

Greater Norwich Development Partnership Board Meeting Minutes

Date: Thursday 24 June 2021

Time: 2.00pm

Venue: Virtual meeting

Board Members:

Broadland District Council:

Cllr Sue Lawn, Cllr Ian Moncur, Cllr Shaun Vincent (Chairman)

Norwich City Council:

Cllr Mike Stonard, Cllr Alan Waters

South Norfolk Council:

Cllr Florence Ellis, Cllr John Fuller, Cllr Lisa Neal

Norfolk County Council:

Cllr Barry Stone, Cllr Martin Wilby

Broads Authority

Cllr Melanie Vigo di Gallidoro

Officers in attendance: Trevor Holden Phil Courtier, Jonathan Pyle, Helen Mellors, Phil Morris, Graham Nelson, Matt Tracey, Richard Doleman, John Walchester, Judith Davidson and Marie-Pierre Tighe.

1. DECLARATIONS OF INTEREST

The Chairman advised the meeting that through his consultancy Abzag, he was promoting, on behalf of the landowner, a site for residential development in Colney through the Greater Norwich Local Plan. When this site was under consideration he would declare a disclosable pecuniary interest and shall vacate the chair and leave the room.

In the interests of transparency, he also brought to the Board's attention, that his father, Malcolm Vincent, through his company Vincent Howes, was promoting, on behalf of the landowners, a site for residential development in Costessey/Bawburgh through the Greater Norwich Local Plan. In this case under the provisions of the Code of Conduct, there was no interest to declare which would prevent him from participating in the debate and chairing the meeting.

He added that he would be declaring the same interests when chairing Broadland District Council's Cabinet and at Council when GNLP matters were

considered.

Cllr John Fuller and Cllr Barry Stone advised the meeting that they were members of the Royal Norfolk Agricultural Association.

2. APOLOGIES FOR ABSENCE

Apologies were received on behalf of Cllr Stuart Clancy.

3. MINUTES

The Minutes of the meeting held on 16 December 2020 were agreed as a correct record.

4. QUESTIONS FROM THE PUBLIC

The following four questions, and the officer responses to them, had been received from members of the public.

Bryan Robinson

My various queries on the housing numbers in the Reg. 19 representations were not answered and therefore I wish to submit the following question.

The Household Projections between 2018 and 2038 as set by the Government in the Table 406 for the 3 districts of Greater Norwich is 29,954. This figure is adjusted by a separate local affordability adjustment for each district to give the Housing Need. This establishes the base figure of 40,541 for Greater Norwich for 2018 to 2038. The Reg. 19 proposes further contingencies, buffers and windfalls to set a delivery target of 52,646 homes over this period which is 76% above the Household Projections. The reason given is to ensure sufficient homes are available to ensure growth targets. The Council Response to Main Issues states "*if the anticipated economic growth is not delivered the homes above the housing need will not be delivered as there will not be a market for them*" for which the 76% overall contingency above the Household Projections seems excessive. Also the ratio of new jobs: homes since 2008/09 as the AMR figures is 1 : 1.08 but that set out in Reg. 19 is 1 : 1.5 meaning that there is an overprovision based on historic evidence. Based on the previous ratio 35,640 homes would be required for the 33,000 jobs over the 20 year period.

If it is acknowledged that market forces will prevail and past performance ratio of jobs and homes suggest a lower number of homes is sufficient to meet the anticipated economic growth (jobs), what is the justification for this overprovision of homes?

Officer response

The Government's standard methodology provides the base position and identifies a need for 40,541 homes in the plan period. Typically, some sites take longer to develop than envisaged and some planning permissions are not implemented. To ensure that housing needs are met in full and a steady supply of sites is available, the plan identifies at least 10% additional provision. Such

provision provides replacement opportunities and choice to ensure delivery of the 40,541 homes needed; it is not necessarily expected to be additional growth. In total, the GNLP identifies opportunities for 49,492 homes. The additional uplift within this total provides greater certainty of delivering need and also ensures that faster economic growth and a larger number of jobs than the trend-based target can be supported. This uplift will also address the possibility of higher levels of household growth as indicated in the Office for National Statistics 2018 projections. Comparing the ratio of jobs to homes for different time periods is not necessarily a useful indicator as it will be affected through time by demographic change, the performance of the local economy and changes to work patterns such as commuting flows and home working.

