

Greater Norwich Development Partnership

Date: Tuesday 19 June 2018

Time: 2.00 pm

Venue: Council Chamber, Broadland District Council

Board Members:

Broadland District Council:

Cllr Ian Moncur

Cllr Andrew Proctor

Cllr Shaun Vincent

Norwich City Council:

Cllr Paul Kendrick

Cllr Mike Stonard

Cllr Alan Waters

South Norfolk Council:

Cllr Charles Easton

Cllr John Fuller

Cllr Lisa Neal

Norfolk County Council:

Cllr Stuart Clancy

Cllr Tim East

Cllr Martin Wilby

Broads Authority:

Melanie Vigo di Gallidoro

Officers:

Phil Kirby

Phil Courtier

David Moorcroft

Graham Nelson

Debbie Lorimer

Tom McCabe

Vincent Muspratt

Marie-Pierre Tighe



NORWICH
City Council



Norfolk County Council



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AGENDA

	Page No
1. To receive Declarations of Interest	
2. Apologies for Absence	
3. Minutes of the meeting held on 19 June 2018	3 – 19
4. Matters arising therefrom (if any)	
5. Questions	
To consider any questions received from members of the public in accordance with the Board's Terms of Reference.	
6. High level report on the Regulation 18 Consultation on the Greater Norwich Local Plan	20 – 49
7. Revised timeline for the Greater Norwich Local Plan	50 – 58

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Please call Mike Burrell, Greater Norwich Planning Policy Manager on 01603 222761 or email mike.burrell@norfolk.gov.uk in advance of the meeting if you have any queries regarding access requirements.

Greater Norwich Development Partnership Board Meeting Minutes

Date: 20 November 2017

Time: 1.00 pm

Venue: Council Chamber, Broadland District Council, Thorpe Lodge, 1 Yarmouth Road, Norwich, NR7 0DU

Board Members:

Broadland District Council:

Cllr Andrew Proctor, Cllr Shaun Vincent (Chairman)

Norwich City Council:

Cllr Paul Kendrick, Cllr Mike Stonard, Cllr Alan Waters

South Norfolk Council:

Cllr Charles Easton, Cllr John Fuller, Cllr Lee Hornby

Norfolk County Council:

Cllr Stuart Clancy, Cllr Tim East, Cllr Judy Oliver

Broads Authority

Paul Rice

Officers in attendance: Amy Broadhead, Mike Burrell, Phil Courtier, Richard Doleman, Angela Freeman, Ellen Goodwin, Tim Horspole, Dave Moorcroft, Phil Morris, Graham Nelson, Adam Nichols 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's Place Shaping Panel and when as a Member of Broadland District

Council's Cabinet and Council GNLP matters were considered.

Cllr John Fuller declared a non-pecuniary interest as a director of an employment site at Seething.

2. APOLOGIES FOR ABSENCE

Apologies were received on behalf of Cllr Ian Moncur, Cllr Martin Wilby and Sir Peter Dixon.

3. QUESTIONS FROM THE PUBLIC

The following questions were submitted to the Board:

Cllr Lesley Grahame

'The draft consultation offers only one transport policy option: 'Broadly continue the current approach to encourage public transport improvements, [and] walking and cycling improvements'. However, in the section on strategic transport issues, all the specific schemes mentioned were road building or road improvement projects. If policy was to favour public transport, walking and cycling, why was there no mention of existing public transport projects - for example the proposed rail station at Broadland Business Park or the Bus Rapid Transit corridors - or any number of possible strategic cycle links, while no fewer than six specific road schemes were listed?'

Officer response:

There were two questions in the consultation seeking views on the approach to transport issues.

The first, question 36, covered strategic transport connections that shaped the growth of the area, recognising the work of other bodies in promoting improvements. One of the suggested consultation drafting amendments to be considered at this Greater Norwich Development Partnership Board meeting recognises that the work on promoting rail enhancements needed to be referenced.

The second question, question 37, was seeking opinions on the local approach to promoting sustainable transport to support the growth that would be promoted in the GNLP. The GNLP is not the transport plan for the area, but would need to reflect the close inter relationship of development and transport.

Local measures to promote sustainable transport in the area in and around Norwich would be considered through the review of the Norwich Area Transportation Strategy. Norfolk's adopted 3rd Transport Plan provided the strategy and policy framework for the remainder of the area up to 2026.

Cllr Denise Carlo

The draft Regulation 18 consultation document is deeply disappointing and it does not address the challenges of the 21st century which include climate change.

The sections on climate change and transport were particularly weak and the contribution of transport to greenhouse gas emissions continues to be ignored. In its ninth annual assessment (June 2017), the Committee on Climate Change reported that emissions from transport and building stock were rising and effective new strategies and policies were urgently needed to ensure emissions continue to fall in line with the commitments agreed by Parliament.

Would the GNGB agree to re-draft the Plan and put climate change at the heart of achieving sustainable development to include a transport strategy based on achieving a major modal shift to sustainable transport modes, traffic reduction and no further new strategic road infrastructure?

Officer response:

This was not the draft Local Plan, but was a consultation on issues and options for the Plan. The consultation had questions on specific issues referred to in the question to seek views on how they should be tackled in the Plan.

Question 36 covered strategic transport issues, question 37 sustainable transport and question 52 the Plan's approach to climate change. The consultation allowed for the points raised in the question to be made. It was not considered necessary to re-draft the consultation document.

Cllr Simeon Jackson

The settlement hierarchy is a mechanism designed to promote development in places where it is most appropriate and sustainable, with good access to services. Paragraphs 4.152-4.158 state that the GNDP is considering combining the three village and rural categories in the settlement hierarchy to form 'village clusters', meaning that development is likely to be allocated even in villages with no services, and no non-car access to services. However, no evidence is provided for why this might be desirable, and the consultation document fails to address the impact that choosing such an option could have on the delivery of other GNLP objectives.

Please could the GNDP explain what evidence it had used to arrive at this option (as opposed to any number of other possible changes to the hierarchy), and how it is compatible with option TRA1 and paragraph 6.42, which state that policy must meet the objective to reduce reliance on the private car?

Officer response:

This was a consultation which asked questions about the possibility of using village clusters as an approach to the lower tiers of the settlement hierarchy. The consultation asked for evidence and views as to whether this could be a suitable approach.

Parish Cllr Andrew Cawdron

The Spatial Portrait of Greater Norwich (paragraph 2.21) on air quality says 'achievements in air quality are being achieved by road infrastructure changes'. Where is the evidence base or measurement locations and records to validate this statement? Norwich does not even record particulate levels.

Officer response:

To provide a little bit of extra context, paragraph 2.21 of the Growth Options consultation document referred to the Air Quality Management Plan for the City Centre and referred to other initiatives in addition to road infrastructure changes. It also stated that air quality was an important issue with more work to be done.

The Norwich City 2016 Air Quality Annual Status Report (ASR) is the most recent available evidence on air quality in the City Centre. The ASR stated on pages 3 and 4 that 'A good example of improvement in air quality resulting from the traffic changes in the city is the work done to implement new road layout and junction arrangements in the Chapelfield area of Norwich.... Triplicate diffusion tube monitoring was carried out for a full year prior to the scheme commencing, and had continued since. As a result of the changes, the annual mean NO₂ concentration had reduced from 60.9µg/m³ in 2013 to 43µg/m³ in 2015.'

Sections 3.2.2 and 3.2.3 of the ASR set out the particulate monitoring that was carried out.

The 2017 Air Quality Annual Status Report was in production. Earlier ASRs were available on the Norwich City Council website and the 2017 report would be available in the near future.

**Jenn Parkhouse
Wensum Valley Alliance**

With regard to paragraph 6.169
: 'Landscape protection policies generally work well' - relatively few applications because of high chance of refusal', would you please provide evidence to support this claim, e.g. number of claims, areas concerned and benefiting from which type of protection, number refused, etc.

Officer response:

Paragraphs 6.165 to 6.168 of the Growth Options document set out the landscape protection areas and policy tools used to protect them. The key areas were:

- gaps between certain settlements such as between Wymondham/Hethersett and Hethersett/Cringleford;
- a corridor either side of the A47 around the south of Norwich;
- a corridor either side of the NDR in the Growth Triangle in Broadland;
- rural river valleys and urban valley fringe landscape areas including significant parts of the Yare and Wensum Valleys.

While some limited erosion to protected landscapes had taken place, the great majority of the protected areas remain undeveloped.

There were two potential means of assessing success – applications not made and applications refused. Unfortunately it was not possible to quantify the number of development proposals and planning applications that had not been submitted as a result of the designations.

In relation to planning applications in the Strategic Gaps, three applications were refused in South Norfolk in 2015/16, although two of these were subsequently approved on appeal, totalling about 10 hectares. No planning applications were received for land in the A47 Protection Zone in 2015/16.

Many of the designations had been in place for a significant period of time and the areas that they had sought to protect remain substantially undeveloped. Consequently, it was reasonable to conclude that this strong policy approach had been effective.

4. GREATER NORWICH LOCAL PLAN REGULATION 18 CONSULTATION GROWTH OPTIONS

The Greater Norwich Planning Policy Team Manager gave a presentation on the main consultation on the Greater Norwich Local Plan (GNLP).

The GNLP was a joint Local Plan, which was comprised of the Strategy and Sites, but excluded the Development Management policies for Broadland, Norwich and South Norfolk up to 2036.

The GNLP was being produced at this time as part of a five year review cycle, which was good practice and to ensure a 15 year supply of housing land.

The GNLP would play a key role in driving forward the economy by ensuring that homes, jobs and infrastructure was provided; whilst also safeguarding the environment.

The Consultation was scheduled to be held from 8 January 2018 to 15 March 2018.

It was emphasised that the consultation posed questions; not answers, and would be open to both technical respondents and the general public.

There would be clear signposting for the consultation; with a series of roadshows and events to encourage a wide variety of respondents, who could comment in whatever level of detail they wished. Respondents would also be able to make their comments online.

It was likely that the key issues would be: delivery, housing numbers, growth options (distribution), infrastructure, green belt, new settlement, settlement hierarchy, sites, topic policies e.g. design, affordable housing and environmental protection.

The evidence base for the Plan would be made up of a wide variety of studies including: viability, flood risk, economy/retail/town centres and a Sustainability Appraisal.

The next stages would involve an analysis of consultation responses, which would then inform the evidence base for the publication of the Regulation 19 Plan in summer 2019, with final adoption by end 2020.

Members were advised that following consideration by the respective panels of each local authority seven amendments to the GNLP Regulation 18 Growth Options document had been proposed (attached at Appendix 1 to these Minutes).

There was also a proposal to reduce the affordable housing percentage requirement on sites, due to a higher delivery of affordable housing in the period up to March 2017 (attached at Appendix 2 to these Minutes).

RESOLVED

to agree the proposed amendments to the Greater Norwich Local Plan Regulation 18 Growth Options document.

Cllr Tim East advised the meeting that he had concerns regarding the provision of healthcare especially in large settlements and would wish to see this issue dealt with more robustly in the document. He also would like to see the protection of the Wensum and Yare River Valleys extended to their tributaries as well. He also requested that a clearer differentiation be made between social housing and housing for people with disabilities, as 28 percent of residents in Greater Norwich were disabled.

In response, it was confirmed that Health Impact Assessments were a requirement of large scale housing proposal in the current policy and question 63 in the Growth Options document asked if this requirement should be included in the GNLP. Work had also been undertaken with healthcare providers on a Norfolk Health protocol, so they would be aware of the impact of growth across Greater Norwich.

Members were advised that work on the Norfolk Health Protocol had been concluded in September 2017 and would be considered again by the Norfolk Member Duty to Co-operate Forum in January 2018. Health England have been invited to attend the meeting.

In respect of the tributaries of river valleys and disabled dwellings; it was suggested that these issues could be raised through the consultation.

In response to a query regarding the Site Proposals document, it was confirmed that this was an extract of sites that had been assessed for possible inclusion in the GNLP. The full document would eventually list all of these sites, with maps and a written summary of each village. Any further sites would come through the consultation process.

Cllr Alan Waters raised four issues about the overall scale of growth, distribution options and recognition of the role of Norwich, lack of detail proposed about delivery and time it has taken to produce the GNLP and implications of detailed member involvement and these were in a note he had prepared. At the meeting the Norwich City Head of Planning handed copies of the note to members of the public. Immediately after the meeting Cllr Waters submitted the detailed note on these issues which is appended to these Minutes.

