broadland parishes of Drayton, Hellesdon, Old Catton, Sprowston, Taverham, and Thorpe St. Andrew. The NUA consists of the Norwich City Council local authority area and these urban fringe parishes (see map in Appendix 2).
4. Achieving growth in this location will be a significant factor in achieving the draft objectives and the overall vision: The NUA allocates the highest number of new homes in the most sustainable location within the plan with a proposed 31% increase in homes to 2038 providing 66% of housing growth in the plan. This approach maximises brownfield development and provides for sustainable urban extensions, focussing development in locations with the best access to jobs, services and existing and planned infrastructure. It is important that growth in this area takes account of the fact that large proportions of the NUA are within Conservation Areas or contain heritage assets such as locally and statutory listed buildings.
5. The topic paper covers the following issues:
 - The policy approach for the city centre, including the defined Northern City Centre “strategic regeneration area”, to promote and balance a wide range of potentially competing uses that will cover the economy, retail and main town centre uses, leisure, culture and entertainment and the visitor economy, housing, the natural and built environment, access and transport;
 - Policy for East Norwich, the second “strategic regeneration area” in the city;

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- Policy for the remainder of the city and fringe parishes in the urban area; including strategic urban extensions and identification of a large contingency site at Costessey for 800 dwellings;
- Site allocation policies selected to meet the housing need in this element of the plan hierarchy, including updates made since the Regulation 18C consultation;
- A copy of policy 7.1 and a map of the NUA housing growth are included as appendices.

6. Changes made since the Regulation 18C draft include:

- The East Norwich strategic regeneration sites have been combined to a single allocation with an increased housing density;
- Following the decision by the secretary of state to refuse the called in planning application for Anglia Square, the approach to this key site in the Northern City Centre regeneration area has been amended in response to the findings;
- The approach to evening and late-night leisure use across the city centre has been amended;
- The housing numbers on the contingency site at Costessey have been reduced from 1,000 to 800, and consideration was given to allocation of this site in the plan.

Background

7. The historic approach to planning for Norwich city centre, both through the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS), which was adopted in March 2011 with amendments adopted in January 2014, and collaborative joint working with partner authorities and stakeholders prior to that, has embodied the “town centres first” principle for many years and has been cited as an example of best practice by central government. The success of this approach has relied on:

- fostering an attractive and distinctive living and working environment,
- protecting and conserving built and natural heritage,
- encouraging housing on all suitable city centre sites, mainly as part of mixed-use development,
- actively promoting and integrating new retail and other town centre uses in the city centre and resisting out of centre developments
- managing shopping frontages to protect their retail function,
- mitigating the impact of motor traffic and improving accessibility and connectivity for pedestrians, cyclists and public transport.

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8. The GNLP's city centre strategy is intended to continue this approach to ensure success going forward.
9. The JCS identified a settlement hierarchy for Greater Norwich, to ensure growth was directed in proportion to the level of local service provision. The remainder of the NUA, including the fringe parishes, was defined as the area next to the City of Norwich, but lying in other administrative districts, which is predominantly developed including open spaces encompassed within the developed area. The GNLP continues this approach, planning for new development appropriate to the local range of services and facilities.
10. The JCS also included a 'Norwich Policy Area' (NPA) and a 'Rural Policy Area' (RPA); these separate policy definitions originated in wider strategic plans (the Norfolk Structure Plan, the East of England Plan). The Growth Options topic paper set out that this policy approach has been updated in the GNLP. Reflecting the main axis of growth which had been established by the JCS from the north-east to the south-west of the city, and the promotion of the "Cambridge Norwich Tech Corridor" in New Anglia LEP's strategies, the submitted GNLP defines a "strategic growth area".
11. Benefits of the strategic growth area are:
 - 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) and
 - assisting the ability to access external funding and emphasise the role that Norwich, in particular the city centre and the Norwich Research Park (NRP), plays as a driver of the regional economy.

Context

National Policy Context

12. The National Planning Policy Framework ([NPPF](#)) sets out a number of requirements of relevance to the NUA including planning for:
 - a vibrant diverse and viable town centre at the heart of the community (NPPF paragraph 85) "*promote their long-term vitality and viability by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters*",
 - a rich historic environment (NPPF Section 16 – paragraph 185 - *Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats*),

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- Healthy, inclusive and safe housing and public realm, NPPF paragraph 91 encourages planning to “*Promote social interactions, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages*” A significant proportion of the allocated development in the City of Norwich is proposed on mixed-use sites which is in accordance with this policy of the NPPF. Further to this, the NPPF requires plans to “*Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling*”. This is addressed in paragraph 312 of the supporting text and point 6 of policy 7.1.
- Opportunities for large strategic allocations and urban extensions (NPPF paragraph 72) *The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.* The submitted GNLP proposes allocation of such sites in the NUA at the East Norwich Strategic Regeneration Area, the Northern City Centre Regeneration area, Three Score - Bowthorpe, Easton, Taverham, the North East Growth Triangle and Cringleford. NPPF paragraph 103 states “*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health*” The GNLP is fulfilling this requirement by locating 66% of the proposed GNLP development in the NUA including the larger scale development allocations mentioned.

Local Policy Context

Norfolk Strategic Planning Framework (NSPF)

13. This is a county level agreement between the planning authorities on approaches to strategic infrastructure, housing and job numbers and common policy approaches which is a Statement of Common Ground that addresses the Duty to Cooperate. Importantly, the NSPF 2021 ([B2.3](#)), along with agreements with neighbours in Suffolk, states that Greater Norwich will provide for all its housing and jobs growth needs within its own boundaries as will its neighbours. It also states that Greater Norwich City Deal growth requirements, agreed with

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Government in 2013, will be met through the GNLP. The NSPF and work with Suffolk authorities meets the government's requirement for a Statement of Common Ground and the "Duty to Co-operate." The NSPF recognises the NUA's influence in providing jobs, retail, healthcare and a broad range of services and facilities as well as homes for a significant proportion of the county's population. It defines three distinct housing markets in Norfolk, with Norwich being the largest.

Norwich Area Transport Strategy

14. Transport priorities which influence the GNLP are set out in several other strategies including: the Norfolk Local Transport Plan; the Norwich Area Transportation Strategy; the emerging Transport for Norwich strategy and Transforming Cities. Norfolk County Council are working in partnership with the local authorities in the GNLP area to produce Local Cycling and Walking Infrastructure Plans (LCWIPs) The Greater Norwich area is currently undergoing a period of [engagement](#) with the local community and key stakeholders. These are in addition to national and regional rail and road investment strategies and programmes.
15. The Growth Triangle Area Action Plan identifies two new railway stations in the Urban Fringe, one at Rackheath and one at Dussindale, which has outline planning consent.
16. Local transport strategy for the NUA is shaped by Norfolk County Council's third local transport plan (2011) and the Norwich Area Transportation Strategy (2013) (NATS), known as Transport for Norwich Strategy (TfN) which are being prepared alongside the GNLP. TfN will include measures to improve walking, cycling and public transport facilities to support a significant modal shift in the urban area during the plan period. The Norwich area has been successful in securing a place in the government's Transforming Cities Fund (TCF) programme. This is bringing significant investment to the transport networks in the city and surrounding area. The first smaller tranche of funding has already seen a small number of quick win schemes delivered in the city, further improvements through the larger second tranche are expected in 2022/23.

Minerals and Waste Local Plan

17. Norfolk County Council is the Minerals and Waste local authority. It is preparing a local plan review to consolidate its three current adopted plans into one and to extend its plan period to 2036. The GNLP therefore does not cover minerals and waste issues. A number of sites in NUA are underlain by safeguarded minerals resources, as such reference is made to the relevant Norfolk Minerals and Waste Core Strategy Policy CS16 in individual site allocation policies. Carried forward allocations R31- Heigham Water Treatment Works and R36 - Mile Cross Depot within the Norwich City Council area is within the consultation area for a safeguarded waste management site. At the East Norwich Strategic Regeneration

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Area Norfolk Minerals and Waste Core Strategy Policy CS16 applies, as parts of the sites are within the consultation area of a safeguarded mineral infrastructure.

The GNLP and other Local Plan Documents

18. At the local level the district councils' visions, objectives, priorities and ambitions have influenced this strategy, mainly through the GNLP Vision and Objectives. These documents are the Norwich City Vision 2040 and Broadland and South Norfolk's Our Plan 2020 to 2024.
19. The JCS, along with adopted Site Allocations Plans, the Area Action Plan for the North East Growth Triangle, and Cringleford Neighbourhood Plan, already set out where nearly three quarters of the housing (the existing commitment) will be located, as well as the locations for the majority of the jobs growth required by the GNLP to 2038.
 - In 2018 NUA consisted of 106,100 homes (57% of the total 187,500 homes in Greater Norwich).
 - The GNLP plans for an additional 32,691 homes in the NUA to 2038 (a projected total of 138,791 in NUA by 2038 which is a 31% increase from existing and 66% of total planned housing growth).
 - Of the 32,691 homes planned for NUA
 - 26,019 homes are existing commitment and uplift on committed sites.
 - 6,672 homes are new allocations.
20. When adopted, the GNLP will supersede the current JCS and the Site Allocations Plans in each of the three districts. The majority of the undeveloped sites in the Site Allocations plans are re-allocated through the GNLP.
21. The GNLP will not replace the existing adopted Area Action Plan (AAP) for the North East Growth Triangle (NEGT), although additional allocations are made through the GNLP in this area. The GNLP will be used in conjunction with the adopted AAPs, Development Management Plans for the three districts and Neighbourhood Plans.
22. Growth is distributed in line with the settlement hierarchy to provide good access to services, employment and infrastructure. It is provided through urban regeneration, along with sustainable urban extensions.

Neighbourhood Plans (In the Norwich and Urban Fringe parishes)

23. **The Cringleford Neighbourhood Plan** was formally made part of the development plan by South Norfolk Council on 24th February 2014. The Neighbourhood Plan will help shape the future of Cringleford to 2026. The Neighbourhood Plan covers the whole of the parish of Cringleford and was

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prepared by the parish council. The Neighbourhood Plan provides for approximately 1,200 new dwellings whilst promoting integration of the community and enhancement of the open and green character of the village.

24. **Drayton Neighbourhood Plan** has been in place since July 2016 and covers the period to 2026. The vision for the Neighbourhood Plan is based on the desire to maintain the quality of life in the parish by preserving the balance between the built and green environment, improving negative elements of the built environment and infrastructure whilst developing and strengthening opportunities for the people of the parish, encouraging increased prosperity, and building up the facilities available to residents, and those that work there. Drayton Neighbourhood Plan does not allocate any sites for development.
25. **Hellesdon Neighbourhood Plan** has been in place since December 2017 and covers the period to 2026. The vision for the Hellesdon Neighbourhood Plan is to be a green, peaceful and friendly suburb for people of all ages with a good range of community facilities; one step from a vibrant city and one step from the Norfolk countryside. There are no sites allocated for development in the Hellesdon Neighbourhood Plan.
26. **Rackheath Neighbourhood Plan** has been in place since July 2017 and covers the period to 2037. The vision for the Neighbourhood Plan is that by 2037 Rackheath will be a small attractive rural town with a village feel, developed in a way that is sensitive to its rural location and heritage. It will have a strong and vibrant resident community and thriving local businesses. The Rackheath Neighbourhood Plan does not allocate sites for development; however, it provides policy responses to allocations for development within the [Growth Triangle Area Action Plan](#) (GT16, GT17, GT18 and GT19).
27. **Sprowston Neighbourhood Plan** has been in place since May 2014 and covers the period to 2026. The vision for the Neighbourhood Plan is by 2026 the community of Sprowston will be strong, cohesive, creative and forward-looking. The community will be safer, healthier, more prosperous, sustainable and inclusive. High quality homes will meet people's needs and aspirations in attractive and sustainable places. People will have access to good quality jobs, essential services and community facilities, with less need to use a car.
28. **Thorpe St Andrew (Draft) Neighbourhood Plan** is in progress at the time of writing, but this has not been made.
29. **Norwich Cathedral, Magdalen and St Augustine's Neighbourhood Plan area** – A proposed boundary for a Cathedral, Magdalen and St. Augustine's Neighbourhood Plan Area and proposed designation of the Cathedral, Magdalen and St. Augustine's Neighbourhood Forum were considered by Norwich City Council's Cabinet on 13 June 2018 and by the Broads Authority's Planning

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Committee on 22 June 2018. Both authorities resolved to refuse both applications. Norwich City Council also resolved to designate an alternative neighbourhood area for the northern city centre area. The decisions to refuse the applications and to formally designate the alternative neighbourhood area were made on 25 June 2018. Some progress has been made in recent months to progress a Neighbourhood Plan on an alternative neighbourhood area. It is likely that an application will be made in the next few months for neighbourhood forum designation for the northern city centre neighbourhood area.

Evidence

Sustainability Appraisal Report for the GNLP

30. All the GNLP policies and sites have been assessed against the Sustainability Appraisal (SA) objectives in order to consider any negative impacts identified and to mitigate through policy where possible.
31. The Regulation 18 draft SA ([B23.3](#) Appendix C10) of policy 7.1 scored:
- **‘major positive’** for Housing, Population and Communities, Education, and Economy
 - **‘positive’** for Deprivation, Health, Transport and Access to services.
 - **‘negative’** for Biodiversity, Geodiversity and GI, and Water
 - **‘major negative’** for Air Quality and Noise, Climate change mitigation and adaptation as well as Natural resources, Waste and contaminated land.
32. The SA report states that this is primarily due to the scale of the development proposed, with significant allocations for housing, employment site and infrastructure across the area.
33. The proposed allocations within Norwich are likely to result in adverse impacts in terms of poor air quality associated with central Norwich AQMA. The level of increased population would be expected to increase traffic volumes and energy demand, which would be expected to result in an increase of pollutant emissions. It is reasonable to expect that an increase in the amount of development will give rise to an increase in pollutant emissions. However, the strategy for future development is for the growth to be focussed in the more sustainable locations where residential development can be located in relatively close proximity to everyday services and employment etc. This gives the potential for non-motor vehicle modes of travel, such as walking and cycling. Also, the strategy has had regard to the provision of public transport, to give the opportunity for longer journeys to be made by non-private motor vehicle where possible. It should also

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be remembered that the future residential growth is to provide homes for a population that largely already exists, whether in the local area or further afield, and so increases in traffic generation caused by people moving into an area has a consequent reduction in those areas that they have moved from. So, what might be a specific impact on air-quality in one location needs to be weighed against the overall situation. The objective through the plan is to have development that is located and designed to minimise the disbenefits arising from it. In terms of traffic and air quality impacts this should be assisted by the national initiatives to reduce carbon emissions, including the move towards low carbon vehicles.

34. The minor negative for local biodiversity is largely due to potential impacts on designated or local diversity sites as well as the loss of previously undeveloped land and ecologically important soils. The expected adverse impacts to biodiversity sites include those associated with development such as increased recreational pressures, air quality reductions, as well as direct negative impacts on the integrity of these sites and habitats. However, Policies 2 and 3 would be expected to result in positive impacts on biodiversity, associated with the enhancement of the natural environment, and provision of green infrastructure and water.
35. [The Sustainability Appraisal Report](#) for the Regulation 19 Draft confirms the following policy mitigation measures outcomes deriving from policy 7.1 in relation to SA Objectives;
- Policy mitigation for identified impacts on Human Health: Access to Leisure facilities / Encouraging Healthier Lifestyles: likely to benefit from Access to leisure facilities, as sites will seek to increase the provision of open space across the Plan area. - (page 138),
 - Policy mitigation for identified impact on Landscape: Impacts on the Setting of the Broads National Park - would be expected to reinforce GNLP Policy 2, ensuring development within Norwich city takes account of its setting adjacent to The Broads (Page 153),
 - Policy mitigation for identified impacts on landscape: Loss of tranquillity: policy would help to reduce the noise pollution at sites within Norwich, helping retain tranquillity by seeking impact of noise and light pollution from surrounding features in new development (page 154),
 - Policy mitigation for identified impacts on population and material assets: reduced access to services and facilities: would support the development of a new primary school in Norwich and would be expected to ensure school capacity is increased throughout the plan area in order to meet the identified needs.
 - Policy mitigation for identified impacts on population and material assets: 'reduced access to services and facilities': GNLP policy 7.1 would support the development of a new primary school in Norwich and would be expected

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to ensure school capacity is increased throughout the plan area in order to meet the identified needs. (page 167),

- The proposed development within the GNLP would be expected to increase household waste generation within the plan area by approximately 31.5%. Although GNLP Policy 2 seeks to support sustainable waste management, there is little scope to reduce the quantity of waste generated per household. It is agreed that the plan cannot itself reduce the amount of waste generated per household. However, the increase in household waste generation may not be as high as suggested. The level of waste generated in a household largely reflects the number of people in a household. A large part of the need for homes arises from the existing population and the general trend for a reduction in household sizes. Also, it is expected that some people will move into the Greater Norwich area from outside it. Therefore, the additional waste generated in the new homes provided through the Plan, should be compensated to a degree by reductions elsewhere arising from this movement away from other areas and reduction in household size.
- Policy mitigation for identified impacts on soil: Loss of Soil resources and BMV (best and most versatile) land – policy 7.1 aims to promote brownfield development by allocating a significant proportion of the housing requirements within Norwich City. (page 176)
- Increased demand for water. The introduction of 110,367 new residents would be expected to result in increased pressure on the local water resource. The increase in the number of residents arising from the development is over-stated as a large proportion of the need for new homes arises from the existing population. Nevertheless, it is reasonable to expect that an increase in the amount of development will give rise to an increased pressure on the local water resource. However, the strategy for the location of development has had regard to the availability of water supply (and disposal). A Water Cycle Study has been undertaken that considers the water resource and water supply and disposal, including capacities to accommodate development. Also, policy 2 sets out specific requirements for development in relation to minimising pollution, ground conditions, efficient water management, avoiding and minimising flood-risk, sustainable drainage etc. Therefore, whilst increased development (and people) may put pressure on the water resource, the plan helps to limit this and avoid significant impacts.

