

Report to Cabinet
20 January 2021
Report of Director of Place
Subject Greater Norwich Local Plan – Regulation 19 consultation
draft

Item

7

Purpose

To consider an update on the draft Regulation 19 Greater Norwich Local Plan (GNLP) due to be published for consultation in February 2021.

Recommendation

To approve the draft Regulation 19 Greater Norwich Local Plan for consultation on soundness and legal compliance in February and March 2021.

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

There are no direct financial implications arising directly from this report. 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

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Background documents

None

Report

Introduction

1. The Greater Norwich Local Plan (GNLP) has been in preparation since 2016 and is now nearing its final stages. This report provides an overview of progress to date and seeks approval to publish the plan for consultation on its soundness and legal compliance between 1st February and 15th March 2021.
2. The Greater Norwich Development Partnership (GNDP) oversees the preparation of the GNLP. The GNDP is an informal, non-decision making partnership comprising the city, South Norfolk and Broadland councils, the county council and the Broads Authority.
3. At its meeting on 7th December the GNDP agreed to recommend to the Greater Norwich councils that they publish the Regulation 19 Pre-submission Draft GNLP Strategy document for consultation on soundness and legal compliance. Subsequently, at its meeting on 16th December, the GNDP agreed to recommend to the councils that they approve the Regulation 19 Sites document for consultation. Both meetings also agreed delegated authority to relevant directors to make further changes to the plan documents prior to them being reported to cabinets of the Greater Norwich councils.
4. Members of Sustainable Development Panel considered and commented on an earlier version of the draft strategy document at a meeting on 3rd December and subsequently had the opportunity to comment on the draft Sites document. This informed discussion at the GNDP Board meetings in December.
5. This is the pre-Submission, or Publication, stage of local plan making. The consultation will seek representations on whether the plan is legally compliant and sound. To be legally compliant the plan must be:
 - a) Prepared in accordance with the councils' Local Development Schemes (LDSs)
 - b) Consultation carried out in accordance with the councils' Statements of Community Involvement (SCIs)
 - c) Accompanied by a Sustainability appraisal and Habitats Regulations Assessment
 - d) The councils should have worked collaboratively with neighbouring authorities under the Duty to Cooperate, and
 - e) The plan should comply with all relevant legislation.
6. To meet the tests of soundness in the National Planning Policy Framework (NPPF), the plan must be:
 - a) Positively prepared – the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements
 - b) Justified – the plan should be the most appropriate strategy taking into account reasonable alternatives and based on proportionate evidence

- c) Effective – the plan should be deliverable over the plan period and based on effective joint working on cross boundary strategic priorities; and
 - d) Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the NPPF.
7. Following the Regulation 19 consultation it is anticipated that the plan will be submitted to the Secretary of State in July which will trigger a public examination to take place towards the end of 2021.
 8. 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. Norwich’s Development Management Policies Plan will not however be superseded by the GNLP.

Background

9. The Regulation 19 GNLP comprises:
 - (a) a strategy document which contains the planning strategy for growth in Greater Norwich from 2019 to 2038, 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.)
10. The GNLP has undergone several stages of consultation since its commencement in 2016, and reports have been provided to both sustainable development panel and cabinet throughout this period. The most recent consultation document - the draft Regulation 18 plan - was discussed at sustainable development panel and subsequently approved for consultation by cabinet, both meetings taking place on 15 January 2020. The cabinet report is available [here](#). Following endorsement by the other two Greater Norwich planning authorities, the plan was published for consultation from 29 January until 16 March 2020. However, in approving the document for consultation Cabinet noted that a number of aspects of the plan should be improved prior to submission of the plan. In summary these aspects were:
 - (a) Inadequate overall scale of growth proposed and overall ambition for growth in the light of the Greater Norwich City Deal;
 - (b) Too great a proportion of development being proposed in village locations which is hard to reconcile with climate change objectives;
 - (c) The rationale for a separate village clusters plan in South Norfolk being weak;
 - (d) Policy for strategic infrastructure considered to be insufficiently ambitious in supporting the transition to a low carbon future by achieving significant modal shift; and

(e) 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.

11. In July 2020 a report to [SD Panel](#) provided feedback on the public consultation in early 2020 and sought agreement to a revised timescale to allow additional time to make updates in relation to large volume of representations, take updated evidence on board, hold an additional, Regulation 18(d) consultation in the autumn, and help address the impacts of COVID19 on plan preparation.
12. The publication of the Planning White Paper in August 2020 has had serious implications on the timescale for progressing the GNLP. The council's response to the Planning White Paper, and the related technical consultation 'Changes to the Current Planning System', were set out in reports to both [SD Panel](#) and [Cabinet](#) in October.
13. In summary the proposed changes to the standard method for assessing housing need at that time significantly increased the housing need for Greater Norwich. The revised methodology, if implemented as proposed, would have required the number of new allocations in Greater Norwich to be increased from almost 8,000 to well in excess of 30,000. Following consideration of options by the [GNLP Board](#) on 30 September, the Board took the decision to accelerate plan production making use of the transitional arrangements provided by the government, based on the draft GNLP already consulted upon.
14. This has resulted in a revised timetable which is summarised below:

Revised timetable September 2020	
Cabinets agree Reg. 19 plan	Mid-January 2021
Reg. 19 publication for soundness and legal compliance	1 February – 15 March 2021
Submission of the GNLP to the Secretary of State	July 2021
Public Examination	Nov/Dec 2021
Consultation on proposed main modifications	Mar/Apr 22
Publication of Inspector's report	July 22
Adoption of the Greater Norwich Local Plan	September 22

15. It should be noted that on 16th December the government published its response to the recent consultation on the standard methodology for assessing housing need. The government is to retain its existing standard method for calculating housing need, including its reliance on the 2014-based household projections, but has announced that it will add a new 'cities and urban centres uplift' of 35% for England's 20 biggest cities and towns. This does not include the Norwich urban area which is around the 30th largest. The level of housing proposed in the plan is therefore in accordance with the existing standard method with a significant buffer over local housing need (discussed further below). Although the plan no longer needs to proceed through transitional arrangements under the revised policy, the Greater Norwich authorities have agreed to proceed to current timescales in order to avoid any further delay in the plan's production and to ensure that plan-making momentum is maintained.
16. Under the Planning White Paper proposals, new plans will be rolled forward every 5 years, so although this GNLP will have an end-date of 2038 it is expected that work will commence soon after adoption on the next iteration of the plan.
17. As noted above the timescale for production of the plan has been accelerated which has meant that the Regulation 19 plan documents have had to be developed at pace over the period since September. This has been challenging to both the GNLP team and the council's officers who have had to respond to, and inform, revised policy content.

