

Greater Norwich Local Plan

Topic Paper: Policy 4 Strategic Infrastructure

Summary

This topic paper identifies the key infrastructure requirements to support growth in Greater Norwich to 2038 set out in Policy 4, and its associated Appendix 1, of the Greater Norwich Local Plan (GNLP). The policy covers strategic transport, energy, water, education and health care infrastructure. It also covers on-site and local infrastructure, services and facilities. The paper summarises the drivers of the policy, considering the policy context and evidence for the infrastructure requirements.

The plan has carefully considered all the strategic infrastructure needs of the Greater Norwich area, and this has informed the plan making process and the growth we are planning has been informed by our strategy. While the Community Infrastructure Levy (CIL) will help to provide some infrastructure schemes as reflected in the Greater Norwich Infrastructure Plan (GNIP), the majority of infrastructure requirements identified at the strategic level are to be provided by a range of different infrastructure providers, such as Anglian Water, UK Power Networks, health care providers, Norfolk County Council and Highways England and through a variety of funding sources as detailed in Appendix 1. During the plan making, we have actively engaged with these strategic infrastructure providers and we are satisfied that there are no unmet needs that we have not considered. The plan will ensure that the Greater Norwich authorities work closely with these infrastructure providers to bring key schemes to fruition to support sustainable growth.

The paper concludes that the policy makes sufficient provision for the strategic infrastructure requirements identified for the Greater Norwich area. Any future emerging need or change in existing identified need due to changes in circumstance can be considered through the annual production of the Norfolk Strategic Infrastructure Delivery Plan.

Purpose

1. This topic paper is part of a series of papers. It provides further justification and explanation of Policy 4 for strategic infrastructure and its supporting Appendix 1 for the submission of the Greater Norwich Local Plan (GNLP) and its consideration at examination. It should be read alongside the Statement of Consultation.

Background

2. The Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS), which was adopted in March 2011 with amendments adopted in January 2014, which covers the period 2008 to 2026, makes provision for strategic level infrastructure

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for transport, water, energy, health, education and green infrastructure, in line with the requirement set out in the National Planning Policy Framework. It was informed by the Greater Norwich Infrastructure Need and Funding Study 2009. This formed the successful basis for subsequent infrastructure and other plans which have co-ordinated delivery of the broad range of infrastructure required to serve growth, including the Norwich Northern Distributor Road, public transport such as Roundhouse Bus Interchange and walking and cycling upgrades such as Wymondham to Hethersett off-road cycle/walk path. More recently, Anglian Water has started the construction of Norwich to Wymondham pipeline to improve water supply.

3. The emerging GNLP, which covers the period 2018 to 2038, continues the approach focussing on the timely delivery of strategic infrastructure to support growth. The provision of new and improved infrastructure is essential to ensure the growth planned through the GNLP is sustainable. This paper provides an explanation of how the Greater Norwich Local Plan Infrastructure Needs Report 2020 (GNLPINR) relates to the production of the Policy 4 of GNLP. The report also informs the contents of Appendix 1, which provides additional detail to support Policy 4, and site allocation policies which include any site-specific infrastructure requirements.

Context

4. The NPPF states that local plans should make sufficient provision for infrastructure requirements including transport, waste management, water supply, flood risk, and the provision of energy in addition to the provision of community facilities such as libraries and schools.
5. The NPPF also states that to achieve sustainable development the planning system should identify and coordinate the provision of infrastructure. Effective and on-going joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
6. The vision for infrastructure set out in paragraphs 138 to 143 of the GNLP Strategy is that by 2038:
 - Our transport system will be enhanced by a combination of infrastructure improvements and new technologies. Connectivity will improve both within Greater Norwich and to other parts of the country and beyond.
 - Together these will provide greater travel choices and allow people to make the best use of evolving sustainable transport networks.
 - The plan will help to reduce the impact of travel.
 - For journeys that are still needed there will be a radical shift away from the use of private car, with many people walking, cycling or using clean public transport.

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- In addition, the delivery of improved telecommunications, broadband and utilities infrastructure will support business development, home working, carbon reductions and access to services while also reducing transport emissions
- Existing schools and health facilities will be expanded to serve growing communities.