The UEA Development Framework Strategy (DFS) (Updated June 2019 (Draft))

36. The original DFS was endorsed in November 2010. The document provided an invaluable framework and successful planning tool for the University of East Anglia (UEA), Norwich City Council and other stakeholders. Since the rate of growth and

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delivery has been greater than anticipated by that document, an update has been produced to inform the preparation of the Greater Norwich Local Plan. The DFS 2019 Update ([B25.1](#)) sets out the growth plans of the UEA to 2036 and devises a strategy of development required to accommodate this growth. A process of site selection has been undertaken to explore the opportunities in accordance with the UEA principles to achieve the required growth on the most appropriate sites in the UEA's ownership. The UEA is also preparing a Strategic Development Framework (SDF) which will provide a 50-year framework to govern future development at UEA. It will build upon the work of DFS 2019, specifically looking at intensification of sites within existing campus boundary. The UEA will be seeking endorsement of the SDF from the council towards the end of 2021.

Strategic Flood Risk Assessments

37. A number of sites within the Norwich urban area are located adjacent to the rivers Wensum or Yare; the Level 1 ([B21.1](#)) and Level 2 ([B21.6](#)) Strategic Flood Risk Assessments provide information to assist allocation of these key brownfield sites.

The Employment Town Centre and Retail Study 2017 and 2020 update

38. This is mainly covered in policy 6, however it is worth noting here that the potential impacts of Brexit and the Covid 19 pandemic for town centres and retailing have recently been considered in the *Employment Town Centre and Retail Study 2020 update* to this study ([B3.9](#)). There have been initial negative impacts caused by the pandemic in 2020, whilst it is hoped that there will be a bounce back from 2021 onwards, available comparison goods expenditure will be materially lower over the plan period. The updated assessment takes into account the fall in available expenditure since 2017 and shows an over-supply in the NUA of circa 20,000sq m net. These levels of 'negative capacity' confirm the current draft strategy for retailing in the submitted GNLP which is not to allocate sites/locations for net additional comparison goods floorspace. Instead, the forecast over-supply reinforces the proposed approach which seeks to concentrate upon existing provision in terms of redevelopment, refurbishment/remodelling, and, in some instances, down-sizing and repurposing to other land uses appropriate to town centre environments.
39. The report also reviews the implications of recent changes to the use class order which will provide flexibility in town centres but may also negatively impact town centres through flexibility of out of centre locations drawing footfall and employment away. At the time of publication of the study updates the government had recently published a consultation on further changes which would allow Class E land uses to convert to residential use. It was considered at the time that, should it be implemented, *"it is likely to change the landscape in town centres and potentially impact upon the contribution of commercial floorspace. The level of change will*

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clearly be dependent on the suitability of individual properties for conversion, which may reduce the impact on core shopping areas, although it will nevertheless, if implemented, be a significant change for the future of town centres. It will also have an impact upon how the councils draft their development management policies and approach development management decisions". Subsequently, the government has announced that this change to permitted development has come into effect. This change will impact existing Development Management policies for Norwich City Council and is likely to result in an increased amount of windfall development not previously accounted for in the GNLP. The City Council is considering the possible introduction of an article 4 direction to control changes of use from office to residential uses in the city centre. On 7th July 2021 Norwich City Council approved the proposal to introduce an article 4 direction which is due to come into effect in July 2022.

The Greater Norwich Green Infrastructure Study (2020)

40. This study ([B7](#), particularly B7.1 to 7.9) provides information on the existing Green Infrastructure (GI), Biodiversity and designated Historic Environment assets for proposed allocations within Greater Norwich. It also outlines opportunities for potential enhancements of GI related to these based on existing data. Potential GI opportunities are outlined for each set of allocations, but an overall set of principles should be considered within the urban area of Norwich:

- Maintain and enhance links from sites to existing greenspace;
- Maintain existing on-site features such as trees where possible;
- Enhance or promote links to the existing cycling and walking assets, particularly Norwich core cycle routes (Pedalways) and the Riverside Walk;
- Consider the role of wider cycling and walking infrastructure development in association with site allocations.

Regulation 18 Consultation – Call for sites

41. This important first stage in the site allocation plan process was held from May to July 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. Potential uses include housing, employment, leisure and community uses. For more information about sites in Norwich and the urban fringe, please refer to the site assessment booklets, which are produced at a settlement level.

42. Number of sites submitted for Norwich and Urban Fringe:

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Location	Number of sites submitted
Norwich	23
Colney	8
Costessey	11
Cringleford	4
Drayton	7
Easton	2
Hellesdon	0
Old Catton	0
Sprowston	3
Rackheath	4
Taverham	5
Thorpe St. Andrew	3
Total	70

Regulation 18A Consultation – Site Proposal and Growth Options Consultation (January to March 2018)

43. This consultation dealt with strategic policies to guide how and where different kinds of development might be distributed over the whole area.

44. Paragraph 4.6 of the [Growth options document](#) states “*The majority of the planned growth is focussed in and around Norwich, with the city centre and other strategic employment sites supporting the area’s regional, national and international economic functions and the suburbs and fringe parishes providing growing sustainable communities*”. The baseline assumptions relating to NUA set out in

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paragraphs 4.49 to 4.51 emphasised the priority of making the most efficient use of land through development of brownfield sites. All six growth options presented in figure 3 promoted the same high level of growth in Norwich with varying degrees of growth in the wider NUA. This gave a range of between 2,050 and 5,000 additional new homes in Norwich and the fringe parishes.

45. **Question 2** asked “*Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1 to 4.7?*”
46. 96 respondents were in favour of the broad strategic approach proposed for new jobs, homes and infrastructure. The approach included 45,000 additional jobs by 2036, along with 42,865 new homes (of which 7,200 would be on new sites) to be focussed in and around the main urban area and in towns and villages with a range of services.
47. 56 respondents did not agree with the proposed approach. Development industry respondents were generally supportive of the strategic approach; or, sought more development to meet the City Deal’s growth target, or to support 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.
48. Paragraph 4.49 of the Growth options document stated, “*To meet national policy requirements to make the most efficient use of land, it is critical that the best possible use is made of brownfield land, which is mainly within Norwich and the urban fringe*”. Each of the six growth options proposed the same level of growth for Norwich, with varying levels proposed for the urban fringe. This approach was taken as the intention throughout plan-making has been to maximise the potential for development in the NUA, particularly on brownfield sites.
49. **Question 9** asked: “*Which alternative or alternatives do you favour?*” for the six growth options.
50. There was a broad and varied response to this question, with Option 1 (concentration close to Norwich) being the single most favoured growth option and Option 3 (supporting the Cambridge-Norwich tech corridor) the second most favoured, but a significant minority of respondents selected none of the presented options and argued in favour of alternative scenarios.
51. Two options were proposed for the approach to Norwich City Centre; Question 14 asked: “*Should the area defined as the city centre be extended?*” Suggested possible areas which could be included in the extension to the city centre boundary were:

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- Land to the west of the Inner Ring Road between Dereham Road and the Barn Road roundabout;
- Land near the River Wensum to the east of Norwich City Football Club (Laurence Scott Electromotors, the Utilities Site and the Deal Ground)

52. Overall, many more respondents favoured retaining the current city centre planning boundary than those who favoured extending it, with 53 respondents against extension and 18 in support

53. **Question 15** asked: “*Do you support the approach to strategic planning for the city centre in 4.80 of the document?*” The key objectives set out in this paragraph were:

- increasing employment, particularly in high value growing sectors;
- increasing the residential population;
- enhancing the retail offer;
- maximising the tourism and leisure opportunities;
- creating a regional learning and innovation centre;
- enhancing connectivity, providing vehicular access to jobs, homes and shops, a public transport hub for the area and a green, walkable, cycle friendly centre.

54. Many more respondents supported the proposed approach to strategic planning for the city centre (53) than opposed it (9). A number of respondents, both in broad support of and opposed to the proposed approach, suggested amendments to the proposed objectives or a change in their focus.

55. Six issues specific to the city centre were identified through evidence studies and experience of implementing the JCS which need to be addressed; these covered: offices, retailing, late night activities, housing development, air quality and cultural, visitor and education facilities.

56. **Question 16** asked: “*What should the plan do to reduce office losses and promote new office development in the city centre?*”

57. There were 60 responses to this question, the “headline suggestions” were:

- Find ways of making office buildings less attractive for residential conversion;
- Encourage residential conversion/redevelopment of obsolete stock to increase city centre population;
- Identify new opportunities and develop initiatives to provide for flexible modern office requirements;
- Ensure flexibility and responsiveness in planning for changing needs;

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- Restrain car-oriented office development in unsustainable locations;
- Ensure good transport links and parking;
- Approach issue in conjunction with a vision to keep the city centre vibrant: prioritise development in specific areas;
- Ensure a supply of cheaper accommodation;
- Strong commercial promotion of the city centre needed;
- Nothing that the plan can do – loss of city centre office space is inevitable due to systemic change in working practices.

58. **Question 17** asked: “*What should the plan do to promote retailing in the city centre?*”

59. There were 60 responses to this question, the “headline suggestions” were:

- Ensure comfort and accessibility for shoppers; enhance the public realm;
- Increase the resident population in the city centre;
- Recognise and support local independent and speciality retailing as well as (or instead of) national chains;
- Provision of low-cost accommodation and reduced rates/rents for small businesses;
- Improve Norwich Provision Market;
- Retail focus vs. diversification (points were made from both perspectives, some in favour of prioritising retail, some in favour of further diversification);
- Provide for the expansion/intensification of city centre shopping;
- Acknowledge the core role of retailing and coordinate the marketing of the city centre;
- Consider the impacts of traffic management;
- Improve sustainable transport;
- Improve parking availability and tariffs;
- Restriction on out of town developments;
- Enhance, support and develop district and secondary shopping centres;
- Respond to a changing retail landscape and national economic trends;
- Acknowledge the importance of sustainable retailing;
- Nothing that the plan can do.

60. **Question 18** asked: “*Should the focus for late night activities remain at Riverside, Prince of Wales Road and Tombland or should a more flexible approach be taken?*”

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61. There were 58 responses to this question;
62. 33 respondents supported retaining the existing late-night activity zone or argued for tight controls to “close down the clubs which are already there”
63. 6 respondents supported more flexibility, with various caveats.
64. 10 respondents answered Yes with no additional comment made or commented merely to highlight the ambiguity of the question – as noted a Yes response could mean an expression of support for either the existing approach or a more flexible one.
65. 4 respondents were undecided or did not wish to comment at this stage.
66. 5 respondents made additional points without a clear preference for either option.
67. **Question 19** asked: “*What should the plan do to promote housing development in the city centre?*”
68. There were 54 responses to this question, the ‘headline’ suggestions were:
- Make better use of redundant office and commercial space;
 - Make effective use of brownfield land and ensure realistic allocations;
 - Increase opportunities for and supply of affordable housing;
 - Increase densities where appropriate, promote a diversity of uses;
 - Ensure the development of homes is coordinated with supporting services.
69. **Question 20** asked: “*How can the plan best support cultural, visitor, and educational uses in the city centre?*”
70. There were 53 responses to this question, presenting a diverse range of views. The ‘headline’ suggestions were:
- Exploit the potential to develop arts and cultural facilities (under this issue, several respondents supported the establishment of a large venue or concert hall);
 - Better facilities management/promotion;
 - Improve visitor accommodation;
 - Improve infrastructure and accessibility.
71. One favoured option for the remainder of the urban area and the fringe parishes was put forward, this promoted continuing the current approach of supporting regeneration of suburbs (north, west and east being priorities); Well-designed development which improves townscape, retains character, improves gateways and increases densities where appropriate; Further development of the green infrastructure network, including protecting the landscape setting of Norwich and re-establishing heathland habitats; Retaining and improving local jobs; Promotion

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of Norwich as a learning city; Retention and enhancement of local services; Transport improvements.

72. **Question 21** asked: “Do you support Option UA1 for the remainder of the urban area and the fringe parishes?” This relates to the fringe parishes as defined in paragraph 3 of this document.
73. A total of 72 responses were received to this question. Many more respondents supported the favoured option of continuing the current approach for planning for the remainder of the urban area and the fringe parishes (60) than opposed to it (6). A number of respondents in broad support suggested some amendments to the proposed issues to be covered, including some requesting a Green Belt. Some of those opposed questioned the effective implementation of the approach up to now. Some questioned the fact that only one option was available, others requested a clarification on issues such as the definition of fringe parishes and the meaning of specific terms such as “area wide traffic constraints” and Norwich being a “Learning City”.
74. For more information about representations made to the Regulation 18 A Consultation, see the [Statement of Consultation](#), which is organised by consultation question.

Regulation 18B – New, Revised and Small Sites Consultation – October to December 2018

75. Approximately 230+ additional sites, or revisions to existing sites were put forward through the Regulation 18A consultation. 36 of these sites were in the NUA, consisting of 8 revised sites and 28 new sites. The number of sites consulted on for the NUA are set out by parish in the table below:

Location	Revised sites	New sites
Norwich	1	10
Colney	3	0
Costessey	1	5
Cringleford	0	0
Drayton	1	0
Easton	0	0
Hellesdon	2	3

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Old Catton	0	0
Sprowston	0	1
Rackheath	0	3
Taverham	0	4
Thorpe St. Andrew	0	2
Total	8	28

76. For more information on the sites, please refer to the [site assessment booklets](#), which are organised at a settlement level.

Regulation 18C – Regulation 18 Draft Strategy and Site Allocation Consultation – January to March 2020

77. This consultation was in two parts:

- Part 1 – On the planning strategy for growth in Greater Norwich from 2018 to 2038
- Part 2 – GNLP Sites document, on allocation policies for the sites to deliver the strategy.

78. The following questions covered [policy 7.1](#) – The NUA including the fringe parishes:

79. **Draft Plan Question 38:** *Do you support or object or wish to comment on the approach for the city centre? Please Identify particular issues.* There were 19 representations, (6 Support, 5 Objections and 8 Comments). Representations were received from a variety of sources including developers/site promoters, statutory consultees, political and cultural groups.

80. There was support for the approach to culture, the economy, retail and leisure, and recognition that development should conserve and enhance the historic environment and should be of appropriate scale and massing. The Norwich Green Party supported attracting businesses to the city centre and discouraging the use of peripheral locations by constraining car parking levels allowed for out-of-town locations or introducing parking charges in such locations.

81. Objections focussed on the approach to Northern City Centre Regeneration being centred on the Anglia Square proposals. Objectors proposed an alternative lower-rise medium -density scheme. Concerns were also raised regarding high densities proposed at Carrow Works. Some considered that there is over reliance on both

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Anglia Square (GNLP0506) and East Norwich Regeneration (GNLP0360, GNLP3053, R10), with the plan failing to distribute development throughout hierarchy. This results in a misalignment between spatial and economic strategies.

