NORWICH City Council

Sustainable development panel

Date: **Wednesday, 15 January 2020**
Time: **09:30**
Venue: **Westwick room, City Hall, St Peters Street, Norwich, NR2 1NH**

Committee members:*

Councillors:
Stonard (chair)
Maguire (vice chair)
Carlo
Davis
Giles
Grahame
Lubbock
Maxwell
Stutely

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Agenda

implementation of policies on retail monitoring and consider whether to implement them in a more flexible manner or to take an alternative approach taking into consideration market demands and trends.

Date of publication**: Tuesday, 07 January 2020**

MINUTES

Sustainable Development Panel

09:30 to 11:10 **13 November 2019**

Present: Councillors Maguire (vice chair, in the chair for the duration of the meeting), Stonard (chair, from item 4 below), Carlo, Giles, Grahame, Lubbock and Stutely

Apologies: Councillors Davis and Maxwell

1. Declarations of Interest

There were no declarations of interest.

2. Minutes

RESOLVED to approve the accuracy of the minutes of the meeting held on 16 October 2019.

3. Terms of Reference

The vice chair introduced the report.

Members noted that both the sustainable development panel and the climate and environment emergency executive panel were advisory groups to cabinet.

RESOLVED to:

(1) note that the council has established a climate and environment emergency executive panel (CEEEP);

(2) approve the amendment of the terms of reference for the sustainable development panel by transferring the following terms of reference to the CEEEP:

(a) monitoring the progress of the council's environmental strategy and carbon management programme:

(b) consider how the council's environmental strategy, carbon reduction programme and associated policies tackle the issues of climate change, carbon reduction and sustainable development;

(c) overseeing the implementation of the action plan for the integrated waste management strategy;

(d) the development of specific environmental strategies including trees, parks, play areas and natural areas;

(3) approve the revised terms of reference as set appendix 6 of the report.[1]

4. Regulation 10a Review of Local Plan

(Councillor Stonard, chair, joined the committee during this item. Councillor Maguire, vice chair remained in the chair).

The planner policy presented the report. She then referred to the Appendix 1 and highlighted the 15 DM policies that were considered “fit for purpose” for decision making until a review could take place, but which could benefit from minor updates or clarifications to make the policies easier to use or required further evidence to make the policies more effective. The Environment Bill was expected to have an impact on a number of policies if/when it became legislation.

During discussion, the planner (policy), the planning policy team leader and the senior planner, referred to the report and answered members’ questions.

A member said that she was frustrated that local planning authorities could not be more flexible when interpreting polices. She pointed out that large housing developments were still coming forward for determination with gas heating, when the government had stated that from 2025 that gas heating in new builds would no longer be permitted. The council should be encouraging the use of sustainable, renewable and low carbon energy. Other members considered that opportunities to increase the use of renewable energy were being missed and said that actions to mitigate the climate and environment emergency need to be taken now and the review of the policy should not be delayed. Members were advised that policy DM4 referred specifically to renewable energy schemes such as solar power farms rather than renewable energy provision on all development sites. There had been one solar farm application in Norwich but this policy was used infrequently. The Greater Norwich Joint Core Strategy required energy efficiency of new builds at 10 per cent. Any changes to policy in relation to new developments could not conflict with the JCS policy and would be reviewed as part of the strategic policies for renewable energy in the emerging Greater Norwich Local Plan (GNLP). The senior planner pointed out that an unintended consequence of requiring all new build houses, for instance, to be provided with solar panels could be a reduction in the percentage of affordable housing provided.

[1] The planning policy team leader subsequently advised that the reference to the “Local Development Framework” should be updated to “the Local Plan and other policy guidance”. 2 therefore should read:
2. Preparation and implementation of planning policy including the Local Plan and other policy guidance.

Discussion ensued on a number of policies. Councillor Stutely, as chair of the licencing committee, said that he welcomed the review of policy DM23 relating to the boundaries of the late night economy. Members noted that a number of policies needed to be tightened up to provide greater clarity, which included the policy itself, supporting text or guidance. The planning policy team leader said that input from members, particularly from planning applications committee members, when new policy was drafted could be considered, perhaps through workshops. Changes to DM23 would inform the emerging local plan. She also explained, in relation to DM27 (Norwich Airport) that the Airport Masterplan had now been endorsed and the operational area has also changed so these issues would need to be reflected when the policy was reviewed.

Councillor Stonard pointed out that it would be illogical to consider DM policies which could conflict or were not consistent with the strategic policies in the emerging GNLP. He explained the timescale for the review of local plan policies in the context of the broader process of preparation of the GNLP. Members of the panel concurred that DM4 should be "amber" and not "green" as it was considered desirable to address issues as renewable energy. The panel also requested a "roadmap" to explain the processes for reviewing the DM policies.

In reply to a member's question Councillor Stonard explained that where 33 per cent of affordable housing was viable on a Greenfield sites, brownfield sites needed preparation such as demolition or decontamination and the policy needed to be flexible on viability grounds. The planning policy team leader advised members that the panel had considered the revised Affordable Housing SPD (27 February 2019) which was adopted by cabinet (12 June 2019 effective from 1 July 2019) and that the policy for affordable housing was in the Joint Core Strategy and outside the scope of the Regulation 10a review.

Discussion ensued on the site allocation for sites R14 and R15, both east of Bishop Bridge Road. A member suggested that the gasholder should be preserved to combine the gas holder and the natural heritage of the area. The planning policy team leader confirmed that both sites were designated as development sites in the current local plan. Members commented that there was a shortage of housing in the city and there was potential for these sites to be developed. It was considered that a lot of the trees on these sites were self-seeded. The same member also suggested that as Argyle Street had a history of subsidence, it was not sensible to designate CC11 for further development. In response the vice chair suggested that building techniques had improved making the site viable for development. The planning policy team leader confirmed that the council owned this site. Another member suggested that it was important to provide dense housing to meet housing need and to ensure that there were pockets of open space available rather than providing low density housing everywhere. Members also considered that the communal spaces at Goldsmith Street developed communities. Density of housing needed to be relevant to the site. Another member suggested that it was important to biodiversity to have areas that were not hard surfaced.

RESOLVED to recommend to cabinet that it endorses the Regulation 10A review of local plan policies and the proposal to commence review of the DM Policies plan following the Regulation 19 stage of the Greater Norwich Local Plan, likely to be in spring 2021, subject to:

(1) further consideration as part of the 2021-22 budget process,

(2) moving policy *DM4 Providing for renewable and low carbon energy* into the amber category because a further review is considered desirable to address issues such as renewable energy;

(3) note that the sustainable development panel asked for a report comprising a “roadmap” to outline the process for addressing a number of policy issues as part of the forthcoming review of the DM Policies plan.

CHAIR

Report to	Sustainable Development Panel	**Item**
	15 January 2020	
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

Graham Nelson, Director of place	01603 212225
Judith Davison, Planning policy team leader	01603 212529

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 owns 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 GNDP 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 towns[1], 8% in key service centres[2], 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;

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[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 deliverable 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.

