

Topic Paper: Policy 7.2 Main Towns

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Summary

The Greater Norwich Local Plan (GNLP) identifies five Main Towns and this topic paper summarises the process for reaching the policy choices and site allocations for these settlements. This topic paper explains the various scenarios presented in the Growth Options document of 2018, detailing for the Main Towns how existing commitment, a baseline level of growth, and choices made about housing development would result in between 6,018 and 7,118 new homes.

This topic paper continues by explaining how between Regulation 18C in 2020 and Regulation 19 in 2021 the Strategy for the Main Towns evolved. There was the addition of a second site in Aylsham, changes to policy in Diss that relate to the good progress being made by the Neighbourhood Plan, revision to a site in Harleston, revision to a site in Wymondham, and deletion of the 1,000-home contingency for development in Wymondham.

As context, 10% of existing homes in the Greater Norwich area were in the Main Towns at the start of the plan period in 2018. The GNLP now provides for 6,806 additional homes in Main Towns between 2018 and 2038, forming 14% of the total housing growth for Greater Norwich. The GNLP splits the growth between the Main Towns proportionately, taking account of existing development commitment in each settlement, and recognising the existing Area Action Plans for Long Stratton and Wymondham.

The topic paper concludes that the scale of growth for the Main Towns is reasonable and will support the retention and enhancement of local services, which will in turn support a vibrant rural economy and a sustainable pattern of growth.

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Purpose

1. This topic paper is part of a series of papers which provide further justification and explanation of the GNLP. In this case the focus is on Policy 7.2 for the Main Towns, but it should be read in context, and alongside especially 'Policy 1 - The Sustainable Growth Strategy' and the Part 2 Sites Plan, Section 4.
2. This Topic Paper contains the following:
 - the policy background to the settlement hierarchy approach and existing local policy;
 - a brief summary of the opportunities and constraints for each Main Town as identified in various evidence documents;
 - a summary of the evolution of the GNLP policy for Main Towns and representations made by key stakeholders at Regulation 18;
 - identification of the changes to the Main Towns policy for Regulation 19; and
 - a summary of representations received to the Regulation 19 Pre-submission document.

Background

3. The Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS), which was adopted in March 2011 with amendments adopted in January 2014, identified a settlement hierarchy for Greater Norwich to ensure growth was directed in proportion to the level of local service provision.
4. JCS Policy 13 defined the Main Towns in Greater Norwich as Aylsham, Diss, Harleston and Wymondham. Further to this, JCS Policy 10 identified Wymondham and Long Stratton, both in the defined Norwich Policy Area (NPA), as strategic locations with the potential for more significant growth. This led to the preparation of area action plans (AAPs) for Long Stratton and Wymondham, with growth at Long Stratton meaning it would become a Main Town rather than a Key Service Centre.
5. Accordingly, JCS Policy 13 set a minimum growth of 300 homes in Aylsham, 300 homes in Diss, and 200-300 homes in Harleston, along with the expansion of employment and town centre uses in these towns.
6. Under JCS Policy 10, Long Stratton and Wymondham were identified for major expansion. Long Stratton was identified for 1,800 homes supporting an A140 by-pass at this congested location on the Major Roads Network. Wymondham was identified for 2,200 homes, reflecting its level of services and strategic location on the A11 Corridor with good rail links.

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7. The GNLP continues this approach, planning for new development appropriate to the local range of services and facilities in each Main Town. The Growth Options document of January 2018 named the Main Towns as Aylsham, Diss, Harleston, Long Stratton, and Wymondham. As well as recognising the higher growth being carried forward in AAPs for Long Stratton and Wymondham.

Context

8. As context, the following provides short introductions to past and present site allocations.

Aylsham – Existing Allocations

9. Existing residential allocations in Aylsham to reflect the JCS were adopted through the Broadland Site Allocations Development Plan Document in 2016. Two sites were allocated: AYL1 north of Cawston Road for approximately 250 homes; and, AYL2 north of Burgh Road for approximately 300 dwellings. Two other small employment allocations at the Dunkirk Industrial Estate, to the north-west of the town, were also made to reflect the established employment uses there.
10. More recently, the Aylsham Neighbourhood Plan was 'made' in July 2019 and covers the period to 2038. The vision states that: *'The market town of Aylsham is renowned for its individuality and historical importance. It is vital that these are protected whilst promoting its unique character, excellent location and strong sense of community.'*

Diss – Existing Allocations

11. The South Norfolk Site Allocations Development Plan Document (DPD) in 2015 provides the most recently agreed allocations for Diss. These were: DIS 1 north of Vince's Road for 35 homes; DIS 2 off Park Road for 10-15 homes; DIS 3 off Denmark Lane (Roydon parish) for 42 homes; DIS 4 north of Frenze Hall Lane for 125 homes; DIS 5 at the Former haulage depot at Victoria Road for 15 homes; DIS 6 at the former Hamlins Factory site, Park Road, for mixed use development; DIS 7 at the Feather Mills site, Park Road, for mixed use development; DIS 8 at Station Road/Nelson Road for employment uses; DIS 9 at Sandy Lane (north of Diss Business Park) for employment uses; and, DIS 10 at Diss Business Park for employment.
12. More recently, good progress has been made with the Diss & District Neighbourhood Plan. During Summer 2020 an Issues and Options consultation took place, and in 2021 the plan is timetabled to progress towards examination, referendum, and (if successful) to eventually be 'made' and become part of the adopted Development Plan.