The Regulation 19 Draft Pre-submission Strategy document

18. Given the potential for further updates to the Regulation 19 Strategy document prior to cabinet, rather than appending a version to this report, members can view the most up to date version [here](#) (version 1.7) on the GNLP webpage. (This also includes the Sites documentation discussed below, and the evidence base.) Please note that version 1.7 includes changes made to the plan since the GNDP meetings in December, which have been signed off by the relevant directors of the Greater Norwich councils. The schedule of changes is also on the website.
19. The report to GNDP on 7th December notes that the great majority of the work on the strategy document has been completed but acknowledges that there is still a need to complete some aspects of the evidence base; some elements of this will be developed further ahead of submission of the plan in summer 2021. This is discussed further at paragraphs 37 to 39 below.
20. Officers consider that significant progress has been made to the Strategy document since the Regulation 18c plan considered by cabinet in early 2020. Many of the areas of concern previously raised by cabinet (see paragraph 9) have been addressed.
21. A high level summary of the substantive changes from the Regulation 18c to Regulation 19 GNLP Strategy document is appended at Appendix 1. This is included to provide an overview of change; however it is an extract from the GNDP report of 7th December so does not include further changes agreed since then. Please note that the detailed table of officer responses to all

consultation representations is not available at the time of writing but will be published on the GNLP webpage by the time of this cabinet meeting.

22. One of the key changes between the Regulation 18c and 19 draft plans is that overall housing numbers in Policy 1 (the Growth Strategy) have been increased by just over 5,000 homes. The GNLP report notes that, while that strategy continues to address local housing need using the 2014-based projects as required by the Government's existing standard methodology for assessing housing need, it also recognises that the 2018 projections for Greater Norwich indicate that household growth may be higher.
23. The 5,000 increase comprises 2,000 additional homes in East Norwich, 840 homes in urban fringe locations (Colney and Cringleford) plus Harleston, Wymondham, Aylsham and Acle, 800 additional homes in villages, and inclusion of a 1,360 windfall allowance.
24. The increase in housing numbers (to 49,492) results in a significant buffer of 22% over local housing need (40,541) and addresses the council's previous concern at the then inadequate overall scale of growth in the Regulation 18 plan and the need to deliver the additional housing signed up to in the Greater Norwich City Deal. This scale of buffer also makes it much more likely that Greater Norwich authorities can deliver the housing that people need. It enables higher levels of growth, responding to the 2018-based projections, and will support the plan's efforts to boost economic development.
25. Other changes to the strategy document include the following (not an exhaustive list):
 - a) substantial amendments to Policy 3 (Built and Historic Environment) to reflect consultee concerns such as introducing a policy requirement to undertake Heritage Impact Assessments where required, and setting out a requirement for 10% biodiversity net gain, reflecting the passage of the Environment Bill through parliament.
 - b) updates to Policy 4 (Strategic Infrastructure) including deletion of the reference to the cross-valley link (linking UEA to the hospital) as no deliverable scheme has been identified. Members may wish to note that this policy retains reference to the Norwich Western Link (NWL). However, the plan doesn't seek to allocate the land for the road scheme and instead refers to emerging scheme as part of the Transport for Norwich Strategy. Work on the Transport for Norwich Strategy is continuing and it is expected that the City Council will be in a position to make a decision on whether to support the Strategy over the summer in advance of the submission of the formal application for the NWL.
 - c) updates to Policy 5 (Homes) include clarification in relation to its affordable housing requirement. The change allows for a different affordable housing requirement on centrally located brownfield sites (the policy requirement is either 33% or 28% in Norwich city centre) where the applicant can demonstrate that particular circumstances justify the need for a viability assessment at decision making stage. This reflects the council's concerns at the fact that many brownfield sites in Norwich are of marginal viability.

- d) updates to Policy 6 (the Economy) including to its supporting text to reference new evidence in the Employment, Town Centre and Retail study addendum (Avison Young, 2020). This includes justification for allocating significantly more employment land than required for jobs growth (of around 33,000 jobs in the period 2020 to 2038). For example this references that a significant proportion of supply is on key strategic sites including the airport area, and notes that the scale and range of employment allocations provide for choice and flexibility and will allow for growth in the longer term.
- e) updates to policy 7.1 (Norwich urban area) include clarification and additional wording relating to East Norwich Strategic Regeneration Area to ensure consistency with the emerging masterplan objectives and with the wording of the allocation in the Sites plan. It also includes additional text to clarify that a new partnership has been created to drive forward the East Norwich masterplan with involvement from public and private sector partners including Homes England, Network Rail and the landowners, and the fact that funding is available to progress the masterplan.

26. Whilst it is acknowledged that much progress has been made, the speed at which the Regulation 19 Strategy document has been produced means that not all the areas of concern noted in the previous cabinet report have been fully resolved. We would not wish to hold up the forthcoming consultation on the plan; the policy content is considered to be sufficiently well developed to go forward to consultation, and in addition it is essential to keep the momentum going to ensure its eventual adoption to the proposed timetable. However there are several areas within the Strategy document where officers consider it could be further improved in due course:

- a) The increased scope for small housing developments in village locations in policy 7.5 (noted in paragraph 23 above) will result in greater rural dispersal and is inconsistent with the plan's objectives for addressing climate change. Policy 7.5 allows for windfall development of up to 5 homes on small sites in the plan period in 'larger' parishes and up to 3 homes in 'smaller' parishes (the parishes in the 2 categories are listed in a new appendix 7). This change is intended to reflect the greater range of services available in larger parishes, support village life, and allow more opportunities for small-scale builders. However the policy will result in yet more housing in village locations which is hard to reconcile with statements in the plan on addressing climate change and will not support the transition to a low carbon future by achieving significant modal shift. In addition the way the policy is drafted limits the number of homes on small scale windfall sites to either 3 or 5 dwellings adjacent to villages, which does not allow for windfall development opportunities which may arise within villages which is likely to more sustainably located in relation to existing services.
- b) A new policy 7.6 is included with the intention of 'preparing the way' for a new settlement or settlements to be included in the next local plan. No new settlement is proposed in this GNLP but the strategy notes that, with sustainable options for settlement extensions diminishing, one or more new settlements are likely to be required in the longer term. Although the use of positive language about new settlements is acceptable in principle, we regard the inclusion of a policy in this plan as unnecessary at this stage,

and there is a risk that the policy may be removed by the inspector at the examination.