Greater Norwich Local Plan

Draft Plan

Document 1 The Strategy

V 8.3

Contents

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	Policy 6 The Economy (including retail) – sets out details of the main strategic employment areas, the key business sectors, and additional jobs needed up to 2038.	83
	Strategy for the areas of growth This section specifies where new housing growth will be distributed, and any specific policies linked to each location. The areas covered are: **Policy 7.1 Norwich urban area including the fringe parishes** **Policy 7.2 The main towns** **Policy 7.3 The key service centres** **Policy 7.4 Village clusters** **Policy 7.5 Small scale windfall housing development**	88
6. Appendices	**Draft plan appendices:** 1. Infrastructure requirements 2. Glossary 3. Monitoring framework 4. Retained and superseded plans 5. Village clusters **Appendices to be included in Publication Stage plan** Appendix 6 Amendments to policies maps Appendix 7 Superseded policies Appendix 8 How plan policies implement the GNLP's objectives Appendix 9 Housing delivery trajectories	114

Document 2 The Sites

Site Allocations	Introduction The Sites document is organised according to the settlement hierarchy by: Norwich and the fringe parishes, Main towns, Key service centres and Village clusters in Broadland (see policies 1 and 7 for further details). It includes: • Maps and site allocation policies for preferred option sites; • Maps and information for reasonable alternative sites; • Information on rejected sites.

THE CONSULTATION (*Note – this box is for this consultation only and is not part of the draft plan)*

What is this document?

This consultation is the **draft** version of the **Greater Norwich Local Plan (GNLP)**, also called the Regulation 18 draft plan.

There are two parts to the **GNLP** we are consulting on:

1. The first is **this draft GNLP Strategy**. It contains the planning strategy for growth in Greater Norwich from 2018 to 2038.
2. The second is the **draft GNLP Sites** document. It has planning allocation policies for the sites we propose to deliver the strategy[1].

At this stage of plan making we have identified preferred options for the approach we think should be taken. In some cases, we have also identified reasonable alternative options.

The plan documents are supported by an **Interim Sustainability Appraisal** which evaluates the draft plan and **other evidence** which is also available for comment.

Your responses to questions and comments on any part or all of these documents are welcomed to help us produce the next version of the plan.

The GNLP stages

The table below sets out the timetable for the GNLP, highlighting the current stage.

Stage	Dates
Call for Sites	May to July 2016
Regulation 18 Preparation Stage	
Growth Options and Site Proposals consultation	January to March 2018
New, Revised and Small Sites consultation	October to December 2018
Regulation 18 Draft Plan consultation	**January – March 2020**
Regulation 19 Publication Stage	
Pre-submission Draft Plan for representations on soundness and legal compliance	January – February 2021
Regulations 22 to 26 Submission, Examination and Adoption Stages	
Submission of GNLP to the Secretary of State	June 2021
Public Examination	November/December 2021
Adoption of the Greater Norwich Local Plan	August/September 2022

To get to this stage, in early 2018 we consulted on options for the broad planning strategy for the area, along with more than 600 sites suggested for allocation by site owners or agents. A second consultation on more than 200 additional suggested sites followed in late 2018.

How we will use your responses

We will use your consultation responses to inform the next version of the plan, the Publication Version of the GNLP (the Regulation 19 version) which will be the councils' chosen plan. In January and February 2021, it will be possible to comment on the plan's soundness.

[1] The two parts of the draft plan meet the requirements of Regulation 18 of the Town and Country (Local Planning) Regulations 2012 (as amended) for plan making.

A Government appointed Inspector will then consider these comments at the plan's Public Examination, which is currently scheduled to start in November/December 2021.

From there we expect the plan to be adopted in August/September 2022.

How you can respond to this consultation

There are two ways you can respond to this consultation – by submitting your comments online, or in writing. Ideally, please submit your consultation responses to us online at www.gnlp.org.uk. However, written responses can also be made on a response form, which you can request by phoning us on 01603 306603 or emailing gnlp@norfolk.gov.uk

Please note that this consultation runs from 09.00 on Wednesday 29 January to 17.00 on Monday 16 March 2020.

Important things to be aware of when responding

There are consultation questions asking whether you agree with the proposed approach in this draft consultation plan. There is an open question at the end where you can make any additional comments you feel necessary. We have also included boxes (in this colour) after the policies which contain alternative approaches to those policies. These may help you in making your consultation responses. Wherever possible, please could you set out reasons for your responses and any additional evidence that you think may be relevant.

Please also note that consultation responses will be available publicly.

FOREWORD

FOREWORD

Broadland, Norwich and South Norfolk, which make up Greater Norwich, are great places to live, work and invest. This is why we need to make sure that our unique area is well-planned, and that growth brings with it benefits for all and provides for a sustainable future.

Our strong local economy is set to grow significantly over the coming years and promoting prosperity within Greater Norwich is a priority.

Economic growth needs to be encouraged in the right locations, providing opportunities for businesses to expand or relocate to our area, encouraging innovation and building on our strengths, particularly in the agri-tech and scientific sectors.

The planned growth looks to the future, delivering high-quality homes, new jobs and supporting infrastructure – which increasingly includes broadband connectivity as well as roads, schools and health care. We need to find housing sites that are sustainable in the longer-term and provide homes for all. From young people looking for their first home through to meeting the needs of an ageing population.

Protecting our environment and habitats and creating new green spaces is a key consideration as we develop a low carbon economy and respond to climate change.

This plan identifies where growth is needed over the next 20-years with Government targets stating that about 44,500 new homes will be required. The good news is, we already have plans in place that identify locations for 82% of the new homes. We have also already planned for new jobs, green spaces and the additional infrastructure.

In developing this plan, the district councils, county council and Broads Authority have been working together to make best use of the current infrastructure and identify the new infrastructure we will need.

It is important that as those living and working in Greater Norwich, you share your views on our approach and the sites in this draft plan. Please get involved and have your say about growth in Broadland, Norwich and South Norfolk to help us finalise the plan we will submit to the Government.

Councillor Shaun Vincent, Chair of the Greater Norwich Development Partnership

SECTION 1 – INTRODUCTION

Why we are producing this plan

All planning authorities need to produce a local plan to guide planned growth in their local area. Our current plans mainly run to 2026 and we now need to plan further ahead to 2038 to keep our plan up-to-date in rapidly changing times and to meet Government requirements.

In the Greater Norwich area Broadland District Council, Norwich City Council and South Norfolk Council are working together to produce a single plan. This also includes working closely with Norfolk County Council and the Broads Authority.

Work has been undertaken over the past two years on the development of the plan which has included a call for developers and landowners to put forward sites and two previous consultation exercises.

We are following a process set out by Government on how local plans should be developed. This includes following the requirements of the National Planning Policy Framework. The final plan will be examined by the Planning Inspectorate who will make a judgement on whether it is sound and fit for purpose. This plan has been structured in a way to meet these requirements which means some aspects of it are repeated.

The Greater Norwich Development Partnership is now embarking on consultation on the draft local plan (Regulation 18) and aside from publishing the document there will be various events during the consultation period where you can meet with the team to discuss the content and ask any questions face to face. Any views you wish to put forward must be submitted in writing.

Once this consultation has been completed an updated local plan and set of supporting documents will be assembled and as part of the next stage, the Publication stage (Regulation 19). The Publication stage will include further consultation on the plan prior to submission to the Government. However, the Publication stage is more of a technical process, for example covering legal aspects and therefore it is vital that any comments and views you have now are made as part of this consultation.

Setting the scene – a vibrant place to live and work

1. The Greater Norwich economy draws on Norwich's role as the regional capital, the dynamism of other strategic employment locations such as Norwich Research Park, excellent higher education facilities including the University of East Anglia and Norwich University of the Arts, as well as rapidly improving transport links.

