

## GREATER NORWICH LOCAL PLAN EXAMINATION

### INSPECTORS' INITIAL QUESTIONS

#### Partnership Response – Updated November 23<sup>rd</sup> 2021

1. This response sets out the Greater Norwich Partnership's answers to the Initial Questions asked by the Inspectors in their note ([D1.1](#) on the examination website) on the Greater Norwich Local Plan (GNLP) examination.
2. This more detailed response follows a letter sent to the Inspectors to outline the timescales ([D1.2](#)) for this work. As the letter covered the issues and questions raised in paragraphs 1 to 4 of the Initial Questions from the Inspectors, the first response below is to question 5.
3. As far as is possible, this response provides full and direct answers to the Initial Questions. In some cases, as allowed for in the Inspectors' note, we set out where staged responses will be required and when they will be delivered. This version of the response includes updates as of November 23<sup>rd</sup> 2021. The updates provide:
  - a. links to the document library;
  - b. links to revisions to the housing trajectory relevant to question 13;
  - c. a revised response to question 18 explaining that the majority of the Statements of Common Ground have been published on the examination website;
  - d. additional information on East Norwich in revised responses to questions 21 and 22 following the Norwich City Council Cabinet meeting on November 17<sup>th</sup>.
4. We look forward to receiving the Guidance Note and the Matters, Issues and Questions. If there are any further queries about our responses, please do not hesitate to contact the GNLP team.

#### **Duty to Co-Operate**

**Question 5.** In its response to the Regulation 19 submission, Breckland District Council says that the Duty to Co-operate has not been met. The Duty to Co-Operate Statement published by the Partnership in July 2021 says that information regarding Breckland District Council is awaited. Can the Partnership please provide evidence that the Duty to Co-Operate has been met, ideally through a statement of common ground with Breckland District Council?

#### **Response**

5. At the time of submitting the Draft Duty to Co-operate Statement in July 2021 a Statement of Common Ground (SoCG) with Breckland District Council was being produced but had not been finalised. The SoCG has now been agreed. A revised Duty to Co-operate Statement containing the SoCG with

Breckland District Council is in the evidence base ([A9.1](#) – see Appendix 3). The SoCG confirms that there are no outstanding Duty to Cooperate issues with Breckland District Council.

### **Consultation**

**Question 6.** In some of the representations made, it is alleged that a number of Town and Parish Councils, and those who had previously commented on the draft Local Plan at Reg 18 stage, were not notified of the Reg 19 consultation. Please could the Partnership clarify the position?

### **Response**

6. The Partnership is confident that all Town and Parish Councils were notified at each stage of plan preparation including Regulation 19. We emailed them all directly at each consultation stage.
7. The Partnership is also confident that all people who had previously commented on the draft Local Plan at the Regulation 18 stage were notified of the Regulation 19 consultation. We have not been made aware of any specific examples where this has not happened. At each stage of consultation, we not only notified people on our consultation database, but also used a variety of other methods of engagement including press notices, our website and social media. When contacting people on our database it is usual to receive a number of bounce back emails and we have tried to find alternative ways to contact these people where possible.

### **Sustainability Appraisal (SA)**

**Question 7.** Each of the ‘reasonable alternatives’ identified in the Sustainability Appraisal for the housing requirement include a 20% delivery buffer (which includes the windfall allowance in some scenarios). In our view, the Sustainability Appraisal should also model both smaller and minimal supply buffers as ‘reasonable alternatives’. Please could the Partnership prepare an addendum to the Sustainability Appraisal to address this point.

### **Response**

8. Production of an addendum to the SA has been commissioned. This will assess smaller (10%) and minimal (1%) supply buffers as ‘reasonable alternatives’. It is expected that the addendum will be available to submit to the examination by 26<sup>th</sup> November 2021.

### **South Norfolk Village Clusters Housing Site Allocations Plan (VCHAP)**

**Question 8.** Why has the decision been taken to produce a separate allocations plan for some villages in South Norfolk rather than making allocations within the GNLP?

### **Response**

9. The approach to village clusters is clearly set out in the GNLP Strategy ([A1](#)). Paragraph 188 of the submitted plan highlights that:

*The approach to village clusters is innovative. It reflects the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages.*

10. Clusters are defined using the catchments of rural primary schools as a proxy for very local social geography, sustaining not only the schools themselves but also the social connections that drive local village life and community halls, bus services, leisure facilities etc, as well as supporting the local economies of the clusters.
11. This has allowed the GNLP to create an appropriate and proportionate strategy with the opportunity for each village cluster to participate in limited smaller-scale rural development, as part of a balanced strategy for accommodating growth across the three authorities. Proportionately the level of growth in the clusters is notably smaller than the percentage of the population that already lives in these locations; 9% of the overall housing growth, compared to almost 25% of the current population (see Table 7 of the submitted GNLP Strategy ([A1](#))). Without this modest level of growth some of the services and facilities that support that rural population would be at risk.
12. The village clusters approach brings wider choice to the housing market, including for those who wish to use the opportunities for new ways of working and advancing technology to reduce their need to travel, as well those existing residents within the clusters who have changing housing requirements. It will also aid the diversity of developers within the market, and consequently the variety of housing available.
13. Within this overall framework, paragraph 30 of the submitted GNLP Strategy ([A1](#)) identifies the differing geographies of the rural areas in South Norfolk and Broadland, stating:

*South Norfolk has twice as many parishes as neighbouring Broadland, more market town catchments (including around Beccles and Bungay in Suffolk), significantly less urban fringe, and a substantially larger rural territory. Rural South Norfolk includes two key strategic employment areas, at Hethel and Wymondham, and has a number of villages associated with the Cambridge Norwich Tech Corridor.*

14. The Policy 7.4 Village Clusters topic paper ([D3.12](#)) reiterates the above and provides further explanation of the reason for producing the separate site allocation plan. Paragraph 38 states:

*Shortly prior to consultation on the Regulation 18, Stage C Draft Plan the decision was taken at a member level to remove the village clusters sites in*

*South Norfolk from the Sites part of the GNLP, although an overall minimum number of houses to find for the South Norfolk villages was to remain in the strategy document. This change was documented in papers to the GNDP Board on 6 January 2020 which stated that **as further work would be required to find suitable sites for housing in smaller villages across South Norfolk to support local schools, shops, pubs and post offices without overwhelming local services and facilities South Norfolk Council therefore intended to prepare a South Norfolk Village Clusters Housing Allocations Plan (VCHAP).***

15. In relation to the significantly smaller urban fringe area in South Norfolk and its substantially larger rural territory, paragraph 39 of the topic paper also identifies that the GNLP carries forward the JCS strategy which promotes modest levels of development in more villages in South Norfolk than Broadland, stating:

*This is also reflected in the existing JCS, which identifies 45 Service Villages and 33 Other Villages in South Norfolk and only 15 and 6 respectively in Broadland.*

16. Further to this, with over 60 smaller settlements in South Norfolk, a unique opportunity exists to diversify the market to SME housebuilders and local supply chains, bolstering overall delivery. Increasing opportunities for smaller builders will widen the economic opportunities and benefits, particularly in terms of local employment in rural locations; such builders are also often more responsive in terms of tailoring designs to the characteristics of the area, bringing genuine choice to the market. Smaller developments are more relevant to the smaller builders who typically spend more time on design, engage local tradesmen and use smaller scale supply chains. Consequently, given the greater extent, numbers of settlements and the relative complexity of rural South Norfolk, it was felt that more time was needed to investigate the opportunities for growth in village clusters; including using the VCHAP Regulation 18 consultation to seek further sites, but without delaying progress on the GNLP.
17. The separate approach being pursued within the South Norfolk VCHAP enables as many village clusters as possible to contribute to meeting general and local housing needs, reflected in the GNLP housing target, whilst helping to support and sustain the local services that are essential to securing sustainable futures for rural communities. This outcome could not have been achieved as effectively across South Norfolk without the further investigation and exploration that is afforded through the production of the South Norfolk VCHAP.
18. Whilst not of itself a determinative factor, it is notable that the effects of Covid-19 resulted in a material change in the desirability of properties in village locations, with access to greater amounts of open space. Villages often

surround Market Towns and Key Service Centres and there are more of these local centres in South Norfolk than neighbouring districts.