82. Comments received were primarily from site promoters which queried the ability to deliver the proposed volume of housing in the NUA, feeling that there is an over reliance on large strategic sites with insufficient evidence of deliverability in the plan period. Historic England and Norwich City Council raised concerns regarding the reference to landmark buildings at the gateways to the city centre, considering that this could be wrongly interpreted as simply meaning tall or large scale. Historic England suggested that a 'tall building' policy is necessary for Norwich.
83. **Draft Plan Question 39** was: *Do you support or object or wish to comment on the approach for East Norwich? Please Identify particular issues.* There were 17 representations (4 Support, 3 Objections, 10 Comments).
84. Support for the approach to East Norwich as a key area for regeneration was received in principle from Norwich Green Party and agents with suggestions relating to the sustainability of the sites and references to heritage and the natural environment.
85. Objections were received from members of the public and Historic England. Members of the public raised issues regarding the increased population in this location, with concern that the proposed number will be too great for existing facilities. They consider that the existing transport infrastructure lacks capacity and that the scale of development shall result in light pollution. Historic England raised concerns relating to the impact on Carrow Abbey/Priory and other heritage assets in the East Norwich area. They also had doubts that the developable area is available to facilitate the level of development expected from the allocation policy.
86. Comments were received from agents, members of the public and statutory consultees. Members of the public and statutory consultees referenced flood risk, heritage and promotion of wildlife/green space assets; consideration of provision of greenspace within development; clarity is required regarding potential energy generation and assurance that any such provision shall be truly 'green'; Agents raised concerns relating to the deliverability and therefore over reliance on the quantum of housing proposed in the East Norwich strategic regeneration area, with some suggesting that a longer term allocation be better suited to plan review.
87. **Draft Plan Question 40** was: *Do you support or object or wish to comment on the approach for elsewhere in the urban area including the fringe parishes? Please Identify particular issues.* There were 40 representations (8 Support, 9 Objections, 23 Comments):
88. Support for the approach taken to elsewhere in the urban area was received from agents/developers, a neighbouring authority, Drayton Parish Council and the Yare

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Valley Society. Support was expressed by agents in response to proposed allocation of specific sites in this section of the hierarchy; retention of Growth Triangle AAP sites. They supported increased delivery in fringe parishes and higher densities. The Yare Valley Society supported the commitment to enhancements to green infrastructure, though raised concerns relating to expansion of UEA into sensitive landscapes. Drayton Parish Council supported the approach to no additional site allocations in Drayton.

89. Objections received from members of the public relate to a need for open space and light industries in Hellesdon; Infrastructure improvements were required in Sprowston to contribute to improving the quality of life for residents; there was also concern that Sprowston is subject to significant risk of surface water flooding which has not been adequately addressed. Norwich Green Party contested that the urban extension at Taverham would be car dependent which would have a negative impact on environment including the River Wensum. Historic England considered that the proposed approach would not protect the city's character, conservation areas and significance for designated heritage assets. Agents raised concerns relating to over reliance on the Growth Triangle given past under delivery. Further comments included requests for retention/provision of green infrastructure and concern regarding additional pressure on already constrained infrastructure in the fringe parishes. Highways England provided comments on the proposed allocation impacts on the highway network.
90. For more information about representations, see the [Statement of Consultation](#), which is organised by consultation question
91. The [Regulation 18C draft sites plan](#) proposed 4,395 new dwellings on new housing allocations across the NUA. This level of growth was within the range of dwellings identified in the Growth Options document, and took account of the various constraints, and also outstanding commitment (both permissions and undeveloped former allocations). All the brownfield sites submitted in the NUA which show evidence that they can be developed have been allocated in the GNLP. Most have been allocated for mixed use development including housing. More detail is available in the Site Assessment Booklets, which are ordered by settlement. The distribution of housing allocations was as follows:

Norwich City Centre

92. 180 dwellings were on new sites, plus carried forward allocations and existing permissions for 4,620 dwellings.
Total for Norwich City Centre = 4,800.

Representations received to Regulation 18C Draft Plan:

93. Norwich City Centre sites include:

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New allocations –

- **GNL0409R, Land at Barrack Street/Whitefriars** – 5 representations received (0 Support, 2 Objections, 3 Comments). Objections were from the promoting agent regarding the split of the site, proposed uses and parking issues, and Historic England who are broadly supportive of the principle of redevelopment of this site subject to appropriate approach to heritage.
- **GNL0451, Land adjoining Sentinel House** - 2 representations were received (1 Objection, 1 Comment). The objection received was from Historic England with suggested alterations to policy wording.
- **GNL2159, Land at 84-120 Ber Street, 147-153 Ber Street and Mariners Lane Car Park** – 3 representations received (2 Objections, 1 Comment). One objection was from the site promoter on behalf of the landowner withdrawing part of this site from consideration; suggesting that existing allocation CC2 (which forms part of this proposed site) is carried forward instead. Historic England is broadly supportive of the redevelopment subject to some suggested changes.
- **GNL3054, The site at St Mary's Works and St Mary's House** - 3 representations received (1 Support, 1 Objection, 1 Comment). Support was received from the site promoter with suggested alterations to the draft policy wording. The objection received was from Historic England who suggested changes to the proposed policy.

Carried forward allocations –

- **CC3, 10-14 Ber Street** - 2 representations were received (1 Objection, 1 Comment). The objection received was from Historic England who suggested some amendments to the policy wording.
- **CC4a Land at Rose Lane/Mountergate (Mountergate West)** - 2 representations received (1 Objection, 1 Comment). The objection received was from Historic England who suggested some amendments to the policy wording.
- **CC4b, Land Mountergate/Prince of Wales Road (Mountergate East)** - 4 representations were received (1 Support, 0 Objections, 3 Comments). Support was received from the site promoter on behalf of the landowner with some suggestions for revisions to the policy wording. Historic England was broadly supportive of the redevelopment subject to some suggested changes.
- **CC7, Hobrough Lane, King Street** - 3 representations were received (1 Support, 2 Comments). The support received was from Historic England.
- **CC8, King Street Stores** - 4 representations were received (1 Objection, 3 Comments). Comments were received from the site promoter on behalf of

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the landowner with some suggestions for revisions to the policy wording. The objection received was from Historic England who suggested some amendments to the policy wording.

- **CC10, Land at Garden Street and Rouen Road** - 2 representations (1 Object, 1 Comment). The objection was from Historic England who suggested some amendments to the policy wording.
- **CC11, Land at Argyle Street** - 1 representation (1 Object). The objection was from Historic England who suggested some amendments to the policy wording.
- **CC24, Land to rear of City Hall** - 2 representations (1 Object, 1 Comment). The objection was from Historic England who suggested some amendments to the policy wording.
- **CC30, Westwick Street Car Park** - 3 representations received (1 Objection, 2 Comments). The objection was from Historic England who suggested some amendments to the policy wording.

East Norwich strategic regeneration area

94. East Norwich consists of three sites; consisting of one carried forward allocation and two new proposed allocations. A total of 2,000 dwellings were proposed for East Norwich Strategic Regeneration Area consisting of a 780 home commitment from carried forward allocations/an extant consent and 1,220 additional dwellings.

East Norwich strategic regeneration area sites consist of:

New allocations:

- **GNLP3053, Land at Carrow Works** - 6 representations were received (1 Support, 1 Objection, 4 Comments). The objection received was from Historic England who suggested some amendments to the policy wording. The site developer has commented regarding the approach taken to affordable housing contributions and the need for site specific consideration.
- **GNLP0360, Land at the Deal Ground, Bracondale and Trowse Pumping Station** - 9 representations were received (1 Support, 2 Objections, 6 Comments). Comments were received from the landowner's agent with some suggested amendments to the policy wording. Comments were also received from Tarmac Limited who run a rail connected asphalt and aggregates transshipment operation on adjoining land (within the heart of the allocation).

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Carried forward allocation:

- **R10, Utilities site** - 5 representations were received (2 Support, 3 Comments). Support was received from the landowner with some suggested alterations to the site allocation policy

Three Score (R38), Bowthorpe:

95. No dwellings on new sites, plus carried forward allocations and existing permissions for 900 dwellings.

Total for Three Score = 900

2 representations were received (1 Support, 1 Comment). The support was from Historic England who welcomed reference to heritage assets within the policy.

Other sites in Norwich:

96. 180 dwellings on new sites, plus carried forward allocations and existing permissions for 2,143 dwellings.

Total for Other sites in Norwich = 2,323.

Representations on other sites in Norwich consist of:

New allocations –

- **GNLP0133-B, Land adjoining the Enterprise Centre at Earlham Hall** - 4 representations were received (1 Support, 2 Objections, 1 Comment). Support was received from the landowner with some suggested alterations. Objections received were from a member of the public regarding loss of public space; and from Historic England with the suggestion that a detailed Heritage Impact Assessment (HIA) is required for the whole campus.
- **GNLP0133-C, Land north of Cow Drive** - 2 representations were received (1 Support, 1 Comment). Support was from the landowner with some suggested alterations.
- **GNLP0133-D, Land between Suffolk Walk and Bluebell Road** - 6 representations were received (1 Support, 3 Objections, 2 Comments). Support was received from the landowner with some suggested alterations. Objections included Historic England's suggestion that a detailed HIA is required for the whole campus. Members of the public also objected, concerned about the further expansion of the University campus, increased student numbers, loss of open space and the impact on biodiversity.
- **GNLP0133-E, Land at the UEA Grounds Depot Site, Bluebell Road** - 20 representations were received (1 Support, 16 Objections, 3 Comments). Support was received from the landowner with some suggested alterations.

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Objections received were from members of the public, political and community groups concerning expansion of the UEA outside of the existing defined boundary into sensitive landscape in the Yare Valley

- **GNLP0282, Land at Constitution Motors, 140-142 Constitution Hill** - 2 representations were received (1 Support, 1 Comment). Support was received from Historic England concerning the reference to locally listed buildings included within policy.
- **GNLP2164, Land west of Eastgate House, Thorpe Road** - 3 representations received (2 Support, 1 Comment). Support was received on behalf of the landowner and from Historic England.

Carried forward allocations –

- **CC13, Land at Lower Clarence Road** - This site was not proposed to be carried forward and was not part of the consultation. However, Network Rail submitted evidence to this consultation requesting its inclusion as a carried forward allocation.
- **CC16, Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way** - 4 representations were received (1 Support, 1 Objection, 2 Comments). Support was received on behalf of the landowner with some suggested amendments. An objection was received from Historic England requiring reference to heritage assets within the policy.
- **R1, Land at The Neatmarket, Hall Road** - 1 comment was received.
- **R2, Ipswich Road Community Hub, 120 Ipswich Road** - 2 representations were received (1 Support, 1 Comment). Support was from the landowner.
- **R7, John Youngs Limited, 24 City Road** - 2 representations were received (1 Support, 1 Comments). Support was received from Historic England for the appropriate reference to heritage assets.
- **R13, Site of former Gas Holder at Gas Hill** - 2 representations were received (1 Objection, 1 Comment). The objection was from Historic England requiring reference to heritage assets as well as the scale, massing and design of the proposed development.
- **R14/15, Land at Kett's Hill and east of Bishop Bridge Road** - 3 representations were received (1 Objection, 2 Comments). The objection was from Historic England requiring reference to heritage assets as well as the scale, massing and design of the proposed development. A comment from a member of the public suggested improved connectivity to the adjacent Kett's Heights open space.
- **R17, Site of former Van Dal Shoes, Dibden Road** - 3 representations were received (1 Support, 2 Comments). Support was received from Historic England for the appropriate reference to heritage assets.

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Comments were received on behalf of the landowner challenging the status of heritage assets, affordable housing viability, housing density and suggesting additional changes to the policy.

- **R18, Site of former Start Rite Factory, 28 Mousehold Lane** - 1 comment was received.
- **R19, Land north of Windmill Road** - 1 comment was received.
- **R20, Land east of Starling Road** - 2 representations were received (1 Support, 1 Comment). Support was from Historic England for the appropriate reference to heritage assets.
- **R29, Two sites at Hurricane Way, Airport Industrial Estate** - No representations were received.
- **R30, Land at Holt Road** - 1 comment was received.
- **R31, Heigham Water Treatment Works, Waterworks Road** - 3 representations were received (2 Support, 1 Objection). Support was received from the landowner and their agent. They advised that the site area needs to be reduced as, following review, some of the land proposed is required for operational use of the Waterworks. The objection received from Historic England requiring additional reference to heritage assets.
- **R33, Site of former Earl of Leicester Public House, 238 Dereham Road** - 1 support representation was received from Historic England for the appropriate reference to heritage assets.
- **R35, Land at Havers Road** - 2 representations were received (1 Objection, 1 Comment). The landowner no longer supports this site for allocation and suggests de-allocation from the plan.
- **R36, Mile Cross Depot** - 2 representations were received (1 Support, 1 Comment). Support was received from Historic England for the appropriate reference to heritage assets.
- **R37, The Norwich Community Hospital site, Bowthorpe Road** - 2 representations were received (1 Objection, 1 Comment). Objection was received from Historic England requiring additional reference to heritage assets to be made within the policy.
- **R42, Land west of Bluebell Road, and north of Daisy Hill Court/Coral Court, Westfield View** - 2 representations were received (1 Support, 1 Comment). Support was received from Historic England for the appropriate reference to heritage assets.
- For sites classed as Reasonable Alternatives or Unreasonable for allocation, please refer to the '[Statement of Consultation Appendix 7b – Norwich](#)'

Colney strategic employment:

97. There were no new or carried forward allocation sites for residential development proposed in Colney, but there were existing permissions for 4 dwellings. Colney

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has two new employment allocations, three carried forward employment allocations and a carried forward country park allocation.

Total housing for Colney = 4

Representations received to Regulation 18C Draft Plan:

New allocations

- **GNLP0331R-B, South of Norwich Research Park extension** - No representations were received.
- **GNLP0331R-C, South of Norwich Research Park extension** - No representations were received.

Carried forward allocations

- **COL1, Land adjacent to Norwich Research Park (NRP)** - 2 representations were received (1 Object, 1 Comment). The objection was from Historic England requiring additional reference to heritage assets to be made within the policy.
- **COL2/GNLP0140-C, Land rear/east of Institute of Food Research (IFR)** - 3 representations were received (1 Support, 1 Object, 1 Comment). Support was received from the landowner. The objection was from Historic England requiring additional reference to heritage assets to be made within the policy.
- **COL3, Redevelopment of existing hospital and science park uses within the Colney Development Boundary** - No representations were received.
- **BAW2, Bawburgh and Colney Lakes** - 7 representations were received (2 Support, 2 Object, 3 Comments). Support was received from a member of the public and the Yare Valley Society. Objection to this allocation has been received with a suggested alternative site for this use.
- For sites classed as Reasonable Alternatives or Unreasonable for allocation, please refer to the 'Statement of Consultation Appendix 7c' ['Urban Fringe exc. Norwich'](#)

Costessey:

98. There were no new or carried forward residential allocations, but existing permissions for 520 dwellings.

Total for Costessey = 520

A 1,000 home contingency site was proposed for Costessey to be brought forward if delivery of housing in GNLP is not meeting target. This contingency policy also

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included a new primary school and sixth form college to address the potential wider population increase in this location. There were three carried forward allocations in Costessey; consisting of two employment allocations at Longwater and a 'Showground' allocation at the Royal Norfolk Showground.

Representations received to Regulation 18C Draft Plan:

Reasonable Alternative/Contingency site

- **GNLP0581, Land off Bawburgh Lane and New Road** - 4 representations were received (1 Support, 1 Object, 2 Comments). Concerns were raised regarding infrastructure and affordable housing viability from a member of public. The site promoter supported allocation of the site and stated that policy compliant development could be delivered.
- **GNLP2043, North of New Road, east of A47** - 3 representations were received (2 Object, 1 Comment). Concerns were raised regarding infrastructure and affordable housing viability. The reliance of the site on the inclusion of GNLP0581 in the plan to be deliverable was highlighted.

Carried forward allocations

- **COS3/GNLPSL2008, Longwater Employment Area** - 1 comment was received.
- **COS4, Redevelopment of existing uses within the Costessey Longwater Development Boundary** - No representations were received.
- **COS5/ GNLP2074, Royal Norfolk Showground** - 1 support representation was received from the site promoter subject to revisions to policy wording.
- For sites classed as Reasonable Alternatives or Unreasonable for allocation, please refer to the 'Statement of Consultation Appendix 9c' ['Urban Fringe exc. Norwich'](#)

Cringleford (plus Keswick employment allocation)

99. No new sites were included, but there was one carried forward allocation for 1,300 homes plus an uplift of 360 homes and existing permissions for a further 61 dwellings. Residential proposals for Keswick are dealt with through the South Norfolk Village Clusters Housing Allocations Plan ([VCHAP](#)), which has now been consulted on.

