

Report to	Sustainable Development Panel 15 January 2020	Item
Report of	Director of place	4
Subject	Greater Norwich Local Plan: regulation 18 draft plan consultation	

Purpose

This report updates members on progress being made with Greater Norwich Local Plan, and seeks comments on the draft plan's content.

Recommendation

To consider the content of the draft Regulation 18 Greater Norwich Local Plan in advance of consideration cabinet on 15 January 2020

Corporate and service priorities

The report helps to meet the corporate priorities: great neighbourhoods, housing and environment; inclusive economy; and people living well.

Financial implications

The council's contribution towards the cost of producing the plan is expected to be met from existing budgets.

Ward/s: All Wards

Cabinet member: Councillor Stonard – Sustainable and inclusive growth

Contact officers

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Background documents

None

Report

1. The Greater Norwich Local Plan (GNLP) has been in preparation since 2016 and has undergone several stages of consultation (see paragraph 8 below). A full draft plan is now nearing its consultation stage.
2. The Greater Norwich Development Partnership (GNDP) endorsed the draft Regulation 18 GNLP for public consultation at its meeting on 6 January. Following endorsement by the three local planning authorities, consultation will take place the draft Regulation 18 plan, commencing on 29 January until 16 March 2020.
3. The draft GNLP comprises:
 - (a) a strategy document which contains the planning strategy for growth in Greater Norwich from 2019 to 2036, including thematic policies, and
 - (b) a site allocations document containing sites proposed to be allocated for development to help implement the growth strategy, containing site specific policies for all sites other than the village clusters in South Norfolk.(A separate allocations plan is being developed by South Norfolk council for these village cluster sites, which will come forward in due course.)
4. Once adopted the GNLP will supersede the Joint Core Strategy for Broadland, Norwich and South Norfolk, and the site allocations plans for the Norwich and Broadland and part of South Norfolk District.
5. The purpose of this report to sustainable development panel is to give members an opportunity to comment on the draft plan. Comments made will be provided to Cabinet meeting later the same day, 15th January.
6. The GNDP meeting papers for 6 January are available at this link: <http://greaternorwichlocalplan.org.uk/>. In addition to the draft plan documents they include a covering report, draft communications plan, and a revised timetable.
7. The strategy document is attached at Appendix 1 to this report; a list of the preferred sites for Norwich is attached at Appendix 2; and a list of other sites carried forward from the current Site Allocations Plan into the GNLP is attached at Appendix 3.
8. The key stages of plan preparation to date are as follows:

Call for Sites	May-July 2016
Regulation 18 Growth Options and Site Proposals Consultation	January-March 2018
Regulation 18 Consultation on New, Revised and Small Sites	October-December 2018

9. Cabinet has previously considered the emerging Greater Norwich Local Plan, most recently at meetings in December 2017 in relation to the consultation on the Growth Options document and in October 2018 in relation to the consultation on new and amended sites.
10. Despite the progress made to date on the GNLP, the process of working in partnership with the other Greater Norwich local authorities has experienced difficulties, particularly in relation to detailed member involvement in the process and to the challenges of working with other local authorities which have their own ways of working. These challenges have already had implications for the timetable, which has been extended several times: the current timetable shows an anticipated adoption date of August/ September 2022. The governance arrangements for the Greater Norwich Development Partnership allow for each of the three councils to have a veto in relation to decision-making.

Content of the draft Regulation 18 plan

11. The GNLP papers provide an overview of the content of the draft plan proposed for consultation. In summary, the strategy document:
 - a. Identifies where growth needed to 2038 should be delivered, building on the established approach to include brownfield sites in Norwich (including within a newly defined East Norwich Strategic Regeneration Area), the major urban extension to its north-east, and expanded strategic employment sites such as Norwich Research Park. It also includes growth at most towns and larger villages, as well as sites in village clusters;
 - b. Provides for around 44,500 new homes and 360 hectares of additional employment land from 2018 to 2016. 69% of this growth is focused in the Norwich urban area, 14% in main towns¹, 8% in key service centres², and 9% in village clusters;
 - c. Allocates a 9% buffer above local housing need to ensure housing delivery and does not include windfall development in the calculations;
 - d. Sets a general requirement for on-site provision of affordable housing of 33%, with a lower provision of 28% on centrally located brownfield sites, on the basis of viability evidence;
 - e. Promotes energy and water efficiency, and provision of green infrastructure and biodiversity net gain;
 - f. Aims to promote modal shift in transport use and encouragement of higher density development in urban areas;