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Harleston – Existing Allocations

- Existing allocations for Harleston were adopted in 2015 through the South Norfolk Site Allocations Development Plan Document. These were: HAR 1 at Mendham Lane for 120 homes; HAR 2 at Mendham Lane for open space; HAR 3 at the Former Howard Rotavator Works, Mendham Lane, for 29 homes; HAR 4 at Spirkett's Lane for 95 homes; HAR 5 off Station Hill for mixed use development; HAR 6 north of Spirkett's Lane for employment; and HAR 7 south of Spirkett's Lane for employment.
- While still at a relatively early stage, a Neighbourhood Plan Area for the Redenhall and Harleston Town Council area was confirmed in September 2020.

Long Stratton – Existing Allocations

- Existing land use allocations were adopted during 2016 through the Long Stratton Area Action Plan, which is not being superseded by the GNLP. The Area Action Plan allocates land for a minimum of 1,800 new homes, 12 hectares of employment uses, an enhanced town centre and supporting infrastructure, most significantly including a by-pass on the eastern side of the settlement. These plans will grow Long Stratton from a well-served large village to a small town.

Wymondham – Existing Allocations

- The most recent land allocations were adopted through the Wymondham Area Action Plan (AAP) in 2015. It focuses on rebalancing development to the south of the town, between the Norwich/Cambridge rail line and the A11 bypass, and around the station, which also gives good access to the town centre. The AAP provides for at least 2,200 homes.
- More recently, in March 2020, Wymondham Town Council submitted a Neighbourhood Area application which was agreed. The designation means the town council are now the relevant body for the Neighbourhood Development Plan.

Evidence

- In 2018, at the start of the plan period, 19,400 of the homes in Greater Norwich were in the Main Towns, which equates to 10% of the 187,500 homes in the plan area.
- The capacity for the Main Towns to grow was assessed against the Sustainability Appraisal objectives to consider impacts from new development and to identify possible mitigations. Section C.8 of the Sustainability Appraisal (Volume 3, published January 2021) scored Policy 7.2 as follows:

'major positive' for: Housing; Population and Communities; Education; Economy;

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'positive' for: Deprivation; Health; Transport and Access to Services

'neutral' for: Crime; Historic Environment

'negative' for: Biodiversity, Geodiversity, and Green Infrastructure; Landscape; Water

'major negative' for: Air Quality and Noise; Climate Change Mitigation and Adaption: Natural Resources, Waste and Contaminated Land

20. Section C.8 goes on to explain that the negatives arise from more people using resources, use of greenfield land for development, and loss of agricultural land. Positives come from increased provision of housing for people, and that the towns have nearby facilities and employment opportunities. Mitigation measures include those incorporated into other GNLP strategic policies, such as Policy 2 for Sustainable Communities, Policy 3 for Environmental Enhancement and Policy 4 for Strategic Infrastructure.
21. As defined in the GNLP glossary, the Main Towns are engines of rural growth, providing employment and services for their wider hinterlands, and as such are appropriate for some level of housing growth.
22. As evidence, the following paragraphs provide a brief summary of each Main Town.

Aylsham – A Brief Summary

23. At its heart is the Market Place that is well-known for its twice-weekly market, and regular Farmers' markets. Important streets, for historic buildings and for trade in Aylsham, include Hungate Street, Penfold Street, and Red Lion Street. Within Aylsham there is a good range of speciality shops, and retailers to meet everyday needs, as well as local services such as GPs, primary schools and a secondary school. Associated to Aylsham is the key heritage and tourism asset of Blickling Hall. Located to the northwest, the Blickling conservation area extends southwards to the north-west edge of the town. Also defining the edge of Aylsham to the north, and east, is the River Bure. Whereas to the south and east the B1145 Cawston Road and A140 Cromer Road are important in defining the town's edges. For employment/industrial uses a distinct area is the Dunkirk Industrial Estate to the northeast of the town.

Diss – A Brief Summary

24. The historic core of Diss is formed by the Market Place, Market Hill, and St Nicholas Street and the town includes an exceptional concentration of listed buildings. There is a strong local employment base, three main supermarkets, a wide range of local shops and services in the town centre, and a full range of facilities (including secondary school, GP surgeries, leisure centre, and library). Open spaces are located within the heart of the town, including The Mere and adjacent park, as well as private open land that contributes significantly to the Town's character. To the

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south is the River Waveney and the Frenze Valley landscape lies to the east and southeast; meaning the town is surrounded by River Valley landscape, which also includes several County Wildlife Sites. Diss has a railway station with regular services to London and Norwich and is close to the A140. Despite its advantages, there are particular vehicular pressures in Diss on the A1066 Victoria Road and B1077 Denmark Street as they pass through the town, with congestion considered a barrier to more significant growth.

