

Greater Norwich Local Plan

Hearing Statement

Matter 2 – Vision, objectives and the spatial strategy

Introduction

This Hearing Statement has been produced by Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council as the Greater Norwich Development Partnership (GNDP).

The Document Library for the Greater Norwich Local Plan (GNLP) Examination and further information can be found on the GNLP Examination website:

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The Councils have responded to each question directly in the body of the Hearing Statement.

Issue 1: Have the vision, objectives and growth strategy for Greater Norwich been positively prepared, are they justified and consistent with national policy and can they be realistically achieved? Does the Plan set out a clear spatial strategy? Has the spatial strategy and overall distribution of development been positively prepared, is it justified by a robust and credible evidence base and is it consistent with national policy?

Question 1

Does the Plan adequately set out a vision for Greater Norwich based upon the evidence?

Response to question 1 -

1. Paragraph 151 of the GNLP Strategy ([A1](#)) states that the vision for Greater Norwich is wide-ranging. It is based on evidence and, along with the objectives, has been key to developing policies and monitoring indicators throughout plan-making.
2. Early work on the plan established a concise working version of the vision *“To grow vibrant, healthy communities supported by a strong economy and the delivery of homes, jobs, infrastructure and an enhanced environment”*.
3. This, with six accompanying objectives covering the environment, homes, infrastructure, communities, delivery and the economy (see the response to question 2 below), was agreed at the GNLP meeting in March 2017 (see item 5 of the [report](#) on page 3). The strapline *“Growing stronger communities together”* was also agreed. The report made it clear that the vision and objectives were a work in progress and would include more commentary as the plan developed, with further detail to be provided to reflect emerging evidence.
4. A wide-ranging vision, with objectives, setting out what the GNLP aims to achieve for Greater Norwich to 2038 was consulted on at the Regulation 18C draft plan consultation stage in early 2020. Consultation feedback from stakeholders and the community led to some amendments.
5. The vision in the submitted plan is locally distinctive, with a clear focus on Greater Norwich’s opportunities and constraints as set out in the preceding profile section of the strategy. It has been established as a result of scoping work on relevant higher-level policies and strategies, as well as local evidence studies which were commissioned to inform plan-making. The vision identifies how key planning issues will be addressed through the GNLP and how development will be designed and located to maximise benefits for the area to 2038.
6. The vision’s introductory paragraphs focus on:
 - growth of the low carbon economy, knowledge intensive jobs and the Cambridge Norwich Tech Corridor, including clean energy, agri-food and ICT/digital businesses;

- developing vibrant, healthy, inclusive and growing communities supported by the delivery of new homes, infrastructure and an enhanced environment, making the best of Greater Norwich’s built, natural and historic assets;
 - clean and resource efficient development to help to address climate change, including further improvements to the green infrastructure network.
7. Particular focus is then placed on each of the planning issues which form the basis of the objectives of the plan: the economy; communities; homes; infrastructure; delivery and the environment.
8. All aspects of the vision are evidence based and reflect national policy requirements set in the National Planning Policy Framework (NPPF), regional economic and planning priorities in the existing and emerging New Anglia LEP strategies (see below), the Norfolk Strategic Planning Framework (NSPF), elected members’ priorities and consultation feedback as follows:

Economy

9. The vision and objectives for the economy are consistent with the evidence based New Anglia LEP’s Economic Strategy (NSES, [B18.1](#)) and the emerging Local Industrial Strategy (LIS, [B13.1](#)).
10. The NSES (see pages 12 to 14 of the Economic Strategy) identifies key economic sectors for promotion including: energy; life sciences and biotech; ICT, tech and digital creative; advanced agriculture, food and drink; advanced manufacturing and engineering and the visitor economy, tourism and culture. All of these sectors are included in the vision which emphasises their role in supporting the move towards a post-carbon economy.
11. To help to achieve this, the NSES (see in particular page 28), supported by the Norfolk Strategic Planning Framework (NSPF) ([B2.3](#), see in particular pages 41 to 45), promotes further development of these growth industries on the strategic sites located in Greater Norwich. All these sites are within the Cambridge-Norwich corridor. Growth in the corridor is further supported by the Cambridge Norwich Tech Corridor initiative (see the website [here](#)). The vision therefore promotes significant economic growth in the strategic growth area, with smaller scale employment elsewhere.
12. The vision and objectives are also supported by evidence in the Employment, Town Centre and Retail study (GVA 2017, available in section [B3](#)) which has been updated in the Greater Norwich Employment Land Addendum (Avison Young 2020, [B3.10](#)). The GVA study brings together the various strands of the evidence in its strategy advice ([B3.1](#)) which confirms the growth potential of the economic sectors found in the area and the role of our strategic sites; for example in paragraphs 2.2 and 2.5 and section 6, with the remainder of the report providing more detail to support these conclusions. The Avison Young study provides updates, including the likely impacts of Brexit and Covid, confirming that the evidence-based approach taken to the economy in the GNLP, including its vision, remains appropriate.

Communities

13. The vision focuses on creating healthy, safe, mixed, inclusive, resilient and sustainable communities with good access to local services and new technologies. This reflects the requirements of the NPPF for good quality urban design to create beautiful places. The approach thus reflects good planning as well as local aspirations, having received broad support from elected members, consultees and stakeholders, with particular emphasis on the importance of design supporting healthy and active lifestyles.

Homes

14. The vision envisages meeting the housing needs of different parts of our community through a variety of type, tenure and sizes of homes. This reflects evidence in the Central Norfolk Strategic Housing Market Assessment 2017 ([B22.1](#)), updated for Greater Norwich in 2021 ([B22.3](#)) and in the Gypsies, Travellers, and Travelling Showpeople Accommodation Needs Assessment ([B8.1](#) and [B8.2](#)), currently being further updated.
15. Meeting differing needs in different parts of our area as promoted in the NPPF, to be implemented through GNLP policy 2, are reflected in the vision. It highlights that higher density homes will be provided in the city and district centres, with homes in our suburbs, market towns and villages to be built at appropriate densities to respect and enhance local character.

Infrastructure

16. Throughout plan-making, there was a clear view expressed that housing growth must be supported by improved infrastructure. The vision's focus on providing infrastructure for transport, telecommunications, broadband, utilities, schools and health care needs is reflected in policy 4 and appendix 1 of the strategy. The infrastructure required has been evidenced through the Greater Norwich Local Plan Infrastructure Needs Report (GNLPINR, [B12.2](#)).

Delivery

17. The vision's focus on delivery reflects the NPPF, local evidence and local concerns. The vision emphasises the need to deliver homes, along with supporting infrastructure and environmental improvements, with proactive co-ordination and intervention where required.
18. Evidence from annual monitoring reports on the delivery of homes in recent years is summarised in the GNLP Strategy ([A1](#)) profile (paragraph 52). It shows that housing needs were not fully met in the early years of the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS) plan period, although in recent years the picture has improved considerably. Thus, the vision emphasises the importance of housing delivery to meet needs.

19. The vision’s approach to the delivery of infrastructure, along with environmental protection and improvements, has been based on the NPPF and local evidence studies on issues such as those on general infrastructure needs (GNLPINR, [B12.2](#)) and green infrastructure ([B7.1](#)).