19. Whilst the full extent of the restrictions associated with Covid-19 may be a temporary event, the shift to working from home enabled by faster and more reliable broadband is likely to meaningfully impact on patterns of work over the longer term, with a reduced need to travel to central locations so often. This means that increased demand for more rural properties may well continue into the future.

**Question 9.** What are the implications for the GNLP if the VCHAP gets delayed, or is not able to allocate sites for 1200 new homes which can be delivered within the plan period?

**Response**

20. Paragraph 41 of the Policy 7.4 Village Clusters topic paper ([D3.12](#)) states

*The intention is to progress the South Norfolk plan as quickly as possible and since it is separate to the GNLP, it will not delay the GNLP's progress. The South Norfolk VCHAP is currently progressing, and a Regulation 18 draft consultation took place from 7<sup>th</sup> June to 2<sup>nd</sup> August 2021. The draft plan has identified preferred option sites, which together with the two Neighbourhood Plans making allocations in the Village Cluster areas, exceed 1,200 homes. The draft plan also included reasonable alternatives and invited the submission of further potential sites. This shows that the GNLP Policy 1 requirement for a minimum of 1,200 homes in the South Norfolk village clusters is appropriate.*

21. To provide further detail:

- South Norfolk Council has resourced and progressed the South Norfolk Village Clusters Housing Site Allocations Plan (VCHAP) document quickly. The timetable for the production of the VCHAP is set out in the South Norfolk Local Development Scheme, which will be kept under review as part of the plan making process. It is clear from progress made to date that the adoption of the VCHAP should be achieved well in advance of government's December 2023 deadline.
- Further updates on the progress of the VCHAP will be provided to South Norfolk's policy development committees as part of the plan making process, in the lead up to and during the examination process. Copies of these reports can be provided as necessary to provide further clarity on the progress of the plan.
- The Regulation 18 consultation on the VCHAP itself included an assessment of the circa. 450 sites proposed through the call-for-sites and identified preferred sites, which along with the Village Cluster parishes in

the Diss and District and Dickleburgh Neighbourhood Plans, will accommodate in excess of 1,200 dwellings. The VCHAP also identified a number of other shortlisted sites which could be considered as alternatives to the preferred sites should this be necessary as an outcome of the Regulation 18 consultation.

- The Regulation 18 consultation generated a strong response with over 2,000 comments received from approximately 800 individual respondents. In addition, over 60 further potential development sites were submitted for assessment.

22. Consequently, there is a high degree of confidence that the South Norfolk VCHAP will be finalised and become part of the development plan in 2023. Furthermore, the Regulation 18 draft plan shows strong evidence that the plan will meet the required housing provision in accordance with the GNLP.
23. As such there is no reason to conclude that there will be a significant delay in allocating sites through the VCHAP or that it will fail to provide the required amount of homes. However, it is in fact the case that even if the VCHAP were to be significantly delayed, or does not identify sufficient housing sites, this would not result in significant consequences for delivering the overall GNLP strategy.
24. Firstly, although important to helping to meet needs in South Norfolk villages, the homes to be allocated through the VCHAP provide only an element (approximately 5.5%) of overall housing provision in Greater Norwich. The GNLP includes a significant buffer which could help to address any losses from any source.
25. Secondly, in the short-term housing in South Norfolk villages is currently being delivered through the significant pipeline of development sites that are already allocated in the adopted development plan or which benefit from an extant planning permission. The scale of the current pipeline was calculated as being 1,392 homes at the 2018 base date of the GNLP and strong progress continues to be made with the delivery of these sites. The VCHAP will help to ensure that medium and longer-term needs can be met.
26. In the extremely unlikely event that the VCHAP were not for any reason delivered, the shortfall in housing provision required by the GNLP in South Norfolk's villages would be a material consideration for the purposes of decision making on planning applications for housing. Whilst it is of course the case that not all speculative applications would be appropriate in planning terms, it is expected that this eventuality would generate an additional source of windfall housing that would further mitigate any minimal impact delivery of the GNLP housing requirement that would result.

## **Neighbourhood Plans**

**Question 10.** Can the Partnership provide an update on the progress of neighbourhood plans being prepared within the GNLP area?

### **Response**

27. The situation concerning Neighbourhood Plans (NPs), as at publication of the Regulation 19 GNLP, is set out in Appendix 4 to the GNLP Strategy ([A1](#)).
28. Four NPs have been “made” in Broadland/South Norfolk since the GNLP Regulation 19 Publication. These are at Taverham, Spixworth, Poringland and Long Stratton. The complete list is below:

Parish	Authority	Date Made	End Date
Acle	BDC	February 2015	2026
Aylsham	BDC	July 2019	2038
Blofield	BDC	July 2016	2036
Brundall	BDC	May 2016	2026
Drayton	BDC	July 2016	2026
Gt & Lt Plumstead	BDC	July 2015	2034
Hellesdon	BDC	December 2017	2026
Horsford	BDC	July 2018	2038
Old Catton	BDC	July 2016	2035
Rackheath	BDC	July 2017	2037
Salhouse	BDC	July 2017	2026
Sprowston	BDC	May 2014	2026
Strumpshaw	BDC	July 2014	2026
Wroxham	BDC	March 2019	2039
Cringleford	SNC	January 2014	2026
Easton	SNC	December 2017	2042
Mulbarton	SNC	February 2016	2030
<b>Taverham</b>	<b>BDC</b>	<b>July 2021</b>	<b>2040</b>
<b>Spixworth</b>	<b>BDC</b>	<b>July 2021</b>	<b>2039</b>

<b>Poringland</b>	<b>SNDC</b>	<b>July 2021</b>	<b>2039</b>
<b>Long Stratton</b>	<b>SNDC</b>	<b>October 2021</b>	<b>2036</b>

29. In addition, as of 27 October 2021, there are now 6 qualifying bodies in Broadland which have designated their neighbourhood plan area and 10 in South Norfolk. This means they have committed to developing an NP. The table below sets out the progress of these. Five of these NPs have recently reached the Regulation 14 consultation stage. A further parish in South Norfolk is understood to be progressing an NP but has not yet designated the neighbourhood area. In Norwich a Neighbourhood Area was designated, but this is not currently being progressed.

