

## GNDP Board

**Date:** Wednesday 11<sup>th</sup> June 2025  
**Time:** 1.30 to 3.00  
**Location:** Upper Yare Room, Horizon Centre, Broadland Business Park

Board members	Officers
<b><i>Broadland District Council</i></b>	
Cllr Susan Holland	Phil Courtier
Cllr Dan Roper	Ben Burgess
Cllr Martin Booth	Adam Banham
<b><i>Norwich City Council</i></b>	
Cllr Mike Stonard	Sarah Ashurst
Cllr Carli Harper	Mike Burrell
Cllr Adam Giles	
<b><i>South Norfolk Council</i></b>	
Cllr Daniel Elmer	Phil Courtier
Cllr Lisa Neal	Ben Burgess
Cllr Josh Woolliscroft	Adam Banham
<b><i>Norfolk County Council</i></b>	
Cllr Kay Mason Billig	Matt Tracey
Cllr Chris Dawson	Paul Harris
Cllr Graham Plant	
<b><i>Broads Authority</i></b>	
Tim Jickells	Marie-Pierre Tighe
<b><i>GNDP</i></b>	
	Georgie Day

## Agenda

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1	<b>Appointment of the chair</b>  To elect the chair of the Greater Norwich Development Partnership Board in accordance with the Board's terms of reference.	
2	<b>Apologies</b>  To receive Apologies for Absence.	
3	<b>Declarations of Interest</b>  To receive declarations of interest.  <i>(Please note that it is the responsibility of individual members to declare an interest prior to the item if they arrive late for the meeting).</i>	
4	<b>Questions</b>  To consider any questions received from members of the public in accordance with the Board's Terms of Reference.	
5	<b>Minutes</b>  To agree the accuracy of the minutes of the meeting held on 27 February 2024.	4
6	<b>Terms of Reference</b>  Review amends to Terms of Reference.	10
7	<b>Update on GNDP Workstreams</b>  Lead: Mike Burrell, Planning Policy Team Leader, Norwich City Council	14
8	<b>GNLP Review</b>  Lead: Mike Burrell, Planning Policy Team Leader, Norwich City Council	25

**FOR FURTHER INFORMATION PLEASE CONTACT:**

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Norwich, NR1 2DH



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# Greater Norwich Development Partnership

Minutes

## Greater Norwich Development Partnership Board

**Date:** Tuesday, 27 February 2024  
**Time:** 10:00 – 11:00  
**Venue:** Mancroft Room, City Hall, St Peters Street, Norwich, NR2 1NH

### Present:

#### Board Members:

##### Present:

##### Board Members:

##### South Norfolk Council:

Cllr John Fuller, OBE (chair, following election)  
Cllr Lisa Neal

##### Officers:

Phil Courtier  
Helen Mellors

##### Broadland District Council

Cllr Susan Holland (vice chair, following election)  
Cllr Stuart Beadle

*(Phil Courtier and Helen Mellors – see above)*

##### Norwich City Council

Cllr Mike Stonard  
Cllr Matthew Fulton-McAlister  
Cllr Emma Hampton

Graham Nelson  
Sarah Ashurst

##### Norfolk County Council:

Cllr Kay Mason Billig

Matt Tracey  
Richard Doleman

##### Broads Authority

Tim Jickells<sup>1</sup>

##### Greater Norwich Development Partnership

Mike Burrell

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<sup>1</sup> Subsequent to the publication of the agenda papers, the Broads Authority confirmed that Tim Jickells is its representative on this board.

## **In attendance:**

Natalie Beal (Broads Authority), Tom Kirkup (South Norfolk and Broadland Councils), Jackie Rodger and Leonie Burwitz (Norwich City Council)

## **1. Election of Chair and Vice Chair**

**RESOLVED** to elect, in accordance with the terms of reference for the Greater Norwich Development Partnership Board:

- (1) Councillor John Fuller, OBE, as Chair:
- (2) Councillor Susan Holland as Vice Chair.

## **2. Apologies**

Apologies were received on behalf of Councillor Josh Woolliscroft (South Norfolk Council), Councillor Martin Booth (Broadland District Council), Councillors Lana Hempsall and Graham Plant (Norfolk County Council), and Marie-Pierre Tighe (Broads Authority).

## **3. Declarations of Interests**

There were no declarations of interests.

## **4. Minutes**

**RESOLVED** to agree the accuracy of the meeting held on 15 November 2021.

## **5. Adoption of the Greater Norwich Local Plan**

The chair introduced the report and paid tribute to the members of the Greater Norwich Development Partnership and officers, past and present, who had contributed to the preparation of the Greater Norwich Local Plan (GNLP) over the last 8 years, and on the previous development plan, the Joint Core Strategy (JCS) which had been substantial to the review. There had been a good response to the call for sites and consultations. Part of the public examination had been conducted during Covid and held online. Concerns had been discussed with the Inspectors and with each other. In conclusion, this had led to a good plan that they could all be proud of.

Mike Burrell, the Greater Norwich Planning Policy Manager, introduced the report and gave a presentation on the outcome of the examination into the GNLP, the benefits of the plan, and the timescale for its adoption. During the presentation, at the chair's instigation, Mike Burrell explained the special meaning of the Key Diagram which summarised the GNLP Strategy. Schemes, identified in the Key Diagram, had major significance, and it was an important part of the strategy, such as the Growth Triangle for employment and housing growth to the northeast of the city.

During discussion, the chair welcomed the identification of the 5-year land supply. There were comments from the public and in the press that the GNLP was out of date due to changes occurring all the time, such as the developers withdrawing from developing Anglia

Square or delayed development due to Nutrient Neutrality. The Inspectors have taken the latter into this into account and therefore the plan was unaffected in this regard. Mike Burrell confirmed that despite the developers withdrawing from the development of Anglia Square, there was still provision for the 5-year land supply in the GNLP. The Inspectors had reached a conclusion prior to the Anglia Square decision but it was immaterial as a 5- year land supply could be identified without it. Anglia Square was a strategic regeneration area, with extant planning permission, and its inclusion in the plan was critical to provide confidence to future investors. Councillor Stonard said that Norwich City Council was doing its best to bring forward development on this site.

Members noted that the GNLP had taken over 7 years to produce, which was in line with the national average, and as Councillor Holland summed up, demonstrated the thoroughness of the process.

During discussion Councillor Stonard noted the remarkable relationship of the partner authorities that made up the Greater Norwich Development Partnership and the maturity of the councils working together, despite having different political compositions, to develop a plan that was beneficial to local people in the Greater Norwich area.

The chair pointed out that whilst the GNLP was in the names of the three district councils (local planning authorities) there was a history of working in close collaboration with the county council as members of this partnership to use income generated for infrastructure provision through joint development. He was pleased that the county council had allowed the use of CIL (community infrastructure levy) as leverage for more school provision. Councillor Mason Billig referred to the shared objectives of both county and district councillors to support their areas and stated her continued support for partnership working and ensuring that infrastructure was provided.

Councillor Neal updated the board on the progress of the South Norfolk Village Cluster plan. There had been some delay as some changes had been required following consultation and it was expected to be ready for adoption by the end of 2024 or early 2025. South Norfolk Council acknowledged that there had been a lot of development to its main towns and service centres under the JCS and further development there would cause additional pressure. The council was aware that some residents liked living in the more rural location of a village. There was threat to village facilities, such as schools and shops, without younger people and families moving in to provide vibrancy. The plan would identify sites for 1,200 new homes in these village clusters and would be part of the local plan. Councillor Neal said that she was pleased with the plan which stems from the GNLP and demonstrated that the South Norfolk Council had listened to its residents.

In conclusion, the chair referred members of the board to the list of modifications contained in the Inspectors' report and the recommendations to the local planning authorities (the three district councils) to adopt the GNLP as presented, allowing 6 weeks where the plan was subject to legal challenge. It was noted that most of the modifications were typographical and not substantial.

Mike Burrell said that there were only two grounds for challenge: if it was not within the powers of the local planning authorities to produce a local plan; or the production of the local plan did not follow the legal process, and assured the board that it was unlikely that there were valid grounds for challenge. The three district councils had the power to produce a local plan and that the correct process to produce the local plan had been followed. The

plan had been subject to external examination by the Planning Inspectorate and found sound with modifications.