The Regulation 19 Draft Pre-submission Sites document

27. The second part to the regulation 19 consultation is the site allocations document which contains the sites that are proposed to be allocated for development to help implement the growth strategy. There are eight chapters to the site allocations plan and these contain the 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.

28. The eight chapters are as follows:

- 1) Site allocations introductory chapter
- 2) Norwich
- 3) Urban-Fringe
- 4) Main Towns
- 5) Key Service Centres
- 6) Broadland Villages
- 7) South Norfolk Villages Non-residential Sites
- 8) Costessey Contingency Policy

29. The Sites document identifies and allocates strategic housing and mixed-use sites as well as strategic sites for employment. Other allocations provide housing sites and sites for other uses including employment, recreation, open space and community uses to meet the strategic needs set out in the GNLP strategy, without being strategic in themselves. The sites allocations all contain a map, the site policy and background information.

30. The list of sites proposed to be allocated for Norwich are set out in Appendix 2.

31. Some of the sites listed are new allocations but many have been carried forward from the existing site allocations document as they have not yet been delivered. They are proposed to be allocated on the basis of evidence provided by landowners and developers that they will come forward during the next plan period or they already benefit from planning permission.

32. In terms of housing numbers, the total commitment for Norwich is equivalent to 11,666 homes. 1,885 homes have already been delivered between the base date of 1st April 2018 to 31st March 2020. 5,254 new homes could potentially be built on sites with unimplemented planning permissions and allocations in existing local plans (as at 1st April 2020). There are new allocations and uplift on existing allocations providing for 4,527 new homes.

33. It should be noted that the policies do not make reference to affordable housing as the policy for affordable housing is set out within policy 5 of the strategy document. The expectation would be that the sites would need to accord with policy 5 and therefore most sites in the Greater Norwich areas would be expected to provide at least 33% affordable housing, except in Norwich City Centre where the requirement is at least 28%. On brownfield sites where

developers can demonstrate that there are particular circumstances, the policy allows for viability testing at the decision making stage.

34. Several of the allocations, particularly within the city centre are for mixed use development (including elements of residential, employment, retail, leisure, educational and cultural facilities). The plan proposes a limited number of allocations for employment use and other uses; this includes sites providing for the longer-term expansion of the University of East Anglia. Land is also allocated for aviation related uses at the airport.
35. The Sites document has been prepared by the GNLP team, however Norwich City Council's planning officers have reviewed and significantly inputted into the policy content for Norwich, particularly with regards to the new policies. One area where significant changes were made were the combining of three separate site allocation policies (Deal Ground, Utilities Site and Colman's site) into one site allocation in order to reflect the coordinated approach that will be required through the masterplanning process and to ensure consistency of approach across the three sites. The proposed policy for the redevelopment of Anglia Square has been amended in the light of the recent decision of the Secretary of State notwithstanding the fact that this is currently subject to legal challenge by a third party.
36. Whilst content with the Norwich site allocation policies, there are some outstanding concerns regarding sites outside the city boundary at Costessey:
 - a) The Sites plan includes a new contingency site at Costessey (GNLP0581/2043: Land off Bawburgh Lane, north of New Road and east of the A47, Costessey) for in the region of 800 homes. This is well-related to the built-up areas of Bowthorpe and Costessey with no major constraints. The City Council has a land ownership interest in this site which is considered as suitable for allocation as many other sites in the plan. The policy triggers for releasing the site for development do not appear to make sense. The policy states that the site will become an allocation if there are three consecutive years in Annual Monitoring Reports (AMRs) where housing completions are more than 15% below target and where under-delivery is the result of site specific constraints preventing delivery of committed/ allocated sites. The reference to three consecutive years is an area of concern: there may be significant under-delivery but not in three consecutive years, resulting in inability to release this site even when needed to boost delivery to meet targets. The reference in the policy to assessing where under-delivery is related to constraints on particular sites is also a concern, as it is not clear how our approach to monitoring housing delivery will provide this information.
 - b) A site allocation is included for the Royal Norfolk Showground, Costessey (policy COS 5/GNLP2074). This alters the existing policy to permit small food, dining and leisure led development, with the rationale that this will support the Showground's role as a major visitor attraction and events location, and to help meet the needs of local residents in the immediate area. The city council view is that Costessey is a functional suburb of Norwich, with four distinct parts, Old Costessey, New Costessey, Queens Hills and new development south of Dereham Road. If there are insufficient services provided to meet the needs of the settlements, provision needs to

be made within each of these areas, which is already allowed for in GNLP policy, rather than on the other side of the A47. Although there may be some potential for growth at the Showground, this should only be for uses that require a rural location (eg recreational, tourism, leisure) and support the current function of the Showground. The policy as currently worded is likely to result in development of cafes/restaurants/pubs/shops and encourage increased car usage to access the site, potentially attracting more than local traffic. The policy as proposed is considered to run counter to the plan's objectives in relation to addressing climate change, and will not support the transition to a low carbon future by achieving significant modal shift.