2. Our strengths also include the excellent quality of life on offer, our wonderful natural environment, and our heritage - from the vibrant and historic city centre of Norwich to our dynamic market towns and villages. Combined, these will play a pivotal role in Greater Norwich's economic success.

3. In putting this plan together, we must take a long-term view of our development needs to allow the housing, jobs, services and infrastructure we need to be provided at the right time and in the right places. Such a long-term plan-led approach is both good planning and required by Government.

4. The Greater Norwich Local Plan (GNLP) therefore not only provides the planning strategy, it also identifies the sites to meet Greater Norwich's growth needs from 2018 to 2038 sustainably.

Planning to our strengths

5. Greater Norwich is recognised nationally as a key engine of growth and one of the fastest growing parts of the country. It is an area establishing itself as a leader in science, technology and advanced manufacturing with strong connections to Cambridge as part of the Cambridge Norwich Tech Corridor. We must continue to build on our strengths and are committed to help turn world class knowledge and ideas into world class jobs, particularly in life sciences and biotechnology, agri-tech, food and drink, information and communication technology (ICT), digital creative industries and high-value engineering. These are all significant growth sectors, but we also need to support and boost other sectors underpinning our economy such as financial services, culture and tourism.

6. To do this, we must make the most of our main strengths whilst also planning flexibly for new jobs, homes and infrastructure. The GNLP must also assist the move to a post-carbon economy and protect and enhance our many environmental assets. It needs to ensure that we can deliver well-designed new development to create attractive, sustainable, resilient and inclusive new communities. This will ensure that Greater Norwich continues be both a great place to live, work and visit, as well as a place capable of attracting new investment and jobs.

7. Making sure that jobs, infrastructure and housing developments take place is key to the success of the GNLP. In recent years, significant new infrastructure such as the Broadland Northway road and public transport and cycling improvements have been delivered, with more planned, while jobs growth has been strong and there has been a major recent increase in housebuilding.

Planning flexibly for a changing world

8. We live in a world of rapid technological, economic, population and climate change. This provides both challenges and opportunities, with Greater Norwich in a strong position to make a major contribution to the UK's transition to a post-carbon economy. Our world leading role at the forefront of food and health research at Norwich Research Park, fast growing digital creative industries in the city centre and high value engineering at Hethel are just some of the examples of how we are well placed to play a leading role in clean growth.

9. The proposed 2025 ban of heating new homes with fossil fuels, the proposed 2040 ban on petrol and diesel engines and the nation's 2050 commitment to achieving zero greenhouse gas emissions will become major factors affecting development through the plan period, particularly in relation to energy policy and urban transportation. It is therefore essential that we plan flexibly for this changing world.

How the GNLP fits in with other planning bodies and strategies

10. Our ambitions for delivering sustainable growth through the GNLP must reflect the Government's requirements for local plans set out in the National Planning Policy Framework (NPPF). This, along with other national, regional, county and local strategies, agreements, initiatives and priorities, provide the context for development in Greater Norwich.

11. Projects of national significance, such as infrastructure linking offshore windfarms to the national grid and improvements to trunk roads (the A11 and A47 in Greater Norwich), are assessed at the national level.

12. At the regional level important strategies and initiatives include the New Anglia Local Enterprise Partnership's existing Norfolk and Suffolk Economic Strategy (NSES), the emerging Norfolk and Suffolk Local Industrial Strategy, which builds on the NSES, and the Cambridge Norwich Tech Corridor initiative. These set the context for economic growth.

13. At the county level, the Norfolk Strategic Planning Framework (NSPF) is an agreement between planning authorities on approaches to strategic infrastructure, housing and jobs numbers and common policy approaches. Importantly, the NSPF, along with agreements with neighbours in Suffolk, states that Greater Norwich will provide for all its housing and jobs growth needs within its own boundaries as will its neighbours. It also states that Greater Norwich City Deal growth requirements, agreed with Government in 2013, will be met through the GNLP. The Norfolk Strategic Planning Framework and work with Suffolk authorities meet the Government's requirement for a Statement of Common Ground and the "Duty to Co-operate".

14. Transport priorities which influence the GNLP are set out in several other strategies including: the Norfolk Local Transport Plan; the Norwich Area Transportation Strategy; the emerging Transport for Norwich strategy and Transforming Cities[2] . These are in addition to national and regional rail and road investment strategies and programmes.

15. Norfolk County Council is the Minerals and Waste local authority. It is preparing a local plan review to consolidate its three current adopted plans into one and to extend its plan period to 2036. The GNLP therefore does not cover minerals and waste issues.

16. At the local level the district councils' visions, objectives, priorities and ambitions have influenced this strategy, mainly through the GNLP Vision and Objectives. These documents are the Broadland Business Plan 2019 to 2023, the Norwich City Vision 2040 and South Norfolk's vision, delivered through its 'Moving Forward Together' document.

The GNLP and other local plan documents

17. The currently adopted strategy plan to 2026, the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS), along with adopted Site Allocations Plans, Area Action Plans (AAPs) for the Growth Triangle, Long Stratton and Wymondham and Neighbourhood Plans in each of the three districts, already set out where a high proportion of the housing (82%) and jobs growth required by the GNLP to 2038 will be located.

18. When adopted, the GNLP will supersede the current JCS and the Site Allocations documents in each of the three districts. The great majority of the undeveloped sites in the Site Allocations plans are re-allocated through the GNLP[3].

[2] Transforming Cities is a national fund for sustainable travel improvements which Transport for Norwich secured £6.1 million from in early 2019 and is bidding for further funding.
[3] Subject to evidence of delivery by 2038.

19. The GNLP will not replace existing adopted Area Action Plans for Long Stratton, Wymondham and the Growth Triangle (NEGT) or Neighbourhood Plans, though in some cases additional allocations are made through the GNLP in these areas.

20. The GNLP will also not amend existing adopted Development Management policies for the three districts except in circumstances where limited policy changes, identified in this plan, are required to implement the strategy[4].

21. Further detail on retained and superseded plans is in appendix 4.

22. While the GNLP sets out plans for the additional growth needed to 2038 and identifies the best ways for establishing long-term growth, we also need to look beyond the end date of the plan by setting a strategy that can be sustainably added to in the long term.

23. This document proposes a broad locational strategy for sites and contains thematic strategic policies covering crucial issues such as supporting the economy, environmental protection and good design.

24. With the exception of sites in smaller villages in South Norfolk (see below), the Draft GNLP Sites document details the proposed sites for growth. This includes those that have already been identified which are being carried forward, together with new ones.

25. In South Norfolk there are more villages clustered around more primary schools. South Norfolk Council therefore intend to prepare a separate village clusters plan covering new sites for small-scale housing in the rural parishes that collectively form primary school clusters. The Council aims to progress this South Norfolk Village Clusters Housing Site Allocations document as quickly as possible. This GNLP strategy identifies that sites for a minimum of 1,200 additional homes on top of existing commitment of 1,349 homes will be allocated in the South Norfolk plan.

26. The GNLP should be read as a whole in considering development proposals.

27. All policies in the GNLP Strategy and Sites document are strategic[5]. This means that the GNLP policies provide the strategic background for:
    a. existing local plan policies;
    b. future revisions to local plan documents and
    c. policies and proposals in Neighbourhood Plans, which should be in conformity with the GNLP.