**RESOLVED** to agree that Broadland District Council, Norwich City Council and South Norfolk Council be recommended to:

- (1) note the inspectors' report (in annex 1) and include the required main modifications in Appendices 1 to 5 (available from [this link](#)) in the GNLP;
- (2) adopt the GNLP available from [this link](#).

## **6. The Continuation of the Greater Norwich Development Partnership**

The chair introduced the report stating that no sooner than a plan was adopted work started on the next one, which he hoped would be a quicker and more direct process. It was critical for the councils, residents, and businesses that this unique partnership was maintained.

Mike Burrell presented the report which sets out the revised terms of reference and proposed the continuance of the Greater Norwich Development Partnership. It was proposed that this board would meet at least twice a year as a minimum. It had not met for a couple of years whilst the GNLP was undergoing the examination stage. A project manager would be appointed based at Norfolk County Council, supported by the planning policy teams at South Norfolk/Broadland and Norwich City Council. Mike Burrell would return to his substantive post at the city council. The report also contained the proposed workstreams following the adoption of the GNLP.

The chair commented on the government's proposal for Local Plan production to ensure completion within 3 to 4 years, with plans that were less proscriptive and with more zoning, and said that whilst he was aligned to there being no central planning policy officer resource for the GNDP, the districts needed to be flexible and adjust positions when required. He referred to the workstream and suggested that for instance all councils would be involved in the new settlements evidence. Both Councillors Stonard and Holland concurred and noted that it was in the interests of the residents of their respective councils to provide resources to support the partnership.

The chair pointed out that the terms of reference recommended reverting to the previous practice of rotation of the chair and that the schedule was laid out in the report.

The chair thanked Mike Burrell for his work on the GNLP.

**RESOLVED** that Broadland District Council, Norwich City Council and South Norfolk Council be recommended to agree:

- (1) The Partnership should continue to operate under the revised GNDP terms of reference set out in annex 1 of this report;
- (2) The broad outline of the GNDP's forward work programme and staffing subsequent to proposed Greater Norwich Local Plan (GNLP) adoption, as set out in this report should provide the basis for ongoing GNDP work.

## **7. East Norwich Supplementary Planning Document (SPD) progress update**

(Judith Davison, Planning Policy Team Leader, Norwich City Council, attended the meeting for this item.)

Sarah Ashurst, Head of Planning and Regulatory Services, Norwich City Council, introduced the report. The GNLP provides the strategic policy and there was a commitment to provide a supplementary planning document for East Norwich, for the redevelopment of this key quarter.

Judith Davison, Planning Policy Team Leader, Norwich City Council, presented the report which updated the board on the progress of the East Norwich SPD. It was an iterative process which had commenced in October/November 2023 once the GNLP strategy was clear, and involved the city council, South Norfolk Council, Broadland District Council, and the Broads Authority. The regeneration area was included in the GNLP area and part of the Broads Authority. The board's attention was drawn to the anticipated timescales for adoption of the SPD with authorisation to consult being sought in July from the city council's and South Norfolk Council's cabinets and the Broads Authority, and statutory consultation being held for 6 weeks from early August.

Councillor Stonard spoke in support of the proposed redevelopment of the East Norwich, stating that it was owned by 4 different landowners and the size of 80 football pitches, and would provide a new quarter for the city, with housing of high-quality sustainable development and encapsulating the maintenance of heritage buildings and former warehouses, into this urban regeneration site. There was even a dog graveyard of around 20 former pets of the Colman family.

Tim Jickells said that the redevelopment of East Norwich was important to the Broads Authority, as it would provide housing and improve connectivity between the city and the Broads National Park. He considered it an exciting opportunity.

**RESOLVED** to note the contents of the report.

(The meeting ended at 11:00)



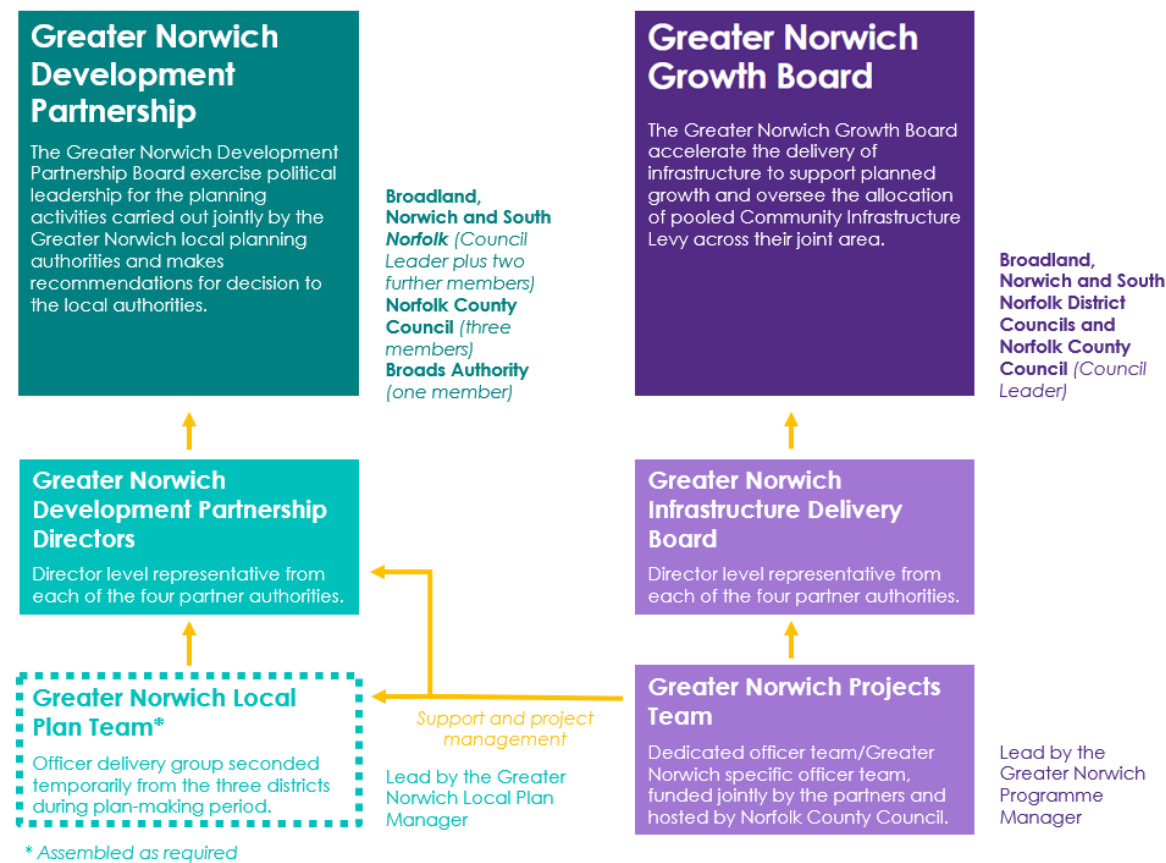


# Greater Norwich Development Partnership Board Terms of Reference

ADOPTED

## 1. The Greater Norwich Development Partnership

The Greater Norwich Development Partnership, hereafter “the Partnership” comprises Broadland, Norwich and South Norfolk councils, working with Norfolk County Council and the Broads Authority.



## 2. Function of the Board

The Greater Norwich Development Partnership Board (“the Board”) exercises political leadership for the planning activities carried out jointly by the Greater Norwich local planning authorities and makes recommendations for decision to the local authorities. The Board itself has no formal decision-making authority.

### **3. Responsibilities**

The Board is responsible for:

- making recommendations to the councils on joint planning matters and initiatives affecting the Broadland, City of Norwich and South Norfolk administrative areas in the context of national and local strategic planning policies;
- overseeing the preparation of a joint Local Plan or co-ordinated Local Plans for the three district local planning authorities, to include integrated land-use and transport policies;
- agreeing or amending any joint communications protocol agreed in accordance with its duties;
- overseeing the work of any joint local plan making activities, ensuring all parties work together effectively;
- ensuring timely and effective monitoring of the implementation of the adopted Local Plan;
- facilitating joint working between the local planning authorities and the local transportation authority on matters of common interest and benefit;
- reviewing the Community Infrastructure Levy or introducing a new Infrastructure Levy as appropriate and
- ensuring the work of the Greater Norwich Growth Board reflects the needs of the GNDP..