Environment

20. The vision focuses on the need to ensure that development is water and energy efficient and sustainable energy sources are promoted. This reflects the recommendations of the Greater Norwich Water Cycle Study ([B27.2](#), see page 61) and the Greater Norwich Energy Infrastructure Study ([B4.1](#), see page 43). The vision’s focus on improving air quality reflects the fact that there is currently an Air Quality Management Area in the city centre within which measures are being taken to reduce pollution (see the Policy 2 Topic Paper [D3.3](#)).
21. The vision also reflects the long-term policy approach to protect and enhance the distinctive characteristics of our city, towns and villages. The Policy 1 Topic Paper [D3.1](#) (see page 42 in particular) highlights the central role of the green infrastructure network and the protection of strategic gaps and river valleys has and will play in this. This is evidenced through landscape character assessments supporting existing development management policies.
22. The vision’s focus on maximising brownfield development and minimising greenfield losses reflects the NPPF and is detailed in Policy 1 Topic Paper [D3.1](#). Policy 3 of the GNLP requires development to be designed to take account of existing evidence on local distinctiveness and character set out in design guidance supporting development management policies.
23. The importance of further developing our green infrastructure network is strongly emphasised in the vision. Evidence for this includes updates to inform revisions to the existing green infrastructure network mapped in GNLP policy 3, the Greater Norwich Green Infrastructure Study which informs site allocations ([B7](#)) and GIRAMS – the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy ([B6](#)). Emerging evidence to be provided through the Greater Norwich Green Infrastructure Strategy and Delivery Plan will inform further improvements to, and investment in, the green infrastructure network.
24. Most significantly, the vision references the importance of addressing climate change through the plan to contribute to national zero emissions targets, with the environmental evidence studies identified above particularly informing this approach.
25. A limited number of additional modifications to the Regulation 19 GNLP vision have been submitted ([A13](#), appendix C, pages 19 to 20). These provide clarity, reflect stakeholder aspirations from Historic England, Natural England and the Environment Agency and include new government greenhouse gas emission targets which the GNLP will assist in implementing.

Question 2

Are the plan's objectives soundly based and consistent with the vision and the evidence?

Response to question 2 -

26. The plan's objectives reflect its wide-ranging vision. The six core planning issues covered by the objectives, the economy, communities, homes, infrastructure, delivery and the environment, are soundly based, following the content of the NPPF, higher level strategies and agreements and the evidence base (see the question 1 response above). The objectives place a particular emphasis on climate change and the delivery of homes, jobs and infrastructure, reflecting the priorities established through plan-making.
27. Working in tandem with the vision, the objectives provide the context for the policies and monitoring indicators in this plan:
28. The economy objective reflects the NPPF requirement for local plans to set out an economic strategy by implementing Anglia LEP's existing Norfolk and Suffolk Economic Strategy and the emerging Local Industrial Strategy. It also reflects supporting evidence in the Employment, Town Centre and Retail study updated in the Greater Norwich Employment Land Addendum. This objective represents the continuation and development of long-term economic growth trends set out in topic paper 1 on the GNLP strategy ([D3.1](#)). This is part of the wider national picture of economic growth in arcs in central southern and eastern England focussed on Oxford and Cambridge, with growth in the Cambridge Norwich corridor focussed on knowledge based, clean industries (see topic paper 6 on the economy [D3.8](#)).
29. The communities objective directly reflects the vision's focus on growing vibrant, healthy, safe, inclusive communities with good access to jobs, services and facilities, along with the requirements of the NPPF for good quality urban design. Similarly, the homes objective is directly related to the vision and national planning policy requirements in seeking to provide a variety of homes to meet needs.
30. The infrastructure and delivery objectives also supplement the vision, emphasising the importance of infrastructure and housing delivery to serve both existing and new communities and to promote a modal shift in transport use and connectivity. The delivery objective follows the vision and the delivery statement in the GNLP strategy through its focus on intervention mechanisms where the market is unable to deliver.
31. The environment objective is wide-ranging, supporting the vision and reflecting national policy and the evidence base by promoting the protection and enhancement of the built, natural and historic environments and making best use of natural resources. It sets out that the GNLP will play a full part in meeting national

commitments to achieve net zero greenhouse gas emissions, with development adapted to a changing climate.

Question 3

Is the reference to clean growth and progression towards a post carbon economy based upon evidence and is it deliverable?