¹ Aylsham, Diss, Long Stratton, Harleston and Wymondham

² Acle, Blofield, Brundall, Hethersett, Hingham, Loddon/Chedgrave, Poringland/Framingham Earl, Reepham and Wroxham

- g. Sets out a vision for Norwich city centre to ensure that it remains the focus for high-value jobs, services and facilities and a key driver for the area's economy; and
 - h. Clarifies that Norwich's net deliverable housing commitment (consisting of carried forward allocations and extant planning consents, including student accommodation) is 7,087 homes, and that approximately an additional 2,500 new homes can be accommodated in new housing allocations in Norwich, arriving at a total of approximately **9,500 homes** to be delivered in Norwich to 2038.
12. The draft GNLP Sites document proposes 17 preferred sites for housing development in Norwich, in addition to 30 sites carried forward from the Norwich Site Allocations and Site Specific Policies Plan. The preferred sites include the Carrow Works site, which presents a major development opportunity, particularly in conjunction with the Deal Ground and Utilities sites.
13. In the wider Norwich urban area fringe parishes, preferred sites include Land off Blue Boar Lane / Salhouse Road (1,200 homes), and Land between Fir Covert Road and Reepham Road in Taverham (1,400 homes). In addition, Lodge Farm Costessey is identified as a contingency site for 1,000 homes if required.
14. As noted above approximately 9% of growth to 2038 is anticipated to be delivered in village clusters in South Norfolk and Broadland. The rationale for this approach is that it can support social sustainability in rural areas and provide more choice to aid housing delivery. The report acknowledges that this is a novel approach, which will be tested at public examination. Site selection of appropriate village cluster allocations has been limited to those with good access to a primary school and a 'safe route to school'.
15. The draft GNLP Sites document excludes preferred site allocations for smaller villages in South Norfolk. The rationale for this approach is set out in paragraphs 1.4-1.7 of the report to GNDP (Approval for draft Greater Norwich Local Plan (Regulation 18) consultation). This states that South Norfolk is the most rural of the authorities, and that southern parts of the district rely on centres other than Norwich for access to some services and jobs. On this basis, a bespoke approach to village clusters in South Norfolk will be developed by South Norfolk Council. This 'village clusters plan' will plan for a minimum of 1,200 additional homes on top of the 1,349 existing commitment in South Norfolk, and will be progressed as quickly as possible.

Council comments

16. The council has commented on the emerging strategy at key stages in its development. The Cabinet report in December 2017 set out a number of concerns on the emerging Growth Options document, prior to consultation which took place between January and March 2018. These include: concerns about the overall scale of growth proposed and whether it is sufficiently ambitious; concern at the proposed distribution options including the potential impact of a rural dispersal approach; the need for a clear focus

in the plan on how it would address the growth needs of Norwich as a vibrant and dynamic city; lack of detail about delivery; and concern at the time taken to produce the document, and the implications of detailed member involvement.

17. Some of these concerns have been addressed in the final draft of the strategy proposed for consultation. For example:
- Norwich's role, and that of the city centre, to support the delivery of housing and other development across the plan area is acknowledged in a number of locations across the document. This is most notable in Policy 7.1 (the Norwich urban area) which includes a section on the city centre, highlighting its strategic role as a key driver for the Greater Norwich economy, promotes the comprehensive redevelopment of the Anglia Square site for high density, housing led mixed use development, and identifies an East Norwich strategic regeneration area as noted above in paragraph 11a. The policy also includes reference to the loss of employment floorspace in the city centre, which is important as part of the policy justification for potential use of Article 4 Directions to control changes of use to residential.
 - The plan provides greater detail about delivery in a Delivery Statement and in policy 2 (Sustainable Communities), and refers to potential use of legal powers to assist delivery, including compulsory purchase.
18. There are however a number of outstanding concerns, some of which may raise issues of soundness at public examination. Given that the plan is at consultation stage and therefore is not the final document, there is potential for amendment to address these issues before the Regulation 19 stage.