### **4. Membership of the Board**

The Board comprises:

- up to three serving members from each local planning authority including the Leader and Planning Portfolio Holder;
- up to three serving members from Norfolk County Council;
- one member from the Broads Authority.

The Board is supported in its role by director-level representation from each local authority and advisors who will be seconded onto the Board when necessary.

Members may submit substitutes when unable to attend themselves, in agreement with the Chair. Representatives from the Partnership's Local Plan teams will attend when required.

### **5. Chair and Vice Chair**

At the first meeting of the reconvened Board a Chair and Vice Chair will be elected from among its district members on a rotating basis.

The Chair and Vice Chair will be rotated annually. The Chair and Vice Chair for each period will be appointed at the first GNDP Board meeting in each new financial year, and will hold the post until the first GNDP Board meeting in the next financial year or until:

- a new Chair is elected in accordance with the paragraph above;
- they cease to be a member of the Board; or
- they resign from the office of Chair or Vice Chair.

It is anticipated that the chair and vice chair will be from the three district councils as follows:

	GNDP Chair	GNDP Vice Chair
2024/25	South Norfolk	Broadland
2025/26	Broadland	Norwich
2026/27	Norwich	South Norfolk
2027/28	South Norfolk	Broadland

Where a casual vacancy arises in the office of Chair or Vice Chair of the Board, the Board will elect a replacement at the next meeting of the Board.

If both the Chair and Vice Chair are absent from a meeting or are unable to act as Chair, the Board will elect one of the local authority members to preside for the whole or balance of the meeting.

**6. Project Manager**

The GNDP Project Manager will be an officer appointed to support the Board. The pay and on-costs for this officer will be met by Broadland District, Norwich City and South Norfolk Councils, with each district providing an equal share of the costs. The GNDP Project Manager will be responsible for the project management of the GNDP work programme and will be accountable to the three funding Councils. In order to make use of existing expertise and for reasons of operational efficiency, the GNDP Project Manager will be employed by Norfolk County Council.

The functions of the GNDP Project Manager are:

- to maintain a record of membership of the Board;
- to maintain a register of Board members’ interests;
- to maintain the Forward Plan;
- to summon meetings of the Board in accordance with section 7 below;
- to prepare and send out the agenda for meetings of the Board in consultation with the Chair and the Vice Chair;

- to keep a record of the proceedings of the Board;
- to take such administrative action as may be necessary to give effect to resolutions of the Board;
- to liaise with directors and planning policy managers to determine the content of officer and member meetings and the ongoing work programme.
- to project manage the GNDP work programme, as agreed by the Board
- such other functions as may be necessary to ensure delivery the GNDP work programme or otherwise determined by the Board.

## **7. Frequency and conduct of meetings of the Board**

Meetings are held at least twice a year dependent on the content of the agreed work programme.

Meetings will be held in public as far as possible and live streamed via an appropriate and publicly accessible video streaming platform.

Members of the public may submit questions to the Board in respect of the development/monitoring of the Greater Norwich Local Plan (GNLP) or other matters that are before the Board. Questions are required to be submitted three working days before the meeting to the Project Manager. The time allowed for questions and responses will be limited to 15 minutes in total. There is no guarantee that all questions will be able to be answered in the given time and it is at the discretion of the Chair on the day as to whether the time available for questions should be extended. Questions and responses will be minuted.

Recommendations of the Board are unanimous. All members of the Board, or their agreed substitutes must be present, therefore.

The Board will comply with The Code of Recommended Practice for Local Authorities on Data Transparency.

## **8. Amendments to the Terms of Reference**

Amendments will only be made to these Terms of Reference with agreement of the Partnership.

ITEM 7	
Update on GNDP Workstreams	
Summary:	This report updates the Board on Greater Norwich Development Partnership (GNDP) workstreams.
Recommendation:	For Information.
Contact officers	Mike Burrell, Norwich City Council Planning Policy Team Leader <a href="mailto:MikeBurrell@norwich.gov.uk">MikeBurrell@norwich.gov.uk</a> 01603 987964
Background docs	None

1. Background

- 1.1 The last GNDP Board meeting took place in February 2024. The Board recommended adoption of the GNLP, which took place at each of the three districts in March 2024.
- 1.2 A report called ‘The Continuation of the GNDP’ (Item 7), was tabled at this meeting. This included a table of GNDP Workstreams. This report updates against these items.
- 1.3 Further items have been added to reflect subsequent national and local planning changes and on-going role and administration of the GNDP.

2. GNDP Board meetings

- 2.1 GNDP Board meetings have been scheduled for the rest of the year and into 2026. These are scheduled for October and January. If they are not required meetings can be cancelled, but it is foreseen that with the pace of government policy changes for planning policy, these will be useful opportunities to review what is going to be required of the GNDP in coming years

3. Director meetings

- 3.1 Directors’ meetings have been on-going since adoption of the GNLP, and continue on a monthly cycle.
- 3.2 Mike Burrell chairs these meetings.

#### 4. Project Support

- 4.1 A new GNDP Project Manager, Georgie Day, has been appointed, and began work in November 2024. The project manager is responsible for co-ordinating and supporting workstreams and meetings.

#### 5. Monitoring

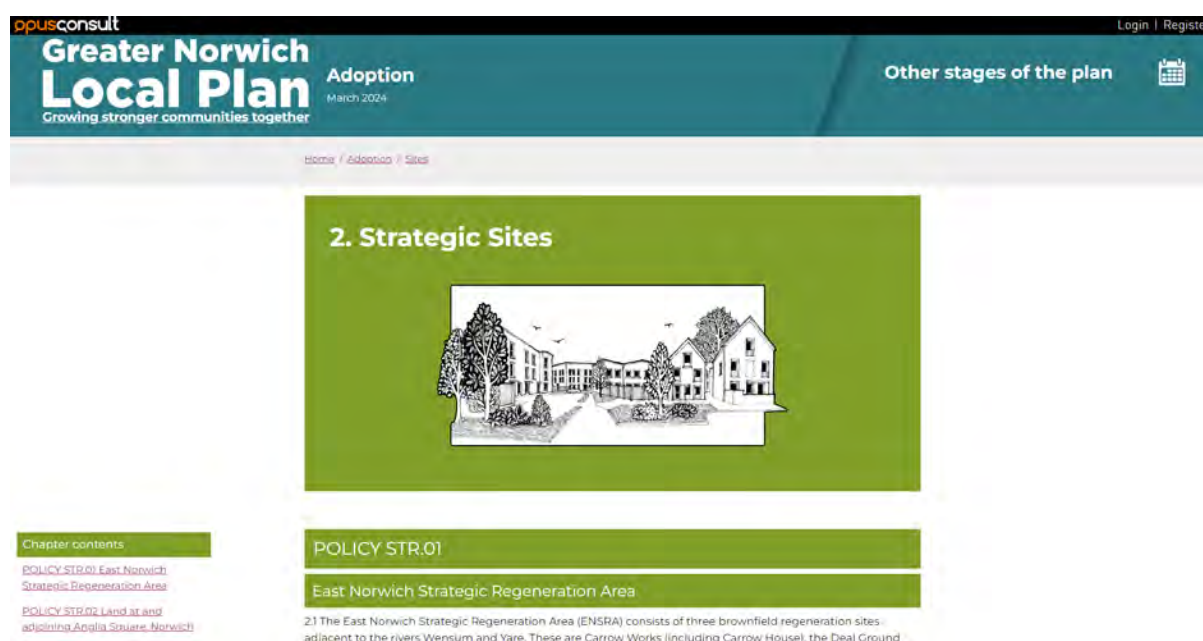
- 5.1 Monitoring workshops have been underway since the end of last year to join-up and coordinate monitoring across the GNDP and its partners. It is hoped this will improve efficiency and output.
- 5.2 A draft version of AMR 2023/24 is now complete. The document is being overseen and coordinated by the GNDP project manager with districts compiling the background data and inputting into the narrative.
- 5.3 The 2023/24 AMR is a hybrid document, monitoring against indicators from the Joint Core Strategy (JCS) and some from the indicators from Greater Norwich Local Plan (GNLP), which was adopted in March 2024 creating a small monitoring period overlap.
- 5.4 This is an opportunity to establish a baseline for some of the core GNLP indicators and to get an early look at progress against some of measures identified in the most recent Local Plan as important.
- 5.5 Work has also begun on AMR 24/25, which will be monitor wholly against indicators from the GNLP.
- 5.6 The following aspirations have been identified for the new GNLP AMR 24/25:
- Improved sites monitoring, potentially including site statuses on interactive GIS map.
  - Use PowerBI and other digital tools to create an interactive face to the AMR which highlights the good news stories and areas of priority.
  - Improve the impact of the AMR in line with Planning Advisory Service recommendations:
    - Demonstrate how the GNDP is delivering against the policies and objectives of the GNLP;
    - Communicate the work of the GNDP to members, across teams within the council, and to communities;
    - Demonstrate real outcomes such as sites regenerated, houses built and jobs created;
    - Identify areas where objectives aren't being met and changes to policy or development management are necessary;
    - Gather evidence to inform future policy.