Response to question 3 -

32. The responses to questions 1 and 2 have highlighted the GNLP's focus on implementing the LEP's regional economic strategies which prioritise clean growth and the progression towards a post carbon economy. Paragraphs 8 to 11 of topic paper 6 on the economy ([D3.8](#)) highlight that the Local Industrial Strategy (LIS) aims for Norfolk and Suffolk to be an exemplar of clean growth and to lead the transition to a post-carbon economy primarily through sustainable food production, sustainable energy generation, ICT/digital industries and high value, clean and green, manufacturing (LIS [B13.1](#) and its [brochure](#)).
33. Paragraphs 4.5 to 4.20 of the updated economic evidence in the Employment Land Assessment Addendum ([B3.10](#)) highlight the wide ranging clusters of knowledge based activities that are found in the area. Such activities provide the basis for clean growth. New Anglia LEP's Economic Strategy (NSES, [B18.1](#)) covers much of the same ground, for example recognising that:
- Norwich Airport is the main base for aviation access to nearby off-shore energy development, and hosts an aviation cluster and the aviation academy (pages 10 and 14);
 - Norwich Research Park (NRP) is Europe's largest single site hub of research, training, education, and enterprise in food and health (page 12);
 - Norwich is recognised in the Tech Nation report and hosts a growing cluster of digital creative businesses, with two leading universities providing the creative and technical talent needed to fuel growth in the sector (page 13);
 - Norwich is home to a significant financial and insurance cluster (page 14);
 - Hethel Engineering Centre is a regional hub for innovation and technology and can expand to meet the demand for incubation space. Businesses and the UEA have developed a new Institute for Productivity (launched in 2021) building on UEA's expertise in business education and engineering (page 14).
34. Delivery of a post carbon economy will be dependent on a wide range of economic factors outside the control of a local plan. The GNLP helps provide the conditions to allow this economic strategy to be implemented. The focus on particular sectors reflects the presence of existing businesses and other activities in these fields and the appropriateness of the employment allocations to support further growth; see for example the conclusion of GVA's strategy advice in [B3.1](#) .

Question 4

Is the focus on the expansion of internationally important knowledge-based industries in the Cambridge Norwich Tech Corridor sound? What other options were considered and why were these dismissed?

Response to question 4 -

35. Supporting the growth of internationally important knowledge-based industries in the Cambridge Norwich Tech Corridor is a sound approach. It is one of the key locations promoted through the Local Industrial Strategy (LIS, [B13.1](#) – see page 55) and is identified as a priority place in the Norfolk and Suffolk Economic Strategy ([18.1](#) NSES brochure page 28), with a particular focus on the growth of advanced manufacturing, agri-tech, life sciences and digital creative industries. Delivery is aided by the [CNTC partnership](#), on which all three councils are represented at Board level.
36. As explained in paragraph 11 of the Policy 6 Topic Paper ([D3.8](#)), the Cambridge Norwich Tech Corridor contains all the strategically important employment sites in the GNLP and is broadly the same extent as the strategic growth area shown on the Key Diagram in the GNLP Strategy ([A1](#)). The corridor contains the whole of the Norwich urban area.
37. As such, the Tech Corridor supports our strongest growth industries and represents a continuation of the long-term economic growth trends set out in topic paper 1 on the GNLP strategy ([D3.1](#)).
38. This strategic economic focus is not to the detriment of other economic sectors or local economic development elsewhere in the plan area, with the GNLP providing a broad supply and choice of land for different economic uses.
39. Consultation early in the plan-making process included six broad options for growth, three of which focussed on the concentration of growth, including the Cambridge Norwich Tech Corridor, while three other options allowed for greater growth dispersal (see topic paper 1 on the GNLP strategy [D3.1](#) paragraphs 69 to 74). Sustainability Appraisal (SA), including the addendum to the Regulation 19 SA ([A6.5](#)) which was produced in September 2021 to provide a clear narrative showing how the plan's preferred strategy and reasonable alternatives to it were shaped over time, covered the different growth options during plan-making.
40. The focus on supporting the economic development of the Cambridge Norwich Tech Corridor is entirely consistent with local economic strategies and initiatives, the NSPF, economic evidence and the existing distribution of strategic employment sites. Not supporting the Tech Corridor could be considered to be unreasonable. It is also consistent with consultation feedback which generally supported a significant element of concentration of growth in the area.