7. Stemming from that vision, the objective for infrastructure in paragraph 151 is:

To promote the timely delivery of infrastructure to support existing communities, growth and modal shift in transport use; and to improve connectivity to allow access to economic and social opportunities.

8. The strategic level infrastructure identified in Policy 4 and Appendix 1 to implement the vision and objectives will be provided by a range of organisations and through a variety of funding sources. The appendix sets out infrastructure currently identified to support growth from organisations such as utilities companies and health care providers. Since these may be subject to change over time, the Greater Norwich Infrastructure Plan, which supports implementation of the GNLP, will update the information in Appendix 1 of the GNLP strategy annually to take account of any changes.
9. The plan has carefully considered all the strategic infrastructure needs of the Greater Norwich area, and this has informed the plan-making process and the growth we are planning has been informed by our strategy. The Community Infrastructure Levy (CIL) will help to provide some infrastructure schemes as reflected in the Greater Norwich Infrastructure Plan (GNIP). These are generally smaller and more localised schemes. The majority of infrastructure requirements identified at strategic level are to be provided by a range of different infrastructure providers, such as Anglian Water, UK Power Networks, Norfolk County Council, health care providers and Highways England and through a variety of funding sources as detailed in Appendix 1. The evidence base goes into greater detail on which provider/organisation holds the main responsibility for the delivery for each particular type of infrastructure. During plan-making, we have actively engaged with these strategic infrastructure providers and we are satisfied that there are no unmet needs that we have not considered. The plan will ensure Greater Norwich authorities work closely with these infrastructure providers to bring key schemes to fruition to support sustainable growth.

Evidence

10. The GNLPINR 2020 is a review of the infrastructure requirements to provide growth planned through the GNLP and identified the strategic infrastructure requirements to serve growth sets out in the local plan.

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11. The report gave appropriate consideration to all relevant national guidance and legislation including National Planning Policy Framework and Community Infrastructure Levy, and the likely future changes to infrastructure funding regimes as proposed in the 2020 consultation for the “Planning for the Future” white paper. The policies of the emerging GNLP allow for the use of infrastructure payments from development, be they from CIL or any replacement. It is important to bear in mind that CIL only provide a part of infrastructure required to support growth, as identified in the themes that are prioritised with Greater Norwich’s ongoing infrastructure plans. Many other infrastructure requirements identified in this plan will be funded and delivered by other means.
12. The report also gave appropriate consideration to relevant local infrastructure plans and strategies, such as New Anglia Integrated Transport Strategy, Norfolk Strategic Infrastructure Delivery Plan, Greater Norwich Infrastructure Plan and Local Transport Plan.
13. The Government has updated the standard methodology for identified local housing need, based on 2014 based household projections (as confirmed in December 2020). The formula gives an annualised need of 2,027 homes per annum for the Greater Norwich area. It is however prudent to provide more in GNLP, to cover general uncertainty and a direction of travel from central government in terms of an expectation to plan for higher numbers of homes. As such the GNLP has included a significant buffer (22%) to accommodate this expected increased growth proposing a total housing figure of 49,500 over the plan period and the infrastructure has been identified accordingly.
14. In terms of economic growth, since 2011, the Greater Norwich area has supported an average job growth of 3,300 per year. The population projections have shown that to meet the requirement of an increasing population there will be a minimum requirement for an additional 22,000 new jobs. Local evidence has shown that the total amount of allocated and permitted employment land is more than sufficient to provide for expected and promoted growth.
15. The policy for each specific category of strategic infrastructure has taken account of, evidence, local needs, strategies, opportunities and constraints as detailed in the paragraphs below.
16. Transport: Future housing growth’s impact on the transport network as well as long term changes caused by the Covid-19 pandemic have been considered in the formation of Policy 4. Local transport strategy for the Norwich areas is shaped by Norfolk County Council’s third local transport plan (2011) and the Norwich Area Transportation Strategy (2013). Both of these are in the process of being updated alongside the GNLP.
 - Walking and Cycling: The GNLP has been informed by the Walking and Cycling Strategy for Norfolk that sets out Norfolk County’s vision for cycling and walking to 2025. The overall aim is to increase the modal share of cycling and walking

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to 10% of all journeys by 2025 and 25% by 2050. The needs of the pedestrian and cycling network to support the future planned growth in the area are currently being looked at through the emerging Local Cycling and Walking Infrastructure Plan (LCWIP). This will provide a strategic approach to identifying cycling and walking improvements required at the local level and form a vital part of the Government's strategy to increase the number of trips made on foot or by cycle by developing and expanding the current cycling and walking networks. Recently, a number of walking and cycling schemes have been completed, such as Wymondham to Hethersett Cycle link, Prince of Wales Road and King Street as well as the launch of Beryl Bike Share Scheme.