- Timeframes will be streamlined.
- Format to be improved to make the document more user friendly, including the use of graphs and charts.
- Sharepoint to be utilised to make compiling data easier for officers.

## 6. Website

6.1 The [GNLP website](#) is live. There is a web version and a downloadable PDF version of the three adopted GNLP documents (the Strategy, Sites Plan and Monitoring Framework). The web and pdf versions of the Strategy and Sites Plan include photos/illustrations, the latter produced by a member of the Norwich landscape team. The format has been developed so that the information can be accessed in a straightforward way, with interactive prompts added to improve navigation. The previous [Joint Core Strategy](#) is also available on the website.

6.2 An illustrative screenshot of the interface is shown below:



6.3 Hard copies are available to Board members. They will also be made available to other elected members and officers on request to the GNDP Project Manager.

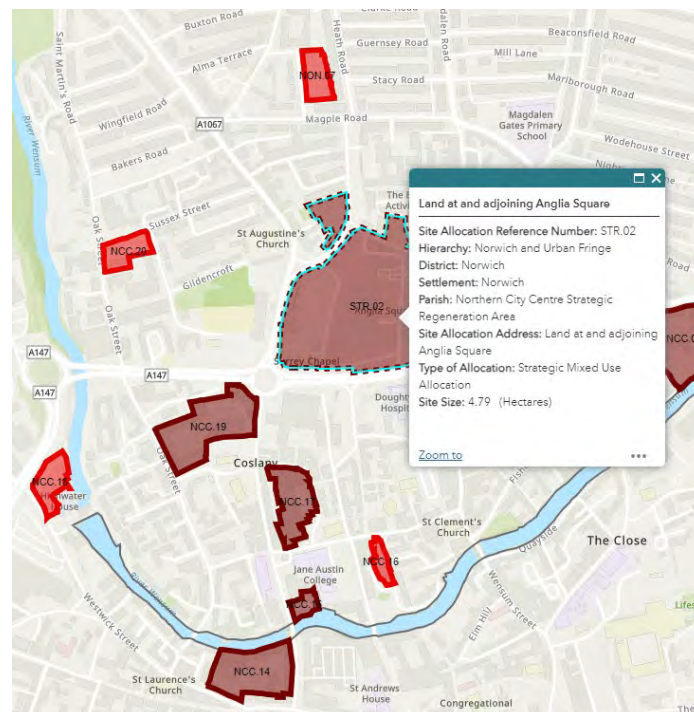
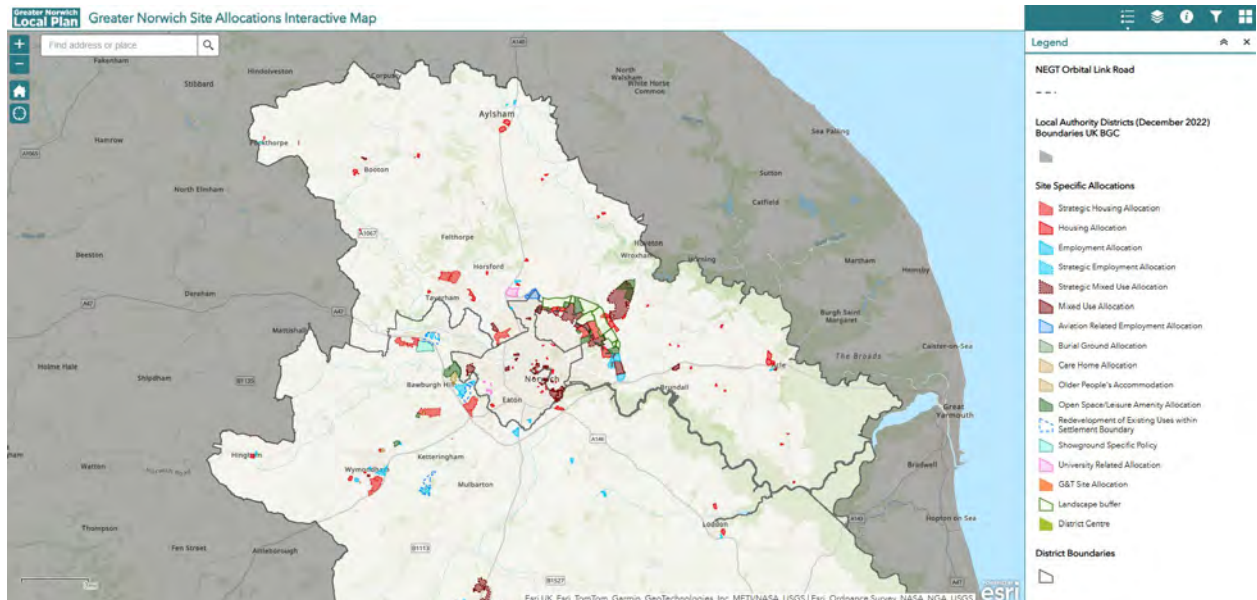
## 7. GNLP Interactive Map

7.1 An Interactive GNLP GIS Map has been added to the website at this [link](#). It provides information on site allocations for use by members, officers and the public.



7.2 The map shows details of GNLP, Area Action Plan and Neighbourhood Plan allocation sites which can be clicked on to reveal further detail in policy documents.

7.3 The map interface appears as in the screenshots below:



- 7.4 Phase 2 of the project will look to link the map to the annual monitoring process, so that clicking on sites will also provide information about each site status.

## 8. Digitalisation

- 8.1 Following the link [here](#), you will be able to view a video introducing the capability of PlaceMaker – a digital Local Plan tool developed by Urban Intelligence. It gives an indication of what will be possible to achieve through digitalisation for a Local Plan review. Indeed, with the plan-making period being shortened to 30 months, it will be essential to utilise this kind of software.

- 8.2 The report looking in detail at digitalisation opportunities is being prepared for a workshop with planning policy and digital teams later this month. The findings of this will be presented at the next board meeting.

## 9. Planning Awards 2025

- 9.1 The GNLP has been shortlisted for the Plan Making category at the Planning Awards 2025 sponsored by Planning and Placemaking Resource. The team will be attending an awards ceremony in the evening following the Board Meeting on Wednesday 11<sup>th</sup> June, where the winner will be announced.

## 10. RTPI East of England Awards for Planning Excellence 2025

- 10.1 The GNLP has also been shortlisted for the Best Plan category at the East of England Awards for Planning Excellence 2025 Awards. The results will be announced at the ceremony on Wednesday 18<sup>th</sup> June.

## 11. Supplementary Planning Documents / Advice Notes

### 11.1 Policy 2 Sustainable Communities - Advice Note or Supplementary Planning Document

- 11.1.1 As GNLP policy 2 on Sustainable Communities is a broad ranging policy which aims to ensure that development is well designed and sustainable, the GNLP commits us to producing an advice note or supplementary planning document detailing the policy 2 requirements and signposting developers to relevant guidance such as Building for a Healthy Life and the National Design Guide.

