

Greater Norwich Local Plan
Hearing Statement
Matter 3 – Strategy for the Areas of
Growth

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: The Norwich Urban Area including the fringe parishes

A number of sites referred to in this policy including East Norwich Strategic Regeneration Area and Anglia Square will be the subject of separate sessions within the hearing programme.

Question 1

Is the approach set out in Policy 7.1 to focus development in the city centre, in strategic regeneration areas in East Norwich, the Northern City Centre and at strategic urban extensions and urban locations justified by the evidence and consistent with the overall vision, objectives and spatial strategy of the Plan? Is this strategy deliverable?

Response to question 1 –

1. The GNLP Strategy ([A1](#)) sustainably focusses the majority of the growth in the plan in and around the urban area. This is considered to be well-evidenced and to meet the plan's vision and objectives as it maximises the potential for development on brownfield land and accessible greenfield sites, as well as promoting the regional role of the city ([D3.1](#) see paragraph 6a) and sustainable access to jobs and services.
2. The approach of focussing the majority of growth in and around the urban area has been set in previous plans for the Greater Norwich area, most recently the adopted JCS. The GNLP continues, adapts and develops this further.
3. The Norwich Urban Area (NUA) has influence in providing jobs, retail, healthcare and a broad range of services and facilities, as well as homes for a significant proportion of Norfolk's population ([D3.9](#) see paragraph 13). The NUA delivered the largest quantity of housing within Greater Norwich between 2015/16 and 2019/20 ([D3.1](#) see figure 2) and a large number of sites in this area now have permission and/or have or are about to start on site ([D3.1](#) see paragraph 12). The largest proportion of existing homes are within this area and a majority of the population live here ([D3.1](#) see paragraph 16 including figures 3 and 4). The strategy seeks to promote greater concentration of the population in the Norwich Urban Area ([D3.1](#) see paragraph 29).
4. Regarding employment, job increases in Greater Norwich have primarily been in the NUA, especially through expansion at Norwich Research Park and Broadland Business Park. There has been an overall decrease in office space and job numbers in the city centre in recent years, partially due to permitted development office to residential conversions ([D3.1](#) see paragraphs 13 to 15). Norwich City Council is seeking to address this through the implementation of an Article 4 Direction restricting the permitted development right. This will be brought into force on 29 July 2022.
5. By focusing the largest proportion of growth within the NUA, this promotes low carbon objectives reducing the need to travel and making active travel and public transport more attractive and viable options ([D3.1](#) see paragraph 28). The Sustainability Appraisal concludes that this approach '*provides the best balance across a range of*

sustainability objectives and will help to support delivery of the plan ([D3.1](#) paragraph 30 and [D3.9](#) paragraphs 30 to 35). Overall, the proposed strategy promotes more concentration of the population with a consequent positive impact on addressing climate change.

6. In the Regulation 18 Consultation the proposed broad strategic approach gained more support than opposition ([D3.1](#) see paragraphs 42 to 44), and the favoured distribution of growth was for 'Concentration close to Norwich' (see paragraphs 65 to 74).
7. Topic Paper 7.1 Norwich and the Urban Fringe ([D3.9](#)) sets out the evidence relating to the development hierarchy in the plan focused around the Norwich Urban Area. Topic Paper - Policy 1 Growth Strategy ([D3.1](#)) sets out the evidence relating to the development hierarchy in the whole plan area.
8. The strategy is considered deliverable. A large proportion of the major housing sites in the NUA either have consents or are positively and proactively being taken towards obtaining consent. Some proposed allocations are on site and already delivering initial phases. Document [D3.2](#) 'Topic Paper – Policy 1 Growth Strategy – Appendices provides deliverability information for new proposed allocation sites (with GNLP reference numbers) in the Broadland Urban area at pages 28- 31, Norwich at pages 42-51 and South Norfolk Urban area at pages 51-52. Further detail on the delivery of strategic sites, both new and existing allocations, is in appendix 5. A summary for existing sites is provided in a table setting out forecasted delivery for all carried forward/previously allocated sites. This was produced in response to the Inspectors Questions in [D1.3A](#).
9. A following is brief summary of some of the key sites in the NUA:
 - GNLP0506 Anglia Square – following refusal of a previously submitted scheme by the Secretary of State, the site developers are progressing pre-application enquiries for a revised design with substantial consultation with public and statutory bodies. The public consultation website is [here](#) . The delivery statement for this site is document [D2.15](#) .
 - GNLP0360/3053/R10 East Norwich Strategic Regeneration Area – A Masterplan is in progress. Part one has been completed (East Norwich Masterplan Stage 1 Part 1: [D1.4N](#), East Norwich Masterplan Stage 1 Part 2: [D1.4O](#)) and the second phase has commenced. There is active participation from key stakeholders and all landowners are keen to progress development. The Deal Ground/May Gurney site has an extant consent. Delivery statements for these sites are documents [D2.1](#) [D2.2](#) [D2.3](#) and [D2.4](#). Public consultation on the masterplan has been carried out by Norwich City Council. The website is [here](#).
 - GNLP0409AR Whitefriars/Barrack Street has been consented, developers have commenced on site and are delivering units in phase 1. Information submitted for the five year land supply/annual monitoring report ([D1.4F](#) page 10) by the developers Hill Partnerships Ltd. states that 88 homes were under construction in 2020/21. The forecast is for completion of the site in 2023/24.