Overall scale of growth and ambition

19. The housing requirement figure set out in Policy 1 (Sustainable Growth Strategy) is approximately 44,500 new homes to 2038, which allows a 9% buffer above local housing need (LHN) to cater for non-delivery of sites, and equates to an annual delivery target of approximately 2,220 homes.
20. The 9% buffer is considered low given historic levels of under-delivery. The 2017-18 Greater Norwich Annual Monitoring Report, which was reported to Sustainable Development Panel in September 2019, shows that housing delivery for Greater Norwich over the Joint Core Strategy (JCS) plan period to date is well below target. The annual JCS delivery target for Greater Norwich over the period 2008-26 is 2,046 homes per annum whereas annual average delivery over the same period is approximately 1,550 homes.
21. The GNLP housing requirement figure Planning Practice Guidance (PPG) states that the LHN provides a minimum starting point in determining the number of homes needed in an area (PPG para 010) and that there will be circumstances where it is appropriate to consider a higher figure. Such circumstances include where increases in housing need are likely to exceed

past trends because of growth strategies for the area that are likely to be deliverable, including where funding is in place to promote and facilitate additional growth such as Housing Deals. The Greater Norwich authorities and partners signed a City Deal in 2013, which included agreement to deliver an extra 3,000 homes on top of the housing growth envisaged in the JCS to 2026. The GNLP refers to the City Deal at paragraph 162 of the Strategy document, but does not make clear how the proposed scale of growth addresses it effectively which is particularly pertinent given the level of growth proposed in the rural area.

22. Although the annual average GNLP housing delivery target of around 2,220 homes is higher than the JCS annual average target of 2,046, these figures cannot be compared on a like-for-like basis. The GNLP housing requirement is based on local housing need calculated using the Government's standard methodology and includes provision for purpose built student accommodation and institutional development, whereas the JCS housing requirement does not include those elements. The level of growth proposed in the GNLP is considered insufficient to address the growth needs of Greater Norwich as a whole and the Norwich Urban Area in particular, and lacks the ambition expressed through the previous Joint Core Strategy and the Greater Norwich City Deal.

Distribution of development

23. As noted above, 9% of total housing growth over the plan period is planned to be located in village clusters. Despite the fact that the strategy document in policy 7.1 proposes that the primary focus of planned development is the Norwich urban area, it also supports a level of growth in rural areas which is very hard to reconcile with the climate change agenda and the need to reduce carbon emissions, and will have impacts for infrastructure provision. This approach is considered to be inconsistent with the greater emphasis expressed within the document on addressing climate change and significantly reducing carbon emissions, for example in the Vision and Objectives and Climate Change statement, and may undermine the ability of the plan to deliver sustainable growth.

Separate village clusters plan

24. The rationale provided in the Strategy document (at paragraph 25), and in the covering report to the GNDP referred to above, to justify development of a bespoke plan for village clusters in South Norfolk appears weak. It is understood that this is based on the desire for further consideration of site selection before publication of the plan for this area. Legal advice will be sought by the Greater Norwich Development Partnership on the robustness of this approach. The exclusion of the rural parts of South Norfolk from the GNLP, if not clearly and explicitly justified in planning terms, may leave the GNLP vulnerable to challenge on soundness grounds at the public examination stage.

Transport policy

25. Policy 4 (Strategic Infrastructure) is considered to be insufficiently ambitious in supporting the transition to a low carbon future by achieving significant modal shift. Although the policy makes reference to the importance of achieving modal shift, it does not fully recognise the need to integrate transport and land use policies, and there is no mention of mobility hubs as part of a sustainable transport network (as currently being developed through the Transforming Cities programme).

Climate change

26. The strategy document makes a number of positive statements about the importance of tackling climate change, including in section 3 (Vision and Objectives) and section 4 (the Climate Change Statement). However the lack of ambition on transport issues and the focus on significant development in rural villages is inconsistent with the statements within the plan on addressing climate change, for example that the plan is “seizing opportunities to promote low carbon development and address climate change” (para 140 of the strategy document).

Conclusions

27. The draft GNLP Strategy document addresses some of the issues raised by the council during its development as noted above. However, a number of outstanding issues remain, including the emphasis on rural dispersal /village clusters and transportation concerns. There is a disconnect between the vision, objectives and climate change statement and the actual policy substance needed to enable the plan to contribute significantly to delivery of a low carbon future.
28. There is scope for the weaknesses identified above to be addressed through consultation and amendment, before formal submission to the Secretary of State or through the public examination process. Therefore, despite the concerns noted in this report, the recommendation to Cabinet is to endorse the publication of the draft GNLP documents for the Regulation 18 consultation, subject to any comments made by this Panel.