Total for Cringleford = 1,721

Representations received to Regulation 18C Draft Plan:

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New allocations

- **HOU1-GNLP0307/GNLP0327, Land north and south of the A11** - 10 representations were received (1 Support, 2 Object, 7 Comments). Cringleford Parish Council was generally supportive of the plan for the parish; Historic England supported the policy approach relating to heritage assets. The agent on behalf of the site owner objected to the policy approach.
- **KES2 / GNLP0497, Land west of Ipswich Road, Keswick** - 5 representations were received (1 Support, 2 Object, 2 Comments). Support was received from the site owner. Objections were received from Keswick and Intwood Parish Council, subject to further evidence, and Historic England, who suggested strengthening the policy approach relative to nearby heritage assets.
- For sites classed as Reasonable Alternatives or Unreasonable for allocation, please refer to the '[Statement of Consultation Appendix 9c 'Urban Fringe exc. Norwich'](#)'.

Drayton

100. No new sites were included, but one carried forward allocation for 250 homes and existing permissions for a further 68 dwellings were in the plan.

Total for Drayton = 318

Representations received to Regulation 18C Draft Plan:

Carried forward allocations

- **DRA1, Land east of Cator Road and north of Hall Lane** - 3 representations were received (1 Object, 2 Comments). Historic England suggested strengthening the policy approach relative to nearby heritage assets.

Easton

101. No new sites were included, one carried forward allocation and existing permissions for 1,045 dwellings were in the plan.

Total for Easton = 1,045

Representations received to Regulation 18C Draft Plan:

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Carried forward allocation

- **EAS1, Land south and east of Easton** - 11 representations were received (1 Support, 8 Object, 2 Comments). Support was received from the site promoter. Objection were received from the parish council who considered there should be an alternative use for the land, Historic England who suggested strengthening the approach to heritage assets; and members of the public who considered the proposal to be overdevelopment for the parish.
- For sites classed as Reasonable Alternatives or Unreasonable for allocation, please refer to the 'Statement of Consultation Appendix 9c' [Urban Fringe exc. Norwich](#).

Hellesdon:

102. No new sites were proposed, but two carried forward allocations for residential use providing 1,300 homes and existing permissions for 25 dwellings were in the plan. There are also two allocations for open space in Hellesdon.

Total for Hellesdon = 1,325

Carried forward allocations

- **HEL1, Land at Hospital Grounds, southwest of Drayton Road** - Support for the allocation was received from the landowner.
- **HEL2, Land at the Royal Norwich Golf Club, either side of Drayton High Road** - 2 representations were received (1 Support, 1 Comment). Support for the allocation was received from the site developer.
- **HEL4/GNLP1019, Land northeast of Reepham Road** - 2 representations were received (1 Object, 1 Comment). Concern was raised regarding the location of proposed open space allocation for Hellesdon.
- For sites classed as Reasonable Alternatives or Unreasonable for allocation, please refer to the 'Statement of Consultation Appendix 9c' [Urban Fringe exc. Norwich](#).

Taverham:

103. 1,400 dwellings on one new site, plus permissions for 114 dwellings.

Total for Taverham = 1,514

New allocation

- **GNLP0337, Land between Fir Covert Road and Reepham Road** - 16 representations were received (1 Support, 8 Object, 7 Comments). Support

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was received from the agent on behalf of the landowner. Objections were received from members of the public raising concerns about a number of factors including traffic impacts, community facilities and phasing.

- For sites classed as Reasonable Alternatives or Unreasonable for allocation, please refer to the 'Statement of Consultation Appendix 9c [Urban Fringe exc. Norwich](#)'.

The North East Growth Triangle

104. 1,415 dwellings were included on new sites, plus carried forward allocations and existing permissions for 12,019 dwellings. Proposed Site GNLP0132 Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston includes an allocation for a new secondary school to serve the wider expanding population in the Growth Triangle sustainable urban extension.

Total for The Growth Triangle = 13,434

Rackheath New Allocations

- **GNLP0172, Land to the west of Green Lane West** - 3 representations were received (1 Support, 1 Object, 1 Comment). Support was received from the site promoter requesting a policy update in accordance with the recent planning application. An objection was received from Historic England with suggested changes to the policy wording.
- **GNLP0351, Land at Heathwood Gospel Hall, Green Lane West** - 1 comment was received from Anglian Water referring to water efficient design.

Sprowston - New Allocation

- **GNLP0132, Land off Blue Boar Lane/Salhouse Road, White House Farm** - 9 representations were received (4 Support, 1 Object, 5 Comments). Support was received from Sprowston Town Council, the site developers, the landowner and Historic England. An objection was received from the Woodland Trust over the potential impact on ancient woodland on site.
- For sites classed as Reasonable Alternatives or Unreasonable for allocation, please refer to the '[Statement of Consultation Appendix 9c Urban Fringe exc. Norwich](#)'.

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Thorpe St Andrew

105. No new sites or carried forward allocations were included in the plan, but there were existing permissions for 354 dwellings. Thorpe St Andrew is affected by the Growth Triangle Area Action Plan.

Total for Thorpe St Andrew = 354

For sites classed as Unreasonable for allocation, please refer to the '[Statement of Consultation Appendix 7c Urban Fringe exc. Norwich](#)'.

Trowse:

106. No new sites, but one carried forward allocation for 173 homes and existing permissions for 71 dwellings.

Total for Trowse = 244

Carried forward allocation

- **TROW1, Land on White Horse Lane and to the rear of Charolais Close & Devon Way** – 3 representations were received (1 Object, 2 Comments). An objection was received from Historic England who require strengthening of the policy wording with reference to Trowse Conservation area. The planning agent commented that the allocation figure should reflect the figure in the planning application.
- For sites classed as Unreasonable for allocation, please refer to the '[Statement of Consultation Appendix 9c Urban Fringe exc. Norwich](#)'.
- Note the 71 dwellings commitment referred to here relates to the area of the former May Gurney site within South Norfolk which forms part of the wider cross boundary Deal Ground site GNLP0360, counting this here as a separate entity was an error at Regulation 18c stage which has been remedied in subsequent work.

Other sites in urban area

107. There were no further dwellings on new sites, but existing commitment / permissions for 53 dwellings.

GNLP Regulation 19 Policy and text

108. For the Regulation 19 version of the GNLP, some changes were made to strategic [policy 7.1](#); there were also changes made to site allocations within the NUA. The Regulation 19 draft sites plan proposes allocations for 6,672 new dwellings across Norwich and the urban fringe. This is an increase of 2,277 homes since the regulation 18C draft. 2,000 of these result from the increase from 2,000

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homes to 4,000 homes at the East Norwich Strategic Regeneration Area. For full details of the changes, please refer to the Site Assessment Booklets for [Norwich](#) and the [Urban Fringe](#).

109. The key changes to both the strategic policy and the site allocations are summarised below:

Strategic Policy 7.1

- **City Centre** Paragraph 312 in the supporting text for the city centre now also acknowledges the potential impact of the Covid-19 pandemic with regard to a *“Flexible long-term approach to continuing to promote a vibrant city centre in the context of the decline of high street shopping and the growth of online retailing”*. This was not an issue at the time of writing the regulation 18C draft plan, but now plays a significant part in the future shaping of the city centre and the need for a flexible approach to promote vibrancy and success.
- Paragraph 328 of the supporting text has also been updated. It now states “The policy prioritises vibrancy, activity and diversity of uses in defined retail areas *“outside of the defined primary retail area”* permitting the use of redundant floorspace for other uses, including the re-use of upper floors”. The primary retail area is defined in existing adopted Development Management [policy DM20](#) and the [Main town centre uses and retail frontages SPD](#). This approach seeks to support a well-established core retail area within the city centre which is the most sustainable location for retailing. This policy may potentially be impacted by the change to the use class system including the flexibility of new use class E and the introduction of the new class MA permitted development right which allows a range of commercial uses to convert to housing without needing a planning application (subject to certain conditions being met).
- Acceptance of evening and late night uses throughout the centre has been omitted. This policy approach was raised as a cause for concern by Norwich City Council and Norfolk Constabulary as it was considered that a relaxation of the [late night activity zone](#) could have a detrimental impact on the amenity of residents and uses over a wider area. This approach would also cause difficulties in the policing of late night activity for Norfolk Constabulary. As a result, while a flexible approach has continued to be taken to the early evening economy and leisure uses, the existing adopted policy of restricting late-night activities to specific defined areas has been reverted to in the regulation 19 plan.
- **The Built, Natural and Historic Environment** – An additional bullet point has been added to paragraph five of policy 7.1 relating to Norwich City Centre. This inclusion references *“A programme of improvements to public*

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spaces, as illustrated in a public realm infrastructure plan, will be implemented through a combination of public investment on the highway / publicly owned land and private investment in association with development proposals” to add weight to the approach taken in this area.

- Northern City Centre Strategic Regeneration Area** – A number of representations received to the regulation 18C consultation raised concern regarding the approach to the Northern City Centre Strategic Regeneration Area, particularly focussing on the then pending decision from the secretary of state for the called in application for the Anglia Square which is the key site in this area. Notwithstanding the recommendation from the planning inspector to approve the application, the secretary of state subsequently refused it; therefore policy 7.1 and the site allocation policy for Anglia Square (GNLP0506) required review and updating. The report accompanying the decision gives considerable comfort that medium to high density residential development in this location is appropriate and should be part of the plan. It was considered appropriate to decrease the proposed density at this site from 1,200 to 800, with the expectation for a significant proportion to be affordable tenures. Through consultation, the issue relating to Anglia Square being a large district centre which complements rather than competes with the city centre, was raised. This has been acknowledged within the supporting text for the site allocation policy. Site developers Weston Homes and site owners Columbia Threadneedle submitted a challenge to the decision by local government secretary Robert Jenrick to refuse permission. A date was set for a two-day High Court hearing in May 2021, but the challenge was subsequently withdrawn. It is understood that the same parties are considering their options for a revised approach to developing the site and pre application discussions are taking place.
- East Norwich** – In the time period between the regulation 18C consultation and the regulation 19 draft plan the 2018 based household projections were produced which indicated a higher level of growth in the plan area compared to the 2014 figures. The GNLP therefore identifies further provision to provide the opportunity to meet this higher growth should it materialise. This is consistent with the Government’s overall aim to boost the supply of housing (NPPF para 59).

As part of this increase, the housing figure for East Norwich strategic regeneration area was increased from 2,000 to 4,000 proposed homes; alongside significant new employment opportunities for around 6,000 jobs. This is consistent with a scoping report that was carried out for the site on behalf of Norwich City Council. It also reflects the fact that significant

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progress in joint working has been made to provide the confidence that high density development can be achieved and thus numbers raised with:

- Procurement of the masterplan being completed and early stages of the document are underway;
- The involvement of Homes England in the project and a commitment to funding being in place from key stakeholders;
- Significant additional funding being secured from the Towns Fund to progress the masterplan and acquire land in order to maximise the chances of successful delivery.
- To emphasise the importance of a co-ordinated approach to delivery of these sites, and in support of East Norwich's status in the GNLP as a "strategic regeneration area", the three separate allocations in the Sites Plan have been combined to a single strategic site allocation policy which includes the land in both Norwich and South Norfolk local authority areas.
- Some consultation responses received raised concerns regarding uncertainty of the deliverability of East Norwich. Evidence on delivery will be provided through the master planning process.

110. Site allocations in the Norwich urban area including the fringe parishes:

Norwich City Council Area

- East Norwich strategic regeneration area. The three individual sites referenced R10, GNLP0360 and GNLP3053 have now been combined to one strategic site allocation policy reference GNLP0360/3053/R10. As mentioned earlier in this document, the housing numbers have been increased from 2,000 to 4,000 reflecting the commitment from stakeholders and Homes England to bring these sites forward through the GNLP and master planning as a strategic regeneration area to form a sustainable urban quarter.
- GNLP0133-B, the site area shown for this allocation was incorrect in the regulation 18C allocation. The site has been revised, reference now GNLP0133-BR, to show the area consistent with the boundary set out in the UEA DFS Refresh document which forms part of the evidence base, the revision omits an area of already developed site to the west, but now includes the area to the east connecting to University Drive.
- GNLP0133-D, the site area shown for this allocation was incorrect in the regulation 18C allocation, the site area showed the boundary existing allocation R41 in the adopted local plan. The site has been revised, reference now GNLP0133-DR, to show the area consistent with the boundary set out in the UEA DFS Refresh document which forms part of the evidence base. As a result, the southern boundary remains the same and

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the site extends further to the north west connecting into the existing buildings on campus.

- GNLP0133-E, following objections to the development of this site, this has been allocated a 'strategic reserve' for UEA, only to be considered for development once all other site allocations and development opportunities within campus have been delivered.
- GNLP0409R Site at Whitefriars/Barrack Street has been divided into two separate site allocation policies (GNLP0409AR – Whitefriars, and GNLP0409BR land south of Barrack Street). This is to reflect the consent granted and the progress of phase one of the development on the site area now covered by GNLP0409AR which enables emerging requirements on site GNLP0409BR to be dealt with separately.
- GNLP0506 Land at and adjoining Anglia Square, as mentioned earlier in this document, the site was subject to a called in planning application which has now been determined as a refusal of permission. The proposed site allocation policy was also subject to a number of objections. As a result, the housing numbers have accordingly been reduced from 1,200 to 800 in this policy
- GNLP1061R – Norwich airport site 4 was not included for allocation in the Regulation 18C draft of the plan. This site has been introduced for allocation in the Regulation 19 draft plan for aviation related employment and aviation educational uses. This site provides a unique opportunity for delivery of such uses in the plan area. This site was previously identified in policy 6 of the strategy as a strategic employment area; it was felt necessary to have an allocation for it in the site allocations plan which would be more consistent and joined up.
- GNLP2159 Land at 84-120 Ber Street, 147-153 Ber Street and Mariners Lane Car Park. This site allocation policy consisted of two parcels of land in the same ownership on opposite sides of Ber Street. The larger of these two areas is no longer supported by the landowner and has been withdrawn from consideration for allocation. The landowner supports the continued allocation of the smaller parcel of land on the west of Ber Street which is an existing allocation in the adopted local plan reference CC2 147-153 Ber Street. CC2 is included as a carried forward allocation in the regulation 19 draft plan.
- Existing allocations CC13 (Lower Clarence Road) and CC15 (Royal Mail Depot, Thorpe Road) were previously allocated in the Norwich Sites Plan, but not included in the GNLP site allocations. However, they have been reintroduced as carried forward allocations in the regulation 19 draft of the plan following receipt of support from both landowners for the inclusion of the sites in the plan.

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- CC18/CC19 – The site area for this carried forward allocation has been revised. The regulation 18C draft mistakenly included land to the south which was not in the same ownership.
- Carried forward allocation reference R30 has been reduced in size to omit land at the north of the allocated site which is undergoing a land ownership dispute.
- Carried forward allocation R31 Heigham Water Treatment Works, Waterworks Road, has been reduced in size following instruction from the landowner's agent that some of the site is required for water treatment.
- Carried forward allocation R35 Land at Havers Road has been withdrawn by the landowners and is no longer supported for allocation. The site is considered by the landowner to be undeliverable for residential development within the plan period. It is to be retained in its current employment use.

Fringe Parishes

111. Colney

- One additional site allocation – GNLP0253 (Colney Hall) has been allocated for older people's accommodation (200 units). The site was previously identified as 'unreasonable'. The status of this site has been revised following additional information submitted relating to the unique research-based approach relating to the UEA and NRP.

112. Costessey

- Site GNLP2043/0581 (North of New Road, east of A47). This site was proposed as a potential contingency housing allocation for 1,000 homes in the regulation 18C draft of the plan. The regulation 19 draft allocates this as a contingency site to be brought forward if there are three years of under delivery in the plan's housing. Following further evidence, the site is expected to accommodate approximately 800 homes, along with educational provision and a local centre.

113. Cringleford

- Site allocation policy GNLP0307/0327 - Land north and south of the A11 the uplift figure for this allocation has been increased from 360 to 410 homes. This results in a total allocation of 1,710 homes on this site. There are no additional proposed site allocations in Cringleford since regulation 18C.

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114. Drayton

- Site allocation no change since regulation 18C, no new allocations.

115. Easton

- There are no new allocations in Easton. However, a Department for Education Special Educational Needs School has recently gained planning permission on part of the existing EAS1 allocation. Therefore, a modification could be considered for this site to reduce the overall housing numbers from 1,044 to 954 and to include the school site as part of the allocation (see also appendix 5 of the Growth Options topic paper).