- 11.1.2 The advice note / SPD will provide advice to developers on the content of the Sustainability Statements they must submit with major planning

applications to show how their development will meet the policy requirements.

- 11.1.3 Work is underway. Consultation is anticipated for September and adoption in January 2026.

**11.2 Policy 3 Environmental Protection and Enhancement: Delivery of on-site or off-site SANGS – Advice Note or Supplementary Planning Document.**

- 11.2.1 Policy 3 requires all residential development to provide Suitable Alternative Natural Green Space (SANGS) to limit the recreational impact of growth on protected habitat sites. An SPD is being developed to provide guidance for on-and off-site provision, including standardised charges and guidance.

- 11.2.2 This SPD will also allow adoption the Greater Norwich Green Infrastructure Strategy.

- 11.2.3 Work is underway. Consultation is anticipated for September and adoption in January 2026.

**11.3 Policy 5 Homes – Purpose Built Student Accommodation (PBSA) – Advice Note or Supplementary Planning Document**

- 11.3.1 A report has been produced by consultants Aecom into the need for further PBSA in the city. The report has found that the market for PBSA is close to saturation. The report also found that the original pressure on family homes close to UEA generated by the student population has been alleviated by PBSA as intended.

- 11.3.2 A draft SPD which takes account of the above evidence has been consulted on and is being taken through the committee process at Norwich City Council.

**11.4 Policies 5 Homes**

- 11.4.1 Consideration is being given to producing an affordable housing SPD for Norwich which will focus on the collection of commuted sums in lieu of on-site provision.

**11.5 Policies 5 Homes (in as far as it relates to requirements for self-build and custom homes) and 7.5 Self-build and custom build windfall housing development outside defined settlement boundaries - Advice Note or Supplementary Planning Document (SPD)**

- 11.5.1 Policy 5 sets out new requirements for plots for self and custom build homes to be included within sites of 40 or more homes. At least 5%

serviced self and custom build plots will need to be provided. These will have to be advertised and marketed as part of the build out of these schemes. However, such plots will not be required if a lack of need can be demonstrated, or plots have been marketed for 12 months and have not been sold.

11.5.2 Policy 7.5 applies to all parishes in Broadland and South Norfolk. Its purpose is to allow for a limited number of additional dwellings in each parish beyond those allocated or allowed for as larger scale windfall sites through other policies in the GNLP. The policy promotes small-scale self-build and custom build housing development.

11.5.3 South Norfolk and Broadland District Council have produced the Custom and Self-Build Housing Supplementary Planning Document that has been consulted on. It is not necessary for the SPD to cover Norwich. The draft SPD establishes that an agreed marketing strategy, required by condition or S106 agreement, should be provided for policy 5 self and custom build developments in Broadland and South Norfolk. If necessary, such an approach could be followed in Norwich on a case-by-case basis.

## 12. GI Strategy

12.1 The Greater Norwich Growth Board (GNGB) have overseen the delivery of a new Greater Norwich Green Infrastructure Strategy (the strategy). Work began in August 2022 with CBA the commissioned consultants. The final strategy was agreed by GNGB on 11th March 2025. In order to maximise the impact of the strategy and fully embed it within each authority's workstreams, it is intended that it is progressed to be an SPD later this year.

12.2 The Strategy provides an update to the 2007 Greater Norwich Green Infrastructure (GI) Strategy and is driven by an array of changes in policy at national level, and other strategies and plans at a more local level. The most prominent of these are the Environment Act 2021, and locally, the Greater Norwich Local Plan (GNLP - adopted March 2024).

12.3 The 2007 GI strategy and its subsequent delivery plans have been highly effective in providing guidance for the development of and investment in our GI network through a wide array of new developments and GI projects. Notable investment using CIL funding includes the establishment of Broadland Country Park near Horsford and significant improvements to the Marriotts Way and the Yare Valley Walk, including the construction of a new pedestrian bridge between Bowthorpe and Colney. New housing developments have provided significant GI, with



urban extensions around Norwich and developments in our market towns providing new and improved green spaces and links.

- 12.4 The purpose of the updated strategy is to help manage and improve existing GI assets, increase the level of GI provision to address identified deficiencies or needs, and develop a network of multi-functional spaces which will deliver biodiversity net gain and other natural assets. It sets out clear priorities for GI delivery which will provide a framework for directing future resource and help lever in additional funding.
- 12.5 The strategy has been developed to align with the methods and principles of Natural England's Green Infrastructure Framework, and in alignment with the emerging Norfolk Local Nature Recovery Strategy.
- 12.6 The Strategy and delivery plan have been developed in collaboration with local partners and input from a broad range of internal and external stakeholders. A public consultation held in Spring 2023 received 1,052 responses, and a series of workshops held in July and September 2024 had participation from 35 organisations representing the public, private and third sector.
- 12.7 The delivery programmes and work areas are split into two broad categories:
- Active Places - provision of accessible green spaces and links to support people's physical health and mental wellbeing
  - Natural Places - provision of nature-rich habitats to support nature recovery and strengthen climate resilience
- 12.8 Work has begun to develop a pipeline of projects and begin implementation of the strategy.

### **13. Design Codes**

- 13.1 Following a successful application for national funding, the South Norfolk and Broadland Design Code is being produced by the consultant Tibbalds. The consultation for this piece of work began on 12<sup>th</sup> May 2025.
- 13.2 The Broads Authority adopted Design Guide and Code for the Broads SPD in March 2025.

### **14. Infrastructure Funding (CIL or Infrastructure Levy (IL))**

- 14.1 Since the new government does not support the roll out on the Infrastructure Levy (IL), a decision will need to be made on progressing a review of the CIL.

**15. Anglian Water/Whitlingham**

- 15.1 The sewage works (Waste Water Recycling Centre (WWRC)) at Whitlingham is operated by Anglian Water (AW) and it is Permitted (i.e. regulated) by the Environment Agency (EA). In recent weeks both bodies have advised the Local Planning Authorities (LPAs) for Broadland, Norwich and South Norfolk Councils that the Whitlingham WWRC is at capacity and therefore no more planning permissions should be granted without onerous restrictions being placed upon the respective permission.
- 15.2 Anglian Water has secured Asset Management Period (AMP) funding for the required upgrades to address capacity as part of the AMP process which provides for a 5-year investment programme up until 2030. It is anticipated that these works could be delivered as early as 2028. In addition, Anglian Water has secured £2 million of funding to deliver network improvements which will reduce the water ingress into the system and improve capacity. As such, the current lack of capacity at Whitlingham is considered to be temporary.
- 15.3 The EA has produced a technical report and modelling which demonstrates that there is likely to be minimal impact to the environment from proposed development and unlikely to be a class deterioration (e.g. Moderate to Poor) in WFD element status.
- 15.4 The Greater Norwich Development Partnership (GNDP) requires its own evidence to balance the lack of information to show the environmental risk of additional flows against the significant benefits of additional housing.
- 15.5 Consultants Sweco have been commissioned and are undertaking the evidence study.
- 15.6 The final report is expected by the middle of July.
- 15.7 In the meantime, a position statement has been drafted and is being used by DM officers outlining an interim position which will be used by Broadland District Council, Norwich City Council and South Norfolk Council. This outlines that LPAs will not impose the requested condition, which it considers to be flawed. In respect of each application received, Officers will assess the risk to the environment and amenity from the issue which has been brought to its attention by AW and will weigh that against the benefits of the development in the planning balance.
- 15.8 The councils will require an EIA for development within Schedule 2 of the The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 where officers are of the opinion that due to the nature

or extent of the development, the volume of wastewater arising will result in a significant risk of harm to the environment.

- 15.9 Where they consider that the balance is in favour of development a recommendation for approval (subject to other material considerations) will be made.

15.10 Legal consultants Birketts have advised on this document.

15.11 For information, Anglian Water have raised a concerns about other Waste Water Recycling Centres in the Greater Norwich Area.