- Rail: The GNLP has been informed by the needs identified in the Norfolk Rail Prospectus 2013 which is currently under review. Funding for rail improvements will come from central government and be delivered by Network Rail and the current franchise operator. There has been a significant investment in the rail network and the introduction of new trains across the Greater Anglia franchise along with the delivery of Norwich to London in 90-minute services.
 - Public transport: Local needs have been identified including the need to improve bus services and enhancement of infrastructure provision within the city centre. The fact that provision of public transport services in the rural areas of Greater Norwich is not at the same level as in the urban areas has been recognised. Significant investment has been secured from the Government's Transforming Cities fund, which will provide £59 million funding for investment in a range of measures including delivering reduced travel times for bus passengers on the most popular routes. Provision of additional services would be mostly the responsibility of bus operators.
 - Road: The A11 and A47 are both part of the national strategic road network managed by Highways England. Highways England are committed to dualling the A47 Easton to North Tuddenham and Blofield to North Burlingham and junction improvements to the Thickthorn roundabout. The A140 Long Stratton Bypass is a Norfolk County Council priority and has been included in the programme for the Major Road Network (MRN) schemes by government. The construction of the Norwich Western Link will complete the route of the A1270 to the A47 west of Norwich. The preferred route announcement was made in 2019 and the Strategic Outline Business Case was approved by the Department for Transport (DfT) which has given the scheme conditional entry to the Large Local Majors project funding programme.
17. Energy: The Greater Norwich Infrastructure Study (2019) (GNEIS) concludes: *"Growth across Greater Norwich imposes a significant challenge to some of the existing energy infrastructure, without major upgrades to existing infrastructure at significant cost the planned levels of development will not be possible in some areas. Particular capacity concerns are highlighted at substations at Sprowston, Peachman Way (Broadland Business Park), Earlham and Cringleford, serving a significant proportion of the growth planned for through this plan."*

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18. The study recommends that the GNLP should minimise energy demand, reduce the carbon intensity energy supplies and encourage the use of local and sustainable energy sources.

19. GNEIS also recommends that the following substations require upgrades and/or the use of measures to off-set the need for reinforcement:

Substation (132/33kV)	Affected development sites
Sprowston Primary	Beeston Park Home Farm Sprowston Land off Salhouse Road Land south of Green Lane East Land south of Green Lane West Land south of Salhouse Road Rackheath White House Farm
Peachman Way Primary	Broadland Gate Brook Farm Land east of Broadland Business Park Land north of Broadland Business Park
Earlham Grid Local A/B	Costessey GN Food Enterprise Park Longwater / Easton Norwich Research Park Three Score
Cringleford Primary	Cringleford Hethersett

20. Water: Anglian Water (AW) provides water supply and recycling infrastructure for the Greater Norwich area. Modelling for sustainable water supplies to meet growth needs has been done through Anglian Water's [Water Resources Management Plan](#) (WRMP - December 2019). In relation to water resources, the WRMP states:

“The Norfolk area is mainly in surplus for the entire plan There is adequate surplus resource to allow a local transfer between neighbouring WRZs (i.e. Water Resource Zones).

21. The WRMP strategy accordingly plans for local water supply transfers from the Norwich and the Broads WRZ, which covers much of Greater Norwich, to the Norfolk Rural North WRZ, which covers much of Breckland and to Happisburgh WRZ in North Norfolk. It also plans for transfers between the River Wensum and Wymondham, implementation of which is currently being progressed, to serve growth. Significantly for the GNLP, the WRMP places a major focus on water efficiency.