- R38 Three Score is consented and delivering on site. Information submitted for the five year land supply/annual monitoring report ([D1.4F](#) page 6) shows completions in the past years and forecasts steady delivery rates over the next five years. A delivery statement for this site is document [D2.50](#).
 - CC16 Land adjoining Norwich City Football Club, Kerrison Road is consented and delivering on site. Information submitted for the five year land supply/annual monitoring report ([D1.4F](#) page 14) shows recent completions and ongoing delivery in the early years of the plan. A delivery statement for this site is document [D2.31](#).
 - Taverham GNLP0337R – extensive pre-application work and [community consultation](#) has been undertaken. The developers are working towards submission of a formal planning application very soon. A delivery statement for this site is document [D2.74](#).
 - GNLP0132 Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston – a consortium of developers which are currently delivering on adjacent sites in Sprowston (which were allocated in the Growth Triangle Area Action Plan), have a land option agreement with the landowner and are seeking to progress this site as an additional phase to follow on from their existing sites.
 - HEL2 Land east and west of Drayton High Road, Hellesdon (Royal Norwich Golf Club) – developers have delivered phase 1, commenced on phase 2 groundworks and have entered into pre-application discussions relating to phase 3.
 - TROW1 Trowse - developers have commenced on site and are delivering homes. A delivery statement for this site is document [D2.76](#).
 - EAS1 Land west of Marlingford Road, Easton – this site has been consented and developers have commenced on site. The delivery statement for this site is document [D2.66](#).
10. The JCS Annual Monitoring Reporting 2019-20 [D1.4D](#) reports that in the past two years Norwich City Council area housing delivery has been above target. South Norfolk Council sites in the Norwich Urban Area have been above target 3 out of the past 5 years (since 2015/16). Whilst delivery in the Broadland District Council part of the urban area has been below target in recent years, it is expected that a number of sites in the pipeline will reverse this trend in the coming years.
11. Regarding delivery of the employment strategy, allocations in the NUA largely consist of existing employment sites which are extending and/or intensifying due to the success of their ongoing operations. One employment site which has not previously been allocated is GNLP1061R Norwich Airport site 4. This site shows positive signs of deliverability, having a masterplan endorsed by both Norwich City Council and Broadland District Council. This follows a previous consent which establishes the principle of development and ongoing pre-application discussions with a view to submission of a new planning application in the near future.
12. The retail and leisure strategy for Norwich City Centre has been successful over recent years. It is being updated through the GNLP with increased flexibility in accordance with national legislation and to reflect recent trends to ensure ongoing long-term vitality and viability in accordance with paragraph 86 of the NPPF.

Question 2

Does Policy 7.1 support the city centre's role as a key driver of the Greater Norwich economy and is it consistent with national policies for ensuring the vitality of town centres?

Response to question 2 -

13. Yes, the strategy focusses on strengthening and enhancing the role of the city centre, whilst at the same time allowing flexibility for changes in uses in what will be a time of evolution for town centres.
14. The historic approach to planning for Norwich city centre has embodied the “town centres first” principle for many years. The GNLP’s city centre strategy is intended to continue this approach to ensure success going forward ([D3.9 para 7-8](#)), including adapting to changing trends.
15. A more flexible approach reflecting changes in the economy and national policy will increase other uses such as the early evening economy, employment and cultural and visitor functions in order to enhance vitality and vibrancy. This conforms to paragraph 85 of the NPPF which allows for diversification in order to respond to changes in the retail and leisure industries and the Avison Young Greater Norwich Town Centres and Retail Study Update (December 2020) ([B3.9](#)). The latter sets out that there is an oversupply of comparison goods retail floorspace in Norwich which may mean that some units need to be repurposed to other town centre uses which are compatible in a town centre environment ([D3.8](#) paragraph 28 and [D3.9](#) paragraph 38). There is no need to expand the retail areas/city centre, but the intensification of uses will be fundamental to strengthening the city centre.
16. It is considered that the Primary and Secondary Retail areas in Norwich City Centre are important to its ongoing success, this issue is addressed in detail in response to Matter 3, Issue 1 Question 5 below.
17. Policy 7.1 requires development of housing in the right places in the city centre, which can best be achieved on specific allocated sites. Housing development in the city centre may also include purpose-built student accommodation in accordance with Policy 5. Windfall development ([D3.9](#) paragraph 39) and changes of use through permitted development are also expected. Higher densities of housing in the city centre will increase footfall and add to its vibrancy. This conforms with paragraphs 86 a), d), and f) of the NPPF.
18. As well as encouraging a mix of uses, policy 7.1 section 5 ‘*The Built, Natural and Historic Environment*’ includes criteria-based requirements to promote public realm improvements and to ensure that development respects the character of the city centre conservation area. The Norwich City Centre Future Strategy ([B3.13](#)), prepared by the Norwich Business Improvement District, endorses this approach. It acknowledges that a vibrant, diverse and accessible offer providing a range of different

experiences for the visitor, alongside promotion of a strong and distinctive sense of place and identity, will be key to the long-term economic success of Norwich City Centre.