[4] This draft plan identifies which other plans will be superseded by the GNLP. The publication (Regulation 19) version of the plan will identify any other policies in retained plans which will be superseded by the GNLP.

[5] This is in line with National Planning Policy Framework paragraph 23. Neighbourhood Plans can also allocate sites.

Consultation Questions for Section 1 – Introduction

1. Please comment on or highlight any inaccuracies within the introduction.
2. Is the overall purpose of this draft plan clear?

SECTION 2 GREATER NORWICH SPATIAL PROFILE

Introduction

28. This spatial profile outlines the main social, economic, and environmental issues in Greater Norwich which provide the context for development in the local plan.

Population

29. The estimated total population[6] of the three districts in 2018 was 406,000. Of this, 55% of the population live in the Norwich urban area[7], with around 10% living in the market towns of Aylsham, Diss, Long Stratton, Harleston and Wymondham. Around 35% of the population live in smaller towns and villages.

30. Parishes close to the city have a strong relationship with Norwich, while parts of the area look to the network of towns and larger villages to meet every-day needs and provide employment.

Table 1 - Population of the largest settlements in Greater Norwich, 2011[8]

Settlement	Population 2011 census
Norwich urban area	213,166
Wymondham	14,405
Diss	7,572
Aylsham	6,016
Hethersett	5,691
Poringland (including Framingham Earl)	4,826
Harleston	4,641
Long Stratton	4,425
Horsford	4,163
Brundall	4,019
Blofield	3,316
Acle	2,824
Reepham	2,709
Hingham	2,367
Loddon and Chedgrave	2,284
Wroxham	1,502

31. Long term trends underpin the need for the GNLP to plan for continued population growth. The numbers of people living in Greater Norwich rose steadily from 351,000 in 2001 to 381,000 in 2011[9]. This was due to both natural increase, such as people living longer, and people moving into the area, largely from elsewhere in the UK.

32. Further estimates shown in the graph below suggest that this increase will continue in the years up to 2038, rising from around 406,000 in 2018 to around 452,000 by 2038[10].

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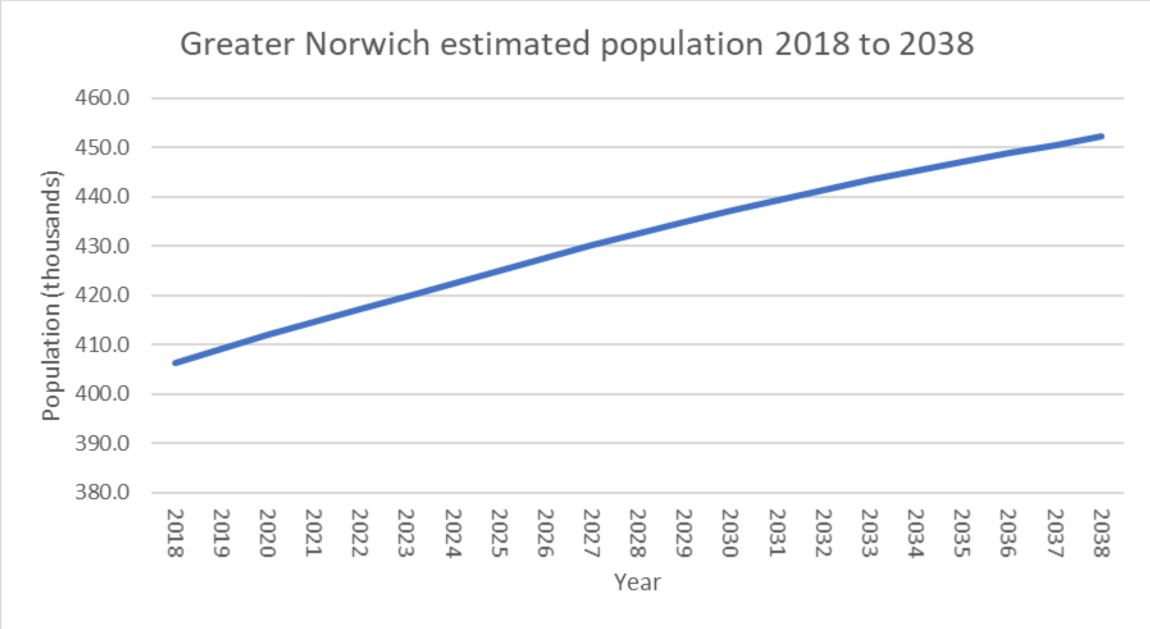
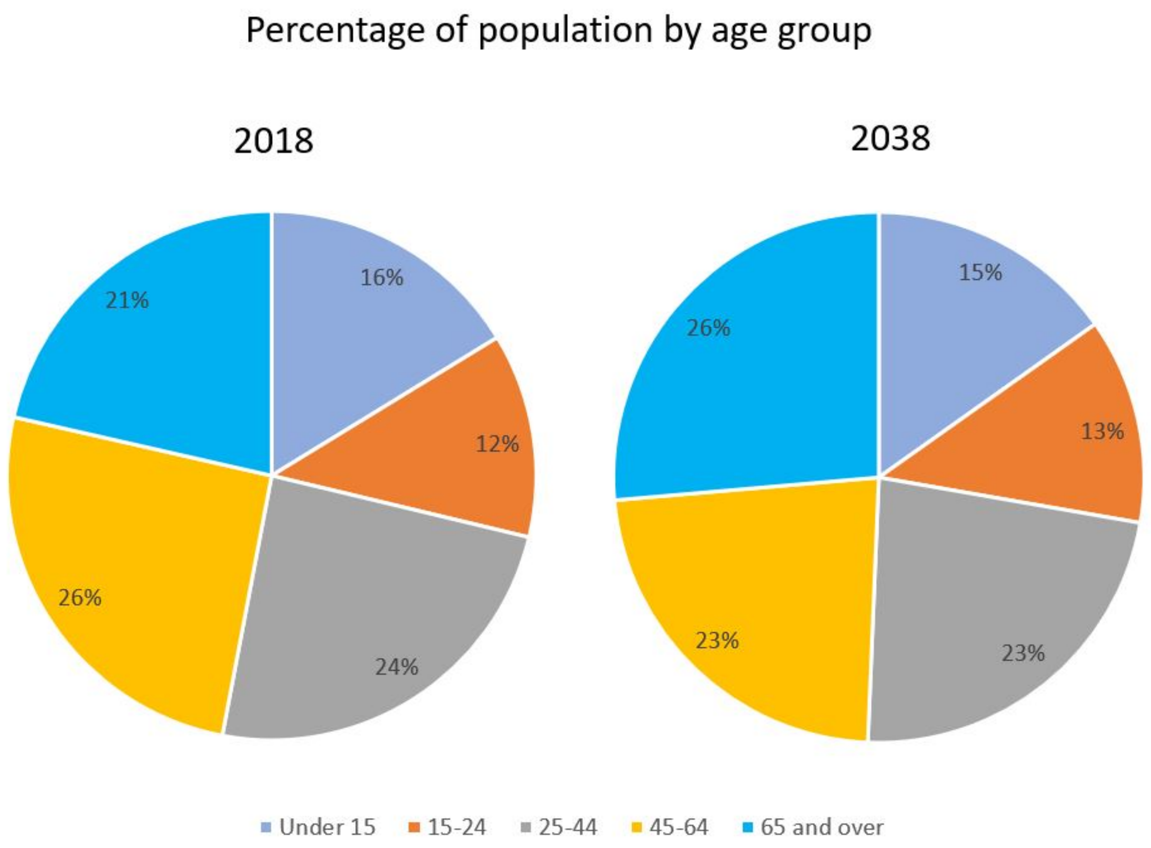
[6] ONS 2016 based sub-national population projections
[7] The Norwich urban area is Norwich and the built up parts of the fringe parishes of Colney, Costessey, Cringleford, Drayton, Easton, Hellesdon, Old Catton, Sprowston, Taverham, Thorpe St. Andrew, Trowse and the remainder of the Growth Triangle.
[8] ONS census 2011 from https://www.nomisweb.co.uk/reports/localarea
[9] Census data as above
[10] ONS 2016 based sub-national population projections



The population mix

33. The population of Greater Norwich has relatively high proportions of older people compared to national figures and this pattern is set to increase to 2038 as shown in the charts below[11]. Broadland and South Norfolk have proportions of older people significantly above the national average. Further growth of the older population will add to already significant pressure on residential and home care services, so it is important that the GNLP plans for changing housing needs.