Evidence base

37. An extensive range of evidence has been developed to inform the policies in the draft Regulation 19 GNLP. A consequence of the shortened timetable for producing the plan has been the challenge of updating the relevant studies that comprise the evidence base.
38. Two key supporting documents have to be produced with the local plan – a Sustainability Appraisal (that assesses potential social, economic and environmental impacts) and Habitat Regulations Assessment (on potential impacts on European wildlife sites). These are progressed in tandem with the local plan and are used to inform decisions on the local plan and whether it is appropriate, and as such are key components of the plan's evidence base. Although not fully complete these key documents are now available in draft on the GNLP website (at the same link as the other GNLP documentation). An Equalities Impact Assessment has also been produced and is now on the website. This is required under the Equality Act 2010 to ensure that plans and policies do not adversely impact upon any group with 'protected characteristics'. Work on other evidence documents, including a Water Cycle Study, Viability Assessment and Strategic Flood Risk Assessment) is also progressing. The majority of the evidence base should be signed off prior to cabinet.
39. Given the challenges of the timescales, and the fact that some studies are not yet complete, there is some concern that not all policy in the Regulation 19 draft plan is currently informed by up to date and robust evidence. However it is intended that evidence will be updated by the time of this Cabinet meeting where possible, and by Submission at latest, to enable the full range of submission documentation and evidence studies to be submitted to the Planning Inspectorate in summer 2021.

Conclusions

40. As noted above significant progress has been made on the preparation of the Draft Regulation 19 GNLP, both for the Strategy and Sites documents. Although the city council considers the plan to be sound overall, this report identifies a number of areas of concern in paragraphs 26 and 36 above, and in relation to the need for a robust and up-to-date evidence base.
41. It is essential however that momentum is maintained to enable the plan to be submitted and to undergo public examination in line with the agreed timetable,

therefore the recommendation to Cabinet is to approve the plan for soundness consultation in February – March.

42. The city council would have no objection to changes being made to the plan to address these areas of concern and further strengthen the plan's soundness, either as a result of the forthcoming consultation process or through the public examination process.

43. It should be noted that the plan also needs to be approved for consultation by the cabinets of South Norfolk and Broadland councils, meeting on 11 and 12 January respectively, before the soundness consultation can proceed. A verbal update will be provided at cabinet of the outcome of these meetings.

Summary of substantive changes from the Regulation 18C to the Regulation 19 GNL Strategy (at 7 December 2020)

Chapter/Policy	Summary of Changes	Reason for Changes
Introductory Sections		
Foreword	Changes to be agreed with the chair on agreement of the Reg. 19 document.	To provide an update so that the text is suitable for the submission document.
1. Introduction	Clarification of the plan being produced under the Government's transitional arrangements, the role of the strategy and which policies are strategic. Revised text emphasises that the GNL provides continuity and an excellent basis for the new planning system promoted through "Planning for the Future".	To reflect changes that will result from "Planning for the Future", including the GNL providing the strategic context for other plans.
	Updated references to the proposed ban on the sale of new petrol and diesel cars now starting in 2030.	In response to consultation comments and government announcements.
2. Greater Norwich Profile	Clarification of the role of the spatial portrait in identifying the current situation and key issues locally rather than setting policy. Clarifications to the text and various updates to data and maps.	In response to comments from a number of consultees, largely on factual issues, including Natural England, Historic England and the Environment Agency.
3. Vision and Objectives	Changed to increase the emphasis on: <ul style="list-style-type: none"> 1. enhancing the environment, water quality and biodiversity net gain; 2. local character and high-quality design; 3. access to employment; 4. reducing health inequalities, use of new technologies to access 	In response to comments from a number of consultees including Natural England, Historic England, the Environment Agency, the Highways Agency, Active Norfolk and the Town and Country Planning Association (TCPA).

	<p>health care, promoting healthy lifestyles/active travel and reducing the need to travel;</p> <ol style="list-style-type: none"> 5. housing affordability; 6. the potential for economic change in Greater Norwich to assist the shift to a post-carbon economy and on increased productivity; 7. the role of the agri-tech and research sectors in living with environmental change and ensuring food security and 8. the increased role of home and remote working. 	Changes also reflect current and emerging economic changes and the publication of the draft Local Industrial Strategy.
4. Delivery and Climate Change Statements	Limited updates to the Delivery Statement to reflect the likely replacement of CIL by the Infrastructure Levy.	General support through the consultation for the comprehensive approach taken in the plan on these two key issues and the clear way the statements set out that approach.
	Continued use of nationally produced district wide data for carbon emissions and the link to national carbon reduction targets in plan will be retained (some consultees had suggested having local monitoring and targets).	No change to the monitoring for climate change as it is neither possible nor desirable to set up plan specific monitoring. Contributing to lowering emissions to help meet targets nationally reflects the role local plans can play among many other plans and initiatives in tackling climate change.
The Strategy		
Policy 1 The Growth Strategy	Explanation included on the use of transitional arrangements to determine the housing numbers for this plan.	To clarify how the plan is being taken forward under the changes introduced by the supporting documents for “Planning for the Future”.

	<p>The strategy now includes opportunities for an additional 5,000 homes, though no changes have been made to the overall hierarchy.</p>	<p>Changes have been made to provide the opportunity and flexibility to accommodate around 5,000 additional homes to recognise that the 2018-based household projections indicate that growth may be higher than in the 2014-based projections which are used in the plan. The additional growth is in the following locations and from the following sources:</p> <table border="1" data-bbox="1002 645 1508 1489"> <thead> <tr> <th data-bbox="1002 645 1332 712">Location/source</th> <th data-bbox="1332 645 1508 712">Homes</th> </tr> </thead> <tbody> <tr> <td data-bbox="1002 712 1332 786">East Norwich</td> <td data-bbox="1332 712 1508 786">2,000</td> </tr> <tr> <td data-bbox="1002 786 1332 1081">Sites in Colney (200), Cringleford (50), Harleston (150), Wymondham (50), Aylsham (250) and Acle (140).</td> <td data-bbox="1332 786 1508 1081">840</td> </tr> <tr> <td data-bbox="1002 1081 1332 1216">Delivery from policy 7.5</td> <td data-bbox="1332 1081 1508 1216">800</td> </tr> <tr> <td data-bbox="1002 1216 1332 1350">Windfall allowance</td> <td data-bbox="1332 1216 1508 1350">1,360</td> </tr> <tr> <td data-bbox="1002 1350 1332 1489">TOTAL</td> <td data-bbox="1332 1350 1508 1489">5,000</td> </tr> </tbody> </table>	Location/source	Homes	East Norwich	2,000	Sites in Colney (200), Cringleford (50), Harleston (150), Wymondham (50), Aylsham (250) and Acle (140).	840	Delivery from policy 7.5	800	Windfall allowance	1,360	TOTAL	5,000
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Delivery from policy 7.5	800													
Windfall allowance	1,360													
TOTAL	5,000													
	<p>Limited further updates to housing numbers in tables.</p>	<p>To reflect updated commitment including housing windfalls granted permission in 2019/20 and changes to site numbers and allocations.</p>												
<p>Policy 2 Sustainable Communities</p>	<p>Stating that the indicative densities are net rather than gross in policy, with a resulting need to amend the glossary to define the terms.</p>	<p>To provide clarity and support the focus on appropriate densities in different parts of the area in line with the intentions of “Planning for the Future”.</p>												