19. The flexible approach taken to Norwich City Centre seeks to support its continued vibrancy, addressing the challenges of loss of office space over recent years and the impacts of the Covid-19 pandemic and economic change on the retail and hospitality/leisure sectors. Development seeks to make the best use of previously developed brownfield land redeveloped at densities appropriate to the heritage rich environment, often for mixed use development to promote employment and diversity throughout the area.
20. Topic Paper – Policy 6 Economy ([D3.8](#)) sets out the evidence relating to the role of the city centre at the following paragraphs: 9, 12, 17, 19, 20-30, 37 – 38.
21. Topic Paper 7.1 Norwich and the Urban Fringe ([D3.9](#)) sets out the evidence relating to the role of the city centre at the following paragraphs: 7-8, 38-39, 51-70, 79-82, 92-93, 109 (bullet points 1-5), 122-123, 129.

Question 3

Do the sites listed in the East Norwich section of Policy 7.1 on page 106 of the Plan, form part of the East Norwich Strategic Regeneration Area as defined on the proposals map, other allocations on the proposals map, or potential sites for future development? For example is 'Land East of Norwich City FC' site reference CC16 in the Plan?

Response to question 3 -

22. These form potential sites for additional neighbouring development which are likely to benefit from the strategic focus on development in East Norwich.
23. '*Land adjoining the railway between the Deal Ground and Carrow Works*' is currently occupied by a railhead servicing aggregates; this is in ongoing operational use. This area of land does not form part of the East Norwich Strategic Regeneration Area as defined on the proposals map. It is not a separate allocation within the GNLP. Should the aggregates railhead be relocated at a later date the land would be a potential site for future development.
24. 'Land east of Norwich City F.C' is existing/carried forward site allocation CC16. This does not form part of the East Norwich Strategic Regeneration Area; it is an independent site allocation in the GNLP.
25. '*Land owned by Network Rail on Lower Clarence Road and Koblenz Avenue*' is existing adopted site allocation CC13. It was proposed to carry this site forward for residential development in the GNLP, however this has now been formally withdrawn from the plan by Network Rail on 24 November 2021. Network Rail now intend to use this site as improved car parking serving Norwich Train Station.

26. '*Intensification of uses at Riverside*' is existing mixed development including residential, leisure and retail uses. This is in ongoing operational use. This area of land does not form part of the East Norwich Strategic Regeneration Area as defined on the proposals map. It is not a separate allocation within the GNLP. Intensification of uses within this development does not require allocation within the GNLP.
27. '*Regeneration in the Rouen Road area*'. This area of land does not form part of the East Norwich Strategic Regeneration Area as defined on the proposals map. It is not a separate allocation within the GNLP. Rouen Road provides a link between Norwich City Centre and the East Norwich Regeneration Area. It is expected that this area may experience increased use following development at East Norwich, resulting in subsequent regeneration. The eastern boundary of carried forward site allocation CC10 'Land at Garden Street' lies on Rouen Road. Whilst not directly on Rouen Road, sites CC11 'Land at Argyle Street' and CC8 'King Street Stores' are close by. Road.

Question 4

Do sections 1-3 of Policy 7.1 need to be modified in order to reflect the recent introduction of Class E within the Use Classes Order? Are these sections consistent with national policy?

Response to question 4 -

28. Section 1 'Economy' of policy 7.1 is considered to be sound. This position may be further clarified by Norwich City Council's recent confirmation that an Article 4 Direction will be brought into force on 29 July 2022. This will prevent the change of use of offices to residential uses unless planning permission is granted for it by the council.
29. The partnership accepts that an amendment could be made to improve the clarity of this section of the policy. This results from the purpose of the Article 4 Direction not being to resist the conversions of all office to residential per se. Instead, it is intended to enable the management of change where the loss of truly redundant offices is justified.
- Proposed amendment to paragraph 1 of section 1. Economy of policy 7.1:
*To ensure a strong employment base, development should provide a range of floorspace, land and premises as part of mixed-use developments. Development should promote more intensive use of land to meet identified needs for start-up and grow-on space for small and medium sized enterprises including the digital creative industries, technology, financial and cultural and leisure services clusters. To support this, loss of existing office floorspace will be resisted **unless it can be demonstrated that its loss will not be of detriment to Norwich's office economy.***

30. Section 2 'Retail and main town centre uses' of policy 7.1 is in accordance with Class E of the Use Classes Order, this policy wording does not seek to disregard the flexibility of uses possible under Use Class E. The wording provides a policy position for other uses within this section which fall under other use classes such as Class C, Class F and Sui Generis uses. The issue of consistency with national policy relating to 'Primary and Secondary Retail Areas' in this section is addressed in detail in the response to Question 5 of Matter 3, Issue 1 below.