Question 5

Is the Plan strategy consistent with the requirement in the National Planning Policy Framework for plans to support appropriate measures to ensure the future resilience of communities to climate change impacts?

Response to Question 5 -

41. Paragraph 156 of the GNLP ([A1](#)) sets out that the NPPF requires local plans to “*Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts*” and to set strategic policies which address climate change mitigation and adaptation.
42. Paragraphs 24 to 29 of the plan’s climate change topic paper [D3.14](#) highlight how climate change has been addressed through the GNLP, including through the Climate Change Statement following paragraph 157 of the GNLP Strategy ([A1](#)). The statement uses Royal Town Planning Institute and Town and Country Planning Association guidance advising on how to meet the requirements of the NPPF. It focuses on how the GNLP addresses both the strategic location of growth and takes strategic policy approaches on a range of issues to promote the future resilience of communities to climate change impacts through the following key issues:
- Requiring the location and design of development to:
 - deliver the highest viable energy efficiency, including the use of decentralised energy;
 - reduce the need to travel, particularly by private car;
 - secure the highest possible share of trips made by sustainable travel.
 - Support delivery of decentralised, renewable and low-carbon energy generation and grid infrastructure.
 - Shape places and secure new development to minimise vulnerability and provide resilience to impacts from climate change.
 - Encourage community-led initiatives such as the promotion of decentralised, renewable and low carbon energy use or securing land for local food sourcing.
 - Increase sustainable transport use and local transport solutions.
 - Have an effective monitoring regime to ensure evidence on reducing carbon dioxide.
43. Consultation on the plan raised some concerns over how the GNLP will address climate change, with a particular focus being on:
- I. The amount and strategic location of growth;

- II. Monitoring;
- III. Implementation of Norfolk Strategic Planning Framework (NSPF) requirements.

These are addressed in turn below:

- I. The strategic location and amount of housing growth in the GNLP:
 - The plan focusses the great majority of new housing close to every-day services and jobs, thus reducing the need to travel and making it easier to walk, cycle and use public transport. 80% of the GNLP's planned housing growth is in the Norwich Urban Area and the towns. This compares to the current 65% of homes which are in these areas (see GNLP ([A1](#)) Table 7 Page 51). The strategy thus maximises the potential of brownfield sites and promotes more concentration of the population with a consequent positive impact on addressing climate change. Some growth in villages is also necessary to promote the retention of services which can be beneficial in relation to climate change as further service loss will lead to more need to travel for village residents.
 - An appropriate amount of housing growth is included in the plan to meet housing need and to support sustainable economic growth.
 - The great majority of growth is located away from flood risk areas. GNLP policies require development in locations with some flood risk to mitigate that risk.
- II. Monitoring
 - The plan's policies as a whole provide for sustainable growth which, along with national measures on carbon reduction, are intended to contribute to meeting national zero carbon targets.
 - The climate change monitoring in appendix 3 of the GNLP Strategy ([A1](#)) uses the government's annually produced data for each of the three districts. This is the standard data source used nationally which provides the most effective and comparable information. The targets in the plan are intentionally linked to those of the government to reflect the fact that national targets regularly change, so it is appropriate that Greater Norwich should contribute to those national targets. A carbon budget is not required for the plan to meet the legislative requirement to contribute to the mitigation of, and adaptation to, climate change.
- III. The NSPF
 - The GNLP contains policies which cover all relevant aspects of the NSPF 2021 proposals for how local plans in the county should address climate change. This is mainly achieved through the design of development required by Sustainable Communities Policy 2 in the GNLP Strategy ([A1](#)). The policy covers a broad range of issues related to climate change including access to services and facilities, active travel, electric vehicles, energy and water efficiency, flood risk, sustainable drainage, overheating and green infrastructure.

44. It is also important to note that the plan balances the different elements that comprise sustainable development and sets out objectives and policies accordingly. Furthermore, as set out in responses to questions on the strategy and economic development, the plan aims to significantly boost employment in businesses which can play an important role in tackling climate change locally, nationally and internationally.

Question 6

Is it clear which policies in the Plan are strategic, and which are non-strategic?