	Expansion of the landscape clause of the policy to refer to local character including landscape, townscape and heritage.	Primarily in response to Historic England's view that the previous focus on landscape was too narrow.
	Inclusion of a requirement for public art (where appropriate).	In response to further internal review of policies, this is a successful part of existing JCS policy.
	The addition of a viability clause to the energy efficiency element of the policy.	In response to viability considerations. If the "Future Homes Standard" (scheduled for 2020) is implemented as consulted on and preferred by government in 2019, there will be no need to retain a local energy efficiency requirement as higher standards than those currently proposed in the GNLP will be required nationally.
	Text and policy to refer to the newly published National Design Guide.	To reflect recent publication of this guidance and in line with "Planning for the Future".
	Replace reference to the optional use of "Building for Life 12" (or any successor) to promote good urban design on housing developments with "Building for a Healthy Life" (or any successor).	To reflect the updating of <i>Building for Life 12</i> to <i>Building for a Healthy Life</i> urban design tool. This change to Building for Life has been made to place a greater focus on design promoting active lifestyles. Using the optional standard in this plan helps to ensure that good urban design is a priority ahead of the likely future requirement of site-specific design codes set out in "Planning for the Future".
	The "requirement" for masterplan / community engagement on 200+ dwelling sites is replaced by "encouragement".	In response to consultation comments – encouragement more closely reflects NPPF policy.
	Amendments to water management and flood risk policy.	To reflect consultation comments, primarily from the Environment Agency, and to better reflect NPPF policy.

<p>Policy 3 Environmental Protection and Enhancement</p>	<p>Built and Historic Environment</p> <p>Substantial amendments to the text and policy including:</p> <ul style="list-style-type: none"> • A reference to the need for developers to make use of existing guidance on historic areas, such as conservation area appraisals, along with documents produced by Historic England, particularly concerning tall buildings; • A policy requirement to undertake Heritage Impact Assessments where required. • Clearer language on harm to and retention of historic assets. 	<p>To reflect concerns expressed by consultees, particularly from Historic England, over the perceived lack of detail in policies. The revised wording has involved discussions over the level of detail which is appropriate in a strategic plan and the role that existing development management policies and supplementary guidance such as conservation area appraisals play in relation to the historic environment.</p>
	<p>Natural Environment</p> <p>Greater clarity on policy requirements for natural environment assessments.</p> <p>A policy requirement for 10% biodiversity net gain.</p> <p>Revised text and policy on mitigating impacts on HRA Directive protected sites</p>	<p>In response to a perceived lack of detailed policy requirements from the EA and NE.</p> <p>This previously flagged up approach reflects the passage of the Environment Bill through parliament and comments from the EA and NE, amongst others.</p> <p>This approach has been worked on for a number of years and is important to ensure that the GNLP meets legal requirements.</p>

	through the provision of informal greenspace and payments to make the sites themselves resilient, with the amount to be confirmed shortly through the NSPF funded study (likely just over £200 per home).	
Policy 4 Strategic Infrastructure	Updates to text on transport issues.	To reflect the passage of time since the Reg. 18C draft plan was produced.
	Inclusion of “changing attitudes to travel” as an aim of the Transport for Norwich Strategy.	To reflect its inclusion as part of the Transport for Norwich Strategy.
	Deletion of reference in policy to the cross-valley link, with a reference to its inclusion in Transport for Norwich included in the text.	To reflect the fact that there is currently no scheme for this proposal.
	Limited changes to the text and policy re. water infrastructure.	In response to comments from Anglian Water.
	Possible updates to appendix 1 setting out the infrastructure requirements to support growth (including health care provision).	Work is ongoing on updates to the Greater Norwich Local Plan Infrastructure Needs Report (GNLPINR) which informs the content of appendix 1. The work is scheduled to be completed by the end of the year and any resulting updates will be included in the Reg. 19 plan to be considered by Cabinets in January.
Policy 5 Homes	Minor changes to clarify that standard affordable housing obligations apply to purpose-build student accommodation.	In response to further internal review of policies.
	Text has been amended to make it clear that to meet the need for specialist retirement units as well as other forms of specialised housing, policy 5 supports delivery of such accommodation on housing sites with good access to local services including on sites allocated for residential use. The aim of this is to integrate older people and others with specialist housing needs with the wider community. Some specific site allocations are also made to help to meet the need.	The clarification is in response to the recent publication of county wide evidence showing that there is a need for 3,857 specialist retirement units (sheltered or extra care housing) to 2038. The recent permission for a care home for the elderly and supported living units for adults with learning difficulties on the R18 Mousehold Lane allocated housing site on the outer ring road in Norwich illustrates that sites will come forward to meet

	<p>This approach means that it is not necessary or desirable to meet the full need through specific allocations.</p> <p>Further to this, the text now clarifies that:</p> <ul style="list-style-type: none"> • Development management officers will ensure that the need for specialist housing for the elderly and others with specialised needs is considered on all housing schemes and advise applicants on the most up-to-date evidence of need; • On site allocations with an element of specialist housing in the policy (Taverham, Harleston, Aylsham and Barrack Street, Norwich) are included in the plan; • A specific allocation for such accommodation has now been made at Colney Hall. 	<p>specialised needs. This is because there is a clear demand for such accommodation.</p>
	<p>Policy 5 includes a criteria-based approach for considering Gypsies and Travellers and Travelling Show People sites. Outside of the local plan process, work remains to generate a supply of sites for Gypsies and Travellers and Travelling Show People.</p>	<p>Sites have not been submitted to the GNLP. Consequently, work is ongoing to confirm that current evidenced need is correct (51 pitches for Gypsies and Travellers from 2022 to 2028 and a Travelling Show Peoples’ site) and to provide sites through the planning application process to meet that need.</p>
<p>Policy 6 the Economy (including retail)</p>	<p>Text amended to reflect current economic uncertainty.</p> <p>Policy changes on the economy:</p> <ul style="list-style-type: none"> • Clarify that opportunities for sustainable access to employment sites should be maximised through development proposals and infrastructure investment; 	<p>Changes reflect consultation responses and current economic uncertainty, whilst retaining overall national policy approach of having a retail hierarchy, supporting growth in centres and allowing for increased flexibility.</p>