31. Section 3 'Leisure, culture and entertainment and the visitor economy' of policy 7.1 is generally consistent with Class E within the Use Classes Order, this section also provides policy position for uses which fall under Sui Generis uses such as theatres, night clubs, cinemas and drinking establishments which do not fall under Class E. This policy is written to support the vitality of the City Centre and appropriate compatible uses outside of the permitted development under new use class E. However, the partnership accepts that restricting leisure uses to a defined Leisure Area boundary and leisure uses not having a detrimental effect on retail offering is no longer consistent with the NPPF and should be revised including omission of reference to this boundary. Suggested change: *Leisure uses, including uses supporting the early evening economy, will be accepted within the defined city centre leisure area where noise and disturbance issues can be mitigated and where they do not have detrimental effect on the retail offering, especially in the primary retail area*

- **are compatible with the surrounding uses**
- **would not give rise to unacceptable amenity and environmental impacts which could not be overcome by the imposition of conditions and**
- **would not have a detrimental impact upon the character and function of the city centre or undermine its vitality and vibrancy.**

32. Following adoption of the GNLP, development management policies will undergo a review. The extent of the Late-Night Activity Zone (LNAZ) as defined in adopted Development Management policy DM23 'Supporting and managing the evening and late-night economy' and the adopted policies map will be part of this review. It should be noted that it is considered that retaining an LNAZ is fundamental due to issues around crime and disorder as well as noise and disturbance within a city centre where more residential use is encouraged. The retention of the LNAZ is supported by Norfolk Constabulary ([D3.9](#) see paragraph 109).

Question 5

Does Policy 7.1 need to be modified to replace references to primary and secondary retail frontages with 'Primary Shopping Areas'?

Response to question 5 -

33. As detailed in paragraph 2.2, bullet point 2 of the Greater Norwich Town Centres and Retail Study Update (December 2020) ([B3.9](#)), the NPPF has deleted the requirement for local authorities to define primary and secondary retail frontages in the

development plan. The new NPPF still requires authorities to define town centre boundaries and primary shopping areas. Paragraph: 002 Reference ID: 2b-002-20190722 of the Planning Practice Guidance states that “*Authorities may, where appropriate, also wish to define primary and secondary retail frontages where their use can be justified in supporting the vitality and viability of particular centres*”.

34. Norwich City Council Development Management policy DM20 defines Primary and Secondary Retail areas which are monitored annually. Whilst Norwich City Council acknowledges that there will be a need to review DM20 and other retail policies following the adoption of the GNLP to allow for greater flexibility and to ensure that the policies are in line with the NPPF and the GNLP, it is the intention to retain primary and secondary retail areas and frontages. However, there will be a need to review the boundaries of both the primary and secondary retail areas to better reflect their character and the way that they function.
35. Policy 7.1, section 2 ‘Retail and main town centre uses’ paragraph 2 refers to ‘*primary and secondary retail areas*’, this approach supports the ongoing monitoring of the areas enabling evidenced based informed decision making in the vibrancy of the high-street in the city centre as a whole, rather than just in the primary retail areas. The differentiation between primary and secondary shopping areas in Norwich reflects the physical and economic geography of what is a very large city centre. Both serve important and inter-related functions, but they are different. This comprehensive approach to planning has enabled the ongoing relative success of the centre and goes beyond simply the consideration of Use Class E.
36. It is considered that Norwich is justified in defining primary and secondary retail areas/frontages in accordance with the PPG for the following reasons as evidenced in the Norwich City Council ‘Shopping floorspace monitor – July 2021’ ([B3.12](#)) and the Norwich City Centre Future Strategy ([B3.13](#)) prepared by Norwich Business Improvement District:
- The primary area contains the shopping centres and main comparison goods stores. This area has a lot of chains, though unfortunately a number of these have been lost during the past 2 years. This has contributed towards a vacant floorspace figures of 14.5% and vacant units of 15.2%.
 - The secondary retail area includes streets which provide a specialist mix of shops and town centre uses. This area has performed well (if the Cathedral Retail Park, which has different characteristics, is excluded). By providing independent retail diversity and by adapting rapidly, it appears that it is performing well and has actually remained very resilient during the pandemic. This can be shown by the low vacancy rates within both the secondary retail area (when excluding the Cathedral Retail Park) and the Magdalen Street, Anglia Square and St Augustine’s Large District Centre (LDC) where vacancy rates are only 6.7% and 7.0% which is extremely low when compared to a national average retail vacancy rate of 15.8% and the city centre retail vacancy rate of 14.1%.

- Norwich Lanes and much of the secondary retail area is not only fundamental to Norwich's economy but it helps make Norwich unique and contributes to its sense of place.
- The COVID pandemic has accelerated trends that were already occurring with more people for example shopping online. In order to increase footfall and to get more people back into the city centre there is a need to create an experience that they cannot get online. Part of this will be about public realm improvements and creating an environment where people want to be. One of the reasons why the secondary retail area has been so resilient is that it offers a shopping experience that makes people want to come into the city as the same experience cannot be achieved by shopping online. There is a really good mix of independent retailers, restaurants and cafés which makes this area unique.
- The Norwich City Centre Future Strategy prepared by the Norwich Business Improvement District endorses this approach. It acknowledges that a vibrant, diverse and accessible offer providing a range of different experiences for the visitor, alongside promotion of a strong and distinctive sense of place and identity, will be key to the long-term economic success of Norwich city centre.