<b>Parish</b>	<b>BDC Grant Application</b>	<b>NA* Submitted</b>	<b>NA Adopted</b>	<b>Reg. 14 Consultation</b>
<b>Thorpe St Andrew<sup>1</sup></b>		23/03/2017	28/04/2017	28/06-10/08/2021
<b>Horstead<sup>1</sup></b>	Mar-18	27/06/2016	22/08/2016	
<b>Buxton with Lamas</b>		26/03/2018	10/04/2018	
<b>Guestwick</b>		26/02/2018	11/05/2018	
<b>Reedham<sup>1</sup></b>		04/04/2019	26/04/2019	
<b>Lingwood &amp; Burlingham</b>		22/09/2021	29/09/2021	
<b>Diss &amp; District</b>		01/06/2017	Jun-17	23/06-18/08/2021
<b>Starston</b>		13/07/2018	Aug-18	09/07-30/08/2021
<b>Tivetshalls</b>	Y	08/07/2020	Jul-20	15/09-01/11/2021
<b>Redenhall w. Harleston</b>		22/09/2020	Sep-20	24/07-10/09/2021
<b>Dickleburgh</b>		13/03/2017	May-17	
<b>Trowse</b>	Y	09/11/2019	Nov-19	
<b>Wymondham</b>	Y	27/03/2020	Mar-20	
<b>Tasburgh</b>	Y	19/05/2020	May-20	

Shotesham		06/10/2020	Oct-20	
Hingham		16/09/2021	Oct-21	

**Question 11.** The Diss and area Neighbourhood Plan is expected to identify sites for around 250 homes. What are the implications for the Local Plan if the neighbourhood plan does not progress or does not identify sites for 250 homes which can be delivered within the local plan period?

## Response

30. Explanation on the Diss and area Neighbourhood Plan is provided in the GNLP Sites Plan ([A2](#)):

4.20 *With the exception of one site, decisions on the allocation or reallocation of development land in Diss are devolved to the neighbourhood planning process. The proposed Diss & District Neighbourhood Plan is a cross boundary plan covering parishes located within both the South Norfolk and Mid-Suffolk districts. The parishes included in the production of the Neighbourhood Plan are: Brome and Oakley, Burston and Shimpling, Diss, Palgrave, Roydon, Scole and Stuston. Progress on the neighbourhood plan is good. 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.*

4.21 *The one allocation to be made in Diss via the GNLP is the Frontier Agriculture site on Sandy Lane. This is an established business that has expressed its long-term ambition to relocate, most likely towards the end of the plan period. The brownfield status of the land along with its proximity to the town centre, railway station, and local bus routes, makes it an exceptional opportunity for higher density brownfield redevelopment. Such brownfield sites are prioritised in national planning policy to make effective use of land, particularly where they are well located in relation to public transport and within walking and cycling distance of a good range of employment, services and facilities.*

4.22 *In addition to existing commitments, a housing requirement of at least 400 new homes is set by the GNLP for the town of Diss, part of which is fulfilled by the allocation of Frontier Agriculture for 150 homes. The Diss & District Neighbourhood Plan will have to fulfil the remaining overall housing requirement, but otherwise has freedom within the statutory framework to make its own choices. In addition to the strategic requirement for 400 new homes, there are three carried forward allocations providing for 122 new homes, 137 homes were delivered April 2018 to March 2020 and a total of 95 additional dwellings with planning permission.<sup>2</sup> This gives a total deliverable housing commitment for Diss (including part of Roydon) of 754 homes between 2018-2038".*

31. A footnote to this text states: *"<sup>2</sup>For the purposes of calculating housing commitment it is assumed existing allocations from the South Norfolk Site Allocations DPD 2015 will be carried forward, but this is a matter for the Neighbourhood Plan to decide upon"*.
32. The housing requirement to be met through the Neighbourhood Plan for Diss is 400 -150 (allocated in the GNLP) = 250 homes, plus 122 homes that were allocated in the existing South Norfolk Local Plan (and part of the housing commitment figure in the GNLP), giving a total of 372 homes.
33. As the Neighbourhood Plan includes some parishes adjoining Diss (Burstons & Shimpling, Roydon and Scole in South Norfolk district; and Brome & Oakley, Palgrave and Stuston in Mid-Suffolk district) the plan has proposed housing allocations in some of those villages. Any such allocations in the South Norfolk villages would have been provided for through the proposed South Norfolk Village Clusters Housing Sites Allocation Plan (i.e. part of the 1200 homes to be provided in that Plan), and not through the GNLP. An indicative figure of 25 additional homes was provided by South Norfolk Council for each of the three South Norfolk villages.
34. The latest proposals (Regulation 14) in the Neighbourhood Plan for Diss include new allocations for 265 homes on 5 sites and "carried forward" allocations of 104 homes on 5 sites. This gives a total of 369 homes allocated, just under the 372 homes figure required for Diss under the GNLP. In the three South Norfolk villages allocations for a total of 101 homes are proposed, exceeding the 75 homes that would have been expected under the South Norfolk Village Clusters Housing Sites Allocation Plan.
35. Production of the Neighbourhood Plan has progressed well. A Regulation 14 pre-submission consultation on a draft Neighbourhood Plan took place between June and August 2021.
36. It is likely that there will shortly be a further focussed consultation relating to changes to a proposed allocation in one of the villages, followed by the submission of the plan to South Norfolk Council in January 2022. This would likely lead to a Regulation 16 consultation in March/April 2022, examination between May-July 2022 and a potential referendum in Sept/Oct 2022. This timescale would be dependent on the decision-making timescales at both South Norfolk and Babergh & Mid-Suffolk Councils.
37. Consequently, there is a high degree of confidence that the Diss and Area Neighbourhood Plan will be finalised and become part of the Development Plan in autumn 2022. Also, it is expected that the Neighbourhood Plan will meet the required housing provision in accordance with the GNLP.

38. Nevertheless, if the Neighbourhood Plan did not progress or did not identify sufficient housing sites, this would not result in significant consequences for the GNLP. The housing requirement to be addressed through the Neighbourhood Plan is only a minor part of the overall provision that is made through the GNLP. In addition, housing provision within the GNLP has included a significant “buffer” above the actual identified housing need. This should be more than sufficient to accommodate any shortfalls in overall provision that might arise from a failure of the Neighbourhood Plan.
39. There would be the potential for implications at the local level, with the possibility of housing needs not being met locally. However, a shortfall in housing provision in the Diss area caused by a failure in the Neighbourhood Plan would be a material consideration to be taken into account by the local planning authority in the determination of planning applications for housing.
40. Also, if necessary, the authority could produce a focussed local plan that dealt specifically with identifying sites to make adequate provision for housing. Such a Plan would be able to utilise work that had already taken place on the GNLP and the intended Neighbourhood Plan and so be able to be completed in a short timescale.

## **Housing**

**Question 12.** The housing policy figure includes an upward adjustment of around 9000 new homes 2018 -2038 when compared to the requirement identified by the 2014 based household projections. Paragraph 178 of the submitted Local Plan states that the potential growth indicated by the 2018 based projections would equate to the identification of an additional 5000 homes. The proposed policy adds another 4000 on top of that. Can the partnership direct us to the evidence which provides justification for this level of additional provision beyond the housing requirement?

## **Response**

41. The authorities are committed to delivering on housing need and economic growth. Consequently, the GNLP includes a delivery buffer equating to an uplift in housing provision of roughly 10% above local housing need (i.e. around 4,000 additional dwellings). This delivery buffer will help ensure that needs are met even if some sites have unexpected delays. The plan also provides additional flexibility to allow higher levels of growth to be delivered, the potential need for which is indicated by the 2018-based household projections.
42. Using the standard methodology but with these projections indicates a potential requirement of 45,180 dwellings or 4,640 additional dwellings over the GNLP’s local housing need. This figure is rounded up to 5,000 dwellings to aid potential delivery. This additional flexibility also provides for enhanced economic growth, supporting the aims of the City Deal.