## **16. New Settlements**

16.1 The New Towns Taskforce, set up by government to advise ministers on locations for significant new communities and large urban extensions, issued a call for evidence which has now closed.

16.2 In its statement, the Taskforce, chaired by Sir Micheal Lyons, said that it would deliver the list of locations "by July 2025". The Taskforce has stated that it is "interested in proposals that are regionally significant for both housing numbers and economic growth" and wants "a gold standard of 40 per cent affordable housing". New towns will need to deliver between 10,000 and 25,000 homes.

16.3 A representation has been submitted by South Norfolk.

16.4 It is possible that a new development corporation could be set up to deliver a local new town.

16.5 If a new settlement is supported by government it will likely be integral to any GNLP Review (see also the GNLP Review report on this agenda).

## **17. GIRAMS**

17.1 Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) are measures required to protect internationally designated habitat sites in the sub-region from the recreational impact created through growth and development.

17.2 The county-wide Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan has been produced and approved to provide an updated position on this issue. This details sites, measures and associated costs and includes an increase in costs to developers of £60 per dwelling to just over £300 per dwelling.

## **18. Health Protocol**

- 18.1 A revised protocol has been taken through councils in Norfolk and East Suffolk. The protocol helps understand demand and capacity for NHS services and assists in the consultation process for preparing local plans and determining planning applications.



ITEM 8	
Potential Greater Norwich Local Plan Review	
Summary	<p>This report covers the next steps for local plan making in Greater Norwich. It recommends firstly that the Greater Norwich Local Plan (GNLP) should be reviewed in line with the timetables already submitted to government in the Indicative Broadland, Norwich and South Norfolk Local Development Schemes. Secondly, it recommends that the councils should engage in collaborative work to inform and influence future production of a Spatial Development Strategy.</p>
Recommendations	<p>That Broadland, Norwich and South Norfolk Councils be recommended to progress the review of the GNLP in line with the timetables already submitted to government in the Broadland, Norwich and South Norfolk Indicative Local Development Schemes.</p> <p>That Broadland, Norwich and South Norfolk Councils be recommended to engage in collaborative work to inform and influence future production of a Spatial Development Strategy.</p>
Contact officers	<p>Mike Burrell, Norwich City Council Planning Policy Team Leader</p> <p><a href="mailto:MikeBurrell@norwich.gov.uk">MikeBurrell@norwich.gov.uk</a></p> <p>01603 987964</p>
Background docs	<p>None</p>

## Introduction

1. England has a plan-led planning system. Local plans are a key tool for encouraging and directing investment, helping to secure the housing, jobs, and infrastructure that places need. They provide stability and certainty for communities, businesses, and developers.
2. The Greater Norwich Local Plan (GNLP) was adopted by Broadland, Norwich and South Norfolk in March 2024. This followed a positive recommendation on adoption from this board in February 2024.
3. Significant changes were made to the National Planning Policy Framework (NPPF) in December 2024. The changes, most importantly the 34% increase in the local housing need (LHN) for Greater Norwich, mean that the housing requirement of the GNLP is no longer consistent with government's assessment of housing need. As a result, it is expected by government that the local plan for Greater Norwich will be updated, most importantly to include additional housing sites to meet the additional needs.
4. In response to an instruction from government to all local planning authorities (LPAs), Broadland, Norwich and South Norfolk submitted updated plan-making timetables through revisions to their Local Development Schemes (LDSs) in March 2025. The LDSs were termed "Indicative" to reflect that there may be a need to amend them once more information on the revised plan making system was provided by government following from consultation on plan-making reforms in 2023.
5. The LDSs included a review of the GNLP which would require scoping work to start on plan review in October 2025 and which would enable an up-to-date local plan with additional housing allocations to be adopted in March 2029.
6. The Government has now responded to the 2023 consultation on plan-making reforms. Its [response](#) sets out that, as proposed in the consultation and anticipated in the Indicative LDSs for Broadland, Norwich and South Norfolk, local plans will:
  - i) Be simpler and faster to prepare, to be adopted within 30 months of the plan making process commencing.
  - ii) Undertake a scoping process prior to producing a Project Initiation Document (PID) to commence plan-making.

- iii) Be positively shaped by the views of local communities, involving enhanced engagement with residents and stakeholders throughout the plan-making process.
  - iv) Be digitalised to improve accessibility and efficiency.
  - v) Be standardised and clearer, subject to proportionate and relevant evidence requirements, gateway assessments, production milestones and streamlined examinations.
7. Government has committed to providing support and resources to assist the above, including guidance and best practice examples.
8. This report primarily details reasons for the GNLP recommending to Broadland, Norwich and South Norfolk that the GNLP should be reviewed in line with the timetable set out in the LDSs.
9. In this respect, the report also sets out two potential alternative options. These are firstly producing separate local plans for each district or secondly not producing a new local plan, instead continuing to rely on the adopted GNLP to guide decisions on planning applications. Both approaches would require amendments to the LDSs. This report details reasons for not recommending these alternatives.
10. Any type of local plan review would almost certainly be adopted by the new unitary council/s (see paragraph 39 for further details).
11. Local plan review provides an opportunity to progress the delivery of a new settlement or settlements in South Norfolk (see paragraph 33 to 35 for further details).
12. If devolution for Norfolk and Suffolk is taken forward following the recently closed [consultation](#), work on a new Spatial Development Strategy (SDS) for the two counties is likely to progress. SDS adoption is currently planned by government to be in 2029. Since the adopted SDS will provide the strategic framework for future local plans (see further details in paragraphs 21 to 27 below), this report recommends that the councils work collaboratively to inform and influence the SDS.
13. There is the opportunity for work on the SDS and a Greater Norwich local plan review to share an evidence base. The statutory duty for the authorities is to complete a review of the local plan at least every 5-years from the date of adoption (i.e. by March 2029 for Greater Norwich). However, there is also a clear national expectation that significant changes in circumstances e.g. a significant change in local housing need, will mean that reviews need to take place earlier than the statutory

minimum and that local plans should be updated as necessary to ensure they are kept up-to-date and remain effective. It is a clear that one of the Government's national policy priorities is to urgently meet increased housing needs. This means that it is not advisable to wait until the SDS is in place to review the local plan for Greater Norwich.

## Background

14. The December 2024 changes to the NPPF and existing legislation mean that the statutory duty to review a local plan to make it up-to-date applies to the GNLP due to:
  - The NPPF's requirement for a review of strategic local plans such as the GNLP within 5-years of their adoption where **significant changes** occur to housing need. Paragraph 34 of the NPPF specifies that *"Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly"*. Furthermore, paragraph 232 of the NPPF gives a very strong steer that local plans will be considered out of date after 5 years if they are not in line with the increased levels of housing need. The 34% increase in Greater Norwich's housing numbers clearly means that the LHN figure has changed significantly.
  - The fact that there is currently a lack of a 5-year supply in Greater Norwich is further evidence that, although recently adopted, the housing requirement of the GNLP is not up to date following the December 2024 changes to the NPPF. The lack of a 5-year land supply largely results from the Nutrient Neutrality requirements which have applied to much of the area since 2022. Changes concerning the operation of the 5-year land supply which will apply to Greater Norwich from 2026 onwards will further reduce the prospect of having a housing land supply.
  - Regulation 10A of the Town and County Planning (Local Planning) (England) Regulations 2012 which requires that local plans are reviewed at least every 5 years.
15. Government wants to see allocations made to provide for the additional homes needed because of the December 2024 NPPF changes as soon as possible to help to achieve its ambition for a major increase in housing provision. Increasing housing numbers is the Government's highest domestic policy priority.