[11] Source ONS 2016 projections as above



34. Birth rates have declined in recent years, both locally and nationally. The birth rate in Greater Norwich fell from 11.3 in 2011 to 9.6 in 2018[12] reflecting the national pattern. The birth rate in England and Wales in 2018 was the lowest ever recorded.

35. However, there are higher than average proportions of young adults in Norwich and the pie charts above show that this trend is set to continue. This is largely due to the high and growing student population. Graduate retention in our area is good. But demographic changes mean more and more older people will be supported by fewer people of working age, therefore it is important that the plan helps to keep young people in our area by assisting in providing suitable jobs and housing.

36. While the overall proportion of minority ethnic residents is relatively low, there was a significant increase from 1.8% in the Greater Norwich area in 2001 to 4.8% in 2011. This increase is particularly relevant to Norwich, which saw an increase from 3.2% in 2001 to 9.3% in 2011.

Health and wellbeing

37. The health of people in Broadland and South Norfolk is generally better than the national average, but in Norwich it is markedly worse. There is also marked variation within the city itself with life expectancy being 10.9 years lower for men in the most deprived areas than in the least deprived[13].

38. There are higher crime levels in inner urban wards, particularly in areas with a concentration of late-night drinking establishments. Overall, according to ONS data for 2019[14] , crime rates in

[12] Source ONS – the birth rate is the number of live births per year per thousand people
[13] Index of Multiple Deprivation (IMD)
[14] https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/policeforceareadatatables

Norfolk police force area remain relatively low (10th out of 43 for crime rate[15]). Statistics relating to knife crime show Norfolk to be amongst the lowest in the country (9th lowest out of 43). However, Norwich experienced an increase in knife crime between 2016-18 to a rate of 10 per 10,000 people, compared to 1.1 per 10,000 in both Broadland and South Norfolk[16].

39. Statistics relating to drug related crime show Norfolk to be 25th out of police 43 areas in England and Wales in 2019. Research[17] found that Norfolk is the top county affected by London individuals linked (or suspected to be linked) to County Lines, with Norwich listed as the most prominent city.

40. It is important that the local plan ensures that new development is designed to minimise crime.

Housing

41. This GNLP needs to plan for additional housing needs above and beyond existing commitments based on the most up-to date evidence. Several factors are driving this increase in the need for housing including rising population levels, an increase in the number of older people and a limited supply of housing over much of the last decade.

42. Across Greater Norwich there is a shortage of housing across all tenures. Overall delivery of housing from 2008-14 was at approximately 70% of the target, compared to a national delivery rate of 60%[18].

43. Between adoption of the JCS in 2011 and 2019, 87% of the housing target has been delivered. Whilst housing completions were well below target in the early years of the Joint Core Strategy (JCS) plan period, there was a generally a steady annual increase in completions, and delivery was around and above the JCS annual target in the most recent years (see housing completions graph below). This increase in delivery is reflected in the fact that the Government's Housing Delivery Test in 2019 shows that Greater Norwich delivered 133% of the number of homes required between 2015/16 and 2017/18.

44. In 2018 Greater Norwich had a five-year housing supply, including the 5% buffer required by the NPPF.

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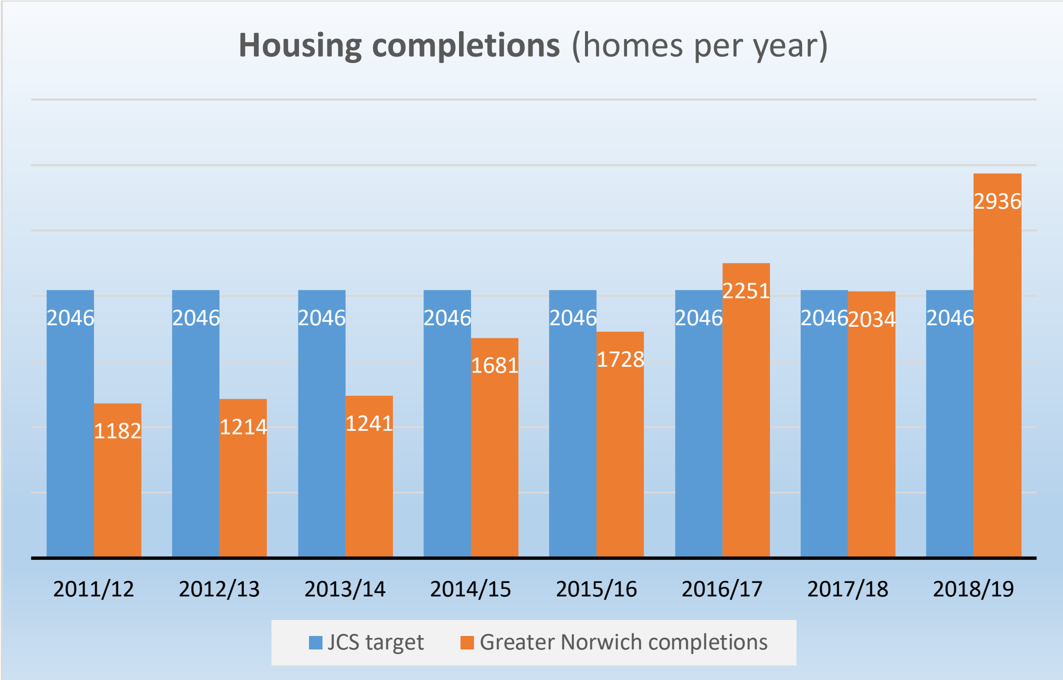
[15] Official UK Crime Rate (CR) statistic, CR is best understood in totality as "Crimes per 1,000 resident people as per the latest official Census over a selected time period"

[16] Norwich: https://ukcrimestats.com/Subdivisions/DIS/6759/
Broadland: https://ukcrimestats.com/Subdivisions/DIS/6553/
South Norfolk: https://ukcrimestats.com/Subdivisions/DIS/6724/

[17] The research was carried out by the Mayor of London and published in the document: "Rescue and Response County Lines Project – Supporting young Londoners affected by county lines exploitation – Strategic Assessment (August) 2019 "
[18] Source: Greater Norwich Annual Monitoring Reports



45. Part of the reason for the increase in housing delivery in 2018/19 is that changes in Government policy have allowed new purpose-built student accommodation delivery to be included in the housing figures at a rate of 1 home per 2.5 student bedrooms. 250 new student bedrooms were delivered in 2018/19, the equivalent of 100 new homes[19]. This reflects a growing trend in recent years for new student accommodation development, particularly at the University of East Anglia (UEA) and in the city centre. As the UEA and the Norwich University of the Arts (NUA) expand further and some students seek better quality accommodation, this trend is expected to continue to 2038.