116. Hellesdon

- No change since regulation 18C, no new allocations.

117. Other sites in Norwich

- No change since regulation 18C

118. The Growth Triangle

- Allocation increase from 1,415 to 1,420

119. Taverham

- Allocation GNLP0337R (Land between Fir Covert Road and Reepham Road) updated from 1,400 homes to 1,405 homes. One additional new allocation GNLP0159R (Land off Beech Avenue) housing allocation for 12 units.

120. Thorpe St. Andrew

- No change since regulation 18C, no new allocations.

121. Appendix 6 provides further details on the considerations concerning the selection of the proposed sites of 200 homes plus in the fringe in the submitted plan.

122. The distribution of new housing in the NUA at the regulation 19 stage, along with updated delivery/commitment figures, is illustrated in the map in Appendix 2 and in the table below:

Part of Norwich urban area	Existing deliverable commitment (including uplift and delivery 2018/19 - 19/20)	New allocations	Total deliverable housing commitment 2018-2038
(City Centre) Northern City Centre Strategic Regeneration Area	1,533	25	1,558
(City Centre) Other city centre sites	2,724	200	2,924
City centre total	4,257	225	4,482
East Norwich Strategic Regeneration Area	770	3,230	4,000
Colney	4	200	204
Costessey	529	0 ¹	529
Cringleford*	1,771	0	1,771
Drayton	404	0	404
Easton*	1,046	0	1,046
Hellesdon*	1,351	0	1,351
Other sites in Norwich	2,160	180	2,340

¹ An 800-home contingency site at Costessey will be brought forward if delivery of housing in the GNLP area does not meet local plan targets. It is not included in these figures

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Three Score, Bowthorpe*	908	0	908
Taverham*	121	1,417	1,538
The Growth Triangle	12,087	1,420	13,507
Thorpe St. Andrew	386	0	386
Trowse	181	0	181
Other sites in the urban area	44	0	44
Elsewhere in urban area total	20,992	3,217	24,209
Norwich urban area total	26,019	6,672	32,691

* denotes strategic urban extensions

Jobs

123. Employment land in the NUA is provided through committed sites, as the Employment, Town Centre and Retail Study, updated in 2020, indicates an over-supply of employment land over the Greater Norwich area (see Employment Topic Paper). Previously allocated employment land is carried forward to provide choice and flexibility for the economy to grow and provide local employment opportunities. The distribution of sites is shown below:

Part of Norwich urban area	Existing undeveloped employment allocations (hectares, April 2018)	New Allocations (hectares)	Total undeveloped employment allocations (hectares)
Norwich city centre with a focus on expansion of office, digital and creative industries, retail and leisure provision	30.8	0	30.8
The Norwich Airport area and in particular: <ul style="list-style-type: none"> a new site on the northern edge of the airport accessed directly from the Broadland Northway of 	35	46.5	81.5

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46.5ha and focussed on aviation related activities; and <ul style="list-style-type: none"> a site of around 35ha at the A140/Broadland Northway junction and focussed on uses benefiting from an airport location 			
Longwater - consolidation of activity through intensification of employment uses and completion of the existing allocation	12	0	12
Rackheath (for general employment uses)	25.6	0	25.6
The complex of general business parks at Thorpe St Andrew (Broadland Business Park, St Andrews Business Park and Broadland Gate);	33.1	0	33.1
Norwich Research Park including the Norfolk and Norwich University Hospital and the University of East Anglia; providing for significant expansion of health, higher education and science park activity	32.7	6.9	39.6
The Food Enterprise Park at Easton/Honingham supporting the agri-food sector	18.7	0	18.7
Hellesdon	1.4	0	1.4
Taverham	5.6	0	5.6
Harford Bridge	4	0	4
Norwich urban area total	198.9	53.4	252.3

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Regulation 19 Publication Stage – February to March 2021

124. During the publication period, there were 46 representations from 29 respondents about policy 7.1 (14 Support, 32 Object) The main issues raised were:

Summary of main issues arising from the Regulation 19 Consultation

General

- Historic England state that the GNLP should include a policy for taller buildings and the skyline;
- Figures in the Housing table should be identified as ‘minimum total’ not ‘total’.
- Smaller employment sites should be allocated in key locations to address the impact of housing growth and
- Breckland DC expressed concerns over the impact of cumulative growth.

The City Centre

The Northern City Centre

- The agent for the developer of Anglia Square (GNLP0506) suggests a number of amendments to align policy GNLP0506 with emerging proposals.
- Clarification is needed that the objective to preserve office accommodation, potentially via an Article 4 Direction, would not apply to Anglia Square, where redevelopment of redundant offices for homes is welcomed.
- Historic England continues to have significant concerns regarding the approach to development at Anglia Square, including lack of a Heritage Impact Assessment.
- The Northern City Centre Strategic Regeneration Area has a lot of uncertainty and potential for delay regarding the Anglia Square allocation.

Other elements of city centre policy

- Policy should include protection of valued cultural facilities (para. 92 NPPF)
- Policy 7.1 is restrictive and not in accordance with NPPF and the revised Use Class Order. Greater flexibility is essential to enable vibrancy and viability. In store retail is declining exacerbated by the pandemic; leisure uses should not be restricted to a defined leisure area.
- Both support for and objection to the deletion of the bullet point regarding landmark buildings at gateways to the city centre.

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East Norwich Strategic Regeneration Area

- Historic England have raised concerns:
 - Regarding the impact on Carrow Abbey/Carrow Priory;
 - Over the capacity of the East Norwich sites- detailed HIA is required to inform the development / allocation potential of the sites;
- The Broads Authority suggest some modifications re. navigation, mapping and the combined approach to the East Norwich sites;
- The area is a long-term prospect with a high level of constraints and a history of non-delivery. Evidence does not suggest that the sites will come forward.
- The area includes a County Wildlife Site. Clear policy is required to assess the acceptability of proposals that will affect it.
- Covid-19 has changed home buyers' priorities (seek outdoor space + rural locations). Question whether demand exists for 4,000 dwellings in the area proposed for flatted/high density development.

Elsewhere in the urban area

- Over reliance on the Growth Triangle commitment for delivery within the plan period;
- Thorpe St Andrew has no new allocations despite availability of sites;
- The parish of Honingham has been inappropriately classified as 'Urban Fringe' in association with Easton (Honingham is a rural village).

Distribution and delivery of growth

- The GNLP is overly reliant upon sites in the NUA, risking market saturation and slow delivery rates.
- Numerous allocations (75%) have been carried forward from previous local plans and have a track record of not delivering, with no promoter or developer on board. Some have a reliance upon public sector funding + public sector intervention to remedy market failure;
- Historic England have concerns regarding housing figures - Heritage Impact Assessments are required to test and inform the capacity of sites;
- Representations suggested some solutions to the issues raised regarding distribution and delivery of growth:
 - New settlement/s;
 - More rural development;
 - Insufficient account has been taken of the decrease in retailing in Norwich, which provides for significant potential redevelopment to housing.

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Contingency

- The contingency site at Costessey is likely to be ineffective due to constraints. Multiple contingency sites should have been identified in a variety of locations and the trigger mechanism should be earlier than three years;
- There is already saturation of allocation sites in the NUA, the contingency site compounds the issue. Under delivery would be better addressed through a more robust evidence-based supply and monitoring.

125. During the publication period there were 196 representations about NUA section of 'Part 2 The Sites' plan (78 Support, 118 Object) from 61 respondents.

- 119 of the representation from 25 respondents relate to sites in Norwich City Council Local Authority Area (50 Support, 69 Object);
- 72 of the representations from 40 respondents relate to sites in the fringe parishes (27 Support, 45 Object).
- 5 of the representations from 5 respondents relate to the Norwich and Urban Fringe Assessment Booklets (1 Support, 4 Object)

Summary of representations received to the Regulation 19 Consultation

General Comments

- Cllr Lesley Grahame and Green party representations suggest that: "Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target" for a number of sites within Norwich.

Norwich City Council Area

Carried Forward Allocations (Norwich)

Policy CC2, 10-14 Ber Street

- Historic England suggest key listed buildings affected by the development should be referenced. Policy wording should also reference 'Area of Main Archaeological Interest'

Policy CC4a, Rose Lane and Mountergate, land at Mountergate West

- Anglian Water suggest additional policy criteria on existing surface water sewer on site.

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- Cllr Lesley Grahame suggests that Rose Lane community garden should be a green space allocation. Employment welcome but must be compatible with high density residential.

Policy CC4b, Rose Lane and Mountergate, land at Mountergate East

- The landowner's agent objects to the policy approach to the privately owned designated open space and the approach to landmark buildings. They also seek amendment to the uses on site to include a care home and remove educational facilities;
- Broads Authority request inclusion of early consultation with them in supporting text.

Policy CC7, King Street/Hobrough Lane includes 125-129 King Street and 131-133 King Street and Hoburgh Lane

- Suggestion from landowner that policy should include criteria for viability appraisal at application stage due to difficult site constraints. Also requests acknowledgement of Norwich City Council's role in providing riverside access.
- Historic England require archaeological assessment to be included in policy criteria.
- Cllr Lesley Grahame suggests that the development must protect existing trees on site and provide proposed river access and walk

Policy CC8, King Street, King Street Stores

- Historic England suggest additional policy criteria requiring trial trenching prior to development.
- Policy intention to recreate historic streetscape should be replaced with priority to retrain the mature trees lining the boundary of the site (note that trees have TPOs).
- Cllr Lesley Grahame, Norwich Green Party and Historic England support retention of locally listed buildings on site.

Policy CC10, Land at Garden Street and Rouen Road

- Policy criterion 1 and 2 are exactly the same, the repeated second point should be deleted.

Policy CC11, Argyle Street

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- Historic England suggest Archaeological Investigation requirement should be included in the policy criterion

Policy CC15, Lower Clarence Road, car park

- Policy should list nearby statutory listed buildings.
- Existing trees and hedges should be retained.
- Clause 2 is unclear regarding what is meant by ‘built frontages’*

Policy CC16, Kerrison Road: Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way

- Site promoter does not support provision of a public transport interchange on site and a public transport strategy for the wider east Norwich strategic regeneration area, but would support wording change to: *“Facilitate potential for enhanced pedestrian and public transport access to the wider Norwich strategic regeneration area”*.
- Cllr Lesley Grahame would like to add 2 further points – re-opening of train halt at Trowse + provision of open amenity space.
- Clarification required relating to numbers as there are consents on this site.
- Policy relating to river frontage relates to elements that have now commenced on site.
- Broads Authority suggest early engagement with them is added to supporting text.
- Approach to car free/low car housing should be consistent throughout relevant allocation policies.

Policies CC17 a and CC17b, Land at Whitefriars, Barrack Street

- Sites referenced CC17a and CC17b are not being carried forward under these boundaries/policies. They have been replaced with GNLP0409AR and GNLP0409BR. It is assumed that the representation made here relates to the new site references: *“This is acceptable and welcomed, subject to social housing, environmental standards and traffic neutrality that make the plan consistent with climate and planning legislation”*

Policy CC18 (CC19), Oak Street and Sussex Street

- Historic England suggest reference to the Area of Main Archaeological Interest and requirement to produce an archaeological assessment are included in policy criterion.

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Policy CC24, Bethel Street, land rear of City Hall

- Historic England suggest reference to the Area of Main Archaeological Interest

Policy CC30, Westwick Street car park

- Historic England - need for a policy requirement for archaeological assessment.

Policy R1, The Neatmarket, Hall Road

- Promoting agent suggests greater flexibility of use classes in spirit of new class E; also, that wording relating to junction improvements should revert to that in existing policy.

Policy R13, Gas Hill, Site of former Gas Holder

- Norwich Green Party and Cllr Lesley Grahame advocate retaining this site as woodland for biodiversity and climate objectives given the acknowledged constraints of the site.

Policy R17, Dibden Road, Van Dal Shoes and car park

- The site promoter objects to the criterion relating to retention/reuse of existing buildings. Wording requiring 'high quality, locally distinctive design' repeats requirements of strategic policies and places undue emphasis on this site which is misleading.

New Allocations (Norwich)

Policy GNLP0068, Duke Street, land adjoining Premier Inn and River Wensum

- Historic England suggest inclusion of reference to Area of Main Archaeological Interest.

Policy GNLP0133BR, Land adjoining the Enterprise Centre Earlham Hall (walled garden and nursery)

- Historic England suggest a Heritage Impact Assessment is required for the whole campus.

Policy GNLP0133C, Bluebell Road (UEA, land north of Cow Drive)

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- Anglian Water - existing water mains on site, suggest inclusion in policy

Policy GNLP0133DR, Land between Suffolk Walk and Bluebell Road

- Public objection to loss amenity open space and biodiversity. Impact on Yare Valley and wildlife. Impact of increased student numbers on local infrastructure and amenities.
- Historic England suggest a Heritage Impact Assessment (HIA) is required for whole campus.
- Comprehensive objection from Yare Valley society – allocation is contrary to national and local policies, the area is protected by the current local plan; Yare Valley is a priority Green Infrastructure project in the Greater Norwich Infrastructure Plan.

Policy GNLP0133E, UEA Grounds Depot

- Public objection to loss amenity open space and biodiversity. Impact on Yare Valley and wildlife. Impact of increased student numbers on local infrastructure and amenities. Suggest allocation removes building works in this area to protect green corridor of the Yare Valley.
- Support from Environment Agency as development is sited in Flood Zone 1 area of allocation site and is in accordance with SFRA and previous EA comments.
- Support from site promoter subject to suggested changes to be more flexible regarding scale and massing of allowed development and difficulty in achieving cycle and pedestrian connections to sites outside of their ownership.
- Comprehensive/substantial objection from Yare Valley society – allocation is contrary to national and local policies as well as inconsistent with strategic policies of the GNLP; the area is protected by the current local plan; Yare Valley is a priority Green Infrastructure project in the Greater Norwich Infrastructure Plan.

Policy GNLP0401, Duke Street, former EEB site (Dukes' Wharf)

- Minor typographical/wording suggestions from Broads Authority.
- Support from Environment Agency and Historic England.
- Additional criteria relating to existing water main suggested by Anglian Water

Policy GNLP0409AR, Land at Whitefriars

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- Support from Environment Agency – ‘text does not acknowledge that the site is in future Flood Zone 3a but flood risk issues should be able to be addressed on a site specific basis’.
- Additional criteria relating to existing surface water sewer suggested by Anglian Water.
- Suggested revisions to/re-ordering of policy wording by Historic England. Suggest inclusion of reference to Area of Main Archaeological Interest. Suggest a Heritage Impact Assessment is required for this site

Policy GNLP0409BR, Land at Barrack Street

- Additional criteria relating to existing surface water sewer suggested by Anglian Water.
- Suggested minor revision to policy wording by Historic England. Suggest a Heritage Impact Assessment is required for this site.
- Objection from Site promoter - Mixed use requirement is not evidenced to be viable or deliverable, the allocation is inconsistent with strategic policies. The inconsistency of parking policies between local authority areas throughout the plan undermines the attractiveness of City sites for business/employment uses. Suggestion that the site boundary is not correct (however, boundary is in accordance with site promoter’s reg 18C representation). Sustainability Appraisal is misleading as it refers to expired consents for this site. Site promoter has provided suggested alternative allocation policy wording

Policy GNLP0451, Queens Road and Surrey Street, land east of Sentinel House

- Objection from site promoter on behalf of developer – the site has extant consent for student accommodation due to commence on site summer 2021. The site allocation policy is considered unsound for three reasons: i) Unjustified and ineffective heritage requirements. ii) Unjustified and ineffective approach to affordable housing. iii) Unjustified and ineffective approach to landscaping and biodiversity. (Suggested revision to policy wording to make sound provided by agent)
- Minor alterations to wording and reference to the Area of Main Archaeological Interest into the policy suggested by Historic England

Policy GNLP0506, Anglia Square

- Agent on behalf of site developer – suggests that the site boundary should be extended to include the area underneath the flyover. A comprehensive

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suggestion for revised supporting text has been provided by the agent. The agent has also suggested a comprehensive review of the allocation policy wording.