Harleston – A Brief Summary

25. Harleston is compact in form and sits on a plateau between Starston Beck to the north and the River Waveney to the south, meaning the town is surrounded by River Valley landscape. The town centre, which has a designated Conservation Area, has many historic buildings and is based on a triangle of roads comprising The Thoroughfare, Broad Street, The Old Market Place and Exchange Street. There is a good range of speciality shops, a local supermarket and a full range of local services (including GPs, secondary school, leisure centre and library). To the south of the town centre is the main employment area which benefits from good access to the A143.

Long Stratton – A Brief Summary

26. Long Stratton is a large village that is growing into a small town, with a recently formed town council. Long Stratton has a good range of services and facilities that are mainly located along The Street/Ipswich Road (the A140). On the western side of the town there are primary and secondary schools, a GP surgery, a library and a leisure centre. As well as having the main offices of South Norfolk Council and Saffron Housing Trust, a variety of businesses are located at Tharston Industrial Estate. Key to Long Stratton's future is a by-pass to facilitate a better-quality environment for the town centre.

Wymondham – A Brief Summary

27. Wymondham has a long and rich history. The Abbey was founded in 1107, and the 17th Century Market Cross remains the focal point of the town. To the west the River Tiffey Valley remains a largely intact rural landscape. Likewise, to the south-west, undeveloped views remain of the abbey from a considerable distance. Wymondham is in the A11 corridor with a dual carriageway by-pass and a railway station with regular services to Cambridge and Norwich. It has a wide range of services and facilities, including primary and secondary schools, GP surgeries, a leisure centre, a library, extensive outdoor recreation facilities and a variety of commercial and employment opportunities. On the edge of town, the Gateway 11 Business Park is well-established, and the town also has good access to high quality employment opportunities at Norwich Research Park and Lotus/Hethel Engineering Centre.

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Regulation 18 Consultations

28. An early task in preparing the GNLP was a 'Call for Sites' exercise in 2016. Landowners, agents, and developers submitted details of their sites, and information was collated and published online.

Regulation 18 Stage A (Reg 18 A) January 2018

29. The first major consultation was the Regulation 18 Stage A: Site Proposals and Growth Options (January 2018). Important features of this consultation included discussing the settlement hierarchy, defining which settlements constituted Main Towns (see paragraphs 4.115 to 4.148) and reaffirming the Main Towns as the second tier for growth after the Norwich Urban Area (see paragraphs 4.152 to 4.158).

30. The consultation of early 2018 discussed a series of 'Baseline Assumptions for growth of 3,900 homes (see paragraphs 4.49 to 4.55). This amounted to a baseline of 1,700 homes within Norwich and the built-up areas of the fringe parish to maximise delivery on previously developed land. For the Main Towns, Key Service Centres, and Other Villages a baseline minimum level of housing growth was proposed in order to maintain and enhance the vitality of these smaller settlements. The baseline growth for the Main Towns was set at 550 homes in addition to the 5,468 homes already committed to in existing site allocations and planning permissions.

31. The table below summarises the six growth options which were offered as a framework for considering different strategic approaches.

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Commitment from April 2017	Baseline	Growth Option	Total Homes (commitment + baseline + growth option)	Growth % (based on a total provision of 42,865 homes between 2017 and 2036)
5,468	550	Option 1: Concentration close to Norwich: 0	6,018	14
5,468	550	Option 2 Transport Corridors: 1,100	7,118	17
5,468	550	Option 3 Supporting the Cambridge Norwich Tech Corridor: 700	6,718	16
5,468	550	Option 4 Dispersal: 650	6,668	16
5,468	550	Option 5 Dispersal plus New Settlement: 650	6,668	16
5,468	550	Option 6 Dispersal plus Urban Growth: 150	6,168	14

32. Question 22 addressed the levels of development in the Main Towns. It asked: *Do you know of any specific issues and supporting evidence that will influence further growth in the Main Towns?* A total of 62 responses were received to this question. As well as specific points about each respective town, comments raised

concerns about 'local infrastructure (including health)'; 'transport'; 'housing'; and 'environmental issues'.

Regulation 18 Stage B (Reg 18B) October 2018

33. Towards the end of 2018, there was a further consultation (Reg18B) on the sites which had been submitted or revised during the Growth Options consultation, and on smaller sites which had not been included previously. This dealt with sites that were submitted or revised during the Stage A Growth Options consultation.

Regulation 18 Stage C (Reg 18C) January 2020

34. In January 2020, the Regulation 18 Stage C Regulation 18 Draft Strategy and Site Allocations consultation was held. Policy 7.2 of the Draft Strategy dealt with the Main Towns. Policy 1 is also relevant as it deals with the distribution of growth and the settlement hierarchy. The Site Allocations document accompanied the Regulation 18 Stage C Draft Strategy. This document contained the preferred sites for allocation, as well as details of reasonable alternatives for allocation, and details of sites deemed unreasonable for allocation.

35. During the Regulation 18C draft plan consultation, two questions (numbered 41 and 42) dealt with the Main Towns:

36. Question 41 asked: *"Do you support or object or wish to comment on the approach for the main towns overall?"* 24 responses were received to this question with four in support, four objections and 16 general comments.