Dr Catherine Rowett

In Appendix 11a of the papers, the GNLP have responded to each submission on the Norwich Western link (NWL) road that the NWL is solely a Norfolk County Council (NCC) infrastructure scheme. However, the NWL is included in the plan in these places in the Regulation 19 draft plan: section 3 “the vision and objectives for Greater Norwich” at para 138 (“By 2038 our transport system...will include the Norwich Western Link ...”); at para 243 (“Strategic transport improvements in policy 4 include ... the Norwich Western Link”; and under Policy 4 on page 81 (“delivery of the Norwich Western Link road”).

If the NWL is solely an NCC project, will the GNLP remove all the above references to the NWL from the plan? And if not, why not?

Officer response

The Norwich Western Link is not an allocation in the GNLP. The plan recognises the scheme as part of a wide-ranging package of proposed strategic transport improvements provided by a range of bodies with transport responsibilities. These also include trunk road schemes and rail enhancements. It is appropriate to identify such schemes and proposals in the local plan as they affect the strategic context for growth and development.

The NWL would be delivered by Norfolk County Council. As the NWL progresses to a preliminary design for which planning permission and statutory orders can be sought, it would be assessed through the planning application process. An application for planning permission for the NWL would be determined in accordance with the development plan prevailing at the time, and the environmental effects of the NWL would be assessed against the relevant legislative and regulatory requirements and against the policies contained in the GNLP (if adopted) including the environmental policies contained in Policy 3 (Environmental Protection and Enhancement), together with all other material considerations.

David Pett, Stop the Wensum link campaign

In Appendix 11a of the papers, the GNDP have responded to each submission on the Norwich Western link (NWL) road with the proposition that the NWL is solely a Norfolk County Council infrastructure scheme and that the planning, habitats, environmental, climatic and other impacts of the NWL do not need to be considered in the GNLP making process. As in the SWL submission at the Regulation 19 consultation, the NWL is clearly included in the GNLP whilst pretending not to be. For example, paragraphs 139 and 243 of the Regulation 19 document, without doubt, identify the NWL as a deliverable of Policy 4 of the plan. The Plan is unsound at several levels in including the NWL in this misleading way and attempting to delegate impacts of the NWL, which should be assessed by the GNLP's sustainable appraisal and environmental assessments, to other governance and planning realms.

Will the GNDP chair share with the GNDP Board, the legal advice which GNDP has taken on the above, so that members are fully aware of the legal risks involved before agreeing at recommendation 1 "that the Greater Norwich Local Plan is sound and to submit the plan to the Secretary of State for independent examination"?

Officer response

As in the answer to Dr Catherine Rowett above.

It is not considered that the references to the Norwich Western Link in the GNLP raise any legal risks to the plan.

Dr Andrew Boswell, Climate Emergency Planning and Policy (CEPP)

In September 2019, climate lawyers ClientEarth, who litigate in the UK and around the world, wrote to the Greater Norwich planning authorities about the need to integrate carbon emissions reduction objectives throughout the GNLP local plan policies. This was followed by ClientEarth consultation responses at Regulation 18C (March 2020) and Regulation 19 (22nd March 2021): the Regulation 19 response noted "none of the issues raised in our response to the Regulation 18 consultation appears to have been addressed", and found the plan unsound and not legally compliant. In response (Appendix 11a of papers, page 420, GNDP have responded "The GNLP conforms to legislation and national planning policy and guidance, and, subject to the above, has had regard to climate change issues".

Will the GNDP chair share with the GNDP Board, the legal advice which GNDP has taken on the above, so that members are fully aware of the legal risks involved before agreeing at recommendation 1 "that the Greater Norwich Local Plan is sound and to submit the plan to the Secretary of State for independent examination". ?

Officer response

The objectors have given their opinion that the plan is unsound and not legally compliant. It is for the Planning Inspector to assess whether this is the case. Having reviewed the relevant legislative and policy requirements, we are

comfortable that the GNLP has been positively prepared to address climate change within the proper legislative framework and that the plan does what we are legally required to do. This is reflected in our statement on Climate Change in Section 4 of the GNLP. In addition, we are confident that the plan expresses some quite ambitious objectives about how land use can contribute to delivering improvements in our carbon performance.