Response to question 6 -

45. Paragraph 21 of the NPPF states that “Plans should make explicit which policies are strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed”.
46. The issue is specifically addressed in paragraphs 34 and 35 of the GNLP Strategy (A1) which explain that all policies in the GNLP Strategy document are strategic. They further explain that the GNLP Strategy and Sites documents identify and allocate strategic mixed use/housing and employment locations and sites, with non-strategic sites also allocated in the Sites document to help to implement the strategy. The strategic allocation policies in the Sites document are bordered in red and titled Strategic Allocation.
47. Policy 1, including the Key Diagram, identifies a strategic growth area and strategic growth locations. The strategic growth area is defined in paragraph 193 as “The main Cambridge Norwich Tech Corridor area, including Norwich, the North East Growth Triangle, the remainder of the Norwich Fringe, Hethersett and Wymondham”.
48. The strategic growth locations include both the strategic locations in adopted plans such as Area Action Plans and those to be newly allocated through the GNLP. These are:
- I. Strategic Mixed-Use locations
Norwich City Centre, Wymondham, The North East Growth Triangle, Cringleford/Norwich Research Park.
 - II. Strategic Regeneration areas:
East Norwich, the North City Centre.
 - III. Strategic Urban extensions and expanded settlements:
Three Score (Bowthorpe) and Costessey, Easton, Hellesdon, Taverham, Long Stratton and Hethersett.
 - IV. Other strategic employment areas;
Broadland Business Park/Broadland Gate, the Norwich Airport area (including Horsham St Faith), Longwater, Hethel and the Food Enterprise Park at Easton/Honingham.

49. Policy 7.1 provides further detail on strategic sites in and around the urban area. Footnote 108 identifies the broad definition of strategic urban extensions/strategic housing growth locations as providing over 1,000 new homes.
50. The above shows that the whole plan is designed to make it clear which are strategic and non-strategic policies. Furthermore, the plan is clear (in paragraphs 23 to 25 and appendix 4 of the GNLP Strategy) that strategic JCS policies are to be superseded by the GNLP whilst non-strategic development management policies are not being superseded.

Issue 2: Housing Growth

Question 1

Is the identified need of around 40,550 new homes as set out in Policy 1, soundly based and does it accord with national planning policy and guidance?

Response to question 1 -

51. Yes. The local housing need is derived from the government's standard methodology as explained in Appendix 3 of Topic Paper – Policy 1 Growth Strategy [D3.2](#) .

Question 2

Is the settlement hierarchy set out in Policy 1 appropriate and consistent with the evidence?

Response to question 2 -

52. The evolution of the 4-tier hierarchy is explained in the Policy 1 Topic Paper ([D3.1](#)) in particular paragraphs 82-88. The upper three tiers of Norwich urban area, the main towns and key service centre villages, roll-forward the long-standing approach in the adopted JCS. The hierarchy is based on the level of services in the settlement. There is a very clear and obvious difference between the level of services available in the Norwich urban area and the second tier of main towns.
53. For the main towns, Norfolk County Council's market town centre monitoring reports provide an illustration of the level of town centre services (see [latest report 2021](#) particularly Appendix 1). It includes the GNLP's 5 main towns. The level of services recorded in the four larger town centres range from 81 in Aylsham to 157 in Diss. While Long Stratton at 53 has significantly fewer services in its centre than the other four main towns, its elevation was flagged in the JCS and reflects the expectation that the scale of planned housing growth will stimulate service provision. This is then carried forward in the Long Stratton AAP as a central element of its Vision ([C1.10](#) paragraph 1.5).

54. The report also includes two GNLP KSCs with defined centres. Loddon centre, with 37 recorded services, is somewhat smaller than the main towns. While Wroxham and Hoveton has 55 recorded services, nearly all are in the North Norfolk parish of Hoveton.
55. All these places have other services and employment opportunities outside of their centres which reflect their position in the hierarchy.
56. The approach to Village Clusters is explained in the GNLP at paragraphs 188d and 380-381, in paragraphs 92-94 of the Topic Paper – Policy 1 Growth Strategy ([D3.1](#)) and in the response to the Inspectors’ initial questions ([D1.4A](#)) Q8 paragraphs 9-12.