37. Most responses to Question 41 were from development promoters who argued the merits of their specific site. In response to the feedback, the GNLP team commented on the allocation of 1,655 new homes in the Main Towns as being an appropriate scale of growth, and that overall the plan makes allocations for 10,704 homes. Where consultees spoke about a particular settlement or site these issues were dealt with as part of the Part 2 Sites Plan or relevant settlement assessment booklet.

38. Question 42 asked: *"Do you support or object or wish to comment on the approach for specific towns (Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham)?"* 35 representations were received to this question, six in support, 15 objections and 14 general comments.

39. Many responses to Question 42 came from various development promoters, but there were also comments from members of the public and organisations such as town councils. In response to the feedback, the GNLP team commented on how the distribution of growth had been both a "top-down and bottom-up process", meaning that as well as distributing housing based on the Local Housing Need for Greater

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Norwich, each settlement's capacity to absorb new development had been considered when assessing sites, along with individual site constraints.

40. The Regulation Reg18C consultation of January 2020 proposed 6,342 new dwellings on new housing allocations across the Main Towns and took account of the specific challenges of each settlement. The level of development proposed was consistent with that consulted on in the Growth Options document two years earlier.

41. In summary, the sites preferred for allocation in the Main Towns were as follows.

Aylsham at Reg 18C

42. There was one combined site preferred for allocation for 300 homes, reference GNLP0311, 0595 and 2060. Two other sites were deemed reasonable alternatives; GNLP0336 west of the A140 off Burgh Road; and, GNLP0596 on Norwich Road. In respect of employment, two small existing allocations were carried forward at Dunkirk (AYL3 and AYL4).

Diss at Reg 18C

43. There were two sites preferred giving potential for 400 additional homes. These were the Frontier site east of the railway (GNLP0102) and the combined site (GNLP0250/0342/0119/0291) north of the cemetery. Two other sites were deemed reasonable alternatives; GNLP0341 known as 'Parish Fields', and GNLP1045 which is located west of Nelson Road and east of Station Road. Five other existing allocations were carried forward: DIS 1 Land north of Vince's Road for 35 homes; DIS 2 Land off Park Road for open space and 10 homes; DIS 3 Land off Denmark Lane for 42 homes; DIS 8 Land at Station Road/Nelson Road for employment; and, DIS 9 Land at Sandy Lane for employment.

Harleston at Reg 18C

44. There were two sites preferred giving potential for 450 additional homes. These were the land south of Spirketts Lane (GNLP2108) and land at Briar Farm (GNLP2136). Four other sites were carried forward allocations: HAR 4 Land at Spirketts Lane for 95 homes; HAR 5 Land off Station Hill for mixed use development; HAR 6 Land north of Spirketts Lane for employment; and, HAR 7 Land south of Spirketts Lane also for employment.

Long Stratton at Reg 18C

45. There were no new sites identified as preferred options in Long Stratton, but the existing Long Stratton Area Action Plan gives a total deliverable commitment for 1,892 homes.

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Wymondham at Reg 18C

46. There were two sites preferred giving potential for 100 additional homes. These were Land at Johnson's Farm (GNLP0354) and Land North of Tuttle Lane (GNLP3013). This relatively modest level of additional growth reflected the existing commitment for 2,563 homes, but a series of reasonable alternatives were given to provide contingency options for up to 1,000 homes. Seven sites were deemed reasonable alternatives: GNLP0006, GNLP0525R, GNLP2150 and GNLP2155 to the north-east of Wymondham; GNLP0515 south of Wymondham; a new settlement west of Hethel GNLP1055; and, a new settlement at Silfield (GNLP2168).

GNLP Regulation 19 Policy and publication February to March 2021

Housing Numbers at Reg 19

47. For the Regulation 19 version of the GNLP significant changes affecting the Strategy and Sites Plan were made to add an additional 5,000 homes to the plan, but also to remove the 1,000-home contingency at Wymondham. Each of the Main Towns had changes that affected both the Part 1 Strategy and Part 2 Sites Plan. Full details are included in the relevant site assessment booklet, but the following is a summary:

Aylsham at Reg 19

48. By the time of the Regulation 19 publication stage in February 2021 the requirement for homes in Aylsham was increased to circa 550 homes. This was in response to work completed during autumn 2020 that took into account new evidence and emerging government policy and announcements on overall housing numbers. These included:

- New ONS 2018 household projections, which increased projected requirements in the area;
- The government consultations on the "Planning for the Future" White Paper and on "Changes to the Current Planning System". These set a clear direction for increased housing requirements nationally, with the likelihood of higher housing requirements in Greater Norwich.

49. On this basis, and through consultation with elected councillors, the strategic requirement was increased to 550 homes; but, to significantly exceed 550 homes in the plan period up to 2038 was considered unacceptable.

50. During autumn 2020, to accord with Policy 7.2, the decision was to move site GNLP0311, 0595 and 2060 from a preferred choice to an allocation to provide 250 homes and land for a new primary school. That left a choice between adding one of

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two reasonable alternatives. The decision made was to include GNLP0596R next to Norwich Road because it is better related to the town centre when compared to GNLP0336. Including GNLP0596R in the plan also presented the opportunity for a 90-bed care unit/extra care housing, and 0.25 ha for community use and to meet sustainable transport objectives.