In response to the issue of the housing allocations number being calculated by including a ten percent delivery buffer, Cllr John Fuller noted that this figure would be supplemented by windfall developments. It was also noted that the housing numbers had been amended following proposed changes in Government policy.

Cllr Andrew Proctor noted that all the Strategic Growth Options were worth due consideration.

RECOMMENDED TO THE CONSTITUENT AUTHORITIES:

The Board recommends that the constituent authorities:

- approve the “Greater Norwich Local Plan Regulation 18 Growth Options” document for public consultation;
- delegate authority to the Greater Norwich Development Partnership Directors in consultation with the Greater Norwich Development Partnership Chair to:
 1. Make any minor corrections and presentational changes to the Growth Options paper; and
 2. Sign off the Site Proposals and Interim Sustainability Appraisal documents for public consultation.

The meeting closed at 13.54 pm.

Schedule of Proposed Amendments to GNL Reg.18 Growth Options Document.			
Source	Paragraph / Figure / Alternative / Page	Proposed Amendment	Officer recommendation
Broadland DC	Figure 5, page 61	Minor amendments to Tiers 3, 4 and 5 of the Settlement Hierarchy to remove unneeded text as shown in appendix A below	Amend as proposed
Broadland DC	Figure 6, page 63	Amendment to Tier 4 of the Settlement Hierarchy to include a description of Village Clusters from elsewhere in the document as shown in appendix B below	
Broadland DC	Alternative AH7, page 89	Additional text on sub-division of garden plots adjacent to village boundaries in Option AH7 as shown in appendix C	
Norwich CC	Paragraph 6.38, page 76	Include text on planned strategic rail improvements as shown in appendix D. Make consequential changes to subsequent paragraph numbers and text.	
Norwich CC	Questions 25 to 28, page 63	Clarification of linked questions 25 to 28 on Village Clusters by amalgamating them into 1 question as shown in appendix E. Make consequential changes to subsequent question numbers and text.	
South Norfolk	All references to Village Clusters	Change the use of the term "Village Clusters" to "Village Groups" throughout the document to minimise the potential for confusion with other clusters, such as schools and GP clusters.	
South Norfolk	Paragraph 4.66, page 38	Amend text to clarify content of figure 3 as shown in appendix F.	

The main views expressed by the EDT Committee Norfolk County Council were: the need for a clear covering document aimed mainly at the general public to signpost the main issues and questions in the consultation; and the need to take full account of health issues in the plan.

Appendix A

Figure 5 Proposed settlement hierarchy – Option SH1

Hierarchy tier	Locations and settlements	Criteria and growth considerations
1. Norwich Urban Area	Norwich, the built-up parts of the fringe parishes of Colney, Costessey, Cringleford, Trowse, Thorpe St Andrew, Sprowston, Old Catton, Hellesdon, Drayton and Taverham and the remainder of the Growth Triangle.	<p>Defining criteria Access to a full range of high level and day-to-day services and employment opportunities.</p> <p>Growth considerations Therefore suitable for infill (within defined development boundaries) and housing allocations, the scale of which would be dependent on site availability, the growth option chosen and local environmental and infrastructure considerations.</p>
2. Main Towns	Aylsham, Diss (including Roydon), Harleston and Wymondham	<p>Defining criteria Local access to range of day-to-day services and employment (schools; healthcare facilities; retail, including a supermarket; comparison goods shopping; a range of employment; other services; and frequent public transport).</p> <p>Growth considerations Therefore suitable for infill (within defined development boundaries) and housing allocations, the scale of which would be dependent on site availability, the growth option chosen and local environmental and infrastructure constraints.</p>
3. Key Service Centres	Acle, Blofield, Brundall, Hethersett, Hingham, Long Stratton, ¹ Loddon/Chedgrave, Poringland/ Framingham Earl, Reepham and Wroxham	<p>Defining criteria Local access to some services and employment opportunities (a primary school; an accessible secondary school; healthcare facilities; day-to-day retail and services; local employment; frequent public transport).</p> <p>Growth considerations Therefore broadly suitable for infill (within defined development boundaries) and housing allocations, the scale of which would be dependent on site availability, the scale and range of local services (higher levels of growth would tend towards locations with a secondary school); the growth option chosen; access to Norwich; and local environmental constraints.</p>
4. Service Villages	See Appendix 3	<p>Defining Criteria A Service Village must have:</p>

¹ As stated in paragraph 4.45 and 4.148, Long Stratton is currently a KSC, but with the planned growth it is anticipated that the consequent growth in services will make it a Main town

		<p>Access to four key services (accessible primary school², village hall, food shop and journey to work by public transport).</p> <p>Or</p> <p>Availability of at least six services from a menu of 12, which must include an accessible primary school. The other services are: post office, village hall; food shop; pub; pre-school facilities; petrol station; outdoor recreation; community groups; employment; healthcare facility; journey to work by public transport.</p> <p>Growth considerations</p> <p>Service Villages would be suitable for:</p> <ul style="list-style-type: none"> • infill within (potentially enlarged) development boundaries; and • Housing allocations, the scale of which would be dependent on the growth strategy chosen, the scale and range of local services, and the relationship of the village to a Service Cluster (including access to services in the Norwich Urban Area).
5.Other Villages		<p>Defining criteria</p> <p>Has a basic range of services. This is generally a primary school and village hall, although regard will be had to a range of other services.</p> <p>Growth considerations</p> <p>Suitable for infill development within a defined development boundary and, where there is an accessible primary school, small scale housing allocations. Larger allocations may be considered where the village forms part of a Service Cluster.</p>
6.Smaller Rural Communities and the Countryside		<p>Defining criteria</p> <p>Those areas, including villages, not in one of other categories of the hierarchy.</p> <p>Growth considerations</p> <p>Typically unsustainable for growth. Therefore, suitable only for farm diversification, home working, small-scale and medium-scale commercial enterprises where a rural location can be justified, including limited leisure and tourism facilities.</p>

² Within 2 miles with safe walking facilities

Appendix B

Figure 6 Proposed settlement hierarchy – Option SH2

Tiers 1 to 3 would be the same as Option SH1, except that “Key Service Centres” would be re-named “Service Centres”.

Tier 4 Village Clusters

All remaining parishes would be placed into Village Clusters based on the premise that neighbouring villages share services. The implication of Village Clusters is that villages or hamlets with few or no services would be considered suitable for growth if services could readily be accessed in neighbouring settlements. We are consulting both on whether this is a suitable approach and how it could work in practice.

Appendix C

Option AH7: Allow “small sites windfalls” to be permitted adjacent to development boundaries (i.e. sites of 10 or fewer [to also include sub-divisions of garden plots](#)), subject to them meeting certain criteria (such as acceptable landscape impact, highways impact, access to services etc.) in all settlements with a development boundary. This *could* be an appropriate policy, making smaller sites more easily available for development, increasing flexibility and it would become difficult to resist if the NPPF is changed to encourage this. However, properly-planned growth in the GNLP will allocate an appropriate number of dwellings to defined settlements to meet the overall housing need. A policy allowing extra “windfall” sites could therefore potentially lead to more of such sites coming forward, with developers attracted by the fact that these sites might be below the affordable housing threshold. It could also make providing infrastructure more difficult and expensive to plan for and deliver (for example, water supply and treatment and providing school places). This option could therefore affect the plan-led approach in Greater Norwich.

This is considered **a reasonable alternative**, albeit one with some drawbacks.

Option AH8: Don’t allow any small-scale windfall sites for market housing, only for genuine “exception” sites (including an element of cross-subsidy, if necessary). On the basis that appropriate allocations will be made to enable villages to “thrive”, as discussed in the HWP, such a policy could may also affect the plan-led approach. This option will be easier to justify if a more dispersed pattern of growth is chosen.

This option is regarded at the current time as **a reasonable alternative**.

Appendix D

6.38 Strategic transport connections are important to the local economy and growth. The recognition of and support for such improvements in the GNLP can be of considerable assistance when funding bids are being proposed, as well as being potentially necessary to support the scale of growth proposed. The GNLP will therefore include a policy on supporting strategic improvements. The wording of the strategic element of the current JCS policy will need updating to reflect recent progress on the NDR and recent Government funding commitments for improvements to the A47 and rail improvements planned as a result of the recent franchise announcements and to Norwich to London rail services.

6.39 The Roads Investment Strategy has identified improvements on the A47 trunk road at Blofield to North Burlingham, Thickthorn and Easton to East Tuddenham with these starting in ~~2020~~ 2021/22, 2020/21 and 2021/22 respectively. A new nine year East Anglian rail franchise commenced in October 2016. This will deliver significant improvements to rail services including more services and faster journeys across the network, with two trains providing 90 minute journey times between Norwich and London each way per day, and Norwich to Cambridge services extended to Stansted Airport every hour. In addition, the policy will need to recognise that the county council has identified **the Norwich Western Link** as one of its infrastructure priorities. As it develops, the GNLP will reflect progress towards delivery of the scheme.

Appendix E

Change from

- 25. Do you favour the Village Cluster approach in option SH2?**
- 26. What criteria should be used to define clusters?**
- 27. Which specific villages could form clusters?**
- 28. How could growth be allocated between villages within a cluster?**

To:

- 25. Do you favour the Village Cluster approach in option SH2? And:**
 - a) What criteria should be used to define clusters?**
 - b) Which specific villages could form clusters?**
 - c) How could growth be allocated between villages within a cluster?**

Appendix F

4.66 The following table illustrates the scale of new growth and the new level of commitment that would result from each of the six options (in brackets). [Figure 3 sets out: the existing commitment; the proposed additional growth; and total growth figure to 2036.](#) More detail on the options, including conceptual maps, is in appendix 1.

Application of affordable housing percentage requirements on sites

- 6.76 The 2017 SHMA conclusion¹ is that a total of 11,030 affordable houses need to be provided over the period 2015-2036. With the figures rolled forward to the end of March 2017, this total has fallen to 10,333 (697 were delivered in 2015/16 and 2016/17). This is 26.5% of the total planned housing need for Greater Norwich (see section 4 above). However, it is inevitable that not all sites will be able to deliver a policy-compliant level of affordable housing. Circumstances can change, and the GNLP, as with all local plans, will need to recognise this through a viability exemption.
- 6.77 The SHMA evidence is that the amount of affordable housing need varies significantly across the three districts, from 19.9% in South Norfolk, and 24.4% in Broadland to 38.3% in Norwich (these figures will be slightly different with the delivery in 2015/16 and 2016/17 taken into account). However, as the GNLP is a joint plan, with a proportion of Norwich's "overspill" housing being accommodated in Broadland and South Norfolk, applying these differential rates is not a reasonable policy approach to take.
- 6.78 Recognising that a reasonable policy approach in the GNLP is to plan for a higher amount of housing than the OAN (to reflect the ambitions of the City Deal), as explained in section 4 above, there are several alternative policy approaches.
- 6.79 Similar to current Greater Norwich policy², it is proposed that a viability test be allowed for. This would allow for the proportion of affordable housing to be provided to be reduced or the balance of tenures³ to be adjusted where infrastructure or affordable housing costs would render a site unviable in current market conditions. It is also proposed that any applicant making a viability case to reduce the affordable housing requirements would need to do so using an open-book process. This means that the viability report could not, as a rule, be kept confidential.

Options

- 6.80 Seeking less than 27% affordable housing on all sites above the qualifying threshold is considered to be **unreasonable**. While this could increase the viability of most sites, it would risk under-delivery of the overall affordable housing target. It would also mean that a higher overall housing figure might be needed to get close to delivering 11,030 affordable houses, which could cause difficulties if excessive amounts of market housing would be needed to help deliver the required amount of affordable housing. Under-delivering affordable housing would also have negative social impacts in terms of alleviating over-crowded accommodation and "hidden families".

¹ See Figure 65

² In JCS Policy 4

³ affordable and/or social rented v low cost home ownership housing

Option AH3 - Seek 27% affordable housing on all sites above the qualifying threshold

This is the most straightforward application of the requirement for affordable housing in Greater Norwich, providing clarity and consistency between sites.

Any possible impact on viability could be mitigated by allowing the amount/tenure balance of sites to be adjusted in appropriate circumstances, where evidence shows that the site would not be viable for the full amount of affordable housing.

Experience would dictate that not all sites will be able to meet a 27% requirement on viability grounds. Therefore, setting a requirement at 27% could risk under-delivery of affordable housing. This could be mitigated by ensuring that there is an appropriate delivery buffer incorporated in the scale of housing allocation to ensure sufficient sites are available to deliver the overall affordable housing requirement.

Therefore this approach is considered to be **a reasonable alternative**.