5. SUBMISSION OF THE GREATER NORWICH LOCAL PLAN (GNLP)

The report set out the main issues raised through the Regulation 19 stage of plan-making. It concluded that the representations had identified no significant issues, in principle, that could not be addressed or were such a risk to the GNLP that it should not be submitted in the near future. The recommendation provided the caveat that submission of the plan was subject to progress being made on key issues relating to protected habitats and Gypsy and Traveller sites.

Graham Nelson reminded members that this plan-making process had started in 2015 when the Board made the decision to draft a replacement for the Joint Core Strategy, which would be a significantly larger undertaking, as it would include not only the strategic approaches and policies to be applied across Greater Norwich but also the significant scale sites that would deliver the growth need required for the area.

The plan-making process commenced in spring 2016 with a comprehensive call for sites exercise. This was followed by a consultation in early 2018 on growth options site proposals and a further consultation at the end of 2018 on new revised and small sites.

Throughout this process the plan had taken shape through engagement with developers, communities and interest groups and the level of concerns expressed had tended to diminish as the plan progressed.

The publication of a White Paper that proposed a radical overhaul of the planning system and the Government's reiteration that the current round of local plans in development had to be adopted by 2023 had led to the Board deciding to accelerate its plan-production to the Regulation 19 stage. This work culminated in a full draft plan, which was consulted upon over its soundness and legal compliance in early 2021.

At all the earlier stages of this process the plan was being shaped through consultation and engagement with communities and interested parties. At this stage the final plan is presented and a decision is required of the Board and the constituent councils about the soundness and legal compliance of the plan, before its submission to the Secretary of State for Public Examination.

Overall, 1,316 representations were made on the plan (263 in support and 1,053 objections), but in officers opinion no representations had been made that would require further Regulation 18 consultation or a repeat of the Regulation 19 stage. However, some representations had raised issues which had to be addressed

before submission, in particular, with Natural England on protecting key habitats from increased visitor pressure due to growth. This would be addressed through a Statement of Common Ground in relation to the mitigation necessary to protect sites under the Habitat Regulations.

Ongoing work was also required to proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified need.

Legal advice had confirmed that the above issues did not make the plan unsound.

The other recommendations in the report were procedural and would allow the planning inspector to make any main modifications necessary to make the plan sound and legally compliant. The modifications would be reported back to each authority to ensure that they were satisfactory.

A member advised the meeting that, as the Chair of the Duty to Cooperate Board, he could confirm that utility companies were aware of the proposed growth areas in Greater Norwich and were focused on delivering the infrastructure to meet this need.

In respect of green infrastructure he was pleased that an accommodation was to be arrived at with Natural England, but he suggested that this was a first stage that should be bolstered with greater governance and clarity of approach and to be aware about what must be done in each area so that it was proportionate to growth. He also welcomed a commitment to a review in the future.

In respect of Village Clusters, he advised the meeting that this was currently out for Regulation 18 consultation, with over 400 sites being considered across 120 parishes. Seventy sites were now preferred and a further 15-20 were seen as reasonable alternatives. He noted that custom build homes were only a small proportion of houses proposed and over the whole of Greater Norwich it was only around 7 percent of dwellings.

In regard to Gypsy and Traveller sites he suggested that need be assessed and apportioned across each local authority in a fair and equitable way, possibly in proportion to the housing numbers of the general population.

In general he suggested that the plan was sound and proportionate and that it laid the groundwork for the next plan and any decision that might need to be made regarding a new settlement in the future.

In response to a query, it was confirmed that the concern raised by Natural England was in regard to the mechanism in place to give effect to protecting habitats, rather than the Policy itself. It was intended that the Statement of Common Ground would address this issue. It was emphasised that it would not require any amendment to the plan.

A member advised the meeting that the City Council's Sustainability Development Panel had raised some concerns about the timescales and

outcomes regarding Gypsy and Traveller sites in the plan. The concerns raised by Natural England had been noted and it was welcomed that this was close to being resolved and that a review would be undertaken. The Panel would also be requesting further information about water resources, as raised by the Environment Agency, although it was also noted that mitigation was to be put in place. Finally the difference in approach to housing allocations between the City and Broadland and South Norfolk was raised as a possible area where the plan could found unsound.