	<ul style="list-style-type: none"> • Change terminology to reflect the NSPF, identifying “<i>key strategic employment sites</i>” (consequential changes to policy 1 and the key diagram required); • Provide minor clarifications on the airport site leading to minor changes to employment land allocation figures overall. 	<p>An addendum is being produced to the 2017 GVA Economy, Retail, Town Centres Study which is to be completed by the end of November 2020. This provides advice on any further policy updates required beyond those made in response to the consultation which can be incorporated into the Reg.19 plan ahead of their consideration by cabinets in January 2021.</p>
<p>Further updates to evidence-based text and policy on economic growth potential, the amount of employment land needed and key trends in employment location will be made on completion of the addendum (see box to the right).</p>		
<p>Updates on retail text and policy to reflect current growth in locally based retailing and promote active travel to local facilities. The policy and text now:</p> <ol style="list-style-type: none"> 1. Set out the hierarchy of centres across the area; 2. Encourage development in all centres and, outside defined centres, small scale businesses to serve local areas, including villages; 3. Reference the promotion of new local centres in the site-specific policies for all strategic housing developments (over 1,000 homes); 4. Require a flexible approach in centres to allow diversification while retaining their role as economic and community hubs. <p>Please note that DM policies already set parameters for development at Longwater and the Showground, whilst some updates on providing a local centre are being considered for the Showground site allocation policy.</p>		

Policy 7 Strategy for Areas of Growth

7.1 The Norwich urban area including the fringe parishes	Updated housing numbers and proportions of housing growth in this area.	To reflect the collation of 2019/20 figures, changes over time and the sites added or uplifted, reflecting the deliverability of the added homes and to recognise that the 2018-based projections indicate that growth may be higher.
	Delete reference to the high proportion of retail floorspace in the area currently being in the city centre – draft plan figures now out-of-date and updates not available.	In response to consultation comments.
	Text and policy changes to refer to: <ul style="list-style-type: none"> • conserving and enhancing the historic environment, design in the city centre (removing the reference to landmark buildings at gateways) and to clarify the requirement for riverside development to achieve long-term strategic aims; • retention of the leisure area and late-night activity zone; • national changes to the Use Class Order; • protection of Carrow Abbey CWS in the East Norwich proposals; • Development at Norwich Research Park and Easton & Honingham employment areas addressing transport and infrastructure impacts. 	In response to consultation comments from Historic England, Natural England and further internal review of policies.
	Change Map 9 showing strategic growth areas to correct error.	In response to the further internal review of the plan.

	<p>Other policy changes to housing numbers at sites, growth locations and overall to reflect:</p> <ol style="list-style-type: none"> 1. Updated commitment 2019/20; 2. Added sites at the CC15 Norwich Mail Centre at Thorpe Road (+150) and CC13 the car park site at Lower Clarence Road (+45), Norwich, CC2 Ber Street (+20), GNLP0159R Beech Avenue, Taverham (+12) 3. Deleted sites at R35 Havers Road (-80), GNLP2159 – Ber Street (-150), and a reduction in site size R31 Waterworks Road (-90). 	<p>As above, to reflect the collation of 2019/20 figures, changes over time and the sites added or uplifted.</p>
	<p>Additional homes to reflect 2018-based household needs projections at East Norwich, Colney Hall and Cringleford (see above). Costessey to be contingency site for 800.</p>	
<p>7.2 Main towns</p>	<p>Updates on numbers to reflect windfall permissions in 19/20.</p>	<p>To reflect the collation of 2019/20 figures.</p>
	<p>Long Stratton – no changes</p>	
	<p>Aylsham – a reasonable alternative site for 250 homes off the Norwich Road, including specialist retirement homes, has been added.</p>	
	<p>Diss – amended text states the housing requirement for new allocations remains at 400. The key Frontier site neighbouring the railway station (for 200 homes) will be allocated through the GNLP and the remaining 200 homes will be allocated through sites in the Diss and District Neighbourhood Plan.</p>	<p>To reflect the commitment to a Neighbourhood Plan to include some of the site allocations for Diss in accordance with the strategic direction from the GNLP.</p>
	<p>Wymondham</p> <ul style="list-style-type: none"> • Delete the 1,000-home contingency; • uplift numbers on Johnson’s Farm site from 50 to 100 homes. 	<p>Additional homes to reflect deliverability of added homes and to recognise that the 2018-based projections indicate that growth may be higher (see above).</p>

	<p>Harleston</p> <ul style="list-style-type: none"> 150 homes uplift on site in the south-east of Harleston (mainly homes for the elderly). 	
7.3 Key service centres	Updates on numbers to reflect updated commitment in 19/20.	
	140 additional homes on a site extension on the west side of Acle providing a link road (total 320).	
	Addition of 40 homes on a revised site in Chedgrave (total 60).	
7.4 Village clusters	<p>Updates on numbers to reflect updated commitment in 19/20 and to reflect:</p> <ul style="list-style-type: none"> changed site in Lingwood; deletion of small site in Honingham; expansion of preferred site to add 20 homes in Horsham St. Faith (total 50). 	To reflect the collation of 2019/20 figures and in response to consultation comments.
	Inclusion of employment allocation extension at Horsham St. Faith.	In response to consultation comments.
	Include policy reference to the potential for some expansion of existing small and medium sized employment sites within settlement boundaries.	
7.5 Small scale windfall housing development	<p>Change to the policy and inclusion of an appendix to allow development of up to 5 homes on small sites in the plan period in larger parishes. The definition of “larger” is based on the number of homes in a parish in 2020. The limit has been kept at 3 homes in smaller parishes. The parishes in the two categories are listed in a new appendix 7.</p> <p>The policy has also been revised slightly in terms of its presentation.</p>	<p>To better reflect the greater range of services available in larger parishes, support village life and allow more opportunities for small-scale builders.</p> <p>The presentation of the policy has been amended to a criteria-based format to make it more legible now that it includes greater complexity.</p>