Option AH4 – Seek more than 27% affordable housing on all sites above the qualifying threshold

The SHMA identifies an overall affordable housing requirement of 27%. Experience would dictate that not all allocated sites will be able to meet a 27% requirement on viability grounds. Therefore, requiring a higher affordable housing requirement would help to mitigate potential under-delivery on some sites.

This approach could, however, make sites less attractive to develop, as they would not be as profitable, thereby reducing the incentive for a developer to build; this would consequently negatively impact on delivery. It would run a significant risk of developers challenging a higher figure as being excessive.

Nonetheless this approach is considered to be **a reasonable alternative**, subject to clear demonstration that the higher requirement was viable.

Option AH5: Specify the affordable housing amount with the potential for phasing on certain larger sites (perhaps 100+), with a more general policy for smaller sites

This approach would allow consideration of the viability and the specifics of certain sites (which may have significant infrastructure requirements impacting on viability), and might allow specific sites to be identified for Build-to-Rent and/or other tenures, as appropriate. This could also allow larger sites – particularly new settlements – to be treated flexibly, with lower amounts of affordable housing to be acceptable in early phases of development.

Clearly, potentially allowing a lower amount of affordable housing would risk an overall under-delivering of affordable housing, but this risk might be limited by requiring clawback provisions to be part of planning permissions for all such sites.

Subject to more detailed information and consideration, this is considered **a reasonable alternative**.

Report to Greater Norwich Development Partnership

High level report on the Regulation 18 Consultation on the Greater Norwich Local Plan

Recommendation:

The Board recommends that the constituent authorities note the content of this report which will contribute to the production of the Greater Norwich Local Plan “Statement of Consultation” and producing a draft plan in due course.

Summary

This report provides high level feedback on the Regulation 18 consultation on the Greater Norwich Local Plan (GNLP) which took place in early 2018. It reports on the consultation process and key issues raised through it. More detailed feedback will be reported in September/October 2018 when the draft Statement of Consultation is produced. The consultation provides valuable information from technical stakeholders and the public which will assist in further evidence gathering and developing policies for the draft plan.

The following provides summary information on the consultation process:

- Nearly 1,400 people attended 29 roadshow events across the Greater Norwich area;
- Over 8,000 representations, evenly matched between sites and strategy, were received on the consultation documents;
- 180 new sites were submitted, and 22 revisions to existing sites were proposed.

Key findings, which will assist in developing evidence and considering policy approaches, were:

- There was greater support for the concentration of development around Norwich and in transport corridors than there was for more dispersed growth;
- Mixed views were expressed on the potential for a new settlement;
- There was more support than opposition to a new Green Belt, with a wedge based approach being favoured. However, a significant minority stated that the ‘exceptional circumstances’ required by Government for a Green Belt do not exist;
- Further consideration will need to be given to housing numbers. Contrasting views were expressed that higher numbers are required to meet needs or that the number should be lower as existing allocations should be developed first and any new sites should be held in reserve.
- Similarly, there were mixed view on jobs growth, with a small majority favouring ‘enhanced growth’;
- The approach taken to the settlement hierarchy will also need to be considered further. There was broad support for retaining the current approach to the

settlement hierarchy tiers, with the concept of 'Village Groups' having limited support;

- The vast majority argued that additional infrastructure would be required as a result of growth, with some stating that this was a reason to limit growth. Many responses focussed on health, transport, schools and water and the need for a comprehensive infrastructure evidence base was identified.

1. Introduction

- 1.1 The Regulation 18 consultation on the Greater Norwich Local Plan ran from Monday 8 January to Thursday 22 March 2018. It was originally intended to finish the consultation on 15th March. The additional week was added in response to requests to do so to allow more time for people to respond after the final roadshow events finished.
- 1.2 The consultation was made up of a number of documents:
 - The Growth Options document;
 - The Site Proposals document;
 - The Interim Sustainability Appraisal and;
 - The Evidence Base, including the Caravans and Houseboats Study; the Employment, Town Centre & Retail Study; the Interim Habitats Regulation Assessment; a New Settlements Topic Paper; the Strategic Flood Risk Assessment; the Strategic Housing Market Assessment (SHMA); part 1 of the Viability Study and the Housing and Economic Land Availability Assessment (HELAA) for submitted sites.
- 1.3 All the above documents were available to view and comment on online at www.gnlp.org.uk. Paper/email responses were also accepted to ensure that everyone had an equal chance to have their say. We received 676 paper and email responses to the Site Proposals document, many of which contained multiple site representations. We also received 1,800 individual responses to the questions in the Growth Options document by email or letter, many of which formed part of lengthy submissions sent in by agents. These responses are being manually entered onto systems by staff and will be available on the web site as soon as this process is completed. It is felt that the resource intensive nature of this work justifies the position taken to try to encourage people to reply online where possible.
- 1.4 Sections 2 to 4 of this report cover the consultation process, looking particularly at advertising/promotion, use of the website, consultation roadshows and the number of consultation responses received. Sections 5 and 6 report key issues raised though the consultation. Section 7 covers the next steps for plan production. The other paper on this agenda sets out long term timetable options for the GNLP.

- 1.5 This report will be followed by a Greater Norwich Development Partnership (GNDP) report in September/October 2018 which will give a more detailed analysis of the issues in a draft Statement of Consultation.
- 1.6 The consultation provides valuable information from technical stakeholders and the public which will assist in further evidence gathering and producing the draft GNLP in due course.

2. Advertising/branding and promotion/media

Timings

- 2.1 The promotion of the consultation started on Friday 5 January, in advance of the start date on Monday 8 and continued through to the end of the consultation. The consultation was consistently promoted, with peaks in January and early and late March to ensure maximum coverage of the key points.
- 2.2 Preparation for the consultation included creating a dedicated website, the design and production of materials and the booking of events, advertising and media space.

Branding and Promotion

- 2.3 The consultation had its own identity and branding to ensure consistency across all promotional materials to make the consultation more recognisable and memorable.
- 2.4 A new GNLP logo with illustrations was designed by officers to clearly present the plan objectives and to encourage people to have their say. In addition the four local authority logos (Broadland District Council, Norwich City Council, South Norfolk Council and Norfolk County Council) were used on proactive publicity material such as press releases/websites, signage, in-house publications, leaflets and posters. See Appendix 1 for examples of advertising and promotion.
- 2.5 A3 and A4 posters and summary leaflets were distributed at libraries, mobile libraries and other locations including college student unions, doctors' surgeries, parish/town council offices and information points. Large format outdoor posters were used near all event locations and were also situated at key sites in areas with high footfall and in locations visible from roads (see photos below). Information was also displayed on digital displays at some bus stops.



Above—Drayton



Above— North Walsham Road



Below— Sprowston Road



Below— Costessey

Media Activity

- 2.6 Proactive press releases, with quotes, were issued before the consultation started to generate public and stakeholder interest. Updates were issued during the consultation and at the end.
- 2.7 Cllr. Vincent as chair of the GNPD was the nominated spokesperson for all media and the communication teams from the councils adhered to this approach which allowed the media to go to one source for any comment.
- 2.8 A Question and Answers document was prepared to provide outline responses for potential questions likely to be asked through the consultation, particularly for use in any media interviews.
- 2.9 Regular press briefings, especially during key phases, were set up with the Eastern Daily Press (EDP), other local press, radio and television.
- 2.10 The GNGB Twitter and Facebook accounts updated all events and progress regularly and were published on each authority's own accounts. Facebook advertising was also placed.

3. Usability of the website/Website analytics

- 3.1 The consultation website address was www.gnlp.org.uk , which directed visitors to a storyboard site outlining simply what the consultation was about and how to take

part. Visitors then moved directly out of the microsite to the main consultation website which had a similar look and feel to actually respond to the consultation.

- 3.2 Links to the website and details about the consultation were displayed on all the councils' websites.
- 3.3 Some concern was expressed over the usability of the consultation website, particularly from Dickleburgh Parish Council who felt that the online questions were unwieldy, difficult to follow and time consuming to use. Concern was also expressed about the usability of the maps provided. These issues will be looked at in detail ahead of future consultations.
- 3.4 However, overall, the figures for online responses show that large numbers of people have been able to use the website. 58% of responses to the Growth Options document and 82% of responses to the Site Proposals document were made online, which in combination is well above the 60% average experienced by our web site providers. Officers worked hard to help people who experienced difficulties in making their representations online by talking them through the process on the phone and by accepting responses by email or letter. Overall, this justifies the approach taken to encourage people to reply online to the consultation and demonstrates it is sound.

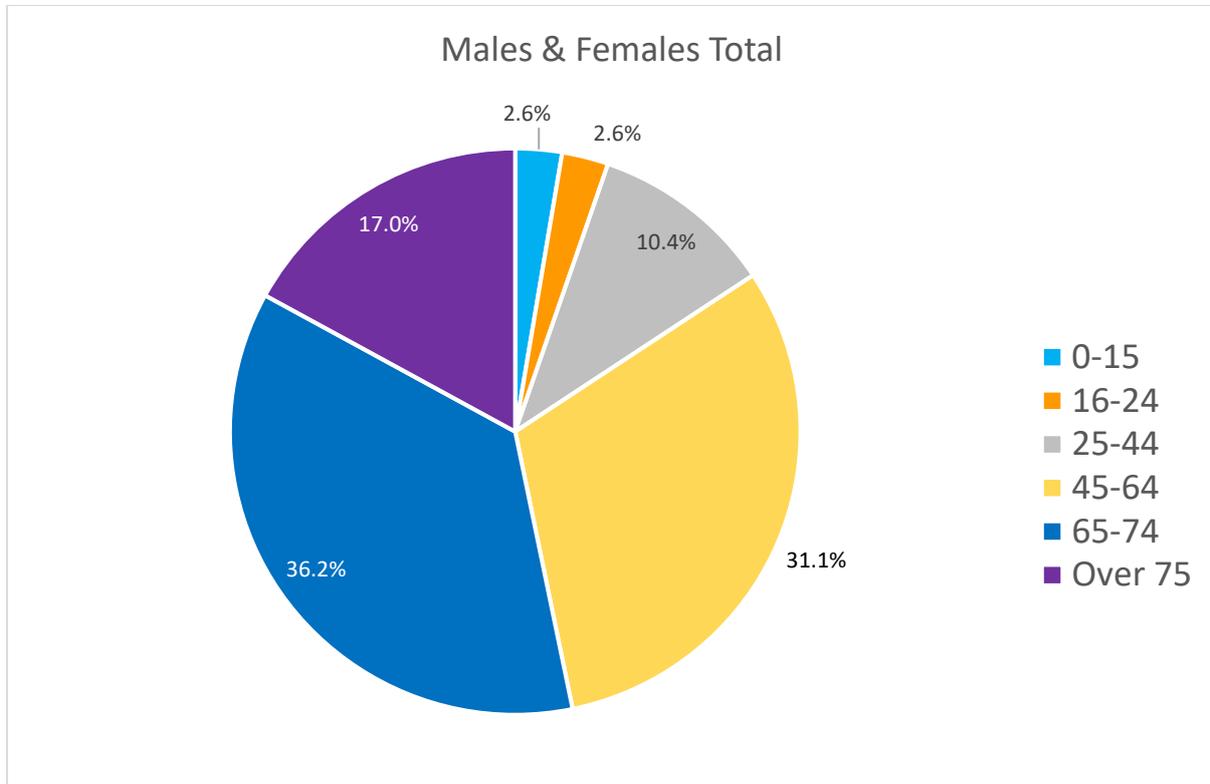
4. Consultation roadshows

- 4.1 29 roadshows were held in venues across Greater Norwich during the consultation period. These were staffed by officers from the GNLP team and a number were also attended by councillors. Specialist staff attended locations in and close to the city to support a parallel consultation on Transport for Norwich. The roadshows took the form of exhibitions and were held in selected parish halls and the Forum in Norwich city centre. The purpose of the roadshow events was to give people information about the consultation, allow them to look at maps and other consultation documents and to ask officers questions. People were encouraged to respond to the consultation, using the website where possible.
- 4.2 The exhibitions featured display boards, pop ups and posters. The exhibitions used the GNLP branding and there were A5 flyers and business cards for people to take away giving the website address. The consultation roadshows were clearly advertised locally via posters, media articles and press advertisements and reminder emails were sent to town and parish councils in the lead up to events in their area.
- 4.3 In total nearly 1,400 people attended the 29 roadshows, with an average attendance of 47 as detailed below. These figures are almost certainly underestimates as it was difficult to ensure that all visitors were recorded at busier venues. The event at Hellesdon had to be rescheduled due to heavy snow.