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22. To address the growth needs in Greater Norwich, AW identifies the Yare Valley Sewer as a strategic sewer investment requirement.
23. AW's Water Recycling Long Term Plan (2019) identified the need to increase drainage capacity through Sustainable Drainage Systems (SuDS) and upsizing sewers within the Whitlingham catchment.
24. The above plan also planned investment to address the growth needs for Acle, Aylsham, Belaugh and Water Recycling Centres. Increased drainage capacity and Combined Sewer Overflow investigations and improvements are included as part of the plan.
25. There is no strategic-scale flood risk infrastructure in the Greater Norwich area, with only with some local mitigation in place. The great majority of the growth planned through GNLP avoids areas of risk of flood. SuDS will be required to address risk of surface water flooding.
26. The Greater Norwich Water Cycle Study provides further information on these above issues.
27. Education: Appendix 1 provides details of new schools to serve growth, which will be updated annually through the Greater Norwich Infrastructure Plan (GNIP), or any successor, to ensure it is up to date. The policy provides flexibility for provision of new schools to take into account of changing circumstances.
28. Norfolk County Council is either building or actively planning to provide the following schools in the next 2-3 years.
 - Cringleford new primary school – 420 place primary school
 - Wymondham College prep school – 420 place free school
 - Costessey Ormiston Victory Academy – expansion
 - Sprowston Academy - expansion
 - Blofield – relocation and expansion
29. Other new schools are planned across the Greater Norwich area once housing and pupil numbers suggest that existing schools in the area are no longer able to accommodate local children. These currently include 10 new primary schools and one secondary school:
 - Wymondham Silfield – 420 place primary school
 - Poringland – new school in response to considerable housing in the area – site search investigation being commissioned.
 - Salhouse Road, Sprowston – site safeguarded for new 420 place school within new housing development.
 - Hellesdon – new 420 place primary school within new development on former golf club grounds.
 - Beeston Park – sites for 2 x 420 place schools within proposed new housing development.

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- Beeston Park – currently identified location for the new secondary school required to support housing growth in the area.
- Rackheath – 2 x 420 new primary phase schools
- Land north and south of Smee Lane, Norwich – planned new 420 place primary school in response to growth.
- Long Stratton – new 420 place primary school building in response to strategic growth in the village.

30. In terms of funding, as Greater Norwich charges CIL, only land can be secured through S106 agreement. The current annual amount Norfolk County Council receives through CIL does not cover the full cost of school expansion. The County Council uses Basic Need and other central government grants to fully fund these projects.

31. Health Care: Forward planning for health care is considered a high priority. Accordingly, the Greater Norwich Health Infrastructure Delivery Plan 2021 -22 (HIDP) is in the process of being developed. The Greater Norwich authorities have engaged with the health care providers during the production of the plan, and they have raised no objection to the policies set out in the plan. It is the healthcare providers' responsibility to deliver health care infrastructure schemes to address needs identified in the plan through their Annual Investment Plan.

32. The currently assessed needs resulting from growth in Greater Norwich have been set out in Appendix 1 of the GNLP:

Type of need	Existing Services	Additional need resulting from growth
Primary Care	GPs (currently 68 surgeries, 43 of which are main surgeries and 25 branch surgeries), community pharmacists and optometrists.	There are currently 2 options to increase capacity as required around the north and north-west of Norwich: <ol style="list-style-type: none"> 1. New build at Broadland Hub within or close to planned development at Beeston Park. 2. No new build, increased numbers spread amongst existing practices. The selected option will be confirmed in the annual review in 2020.
Hospital	There is one acute hospital, the Norfolk and Norwich University Hospital NHS Foundation Trust (NNUH). Other services are delivered from several other locations.	The NHS Long Term Plan and the STP Delivery Plan, currently in production, will address building capacity and facilities (including new rooms, theatres and beds, current estimated cost c. £36 million) and parking issues.
Mental Health	Norfolk and Suffolk NHS Foundation Trust (NSFT)	In line with the shift to care in the community, the mental health trust is expected to shift