- Additional criteria relating to existing water mains, foul and surface water sewers suggested by Anglian Water.
- Significant concerns raised by Historic England relating to scale height and density. Suggestion that the allocation figure should be reduced from the current 800 to 600. Aside from housing, the permissible extent of other development on site is unclear. A Heritage Impact Assessment (HIA) should be prepared for the site. Suggested reinstatement of historic street pattern and suggested wording revision provided to policy.
- Comprehensive objection from Norwich Green Party – consider the policy repeats the same elements which lead to a lack of public support for the rejected scheme. 800 homes should be a maximum and this figure should include any potential student accommodation. Objection raises issues relating to: existing artistic community, provision of multi-storey car park/carbon emissions, more ambitious energy efficient design, landmark building. Proposal should reflect medieval street pattern, reference green open space and high-quality landscaping; low car environment.

Policy GNLP1061R, Land north of Norwich International Airport, Imperial Park

- Historic England suggest reference to nearby Horsham St Faith Conservation area and heritage assets is made within policy.
- Site promoter on behalf of site owner supports an allocation subject to changes to policy requirements. Site boundary to be extended to include land at Petans, policy needs to provide a mixture of aviation and non-aviation uses in line with endorsed airport masterplan (current policy wording is inconsistent and overly restrictive). Ancillary uses should also be allowed to make site more sustainable.

Policy GNLP2114, Muspole Street, St Georges Works

- Objection from site promoter. 110 homes, 5,000 sqm offices/managed workspace and potentially other ancillary uses is not achievable. Revised wording suggested.

Policy GNLP3054, Duke Street, St Marys Works

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- Historic England suggest that a detailed HIA is prepared for this site. Minor amendment of policy wording and reference to the Area of Main Archaeological Interest into the policy suggested.
- Site promoter objection – number of homes should not be ‘minimum’ but ‘in the region or order of’. The requirement to justify the housing type against a local community need is not considered to be justified or consistent with national policy. Suggestion that policy is amended to allow full or part retention of the locally listed building. Suggested revision to policy wording provided in representation.

East Norwich Strategic Regeneration Area

- Protecting wildlife and heritage sites, and water storage for the event of flooding will be critical the success or otherwise of the project.
- Opportunity to provide pedestrian and cycle links to Whitlingham enabling reduced carbon emissions through sustainable modes of transport.
- Introduction of a road bridge to Yarmouth Road would change the quiet suburban character of Thorpe, add noise and pollution, reduce air quality. It would threaten marshland biodiversity and water storage capacity, and reduce the amenity of the river Wensum, thereby undermining the River Wensum Strategy and conservation areas.
- Resident consultation is vital in the design and development of this new site.
- Low car development would reduce harm. Energy efficiency standards should reflect the best aspirations.
- Suggest opening former rail halt at Trowse to serve ENSRA and County Hall + bus connections to UEA, NRP and N+N Hospital.
- Potential impact of ENSRA on Whitlingham Country Park should be mitigated by extending the country park to cater for increased demands.
- The area is prone to flooding and development will need to mitigate against this risk.
- Any energy generation should be from recognisably clean sources (not combustion).
- Policy map should show area of utilities site in the Broads Local Authority area (allocated in their adopted local plan)
- The functioning of existing Carrow Yacht Club should be protected in the policy.
- The presence of County Wildlife Site does not preclude development, and this should be made clear in the allocation policy.
- Environment Agency “Whilst we are able to find this allocation sound, there is no mention of the need to preclude development on a large part of GNLP0360 due to being Flood Zone 3b, and there is no mention on the need

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to not increase flood risk elsewhere and therefore provide flood storage. There is lots of mention of ‘flood resilient construction’ when this tends to mean the buildings can recover from a flood, while we would require buildings to have raised floor levels to prevent them flooding in the first place. It is however possible that perhaps this is just differing terminology and the intention is the same as us. It is positive that the SFRA Site Summary Table includes lots of detail as to what is required to develop the site, so therefore this information should be covered here.”

- Historic England raise significant concern with the proposed number of dwellings allocated which may have a harmful impact on the historic environment (there are numerous heritage assets on this site). Strongly advise that a HIA is prepared for ENSRA sites. Some suggested amendment to wording has been provided by Historic England.
- Dentons suggests that the viability and therefore deliverability is not sufficiently evidenced. This should not be deferred to an SPD stage. The requirements of the ENSRA SPD have not been adequately established in policy 7.1 and site allocation GNLP0360/3053/R10. This relates to the scope, timing and scale of the master planning process and whether elements of it are Justified and will be Effective.
- Rosconn Group – No evidence that ENSRA will realistically yield this level of development in GNLP plan period. Significant Infrastructure requirements and flood risk indicates that site is more appropriate for long term than medium-long term. L2SFRA indicates areas of land in floodplain likely to affect amount of land available for development and mitigation needed. But no sequential test evidence is provided to demonstrate selection of these sites instead of sites elsewhere.

Urban Fringe

- Historic England - The changes made to Site Policies in view of comments made at Reg 18 are welcomed. Continue to advise that Heritage Impact Assessments (HIAs) should be prepared in advance of the EiP. This applies to Colney Hall GNLP0253 in particular.
- Costessey - COS3/GNLPSL2008 (Overwood Lane) changes to Settlement limit suggested.
- KES2 employment site has the capacity to deliver in the region of 30, 000 sq. meters of employment floorspace so expansion suggested.
- Further evidence of Housing Need is required to justify increase in numbers at Cringleford in relation to NP and site allocated with uplift.
- Showground, Costessey COS5/GNLP2074
- amendments suggested to include small restaurants, café, PH, etc.

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- retail and leisure will add greatly to the over stretched local road network and contradicts Policy 2 of Neighbourhood Plan.
- The site at Farmland Road, Costessey, offers an appropriate opportunity to deliver growth in a manner that is appropriate.
- Drayton Site DRA1 - Carried Forward Sites / Planning permissions / GNLP Policy Requirements require update to reflect permissions.
- Drayton – GNLP0290 (unallocated) Recommended changes to Policy 5 to enable viability of care homes, and Policy 3- as it does not specifically refer to CWS - proposed amended text to set out a clear benefit a development can provide, such as a 10% biodiversity net gain.
- Taverham site 0337R should include Police Station Norfolk Constabulary / NPS (DTC)
- Code Developments – (Horsford) on behalf of Drayton Farms - The plan has failed to justify through proportionate and consistent evidence the selection of allocated site GNLP0337(Taverham), identified contingency site GNLP2043/0581 and the rejection of Reasonable Alternative sites GNLP0332R and GNLP0334R (Hellesdon north) as site assessment is not transparent. Legal opinion obtained. Additional medium sized site allocations should be identified in order to reduce the over-reliance of the plan's supply of housing on large-scale development sites. Site HEL4/GNLP1019 allocated for Open Space should be deleted and considered for housing under sites GNLP0332R and GNLP0334R instead.
- Code Developments – Hellesdon (on behalf of Jarrolds) – objects to Site Assessment and outcome of not allocating clients' Site GNLP2173 – for Housing. There are inconsistencies in Site Assessment and SA Report approach taken between HEL1 'carried fwd sites' and 'new sites' GNLP2173.
- Easton PC – DTC – Easton EAS 1: - objection to the additional 90 dwellings on the last parcel of allocated land, to the east of Easton Gymnastics Club.
- Lanpro – Rackheath – GNLP2166 should be allocated for 200 dwellings as unlikely to impact to Rackheath Hall unlike GNLP0132
- La Ronde Wright - Sprowston – New site promoted - west of Blue Boar Lane near garden centre - unallocated in the GT AAP
- Bidwells Sprowston - GNLP0132 – Request flexibility on affordable housing requirement due to infrastructure requirements for High School and additional requirements by AW for pumping station to serve the surrounding area.
- Sprowston - Request that GNLP3024 is allocated for mix and community uses to complement nearby housing developments.
- Norfolk Wildlife Trust – Sprowston - recommended text modification to site GNLP0132 adjacent to Ancient Woodland -GI requirement

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- The SFRAs done are defective as maps have not been followed through properly. With regards to the NEGT, massive development has been approved within a massive flood plain that is close to sea level and where tidal effects are observable for miles.
- Broads Authority- recommended text for clarity for Policy 3 with respects to the built and historic environment. heritage impact assessment is required by government guidance for any application that affects any heritage asset or their setting.

Norwich and Urban Fringe Site Assessment Booklets

- Site GNLP0478 (Land east of Green Lane West) has not been allocated due to Highways related reasons – it is suggested that an engineered solution could be found and that the site should be allocated.
- Land allocated at Colney Hall is misleading to allocate the entire area as it contains historic parkland that should not be developed, and which is outside of the development boundary.
- Cringleford Parish Council challenges the GNLP's Regulation 19 proposals for the Parish of Cringleford. The number of homes allocated does not respect the figure of 1,200 in the adopted Cringleford Neighbourhood Plan. The GNLP has ignored comments of the Parish made under Regulation 18 and is proposing a 32% increase over planned residential dwellings without providing evidence of need for the additional housing in Cringleford. Challenge that the plan meets the criteria of compliance with duty to cooperate (disregard of neighbourhood plan and parish council comments to previous consultations).
- Historic England suggest site assessments appear to be lacking. The assessments do not follow the 5-step methodology set out in HE advice note 3. They do not properly consider the significance of the heritage assets, the impact of development upon the significance of those assets and do not consider mitigation and enhancement. This is of particular concern for sites where additional HIA was recommended at reg 18 but has not been carried out. Concerns regarding the indicative capacity of a number of sites. HE considers that Norwich's historic character is under pressure. we consider that it is essential evidence base document is prepared outlining the site capacities and the assumptions that have been made in reaching these figures, particularly for the sites in the City.

126. For full details of representations, council response, and any proposed changes to the plan; please refer to the statement of consultations in the evidence base:

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- [Part 1 - The strategy](#) (relevant to policy 7.1)
- [Part 2 - The sites](#) (for allocations in the NUA)

127. Following the Regulation 19 consultation, the following actions have been taken relative to the NUA:

- Heritage statements have been produced for:
 - [GNLP0133BR – Land adjacent to the Enterprise Centre \(UEA\)](#)
 - [GNLP0133DR Land between Suffolk Walk and Bluebell Road \(UEA\)](#)
 - [GNLP0253 Colney Hall](#)
 - [GNLP0360 3053 R10 East Norwich](#)
 - [GNLP0409AR Whitefriars](#)
 - [GNLP0409BR Barrack Street](#)
 - [GNLP0506 Anglia Square](#)
 - [GNLP3054 St Mary's Works](#)
 - [GNLP2043 0581 Costessey Contingency site](#)
- Two minor amendments to correct grammar proposed to Part 1 The strategy, Policy 7.1. Please see the schedule in Appendix 3.
- Thirty-three minor amendments to Part 2 The Sites, Norwich. Please see the schedule in Appendix 4.
- Four minor amendments to Part 2 The Sites, The Urban Fringe. Please see the schedule in Appendix 5.

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Conclusion

128. Policy 7.1 seeks to maximise the potential for housing and employment growth in the most sustainable location in Greater Norwich, in and around the urban area. To be used in tandem with emerging policies 2 and 3 of the GNLP concerning design and environmental protection, as well as existing adopted development management policies, it also aims to ensure that the historic and environmental assets of the area are protected and enhanced, whilst at the same time allowing for sustainable growth.
129. The flexible approach taken to Norwich city centre seeks to support its continued vibrancy, addressing the challenges of loss of office space over recent years and the impacts of the Covid-19 pandemic and economic change on the retail and hospitality/leisure sectors. Development seeks to make the best use of previously developed brownfield land redeveloped at densities appropriate to the rich heritage environment, often for mixed use development to promote employment and diversity throughout the area.
130. The remainder of the urban area is already subject to a large proportion of development in the plan area. Whilst many parishes are not proposed for new allocations, they are contributing to development through existing commitments. New allocations in the urban fringe as part of the GNLP are primarily in the form of urban extensions on large strategic allocation sites. Such large-scale development provides significant quantities of housing and important supporting additional infrastructure and employment.
131. The number of dwellings on newly allocated sites in the NUA (6,672) is broadly in line with the range identified through the Growth Options with an additional uplift to acknowledge the direction of travel of more recent household projections and the national approach to addressing housing need through a substantial increase in housing delivery.
132. The total provision in the plan for NUA is 32,691 homes, including carried forward allocations, uplift on allocated sites and other deliverable commitment.

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This equates to 66% of the proposed housing growth across Greater Norwich. In 2018, around 57% of existing homes in Greater Norwich were in NUA. The overall growth at this level of the hierarchy is proportionate and in accordance with the outcome of the growth options to focus development in and around the city.

133. The plan also provides for 252.3 hectares of employment/commercial land and related infrastructure, to support local communities and provide sustainable choices for travel and local employment.

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Appendices

Appendix 1: Full text of policy 7.1

Appendix 2: Map of Norwich Urban Area housing growth

Appendix 3: Schedule of Minor Modifications to the GNLP Part 1 The Strategy, Policy 7.1

Appendix 4: Schedule of Minor Modifications to the GNLP Part 2 The Sites, Norwich

Appendix 5: Schedule of Minor Modifications to the GNLP Part 2 The Sites, The Urban Fringe

Appendix 6: Large Urban Fringe Housing Sites

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Appendix 1: Policy 7.1

POLICY 7.1 – The Norwich Urban Area including the fringe parishes

Norwich and the fringe parishes² will be the area's major focus for jobs, homes and service development to enhance its regional centre role and to promote major regeneration, the growth of strategic and smaller scale extensions and redevelopment to support neighbourhood renewal. The area will provide 30,500 additional homes and sites for a significant increase in jobs, including around 257 hectares of undeveloped land allocated for employment use.

To achieve this, development sites will be focussed in the city centre, in strategic regeneration areas in East Norwich and the Northern City Centre and at strategic urban extensions³ in the north-east and west as well as other locations across the urban area as follows:

Housing

Part of Norwich Urban area	Existing deliverable commitment (including uplift + delivery 2018/19)	New allocations	Total deliverable housing commitment 2018 - 2038
Northern City Centre Strategic Regeneration Area	1,533	25	1,558
Other city centre sites	2,724	200	2,924

² The Norwich fringe is 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

³ Strategic urban extensions/strategic housing growth locations will each provide over 1,000 new homes from 2018 to 2038

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City centre total	4,257	225	4,482
East Norwich Strategic Regeneration Area	770	3,230	4,000
Colney	4	200	204
Costessey	529	0 ⁴	529
Cringleford*	1,771	0	1,771
Easton*	1,046	0	1,046
Hellesdon*	1,351	0	1,351
Other sites in Norwich	2,160	180	2,340
Three Score, Bowthorpe*	908	0	908
Taverham*	121	1,417	1,538
The Growth Triangle*	12,087	1,420	13,507
Thorpe St Andrew	386	0	386
Trowse	181	0	181
Other sites in urban area	44	0	44
Elsewhere in the urban area total	20,992	3,217	24,209
Norwich Urban Area Total	26,019	6,672	32,691

* denotes strategic urban extensions

⁴ An 800-home contingency site at Costessey will be brought forward if delivery of housing in the GNLP area does not meet local plan targets. It is not included in these figures (see also the Site allocations plan).

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Employment

Part of Norwich Urban Area	Existing undeveloped employment allocations (hectares, April 2018)	New allocations (hectares)	Total undeveloped Employment allocations (hectares)
See policies 1 and 6 for the strategic sites in the Norwich urban area	187.9	46.9	245.8
Hellesdon	1.4	0	1.4
Taverham	5.6	0	5.6
Harford Bridge	4	0	4
Norwich urban area total	198.9	46.9	256.8

Other small-scale housing and employment development will be acceptable in principle elsewhere in the Norwich urban area subject to meeting other policies in the development plan.

The City Centre

Norwich city centre's strategic role as key driver for the Greater Norwich economy will be strengthened. Development in the city centre will provide a high density mix of employment, housing, leisure and other uses. Intensification of uses within the city centre to strengthen its role as a main regional employment, retail, cultural and visitor centre, providing a vibrant and diverse experience for all, will be supported.

Comprehensive redevelopment of the large district centre at Anglia Square and surrounding vacant land will provide a viable, high density, housing-led mixed-use development including retailing, employment, community and leisure facilities. The redevelopment of Anglia Square will be the catalyst for change in the wider Northern City Centre strategic regeneration area identified on the Key Diagram and defined in map 9.

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1. Economy

To ensure a strong employment base, development should provide a range of floorspace, land and premises as part of mixed-use developments. Development should promote more intensive use of land to meet identified needs for start-up and grow-on space for small and medium sized enterprises including the digital creative industries, technology, financial and cultural and leisure services clusters. To support this, loss of existing office floorspace will be resisted.

Development of buildings for further and higher education, training and lifelong learning will be supported in the city centre. The development of purpose-built student accommodation will be accepted where it accords with the criteria in policy 5.