43. Overall, the GNLP approach supports and is consistent with the government's aim to substantially increase the supply of homes. This explanation is set out in more detail in the Policy 1 Growth Strategy Topic Paper and in particular its Appendix 3 "Housing numbers in the GNLP" ([D3.2](#)).

**Question 13.** The submitted Local Plan includes a housing trajectory from 2018/19 to 2037/38. The Homes Topic Paper includes an appendix which sets out the housing delivery forecasts for each of the three local authority areas. These three tables do not appear to be necessarily consistent. For example, the Norwich area table includes references to 'in-commitment' sites whereas the other two tables do not. In addition, there are no housing figures set in the 'in-commitment' rows. Can the partnership provide clarity on these matters please?

### Response

44. The GNLP Strategy ([A1](#)) housing delivery trajectory is in its Appendix 6. It shows a total housing potential of 49,492. The trajectory was prepared in November 2020.
45. Given the time elapsed an updated trajectory, prepared in August 2021 and now revised in November 2021, is in Appendix 4 ([D3.2B](#)) of the Policy 1 Growth Strategy Topic Paper (rather than the Policy 5 Homes Topic Paper referred to in the question). The November 2021 updates reflect a range of issues summarised in paragraphs 3 and 7 of document [D3.2B](#), most notably the inclusion of housing completions data from 2020/21 and clarification on how student accommodation numbers are calculated. The trajectory now shows a higher total housing potential of 50,307. This increase of just over 800 homes from the submitted plan is due to variations in how schemes evolve as they proceed from allocations to permissions and to changes to reflect updates to the 5-year land supply statement, for example in how housing number equivalents generated by the delivery of student accommodation are calculated.
46. The updated spreadsheet ([D3.2C](#)), which is part of Appendix 4 of the Policy 1 Growth Strategy Topic Paper, consists of a site-by-site housing trajectory organised by district council area. It includes new allocations, existing allocations and sites with planning permission and is partly based on the 5 Year Land Supply Statement.
47. Column B of the spreadsheet distinguishes between new GNLP allocations and commitment sites which are derived from existing allocations or planning permissions.

48. References to ‘in-commitment’ sites” included in column E for Norwich refer to allocations that gained planning permission prior to the decision to allocate them. To avoid double counting, the growth to be delivered at these sites is included in separate rows in the commitment section of the spreadsheet. In Broadland and South Norfolk, no new allocations already had planning permission.

**Question 14.** Can the Partnership please confirm that there is a common consistent system of completion data monitoring and collection across the Plan area?

**Response**

49. Joint monitoring has taken place since adoption of the JCS in 2011. The 2019/20 Annual Monitoring Report (AMR) ([D1.4D](#)) includes monitoring of strategic indicators, including housing completions, to assess the implementation of policies in the JCS.
50. We confirm that a common consistent system of housing and other completion data monitoring and collection is used for the joint AMR across the Plan area. The methodology used for housing completions identifies units that have reached practical completion using building control inspection data, site visits and desk top studies.
51. The current housing delivery data reported in the AMR does not include student accommodation and communal accommodation completions. The AMR monitors performance against the JCS housing requirement which does not include student and communal accommodation needs, therefore the monitoring of housing completions does not include such development. Consequently, the delivery figures including student and communal accommodations are included in the explanatory text of the AMR, but not in the delivery table itself. This is consistent across the area.
52. Appendix 3 of the GNLP Strategy ([A1](#)) sets out the proposed future monitoring framework. It provides 49 indicators to monitor the implementation of the GNLP, divided up by plan objectives. The intention is to continue to produce a joint AMR using a common consistent system of completion data monitoring and collection across the Plan area. The JCS indicators will be replaced by those in appendix 3 of the GNLP. Due to changes to national policy since the JCS was adopted, housing completion data will include student and communal accommodation at the nationally established discounted rate.

**Question 15.** The GNLP proposes to re-allocate a number of sites that were previously allocated for housing under previous plans. In what year were these sites originally allocated? Why have they not come forward as originally envisaged?

**Response**

53. Paragraphs 23 to 25 and appendix 4 of the GNLP Strategy ([A1](#)) identify which current plans the GNLP will supersede, along with those plans which it will not replace (including Area Action Plans for Long Stratton, Wymondham and the Growth Triangle and Neighbourhood Plans). The text explains that the JCS and the Site Allocations Plans in each of the three districts will be superseded on adoption of the GNLP and that “*The great majority of the undeveloped sites in the Site Allocations plans are re-allocated through the GNLP.*” Footnote 5 states that this is subject to evidence that these sites will be delivered by 2038.
54. The dates of allocation of sites in the different site allocation plans are set out in the table below. We are only part way through the timescale from adoption to the end of the plan period. These plans remain in place until superseded by the GNLP.

Plan	Year of Adoption	End date
Broadland Site Allocations Development Plan Document	2016	2026
Norwich Site Allocations and Site-Specific Policies Local Plan Document	2014	
South Norfolk Local Plan Site Specific Allocations and Policies Document	2015	

55. Many of the sites allocated through these plans have come forward as envisaged. As reported in the AMR 5-year housing land supply, 364 homes were built out in 2020/21.
56. 2,959 homes from the site allocation plans (see the table below) already have, or are being taken towards, planning permission and are included in the 5-year land supply. The 5-year land supply sites were recently tested and agreed at a planning appeal (see the Becket’s Grove, Wymondham appeal decision ([D1.4B](#)) in May 2021 and appendix 2 of the subsequent local planning authority statement ([D1.4C](#)) for further detail). The sites highlighted in blue in the table below are included in the 5-year land supply but do not currently have consent. These will provide 355 homes.
57. Some of the larger sites will deliver homes up to, during and after 2026, so are shown in both tables below.
58. More detail on the above sites is provided in the accompanying spreadsheet ([D1.3A](#)).
59. Taking account of this evidence, there is strong likelihood that the homes in the table below will be delivered by 2026.

### Sites and Homes from Site Allocation Plans to be delivered by 2026

Hierarchy	Allocation Reference	Homes to be delivered by 2026
Norwich	CC3, CC11, CC16, R13, R14/15, R17, R18, R19, R20, R29, R36, R38, R42	950
Urban Fringe	DRA1, EAS1, HEL2, TROW1.	906
Main Towns	None	0
Key Service Centres	ACL1, ACL2, BLO1, BRU2, HET1, REP2	917
Broadland Villages	BLO5, CAW2, COL1, COL2, FRE1, HNF1,	186
Total		<b>2,959</b>

60. The sites from the site allocation plans which have been carried forward and are now predicted in the housing trajectory to deliver the remainder or all of their homes between 2027 and 2038 are listed in the table below. The sites highlighted (which together will provide 1,360 homes) do not currently have planning permission.
61. Information on why individual sites have been delayed and when they will be delivered is provided in the accompanying spreadsheet (D1.3A).