Question 6

Do the site-specific requirements in Policy 7.1 relating to the East Norwich Strategic Regeneration Area duplicate those set out in Policy GNLP0360/3053/R10?

Response to question 6 -

37. The strategic requirements in Policy 7.1 relating to the East Norwich Strategic Regeneration Area do not duplicate verbatim those set out in the site allocation policy. However, there is some crossover in content, with a greater degree of detail in the site specific policy. The strategic policy is intended as a framework for the detailed site allocation policy.

Issue 2: The Main Towns

Question 1

Policy 7.4 (relating to Village Clusters) includes an exception sites policy for affordable housing led development, but Policy 7.2 (relating to Main Towns) does not. What is the reason for this approach and is it justified?

Response to question 1 -

38. The Plan is written to positively promote the use of rural exception sites, as seen at Policy 7.4. However, the Partnership does and would support exception sites in settlements higher up in the settlement hierarchy, including Main Towns. This approach to exception sites accords with national policy and is in existing development management policies for Broadland and South Norfolk. Development management

policies in Broadland and South Norfolk both give support to exception sites adjacent to established development boundaries.

39. The GNLP does not propose any changes to the existing settlement boundaries.

Question 2

Is Policy 7.2 otherwise justified, effective, and consistent with national policy?

Response to question 2 -

40. It is considered that Policy 7.2 is justified, effective and consistent with national policy.

41. As is summarised in the Policy 7.2 Topic Paper ([D3.10](#), paragraphs 29-32) the Regulation 18A consultation justified the approach taken to the Main Towns. This consultation in 2018 led to reaffirming the Main Towns as the second tier of the settlement hierarchy, after the Norwich Urban Area. Regulation 18A also established that in the more rural parts of Greater Norwich a minimum level of growth should be sought to maintain and enhance the vitality of these smaller settlements, and added that the baseline growth in the Main Towns should be 550 homes in addition to the 5,468 homes already committed ([C2.1](#) Appendix 1).

42. The effectiveness of the approach to the Main Towns is shown in the site assessment work that has been completed (Aylsham [B1.14](#), Diss [B1.15](#), Harleston [B1.16](#), Long Stratton [B1.17](#), and Wymondham [B1.18](#)). The sites chosen for allocation in the Main Towns are deliverable over the plan period, and this is further evidenced in the work completed to agree the Site Allocation Statements of Common Ground/Delivery Statements ([D2.77-2.91](#)).

43. The Main Towns Topic Paper ([D3.10](#)) shows that the approach to the Main Towns is justified, effective, consistent with national policy and accords with the principles of sustainable development. Paragraph 86 states that “*Of the 187,500 homes in the plan area, 10% of the existing homes are in the Main Towns. Directing 14% of housing growth to the Main Towns is considered compatible with these settlements being important service centres and centres of employment that also provide services for their wider hinterlands.*” Furthermore, as is stated in Policy 7.2 of the GNLP Strategy ([A1](#)), there is a total deliverable commitment of 6,806 homes and employment allocations totalling 58.2 hectares.

Issue 3: The Key Service centres

Question 1

Policy 7.4 (relating to Village Clusters) includes an exception sites policy for affordable housing led development, but Policy 7.3 (relating to Key Service Centres) does not. What is the reason for this approach and is it justified?

Response to question 1 -

44. The Plan is written in such a way to positively promote the use of rural exception site, as seen at Policy 7.4. However, the Partnership does and would support exception sites in settlements higher up in the settlement hierarchy, including Key Service Centres. This approach to exception sites accords with national policies and in existing development management policies for Broadland and South Norfolk. Both development management documents give support to exception sites adjacent to established development boundaries.
45. The GNLP does not propose any changes to the existing settlement boundaries.

Question 2

Is Policy 7.3 otherwise justified, effective, and consistent with national policy?

Response to question 2 -

46. It is considered that Policy 7.3 is justified, effective and consistent with national policy.
47. As referenced in paragraph 5 of the Topic Paper on Policy 7.3 Key Service Centres (KSC) ([D3.11](#)), the NPPF includes the social objective of accessible services and the environmental objective of minimising pollution. These objectives can be met by locating housing growth where there is ready access to jobs and services, to provide what the NPPF terms '*sustainable solutions*'. As set out at paragraph 10 of the Topic Paper on Policy 7.3 Key Service Centres (KSC) ([D3.11](#)), KSCs are defined as having a good range of services, typically: a primary school; a secondary school either in or accessible from the settlement; a range of shops and services (including convenience shopping but more limited than in main towns); a village hall; primary health care and a library.
48. Therefore, this level of services can support and be supported by housing growth and is in accordance with the objectives of the NPPF.
49. Paragraph 9 of the NPPF also recognises the need to take local circumstances into account to reflect the character, needs and opportunities of each area. The Plan recognises this (see paragraphs 11-12 of the Topic Paper on Policy 7.3 Key Service

Centres [D3.11](#)). Specific opportunities and constraints in each KSC have been taken account of in determining the plan's strategy for each settlement.

