

Mike Burrell
Greater Norwich Local Plan Manager
Norwich City Council

Sent via email

Dear Mr Burrell,

Greater Norwich Local Plan

The scheduled hearing sessions on the Local Plan have now been completed. We would like to thank your team for their contributions to the sessions and the conduct of the examination generally.

As set out in the hearing sessions, there are a number of main modifications required to the Plan in order for us to consider it sound and legally compliant, without prejudice to our final conclusions on the Plan as a whole. The majority of these main modifications have been communicated either in the sessions themselves or via the Programme Officer. Thank you for your work on finalising the draft wording of these main modifications under our direction.

The following is a list of other policies that require main modifications which we would like you to incorporate in the list of main modifications already prepared. More detailed reasons for these modifications will be set out in our report.

Policies

Policy 7.6 Preparing for New Settlements

This policy conflicts with the housing evidence submitted in support of the plan and is not consistent with the strategic policies of the plan. The policy would create uncertainty and is not necessary to enable any future review work to take place post adoption of the plan. The policy is not justified and should be deleted.

Site Allocations

Policy GNLP0360/3053/R10 East Norwich Strategic Regeneration Area

The Submitted Plan indicated that this site could accommodate around 4000 dwellings in the plan period. During the examination the Partnership asked us to reduce that capacity to 3362. In the light of the evidence presented to us, we consider that the capacity of the site for the plan period should be around 3000. This is principally because we consider that there is no convincing evidence before us that the Utilities Site is likely to come forward in the plan period.

Policy CC2 147-153 Ber Street Norwich

Evidence presented by the Partnership at the examination indicated that this site is no longer available for development. The allocation should be deleted.

Policy CC13 Land at Lower Clarence Road Norwich

Evidence presented by the Partnership at the examination indicated that this site is no longer available for development. The allocation should be deleted.

Policy R2 Ipswich Road Community Hub, 120 Ipswich Road, Norwich

Evidence presented by the Partnership at the examination indicated that this site is no longer available for development. The allocation should be deleted.

Policy GNLP 2143 South of Le Neve Road, Marsham

This proposed allocation site lies adjacent to a Grade 1 Listed church and other listed buildings are located near to the site. The site would jut out into the open setting of the church, would largely obscure important views of it and would significantly harm its setting. We consider that the policy is not justified and that the allocation should be deleted.

Policy GNLP 3003 Mill Road, Reedham

We consider that there is insufficient evidence before us that a safe and suitable vehicular access can be achieved. The allocation should be deleted.

Policy GNLP0503 Land north of Springfield Way and west of Dereham Road, Hingham

Evidence presented by the landowners during the examination indicated that the site is now longer available for development and is unlikely to come forward during the plan period. The allocation should be deleted.

Policy HEL4/GNLP1019 Land north of Reepham Road, Hellesdon

Evidence presented to the examination indicated that the site is not available and unlikely to be available during the plan period. The allocation is not justified and should be deleted.

Policy GNLP5081/2043 Costessey Contingency Site

We do not consider that the trigger mechanism set out in the policy is effective nor could reasonably be made effective by modification. In any case, we consider that with modifications, there would be sufficient land supply to meet the housing requirement set out in the Local Plan. The housing land supply position will need to be kept under review and the Local Plan will be subject to a review within 5 years of adoption in accordance with the provisions of the National Planning Policy Framework. The proposed contingency site is therefore not justified, and the allocation should be deleted.

Gypsy and Traveller Site Allocations

Following the recent hearing sessions, we consider that main modifications should be made to allocate the following sites all of the which have been proposed by the Partnership and have been the subject of consultation:

Policy GNLP5019 Land north of Shortthorn Road, Stratton Strawless

Policy GNLP5020 Romany Meadow, The Turnpike, Carleton Rode

Policy GNLP5024 Land off Upgate Street, Carleton Rode

Policy GNLP5022 Land at the Oaks, Reepham Road, Foulsham

Policy GNLP5028 A and B Land at Strayground Lane, Wymondham

Policy GNLP5004R Land off Buxton Road, Eastgate, Cawston

Policy GNLP5027 Brick Kiln Road, Hevingham

Policy GNLP5013 Ketteringham Depot, east of Station Lane, Ketteringham

Next steps

We will continue to liaise with the Partnership, through the Programme Officer on the preparation of the schedule of main modifications. The Partnership will need to consider consequential changes to the Local Plan that may arise. The final version of the main modification schedule should be provided to us for comment before being made available for public consultation.

The Partnership should ensure that they have met the requirements for sustainability appraisal by producing an addendum to the Sustainability Appraisal of the submitted plan in relation to the main modifications as appropriate. We would like to see a draft of this addendum before it is published. There is also a need to prepare an update to the Habitat Regulation Assessment and again we would like to see this before publication. Both the SA and the HRA should be published as part of main modification consultation.

The Additional Modifications (AMs) which the Partnership is preparing are solely a matter for the Council. Ideally these should be published but it be made clear that these changes are not for the Inspectors to consider. We would like sight of the final draft of the AMs, for information, before consultation.

The MM consultation should be undertaken for a minimum of 6 weeks and only relate to the MMs. At this stage we would expect the issues raised in the MM consultation to be dealt with by written representations, and we do not anticipate further hearing sessions.

Please post this letter on the examination website. We are not inviting any comments on it from other parties. Comments can be made through the consultation on the proposed main modifications. If the Partnership has any queries about its content, please contact us through the Programme Officer

Mike Worden and Thomas Hatfield

INSPECTORS

9 August 2023