New policy 7.6 on New Settlements	A policy and supporting text has been included which commits to one or more new settlements being brought forward through the next plan.	To reflect the key role that new settlements will play in meeting growth needs in the next plan and to enable work to start on this in tandem with the GNL P plan-making process.
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APPENDIX 2

List of Norwich site allocations in Regulation 19 GNLP

Address	Site Reference	Area (Ha)	Proposal
<p>East Norwich Strategic Regeneration Area incorporating:</p> <p>a) Land at the Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former May Gurney site at Trowse in South Norfolk (approx. 21.35 ha)</p> <p>b) Land at Carrow Works, Norwich (approx. 19.91 ha)</p> <p>c) Utilities Site, Norwich (approx. 6.92ha)</p> <p>d) Land in front of ATB Lawrence Scott (0.39 ha)</p>	GNLP0360/3053/R10	48.57	Residential led mixed use development including housing, community, education and leisure facilities, employment and retail, local greenspace, biodiversity areas and recreational open space as part of a balanced mix, together with all necessary supporting vehicular, pedestrian, cycle and public transport access infrastructure. The site is expected to deliver in the region of 4000 homes subject to confirmation through detailed master planning as defined in policy 7.1 of GNLP strategy.
Land adjacent to the River Wensum and the Premier Inn, Duke Street	GNLP0068	0.12	Residential led mixed-use development for a minimum of 25 homes or student accommodation 125 bedrooms.
UEA - Land adjoining the Enterprise Centre at Earlham Hall (walled garden and nursery)	GNLP0133-BR	1.29	University-related uses, including offices (Use class E(gi), research and development (Use class B1(gii)) and educational uses (Use class F1) providing in the region of 5,000 sqm of floorspace
UEA – Land North of Cow Drive (the Blackdale Building, adjoining Hickling House and Barton House)	GNLP0133-C	0.89	Student accommodation, (a minimum of 400 beds (equivalent to 160 homes)) may include a small element of ancillary university related uses.
UEA – Land between Suffolk Walk and Bluebell Road	GNLP0133-DR	3.96	University related development for both academic and non-academic uses.
UEA - Land at the Grounds Depot Site, Bluebell Road	GNLP0133-E	1.60	Student accommodation, in the region of 400 beds (equivalent to 160 homes) which may include a small element of ancillary university related uses
Land at Constitution Motors, 140-142 Constitution Hill	GNLP0282	0.27	Redevelopment for a minimum of 12 homes.
Former Eastern Electricity Headquarters (Dukes Wharf), Duke Street	GNLP0401	0.83	Residential-led mixed-use development including a minimum of 100 homes (or at

Address	Site Reference	Area (Ha)	Proposal
			least 250 student bedrooms). May also include employment, managed workspace retail, leisure, financial and professional services, education and cultural uses.
Land at Whitefriars	GNLP0409AR	1.61	Residential led mixed use 220 dwellings
Land South of Barrack Street	GNLP0409BR	2.17	Residential led mixed-use development (200 dwellings),
Land adjoining Sentinel House (St Catherine's Yard), Surrey Street	GNLP0451	0.38	Residential development (minimum 40 homes or 200 student bedrooms)
Land at and adjoining Anglia Square	GNLP0506	4.79	Residential-led mixed-use development including in the region of 800 homes, student accommodation, retail units, offices and flexible workspace, hotel, leisure and hospitality uses and community facilities as part of a balanced mix.
Land known as 'Site 4', Norwich Airport	GNLP1061R	42.46	Aviation related employment and aviation educational uses.
Land at and adjoining St Georges Works, Muspole Street	GNLP2114	0.57	Residential led mixed-use development (to provide a minimum of 110 homes together with 5000sqm offices and managed workspace and potentially other ancillary uses such as small-scale retailing.)
Friars Quay car park, Colegate (former Wilson's Glassworks site)	GNLP2163	0.13	Residential development (25 homes minimum). Offices or other commercial uses would be appropriate as a small element of the scheme on the frontage to Colegate.
Land West of Eastgate House, Thorpe Road	GNLP2164	0.19	Residential development (in the region of 20 homes)
St Mary's Works	GNLP3054	1.05	Comprehensive mixed-use development to include residential and employment uses, with the possible addition of a hotel. (150 homes minimum)
147-153 Ber Street	CC2	0.18	Mixed use 20 dwellings
10-14 Ber Street	CC3	0.11	Residential led mixed use 10 dwellings
Land at Rose Lane/Mountergate (Mountergate West)	CC4a	1.20	Mixed-use to include high quality office space, managed workspace and live work units and up to 50 dwellings
Land at Mountergate/Prince of	CC4b	2.39	Mixed-use to include up to 200 dwellings, student

Address	Site Reference	Area (Ha)	Proposal
Wales Road (Mountergate East)			accommodation, office space, hotel and tourism uses.
Hobrough Lane, King Street	CC7	0.35	Residential led mixed use with min of 20 dwellings
King Street Stores	CC8	0.21	Residential 20 dwellings
Land at Garden Street and Rouen Road	CC10	1.08	Mixed use to include approx. 100 dwellings and small scale office/business units
Land at Argyle Street	CC11	0.32	Residential 15 dwellings
Land at Lower Clarence Road	CC13	1.00	Residential 45 dwellings
Norwich Mail Centre, 13-17 Thorpe Road	CC15	1.52	Residential led mixed use 150 dwellings
Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way	CC16	2.23	Mixed use to include 270 dwellings, leisure, community, office and ancillary small retail uses.
Land at 140-154 Oak Street and 70-72 Sussex Street	CC18(part) & CC19	0.27	Residential 27 homes
Land to rear of City Hall	CC24	0.40	Mixed use which may include 20 dwellings, offices and managed workshops, food and drink and small scale retail uses. Alternatively a hotel with residential.
Westwick Street Car Park	CC30	0.30	Residential 30 dwellings
Land at the Neatmarket, Hall Road	R1	4.51	Employment (Use classes B2/B8 and E(giii))
Ipswich Road Community Hub, 120 Ipswich Road	R2	0.78	Residential 15 dwellings as either general housing or accommodation for older people or people with special needs. Or development expanding on existing community support and educational facilities.
John Youngs Limited, 24 City Road	R7	0.89	Residential 45 dwellings
Site of former Gas Holder at Gas Hill	R13	0.30	Residential 15 dwellings
Land at Ketts Hill and east of Bishop Bridge Road	R14/15	1.65	Residential 80 dwellings
Site of former Van Dal Shoes, Dibden Road	R17	0.54	Residential 25 dwellings
Site of former Start Rite Factory, 28 Mousehold Lane	R18	0.86	Residential 40 dwellings or care home
Land North of Windmill Road	R19	0.19	Residential 17 dwellings
Land east of Starling Road	R20	0.27	Residential 23 dwellings