Issue 4: Village Clusters

Question 1

Is Policy 7.4 in respect of additional sites justified and effective? Is there a limit to how many such schemes could be allowed within one village?

Response to question 1 -

50. Policy 7.4 of the GNLP Strategy ([A1](#)) states that additional sites may be provided in villages clusters in two different ways. Firstly, through infill development within settlement boundaries and secondly, through affordable housing led development. The latter may include an element of market housing (including self/custom build) if necessary, for viability, up to a maximum of 15 dwellings in total.
51. In respect of these additional sites, it is considered that Policy 7.4 is justified and effective as it is an appropriate strategy with a proven track record of delivering additional housing. The approach to allowing infill development within settlement boundaries is tried and tested and allows additional windfall development to come forward to support the vitality and viability of rural settlements. Policy 1.3 of the South Norfolk Development Management Policies DPD (2015) ([C1.8](#)) and Policy GC2 of the Broadland Development Management Policies DPD (2015) ([C1.3](#)) provide current policies allowing infill development within settlement boundaries.
52. The promotion of affordable housing led development adjacent or well related to settlement boundaries is an important way to facilitate the delivery of affordable housing in rural communities where any allocations may not otherwise be large enough to provide a significant element of affordable provision. Again, rural exceptions affordable housing schemes are a tried and tested method of provision which enables rural communities to continue to grow and thrive and allows an opportunity for younger people to stay in the communities in which they grew up near to family and friends. The concept is supported by Policy 3.2 of the South Norfolk Development Management Policies ([C1.8](#)) and reference to the Joint Core Strategy and national policy in the Broadland Development Management Policies ([C1.3](#)).
53. Policy 7.4 does not set a limit on how many such schemes could be allowed in one village, but it does state that the cumulative amount of windfall development permitted during the plan period should not have a negative impact on the character and scale of settlements in any village cluster. It is considered that the impact of such schemes will vary dependent upon the nature of the settlement and the specific proposal being put forward. For this reason, rather than setting a limit through the policy, this matter would be better considered at the planning application stage.

Question 2

Is it clear what the ‘Greater Norwich Local Plan Sites Plan’ referred to in the policy is? Is this simply the Greater Norwich Local Plan ie the submitted plan?

Response to question 2 -

54. The ‘Greater Norwich Local Plan Sites Plan’ referred to in the policy relates to Part 2 of the submitted Greater Norwich Local Plan which deals with site allocations. It is accepted that it is probably simpler and more accurate for the policy to just refer to the Greater Norwich Local Plan and the authorities would be happy to make an additional modification to that effect.

Question 3

How does this policy relate to Policy 7.5?

Response to question 3 -

55. Policy 7.4 allocates growth on specific sites within village clusters to provide a minimum of 4,220 homes as set out in both policy 1 and policy 7.4. Through the policy additional sites may be provided by infill development within settlement boundaries or affordable housing led development schemes adjacent or well related to settlement boundaries. These will contribute to the housing commitment as part of the separate windfall allowance identified in Policy 1.

56. Policy 7.5 is complementary to Policy 7.4 and as stated in paragraph 389 of the GNLP Strategy allows for a further limited number of dwellings to come forward as windfall in each parish beyond those allocated or allowed as larger scale windfall sites through other policies in the plan. These dwellings are included as part of the housing commitment through a separate figure in policy 1 and will allow an element of flexibility and provision of housing in rural areas to support rural life and village vitality in settlements which otherwise would not see new housing growth within the plan period.

57. Further information explaining how Policy 7.4 relates to Policy 7.5 can be found in the Topic Paper - Policy 7.5 Small scale windfall ([D3.13](#)), particularly paragraph 7 which explains how a proactive windfall policy has been included at Policy 7.5 to support the village clusters approach in Policy 7.4 and to provide choice and flexibility in provision.

58. Both Policies 7.4 and 7.5 promote self and custom build.

Question 4

Would Policy 7.4 encourage new dwellings to be constructed in locations that are poorly served by public transport, services, and facilities? Would it be consistent with national policy in this regard?