	provides a broad range of services across Greater Norwich, with Hellesdon Hospital and the Julian Hospital in Norwich the largest sites.	services to wrap around primary care networks. Existing clinical and administrative provision at Hellesdon is not fit for purpose. This area of the site is going through a disposal process for housing. The NSFT's remaining accommodation in Norwich has constraints, including parking at the Julian Hospital. There is no spare capacity in primary care for mental health services in Diss and this may need to be reviewed. The above is included in the NSFT estates strategy review to be addressed as by the GNLP as and when appropriate.
Community Services	These are provided by Norfolk Community Health and Care NHS Trust at community hospital sites and health centres and include: <ul style="list-style-type: none"> • Inpatient specialist rehabilitation services; • Clinic services for outpatients; • Community nursing in patients' homes. 	Clinical rooms are required at: Norwich Community Hospital; NNUH; Thorpe and Wymondham Health Centres (estimated total cost c. £200,000).

33. In terms of funding, the fully developed Sustainable Transformation Partnership/Integrated Care System will share its investment pipeline and highlight a prioritised list of investment proposals and requirements for the healthcare estate and infrastructure across Greater Norwich. Potential funding can be identified from a variety of sources such as the NHS England Improvement grant.

34. Appendix 1 also sets out the infrastructure needs in the Greater Norwich for Libraries, Sports and Leisure, and Waste Management.

Regulation 18 Consultations

35. During late 2017/early 2018, Regulation 18A Growth Options, the vast majority of respondents (137) felt there are infrastructure requirements to support the overall scale of growth, with just 4 respondents stating that there are none. In line with discussions at consultation events, many responses focussed on health, transport, schools and water. In addition, a number of responses stated that infrastructure needs would be dependent on the option chosen for growth.

36. The following table contains detailed comments made on infrastructure needs to support overall growth.

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Issue	Representations Summary
Transport	
Air	Given the current and future economic importance of Norwich Airport, development nearby must not become a barrier to the airport's future expansion.
Road	<ul style="list-style-type: none"> Road improvements required include: <ul style="list-style-type: none"> A47 dualling and other improvements (including Thickthorn roundabout + Longwater junction), A140 (including the Long Stratton bypass); Norwich Western Link; A14, A11/M11; A1151, with a river crossings review (Wroxham PC); Better maintenance; Local roads. Better traffic management, modelling and improving traffic flow around the city (including not closing roads and adding cycle lanes) needed; Rural infrastructure e.g. petrol stations may need to be located outside existing settlements; Car sharing should be promoted.
Rail	<ul style="list-style-type: none"> Improved services needed to London, Cambridge/Oxford + Midlands (including Ely upgrade); Replacement of the Trowse swing bridge by a double track bridge and/or need for parkway station near Mangreen; More stops/better local rail services e.g. stations needed at Broadland Business Park, Thickthorn and Long Stratton; Potential for tram/light rail services; More affordable services required.
Bus	<ul style="list-style-type: none"> More park and ride provision and reduced cost; Bus rapid transit network (BRT) should be developed as planned; Need for rapid bus routes across the county; Subsidised/cheaper buses required.
Walking and Cycling	<ul style="list-style-type: none"> High quality walking and cycling facilities required; Segregated cycle routes needed.
Strategic Considerations	<ul style="list-style-type: none"> Congestion can only be reduced through much greater investment in public transport (notably the long-promised BRT network, for which the money seems to have been swallowed up by the NDR which was supposed to facilitate it); No road scheme should proceed without an equal amount of investment in other forms of transport; Climate mitigation and adaptation must be considered; Sustainable transport costs are less if housing is concentrated in and around existing centres at higher densities, with brownfield development maximised (supporters for this approach include the CPRE); If villages are forced to have development, transport links, including buses, need to be good.