2. Retail and main town centre uses

The centre's retail function will be supported as part of a complementary range of uses. Provision for any additional comparison retail floorspace will primarily be met through the intensification of retail use on existing sites.

Proposals for new development and change of use in primary and secondary retail areas and large district centres (as defined in policy 6) will be accepted where they:

- contribute to meeting identified needs for new retail floorspace and other main town centre uses, including speciality and independent shopping and small-scale retailing; or
- promote diversification of services and facilities to ensure that vitality and vibrancy can be maintained throughout the day and evening; or
- provide mixed-use development including housing, high quality employment, flexible working, education, leisure, culture and entertainment, where this supports and complements the function of the centre; or
- secure the beneficial redevelopment and adaptation of disused and underused land and premises including redundant retail floorspace.

3. Leisure, culture and entertainment and the visitor economy

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The city centre's leisure cultural and entertainment offer will be supported and expanded. Development of new leisure and cultural facilities, hotels and other visitor accommodation to strengthen the city centre's role as a visitor and cultural destination will be accepted in accessible locations well related to centres of activity and transport hubs. Leisure uses, including uses supporting the early evening economy, will be accepted within the defined city centre leisure area where noise and disturbance issues can be mitigated and where they do not have detrimental effect on the retail offering, especially in the primary retail area. A sequential approach will be used to determine applications for leisure uses outside the defined leisure area. Late-night uses will only be accepted in the designated Late-Night Activity Zone.

4. Housing

To maximise the potential of the city centre to deliver new homes, housing will be required on the specific allocated sites detailed in the Sites document.

5. The Built, Natural and Historic Environment

To protect and enhance the distinctive natural and built environment and heritage assets of the city centre:

- A programme of improvements to public spaces, as illustrated in a public realm infrastructure plan, will be implemented through a combination of public investment on the highway / publicly owned land and private investment in association with development proposals;
- New development proposals will respect the character of the city centre conservation area and address the principles set out in the City Centre Conservation Area Appraisal (or any successor), providing innovative and sustainable design; in particular in relation to scale, mass, height, layout and materials
- Riverside development will assist in delivering the policies/ priorities of the River Wensum Strategy (or any successor), including provision of a riverside walk. Riverside development should support and enable achievement of the strategy's longer-term plans.

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6. Access and Transportation

Development will be required to contribute to measures promoted by Transport for Norwich to improve accessibility, connectivity, legibility and permeability within the city centre.

East Norwich

Development of sites allocated in the East Norwich strategic regeneration area identified on the Key Diagram and defined on map 9 including Carrow Works, the Deal Ground and the Utilities Site will create a highly sustainable mixed-use gateway quarter accommodating substantial housing growth and optimising economic benefits. Development across the sites will provide in the region of 4,000 additional homes in the plan period and significant new employment opportunities for around 6,000 jobs. East Norwich also has the potential to act as a long-term catalyst for regeneration of the wider area, potentially including the following sites if they become available:

- Redevelopment of land adjoining the railway between the Deal Ground and Carrow Works as part of the wider East Norwich strategic growth area masterplan supplementary planning document;
- Land east of Norwich City F.C.;
- Land owned by Network Rail on Lower Clarence Road and Koblenz Avenue
- Intensification of uses at Riverside and
- Regeneration in the Rouen Road area.

Site proposals within the East Norwich strategic regeneration area will meet the requirements of an area-wide masterplan to ensure co-ordinated development. This will include:

- an exemplar design approach, building at high densities and maximising the riverside regeneration potential to create a distinct, highly sustainable mixed-use community and new gateway quarter for the city, taking account of its setting adjacent to the Broads;
- creating an inclusive, resilient and safe community in which people of all ages have good access to high quality homes that meet housing needs the provision of areawide economic and social infrastructure and services, including (but not limited to) the creation of new employment opportunities, a new local centre, and a new primary school should need be established;

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- establishing an integrated access and transportation strategy which emphasises sustainable accessibility and traffic restraint, and allows for connectivity and permeability within and between the sites in the strategic regeneration area and beyond, including north-south links between Trowse and Bracondale and the north bank of the Wensum and Thorpe Road / Yarmouth Road, and east-west between the city centre, the railway station and Whitlingham Country Park and the Broads including an extended riverside walk on the north and south banks of the Wensum. Proposals should be designed for ease of access to, and by, public transport, with appropriate bridge provision to ensure the sites are fully permeable by sustainable transport modes;
- planning development effectively to manage and mitigate the impact of vehicular traffic from the site/s on the local highway network including the Martineau Lane roundabout, Bracondale and King Street;
- protecting and enhancing green infrastructure assets, corridors and open spaces within the area, including enhancing linkages from the city centre to the Broads, Carrow Abbey County Wildlife Site the wider rural area and elsewhere in Norwich, to include pedestrian/cycle links between Whitlingham Country Park and the city centre;
- providing for sustainable energy generation, including a local energy network serving the area as a whole;
- protecting and enhancing the sites' and wider city's rich heritage assets and their settings;
- achieving high quality, locally distinctive, energy efficient and flood resilient design which addresses identified risks from river and surface water flooding and mitigates against potential sources of noise and air pollution and establishes strong built frontages along the River Wensum and the defining network of streets and spaces with the sites;
- addressing and remediating site contamination; and
- planning to allow scope for greater use of the Rivers Wensum and Yare for water based recreation, leisure and tourism including the potential inclusion of marinas and riverside moorings and access for waterborne freight subject to not impeding navigation of either river.

Elsewhere in the urban area including the fringe parishes

The remainder of the urban area including the fringe parishes will provide for a significant proportion of the total growth in Greater Norwich. Development will provide a range of sites for different types of housing, employment and community uses that are accessible and integrate well with the existing communities. It will provide necessary infrastructure, with a focus on public transport, walking and cycling, as well as social and green infrastructure.

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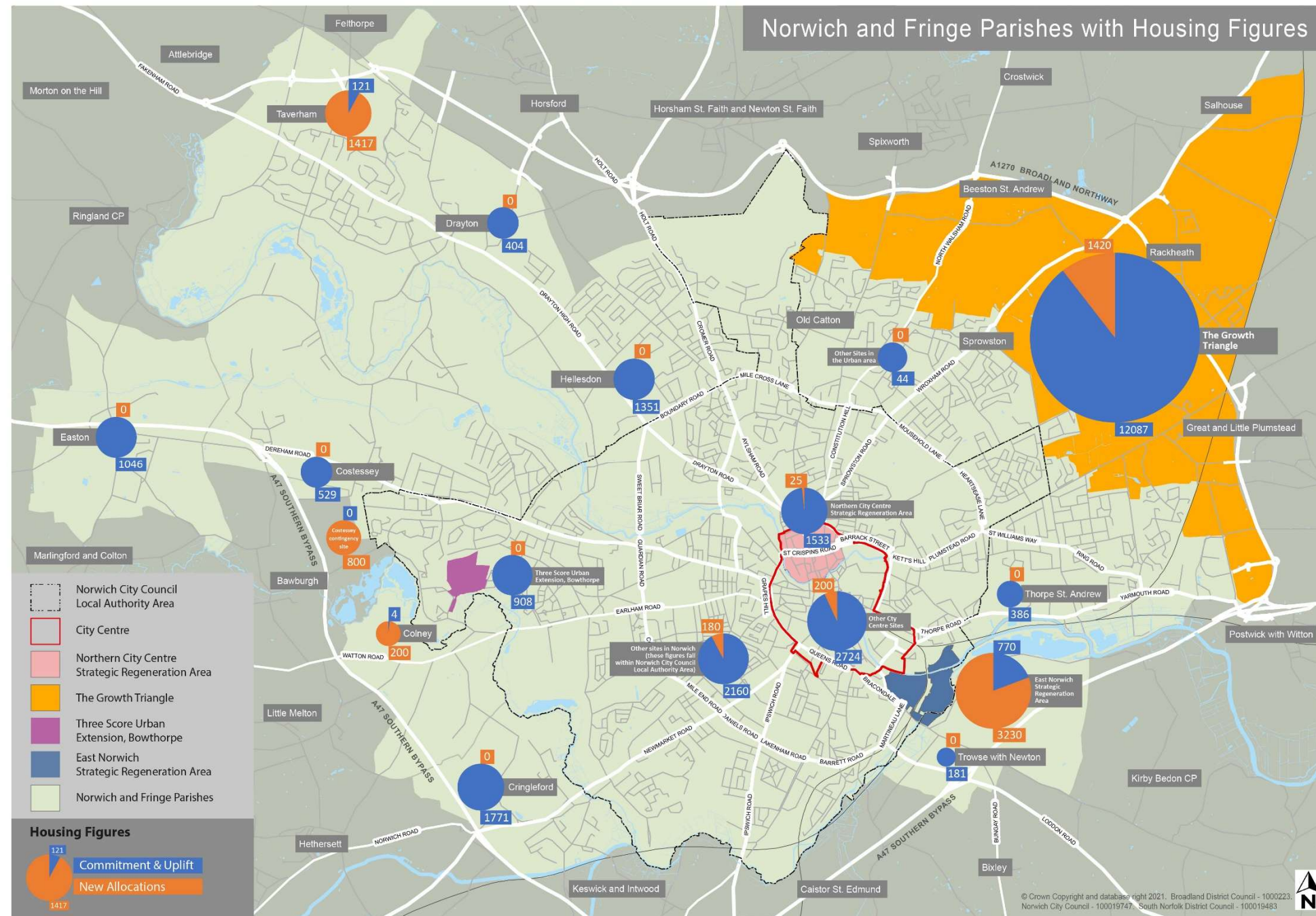
Growth will include:

- Development of strategic and smaller scale urban extensions at existing locations committed for housing and employment uses as set out in the tables above (including that within the adopted Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Area Action Plan), with uplift on existing allocated sites in Cringleford, Easton and Three Score (Bowthorpe);
- Significant new development proposals (including the expansion of the Norwich Research Park, and a large new allocation for homes in the Growth Triangle in Sprowston);
- Development at the University of East Anglia to cater for up to 5,000 additional students by 2038 through intensification of uses within the campus and its limited expansion;
- Development sites in the Sites document which will support neighbourhood-based renewal on brownfield sites, with densities highest in the most accessible locations and
- Enhancements to the green infrastructure network which will include links to and within the Wensum, Yare, Tud and Tas Valleys, Marriott's Way and from Mousehold through the north-east growth triangle as set out in maps 8A and B, along with local networks.

In addition, a large contingency site is identified in Costessey to be brought forward if delivery of housing in the GNLP area does not meet local plan targets.

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Appendix 2: Norwich Urban Area Housing Growth Map



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Appendix 3: Schedule of Minor Modifications to the GNLP Part 1 The Strategy, Policy 7.1

Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
Policy 7.1 – East Norwich	Grammatical correction as highlighted in representation 23355	<p>Minor modifications corrections to policy 7.1 of the plan:</p> <ul style="list-style-type: none"> Add full stop after '<i>benefits</i>' and preceding '<i>Development</i>' in fourth line of policy text under East Norwich heading: ...optimising economic benefits. (add full stop here) Development across the sites... Add comma after '<i>needs</i>' and preceding 'the' in second line of second bullet of second set of bullets in policy text under East Norwich heading: ...that meet housing needs, (add comma here) the provision of area- wide economic...

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Appendix 4: Schedule of Minor Modifications to the GNLP Part 2 The Sites, Norwich

Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
CC2 policy	<p>Factual Correction partly in response to Historic England's request in representation 23994</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of</p>	<p>Additional policy Criterion:</p> <p>The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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	main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	
Paragraph 2.120 (supporting text to policy CC4a)	<p>Factual Corrections partly in response to Historic England’s request in representation 23996</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3</p>	<p>Make factual correction/minor modification Add sentence to paragraph 2.120 to state: Development of the sites must address a number of constraints including its location within the City Centre Conservation Area and the Area of Main Archaeological Interest.</p> <p>Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application</p>

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	Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	
Paragraph 2.121 (supporting text to policy CC4a)	Typographical/grammatical error as highlighted in representation 23370	<p>Make a minor modification to correct the misspelling of ‘use’ in para. 2.121.</p> <p>Sites CC4a and 4b are likely to accommodate at least 250 homes with around 50 being accommodated on site CC4a and 200 on site CC4b. More may be accommodated, subject to an acceptable design and layout being achieved. Development of site CC4a should explore continued use/re-provision of the existing community garden facility. Development of site CC4b must be of a scale</p>

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		and form which respects and takes advantage of its riverside context and location in respect to the Broads National Park
Supporting text to policy CC4a	Factual Correction in response to additional information provided by Anglian Water in representation 23907	Make a minor modification to the supporting text to add text at the end of paragraph 2.120 to read: In addition, there is an existing surface water sewer in Anglian Water's ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance.
Supporting text to policy CC4a	To provide clarification / consistency partly in response to representation 23369	Make a minor modification to add the following text in bold print after the final sentence of paragraph 2.121 so that it reads: Development of site CC4b must be of a scale and form which respects and takes advantage of its riverside context and location in respect to the Broads National Park. As the site lies adjacent to the River Wensum, it is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority.
Policy CC4b	Factual Correction partly in response to Historic England's request in representation 23997	Make factual correction/minor modification. Additional Criterion in policy: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.

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	<p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed</p>	
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	as a “minor modification” to the Plan.	
Policy CC7	<p>Factual Correction partly in response to Historic England’s request in representation 23998</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified</p>	<p>Make factual correction/minor modification Additional Criterion:</p> <p>The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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	that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	
Policy CC8	<p>Factual Correction partly in response to Historic England’s request in representation 23999</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as</p>	<p>Make factual correction/minor modification Additional Criterion:</p> <p>The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application prior to development.</p>

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	within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	
Policy CC10	Factual Correction as highlighted in representation 24000	Make the following minor modifications: A typographical error has been highlighted. Deletion of the repeated criterion 2 is appropriate.
Policy CC11	Factual Correction partly in response to Historic England’s request in representation 24001	Make factual correction/minor modification Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.

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	<p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a "minor modification" to the Plan.</p>	
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Paragraph 2.203, supporting text to policy CC16	To provide clarification / consistency partly in response to the request made by the Broads Authority in representation 23371	Make the following minor modification to paragraph 2.203 adding the following wording: The site lies adjacent to the River Wensum. It is recommended that developers engage in early discussions with the Environment Agency and the Broads Authority .
Policy CC18 (CC19)	Factual Correction partly in response to Historic England's request in representation 24005 Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in	Make factual correction/minor modification Additional Criterion: The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.

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	<p>recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	
Policy CC24	<p>Factual Correction partly in response to Historic England’s request in representation 24006</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development</p>	<p>Make factual correction/minor modification Additional Criterion:</p> <p>The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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	<p>Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	
Policy CC30	<p>Factual Correction partly in response to Historic England’s request in representation 24007</p>	<p>Make factual correction/minor modification Additional Criterion:</p>

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	<p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed</p>	<p>The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>
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	as a “minor modification” to the Plan.	
Policy GNLP0068	Correction of typographical error	<p>Make a minor modification adding a full stop before the final sentence of the bold allocation text.</p> <p>Land adjacent to the River Wensum and the Premier Inn, Duke Street (approx. 0.12ha) is allocated for residential-led mixed use development. This will include a minimum of 25 homes (or if developed for student accommodation, a minimum of 125 student bedrooms). (add full stop here) A small element of commercial, office, and/or educational use at ground floor level may also be acceptable.</p>
Policy GNLP0068	<p>Factual Correction partly in response to Historic England’s request in representation 23980</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9</p>	<p>Make factual correction/minor modification Additional Criterion:</p> <p>The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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	<p>'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a "minor modification" to the Plan.</p>	
GNLP0133BR (policy)	<p>Typographical error as highlighted by site promoter in representation 24076</p>	<p>Make a minor modification to correct the following error/factual change: 'Use Class F1' to be revised to read 'Use Class F.1'.</p>

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Paragraph 2.35 of supporting text to policy GNLP0133C	Additional detail / clarity provided by Anglian Water in representation 23896	Minor modification to make a change to the supporting text inserting “There is an existing water mains in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance” to paragraph 2.35
Policy GNLP0133DR	Correction of typographical / grammatical error as highlighted in representation 23982	<p>Make a Minor modification to correct the following error/factual change: 'addition of a comma after the word 'Terraces' and before the word 'Grade' in criterion 2 of the policy text</p> <p>Development should take account of its sensitive location adjoining the University Broad, protect the visual setting of the south elevations of “The Prospect” and respect the heritage significance and setting of the listed buildings within the campus, including the grade II* Sainsbury Centre and Norfolk and Suffolk Terraces, (add comma here) Grade II listed Lasdun Teaching Wall and Library and locally identified Crescent Wing of the Sainsbury Centre, Suffolk Walk, School of Music, Drama studio and Nelson Court; balanced against having regard to Lasdun’s original architectural vision which must be a material consideration in its design.</p>
Paragraph 2.37 of supporting text to	Correction of typographical / grammatical error partly in response to Historic England’s	Make a minor modification to the supporting text to paragraph 2.37 to add “Assessment will also be required of any archaeology interest which may remain” following the second sentence.