Consultation Roadshow events and attendance		
Date and time	Venue	Approx. attendance
22 January 2018: 2-8pm	Brundall Memorial Hall	48
23 January 2018: 10am – 4pm	Norwich, The Forum	78
25 January 2018: 2pm - 8pm	Aylsham Town Hall	16
26 January 2018: 2pm – 8pm	Acle Community Centre	54
29 January 2018: 10am – 1pm and 2pm – 5pm	Harleston Library	21
30 January 2018: 2pm – 8pm	Diss Corn Hall	56
1 February 2018: 2pm – 8pm	Cringleford, The Willow Centre	24
2 February 2018: 2pm – 8pm	Costessey, Longwater Lane	18
5 February 2018: 10am – 4pm	Norwich, The Forum	67
6 February 2018: 2pm – 8pm	Bob Carter Centre, Drayton	82
8 February 2018: 2pm – 8pm	Horsford Village Hall	14
9 February 2018: 12pm – 6pm	Rackheath Village Hall	25
12 February 2018: 2pm – 8pm	Hingham, Lincoln Hall	59
14 February 2018: 2pm – 8pm	Hethersett Village Hall	69
16 February 2018: 2pm – 8pm	Easton Village Hall	39
17 February 2018: 10am – 4pm	Norwich Millennium Library	92
19 February 2018: 11.30am – 5.30pm	Sprowston, Diamond Centre	42
22 February 2018: 10.30am – 4.30pm	Long Stratton, South Norfolk House	40
23 February 2018: 1pm – 7pm	Spixworth Village Hall	16
26 February 2018: 2pm – 8pm	Poringland Community Centre	123
26 February 2018: 2pm – 8pm	Hellesdon Community Centre	Rescheduled due to snow
2 March 2018: 2pm – 8pm	Dussindale Centre	7
5 March 2018: 11am – 5pm	Reepham Town Hall	45
6 March 2018: 2pm – 8pm	Loddon and Chedgrave Jubilee Hall	22
7 March 2018: 10am – 4pm	Norwich, The Forum	67
9 March 2018: 2pm – 8pm	Wroxham Library	38
12 March 2018: 2pm – 8pm	Taverham Village Hall	159
14 March 2018: 2pm – 8pm	Wymondham, The Hub	50
15 March 2018: 2pm – 8pm	Hellesdon, Diamond Jubilee Lodge	21
	TOTAL	1392

4.4 People attending the roadshow events were asked to record their gender, age, ethnicity and distance travelled on pin boards. The pin boards showed a 50:50 split between males and females attending with the majority of people from the 45-64 and 65-74 age groups as shown in the pie chart below. Attendance from younger age groups was limited, particularly those under 25 (although analytical data suggests that

this age group engaged more widely online). To try and address this further ways of engaging with younger people are currently being investigated. With regard to ethnicity and distance travelled, the vast majority of people attending the roadshows were white and most people had travelled under a mile to the event.



4.6 The main issues raised at the roadshows were recorded in a feedback log and are set out below. Whilst the list of issues below, along with sections 5 and 6 of this report, provide a useful summary of key discussion points ahead of detailed analysis of written representations, they are not intended as a definitive record of the consultation responses. The draft Statement of Consultation planned to be published in September/October this year will be based on the written representations, providing a detailed record. The key issues raised across the area were:

- Health care provision (most often lack of capacity and waiting times at GPs);
- Schools capacity;
- Highways capacity;
- Other infrastructure capacity (including water);
- The potential for jobs growth;
- While there was a general acceptance that more housing is needed, noticeably more so than in previous consultations, the most suitable locations and the need for a mix of housing to be provided were regularly raised. This often focussed on the need for affordable housing and smaller homes, particularly to provide for first time buyers and older people wishing to downsize;
- The proposed Growth Options and the need for a Green Belt and/or a new settlement;

- Environmental protection and Green Infrastructure.

4.7 In addition, specific local areas of concern were raised, most particularly about the recent scale of growth exceeding that planned for through the Joint Core Strategy (JCS) in areas such as Poringland, Brundall/Blofield and Wymondham.

5. Consultation responses

Growth Options Document

5.1 The Growth Options document was made up of 66 questions covering the main content of the plan, including the vision and objectives, strategy and topic policies. There was also a general 'other issues' question at the end to allow people to comment on planning issues not covered in the main document.

5.2 The main sections of the document were:

- Vision and Objectives;
- Housing and jobs numbers;
- Infrastructure;
- Growth Options;
- New Settlements;
- Green Belt;
- The Settlement Hierarchy;
- Norwich centred policy area;
- Topic policies covering a wide variety of issues such as the economy, design, housing, climate change, environmental issues and communities.

5.3 In total 4,264 responses to individual questions in the Growth Options document were received. 2,464 responses (58%) were made online with 1,800 (42%) responses submitted via paper/email. The latter have since been manually inputted onto the system by officers.

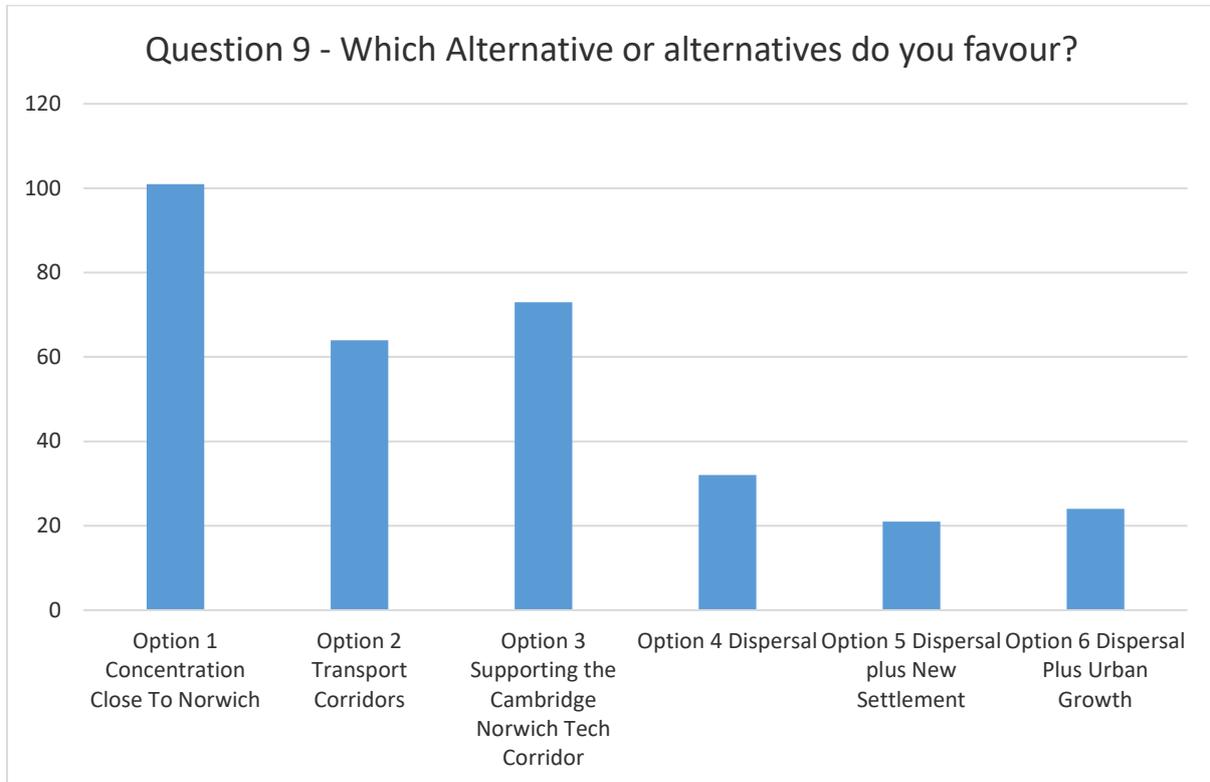
5.4 In addition a petition was received calling on the bodies drafting the GNLP to only allocate new housing developments in places where shops, schools, employment areas and other services can be reached on foot or by frequent public transport, and to oppose the dispersal of new housing across rural areas. This petition had 539 signatories.

5.5 Other than question 66, the general question at the end of the document, the questions with the highest level of responses, broadly in order, were:

Questions 9-13: Growth distribution alternatives, supporting infrastructure, new settlements and the Green Belt

5.6 Question 9 allowed respondents to favour more than one of the six proposed distribution options for growth, or none. Of the 268 people answering the question, Option 1 (concentration) was the most popular with 101 respondents. Option 2

(transport corridors) had 64 respondents and Option 3 (tech corridor including a new settlement) had support from 73 respondents. Option 4 (dispersal) had support from 32 respondents, option 5 (dispersal plus new settlement) 22 respondents and option 6 (dispersal and urban growth) 24 respondents. The graph below illustrates these figures.



- 5.7 Neighbouring local authorities expressed an interest in discussing the options with the GNLIP team. Answers from parish councils generally emphasised concerns about traffic; access to jobs and services; the availability and capacity of infrastructure; urban sprawl; and potential impact on the landscape. Several stressed the importance of growth being proportionate to the local context.
- 5.8 New Anglia LEP, Natural England, Historic England, Highways England, Anglian Water and Norwich Clinical Commissioning Group (CCG) did not single out any option as being preferable. The Campaign for the Protection of Rural England (CPRE) questioned the baseline growth assumptions and strongly favoured concentration. Norwich and Norfolk Transport Action Group (NNTAG), Norwich Cycling Campaign and Norwich Business Improvement District (BID) favoured concentration. The Green Party and others who supported options 1 & 2 supported their views with the petition to co-locate housing and services referenced in paragraph 5.4 above. Norfolk Wildlife Trust and others emphasised the potential biodiversity value of brownfield land. The Home Builders Federation questioned the suitability of the sites submitted for new settlements.
- 5.9 Parish councils generally emphasised the need for infrastructure to be in place before development, and for existing commitments to be considered both in delivery terms

and within the overall need. Dispersal options were associated with infrastructure constraints (frequent comments included roads, education, sewerage, health care, and water supply, with some concern also expressed about broadband connections, public transport, loss of agricultural land, landscapes and wildlife sites).

- 5.10 Highways England stated that Thickthorn interchange would experience the greatest impact for all options, and that the impact on the A11/B1335 junction to the north of Wymondham is likely to be significant, with option 3 predicted to be the worst for this junction and the strategic road network as a whole. Each option results in notable impacts on the majority of key junctions, but it was stated that without a known strategic direction, the eventual impact on trunk roads is unknown. Highways England supported the co-location of homes and jobs to take pressure off the strategic highway network. They also recommended that a suitable evidence base is prepared to assess the impact of the eventual preferred growth option to identify public transport and road infrastructure measures needed.
- 5.11 Norwich CCG identified health infrastructure constraints associated with 'large scale growth' and illustrated this related to a new settlement. Suffolk County Council identified traffic constraints as an issue which should be considered.
- 5.12 Related to infrastructure to support the growth options, there were several calls for the 'Western Link' between the A47 and the A1270 Broadland Northway (or NDR) to be built and the A47, A140 (s) and A1066 to be improved, as well as improved public transport, including bus services to Norwich Research Park (NRP), the University of East Anglia (UEA) and Norfolk and Norwich University Hospital (NNUH). Some respondents also requested new rail stations. CPRE and Norwich Green Party linked dispersal options with road infrastructure. CPRE suggested explicit carbon reduction targets and measures should be identified in the infrastructure section. Paragraph 5.41 and appendix 2 report responses on the general infrastructure question.
- 5.13 Alternative strategic growth options proposed included intensification of urban Norwich and 'super-dispersal' over more villages. Several respondents took the opportunity to repeat calls for co-location of homes and jobs. The CPRE suggested that 'phasing' would prevent the need for new allocations altogether. It submitted a petition signed by 64 town and parish councils (53% of all the parishes in Broadland and South Norfolk) requesting that "*.....no new sites are allocated for house building in revised local plans to 2036 until all existing allocations in current core strategies have been developed*". The Norwich Green Party emphasised the importance of access to services and called for new public transport infrastructure to be available prior to occupation of new housing sites.
- 5.14 Regarding new settlements, most parish councils which expressed a view were supportive of new settlements in principle. Some expressed the view that a new settlement would improve delivery of infrastructure and the quality of development. Among parish councils stating opposition, there was concern that a new settlement could affect the ongoing sustainability of existing towns and key service centres, or the

new settlement itself if funding for infrastructure was not forthcoming. Honingham Parish Council is not supportive of a new settlement within the parish. The CPRE and Norwich Green Party did not support a new settlement as an option. Norfolk Wildlife Trust were concerned that new settlements may result in recreational disturbance at some designated sites which may not be fully mitigated. Supporters of new settlements included some agents, Norwich CCG, subject to sufficient health capacity being available, and Natural England, subject to protection of designated sites or protected landscapes and provision of green infrastructure. Historic England supported the principle, subject to consideration of landscape and heritage assets (which is acknowledged in the Greater Norwich New Settlement Topic Paper). They encouraged an evidence-based, locally-led approach.