Response to question 4 -

59. Policy 7.4 would not encourage new dwellings to be constructed in locations that are poorly served by public transport, services, and facilities.
60. The whole approach to the allocation of new sites within Village Clusters has been based around sustainability. Each village cluster is based around primary school catchment areas to act as a proxy for social sustainability. Paragraph 386 of the GNLP Strategy ([A1](#)) states that *'To reduce additional car journeys and encourage healthy and active lifestyles, new housing allocations have been preferred on sites within village clusters with good access to a primary school and a safe route to school'*. The evolution of the Village Clusters approach is set out in Topic Paper – Policy 7.4 Village Cluster ([D3.12](#)) which states at paragraph 32 that *'the scale of growth in any cluster will reflect school capacity or ability to grow, plus the availability of other accessible services'*.
61. Although a safe walking route to the catchment primary school was one of the key criteria in site selection, regard was also had to the proximity of other services and facilities within the cluster as set out in the site assessment methodology ([B1.1](#)) and the Broadland village cluster site assessment booklets (References [B1.28 – B1.47](#)). As discussed in the site assessment methodology, the Housing and Economic Land Availability Assessment (HELAA) was the starting point for the site assessment process, which included a category for access to services. This was considered to be a key criteria in the initial discussion of submitted sites and any sites which scored a red for accessibility to services in the HELAA were cautiously sifted out at an early stage in the process.
62. With regard to the provision of the additional sites allowed through Policy 7.4, these will be on infill sites within existing settlement boundaries, or adjacent or well related to settlement boundaries in the case of affordable housing led development. These will therefore inherently be focused on locations with good accessibility to public transport, services, and facilities.
63. The approach to Policy 7.4 is considered to be consistent with national policy as set out in paragraph 9 of the Topic Paper – Policy 7.4 Village Clusters ([D3.12](#)) in that its aim is to promote sustainable development in rural areas in locations where it will enhance or maintain the vitality of rural communities, identifying opportunities for villages to grow and thrive, particularly where this will support local services.

Question 5

Will this policy apply in the area covered by the South Norfolk Villages Clusters Housing Allocations Local Plan?

Response to question 5 -

64. Policy 7.4 will apply in the area covered by the South Norfolk Village Clusters Housing Allocation Local Plan (South Norfolk VCHAP).
65. In relation to the provision of housing, this is shown in both Policy 1 and Policy 7.4 of the GNLP Strategy ([A1](#)). The table in Policy 1 includes an existing deliverable commitment of 1,392 dwellings and a minimum of 1,200 new dwellings in South Norfolk to contribute to the overall total for Village Clusters of 4,220 dwellings as referenced in Policy 7.4. Policy 1 clearly states that specific allocations for villages in South Norfolk will be in the South Norfolk VCHAP. In addition, Policy 7.4 specifically references that new sites to provide a minimum of 1,200 homes will be allocated through a South Norfolk Village Clusters Housing Allocations Local Plan.
66. This is also explained in the Topic Paper – Policy 7.4 Village Clusters ([D3.12](#)) at paragraph 40 which states that *'The GNLP Strategy document sets a minimum of 1,200 new homes in South Norfolk to ensure the overall housing requirement is met'. The South Norfolk VCHAP will need to allocate for this number of homes in accordance with policy 7.4 and other policies in the GNLP Strategy.'*
67. The other elements of Policy 7.4 (additional sites and employment) will also apply to the area covered by the South Norfolk Village Clusters Housing Allocation Local Plan. Indeed paragraph 387 of the GNLP Strategy states that *'Policies 1 and 7.4 also support windfall development for affordable housing in the village clusters in both Broadland and South Norfolk, with some market housing permitted where it supports viability, including self/custom build. The policies allow for infill and small extensions in those parts of villages clusters which have a settlement boundary'*. The authorities would consider a modification to the plan to clarify this if it is not clear as currently written.

Question 6

Has any allowance been made within the housing trajectory for such windfall sites?

Response to question 6 -

68. The detailed housing trajectory that accompanies Topic Paper – Policy 1 Growth Strategy (Appendix 4 [D3.2A](#)) includes a windfall allowance that stems from the 5 year land supply statement. An explanation of the evidence which supports the assumed windfall contribution can be found on the response to Inspectors Initial Question 17 ([D1.3](#)). Appendix 6 of the GNLP Strategy ([A1](#)) explains how from 2025 onwards a

continued windfall allowance of 100 dwellings per year is expected which translates to the figure of 1,296 dwellings in Policy 1. There is no specific allowance within the trajectory or Policy 1 for the windfalls in Policy 7.4; these are included in the 1,296 figure.

Question 7

Is Policy 7.4 otherwise justified, effective, and consistent with national policy?

Response to question 7 -

69. It is considered that Policy 7.4 is justified, effective and consistent with national policy.
70. It is considered to be justified as it presents an appropriate strategy for the delivery of housing in the more rural parts of the plan area, through allocation, infill development within settlement boundaries or affordable led housing schemes. It is considered to be effective as it will facilitate the delivery of housing over the plan period to 2038. As stated in paragraph 79 of the Topic Paper – Policy 7.4 Villages Clusters ([D3.12](#)) the number of homes proposed on newly allocated sites in villages clusters is 4,220 which represents about 9% of the total housing growth and is a 9% increase on existing stock. This is considered to be an appropriate figure when compared against the overall growth strategy which focusses the great majority of growth in the Norwich Urban Area and towns.
71. The Topic Paper – Policy 7.4 Village Clusters ([D3.12](#)) gives more detail on the evolution of the Village Clusters approach and the alternatives that were considered through the various stages of public consultation. As stated in paragraph 80 of the Topic Paper, in an area such as Greater Norwich an element of residential growth in villages is important to sustain rural vitality and support existing services and facilities in villages, as well as providing opportunities for local people to get a home in the village where they grew up.
72. The national policy context for Policy 7.4 can be found in paragraphs 77-79 of the NPPF (2019) as set out in paragraphs 9 and 10 of the Topic Paper ([D3.12](#)).