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Policy GNLP0133DR	request in representation 23982	The policy seeks to enable expansion of the university, whilst conserving the landscape and architectural significance of the UEA and promoting public access to open spaces. Therefore it is essential that development of the site minimises impact on the river valley and enhances the setting of the listed buildings at the university. Assessment will also be required of any archaeology interest which may remain. Consideration of the original Lasdun plan for a 'Village on the hill' will be important, as will design taking full account of other buildings of visual importance to the southern view of 'The Prospect', including the School of Music and Suffolk Walk. Intrusion into the valley should be limited to protect the valley's appearance and use.
Paragraph 2.51 of supporting text to Policy GNLP0401	Correction of typographical / grammatical error in response to representation 23367	Minor modification: delete brackets around "at least 250 bedrooms" at paragraph 2.51 The site is likely to accommodate at least 100 homes, or if the site is developed to include student accommodation at least 250 bedrooms. More housing may be accommodated, subject to an acceptable design and layout being achieved.
Supporting text to policy GNLP0401	Additional detail / clarity provided by Anglian Water in representation 23901	Make a minor modification to the supporting text inserting an additional paragraph stating: "There is an existing water mains in Anglian Water's ownership within the boundary of the site. This should be taken into

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		account in the design of the development including safeguarding suitable access for maintenance”
Supporting text to policy GNLP0409AR	Additional detail / clarity partly as provided by Anglian Water in representation 23904	Make a minor modification to the supporting text inserting an additional paragraph stating: “There is an existing surface water sewer in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance”
Policy GNLP0409AR	<p>Factual Correction partly in response to Historic England’s request in representation 23985</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as</p>	<p>Make factual correction/minor modification Additional Criterion:</p> <p>The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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	within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	
Supporting text to policy GNLP0409BR	Additional detail / clarity as provided by Anglian Water in representation 23903	Make a minor modification to the supporting text inserting an additional paragraph stating: “There is an existing surface water sewer in Anglian Water’s ownership within the boundary of site GNLP0409BR. This should be taken into account in the design of the development including safeguarding suitable access for maintenance”
Paragraph 2.57 of supporting text to policy GNLP0409BR	Additional detail / clarity partly in response to Historic England’s request in representation 23986.	Make a minor modification to the supporting text to paragraph 2.57 to add “Assessment will also be required of any archaeology interest which may remain to site GNLP0409BR” following the second sentence.

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		<p>2.57 The western section of the site is within the City Centre Conservation Area and the site also contains standing remains of the city wall (Scheduled Monument), two Grade II listed cottages (77-79 Barrack Street) and two locally listed cottages. The site is situated within the area of main archaeological interest and it has been identified that the site has significant underground archaeological remains. Assessment will also be required of any archaeology interest which may remain to site GNLP0409BR. It is important that the development protects and enhances the setting of the wall.</p>
Policy GNLP0451	<p>Factual Correction partly in response to Historic England's request in representation 23987</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and</p>	<p>Make factual correction/minor modification Additional Criterion:</p> <p>The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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	Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	
Supporting text to policy GNLP0506	Additional detail / clarity provided by Anglian Water in representation 23905	Make a minor modification to the supporting text inserting an additional paragraph stating: “There are existing mains and foul and surface water sewers in Anglian Water’s ownership within the boundary of the site. This should be taken into account in the design of the development including safeguarding suitable access for maintenance”
Policy GNLP0506	Factual Correction partly in response to Historic England’s	Make factual correction/minor modification Additional Criterion:

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	<p>request in representation 23988</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a</p>	<p>The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>
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	factual correction is proposed as a “minor modification” to the Plan.	
Policy GNLP2114	<p>Factual Correction partly in response to Historic England’s request in representation 23990</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest”</p>	<p>Make factual correction/minor modification Additional Criterion:</p> <p>The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>

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	has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	
Policy GNLP3054	<p>Factual Correction partly in response to representation 23993</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as</p>	<p>Minor modification as a factual correction to the second sentence of criteria 2, delete reference to listed buildings on site as there are none within the defined red line boundary:</p> <p>Proposals will include the protection of the locally listed buildings on the site and the enhancement of the significance of the setting of designated heritage assets both on and off site</p> <p>Make factual correction/minor modification Additional Criterion:</p> <p>The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application</p>

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	<p>within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.</p>	
<p>Policy 0360/3053/R10 (policy)</p>	<p>Typographical / spelling correction partly in response to representation 23363</p>	<p>Minor modification: Correction of typographical error to correct spelling of “affected” at criterion</p> <p>There will be the general presumption in favour of the repair and re-use of heritage assets on site as part of any site regeneration, however any application for redevelopment will be considered on its merit. Great weight will be given to the conservation of all designated heritage assets and proposals should provide a suitable setting for designated heritage assets affected by the proposal on an off site including key views from and into the site. Development proposals should</p>

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		draw upon local character and distinctiveness and preserve or enhance the character and appearance of the conservation areas affected, Scheduled monuments, listed building, locally listed buildings and other non designated heritage assets on and adjacent to the site (including any contribution made to their significance by setting). Development proposals should also consider heritage assets below ground and the impact upon the Broads.

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Appendix 5: Schedule of Minor Modifications to the GNLP Part 2 The Sites, The Urban Fringe

Policy/Paragraph	Reason for Change	Revised wording (revised text in bold)
Taverham Site Policy and Map GNLP0337 -	Factual correction to exclude Marriott's Way (REP ID 24080)	Site Hectare changed to 78.36 ha
Thorpe St Andrew para 3.75	Factual Update for Thorpe St Andrews (REP ID 23373)	last sentence, amend as follows ' the Church of St Andrew and its ruins ' – as both the church and ruins are listed
Policy GNLP0253 Colney	Site allocation policy refers to use call D1. This use class has been discontinued. (REP ID 24318))	Reference should be changed to use ' class E(e) '
Site Policy DRA1	is partly underlain by sand and gravel resources therefore Policy CS16 of the M&W Local applies (REP ID n/a)	Add ' site is partly underlain by sand and gravel resources therefore Policy CS16 of the M&W Local applies '

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Appendix 6 - Large Urban Fringe Housing Sites

This appendix sets out considerations on a site-by-site basis concerning the choice of sites of 200 plus dwellings in the Norwich Urban Fringe proposed for allocation through the GNLP. It is intended to assist their consideration at examination.

The [Reg18C draft plan](#) (paragraph 164) focussed “*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.*”

Following publication of the Government’s “Planning for the Future” consultation and the 2018 based household projections, it was considered prudent to increase the allocated housing numbers in the Regulation 19 draft plan to proactively address the direction of travel of national policy. The additional growth has been largely focussed on the Norwich urban area.

In the urban fringe parishes eighteen sites of 200+ proposed dwellings were submitted for consideration through the call for sites and subsequent consultation periods. Further to this there are five sites of this scale which are in the parish of Horsford but can be considered as part of the urban fringe due to their location south of the Northern Distributor Road (NDR) and location adjacent to the built-up area of Hellesdon/Drayton. As with all submitted sites, they were assessed on a case-by- case basis. This process is detailed in the site assessment booklets, with the methodology set out in the [introduction document](#).

Of these 23 sites, nine have been proposed for allocation in the GNLP and one has been proposed as a contingency site. These sites contribute a combined potential 8,109 dwellings. This is 16% of the total number of homes in the plan.

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The sites proposed for allocation represent sustainably located development which have a high expectancy of deliverability. These sites have no major or significant constraints that would delay development. The sites have demonstrated progression towards a planning application (GNLP0337R, GNLP0132) , or constitute uplift of existing development proposals, some of which relate to sites which are already under construction, with the uplift an additional phase in the development process.

The site allocation at Colney provides a unique development opportunity for housing for the elderly and associated research on well-being and ageing. Other sites include existing adopted allocations which are in the early phases of development and benefit from a carried forward allocation to oversee them to completion.

This appendix also covers submitted sites which were not selected for inclusion in the GNLP. There were varying reasons for non-selection, including:

- insufficient evidence deliverability;
- constraints which were considered to potentially inhibit deliverability or provide a less optimal form of development to those sites selected for allocation;
- existing consents which were not considered to require an allocation to bring them forward.

It is important to note that it is not necessary to allocate every site submitted in order to meet the housing need for the GNLP area. The housing allocation in the submitted draft of the GNLP provides sites to meet the local housing requirement with a buffer of 22%. As stated in paragraph 178 of the GNLP strategy: *“it is normal practice to identify additional potential supply to buffer against under-delivery, typically around 10%. This plan includes a significantly larger buffer to provide the potential to accommodate higher growth rates...”*.

The tables below set out considerations for the proposed selection and non-selection or large proposed sites in the Norwich fringe.

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Table 1 - Sites of 200+ dwellings in the Norwich fringe proposed for allocation in the GNLP

Reference	Location	Proposed allocation	Considerations
GNLP0253	Colney Hall, Watton Road	Mixed-use residential development, proposed for 200 retirement properties, an associated facility for lifelong learning and support, and a well-being therapy centre	(Urban Fringe) Proposed as allocation – Unique development opportunity.
GNLP0581 / 2043	Land off Bawburgh Lane and New Road/North of New Road, east of A47	800 dwellings – contingency site	(Urban Fringe) Proposed as contingency site.
HOU1/ GNLP0307/ GNLP0327	Land north of the A11 (Cringleford)	1,710 dwellings residential development and associated infrastructure	(Urban Fringe) Proposed for allocation with uplift in housing numbers to an carried forward allocation which has already commenced on site (see also appendix 5 of the Growth Options topic paper as this is a strategic site).

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DRA1	Land east of Cator Road and north of Hall Lane, Drayton	250 dwellings residential development, allotments and open space	(Urban Fringe) Carried forward allocation with substantial progress to consent.
EAS1	Land south and east of Easton	Residential Development 1,044 dwellings (possible reduction to 954 homes)	(Urban Fringe) Proposed for allocation with uplift in housing numbers, consent in place and development commenced on site (see also appendix 5 of the Growth Options topic paper as this is a strategic site).
HEL1	Land at Hospital Grounds, southwest of Drayton Road, Hellesdon	300 dwellings, and employment uses.	(Urban Fringe) Existing allocation carried forward.
HEL2	Land at the Royal Norwich Golf Club, either side of Drayton High Road,	1,000 dwellings	(Urban Fringe) Allocation carried forward, outline consent in place and phase one under way on site (see also appendix 5 of the Growth Options topic paper as this is a strategic site).
GNLP0172	Land to the west of Green Lane West, Rackheath	205 dwellings	(Urban Fringe) Proposed as allocation. Resolution to approve planning application.
GNLP0132	Land off Blue Boar Lane/Salhouse Road, White House Farm	Approx. 1,200 dwellings including public open space, sports pitches, landscaping etc	(Urban Fringe) Proposed as allocation through the GNLP. Significant progress towards planning application. This site would be an additional phase to adjacent sites

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			currently under development (see also appendix 5 of the Growth Options topic paper as this is a strategic site).
GNLP0337R	Land between Fir Covert Road and Reepham Road	Residential-led development of circa 1,400 dwellings, associated public open spaces and on-site attenuation, a new primary school and a local centre	(Urban Fringe) Proposed as allocation through the GNLP. Significant progress to planning application (see also appendix 5 of the Growth Options topic paper as this is a strategic site).

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Table 2 - Sites of 200+ dwellings in the Norwich fringe not proposed for allocation in the GNLP

Reference	Location	Proposed allocation	Considerations
GNLP0284R	Townhouse Road, Costessey	Residential. 3 masterplan options of different sizes put forward, larges for 200 homes	(Urban Fringe) Not allocated due to flood risk, landscape impacts on river valley and heritage considerations.
GNLP0266	Costessey Landfill Site, and adjoining land, Dereham Road	Mixed use, no firm proposal but suggested it could potentially include 1,000-1,500 homes	(Urban Fringe) Not allocated – issues relating to isolated development, landfill contamination, proximity to schools and land may be required for highways.
GNLP0301	Land east of Drayton Lane and north of Hall Lane	Approx. 273 dwellings	(Urban Fringe) Not allocated due to being poorly related to Drayton in terms of landscape, townscape and services
GNLP0415 A-G	Honingham Thorpe	New Settlement	(Urban Fringe) Not allocated – this is a proposed new settlement, the GNLP does not allocate new settlements.

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GNLP2166	South of Warren Road, Rackheath	216 dwellings plus GI	(Urban Fringe) Not allocated as it is located within land allocated as a landscape buffer to the NDR and close to Rackheath Hall and its historic gardens with likely landscape character and heritage impacts. Access to facilities is poor and Rackheath Primary school is located on the other side of the NDR with no safe walking route available
GNLP4014	East of Fir Covert Road, Taverham	Theoretically 300 at a 30dph	(Urban Fringe) Not allocated. The site is not considered to be suitable for allocation as it is separate from the built-up area and settlement boundary and therefore disconnected from services and facilities with no safe pedestrian access into Taverham
GNLP0228	Land to the East side of Woodside Road (Thorpe Woodland), Thorpe St Andrew	10.48Ha Mixed use (unspecified number) (provides links to Woodside to development to north east of the site)	(Urban Fringe) Not allocated as there are other more preferable sites which do not involve the loss of a county wildlife site and which have fewer ecological and biodiversity impacts. This site also has issues with surface water flood risk.

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GNLP0442	Racecourse Plantations, Plumstead Road East	10 ha for up to 330 dwellings with remainder of the site designated as a community wood land park	(Urban Fringe) Not allocated – recent consent granted on appeal, allocation not considered necessary for delivery.
GNLP0302	Land off Reepham Road, Horsford	150-200 dwellings	Horsford Village Cluster, but south of NDR separated from the core of the village. Not Allocated as it is some distance from the built-up area of Horsford, separated by the NDR. It is closer to Drayton but still separated from the built-up area. Development here would be remote and potentially quite prominent in the landscape. There are no safe walking routes to catchment schools in Horsford. Non catchment schools in Taverham or Drayton are closer but again with no safe walking route.
GNLP0332R	Reepham Road/Cromer Road, Horsford	600-700 dwellings	Horsford Village Cluster, but south of NDR separated from the core of the village Not Allocated – the site raises potentially significant landscape issues given the scale of the proposed development and the setting between the existing built edge and the NDR. Noise and safety concerns with the airport are also critical.

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			Surface water SuDS are unlikely to be allowed due to the potential to attract birds to this location close to the airport.
GNLP0333	Reepham Road/Holt Road	36.60Ha Residential (unspecified number), improved cricket field, employment, roadside services and retail	<p>Horsford Village Cluster, but south of NDR separated from the core of the village</p> <p>Not allocated - it is some distance from the built-up area of Horsford, separated by the NDR. It is closer to Hellesdon or Drayton but still separated from the built-up area. Development here would be remote and have potentially significant landscape impacts. There are no safe walking routes to catchment schools in Horsford. Non catchment schools in Hellesdon or Drayton may be closer but again with no safe walking route.</p>
GNLP0334R	West of Reepham Road, Horsford	250-300 dwellings	<p>Horsford Village Cluster, but south of NDR separated from the core of the village</p> <p>Not allocated – the site is not considered to be reasonable for allocation as it would represent a significant expansion into the countryside and would impact on the character of Reepham Road.</p> <p>Noise and safety concerns linked with the airport are also critical.</p>

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			Surface water SuDS are unlikely to be allowed due to the potential to attract birds to this location close to the airport. Roadside trees may impact on achieving suitable access
GNLP0419	Land at Holly Lane/ Reepham Road, Horsford	Approx. 750 dwellings with associated access and open space	<p>Horsford Village Cluster, but south of NDR separated from the core of the village</p> <p>Not allocated - this site is considered to be unreasonable for allocation as it is some distance from the built-up area of Horsford, separated by the NDR. It is closer to Hellesdon or Drayton but still separated from the built-up area. Development here would be remote and have potential significant landscape impacts. There are no safe walking routes to catchment schools in Horsford. Non catchment schools in Hellesdon or Drayton may be closer but again with no safe walking route.</p>

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