46. The contribution from housing delivered through change-of-use has also increased in recent years. A significant proportion of this has been delivered through permitted development, particularly through the conversion of offices in central Norwich. It is expected that this trend is likely to diminish over time as the supply of offices suitable for conversion is used up. Broadland and South Norfolk have had very low numbers of homes delivered through change of use.

23. Broadland and South Norfolk are dominated by owner-occupied housing, whilst Norwich has a much higher percentage of social rented and private rented properties (see table 2 below)[20]. The figures for owner occupation compare to a national figure of 63%. The area's tenure mix has changed since 2001, with falls in home ownership and social renting and corresponding rises in the percentage of private rented properties across all three districts, mirroring the national picture. This trend seems likely to continue.

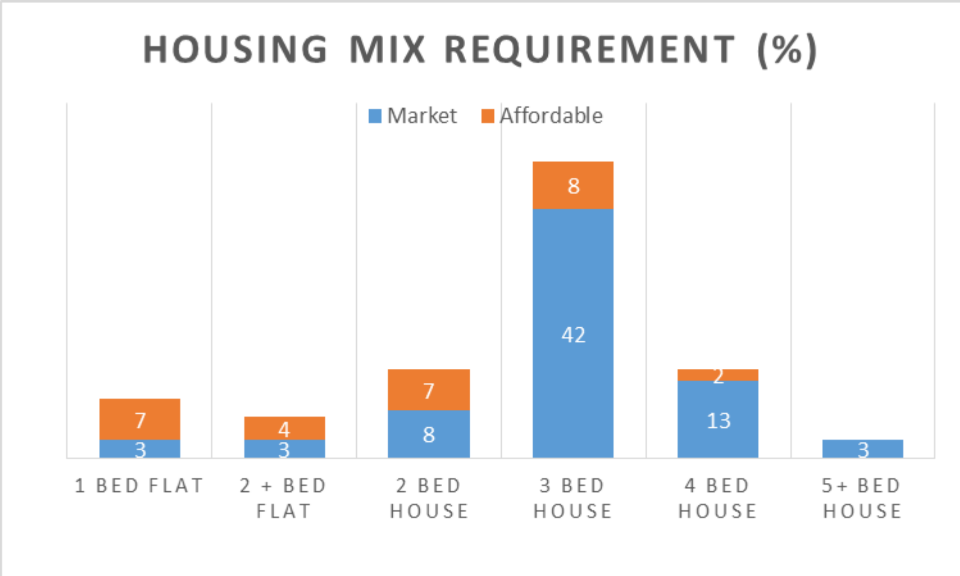
Table 2: Tenure mix of housing in Greater Norwich districts in 2018:

	Owner occupied	Private rented	Social rented
Broadland	79%	12%	9%
Norwich	39%	30%	31%
South Norfolk	76%	12%	12%

[19] Source: Data from forthcoming Greater Norwich Annual Monitoring Report 2018/19
[20] Source: Office for National Statistics

47. Housing affordability has worsened significantly in recent decades. In 2018, the property price to earnings ratio was 9.2 in Broadland, 7 in Norwich and 8.8 in South Norfolk, compared to a national average of 7.8[21]. Affordability is a major barrier to home ownership locally.

48. Local evidence[22] identifies that 28% of the housing required from 2015 to 2038 should be affordable housing. It also shows that the mix of housing tenures required differs by the type of home as illustrated in the graph below. The highest requirement is for three bed homes.



49. This plan seeks to address this by developing the required number of homes to meet this demand.

50. Due to the projected increase in the numbers of older people, local evidence in the Strategic Housing Market Assessment suggests that around 3,900 additional communal establishment places for over 75s will be required to 2038. The plan will need to have policies which specifically support the delivery of housing suitable for older people.

51. The provision of sites for Gypsies and Travellers consisted of 84 pitches in 2017. These are on large sites at Swanton Road (Norwich), Roundwell (Costessey) and Harford Bridge (Keswick), and on several small sites around the area. There are 55 plots for travelling show people at Hooper Lane in Norwich. There will be a need for some additional accommodation during the plan period.

52. There are some wards and more localised areas with high levels of deprivation in Norwich[23]. Although the surburban and rural parts of Greater Norwich are relatively affluent, there are pockets of deprivation elsewhere too. It is important that inclusive growth and regeneration is supported through the GNLP to help to reduce deprivation.

[21] Source: Office for National Statistics
[22] ORS Central Norfolk Strategic Housing Market Assessment (SHMA) 2017
[23] 2019 Index of Multiple Deprivation (IMD)

The economy

53. Greater Norwich is key to the region's economy with considerable potential for growth in world class knowledge intensive jobs (as shown in map 1 on page 18[24] below). Strategic employment sites and competitive land and business lets[25], mainly those in and around the Norwich and Wymondham area, support a globally significant growth axis within the Cambridge Norwich Tech Corridor[26].

54. The vibrant, attractive city centre of Norwich is a catalyst for economic growth across Greater Norwich, encouraging investment into the area. Market towns at Diss, Harleston and Aylsham and other local employment sites provide accessible employment for rural areas.

55. Between 2011-18 modelling[27] shows a 14.6% rise in total employment (29,100 jobs). This included notable increases in jobs in the accommodation and food sectors, IT and communications, professional, scientific and technical professions, education and health. However, employment in agriculture, manufacturing and insurance fell.

56. Greater Norwich also strongly features most of the sectors identified as having high growth potential regionally[28]. These include: advanced manufacturing and engineering at Hethel; agri-tech, health and life sciences at the Norwich Research Park (NRP) and the Food Enterprise Park; and IT and communications and digital creative industries in the city centre. Greater Norwich's other strengths include financial services, tourism, retail, media and the arts. The area also benefits from a strong and growing tertiary education sector provided by UEA, NUA, City College Norwich and Easton College which contribute research expertise and a skilled workforce.

Highlights of the Greater Norwich economy[29]

a. The life-science sector has a skilled workforce of 15,000 in the Norwich cluster and the Norwich Research Park is the UK's largest site for research in food, health and life sciences;
b. Agri-tech is a sector worth £3.6 billion and Easton College provides 5,000 students with training in the area which feed into the sector;
c. IT and communications and digital creative industries account for a sector worth £1.4 billion with over 100 companies in Norwich and a workforce of 7,500, including large numbers of graduates from the local universities;
d. The financial sector employs more than 11,500 people and contributes £1 billion to the local economy;
e. Greater Norwich boasts an extensive and varied leisure and culture offer. The tourism sector is worth £3billion and the visitor economy supports 54,000 skilled workers thanks to the growing number of day visitors, currently estimated at 40 million per year, and 12 million overnight visitors. Visitor attractions include a wide variety of historic buildings, parks and museums, cultural festivals and other regular events, along with access to the Broads and the coast. Sports and leisure facilities include numerous attractive open spaces and routes for walking and cycling, a dry ski slope, the only Olympic sized swimming pool in

[24] Source: Invest in Greater Norwich
[25] Source As above – On average, business lets are 45% cheaper in Greater Norwich than in London or Cambridge
[26] See https://www.techcorridor.co.uk/
[27] Source: Cambridge Econometrics: 'East of England Forecasting Model: 2016 baseline results'
[28] Sectors identified in the New Anglia Local Enterprise Partnership's Economic Strategy for Norfolk and Suffolk.
[29] Source: Invest in Greater Norwich

the region, leisure centres, Norwich City Football Club, theatres, cinemas, music venues and restaurants and bars;

f. Retail remains the largest provider of employment in the area. Norwich is rated as the 13th best performing retail centre nationally and our market towns also have a strong local retail offer.