### Sites and Homes from Site Allocation Plans to be delivered from 2027 to 2038

Hierarchy	Allocation Reference	Homes to be delivered 2026 to 2038
Norwich	CC2, CC4a, CC4b, CC7, CC8, CC10, CC13, CC15, CC18/CC19, CC24, CC30, R2, R7, R14/R15, R31, R33, R37 R38, R42	1,460
Urban Fringe	DRA1 (Drayton), (EAS1) Easton (remainder of homes), HEL1 (Hellesdon), HEL2 (Hellesdon)	1,652
Main Towns	HAR4 & HAR5 (Harleston)	135
Key Service Centres	BRU2 (Brundall), HET1 & HET2 (Hethersett), REP1 (Reepham)	408

Broadland Villages	SWA1 (South Walsham), BUX1 (Buxton)	41
Total		<b>3,696</b>

62. Inclusion of these sites in the GNLP followed an assessment of their suitability and deliverability. The majority of sites are supported by a Statement of Common Ground/Delivery Statement with the site promoter setting out when they will be delivered based on current evidence. Where carried forward allocation sites have not been accompanied by a statement (14 sites), details of five-year land supply statements or recent planning consents and discharge of conditions applications have been included in the accompanying spreadsheet (D1.3A) for clarity.
63. In three cases, which together will provide 75 homes, sites are shown in red in the spreadsheet (D1.3A). This is because either site promoters have failed to respond to repeated requests for statements (R33 and BUX1) or have provided feedback that an individual site now may be less certain to be progressed (CC13). We will continue to attempt to gain further evidence on these sites.

**Question 16.** Can we be directed to the evidence which supports the position that 31,452 units will come forward on existing allocations or commitments during the plan period?

### Response

64. Evidence is in:
- The updated housing trajectory, prepared in August 2021, which is in Appendix 4 ([D3.2](#) from page 19 and [D3.2A](#)) of the Policy 1 Growth Strategy Topic Paper;
  - Appendix 5 of the same topic paper provides more detail on the delivery of strategic sites ([D3.2](#) from page 59) and
  - The Annual Monitoring Report (AMR) 2019-20 ([D1.4D](#)), includes Joint Delivery Statements for existing allocations and commitment sites (Appendix A(2) covers Broadland ([D1.4E](#)), Appendix A(3) Norwich ([D1.4F](#)), and Appendix 4a ([D1.4G](#)), b ([D1.4H](#)), c ([D1.4I](#)) and d ([D1.4J](#)) South Norfolk. These show further evidence of likely delivery dates provided by developers and have been taken account of in trajectory assumptions.
65. For commitment sites, the AMR provides a basis for the housing trajectory that is provided in Appendix 4 of the Policy 1 Growth Strategy Topic Paper. As part of annual monitoring processes, dialogue is taking place now with the development industry about the progress being made on sites. The new AMR for 2020-21 is expected to be ready early in 2022. The housing

trajectory is thus being kept under review, and further work could be done if there are specific sites causing concern.

66. Statements of Common Ground/Delivery Statements (see question 18) have assisted in providing base evidence which has informed the above.

**Question 17.** Can we be directed to the evidence which supports the assumed windfall contribution?

**Response**

67. The GNLP's assumed windfall contribution is derived from the evidence in the latest Housing Land Supply Assessment in Appendix A (Part 1) ([D1.4K](#)) of the Annual Monitoring Report 2019-20. This explains how the contribution of windfall development is assessed in paragraphs 26 to 40. The calculation of past rates is tabulated separately on page 146 of the Windfall assessment summary ([D1.4L](#)) which is referred to in the Housing Land Supply Assessment as Appendix D1. The lapse rates referred to in the assessment are tabulated in Appendix D2.
68. The assessment looks at the 10-year period 2008/9 to 2017/18. Based on these past rates the total annual average windfall across the three districts is expected to be 414 dwellings per year. The analysis is generally cautious and to further ensure no over-counting the Housing Land Supply windfall allowance reduces the past rates by 33% to 276 dwellings per year (totals from the penultimate row of each of the tables at the end of the Housing Land Supply assessment on pages 18, 22 and 26 in Appendices B1-B3). The contribution is also tapered in the first three years of the assessment period as explained in paragraph 34 of the Housing Land Supply Assessment.
69. Taking this approach, the windfall contribution to provision in the period between 2020 and 2038 is 0 in year one, 87 in year two, 184 in year three and 276 for the remaining years. This totals 4,411 dwellings.
70. The submission GNLP figure of "in the region of 4,450 dwellings" was based on draft analysis which indicated a past average of 416 dwellings per year, 2 dwellings a year higher than the published Housing Land Supply Assessment. As only 30% of the total is included in GNLP housing provision, the difference between these two figures is inconsequential.

**Question 18.** Can you direct us to, or confirm the position with, the statements of common ground for the development sites which are referred to on the Council's response to the summary of representations?

**Response**

71. The great majority of the Statements of Common Ground (or Delivery Statements as they are also called) have been published on the examination

website ([D2](#)). A limited number will follow due to the need to clarify site specific issues. The Inspectors will continue to be informed of progress.

72. These cover the development sites proposed for allocation in the plan and sites providing the existing commitment. They provide both the detail of when individual sites will be delivered and commit signatories to their sites meeting the GNLP's policy requirements.
73. There are 39 sites which do not have Statements of Common Ground, including sites for employment uses and open space allocations. Of the 18 sites which include housing, 12 sites providing 783 homes already have planning permission so that it was not necessary to pursue statements for these.
74. The reasons for some other sites including housing not providing statements are:
  - a. Further discussions are taking place with landowners over how the site will be delivered (GNLP0409BR, 220 homes);
  - b. Some site promoters have failed to respond to repeated requests for statements (R33, 10 homes; GNLP0188, 12 homes; GNLP0264, 45 homes; GNLP0608R, 20 homes and, BUX1, 20 homes).
75. The Statements of Common Ground, along with evidence from the 5-year land supply statement and other delivery evidence, have informed evidence on the delivery of sites which is set out in the Policy 1 Growth Strategy Topic Paper as follows:
  - a. Appendix 4 includes the updated housing trajectory in [D3.2](#) (with the site by site housing delivery timescales in the supporting spreadsheet in [D3.2A](#));
  - b. Appendix 4 also has more detailed analysis (in [D3.2](#)) on the deliverability of each new GNLP allocation (see pages 28 to 58);
  - c. Appendix 5 in [D3.2](#) (see pages 59 to 74) provides detail on the delivery of strategic sites. These are generally of around 1,000 dwellings plus and are either existing or new allocations which form part of the overall housing potential in the plan.

### **Costessey Contingency Site**

**Question 19.** What is the evidence which supports the Costessey site as a contingency site in the Local Plan? Why was the specific trigger mechanism set out in Policy GNLP0581/2043 chosen?