- 5.15 There was considerable support for the establishment of a Green Belt, including from the CPRE and the Green Party, as well as a number of individuals. A petition in support with 1,912 signatures was submitted by the CPRE. There was also some opposition, particularly from the development industry. Overall, 83 respondents were in favour of a Green Belt and 38 were against.
- 5.16 Most of those in support of favoured a wedge based Green Belt, with protection of the river valleys, the development of green infrastructure links and retaining gaps between settlements being the priority. Many supporters stated that the scale of current and additional growth provided the 'exceptional circumstances' required by Government for a new Green Belt to be established and that existing landscape protection policies are not sufficiently strong.
- 5.17 Those opposing a Green Belt argued that none of the Government's 'exceptional circumstances' for the establishment of a Green Belt could be evidenced in Greater Norwich. It was also argued that a Green Belt would lead to unsustainable patterns of growth by focussing development in locations with poor access to existing urban areas and employment and that current landscape protection policies provided adequate protection for valued landscapes. Others did not support a Green Belt as they felt it would prevent a 'Western Link' being built, though the reasoning behind this view was not made clear.

Questions 4-6: Housing numbers

- 5.18 Responses to question 4 on housing numbers were relatively evenly balanced, with 69 respondents agreeing with the consultation's basic housing need figure, the Objectively Assessed Need (OAN) for 2017-2036 of 39,000 homes, and 83 disagreeing.
- 5.19 Those supporting the figure argued that increased housebuilding is a Government priority, the population is growing, homes are unaffordable for many and significantly more homes are needed to meet social responsibilities and to support economic growth. Considerable support for using the Government's standard methodology for calculating the housing numbers was expressed. In particular, the Home Builders Federation support its use, together with the use of a 10% buffer and not including windfall in the calculation of requirement.

- 5.20 However, much of the support is tempered by additional comments e.g. housing allocations should be located in deliverable locations and the current strategy overly relies on large sites near the urban area and this should not be repeated. Highways England made the point that housing growth is likely to have a significant impact on the Strategic Road Network.
- 5.21 'No' responses included a majority who think that the figure is too high. A common theme was that the estimate was wrong or not credible, many reflecting the CPRE's comments that the methodology was flawed, and existing allocations are sufficient for the next 24 years based on past delivery rates, so any additional allocations should be phased or kept in reserve and only brought forward if needed. Others disagreed with the methodology used, suggesting that it should not have an extra affordability element. It was also argued that CIL increases house prices, thus reducing affordability, which then creates the need for more houses to be built. Others suggested that better use should be made of the existing housing stock and empty homes should be brought back into use.
- 5.22 Other general comments were that house building would attract people from outside the area, population growth should be tackled and that the wrong type of homes could be built, with the primary need for more homes being for the young, the elderly and social housing rather than larger houses. It was also argued that new homes need to be in existing centres to protect the countryside and agriculture. A view that communities will become unbalanced was expressed, along with arguments that additional homes will be bought by investors and developer land-banking and excessive developers' profits will result. Other arguments against new housing were that infrastructure will not be able to cope, there will not be enough jobs and Brexit will reduce the need for additional housing.
- 5.23 The alternative element of the 'No' responses was from those who argued that the need figure was too low. Many of these responses were from agents. Technical suggestions were that evidence from the SHMA rather than the Government's draft Standard Methodology should be used for now, and the OAN figure should not be rebased to 2017. It was also argued that the City Deal figures should be added in, giving a higher need. There was a reminder that the OAN is a minimum and it was suggested that the figure should be higher in order for the plan to achieve a 5 Year Housing Land Supply (5YHLS), with a specific point that there should be a mix of site sizes. Many of the comments appeared to relate to the promotion of particular sites, and a couple of locations were specifically mentioned as being appropriate to help delivery (e.g. Wymondham and Wroxham).
- 5.24 Question 5 asked "Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?", with 48 responding 'Yes', and 99 'No'.
- 5.25 Those responding 'Yes' generally reflected a pragmatic approach that some developments, most particularly larger ones, might not happen or may be delayed, so

there needed to be an allowance for this through a delivery buffer. Other points raised included that the OAN was an underestimate, demand for housing will increase so a buffer will be needed, and that more homes are needed for young people. A number of comments were qualified, stating there should be a review of existing allocations and any buffer should be part of a phased approach which should only be used if necessary. NHS England suggested that there would be a need for improved liaison and any changes to trajectories communicated to the health sector to ensure that health provision could be planned for.

- 5.26 A large number of the 'No' comments were aimed at keeping the housing requirement down. A number of arguments were provided for this, including: land should be protected; a buffer is not needed; the original target figure is too high, the economy will decline because of Brexit and the OAN is inaccurate and the market will not meet this figure. Similar to some 'Yes' responses seeking to only use a buffer when necessary, there was a strong feeling that any buffer should be phased and only be brought forward if absolutely needed. Advantages expressed for this approach were that it would avoid 'cherry-picking' of sites by developers and encourage brownfield sites and existing sites to be developed first.
- 5.27 A number of agents argued that the buffer should be higher, with the Chelmsford Local Plan being given as an example of a 20% buffer being used. Arguments cited were that there is "persistent" under-delivery in the area; the need to accord with national policy; large sites take a long time to deliver; a City Deal element should be included and the interim Sustainability Appraisal refers to a buffer of at least 20%.
- 5.28 Also a couple of comments reflected those of NHS England i.e. that a high buffer increases uncertainty for infrastructure providers. In particular, Highways England were concerned that a 10% buffer plus windfall (24% overall) would give a high level of uncertainty and make infrastructure planning difficult, with a potential impact on the Strategic Road Network.
- 5.29 Question 6 asked whether windfall development should be considered as additional to the figure of 7,200 new homes suggested in the document. Significantly more respondents (109) said 'No' than those who said 'Yes' (44).
- 5.30 The majority of 'Yes' comments were from agents, arguing that windfall should not be within the housing requirement and should be additional to any buffer. It was argued that this was because windfalls do not provide enough certainty on delivery and timing to be included in the housing figure and so no significant amount of windfall should be relied on. It was also maintained that there is a lack of evidence to support a specific windfall figure and that windfall is likely to reduce in the future, as in the past much windfall has resulted from 5YLS appeals. Also, it was argued that windfall generally occurs on smaller sites that do not provide affordable housing or other infrastructure benefits.
- 5.31 Alternative 'Yes' comments included arguments that windfall could provide an appropriate buffer, that it is useful in providing small-scale development in villages to

address needs for young families and the elderly, and that windfall should be encouraged through positive policies. Conversely, it was also suggested that a high windfall figure could impact on services and infrastructure, and that planning for infrastructure was harder to do for windfall than for allocated sites.

- 5.32 The 'No' comments broadly split between many who thought that it was illogical not to include windfall in the housing calculation as it contributes to needs; to those who thought the windfall should be the buffer and to those (generally agents) who thought it should be excluded entirely because of its uncertainty.
- 5.33 Other more detailed comments included: smaller developments (e.g. up to 30 units and self-build and low cost homes) should be encouraged in villages instead of large developments; past housing delivery targets were too high and this is being continued; current commitment is sufficient based on past delivery rates; inaccurate figures have been used; Neighbourhood Plans should be used for allocations and growth is not necessarily good.
- 5.34 Some further comments related to the potential dis-benefits of significant windfall: it could result in over-supply and impact on the housing market or lead to unsustainably located development. NHS England stated that windfall sites can have a significant cumulative impact on health and social care needs, and so such proposals should be communicated to health and care providers in a timely manner.

Question 1: Vision and Objectives

5.35 Views on the Vision and Objectives were varied, including:

- A number of bodies and groups sought an increased emphasis on sustainability and environmental protection, including Historic England requesting a focus on 'heritage at risk' and Natural England on protection and enhancement of the environment. There were also requests for an emphasis on stronger protection for river valleys;
- A number of comments, mainly from developers' agents, requested a greater emphasis on housing and jobs growth, whilst others felt that there should be less focus on growth given the amount of development already taking place;
- Some comments focussed on local democracy and Government planning policy;
- Some respondents considered that certain policy aspirations or place-specific issues should be reflected. Specific points were raised concerning the importance of Neighbourhood Plans not being overridden, the need for the plan to support social diversity and the importance of protecting community facilities.

Question 2: Strategic approach to delivering jobs, homes and infrastructure

5.36 94 respondents were in favour of the broad strategic approach proposed for new jobs, homes and infrastructure. The approach includes 45,000 additional jobs by 2036, along with 42,865 new homes (of which 7,200 would be on new sites) to be focussed in and around the main urban area and in towns and villages with a range of services. 52 respondents did not agree with the proposed approach. Development industry

respondents were generally supportive of the strategic approach; or, sought more development to meet the City Deals growth target, or to support development in rural communities. Residents and community organisations tended to be more negative about the strategic approach, pointing to the challenges and possible adverse consequences of growth for infrastructure, services, community cohesion and the environment.

Questions 23-25: Settlement hierarchy and the influence of the Norwich urban area

- 5.37 There was a general consensus that the top three tiers of the settlement hierarchy, the Norwich Urban Area, Main Towns and Services Centres, should be retained as they are in the Joint Core Strategy (JCS), with 71 in favour and 10 against.
- 5.38 There was also broad support for retaining the current approach to the lower settlement hierarchy tiers (Service Villages; Other Villages, and Smaller Rural Communities), with 64 in favour and 17 against, while 52 respondents were against a 'Village Group' approach and 22 were in favour. Opposition from many to the 'Village Group' approach focussed on the view that inclusion in a group might lead to individual villages having more housing or that it would lead to the merger of villages, and the loss of countryside, character, identity and distinctiveness. It was also argued that placing all settlements in 'Village Groups' would open up the entirety of rural Greater Norwich for significant development, increasing car dependency and undermining the purpose of a settlement hierarchy. Those supporting 'Village Groups' argued that villages already share services, with some stating that this approach is favoured in draft National Planning Policy framework (NPPF) paragraph 80, which says *"Where there are groups of smaller settlements, development in one village may support services in a village nearby."* It was also argued that there is merit in linking settlements at different scales of the hierarchy which share services, with Diss used as an example of a town which shares services with neighbouring villages, including some in Suffolk. Mid Suffolk was quoted as a district developing such an approach.
- 5.39 Some of the responses on the settlement hierarchy were based on arguing for or against housing allocations in a particular place, rather than on strategic principles for the distribution of housing.
- 5.40 In relation to specific locations, some responses argued that their settlement is unsustainable and should not be allocated for development (including Barford, Bergh Apton, Bramerton, Burston and Shimpling, Dickleburgh and Rushall, Hainford, Hempnall, Marlingford and Colton, Keswick and Intwood, Talconeston and Fornsett End, and Salhouse). In a few instances respondents argued that specific locations are sustainable based on their proximity to other settlements (East Carleton, Ketteringham and Scole).
- 5.41 In response to question 26 on the Norwich centred policy area, 65 respondents said they favoured having such an area, and 13 said they did not. Arguments in favour tended to be about the City being a driver for economic growth, preventing development sprawl, promoting sustainable transport and protecting rural areas.

Suggestions for drawing the boundary ranged from keeping the Norwich Policy Area (NPA) boundary as it is, drawing the boundary more tightly, as well as expanding to the core housing market area as defined in the SHMA. A notable feature is how respondents discuss the Norwich centred policy area in relation to achieving a five-year land supply. It is evident too that some respondents have a settlement or site in mind when commenting, wanting to 'push' development elsewhere or to promote sites. An alternative approach proposed keeping a Norwich centred policy for spatial distribution purposes but not for calculating the five-year housing land supply. Those opposed to having a Norwich centred policy area argued that it was unnecessary as site allocations made in the new plan and a settlement hierarchy based on the Norwich Urban Area and the Main Towns could be relied upon instead.