Question 3

Are all of the settlements listed in the correct level within the hierarchy?

Response to question 3 -

57. Yes. Also see the answer to question 2 above. The hierarchy is continued from the adopted JCS and was explained in Figure 5 pages 50-51 of the Regulation 18 Growth Options consultation ([C2.1](#)).
58. A settlement hierarchy that is useful in plan-making must combine places into a limited number of tiers. This process will usually rely on data that is broadly a continuum and the lower down the hierarchy the less obvious the steps between tiers are likely to be. However, settlements in each tier have fewer services than those in the tier above.

Question 4

Is the distribution of growth in line with the settlement hierarchy justified by the evidence?

Response to question 4 -

59. Table 7 Page 51 of the GNLP ([A1](#)) sets out the distribution of growth at each level of the hierarchy and illustrates that the quantum at each level is consistent with its place in the tier. While the proportion of total growth in village clusters is marginally higher than in KSCs, reflecting the much larger number of the former, the percentage uplift within clusters is by far the lowest.
60. Policy 1 Topic Paper ([D3.1](#)) provides background to the distribution of growth and explains how the GNLP continues the long term approach of focussing growth in and around Norwich.
61. The hierarchy reflects local service provision. This is not the only determinant of housing allocations; other factors will include the scale of existing commitment, constraints, and location. For example, settlements that are easily accessible to the

Norwich urban area may support higher levels of provision than other settlements in the same level of the hierarchy. Consequently, there will be settlements that see more or less growth than another settlement higher or lower in the hierarchy.

62. The scale of growth in each of the settlements within the hierarchy is set out in the GNLP (A1) and shows there is actually little overlap between the levels of the hierarchy:

- Policy 7.1 identifies total growth of over 30,000 homes in the Norwich urban area.
- The table for main towns on page 111 indicates that total growth ranges from 727 in Harleston to 2,615 in Wymondham.
- Apart from two outliers, total growth in KSCs ranges from 120 homes in Hingham to 547 in Poringland/Framingham Earl. The outliers are Wroxham with 5 homes and Hethersett with 1,375 homes. The former reflects constraints and the latter the strategically beneficial location and range of local services.
- For Village Clusters in Broadland the maximum scale of new allocation is 60 dwellings (GNLP Strategy (A1) Appendix 5 page 142). Total growth is included under each of the clusters in pages 376-470 of the GNLP Sites Plan (A2). The four village clusters with total growth in excess of 100 homes and overlapping with KSCs are Great and Little Plumstead; Horsford, Felthorpe and Haveringland; Horsham and Newton St Faiths; Lingwood, Burlingham, Strumpshaw and Beighton. The scale of total growth in these four clusters reflects the scale of existing commitment, their range of services and/or their strategically beneficial location in relation to the Norwich urban area and its jobs and services.

Question 5

To what extent does the distribution of housing sites across the settlement hierarchy reflect a policy down approach or one of site availability or previous commitments/allocations?

Response to question 5 -

63. The overall distribution of housing is driven by and reflects the hierarchy and strategy as set out in paragraph 188 to 192 of the GNLP (A1) and illustrated in Table 7 on page 51. It is also explained in the Policy 1 Topic Paper (D3.1) in particular paragraphs 28-30 (see also the answer to question 4 above).

64. The GNLP has a focus on delivery and seeks to “ensure that housing needs to 2038 will be fully met” (Delivery statement, GNLP A1 page 40). Key elements of the strategy to ensure delivery include providing growth opportunities across the hierarchy (taking account of existing commitments), at a variety of site sizes and giving appropriate weight to the deliverability of sites. There is no point in allocating sites that cannot be delivered. Similarly, in some locations suitable sites have not been put forward.

Consequently, the capacity of acceptable sites has some influence on the scale of development at each level of the hierarchy.