### **Response**

76. Two areas for growth in addition to the proposed sites for allocation were consulted on as potential contingency locations at the Regulation 18C stage of plan making. Paragraph 162 of the Strategy consultation document stated

*“A contingency site at Costessey for around 1,000 homes is included in this plan should this prove to be required due to low delivery of allocated housing sites. The settlement of Wymondham may also be considered for contingency sites to provide an additional 1,000 homes if required, though no specific sites have been identified at this time”.*

77. As set out in paragraph 181 of the GNLP Strategy ([A1](#)), the contingency site at Costessey has been identified *“To provide additional flexibility to ensure housing need can be met ..... should this prove to be required due to low delivery of allocated housing sites”.*
78. Costessey was identified as the most appropriate contingency site at the publication stage of plan making due to its location adjacent to developing urban extensions in Costessey and at Bowthorpe on the edge of the urban area. As a result, the site has good access to urban facilities, infrastructure and employment and is at the top of the settlement hierarchy. Additionally, there are no major site-specific constraints.
79. The trigger mechanism set out in policy GNLP0581/2043 ([A2](#)) would allow the site to come forward if overall delivery, as evidenced through the AMR:
- Is 15% or more below plan targets for three consecutive years;
  - And where under-delivery is the result of site-specific constraints preventing the delivery of committed and allocated housing sites.
80. The element of the policy requirement in the first bullet point above is designed to have a level of consistency with the Housing Delivery Test (HDT) in terms of using percentages of under delivery over three years. It was also chosen as it is readily measurable and the use of three consecutive years provides the certainty that there is a clear area wide under delivery problem which requires a solution rather than an exceptional year or two of under delivery.
81. The element of the policy requirement in the second bullet point above ensures that under delivery is due to site specific problems elsewhere rather than systemic housing market problems that the inclusion of the Costessey site, or indeed planning as a whole, would not be able to solve.

**Question 20.** Where is the evidence which supports the requirement for a school and local centre on it? If the site is not required what happens to the need for a school since presumably it would be serving the needs of a greater population than the site?

## **Response**

82. The need for a Local Centre would:

- Be generated by the on-site population on what would be a major scale development of around 800 homes;
- Address the plan priority to promote active travel and to reduce the reliance upon car use to access day-to-day convenience retail;
- Help reduce traffic pressure on the surrounding road network.

83. Local centres are also policy requirements for similar sized sites, including at Easton and Taverham.

84. The local secondary school Ormiston Victory Academy is likely to need to expand the secondary school age provision in coming years. As a result, the existing sixth form provision at the school will likely need to be relocated to make room for expanded secondary provision. If the contingency site is not available to accommodate a new sixth form building, Children's Services at Norfolk County Council would seek another suitable site in the area. Alternatively, the sixth form provision would be absorbed into other existing providers in the local area and city.

85. The primary school would serve both the requirements of the site if it came forward, as well as the needs of a greater population as there is considerable growth in the area, including at Easton and Bowthorpe. If the primary school site does not come forward through the contingency site, places would be made available in existing schools, but Norfolk County Council Children's Services may have to look at a wider area as all schools local to this site are at capacity. This would mean transportation of primary age children and potentially separating peer groups.

### **East Norwich Strategic Regeneration Area**

**Question 21.** This area is forecast to deliver 4,000 dwellings within the plan period. However, most of this area does not currently have planning permission and parts of it are described as being "constrained". How was the figure of 4,000 dwellings derived, and what net developable areas and densities are assumed in order to reach this figure? Have all of the main landowners confirmed that this site is available for development?

### **Response**

86. The GNLP policy for the delivery of in the region of 4,000 dwellings within the plan period reflects the 5<sup>th</sup> Studio study ([D1.4M](#)) commissioned by the Norwich City Council in 2018. This study explored the scale of the opportunity at East Norwich following the decision to close employment uses at the Britvic/Unilever site.

87. Further work supporting the allocation and progressing site development, including extensive consultation has been done by consultants. A draft stage 1 concept masterplan was reported to Norwich City Council Cabinet on 17<sup>th</sup> November 2021 ([D1.4N](#) & [D1.4O](#)). This provides the latest available

information relating to site capacity figures, net developable areas and densities.

88. The draft stage 1 concept masterplan was reported to Norwich City Council's Sustainable Development Panel (SDP) on 9<sup>th</sup> November 2021 ([D1.4P](#)) prior to being reported to Cabinet on 17<sup>th</sup> November. SDP is a cross party committee which does not have decision-making responsibilities but which makes recommendations to Cabinet, and has received regular updates on progress with the East Norwich masterplan since the masterplan commencement in March 2021. SDP members recommended the draft stage 1 masterplan to Cabinet subject to noting (a) that the panel considers there should be further engagement with the Environment Agency in relation to flood risk in the context of climate change, and (b) welcomes provision of community infrastructure for schools, health facilities and public transport but seeks assurance that there will be further consideration at the development stage to ensure that this infrastructure is provided.
89. At its meeting on 17<sup>th</sup> November 2021 ([D1.4Q](#)), Cabinet noted the comments by SDP, and approved the Stage 1 masterplan and agreed to move forward to Stage 2 of the process.
90. The stage 1 masterplan ([D1.4N](#) & [D1.4O](#)) document is an illustrative and high-level framework which will be developed further in stage 2 of the masterplan process, particularly in relation to infrastructure provision, phasing, deliverability and viability. The concept scheme provides the space to accommodate 3,469 residential units of different forms and tenure types. The level of housing development is somewhat lower than that envisaged in the GNLP allocation policy but not significantly so, given the site constraints.
91. The consultants have provided the following table which forms the basis of the housing calculation for the concept masterplan. The approach taken involved a process of reviewing the constraints in order to determine the extent of developable land, and then preparing a scaled masterplan concept scheme with new development concentrated within these developable zones.

#### Site Wide Estimates

Apartments				
No. Bedrooms	No. People	sqm	%	Units Total
1 BED	2	53	50.00%	1518
2 BED	4	75	45.00%	966
3 BED	6	98	5.00%	82
				<b>2566</b>
Houses				
No. Bedrooms	No. People	sqm	%	Units Total
2 BED	4	86	5.00%	60
3 BED	5	111	55.00%	512
4 BED	6	124	35.00%	292
5 BED	7	130	5.00%	40
				<b>903</b>
			Total Units	<b>3469</b>

92. The masterplan also proposes over 80,000 sq m of non-residential floorspace incorporating new workspace, retail, leisure, education, community and healthcare activity and can accommodate around 4,000 jobs (see table 5.2). The number of jobs in the concept masterplan is lower than the estimate of 6,000 in policy 7.1 but is still significant. The concept masterplan has been developed based on a thorough understanding of the site constraints, infrastructure needs, market analysis and through engagement with partners, stakeholders and the community.
93. Stage 2 of the masterplan process, which commenced in November, is anticipated to be completed by the end of March 2022. It will involve refinement of the masterplan through a more detailed examination of infrastructure delivery, further viability assessment and a review of assumptions. The output will be a draft supplementary planning document (SPD) to support the policy in the GNLP. The Stage 1 concept masterplan is therefore a starting point for a more detailed examination of viability and infrastructure costs/ delivery that will be undertaken during the Stage 2 process. This process may result in changes to the level of residential and non-residential uses set out in the Stage 1 concept masterplan.
94. All of the main landowners have confirmed that this site is available for development. Statements of Common Ground/Delivery Statements have been completed with the site owners/representatives (Deal Ground [D2.1](#), Utilities Site [D2.2](#), Carrow Works [D2.3](#) and Network Rail [D2.4](#)).
95. 'The East Norwich Partnership' was established in 2020 by Norwich City Council to work collaboratively to progress the development of this site, starting with the masterplan process. The partnership is led by Norwich City Council, with funding from partners and the Towns Fund. Membership is as follows: Utilities Site Owners (National Grid/RWE Enterprises), Deal Ground Owner (Serruys Property Company), Carrow Works Owner / Contracted Private Sector Developer (Fuel Properties), Homes England, New Anglia LEP, Norwich City Council (in its capacity as local authority for most of the

site and as landowner of Carrow House), Norfolk County Council, Broads Authority, South Norfolk Council and Network Rail.