Diss at Reg 19

51. By mid-2020 it was evident that the Diss & District Neighbourhood Plan was making good progress and preparing to allocate sites. The Regulation 18C draft in January 2020 had set a strategic requirement of 400 homes for the town. No new sites were considered appropriate to add to the plan through the site assessment process, and so Policy 7.2 remains set at 400 additional homes for Diss in addition to existing commitments of 363 homes.

52. Allowing opportunity for the neighbourhood plan tier of planning is a national and local priority. For this reason, the existing allocations of DIS1, DIS2, DIS3, DIS8 and DIS9 from the 2015 South Norfolk Site Allocations DPD are now not carried forward by the GNLP. Similarly, site GNLP0250/0342/0119/0291 that was preferred in the Regulation 18C Sites Plan is not included in the Regulation 19 and the allocation of most sites is instead devolved to the Diss & District Neighbourhood Plan.

53. A high degree of confidence exists in the Neighbourhood Plan to follow a similar timeline towards adoption as the GNLP, and that it will help fulfil the requirement set in policy 7.2 for new allocations to provide at least 400 homes.

54. The GNLP makes one allocation in Diss. The Frontier Agriculture (GNLP0102) site, which was a preferred site at the Regulation 18C stage, is now included in the GNLP publication draft. This decision was taken in consultation with elected councillors. GNLP0102 is in a highly sustainable location next to the railway station and is likely to become vacant during the GNLP plan period. This approach is considered sound and is based on the NPPF's priorities for redeveloping brownfield land and prioritising development in locations well-served by public transport.

Harleston at Reg 19

55. By the time of the Regulation 19 publication, Harleston's strategic housing requirement increased to 555 homes from 450 homes at Regulation 18C in January 2020. This change was partly prompted by a revised scheme by the promoters of GNLP2136, and, also decided upon because of new evidence from ONS household projections. The conclusion drawn was that increasing GNLP2136 from 300 homes to 360 homes and adding a 90-unit extra care housing scheme would provide for sustainable growth.

56. The choice to raise housing numbers in Harleston was taken in consultation with elected members during autumn 2020; but significantly exceeding 555 homes in the

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plan period up to 2038 was considered unacceptable. As to other development choices in Harleston, little changed from the Regulation 18C draft. GNLP2108 has moved from a preferred site to an allocation and remains an allocation for 150 homes.

57. The carried forward allocations also remain the same as at the Regulation 18C stage. HAR 4 and HAR 5 are both sites where the principle of development is accepted; and, HAR 6 and HAR 7 are sites that are recognisable parts of the employment/commercial uses on Spirketts Lane. Although it is understood that Harleston Town Council confirmed a Neighbourhood Plan Area in September 2020, the Neighbourhood Plan is at an early stage, and so the GNLP is not devolving the responsibility for site allocations to the neighbourhood level.

Long Stratton at Reg 19

58. No new allocations were preferred at the Regulation 18C consultation and that position remains the same at the Regulation 19 publication stage. A full assessment of site proposals in Long Stratton has been made, including site proposals that were not submitted until the Regulation 18C stage in 2020.

59. In consultation with elected councillors, the planning judgement made about Long Stratton is to not add new allocations. The overriding reason for this is that the scale of the existing commitment in the AAP is sufficient. As explained in policy 7.2, the deliverable commitment is 1,922 homes between 2018 to 2038.

Wymondham at Reg 19

60. The major change made for the Regulation 19 publication stage is deleting the 1,000-home contingency requirement, leaving two relatively modest new allocations. The judgement made in consultation with elected councillors during autumn 2020 was to secure the additional 5,000 homes from other sites not in Wymondham.

61. Another difference is that the 100-home proposal for GNLP0354R is allocated instead of the 50-home scheme preferred at the Regulation 18C consultation. The assessment work for GNLP0354R concluded that the expanded site could make a useful contribution to housing numbers and provide a better form of development in access terms without having significant heritage and landscape implications. The second preferred site option at Regulation 18C was GNLP3013. It remains at 50 homes and is now a proposed allocation.

62. In consultation with elected councillors, the planning judgement made about Wymondham is to not add major new allocations. The overriding reason for this is that the scale of the existing commitment in the AAP is sufficient. As explained in policy 7.2, the deliverable commitment is 2,465 homes between 2018 to 2038.

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63. Other reasons exist as to why the 1,000-home contingency at Wymondham is not required. Overall, the Part 1 Strategy has a total housing potential of 49,492 homes, and this is equivalent to providing a 22% buffer above local housing need. When choosing between a contingency site at Costessey or Wymondham, Costessey is preferable due to being at the higher settlement hierarchy tier. No commitment to more large-scale growth at Wymondham has been made at the present time. This decision has taken account of high levels of existing commitment in the town, the distance from the town centre of proposed urban extension sites, the benefits of retaining a strategic gap between Wymondham and Hethersett to prevent coalescence and the commitment in Policy 7.6 to the possibility of one or more new settlements in the next plan, two of which have been proposed through the GNLP close to the town.

Overall Housing Distribution in the Main Towns

64. The distribution of new housing in the towns at the Regulation 19 stage, along with updated delivery/commitment figures are as follows.