Address	Site Reference	Area (Ha)	Proposal
Two sites at Hurricane Way, Airport Industrial Estate	R29	Site A: 0.26 Site B: 2.28	Residential and Light industrial 30 dwellings
Land at Holt Road	R30	1.33	Employment (E(gii/iii), B2 and B8)
Heigham Water Treatment Works, Waterworks Road	R31	1.37	Housing led mixed use 60 dwellings and open space
Site of former Earl of Leicester Public House, 238 Dereham Road	R33	0.14	Residential 10 dwellings
Mile Cross Depot	R36	4.40	Mixed use 170 dwellings with associated community uses
The Norwich Community Hospital Site, Bowthorpe Road	R37	5.30	Hospital development and ancillary activities, plus associated supported living, care and key worker accommodation, and residential development. 80 dwellings
Three Score, Bowthorpe	R38	25.29	Urban extension. 900 dwellings, open and play space and associated infrastructure.
Land West of Bluebell Road, and north of Daisy Hill Court/Coralie Court, Westfield View	R42	3.40	Older peoples residential 100 dwellings

Integrated impact assessment



NORWICH
City Council

Report author to complete

Committee:	Cabinet
Committee date:	20 January 2021
Director / Head of service	Graham Nelson
Report subject:	Greater Norwich Local Plan Regulation 19 consultation
Date assessed:	4 January 2021

	Impact			Comments
	Neutral	Positive	Negative	
Economic (please add an 'x' as appropriate)				
Finance (value for money)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Once adopted, the GNLP will have positive impacts in supporting housing and employment growth across Greater Norwich, which will benefit the local economy.
Other departments and services e.g. office facilities, customer contact	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICT services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Economic development	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan promotes economic development and in particular seeks to generate the right levels of growth in the right places in order to help our local economy by stimulating economic investment, new infrastructure, new technologies and environmental improvements. This in turn will improve access across Greater Norwich to services and jobs, and lead to better environmental quality. The plan proposes that the city centre will continue to play a significant role as the economic dynamo of the areas by providing excellent retail and leisure facilities along with a broad range of cultural and tourism attractions and new jobs needed to support housing growth across the Greater Norwich area.
Financial inclusion	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan addresses the impacts of social deprivation and the need for financial inclusion, through for example the provision of affordable housing and encouragement of new local jobs.

	Impact			
Social (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Safeguarding children and adults	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>S17 crime and disorder act 1998</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Human Rights Act 1998	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Health and well being	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan supports healthy communities and healthy and active lifestyles by encouraging green infrastructure and improving connectivity by sustainable means, and also encouraging new communities to be well integrated with existing communities and to be attractive places to live. The plan also seeks to ensure that there is good access to services including health care and leisure facilities. The plan also seeks to deliver high quality homes.
Equality and diversity (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Relations between groups (cohesion)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan encourages growth of vibrant and healthy communities with good access to jobs, services and facilities, helping to reduce disparities between the life chances of disadvantaged and other communities. New communities will be well-integrated with existing communities and will be safe and attractive places to live.
Eliminating discrimination & harassment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Impact			
Advancing equality of opportunity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	This will be addressed through encouragement of vibrant and healthy communities (see 'relationships between groups' above), but also through delivery of high quality homes to meet housing needs across all tenures.
Environmental (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Transportation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan promotes delivery of transport infrastructure to support existing and new communities, and supports modal shift in transport use. It also seeks to improve connectivity both within Greater Norwich and to other parts of the country, provide greater travel choices, and allow people to make the best use of evolving sustainable transport networks.
Natural and built environment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan's policies protect and enhance the natural and built environment, making the best use of natural resources. It aims to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change, and it supports and promotes clean growth and progress towards a post-carbon economy.
Waste minimisation & resource use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Policy 2 sets out that development should be resource efficient and support sustainable waste management. Norfolk County Council is the minerals and waste local authority and is preparing a local plan review so the GNLPR does not therefore cover minerals and waste. The Greater Norwich Local Plan Infrastructure Report (GNLPIR) focuses on matters such as waste management.

	Impact			
Pollution	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan supports modal shift of transport which will result in reduced vehicle pollution. The plan seeks to reduce emissions in order to meet the national commitment to achieve net zero greenhouse gas emissions by 2050.
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Energy and climate change	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The plan aims to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change and to help in meeting national commitments to achieve net zero greenhouse gas emissions by 2050. It also supports and promotes clean growth and progress towards a post-carbon economy.
(Please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Risk management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Regulation 19 draft of the GNLP has been prepared under an accelerated timescale, using transitional arrangements. The GNDP Board considers that the benefits of proceeding under the transitional arrangements outweighs any risks posed by the accelerated timescale.

Recommendations from impact assessment

Positive

Negative

Neutral

Issues

Many of the plan's impacts are positive as noted above and several are neutral; there are no identified negative effects. The GNLP is a strategic planning document and as such is focused on strategic rather than detailed matters (some detailed impacts will be considered at planning application stage and will be covered by other legislation and guidance such as the Equality Act and Building for a Healthy Life).

The strategic approach taken by the plan, both in its overarching and site-specific policies, has many benefits to all sectors of the community across Greater Norwich. For example, the plan's approach to co-locating homes with services as far as possible, has benefits for disadvantaged groups and supports healthy and active lifestyles, and will result in reduced carbon emissions.