**Question 22.** Can we be directed to the evidence which demonstrates that 4,000 new homes within the East Norwich Strategic Regeneration Area are viable and deliverable within the Plan period?

**Response**

96. Paragraph 334 of the GNLP Strategy ([A1](#)) sets out that significant additional funding has recently been secured from the Towns Fund (£100k) and other public and private sector partners (£575k) to progress the masterplan and acquire land in order to maximise the chances of successful delivery. It is expected that the masterplan's findings will inform implementation of this strategy and ensure that possible blockages to delivery can be overcome.
97. The Norwich City Council Cabinet report referred to above clarifies this further. The total financial commitment to date for the East Norwich Masterplan totals £675,000. This comes from both public and private sector sources including the Norwich Towns Fund, Norwich City Council, Norfolk County Council, Broads Authority, Homes England, Network Rail and the Norwich Strategic Fund, and from the landowners of the Deal Ground, Utilities and Carrow Works sites who are key stakeholders in the regeneration of this area. In addition Norwich City Council has also acquired Carrow House through the Towns Fund, giving it a landowner stake in the delivery of regeneration in East Norwich.
98. As stated above in response to question 21, stage 2 of the master plan will provide greater detail on viability and deliverability etc. Further to this, the Statements of Common Ground set out the site owners' intention to deliver the sites within the plan period and to meet plan requirements.
99. The evidence to demonstrate the site's capacity will be provided by the masterplan process which is currently underway. As noted above, the stage 1 concept masterplan published in November will be supplemented by a more detailed understanding of viability, infrastructure costs, delivery and deliverability in stage 2, resulting in the production of an SPD to support the GNLP.

**Question 23.** The Level 2 Strategic Flood Risk Assessment identifies that significant areas of this site are within Flood Zones 2 and 3 (including 3b). Is this reflected in the delivery assumptions for this site?

**Response**

100. The masterplan work is taking full account of the impact of flood risk on the site. The Deal Ground area of the site, which is most impacted by flood risk, is an existing adopted allocation ([D1.4R](#)) with an extant consent which was developed to mitigate flood risk.

### **Gypsy and Traveller sites**

**Questions 24 and 25.** The Greater Norwich Development Partnership Board 24 June 2021 resolved to ‘commit to proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs in accordance with the criteria-based policies of the current and emerging Development Plans’. The Homes Topic Paper provides more information on this work.

How does the Partnership expect this to be taken forward given it has submitted a plan which it considers to be sound? What are the timescales involved in this work? The Homes Topic Paper says that by the time that the Plan reaches examination the pipeline of pitches is likely to have expanded. However, the Plan is currently in examination. What is the expected outcome of this work? What are the implications of this work and its timescales for the examination of the plan and the arrangements for hearing sessions?

### **Response**

101. No sites for potential Gypsy and Traveller site allocation came forward during the local plan process. Consequently, the Partnership is taking a ‘twin-track’ approach to expanding the supply of Gypsy and Traveller sites. The first element is to engage and work with the local families to find new or existing land to provide extra pitches. The second element is for the local authorities to identify land from their existing assets, or to purchase suitable land.
102. Consequently, the Partnership has employed RRR Consultancy. Work currently being progressed includes interviewing families and gathering research to inform an updated Accommodation Needs Assessment (ANA). It is possible that this work will yield sites that can be brought forward as planning applications. This work should be completed by January 2022.
103. The Partnership’s officer group established to identify suitable development sites is in ongoing discussions with Homes England and registered providers to understand how sites could be financed, delivered and managed in the long-term.
104. The Partnership aims to bring forward suitable sites through the development management process. This is considered to be a workable solution, as described in the GNLP Strategy ([A1](#)) (see paragraph 279 supporting Policy 5).
105. The officer group will produce its initial findings by the end of 2021. These findings are intended to help bring forward a publicly owned site or lead to

the purchase of a site. Statements of Common Ground between the local authorities, landowners, and other parties (such as Registered Providers and Homes England) on delivering specific sites could be part of the outcome of this work.

106. Success with bringing sites forward through this approach in a timely manner should mean that there will not be implications for the timescales for the examination of the plan and the arrangements for hearing sessions.

**Question 26.** The Homes Topic Paper states that a Statement of Common Ground is to be produced in respect of Travelling Showpersons sites. What are the timescales for this?

**Response**

107. The statement with the Guild has recently been completed. It is Appendix 1 of this document.

**Policy 7.5 - Windfall sites**

**Question 27.** Would the parish dwelling limit include permissions that have already been granted since the start of the plan period?

**Response**

108. It is intended that the policy will apply to new permissions granted after adoption of the GNLP (see paragraph 389 of document [A1](#), the GNLP Strategy).
109. As the policy applies to development outside of any development boundary, it is not anticipated that there will be many permissions granted prior to plan adoption as any such development would be contrary to current policies.

**Question 28.** How would this policy operate in the event that several applications were submitted at once in a single parish?

**Response**

110. If such multiple applications exceed the limit for the parish then the most beneficial proposal or proposals (i.e. those most compliant with other policies) would be expected to be permitted. In circumstances where acceptable proposals could not be separated on their merits then the local planning authority (LPA) could permit developments in excess of the policy limits as an exception.

**Question 29.** What evidence has been used to arrive at the assumed contribution of 800 dwellings from this source?

**Response**

111. There can be no directly comparable evidence of delivery as this policy would provide an opportunity that does not currently exist. Paragraph 8 of the Policy 7.5 Topic Paper ([D3.13](#)) contends that it is reasonable to assume that delivery from this source will be strong as the policy opens up a limited number of opportunities for a new development market in desirable locations that have not been available for decades; it provides opportunities for self-build and SMEs; and it is likely that demand will exceed the maximum limit of 3 or 5 dwellings and, therefore, it can be expected that new sites will come forward quickly within the plan period.
112. In addition, this expected demand would provide replacement proposals for any permissions that lapse. Consequently, the contribution of 800 dwellings assumes that each parish will deliver up to its ceiling. Appendix 7 of the GNLP Strategy ([A1](#)) lists all the parishes across the area. Excluding Reepham Whitwell and Reepham Hackford (see below), it identifies 129 larger parishes (Broadland 44, South Norfolk 85) and 54 smaller parishes (Broadland 21, South Norfolk 33). Five dwellings in each of the former and three in each of the latter would deliver 807 dwellings.

**Question 30.** The Topic Paper on Windfall Sites refers to Reepham Whitwell and Reepham Hackford being errors in policy which will be corrected in the adopted plan. What are these errors and what is meant by them being corrected in the adopted plan?

**Response**

113. The policy applies to individual parishes. Reepham Whitwell and Reepham Hackford are not parishes but are parts of the parish of Reepham. The policy was not intended to and cannot, as worded, apply to these areas. They were included in GNLP Appendix 7 in error. This is a factual error, and it is intended to delete the reference in the adopted plan. If necessary, this can be consulted on as a main modification, or the change could be made as an additional modification for a factual error. We would welcome the Inspectors' view on the most appropriate approach.

**Question 31.** Is the Partnership able to provide any clarification as to what 'positive consideration will be given to self and custom build' means in Policy 7.5?

**Response**

114. Where there are competing proposals, self and custom build would be a positive material consideration.

**Employment Land**

**Question 32.** Does the definition of, and the approach to, 'employment land' reflect the recent introduction of Class E into the Use Classes Order?