Main Town	Existing Commitment (including uplift and delivery since base date)	New Allocations	Total Housing 2018 - 2038
Aylsham (including Blicking, Burgh & Tuttington and Oulton)	229	550	779
Diss (including part of Roydon)	363	400	763
Redenhall with Harleston	172	555	727
Long Stratton (including part of	1,922	0	1,922

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Tharston and Hapton parish)			
Wymondham	2,465	150	2,615
Total	5,151	1,655	6,806

65. Overall, the Regulation 19 publication draft plan provides for 6,806 additional homes in the Main Towns between 2018 and 2038, which is a growth of 35% in the numbers of homes in the towns. This forms 14% of the total potential housing growth for Greater Norwich. 5,151 of the homes will come from committed sites, such as those allocated in previously adopted plans and area action plans, or those with existing planning permissions. New allocations provide for 1,655 homes, which includes two extra care housing schemes each offering approximately 90 units of accommodation.

Jobs

66. Employment land in the Main Towns is provided through committed sites, as the Employment, Town Centre & Retail Study, updated in 2020, indicates a theoretical over-supply of employment land over the Greater Norwich area.

67. The distribution of these sites across the Main Towns is shown below:

Main Town	Existing Undeveloped Employment Allocations (hectares, April 2018)	New Allocations	Total Employment Allocations 2018 – 2038 (hectares)
See polices 1 and 6 for the strategic site in Wymondham	22	0	22

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Aylsham (including Blicking, Burgh & Tuttington and Oulton)	4	0	4
Diss (including part of Roydon)	10.8	0	10.8
Redenhall with Harleston	6.8	0	6.8
Long Stratton (including part of Tharston and Hapton parish)	12.5	0	12.5
Wymondham	2.1	0	2.1
Total	58.2	0	58.2

Representations to the Regulation 19 Publication Stage

68. During the February to March publication period, there were 37 representation were made about Policy 7.2 of the Part 1 Strategy, and 186 representation were made about the Main Towns section of the Part 2 Sites Plan. Of the 37 representation about Policy 7.2, 5 were in support, and 32 raised objections. Of the 186 representation about the Main Towns element of the Part 2 Sites Plan, 14 were in support, and 172 raised objections.

69. The following is a summary of the main issues raised during the Regulation 19 consultation about Policy 7.2 in the Part 1 Strategy, and is organised by settlement.

Representations for Policy 7.2 about Aylsham

70. Opposition from the Town Council and residents about both the site allocations and the process for their selection, focussing primarily on the addition of the Norwich

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Road site (GNLP0596R) being an increase of 83% in new homes from Reg.18 to Reg.19. Arguments against the allocation of 550 homes include:

- Pressures on infrastructure – on schools, doctors, highways, parking, water supply and sewerage;
- The lack of public consultation and engagement with the town council between Regulation 18C and Regulation 19 leading to the conclusion that the GNLP should be withdrawn and re-consulted upon.

71. Support from a development promoter in Aylsham for the policy as written states that it is consistent with para. 72 of the NPPF.

Representations for Policy 7.2 about Diss

72. Site promoters state that:

- Allocations in Diss are disproportionately low compared to other Main Towns;
- Housing allocations, including for older people's housing, should not be devolved to the Neighbourhood Plan;
- The GNLP should have addressed perceived highways constraints, as opposed to using this matter to limit growth in a highly sustainable town.

Representations for Policy 7.2 about Harleston

73. No significant issues were raised.

Representations for Policy 7.2 about Long Stratton

74. Land promoters argue that the existing strategic allocation may not be deliverable and the GNLP should include a trigger for a review of allocations if the funding bid for the by-pass is unsuccessful.

Representations for Policy 7.2 about Wymondham

75. Support from the promoters of Silfield Garden Village (SGV) for the approach as drafted limiting piecemeal 'edge' growth. It is argued that the SGV would enable:

- protection the strategic gap between Wymondham and Hethersett and
- mitigating recreational pressure on the Lizard County Wildlife Site by the provision of a new Bays River Park.

76. Challenges from promoters of sites on the edge of the town include:

- 'mixed messages' with contingency sites included in Reg. 18C;
- the low level of growth is contrary to the town's inherent sustainability and location on the A11 Cambridge to Norwich Tech Corridor;

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- further growth would be supported by improvements to water capacity proposed by Anglia Water and improved access to the railway station;
- ‘rolling over’ the existing strategic gap policy to Hethersett without a new assessment is unsound;
- the development strategy for Wymondham effectively ends by 2030 on the basis that most AAP allocations will be completed by 2026, with approximately 500 dwellings to be delivered beyond that date.

77. The following is a summary of the main issues raised about the Main Towns element of the Part 2 Sites Plan and is organised by settlement.