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Other Infrastructure	
Digital Communications	High speed digital and mobile phone services are needed.
Green Infrastructure	<ul style="list-style-type: none"> • Further expansion of the green infrastructure network (including habitat protection and creation and cycling and walking facilities) was supported by a number of respondents including Natural England and the Yare Valley Society; • There was support for a network of strategic country parks associated with site allocations from some agents; • Additional playgrounds, sports and recreation facilities are needed; • Local food production should be supported.
Health care	<ul style="list-style-type: none"> • Health care was a major concern, including GP surgeries, hospital provision and dentists; • Some respondents, including Costessey Town Council and NHS Norwich CCG, stated that new health care provision to provide for growth should be partly provided by CIL and Section 106 payments. The CCG also stated that broadband improvements could reduce the need for people to attend GPs. • There is a difficulty in attracting GPs into the area; • Ambulance services will require funding as a result of growth.
Education	<ul style="list-style-type: none"> • School capacity was raised as a significant issue; • The Department for Education stated that the draft local plan should identify specific sites (existing or new) which can deliver the school places needed to support growth, based on the latest evidence of identified need and demand; • Better education facilities are required for all children, not just those in the well off areas; • There is a difficulty in attracting teachers into the area.
Utilities	<ul style="list-style-type: none"> • Water supply, conservation and disposal was a concern, with many pointing to the fact that this is one of the driest parts of the country; • It was stated that consideration must be given to ensure that water supplies are sustainable before allocations can be made; • Anglian Water (AW) stated that it was consulting on its new plan for managing the water supply/demand balance so that it can continue to meet needs in Greater Norwich; • AW is also finalising a Long Term Water Recycling Plan which will set out the strategy for investment in water recycling centres or foul sewerage catchments; • Respondents also identified the need for additional gas and electricity infrastructure, along with more renewable energy generation.
Community	Libraries, local shops and additional policing are needed.
Social care	Care facilities and homes for the elderly are needed.
General comments	New Anglia LEP welcomed the opportunity to continue to support the acceleration of economic growth through future agile, innovative delivery models and funding mechanisms.

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	Respondents stated there is a need for timely provision of new infrastructure, with some stating that too many promises in recent years had not been delivered.
	Respondents argued that consideration of infrastructure constraints and further development of the evidence base was critical to the identification of the most appropriate growth locations.
	It was argued that a dispersed approach to accommodating a proportion of growth may allow for more development to come forward within existing capacity limits in rural areas, or in areas where the upgrades are more affordable/easy to deliver.
	Others argued that it is easier to provide infrastructure if development is in new settlements.
	It was also stated that development should be focussed on fewer, larger areas, for which a comprehensive delivery programme on all aspects of the development can be established because the scale and quantum exists to generate viability for infrastructure.
	It was argued that local authorities must have greater funding from Government and be able to borrow money as CIL will not meet infrastructure needs.

37. In the early 2020, there was a further Regulation 18 consultation (Reg 18C), this time on the draft plan. During the Reg 18C consultation, the following questions dealt with infrastructure:

- Question 23 – *Do you support, object or have any comments relating to approach to transport?* There were 53 representations (12 support (S), 18 object (O) and 23 comments (C)). There were concerns from some members of the public on carbon emissions and its impacts of climate change from the proposed road schemes. Local parish councils generally emphasised the importance of improving public transport provision and other more sustainable forms of transport.
- Question 24 – *Do you support, object or have any comments relating to the approach to other strategic infrastructure (energy, water, health care, schools and green infrastructure)?* There were 35 representations (2S, 4O, 29C). There was general concern from members of the public over the negative impacts of growth on the capacity of healthcare services. There were some suggested wording changes from organisations such as Anglian Water and Department for Education. Concerns over the strain that growth will put on local educational services as well as the environment were also raised by parish councils and political organisations.
- Question 25 – *Do you support, object or have any comments relating to the approach to on-site and local infrastructure services and facilities?* There were 22 representations (15S, 1O, 6C). Businesses and parish councils expressed the importance of infrastructure delivery being proportionate to each development.
- Question 26 – *Are there any topics which have not been covered that you believe should have been?* There were 12 representations (3S, 1O, 8C). Parish councils commented on the importance of providing more support for pedestrian and

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cycling infrastructure. Highways England commented on the need to include wind power and electric vehicle charging infrastructure in the plan.

38. For more information about representations, see the Statement of Consultation, which is organised by consultation question.

39. The table below summarises the changes which were made to the GNLP strategy following Regulation 18C consultation. It also provides a justification for these changes.