57. In December 2013, the Greater Norwich City Deal was signed, which is building on the area's leading status in science, technology and advanced manufacturing and focusses on enterprise, skills and infrastructure.

58. Employment rates in Greater Norwich compares favourably to national trends, with rates of claimants for Jobs Seekers Allowance and Universal Credit below regional and national levels.[30]

59. Rural enterprises are important to the local economy and home working is increasing in significance. The proportion of micro-businesses employing up to nine people is above the national average in Broadland and South Norfolk. Signs are that new and small businesses can flourish and the survival rate of newly established enterprises is good[31].

60. The GNLP should support the growth of a wide ranging and changing economy, ranging from high tech businesses with the capacity for major growth through to smaller rural enterprises.

Overleaf – Map 1 The Cambridge Norwich Tech Corridor

[30] Source: https://www.norfolkinsight.org.uk/economy-and-employment/
[31] Source: ONS, Inter Departmental Business Register

CAMBRIDGE NORWICH TECH CORRIDOR

With over 20 science and research parks, a range of business parks and over 560HA of development sites for employment use, the Cambridge Norwich Tech Corridor offers a range of opportunities for businesses to grow and thrive.

OUR CLUSTERS:

- Agritech, Agrifood, Genetics & Bio Science
- IT, AI, Robotics, Digital, Sensors & Big data
- Advanced Engineering, Manufacturing & Materials
- Life Science, Medtech & Pharma

100KM OF OPPORTUNITY

OUR ASSETS:

- Advanced Engineering, Manufacturing & Materials
- IT, AI, Robotics, Digital, Sensors & Big data
- Agritech, Agrifood, Genetics & Bio Science
- Life Science, Medtech & Pharma
- Education
- Energy
- Enterprise Zones

Education and social mobility

61. Whilst tertiary education plays an important role in supporting a growing economy (see paragraph 55), in more deprived parts of the area educational attainment is low. Norwich has slightly lower than the national average percentage of people educated to NVQ4 level[32] (first year of degree level) and above the Norfolk and national average level of 16-17-year olds not in education, employment or training (NEETs)[33] at 9.2%. Norwich also performs particularly poorly for social mobility[34] with an overall ranking of 294th out of 324 local authority areas in 2017.

62. The picture for education and social mobility in Broadland and South Norfolk is generally better. Broadland has the lowest levels of 16-18-year olds who are NEET in the country at 3.3%, above the national average of residents educated to NVQ4 level, and higher levels of social mobility ranked at 93rd. South Norfolk has 3.9% of 16 to 18-year olds who are NEET, is ranked 152nd in the social mobility index, but has lower than national average figures for percentage of the population educated to NVQ4 level.

63. The GNLP will need to plan for inclusive growth to help to address social mobility and educational attainment issues.

64. As of May 2019, there are 24 secondary and 149 primary schools in Greater Norwich. The GNLP will need to make provision for additional schools and school places to serve growth.

Infrastructure

65. Historically relatively poor strategic infrastructure links limited growth in the area. But recent and planned infrastructure improvements are set to assist growth (see map 2 below and the Key Diagram).

The road network

66. The A11 corridor is a major focus of growth, with the route providing key strategic access to London, Cambridge and much of the rest of the UK via the M11 and A14. Dualling was completed in 2014 and the Cambridge Norwich Tech Corridor initiative aims to take advantage of this to boost economic development.

67. The main east-west road link is the A47. It connects the area to Great Yarmouth and Lowestoft to the east. Both are coastal resorts and industrial towns with significant regeneration needs. The development of Eastport at Great Yarmouth provides improved access to continental Europe and for offshore industries. To the west the A47 provides access to the Midlands, the North and to growth areas locally at Dereham and King's Lynn.

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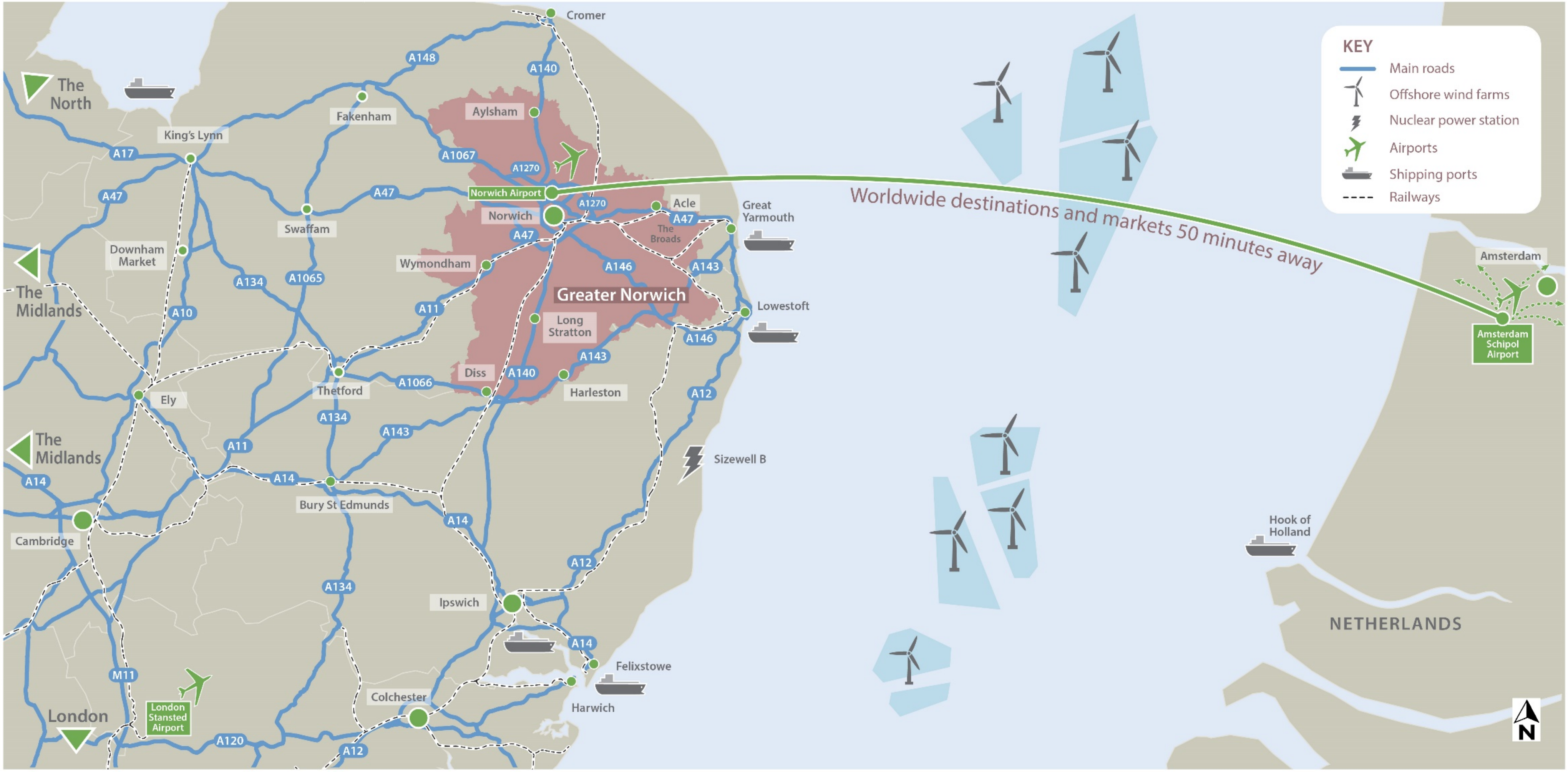
[32] Source: Nomis Norwich has 38.5% of its population educated to NVQ4 level and above, Broadland 39.7% and South Norfolk 36.9%. The Great Britain figure is 39.3%.