16. The Government's policy priority to update local plans has been emphasised in recent letters concerning local plans. This includes the [6th February 2025 letter](#) from Minister of State for Local Government and English Devolution Jim McMahon to Norfolk councils on local government reorganisation (LGR) which states *"It is essential that councils continue to deliver their business-as-usual services and duties, which remain unchanged until reorganisation is complete. This includes progress towards the Government's ambition of universal coverage of up-to-date local plans as quickly as possible"*.
17. Further to this, government is now intervening in local plans where LPAs are not meeting their statutory duty to produce an up-to-date local plan. Recent examples are:
  - South Tyneside, where members sought to delay plan-making, but the Minister for State for Housing and Planning Matthew Pennycook has instructed that the emerging plan must be submitted for examination.
  - Oldham requested that the adopted joint local plan for the Greater Manchester area *"Places for Everyone Joint Development Plan"* should be revoked for their borough. This resulted in Pennycook refusing the revocation, making it clear in [this letter](#) that the Government expects local authorities to do everything in their power to provide up-to-date local plans and will use its ministerial intervention powers to ensure that such plans are in place in line with the statutory duties of local authorities. Pennycook's letter to Oldham was unequivocal in stating *"Authorities that fail to maintain an up-to-date plan are failing their communities"*.
18. Government's intervention power is in Section 27 of the Planning and Compulsory Purchase Act 2004. This allows the Secretary of State (SoS) to intervene if *"a local planning authority are failing or omitting to do anything it is necessary for them to do in connection with the **preparation, revision** or adoption of a development plan document"*. This intervention would allow the SoS to **"prepare or revise"** the document. Where implemented, the LPAs would both lose control of local plan production and would be required to pay the SoS for plan production. As the Greater Norwich LPAs have all submitted LDSs which commit to plan review, failure to work on the review could be a justification for SoS intervention.



19. Having a local plan in place supports a healthy local economy, with housing allocations, job and infrastructure provision and environmental protection. Not updating local plans will lead to poorly planned development, particularly for housing, which will meet the higher housing needs required by the December 2024 NPPF but could be in sub-optimal locations that would be unlikely to be supported by the full range of infrastructure necessary for growth. The options table in Appendix 1 on the next steps for local plans in Greater Norwich addresses these points in further detail.
20. The Government has said that regulations, policy and guidance for the new plan-making system to be confirmed later this year will include a familiarisation period for scoping work on local plans, with “*tailored support*” from Government for LPAs at the forefront of the new system. The Government has also said that there will be “*more definitive proposals for a phased rollout of local plans in spring 2025*”. Recent and upcoming officer meetings with Ministry for Housing, Communities and Local Government (MHCLG) civil servants may be part of establishing Greater Norwich’s place in the phased rollout.

### Spatial Development Strategies

21. The Planning and Infrastructure Bill sets out the forthcoming requirement for SDSs which will form part of development plans following their adoption.
22. As part of a push towards more devolution nationally, [consultation](#) on establishing a Norfolk and Suffolk Mayoral Combined Authority took place in early 2025. If established, an important duty of the mayoral authority would be to produce an SDS.
23. SDSs are likely to be concise documents which will cover strategic infrastructure, housing and environmental issues, most likely replacing the Duty to Cooperate when adopted. The SDSs will cover the amount and distribution of housing, possibly including any new settlements, **but not site allocations**. Thus, we can expect housing figures for the new unitary authorities. Site allocation will remain the role of local plans, which will need to be reviewed as soon as possible as stated above.
24. If Greater Norwich were to delay reviewing its local plan until the SDS has been adopted in 2029, there would be no new site allocations in place until 2032 at the earliest. While there is something of a mismatch between

the timing of the different types of plans, this is inevitable when a new tier of plan-making is established. However, as emphasised in the instructions from ministers highlighted above, government clearly does not want to see delays in reviewing local plans.

25. If the Government supports the establishment of a Norfolk and Suffolk Mayoral Combined Authority, the Norfolk Strategic Planning Group and Framework (NSPG/F) could play an important role in the early stages of assisting development of the SDS. The experience the Norfolk LPAs have of working together on the evidence base and reaching agreements on strategic issues should be extremely helpful.
26. The role of the district councils would be to work collaboratively with other Norfolk authorities, then with the mayoral authority in the development of the SDS. For Greater Norwich, the Mayoral Combined Authority Could be in place from May 2026 onwards. However, consideration is being given at an officer level as to whether early collaborative work could begin sooner, helping to inform and influence the development of the SDS. The early collaborative work on an SDS is likely to have significant overlaps with the work that would need to be carried out in the development of a new local plan.
27. The Government's intention is that SDSs will be in place by the end of this parliament in 2029. Consequently, preparatory work, potentially on elements of the evidence base which could be tied in with local plan evidence development, will be very likely to be required if this deadline is to be met.

## **Resources**

28. Thus, all the signs are that government expects us to work on both the SDS and local plan review simultaneously. National legislation and policy strongly suggest that the priority for the three districts needs to be GNLP review, but that we will also need to identify resource to contribute to the development of the SDS, as well as progressing other priority workstreams.
29. Given that GNLP review will still require cross boundary co-operation, possibly in relation to housing numbers, the role of the NSPG/F and development work on the SDS will play a major role in local plan review.

30. In addition, digitalisation will play a major role both in how plan-making is undertaken and in the nature of the resource required. Investment in “Plan Tech” would mean that the time taken for plan-making can be significantly reduced as many of its more labour-intensive elements such as undertaking site assessment and summarising consultation comments can be make greater use of digitalisation.
31. Despite the opportunities for the digitalisation of plan-making, the new plan-making timetables recently confirmed by government mean that planning policy resources will be stretched by the simultaneous:
  - i) need to review the local plan
  - ii) likely need to support SDS development
  - iii) existing commitments including the completion of the South Norfolk Village Clusters Housing Allocation Plan and the development of GNLP Supplementary Planning Documents (SPDs)
  - iv) ongoing monitoring and other planning policy commitments.

### Issues concerning local plan review

32. The division of additional housing resulting from the 2024 NPPF with our neighbouring districts before the SDS and any unitary authorities are in place could be complicated to address. However, local plan reviews and the development of the SDS would no doubt be an iterative process and evidence would be required which will inform both. A collaborative assessment of issues, challenges, constraints and opportunities would be an excellent first step. This should enable us to identify whether there is a need for redistribution of the recently increased housing numbers for local plan reviews and subsequently through the SDS.
33. Paragraph 22 of the NPPF requires local plans to look ahead a minimum of 15 years, and where larger-scale development is proposed such as a new settlement, the timescale should be 30 years or more. This is to take into account the likely timescale for delivery. Therefore, assuming a new local plan is adopted in 2029, it would set a legacy to at least 2044 and possibly as far ahead as 2059.
34. Even if the Government identifies a location for a new settlement/s in Greater Norwich in July 2025 following its New Towns Taskforce call for evidence in late 2024, it is likely that the local plan would need to incorporate such a long-term vision. The identification of one or more new settlements would also feature in the Norfolk and Suffolk SDS.



35. The strategic vision of a new local plan would likely have a two-pronged approach. Firstly, it would need to ensure a continuing supply of homes from a range of available sites. Secondly, it would need to consider how the potential delivery of new homes from one or more new settlements could come forward as quickly as supporting infrastructure allows.
36. Based on the Government's current policy, emphasis will continue to be on boosting the supply of new homes, plus considering other key land-use considerations. This includes employment, retail, leisure, and commercial development; infrastructure for transport, telecommunications, water, and energy generation; as well as community facilities like healthcare and education.
37. Writing a local plan gives councils the unique ability to shape land-use across administrative areas, which makes it one of the most influential documents councils prepare. A local plan influences government policy on matters like inward investment for jobs growth and infrastructure, locally it is the basis on which local communities can write a neighbourhood plan for their town or village, and on a day-to-day basis it guides every planning application that is determined.

### **Political Considerations**

38. Potential devolution to a County Combined Mayoral Authority and the LGR process concerning the establishment of unitary authorities have created uncertainty and led to some questioning of the need to continue with business as usual on local plan review, whilst at the same time supporting work on the likely requirement for a Norfolk and Suffolk SDS.
39. This mainly due to:
  - The removal of the protected 5-year housing land supply of 5.77 years through the adoption of the GNLP resulting from deletion of the former paragraph 76 of the NPPF. This has caused frustration as Greater Norwich currently cannot demonstrate a 5-year housing land supply.
  - Based on the LDSs' trajectories a GNLP review would not be adopted until late 2029. Following the LGR timetable none of the GNDP authorities will exist by that point and so questions have been asked as to why the existing LPAs should commit to the preparation of a new local plan given the cost and time take to produce local plans.