Issue 5: Small scale windfall housing development

Question 1

To what geographical area would Policy 7.5 apply? Would it apply to land on the edges of Village Clusters, Key Service Centres, or Main Towns? Would it apply to land within the South Norfolk Village Clusters Housing Site Allocations Local Plan?

Response to question 1

73. As stated in paragraph 389 of the GNLP Strategy ([A1](#)), this policy applies to all parishes. Norwich City Council area is unparished, so the policy applies to the rest of

the plan area i.e. the whole of Broadland and South Norfolk including parishes that make up Village Clusters, Key Service Centres and Main Towns.

Question 2

Would Policy 7.5 encourage new dwellings to be constructed in locations that are poorly served by public transport, services, and facilities? Would it be consistent with national policy in this regard?

Response to question 2 -

74. Topic Paper [D3.13](#) provides justification for Policy 7.5 including elements of national policy with which it complies. Paragraph 19 explains that many of the sites allowed under this policy can be expected to have reasonable access to local services. Any lack of access must be balanced against the national and local objectives to support rural life and village vitality. There will be circumstances where development outside a development boundary has better access than infill sites within it. The scale of growth allowed in any one place is *de minimus* as is the likely cumulative scale of growth that, in the context of a rural area, does not have reasonable access to services

Question 3

What does 'positive consideration will be given to self and custom build' mean in the context of the policy? Is this necessary? Is this justified? Is this an effective approach?

Response to question 3 -

75. Where there are competing proposals, self and custom build would be a positive material consideration. The approach is justified by the national requirement to promote self and custom build housing. It is necessary as otherwise the opportunity provided by the approach will be undermined. The authorities would support a modification to clarify the approach if this makes it more effective

Question 4

Is the policy effective in the way in which it would work? Is it justified that the policy allows 100% market housing?

Response to question 4 -

76. As explained in the Policy 7.5 Topic Paper [D3.13](#), the authorities consider that the policy will be very effective in providing very small scale opportunities for housing in rural settlements. Under national policy, sites of 1 to 3 or 1 to 5 dwellings cannot be subject to S106 requirements to provide affordable housing. Affordable housing led development outside the development boundary is separately promoted in Village Clusters under Policy 7.4.

Question 5

Are the caps on development within each parish capable of operating effectively in the event that multiple applications are lodged around the same time?

Response to question 5 -

77. As set out in the response to IQL Question 28 in paragraph 110 of [D1.4A](#), 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 6

Is the assumed contribution of 800 dwellings from this source justified?

Response to question 6 -

78. The justification for the expected delivery of 800 dwellings is set out in paragraph 8 of the Policy 7.5 Topic Paper [D3.13](#) and paragraphs 111-112 of the IQL response [D1.4A](#).

Issue 6: Preparing for new settlements

Question 1

Policy 7.6 does not relate to provision in this Plan and as paragraph 395 states this Plan identifies enough sites to meet current needs. On this basis, is Policy 7.6 justified? What justification is there for any reference at all to proposals which may or may not form part of a future plan?

Response to question 1 -

79. Experience nationally and locally demonstrates that very large-scale development, such as new settlements, takes many years to come forward. This undermines the ability to demonstrate delivery and bring forward new settlements through the local plan process. The intention of Policy 7.6 is to overcome this constraint. Although there is no commitment to any scheme, by flagging up the potential in this plan cycle it is intended to provide sufficient certainty to allow promoters to make investment decisions in the preparation of evidence to promote potential sites. The authorities recognise that all reasonable alternatives for growth will need to be considered for the next local plan and this is implicit in the Policy. Providing a level of commitment to address the issue in this Local Plan makes it more likely that a new settlement (if selected) can make a significant contribution in the next plan period.

80. The three proposals mentioned in the text have all been identified as reasonable alternatives in the preparation of this GNLP.

Question 2

The supporting text to Policy 7.6 indicates that, whilst there are enough sites to meet needs in this plan period, the delivery of new settlements may occur from 2026 onwards. This is only 4 years from the adoption of this Plan. Does the evidence support that delivery could really be that soon after the adoption of this plan? What effect would this have on land supply in the plan period given that a significant buffer has already been included in the housing provision in the Local Plan including a contingency site.

Response to question 2 -

81. At the time of submission there was a potential for delivery to commence by 2026. Government had been expected to introduce revisions to the planning system intended to significantly speed up the local plan process and also signalled the need to increase the delivery of housing.
82. While the potential for commencement by 2026 is looking much less likely, it is not impossible. It is understood that promoters have been continuing to work on the development of proposals. For example, one of the potential schemes has recently been the subject of [consultation](#) by the promoters.
83. The impact on land supply would depend on the start date, delivery rates and the scale of the new settlement that could be delivered in the plan period. It is a function of overlapping plan periods that delivery of any new allocations included in the next Local Plan review, at any time prior to 2038, would increase land supply in this plan period. In broad terms every 2,000 dwellings delivered in a new settlement would amount to around one year's supply at current rates of need.