Question 7 Infrastructure requirements needed to support growth

5.42 The vast majority of respondents (137) felt that there are infrastructure requirements to support the overall scale of growth, with just 4 respondents stating that there are none. In line with discussions at consultation events, many responses focussed on health, transport, schools and water. In addition, a number of responses stated that infrastructure needs would be dependent on the option chosen for growth. In line with the approach currently being taken, the need for an infrastructure study to set out needs and inform policy once the chosen option is clarified was identified. Appendix 2 contains more detail on the comments made on infrastructure needs to support the overall scale of growth.

Question 3 Jobs growth

5.43 Of the 128 recorded responses on jobs growth, around 60% supported the 'enhanced growth' option, that is, forecast growth plus additional growth in accordance with the City Deal. There was however a sizeable minority in favour of 'business as usual' forecast growth only.

5.44 Considerable support for the 'enhanced growth option' came from partners and organisations that had signed up to the City Deal. Supporters pointed to the strong and sustained economic growth across the plan period being justified by the Employment, Town Centre & Retail Study which evidences these ambitious growth targets, and it was important to set such targets in order to fulfil the area's economic potential and attract investment. There was, however, a need for flexibility and contingency in the run up to Brexit, which could potentially result in short term jobs decline. Growth needed to be targeted in a diverse range of sectors especially those supporting the green economy and high productivity tech industry around the Airport and NRP. Skills gaps need to be addressed and there was an urgent need for key worker and affordable housing. The 'business as usual' trend based forecast was claimed to be founded on flawed evidence which did not factor in the growth already committed from the City Deal. There was also some concern that the potential of the Cambridge-Norwich tech corridor had not been adequately recognised in this option, and even higher growth was possible.

- 5.45 Among those supporting the 'business as usual' option there was scepticism about the deliverability of the enhanced forecast, given a historic failure to realise the more modest JCS targets, a perceived major negative impact of enhanced growth on the environment and existing infrastructure and the lack of evidence that a high growth strategy had so far made any real impact on inward investment: national companies having pulled out of Norwich rather than firms being attracted in. The 'business as usual' forecast was viewed by some as more credible and consistent. Reliability of long-term job forecasting was questioned by many respondents given so many unknowns. Some were concerned about the nature of jobs to be provided e.g. the role of tourism and the perceived mismatch between the need for higher value jobs in the rural areas and villages. A fear was expressed that growth in the targeted sectors would tend to focus employment development disproportionately on Norwich and the higher order settlements resulting in increased commuting and preventing the rural economy from achieving its full potential.
- 5.46 A small number of respondents were dissatisfied with both options and considered the question skewed, in that both were predicated on promoting unacceptably damaging levels of growth with an unspoken assumption that 'growth was good'. There was some confusion about the relationship between the 'business as usual' forecast and the enhanced forecasts derived from the evidence base and a perceived lack of clarity in the commentary, making an informed response difficult.

Further work

- 5.47 A more detailed analysis of the Growth Options responses, including those questions such as the topic policies not covered above, will be available in the draft Statement of Consultation in the September/October GNDP report.
- 5.48 The written responses to the Growth Options document are currently being formatted by officers and will be made public on the website as soon as possible.

Site Proposals Document

- 5.49 The Site Proposals document consulted on 562 sites (366 in South Norfolk, 166 in Broadland, 25 in Norwich and 5 cross boundary sites between South Norfolk and Broadland at Honingham). A summary of the sites for each parish was presented along with a map of each site. To help people in making their comments more detailed summaries for each site were provided in the HELAA, available as part of the evidence base. The HELAA shows how submitted sites have performed in a desk-based assessment of constraints. The inclusion of a site as potentially suitable for development within the HELAA does not give the site a planning status, or mean that it will be brought forward for development. Equally, sites excluded from the HELAA can still be subject to more detailed site assessment and be considered for allocation through the local plan process.
- 5.50 As shown in the table below, in total there were 1,496 respondents who made 3,778 individual representations. Of the 3,778 individual representations, 3,102 (82%) were

submitted online, with 454 (12%) via email and 222 (6%) on paper. 81% of the representations received were objections.

Site Proposals Document Representation breakdown	
Number of Respondents	1,496
Number of Objectors	1,312
Total number of representations received	3,778
Representations submitted via the web	3,102
Representations submitted via email	454
Representations submitted on paper	222
Representations - support	413
Representations - object	3,044
Representations – comment	321

5.51 The table below shows the breakdown of representations across the three districts. It illustrates that 2,131 representations (56%) were submitted regarding sites in South Norfolk, 1,410 representations (37%) on sites in Broadland, and 218 (6%) on sites in Norwich. 19 representations (0.5%) were made on the development boundary/small sites question.

Site Proposals Document Representation breakdown by area	
Responses to Question 1 – Development Boundaries	19
Responses to sites in Broadland	1,410 (The parishes with the most representations received were Taverham, Horsford, Drayton, Hainford, Honingham and Buxton with Lammas)
Responses to sites in Norwich	218 (This figure reflects the limited number of sites submitted in Norwich. The sites around UEA received the highest number of representations)
Responses to sites in South Norfolk	2,131 (The parishes with the most representations received were Dickleburgh, Cringleford, Rockland St Mary, Colney, Bergh Apton and Roydon)

5.52 Included in these figures are petitions from Coltishall Parish Council (300 signatories concerned about over development of Coltishall) and Honingham Parish Council (on behalf of residents in Mill Lane, Honingham opposed to the proposals for a new settlement at Honingham Thorpe).

- 5.53 Summaries of all the representations are available online. It is intended that full submissions and attachments will be made public shortly following final checking. The comments received on the sites will be used to revisit the HELAA assessment and then inform a detailed site assessment process prior to production of the draft plan (see the other report on this agenda for further details of timescales).

Interim Sustainability Appraisal/Evidence Base

- 5.54 As part of the preparation of the Greater Norwich Local Plan an appraisal of the social, environmental and economic impact of the plan must be carried out. This is known as a Sustainability Appraisal (SA). An Interim SA was published for comment alongside the Regulation 18 consultation.
- 5.55 As shown in the table below, there were 12 respondents who made 12 individual representations. 7 of the representations received to the Interim SA were objections.

Interim Sustainability Appraisal Representation breakdown	
Number of Respondents	12
Number of Objectors	7
Total number of representations received	12
Representations submitted via the web	9
Representations submitted via email	3
Representations submitted on paper	0
Representations - support	3
Representations - object	7
Representations – comment	2

- 5.56 There were only 5 comments made on the evidence base through the consultation. Of the 5 comments, 3 were in relation to the Interim Habitat Regulations Assessment, 1 was on the HELAA and 1 was on the Strategic Flood Risk Assessment.

Evidence Base Representation breakdown	
Number of Respondents	5
Number of Objectors	1
Total number of representations received	5
Representations submitted via the web	0
Representations submitted via email	4
Representations submitted on paper	1
Representations - support	1
Representations - object	1
Representations – comment	3

6. New sites

- 6.1 In addition to the 562 sites which were consulted on, people were also invited to submit new sites.

6.2 180 new sites were submitted and 22 previously submitted sites have been revised. All of these sites have been logged and mapped and will be publicised online shortly. They will be subject to an initial HELAA assessment to inform a focussed public consultation in Autumn/Winter 2018 (see paragraph 5.1 of the other report on this agenda). This focussed consultation will also include smaller sites (less than 0.25 hectares or fewer than 5 homes) which have not been consulted on previously.

6.3 Key points

- Of the new and revised sites, 70 are in Broadland, 122 in South Norfolk and 10 in Norwich;
- 65 new sites are under 1 hectare, with 10 sites between 0.4 and 0.5 hectares;
- 8 new sites are between 10 and 20 hectares. These are in Horsham St Faiths/Newton St Faiths, Bawburgh, Mulbarton, Little Melton, Tivetshall St Mary, Norwich and Rackheath;
- 18 sites are over 20 hectares. These include a redrawing of the land at Honingham Thorpe, as well as sites at Rackheath, Horsford, Acle, Diss, Costessey and Wymondham. A 50 hectare site east of Harford Tesco has been put forward for employment use;
- 1 new settlement site (394 hectares) has been submitted at Silfield and the previous Spooner Row submission has been expanded so that it is effectively a new settlement scale proposal;
- Of the new sites in Norwich, 3 are significant sites in the city centre: the Archant offices/car park (for mixed use development); Chaplefield (for intensification of current uses) and Riverside (for intensification of uses, including additional housing). While no submission has been made on Carrow Works, the future of this strategic site will need to be considered through the GNLP. 2 new sites, south of the Sainsbury Centre and the Congregation Hall, are within the UEA.

Strategy development

6.4 The new sites submitted are of great value as they will provide more choice for strategy development:

- **Norwich urban area:** The emergence of new sites will enable more housing growth to be allocated on brownfield land within the existing urban area of Norwich. The key impact on the strategy will be the future of the Carrow Works site. Some additional sites have also been submitted on the edge of the urban area.
- **Main towns and service centres:** Previously very few sites had been put forward at Harleston. With new sites put forward here, we now have a choice of potential options at all the main towns and service centres.
- **Villages:** Around half the new sites are put forward in villages, providing more potential options for village allocations.

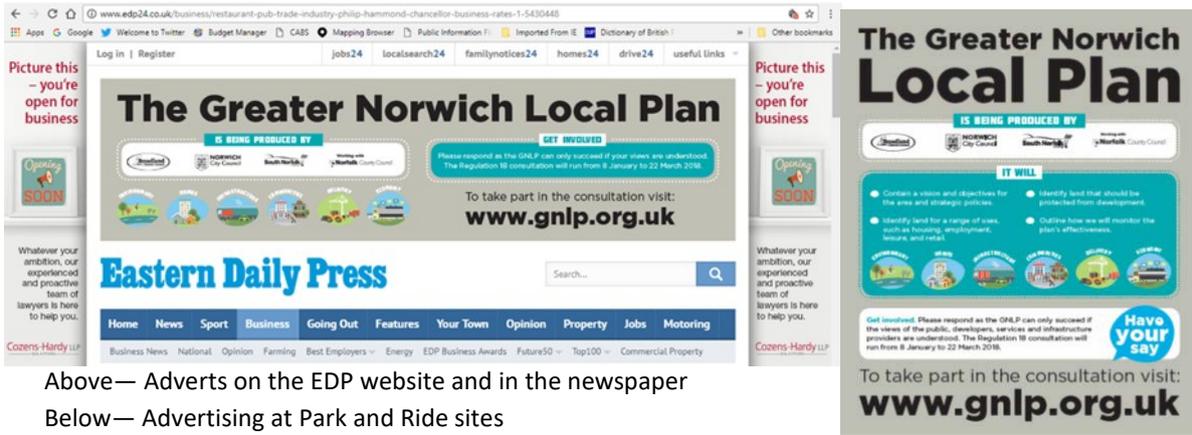
- **New settlement:** A total of 4 options for a new settlement have now been put forward for consideration: 1 at Honingham Thorpe and 3 to the east and south of Wymondham.

7. Next Steps

7.1 Appendix 3 sets out the draft timetable to enable Regulation 18 consultation to take place on the draft plan in September to October 2019. This will shortly be reviewed by the newly appointed Project Manager. As part of this timetable, over the coming months the GNLP team will:

- Publish full consultation responses for all documents on the website once final checking and formatting has been done;
- Take new/revised sites through the HELAA process, plus revisit the HELAA assessment for existing sites based on comments received through the consultation;
- Produce a more detailed Statement of Consultation for publication in September/October 2018, including detailed analysis of responses to the Growth Options document;
- Hold a focussed consultation on new, revised and small sites in Autumn/Winter 2018.

Appendix 1 Examples of Advertising and Promotion



Above— Adverts on the EDP website and in the newspaper
 Below— Advertising at Park and Ride sites



Above— Widely distributed posters/flyers
 Below— Extension to consultation widely announced



Below— Greater Norwich Twitter feedback from events



Below— Early advertising on Greater Norwich Twitter





Above—Norfolk County Council updates on Transport for Norwich and the GNL

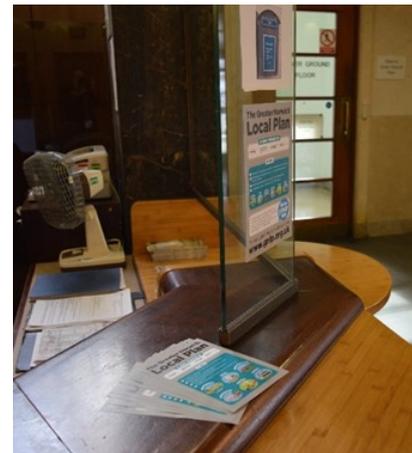
Below - Norfolk County Council Twitter and feedback



Above—South Norfolk twitter updates



Above & Below— Flyers and all consultation documents at council offices deposit points



Left— Greater Norwich Web Site and Twitter advertising roadshows



Appendix 2 Infrastructure comments

Please note, this is not intended to be the definitive record of consultation responses.