A member confirmed that the City Council was happy with the plan and he emphasised the importance of getting it agreed by each constituent authority and submitted by the due deadline. In respect of recommendation 2 he emphasised the importance of identifying need for Gypsy and Traveller sites and of treating all communities in Greater Norwich equally.

Another member noted that South Norfolk was to invest a six figure sum to enhance a Gypsy and Traveller transit site. He suggested that all three authorities should work together to deliver transit sites to relieve pressure on both the settled and the travelling community.

The Chairman called for a show of hands and it was unanimously:

AGREED

To recommend member councils to:

1. Agree that the Greater Norwich Local Plan is sound and to submit the plan to the Secretary of State for independent examination subject to an agreement in principle being reached with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations;
2. Commit to proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs in accordance with the criteria-based policies of the current and emerging Development Plans;
3. Agree to request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant;

and,

4. Delegate authority within the councils to:

- a. agree minor modifications to the GNLP prior to its submission

and,

- b. negotiate any main modifications necessary to make the GNLP sound as part of the Independent Examination.

The Chairman thanked officers for all their hard work in bringing together the GNLP to its submission stage.

6. REGULATION 19 GREATER NORWICH LOCAL PLAN (GNLP) – REPORT 2: SUBMISSION ARRANGEMENTS AND COMMUNICATIONS PLAN

The report described the arrangements for submission of the GNLP to the Secretary of State and the proposed communication plan.

The Chairman called for a show of hands and it was unanimously:

AGREED

To endorse the approach to communication to partner authorities.

7. TRANSPORT FOR NORWICH STRATEGY REVIEW

The report provided an update on the work to review the current transport strategy for Norwich. It set out the scope of the work, the progress to date and the timeline to adoption.

The Board was advised that the current Norwich Area Transportation Strategy was adopted in 2004 and set out a transportation strategy for the Norwich area, until 2021 and was, therefore, overdue for a refresh.

A review of governance was to be undertaken that would focus on the Transforming Cities Joint Committee and it was suggested that this work be brought to the Board in regular updates.

This first update covered the scoping work being carried out which would begin with the establishment of an officer working group from the three Greater Norwich local authorities and Norfolk County Council. The group had an important role in bringing the work forward and provided a regular opportunity for officers from all partners to steer the development of the work and resolve issues.

The review of the Strategy would have three outputs;

- The Transport for Norwich Strategy
- An Action Plan to accompany the Strategy
- A Sustainability Appraisal report.

The emerging themes in the Strategy were:

- Norwich and Norfolk (supporting LTP4 objectives)
 - A Zero Carbon future
 - Improving the Quality of our air
-

- Changing attitudes and behaviours
- Supporting Growth Areas
- Meeting Local Needs
- Reducing the dominance of traffic
- Making the Transport system work as one (integration of modes)
- Long Term investment
- Making it Happen (governance)

A consultation would take place later in the summer, followed by analysis and final Strategy preparation when it would be brought back to the Board for consideration and input ahead of final adoption at the end of the year. Alongside the consultation there would be a series of member workshops.

In response to a question about longer term joint working on transport issues beyond the projects in the Strategy, Matt Tracey acknowledged that there was work to be done regarding the governance structure of the Committee, which could be looked at once the Strategy had been adopted.

In answer to a query about emerging policy themes, such as zero carbon and improving air quality taking more prominence in the Strategy, it was confirmed that officers were working on putting more detail behind these themes and as part of the refresh of the Strategy some of these themes would be prioritised. The geography of transport in Greater Norwich would also play a significant role as increasingly the move away from cars was encouraged and the full use of public transport returned following the pandemic.

It was confirmed that there was no stipulated end date for the Strategy, which would be an ongoing project.

The Chairman suggested that a timetable might help drive forward priorities given the host of technological changes that were being developed.

The Chairman called for a show of hands and it was unanimously:

AGREED

To note the form and progress on development of the strategy and endorse the approach to developing the Transport for Norwich Strategy.

The meeting closed at 3.04pm