**Response**

115. The approach taken continues to target employment land for office, industrial and warehouse uses. This is consistent with the evidence detailed in documents [B3.2](#), [B3.9](#) and [B3.10](#), and explained in [D3.8](#) the Policy 6 Employment Topic Paper. The National Planning Policy Framework (NPPF) recognises that land should be allocated to meet identified needs and that different sectors have different needs. The NPPF also seeks to concentrate town centre uses within town centres. Extending the use of sites to all E class uses would be inconsistent with the evidence, such as the lack of need for large scale retail development, and with the NPPF. Bringing retail, offices and some leisure uses into the same Class E provides flexibility in town centres. However, large scale development, particularly out of centre, will have very different implications, for example for traffic generation and town centre impact, and it is important to ensure that the development that takes place is consistent with the evidence.
116. Following the introduction of the revised use class order on 1st September 2020 a review of the strategic policies and site allocations policies was undertaken. References to use classes were updated in accordance with the up-to-date use classes in the Regulation 19 draft of the GNLP. However, the updates were not carried forward into the Appendices to the Strategy, including the glossary and monitoring framework which require correction.
117. The definition of ‘Employment use’ in Appendix 2 Glossary states:  
*“Use primarily for industrial, warehousing, office or other business uses falling within classes B1, B2 and B8 of the use classes order.”*
118. This is out of date as it still refers the class B1 which has been revoked under the revised order. This is an oversight which was not updated and should be changed as an additional modification (a factual correction) to read:  
*“Use primarily for industrial, warehousing, office or other business uses falling within classes **E(g)**, B2 and B8 of the use classes order.”*
119. The monitoring framework at Appendix 3 contains reference to B1 use for monitoring indicator codes GNLP14 and GNLP15.
120. Monitoring indicator GNLP14 should be corrected to read:  
 To monitor office ~~(B1)~~ **E(g)**, industrial (B2), and storage / distribution (B8) floorspace implemented on allocated sites.  
 Monitoring indicator GNLP15 should be corrected to read:  
 To monitor office ~~(B1)~~ **E(g)**, industrial (B2), and storage / distribution (B8) floorspace implemented on non-allocated sites.

## **Western Link**

**Question 33.** Can the Partnership please confirm the status of the Western Link referred to in the Local Plan in Policy 4 and within the Glossary? Is the delivery of the development provision set out in the Local Plan, or any part of it, dependent upon the completion of this road?

### **Response**

121. The Norwich Western Link (NWL), which will complete the route of the A1270 (part of the Major Road Network) to the A47 (part of the Strategic Road Network) west of Norwich, is promoted as one of the county wide infrastructure priorities of Norfolk County Council.
122. Its status is that:
- The preferred route announcement was made in 2019;
  - Transport East (the relevant sub-national transport body) included the project as a priority in its programme for government's Large Local Major Schemes alongside its Regional Evidence Base submission in 2019;
  - The Strategic Outline Business Case was approved by the Department for Transport (DfT) in May 2020 giving the project conditional entry into its 'Large Local Majors' funding programme and awarding more than £1 million of development funding for the project in the 2020/21 financial year;
  - It is being considered as a committed scheme in the review of the Transport for Norwich Strategy which has recently been consulted upon and is anticipated to be adopted by the end of 2021;
  - The scheme will be assessed through the planning application process, which is due to be submitted in 2022. As part of this process, the environmental effects of the NWL will be assessed against the relevant legislative and regulatory requirements, together with all other material considerations.
123. Paragraph 44 of the Policy 4 Strategic Infrastructure Topic Paper ([D3.5](#)) states that *In the same way that policy 4 sets out improvements to rail services and to trunk roads, the GNLP does not promote the NWL as a proposal of the plan, but instead reflects its inclusion in other plans.*
124. Policy 4 of the GNLP therefore lists the NWL as an element of Transport for Norwich, stating:

*A considerable shift towards non-car modes will be promoted in the Norwich urban area over the plan period. High density growth will be focussed in locations with good access to improved sustainable transport networks and interchanges in Norwich, creating a virtuous cycle where clean transport is prioritised, less use is made of cars and space is used more efficiently and*

*attractively. This will be achieved by Implementation of the Transport for Norwich Strategy including:*

- significant improvements to the bus, cycling and walking networks to promote modal shift;*
- developing the role of the park and ride system;*
- changing attitudes to travel;*
- delivery of the Norwich Western Link road.*

125. No development delivery in the GNLP is dependent on the completion of the NWL road. As set out in paragraph 5.9 and the map in 5.11 of the consultation on Transport for Norwich ([D1.4S](#)) held in autumn 2021, the NWL's purpose is to be one of a range of new strategic connections to benefit the economy. It is intended to assist with the promotion of sustainable transport measures to capture the benefits of the improved connections within the Norwich urban area and the strategic growth area around it.

126. The proposals in the GNLP which are likely to benefit most directly from the NWL are the strategic employment sites at the Norwich Airport area and the Food Enterprise Park at Easton/Honingham promoted in policies 1 and 6. While the NWL would enhance access to these locations in particular, neither of these sites rely on its implementation as strategic road links are already in place via the A47 and A1270 and strategic bus corridors provide links to the city centre.

**Appendix 1**

Greater Norwich Local Plan (GNLP) Statement of  
Common Ground (SoCG)

Between

Broadland District Council, South Norfolk Council,  
Norwich City Council, Norfolk County Council

And

Showmen's Guild of Great Britain (Eastern  
Region)

## 1. Introduction

The Greater Norwich Local Plan (GNLP) proposes that plots and yards for Travelling Showpeople be met through market led solutions through a criteria-based policy. This statement of common ground relates to how the Eastern Region of the Showmen's Guild of Great Britain and the Greater Norwich authorities will work together to ensure a suitable supply of land comes forward.

This statement of common ground covers the following key points:

1. Needs Evidence
2. The Approach to Policy
3. Commitment to the Delivery of Sites

## 2. Needs Evidence

The Eastern Region Guild and the Greater Norwich authorities agree that the 2017 Accommodation Needs Assessment (ANA) by RRR Consultancy assessed the supply and accommodation needs of Gypsies and Travellers, Showpeople, residential boat dwellers and residential caravan dwellers within the Greater Norwich area (Broadland District Council, Norwich City Council and South Norfolk District Council). In 2021, RRR Consultancy updated the accommodation needs for Showpeople within the Greater Norwich area as part of the 2021 ANA.

No new supply has been implemented since the 2017 ANA. Based on the updated assessment (2021), the need for additional Showpeople accommodation is as follows:

	2021-2026	2026-2031	2031-2036	2036-2041	Total
Travelling Showpeople accommodation need (plots)	27	6	7	10	50

## 3. The Approach to Policy

The Eastern Region Guild and the Greater Norwich authorities agree that the GNLP creates the opportunity for a supply of plots for Travelling Showpeople; and, it is agreed that the approach to policy will allow plots to come forward at a pace that will meet needs.

## 4. Commitment to the Delivery of Sites

The Guild and the Greater Norwich authorities agree to have a mutual commitment to collaborate on the delivery of new sites – for example, if opportunity arises for central government grant funding. This includes a commitment amongst all parties to suggest and discuss suitable sites through planning application advice.

Signed on Behalf of the Greater Norwich Development Partnership  Mike Burrell	[4/11/2021]
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Signed on behalf the Showmen's Guild of Great Britain (Eastern Region)  Jane Brown	1/11/2021
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