Representations for Aylsham Sites

78. Main points made about the site allocations were:

- Substantial objections from 65 residents, as well as Aylsham Town Council concentrating on the addition of GNLP0596R, and the increase in housing requirement to 550 new dwellings, without further consultation prior to progressing to the Regulation 19 stage. The soundness of the GNLP is challenged in respect of its evidence and the justification for the housing allocated. Issues raised included the demands on infrastructure such as highways, education provision and sewerage capacity.
- An objection from the promoters of site GNLP0336 west of A140 who argue for the inclusion of their site, by virtue of the assessment process being flawed and failing to take account of a variation of their proposal that would provide 150 homes instead of 300 homes.
- In relation to GNLP0596R on Norwich Road, the promoter has reiterated support for the site’s allocation, whilst clarifying that the policy should be amended to exclude pedestrian connections via Copeman Road. In relation to the allocation of site GNLP0596R, Historic England raises the potential impact on the nearby Grade II Diggins Farmhouse, suggesting it is a matter for investigation prior to the GNLP’s submission. A minor modification put forward by Anglian Water is to amend the policy wording of GNLP0596R to allow for access to maintain the foul drainage infrastructure running through the site.
- In relation to GNLP0311/0595/2060 on Burgh Road, the promoter has reiterated their support for the allocation, whilst suggesting only minor modifications. These are to reduce the carriageway width along the frontage from 6m to 5.5m, and to clarify that their obligation is to provide land for the school (and not the school itself). A minor modification is put forward by Anglian Water to safeguard access for the maintenance of the water supply, foul and surface water drainage infrastructure that runs through the site.

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Representations for Diss Sites

79. Main points made about the site allocations were:

- Objections from promoters that focus upon the strategic growth figure for Diss, and the devolution of site allocations to the Neighbourhood Plan. Sites in question include: DIS1, DIS3, GNLP0250/0342/0291, GNLP0599, GNLP1044, and GNLP1045.
- The ambition of Diss Town Council is reiterated that a footway/cycleway is achieved as part of GNLP01022 northwards to join Frenze Hall Lane.

Representations for Harleston Sites

80. Main points made about the site allocations were:

- Minor modifications are put forward by Anglian Water to allocation policies GNLP2108, GNLP2136, HAR 4, HAR 5, and HAR 6 to safeguard access for the maintenance of the water supply, foul and surface water drainage infrastructure that runs through the sites.
- A development promoter wishes to see the settlement boundary to the south of Harleston redrawn around GNLP2109 and GNLP2136.

Representations for Long Stratton Sites

81. Main points made were:

- The strategic approach to Long Stratton should be changed, with promoters arguing for inclusion of their site GNLP0354, GNLP4033, and GNLP4034.

Representations for Wymondham Sites

82. The main points made about the site allocations were:

- The strategic approach to Wymondham should be changed, with promoters arguing for inclusion of their site, such as GNLP006 (north Wymondham) and GNLP0320 (south of Gonville Hall Farm).
- A generic comment from the Environment Agency (EA) for all Wymondham site allocations that the latest version of the Water Cycle Study shows that Wymondham Water Recycling Centre (WRC) will be over capacity post growth. The EA argues that the latest findings and recommendations from the WCS should be incorporated and reflected in the Local Plan. This is the case for Wymondham as policy 4, in combination with and its supporting appendix 1, which specifically identifies the need for additional capacity at the WRC.

83. All the representations made during the Regulation 19 Publication stage have been considered. In some limited circumstances it is acknowledged that some minor

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modifications could be made, such as to correct minor factual inaccuracies or to aid clarity. But none of the representations undermine the soundness of the plan.

Conclusions

84. The number of homes on newly allocated sites across Main Towns is 6,806 and this is broadly in line with the range identified in the Growth Options consultation, the ranges from the Growth Options being from 6,018 to 7,118 homes.
85. In 2018, the housing stock in the Main Towns was 19,400 homes, and the additional of 6,806 represents a 35% increase. In terms of the overall potential housing growth in Greater Norwich of 49,492, 14% of the proposed housing growth is being directed to the Main Towns.
86. Of the 187,500 homes in the plan area, 10% of the existing homes are in the Main Towns. Directing 14% of housing growth to the Main Towns is considered compatible with these settlements being important service centres and centres of employment that also provide services for their wider hinterlands.
87. The distribution of new allocations across the Main Towns varies, reflecting different constraints facing each town, their strategic locations and the existing undeveloped commitment from previously adopted local plans or sites with planning permission.
88. The plan does not make new allocations for employment/commercial uses; but, does carry forward several existing allocations. These are: AYL3 and AYL4 in Aylsham; and, HAR 6 and HAR 7 in Harleston. In Diss employment allocations are devolved to the Neighbourhood Plan. For Long Stratton and Wymondham employment land is secured by their respective Area Action Plans, which the GNLPP is not superseding.

Appendices

Appendix 1: Full Text of Policy 7.2

Appendix 2: Map of Main Towns Housing Growth

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Appendix 1: Full Text of Policy 7.2

Policy 7.2 The Main Towns

The Main Towns of Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham will continue to be developed to enhance their function as attractive places to live and providers of employment and services to serve the towns and their hinterlands, with substantial levels of development expected to take place. This will provide for around 6,850 additional homes and sites for employment and commercial land and related infrastructure.