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

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

	It was argued that a dispersed approach to accommodating a proportion of may allow for more development to come forward within existing capacity limits in rural areas, or in areas where the upgrades are more affordable/easy to deliver.
	Others argued that it is easier to provide infrastructure if development is in new settlements.
	It was also stated that development should be focussed on fewer, larger areas, for which a comprehensive delivery programme on all aspects of the development can be established because the scale and quantum exists to generate viability for infrastructure.
	It was argued that local authorities must have greater funding from Government and be able to borrow money as CIL will not meet infrastructure needs.

A number of parish and town councils, other organisations and individuals identified infrastructure requirements in specific settlements which would be required to support growth:

- Hethersett - health facilities + parking;
- Wymondham - school places, general infrastructure + community facilities;
- Hellesdon - doctors + community facilities;
- Aylsham - health facilities;
- Diss - education, health and road improvements are required in the area. This would help realise greater opportunities for growth;
- Scole – schools, healthcare (including local X-Ray facilities) + highways.
- Dickleburgh - highways, health facilities, schools + sewerage;
- Poringland – drainage + improved mobile phone reception;
- Hainford - improved public transport, health services, drainage, telecommunications, schools + roads;
- Reepham – improved road access;
- Mulbarton - an agent stated that a developer is willing to provide a surgery site for nil cost but there will be a need for additional funding.

**Appendix 3 - Draft GNLP Deliverables Checklist for Reg. 18 Draft Plan
(Consultation Sep. to Oct. 2019)**

Workstream	WP No.	Description of Deliverable	Partnership Final Sign Off
Governance and Project Assurance	1	High Level Report of Reg.18 Consultation	GNDP: June 2018 then Councils
		GNLP Timetable Options Report	GNDP: June 2018 then Councils
		Draft Statement of Consultation Reg.18	GNDP then Councils: Sept./ Oct. 2018
		Review and Update Local Development Scheme	GNDP then Councils: Sept. / Oct. 2018
		Sign-off of GNLP Documents for Reg. 18 Draft Plan consultation	GNDP then Councils: July/August 2019
	2	Legal and Soundness Self-Assessment	Councils: July/August 2019
	3	Liaison with Critical Friend	n/a
	4	Liaison with Legal Advisors	n/a
	5	Duty to Cooperate Log	n/a
Communications and Engagement	1	Manage and Maintain Consultation Database	n/a
	2	Establish Programme of Technical Stakeholder Engagement	n/a
	3	Engagement with Landowners, Agents and Developers	n/a
	4	Additional Sites Focussed Consultation	GNDP then Councils Sept. 2018 (consultation Oct. to December 2018)
Reg.18 Consultation Representations	1	Log and Publish Reg.18 Representations, Notify Respondents	n/a – complete July 2018

Workstream	WP No.	Description of Deliverable	Partnership Final Sign Off
GNLP Strategic Policies	1	Jobs and Housing Targets	IDB – mid 2019
	2	City Centre Policy	
		Urban Area and Fringe Parishes Policy	
		Norwich Centred Policy	
	3	Distribution of Development	
	4	Settlement Hierarchy	
	5	Infrastructure	
GNLP Sites and Allocations	1	Update and Maintain Master Log of Promoted Development Sites	n/a
		Produce and Publish Updates Maps of Sites Promoted	IDB: July 2018
		Redact Site Submission Forms and Upload to Website	IDB: July 2018
	2	Update HEELA, inc. assessment of Reg.18 Sites	GNDP mid 2018
	3	Brownfield Register	GNDP ongoing
	4	Local Plan Site Assessment	GNDP late 2018/early 2019
GNLP Topic Policies and Monitoring Framework	1	Employment Policy	IDB – mid 2019
	2	Housing Policy	
	3	Environment Policy	
	4	Transport Policy	
	5	Communities Policy	
	6	Culture Policy	
	7	Retail Policy	
	8	Design Policy	

Workstream	WP No.	Description of Deliverable	Partnership Final Sign Off
	9	Air Quality Policy	
	10	Landscape Policy	
	11	Energy Policy	
	12	Water Policy	
	13	Broads Policy	
	14	Implementation and Monitoring	
Research and Fact Finding Studies	1	Village Services Audit	
	2	SHMA Update	
	3	Reg. 18 Sustainability Appraisal Report	GNDP then Councils July/August 2019
	4	Water Cycle Study	IDB – mid 2019
	5	Habitat Regulations Assessment update	IDB July/August 2019
	6	Visitor Surveys (if necessary)	
	7	Viability Study stage 2	
	8	Caravans and Houseboats Update	
	9	Economic Study Update (if necessary)	
	10	New Settlement Study (if necessary)	
	11	Level 2 Strategic Flood Risk Assessment (SFRA)	
	12	Transport Assessment/Modelling	
	13	Infrastructure Needs/Delivery Assessment	
	14	Small Sites Housing Delivery Trends	
	15	Energy Study	

Workstream	WP No.	Description of Deliverable	Partnership Final Sign Off
CIL Review	1	Report to GNGB on review	GNGB June 2018
	2	Potential Interim Review on CIL operation	TBC
	3	Prepare Evidence Base to Inform Draft Levy Rates, Engage with Neighbouring Authorities	GNGB and Councils – recommended that it is timed to coincide with the GNLP production process.
	4	Prepare Preliminary Charging Schedule and Publish for Consultation	
	5	Prepare Draft Charging Schedule	
	6	Publish Draft Schedule	
Monitoring	1	JCS Monitoring Report	GNDP: Jan 2019
	2	Land Supply Statement	GNDP: Jan 2019
	3	District Monitoring	GNDP: Jan 2019
	4	CIL Monitoring	GNDP: Jan 2019

Report to Greater Norwich Development Partnership

Revised timeline for the Greater Norwich Local Plan

Summary

This report presents options for the timetable for the remaining stages of the Greater Norwich Local Plan (GNLP).

Recommendation:

The Board recommends that the constituent authorities approve Option 1 in this report as the timetable for progressing the GNLP and update their Local Development Schemes accordingly.

1. Introduction

- 1.1. This report identifies the timetable for the remaining stages of the Greater Norwich Local Plan (GNLP).
- 1.2. Two key issues have been identified, firstly the forthcoming production of the revised National Planning Policy Framework (NPPF) and secondly, how best to minimise the risks of the submitted GNLP being found unsound, its examination being delayed, or it being legally challenged.
- 1.3. Dependent on the option chosen, the proposed approach to addressing these issues will involve extensions to the current timetable of 9 months (option 1) to 15 months (option 2), with adoption being in September 2021 or March 2022, rather than December 2020. However, for both options the first opportunity the public will have to comment on a draft plan, and to see which strategy and sites have been proposed by the councils, will be delayed by three months from the current timetable to September 2019.
- 1.4. Legal advice has made it clear that an extended timetable will not negatively affect the ability to implement existing local plan policies ahead of the adoption of the GNLP.

2. Background

- 2.1. The original timeline for preparation of the GNLP was for a single Regulation 18 consultation in 2017 on favoured options and reasonable alternatives for the strategy, topic policies and sites, moving to Regulation 19 pre-submission publication in summer 2018.
- 2.2. The Regulation 18 consultation had to be delayed and its content was changed from the original timetable because of:
 - the time taken to build consensus leading to programme planning and resource issues; and
 - changes in Government policy in relation to housing numbers.
- 2.3. The current published timetable for plan production is the following:

Table 1 - Current published timetable

Production milestones	Dates
Complete and publish pre-submission draft (Regulation 19) plan for consultation: to include agreed strategic policies, sites and site-specific proposals	June-July 2019
Formal submission of GNLP to Secretary Of State (Regulation 22)	October 2019
Public Hearings	June 2020
Consultation on Proposed Main Modifications	July-August 2020
Publication of Inspector’s Report	Nov. 2020
Adoption of the Greater Norwich Local Plan	Dec. 2020

- 2.4. The March 2017 Greater Norwich Development Partnership (GNDP) report, followed by reports to the constituent authorities, outlined the reasons for and potential consequences of the revised approach. The GNDP report is available [here](#), see in particular paragraph 2.4. This highlighted that there were uncertainties for progressing the plan relating to the tight timetable and changes in Government policy.
- 2.5. The amendments to its content meant that the recent Regulation 18 consultation was effectively an issues and options consultation. While it undoubtedly provides very useful feedback to develop the plan further, its content contrasts with the much more worked up plan which was originally intended to include a draft preferred strategy, topic policies and sites. **This means that a draft plan with preferred options has not been consulted on at the Regulation 18 stage.**
- 2.6. The recent consultation (see the other report on this agenda) instead presented a range of growth options and sought views on the sites that had been put forward through the call for sites. Each site was assessed through an agreed high level county wide approach (a HELAA assessment). No preferred growth strategy or sites for allocation were identified. However, favoured options and reasonable alternatives were identified for some aspects of the consultation where clear evidence or Government guidance was available. This included the vision and objectives for the plan and some strategic and topic policies covering broad issues including design, climate change and the potential for a Green Belt. As required by Regulations, the consultation allowed additional sites to be submitted.
- 2.7. 180 additional sites, 22 revised sites and over 8,000 individual responses were submitted through the consultation.
- 2.8. Regardless of any other decisions, the current published timetable needs to be amended as it requires key decisions for the Regulation 19 stage to be made shortly before the 2019 local elections to enable consultation in summer 2019. All the local planning authorities have elections at this time, and, due mainly to “purdah”, making the necessary key decisions prior to the elections would be very difficult. This will extend the timetable by at least 3 months.

3. Possible approaches

- 3.1. The three possible approaches that have been considered to progress to Regulation 19 are set out in Appendix 1. However, only one is considered credible. This is a full second Regulation 18 consultation providing a “draft plan”, with preferred options both for sites and all other aspects of the plan, including the vision and objectives, strategy and topic policies. The other two approaches,

going directly to Regulation 19 consultation or holding a limited second Regulation 18 consultation only on new sites, run too great a risk of being unsound.

4. The case for a full second Regulation 18 consultation

4.1. The case for a full second round of Regulation 18 consultation has become compelling due to:

- The recent publication of the draft National Planning Policy Framework (NPPF) and its forthcoming introduction, due in summer 2018, which will affect plan-making. An extended timetable will allow the implications of the revised NPPF to be fully consulted on and integrated into the local plan. This will demonstrate that the submitted plan is sound at examination. It is also likely to mean that **the GNLP will be one of the first plans adopted to have consulted on and incorporated the requirements of the revised NPPF.**
- The inclusion of an unaltered standard methodology for calculating housing numbers in the draft NPPF vindicates the GNLP approach to establishing housing need in the recent consultation using the standard methodology. However, the draft Planning Practice Guidance¹ specifically refers to this figure being a minimum and to “circumstances where it is justifiable to identify need above the need figure identified by the standard method”. It highlights that need figures are trend based and do not allow for uplift resulting from factors such as Housing Deals and the Housing Infrastructure Fund. It states that in locations such as Greater Norwich where this funding is in place, the housing figure “can be reflected as a range.....” and indicates that such an approach is very likely to be considered sound. **The implications of this statement need to be exposed to public consultation.**
- The original timetable being predicated on progressing to Regulation 19 after having consulted on a preferred strategy at Regulation 18. Due to the reasons set out in paragraph 2.2 above, the recent Regulation 18 consultation did not consult on a preferred policies and sites, although it did provide valuable feedback to assist in the production of the draft plan. **It is now clear that failure to consult on preferred policies and sites at the Regulation 18 stage would entail significant risks and the GNLP could be found unsound or legally challenged. This view has been fully confirmed by both our Planning Critical Friend and our legal team.**
- New and revised sites that have been submitted or may become available could have an important impact on the favoured strategy. These include the key additional brownfield Unilever/Colmans site in East Norwich, a new settlement scale site at Silfield east of Wymondham and additional sites submitted around main towns such as Diss and Harleston. **New and revised sites, along with small sites (of less than 0.25 hectares and fewer than 5 homes), need to be consulted on.**

4.2. To provide some context from past experience, in preparing current site specific proposals documents, Norwich had three Regulation 18 sites consultations and Broadland and South Norfolk each had four. More recently neighbouring authorities such as Breckland, the Broads Authority and Waveney have all consulted on preferred options ahead of Regulation 19.