- The geographies of the new unitary councils are not yet known, so it will result in a local plan which may ultimately need to be adopted by more than one unitary authority. The recently submitted LDSs commit the districts to starting local plan preparation in October 2025, then undertaking Regulation 18 consultation in autumn 2026 and Regulation 19 draft plan publication in summer 2027. Plan submission is anticipated for summer 2028, with examination in autumn 2028 and adoption in March 2029. Depending on the complexity of the transition, it is anticipated that any unitary structures should become operational by April 2027 or April 2028. Given the expected timetable for local plan production, this means that a revised GNLP would almost certainly need to be adopted by a new unitary authority or authorities. Clarity has not yet been provided by government on transitional arrangements to ensure that work done by the districts on local plan review will be completed by the new authority or authorities. Such clarity is very likely to be provided in due course given the Government's clear steer that local plans should be reviewed and adopted as soon as possible to allocate sites for higher housing numbers. MHCLG will be asked for any confirmation they can provide on likely transitional arrangements. This work will be required whatever the boundaries are of a new unitary authority or authorities.
40. The above concerns are wholly understandable in a time of rapid and significant change for local government and plan-making. However, it is critical to note that if site allocations are not made until after SDS adoption, the earliest such allocations could be made locally to meet the Government's urgent aim to increase housing delivery nationally would be in 7 years' time in 2032. The result would very likely be 7 years during which a significant proportion of Greater Norwich's housing growth could be in unallocated locations, very possibly without adequate infrastructure provision.
41. The most significant legacy that the existing LPAs could provide for the future of Greater Norwich would be to update its local plan to provide greater assurance, stability and certainty for communities, businesses, and developers. This will help to secure future funding and allow growth to be planned with supporting infrastructure to meet our housing and jobs needs, whilst at the same time protecting and enhancing the special environment of our area.
42. As stated in paragraph 20, discussions are taking place with the MHCLG which may establish Greater Norwich's place in the phased rollout of local plans. A positive approach to GNLP Review from Broadland,

Norwich and South Norfolk seems likely to assist in accessing “tailored support” from government for plan-making.

## Conclusion

43. Taking account of the above, Appendix 1 sets out options and makes recommendations for future local plan making in Greater Norwich.
44. Whilst it is understandable that there is reticence from some in a time of change for local government about embarking on a new round of plan-making relatively soon after completing the 7-year process of taking the GNLP through to adoption, a number of factors as set out in the report and in Appendix 1 dictate that there is both a clear need and a statutory duty to update the local plan for Greater Norwich. Thus option 3, not producing a new local plan, has been discounted.
45. The options appraisal in Appendix 1 clearly shows that a joint review of the GNLP in line with the submitted LDSs (option 1), supported by investment in digitalisation, will be much the better option in comparison with producing separate local plans (option 2). Indeed, it is highly likely that the new timescales that have been established for plan-making by government mean that this is the **only** realistic option to meet the need for additional homes and jobs in a sustainable and timely manner and to continue the long-term effective strategic planning of Greater Norwich.

## Recommendations

That Broadland, Norwich and South Norfolk Councils be recommended to progress the review of the GNLP in line with the timetables already submitted to government in the Broadland, Norwich and South Norfolk Indicative Local Development Schemes.

That Broadland, Norwich and South Norfolk Councils be recommended to engage in collaborative work to inform and influence future production of a Spatial Development Strategy.

### Appendix 1 - Options for the next steps for local plans in Greater Norwich

Option	Benefits	Disadvantages	Recommendation
<b>1. Progress review of the GNLP in line with the timetables in the March 2025 Indicative LDSs</b>	<ul style="list-style-type: none"> <li>• Meets statutory duties and existing commitment through LDSs</li> <li>• Provides the quickest and least risky way to devise an updated growth strategy to include the additional 34% homes now required along with the necessary supporting Infrastructure</li> <li>• Provides the quickest and least risky way of addressing the current lack of a 5-year land supply</li> <li>• Provides the greatest certainty for investors and the public on site allocations</li> <li>• Increased digitalisation of the plan-making process across the 3 districts should reduce costs and speed up plan delivery in line with the 30-month period required under the new plan-making requirements</li> <li>• Overlap in evidence requirements for local plan review and the development of the forthcoming requirement for SDSs will allow synergies to be achieved and the processes to be iterative</li> <li>• The benefits of having an existing tried and tested NSPF allow for county wide Duty to Co-operate issues to be addressed</li> <li>• Provides the strongest opportunity for the current LPAs to guide the growth options and site allocations to address increased housing need, including the potential for a new settlement</li> </ul>	<ul style="list-style-type: none"> <li>• GNLP Review will have resource and cost implications, though these will be less than producing separate plans</li> <li>• There will be some complexity and resource implications in having broadly simultaneous processes of reviewing the GNLP whilst also developing the SDS</li> <li>• Changing responsibilities over plan development and adoption with devolution and local government reorganisation will add complexity to plan-making.</li> </ul>	<b>Recommended</b>

<p><b>2. Produce separate local plans for Broadland, Norwich and South Norfolk</b></p>	<ul style="list-style-type: none"> <li>• Meets statutory duties</li> <li>• Provides greater autonomy for each district</li> <li>• Allows for a co-ordinated strategic approach to be developed to include the additional 34% homes now required, albeit with greater complexity than option 1</li> <li>• Allows for a co-ordinated strategic approach to be developed addressing the current lack of a 5-year land supply, albeit with greater complexity than option 1</li> <li>• Provides some reassurance for investors and the public on site allocations</li> <li>• Provides a limited opportunity for the current LPAs to guide the growth options and site allocations to address increased housing need, including the potential for a new settlement</li> </ul>	<ul style="list-style-type: none"> <li>• Would require new LDSs to be submitted</li> <li>• Separate plan production would have the greatest resource and cost implications, with overall costs higher for each authority without the economies of scale resulting from joint working</li> <li>• Digitalisation of plan-making would be less cost effective if undertaken separately</li> <li>• There will be significant complexity in having broadly simultaneous process of producing separate local plans whilst also developing the SDS</li> <li>• Changing responsibilities over plan development and adoption with devolution and local government review will add complexity to plan-making</li> <li>• More limited effective co-ordination, though some co-operation will still be required as the Duty to Co-operate continues to apply and cross boundary issues such as housing numbers, environmental protection and enhancement and economic issues</li> <li>• Less likely than option 1 to be delivered to required new local plan timescales thus risking a longer period without a 5-year land supply</li> <li>• Does not support a joint approach to planning for the local Functional Economic and Housing Market Areas</li> </ul>	<p><b>Not recommended</b></p>
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		<ul style="list-style-type: none"> <li>• Greater Norwich will be less attractive to investors and government funding without a clear joint approach</li> <li>• Does not tie in with government assumption as set out in the new housing numbers in the NPPF that the LPAs will continue to work together</li> <li>• Potentially less likely to benefit from government plan-making support</li> <li>• The many years long commitment to joint working would require significant and costly unravelling.</li> </ul>	
<b>3. Rely on the March 2024 adopted GNLP and do not produce a new local plan</b>	<ul style="list-style-type: none"> <li>• Possibly the lowest-cost option (depending on whether there is government intervention and/or the need to fight appeals on any refused applications subject to the absence of a 5-year land supply)</li> <li>• Avoids revisiting the potentially resource intensive process of plan-making so soon after adoption of the GNLP.</li> </ul>	<ul style="list-style-type: none"> <li>• There will be no up-to-date local plan to provide the strategy to guide the location and quality of housing development and to attract investment until 2032 at the earliest</li> <li>• This option will be the most likely to perpetuate the lack of a 5-year local plan until at least 2032</li> <li>• The option does not meet legislative requirements, therefore has a high risk of government intervention with an accompanying reduction in local decision-making powers along with increased costs</li> <li>• There is a very real risk that infrastructure will not be provided to support growth</li> <li>• There is a high reputational risk resulting from having to approve or fight appeals on potentially poor-quality planning applications.</li> </ul>	<b>Not recommended</b>