Question 6

Is the identification of a supply buffer of 22% against the housing requirement justified?

Response to question 6 -

65. Justification for the additional housing provision to enhance resilience and flexibility is set out in pages 17-18 of Appendix 3 of Topic Paper – Policy 1 Growth Strategy D3.2 and paragraphs 41-43 of the IQL response D1.4A.

Question 7

Is the figure of 1,200 homes assigned to the South Norfolk Village Clusters Housing Site Allocations Local Plan justified?

Response to question 7 -

66. The level of growth is consistent with the strategy as set out in paragraph 188 of the GNLP (A1) and supports village life. The evolution of the approach is further explained in the Policy 7.4 Village Clusters topic paper (D3.12).

67. The response to question 8 in paragraphs 9-19 of the IQL D1.4A explains the much larger scale of the rural area and the consequent need and potential to support village life in South Norfolk than in Broadland. This is reflected in the larger scale of total provision for South Norfolk village clusters.

68. The target of around 1,200 dwellings helps ensure that there will be sufficient growth to support the large number of village communities, their services and informal social infrastructure. The target figure was informed by an initial assessment of the capacity of sites that were likely to be acceptable. The progress on the clusters plan as set out in paragraphs 20-22 of the response to the IQL D1.4A demonstrates that this scale of growth can be delivered.

Issue 3: Economy

Question 1

Is the identified need for around 360 hectares of employment land supported by robust and credible evidence?

Response to question 1 -

69. The economic policy and allocations are supported by extensive evidence from consultants, originally produced in 2017 and updated in 2020. The evidence and its implications are discussed in the supporting text to Policy 6 (pages 87-90) of the GNLP Strategy ([A1](#)) and in the Policy 6 Topic Paper [D3.8](#) which signposts to relevant sections of the evidence.

Question 2

Does the evidence clearly support that the development of 360 hectares will aid the delivery of 33,000 additional jobs?

Response to question 2 -

70. The relationship between jobs forecasts and employment land is particularly discussed in paragraphs 31-36 and 39-40 of [D3.8](#). The topic paper explains how the employment allocations in the plan, largely carried forward from the JCS, provide flexibility and choice, cater for a range of economic sectors and are more than sufficient to meet the evidenced need for around 33,000 jobs.

Question 3

Do the key strategic employment locations set out in Policy 7.1 and Policy 6, together support the vision and objectives of the Plan?

Response to question 3 -

71. The strategic employment locations are a continuation of longstanding policy, including the JCS, consistent with the LEP Economic Strategy and agreed through the NSPF (see paragraph 8-12 of Policy 6 Topic Paper [D3.8](#)). They are well distributed in and around Norwich to provide choice for business and for employees and cater for specific knowledge-based sectors and more general opportunities.

72. They are entirely consistent with the GNLP vision and objectives for the economy ([A1](#) in particular paragraphs 128-131 and paragraph 151 Economy). The vision refers to the key strategic employment sites in general (paragraph 129) and specifically draws attention to the roles of the city centre, Norwich Research Park, the Food Enterprise Park at Honingham, Hethel and the Cambridge Norwich Tech Corridor.

Question 4

Are the key strategic employment locations consistent with the spatial distribution of growth set out in the Plan?

Response to question 4 -

73. All the key strategic employment locations are within the Strategic Growth Area identified on the Key Diagram on page 53 of the GNLP Strategy A1. Paragraph 193 of the GNLP Strategy indicates that the strategic growth area also delivers around 74% of the housing growth. By their nature, key strategic employment locations serve a much wider employee catchment and they also reflect business demand. They are well distributed in and around Norwich to provide choice for business and opportunities for employees.

Question 5

Is the hierarchy of centres as set out in Policy 6 justified by the evidence and consistent with the spatial strategy? Is Policy 6 in respect of development proposals within centres clear and effective?

Response to question 5 -

74. The hierarchy of centres is carried forward from the JCS. There are no recent or planned developments that are significant enough to alter the status of any centres.
75. The policy delivers the requirements of the NPPF and is considered to be clear and effective.