5. Revised timetable options and implications

5.1. Two options for the proposed revised timetable are set out below. Both options include a focussed consultation on newly submitted and revised sites, along with small sites, in Autumn/Winter 2018. This will allow individuals and organisations to comment on these sites over a three month period. Newsletters will be produced to update people on plan progress, but it is not anticipated that formal consultation events will be held.

¹ Page 26, Deviation from the standard method, available [here](#) .

5.2. A formal Regulation 18 consultation on the draft plan, including the chosen sites, is scheduled for Autumn 2019 in both options 1 and 2. The difference between the options is that option 1 accelerates the timetable to adoption after Autumn 2019.

5.3. For both options, this means that the first opportunity the public will have to comment on a draft plan, and to see which strategy and sites have been proposed by the councils, will be delayed by three months from the current timetable.

Table 2 – Proposed revised GNL P timetable Option 1

Production milestones	
Focussed consultation on newly submitted sites	Oct. – Dec. 2018
Complete and publish draft (Regulation 18) plan for consultation: to include preferred policy options, growth strategy and site allocations	Sep. – Oct. 2019
Complete and publish pre-submission draft (Regulation 19) plan for consultation: to include agreed strategic policies, sites and site-specific proposals	Feb. - March 2020
Formal submission of GNL P to Secretary Of State (Regulation 22)	June 2020
Public Hearings	January 2021
Consultation on Proposed Main Modifications	March – April 2021
Publication of Inspector’s Report	July 2021
Adoption of the Greater Norwich Local Plan	September 2021

5.4. A fundamental requirement of the Option 1 timetable is the ability to produce a Regulation 18 document that is essentially a preferred plan capable of submission (with rejected reasonable alternatives). This will need to be turned around very quickly with very limited changes to deliver a Regulation 19 submission document to the timetable. This will be challenging for officers and Members, but minimises delay. Decision making will need to be streamlined and consensus will be required.

5.5. Option 2 for the revised timetable increases the amount of time before the Regulation 19 would be produced, allowing more time for decision making, but extending the date of adoption into 2022.

Table 3 - Proposed revised GNL P timetable Option 2

Production milestones	
Informal consultation on newly submitted sites	Oct. – Dec. 2018
Complete and publish draft (Regulation 18) plan for consultation: to include preferred policy options, growth strategy and site allocations	Sep. – Oct. 2019
Complete and publish pre-submission draft (Regulation 19) plan for consultation: to include agreed strategic policies, sites and site-specific proposals	June - July 2020
Formal submission of GNL P to Secretary Of State (Regulation 22)	October 2020
Public Hearings	June 2021
Consultation on Proposed Main Modifications	Sep. – Oct. 2021
Publication of Inspector’s Report	January 2022
Adoption of the Greater Norwich Local Plan	March 2022

5.6. If option 2 is taken forward, the plan's end date will need to be extended to at least 2037 to allow, as required by the NPPF, the plan to have a fifteen year time horizon from adoption.

5.7. There are two particular "deadlines" that also need to be considered:

- Amending the current timetable would extend the delay in meeting the South Norfolk local plan review deadline (October 2020) from 2 months to 11 months (option 1) or 17 months (option 2). Option 2 would mean that Broadland would also not meet its review deadline of the end of 2021;
- The draft amendments to the NPPF would, if implemented, mean that the Joint Core Strategy (JCS), adopted in January 2014, could be considered out of date from January 2019².

5.8. Significantly, legal advice on these issues from counsel provides clarification and comfort on the status of existing local plan documents after the above dates and prior of adoption of the GNLP. Counsel argues that failure to meet "*a somewhat arbitrary review deadline*" will not be a material consideration in determining planning applications. He also states "*What is or is not up to date turns on consistency with the NPPF*" and "*Either the local plans are up to date or they are not*". Therefore it is clear that it is not the timing of the completion of a plan review that is the issue for the status of the existing local plan policies ahead of adoption of the GNLP, but rather whether the existing local plan reflects the requirements of the NPPF.

5.9. This means, in relation to the 5 year land supply and the status of other existing policies, the adoption date of the GNLP will have little impact. For the 5 year land supply, subsequent to the "deadlines" above, the authorities will either have a 5 year land supply or they will not, irrespective of progress on the GNLP.

5.10. This increases the importance of the Greater Norwich Growth Board (GNGB) having a delivery plan, as is likely to be required by the NPPF, to assist the early release of sites as a means of encouraging development which will help to address 5 year land supply issues and thus mitigate risks to implementing the existing local plan.

5.11. In addition, both options for the proposed timetable would mean that the GNLP will have gained significant weight as the new plan will be well on the road to adoption.

5.12. The extended timetable will also have an impact on neighbourhood plan making, as the local plan provides the strategic growth numbers which specific neighbourhood plans are based on. Ahead of approval of the GNLP, there will be a need to provide indicative growth figures on request for those areas producing a neighbourhood plan. This is currently of most relevance to Diss and District and possibly the Cathedral, Magdalen Street and St. Augustines area of Norwich.

6. Emerging national policy - strategic plans

6.1. The decision to take the current approach of producing a single local plan for Greater Norwich covering both the growth strategy and all site allocations together was made over two years ago, reflecting Government guidance in the NPPF.

² The draft NPPF (paragraph 23) states that *Policies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of the plan and Reviews at least every five years are a legal requirement for all local plans.*

- 6.2. Changes in the new draft NPPF clarify the need for plans to identify “Strategic Priorities” for issues as housing, jobs and infrastructure, and including cross boundary issues. These priorities are very likely to be subject to particular scrutiny at plan Examinations.
- 6.3. A way of doing this, predicated on the draft NPPF and best practice recently promoted by the Ministry of Housing, Communities and Local Government (MHCLG)³ for combined authorities, could involve producing a strategic plan, including strategic sites, and a separate plan or plans covering more local site allocations and issues. Taking such an approach would mean a return to the production of separate local plan documents like the JCS and subsequent site allocation documents.
- 6.4. Such a growth strategy document could be concise and focussed, covering a limited number of policies as well as strategic sites. This could potentially be done over the 5 districts (including Breckland and North Norfolk) which evidence suggests constitute the functional economic and housing areas. This would also tie in more closely with emerging national policy.
- 6.5. This approach is included to raise awareness of emerging Government policy. However it lies beyond the scope of the emerging GNLP.
- 6.6. Disadvantages of taking a strategy first approach for the GNLP, which has already spend two years developing its plan, include:
- reputational risks;
 - unquantifiable delays;
 - increased uncertainties associated with working over any wider area;
 - the potential for increased costs as work done up to now, particularly from the recent consultation, would be unlikely to be fully utilised.
- 6.7. The draft NPPF states that “Plans should make explicit which policies are ‘strategic policies’” where a single local plan is produced. Therefore it will be necessary to clearly differentiate between the strategic and local aspects of the plan. So long as “strategic priorities” are covered, MHCLG are clear that **either a single local plan, or a strategy first approach followed by separate local plan documents, can be produced.**
- 6.8. It is also important to note that the draft NPPF provides strong support for the joint approach to planning that we have taken in Greater Norwich for a number of years. **The draft NPPF is in effect catching up with what we have been doing in Greater Norwich rather leading us in a new direction.**

7. Justification for this report’s recommendation

- 7.1. It is clear that there is a need for a full second Regulation 18 consultation on the emerging plan. However, the relative merits of timetable options 1 and 2 are finely balanced. **For both options, it is abundantly clear that substantial effort will need to be made to build and maintain consensus on strategic approaches.**
- 7.2. The **Option 1** timetable for a full second Regulation 18 consultation and subsequent progress to submission and examination **is recommended.** This is because it **reduces the risk of issues of soundness or procedure being raised through the examination process or legal challenges being**

³ MHCLG is quoting the LEP led [West of England plan](#) as an example of good practice.

made, whilst minimising the delays to adoption. However, the timetable is very tight, particularly between the second Regulation 18 stage and Regulation 19. Consequently, significant resource would need to be made available and it may be necessary to introduce concurrent meetings or joint decision making.

7.3. Option 2 has the same benefits as option 1 in terms of **reducing soundness and legal challenge risks.** Since legal advice strongly argues that the additionally extended timetable will have little practical impact on the application of policies in the existing local plan ahead of adoption of the GNLP, **Option 2 should be chosen if Members' main concern is that there should be more time for decision making and greater certainty overall.**

8. The Next Steps

8.1. Anticipated forthcoming work streams to progress to Regulation 19 include:

- Processing and analysis of the recent consultation responses;
- Producing feedback reports on the consultation. A high level feedback report to the GNLP accompanies this report on this agenda. Appendix 3 of the feedback report sets out the main work streams, with timings, to reach the Reg. 18 draft plan consultation recommended for September to October 2019.
- A more detailed report on the recent consultation, including the Statement of Consultation, is planned for September or October 2018;
- Review of the revised NPPF to further inform implementation of the JCS and the content of the GNLP;
- Processing, assessing (through the HELAA process) and consulting on new and revised sites and small sites;
- More detailed assessments of shortlisted sites;
- Further development of the evidence base, including the Viability Study, Infrastructure Needs, Traffic Modelling and a Water Cycle Study;
- Work on the Sustainability Appraisal;
- Further development of the vision and objectives, strategic growth options and topic policies;
- Further work to assess the legal soundness of the plan;
- Building political consensus;
- Producing the draft consultation plan.

8.2. Changes to the GNLP timetable will also require revisions to the Local Development Schemes for each district.

Appendix 1 - Approaches considered for progressing to Regulation 19 of the GNL

Approach	Consultation Process	Adoption	Advantages	Disadvantages	Recommendation
1. No additional consultation	<ul style="list-style-type: none"> Does not include Reg. 18 consultation either on new sites or a draft plan Delay of 3 months from current timetable for Reg.19 to Sep. – Oct. 2019 to avoid clash with elections 	March 2021	<ul style="list-style-type: none"> Earliest adoption date as close as possible to the current timetable 	<ul style="list-style-type: none"> It would not be possible to consult at the Regulation 18 stage on amendments required by the revised NPPF; Extremely strong risk of later delays and/or being found unsound as neither the new sites or the draft plan will have been consulted on; Has no advantages over approach 2 as the adoption dates are the same but the risks are greater. 	Not recommended
2. Limited 2nd Regulation 18 consultation	<ul style="list-style-type: none"> 2nd Reg.18 consultation on new sites in Jan. - March 2019 (or Oct. – Dec. 2018) No Reg. 18 consultation on draft plan Delay of 3 months to Reg.19 from current timetable to Sep-Oct 2019 to allow for decision making subsequent to elections 	March 2021	<ul style="list-style-type: none"> Earliest adoption date as close as possible to current timetable Potential to consult on new sites late in 2018, though would be logistically challenging 	<ul style="list-style-type: none"> It would not be possible to consult at the Regulation 18 stage on amendments required by the revised NPPF; Strong risk of later delays and/or being found unsound as the draft plan would not have been consulted on; Difficulty of consulting on new sites ahead of May 2019 elections. 	Not recommended
3. Full 2nd Regulation 18 consultation	<ul style="list-style-type: none"> Informal consultation on new sites Oct. – Dec. 2018 	September 2021 (Option 1) or March 2022 (Option 2) depending	<ul style="list-style-type: none"> Would allow revised NPPF compliant local plans to be consulted on at the Regulation 18 stage; 	<ul style="list-style-type: none"> Option 1 in particular presents a challenging timetable which would require considerable commitment to decisions being made quickly and may require 	Recommended

	<ul style="list-style-type: none"> • 2nd Reg.18 consultation on “draft plan” in Autumn 2019 to allow for decision making subsequent to elections 	<p>on time allowed to get to the Reg. 19 stage</p>	<ul style="list-style-type: none"> • Allows the GNLP to be one of the first plans adopted to have consulted on and incorporated the requirements of the revised NPPF; • Allows more detailed public views on the proposed plan prior to the Regulation 19 pre-submission stage; • Enables comments on all sites (including those recently submitted) to be made; • Adds additional time to allow the evidence base including the SA that supports the preferred approach to be further developed; • A consultation on a “draft plan” would reveal issues that could either be addressed prior to pre-submission publication, or defended through the examination process. 	<p>and joint decision making group;</p> <ul style="list-style-type: none"> • There would be a longer period without a new local plan, though legal advice is that this would have a minimal effect on the status of the adopted local plan and on issues such as the 5 year land supply. 	
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