Policy	Summary of Changes	Reason for Changes
Policy 4 Strategic Infrastructure	Updates to text on transport issues.	To reflect the passage of time since the Reg. 18C draft plan was produced.
	Inclusion of “changing attitudes to travel” as an aim of the Transport for Norwich Strategy.	To reflect its inclusion as part of the Transport for Norwich Strategy.
	Deletion of reference in policy to the cross-valley link, with a reference to its inclusion in Transport for Norwich included in the text.	To reflect the fact that there is currently no scheme for this proposal.
	Limited changes to the text and policy re. water infrastructure.	In response to comments from Anglian Water.

GNLP Regulation 19 Policy and publication February to March 2021

40. For the Regulation 19 consultation, 40 representations were made in regard to Policy 4 and 4 representations on Appendix 1. The table below summarises the representations made in regard to Policy 4:

Topic	Main Issues raised
Transport	<ol style="list-style-type: none"> 1. Too much emphasis on traditional modes of transport and associated schemes, not enough detail on promoting walking, cycling and other forms of sustainable transport; 2. The policy does not go far enough in terms of reducing carbon emissions and tackling climate change; 3. Opposition to the possible construction of Norwich Western Link on the grounds of environmental damage; 4. Concerns that the lack of an up to date transport planning/evidence base (e.g. LTP4 is still in draft stage) means there is disconnect between sustainable transport and spatial growth planning.

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Other Strategic Infrastructure	<ol style="list-style-type: none"> 1. Anglian Water has asked for minor modifications over some terminology; 2. No coverage of waste-water infrastructure, the Water Cycle study and the Water Framework Directive; 3. Norfolk Constabulary should be included within the strategic infrastructure element of policy 4, like the health Infrastructure, as well as the specific reference to a (forthcoming) Police Infrastructure Delivery Paper; 4. There is no detail on the delivery of strategic Green Infrastructure (GI); 5. There is no mechanism to secure the education infrastructure.
General	<ol style="list-style-type: none"> 1. Agents promoted specific sites that they believe to be suitable to support the vision and the ambition set out in Policy 4; 2. Breckland District Council has concerns that the cumulative impact of growth identified in the plan could cause further strain on local power and water resources, waste management and transport infrastructure.

41. The table below summarises the representations made for Appendix 1.

Topic	Main Issues raised
Appendix 1 - Infrastructure	<ol style="list-style-type: none"> 1. Sewage treatment in Aylsham - there should be a clearer plan to address capacity shortfall before any housing development; 2. There is a shortfall of provision in all aspects of health care; 3. Police infrastructure requirements (based on forthcoming evidence) should be included in Appendix 1, with a cross reference to Policy 4; 4. No infrastructure needs have been identified for Hingham, despite the cumulative impacts of development in the town.

42. As part of the response to Reg.19 representations, there have been some minor modifications to specific text of the plan as a result of passage of time, as suggested by certain utility providers.

43. A number of representations objected to the possible construction of Norwich Western Link (NWL) on the grounds of environmental damage.

44. 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. When this particular scheme progresses to a preliminary design for which planning permission and statutory orders can be sought, it will be assessed through the planning application process. When this process is triggered, the environmental effects of the Norwich Western Link will be assessed against the relevant legislative and regulatory requirements and against policies contained in this plan (if adopted) including Policy 3 (Environmental Protection and Enhancement), together with all other material consideration.

45. Regarding the issue of impact of cumulative growth on utilities and transport raised by Breckland District Council, Greater Norwich Authorities are currently working closely with them to address this issue through a Statement of Common Ground.

46. On the issue raised on infrastructure requirements in Hingham, the relevant infrastructure providers have not identified any unmet needs as proportionate to the scale of growth allocated.
47. Over the concern raised on the level of detail identified for Green Infrastructure, no change to Policy 4 is considered necessary as the level of detail is appropriate for a strategic level infrastructure policy.
48. A number of comments have been made with regard to infrastructure in relation to other parts of the plan. The plan has been informed by existing infrastructure capacity and the need for additional infrastructure has informed plan-making.

Conclusions

49. The GNLP has taken into account the strategic level infrastructure requirements of the Greater Norwich area and planned for additional needs. Any future infrastructure requirements or changes in existing need as a result of changes in circumstances will be considered through the Norfolk Strategic Infrastructure Delivery Plan, which is updated on an annual basis to reflect the most significant strategic infrastructure schemes across Norfolk.