The identified levels of development, including growth committed in the Long Stratton and Wymondham Area Action Plans, are:

Housing

Main Town	Existing deliverable commitment (including uplift + delivery 2018/19 and 2019/20)	New allocations	Total deliverable housing commitment 2018 - 2038
Aylsham	229	550	779
Diss (with part of Roydon)	363	400	763
Harleston	172	555	727
Long Stratton	1,922	0	1,922
Wymondham	2,465	150	2,615
Total	5,151	1,655	6,806

Other residential development will be acceptable elsewhere within settlement boundaries subject to meeting the criteria of other policies in the development plan.

Employment

Main Town	Existing undeveloped employment allocations (hectares, April 2018)	New employment allocations (hectares)	Total employment allocations (hectares)

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See policies 1 and 6 for the strategic site in Wymondham	22	0	22
Aylsham	4	0	4
Diss (with part of Roydon)	10.8	0	10.8
Harleston	6.8	0	6.8
Long Stratton	12.5	0	12.5
Wymondham	2.1	0	2.1
Total	58.2	0	58.2

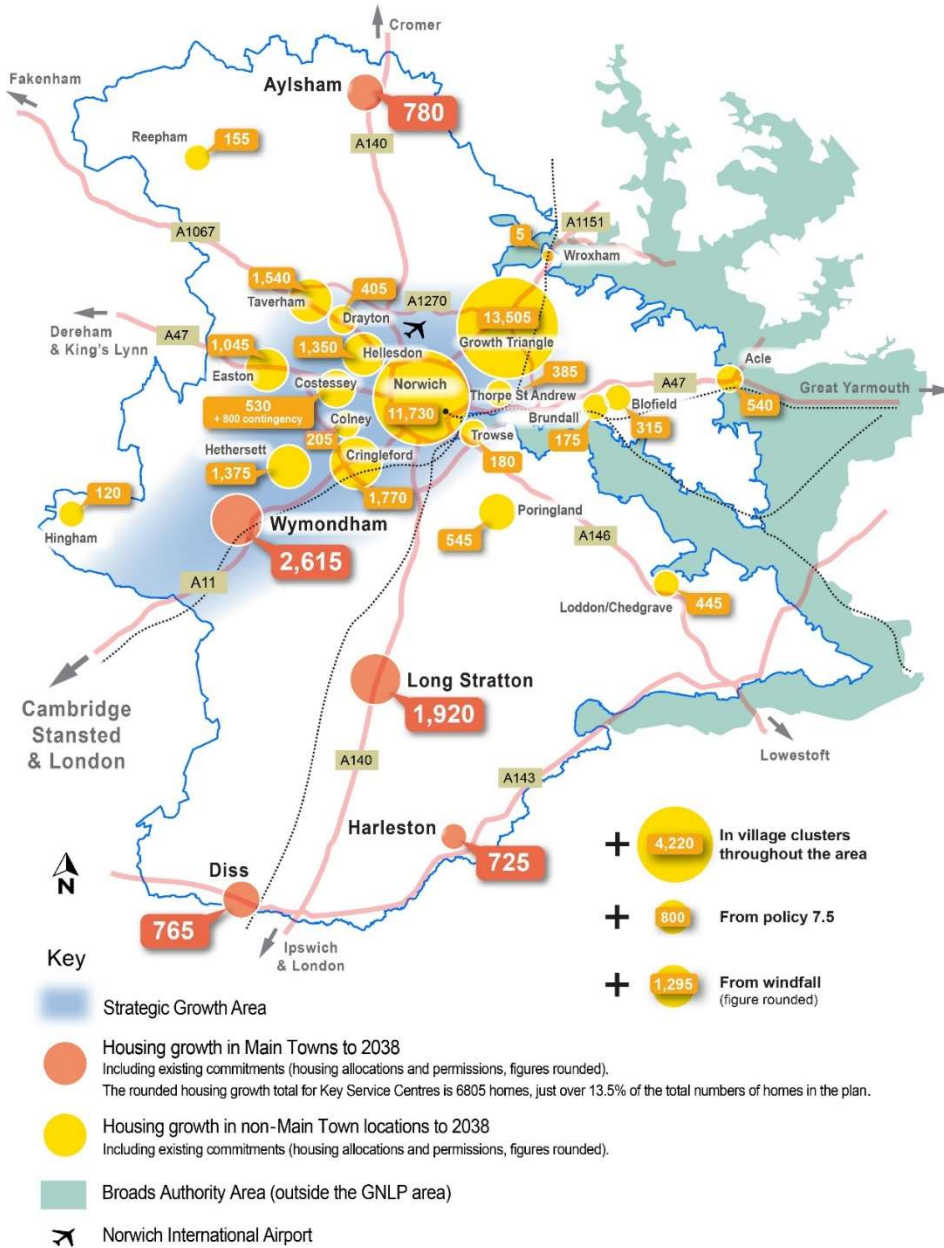
Other small-scale employment development will be acceptable in principle elsewhere in the towns subject to meeting other policies in the development plan.

Retail and other town centre type uses should be located in or adjoining the town centres. Proposals which support speciality and independent shopping, small-scale retailing and diversification of services and facilities will be encouraged.

Enhancements to the multi-functional green infrastructure network will be provided by development to contribute to the strategic network as set out in maps 8A and B and to linking local networks.

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Appendix 2: Map of Main Towns Housing Growth Main Towns Housing Growth



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