[33] Source: Government NEET statistics

[34] Source: Social Mobility and Child Poverty Commission, Jan 2016

Map 2 Greater Norwich main transport links



68. Full dualling of the A47 route is promoted through the A47 Alliance, which brings together the business community, local authorities, MPs and stakeholders along the whole of the trunk road route between Peterborough and Lowestoft. The Government's Roads Investment Strategy has identified further improvements within the Greater Norwich area at Blofield to North Burlingham, Thickthorn, and Easton to East Tuddenham. These are scheduled to start in 2021/22, 2020/21 and 2021/22 respectively. This will benefit growth in the GNLP area by improving connectivity.

69. Greater Norwich also includes two routes which form part of the government's Major Road Network (MRN) - local non-trunk roads of national importance. Within the Greater Norwich area, this includes the A140 both north and south of Norwich (including the A1270 Broadland Northway, also known as the Norwich Northern Distributor Road) and the A146 connecting Norwich to Lowestoft. The MRN announcement also includes a fund for improvements which can be bid into.

70. To the south, the A140 provides access to Ipswich and London and to Bury St. Edmunds and Cambridge from the south of the area. It also provides local links to Diss and Harleston and is almost entirely single carriageway. To ease congestion through Long Stratton, a bypass is planned to be delivered alongside 1,800 new homes. A bid for MRN funding to support delivery of the Long Stratton bypass is being developed.

71. The A1270 Broadland Northway was opened in 2018. It has reduced congestion through the north of Norwich and improved access to the airport, coast and Broads. Related improvements to public transport in Norwich are an integral part of the scheme. A preferred option to extend the road with a "Western Link" between the A1270 and the A47 has also been identified.

The rail network

72. The main rail services to and from Norwich provide direct access to Wymondham, Ely, Cambridge, the Midlands and the North and to Diss, Ipswich and London. Improvements including faster services to London and direct services to Stansted have been delivered or are planned. The East-West rail route linking directly to major growth areas around Milton Keynes and Oxford is a long-term aspiration.

73. The Bittern and Wherry Lines provide local rail links and options for commuting from areas such as Great Yarmouth, Lowestoft, Brundall, Acle, North Walsham, Cromer and Sheringham. Many of the improvements will be delivered through the new Greater Anglia franchise which started in August 2019.

Airports and ports

74. Norwich Airport is a catalyst for economic growth and has seen an increase in passenger numbers in recent years. As well as the key scheduled service to Schiphol (Amsterdam) which provides a hub for links to over 1,000 international destinations, there is significant business from offshore industries and domestic flights. Other principal international connections are via Stansted Airport and ports at Felixstowe and Harwich. These ports are the gateway to exports of goods worth £2.9bn every year.

The cycle network

75. Norwich is in the top five districts in the country for cycle use and recent monitoring conducted in the Norwich urban area[35] showed that there has been a 40% increase in cycling since 2013.

76. There is a relatively good network of cycle routes linking settlements within Greater Norwich, including the Marriott's Way, which links the city to Reepham and Aylsham. Significant grant funding has been secured to improve the cycle network in and around the city, linking the Norwich Research Park and the city centre to the North-East Growth Triangle in Broadland, and to invest in other routes including between Wymondham, Norwich and Sprowston.

Transport for Norwich and the Transforming Cities programme

77. Norwich has also been successful in securing a place in the Government 's Transforming Cities programme which has the potential to bring significant investment to the transport networks in the city and surrounding areas. £6.1 million was secured from the fund in early 2019 and bids are being made for further funding. The programme seeks to promote modal shift away from use of the private car in a time of rapidly changing vehicle technologies. Evidence of such a shift was already seen after First Eastern Counties reported a 375,000 increase in Norwich bus journeys in 2015 following the completion of Transport for Norwich changes to improve accessibility to the city centre for buses.

78. The Transport for Norwich review will guide future transport policy and investment in and around the city. The network will continue to be developed to promote public transport use in growth areas such as Wymondham, the airport and Broadland Business Park. This will include the Park-and Ride network around Norwich which, with 6 sites, forms one of the most comprehensive networks in the country and is well-connected to other bus routes.

79. Transport improvements outside of the Transport for Norwich area are dealt with on a local basis. For example, Norfolk County Council has commenced a programme of Market Town Network Improvement Strategies (NIS). The Connecting Norfolk initiative also promotes increasing use of demand responsive transport services and car sharing in rural areas.

Digital infrastructure

80. There is variable access to high speed broadband and mobile phone connectivity can be poor, particularly in rural areas. To help address this, the Better Broadband for Norfolk programme is a partnership funded through Norfolk County Council. It aims to make high-speed broadband available to more than 95% of Norfolk's premises by spring 2020. The next generation of mobile phone networks will be 5G, and the rollout is expected to commence in 2020.

Emissions and climate change

81. Mitigating the effects of climate change within the Greater Norwich area is a cornerstone of the GNLP. This section looks at current activity around measuring air quality as well as future trends in emissions, rainfall and flooding levels.

[35] Source: Norfolk County Council

82. There is an Air Quality Management Area (AQMA) which covers the whole of the city centre. Improvements in air quality are being achieved by promoting public transport use and other initiatives, including encouraging active travel (walking and cycling). However, this remains an important issue with more work to be done.

83. Per capita carbon dioxide (CO_2) emissions, at 5.1 tonnes CO_2 equivalent per year, are below the national average (5.3 tonnes CO_2 equivalent). In recent years, they have declined in line with regional trends and slightly slower than national trends[36]. However, they are above the national average in rural parts of the area, partly due to a greater reliance on car journeys.

84. Research by the world-leading UEA[37] shows how our climate will change in the East of England up to 2040 with higher temperatures, less rain in summer and wetter winters. It indicates:

- An increase in mean summer temperature of 1.2°C to 1.6°C
- An increase in mean winter temperature of 1.0°C to 1.3°C
- A decrease in mean summer precipitation of 1% to 13%
- An increase in mean winter precipitation of 5% to 8%.

85. Policies in the GNLP will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate.

Flood Risk

86. The main inhabited area at risk of fluvial (river) flooding in Greater Norwich is in the Wensum valley covering parts of central Norwich (see map 3 below).

87. There are small scale flood defences across Greater Norwich with more extensive defences by the River Wensum within The Close area of central Norwich and on the River Bure at Buxton. There are also flood defences within the neighbouring Broads Authority planning area, with an extensive programme of improvements being implemented within the Broads[38].

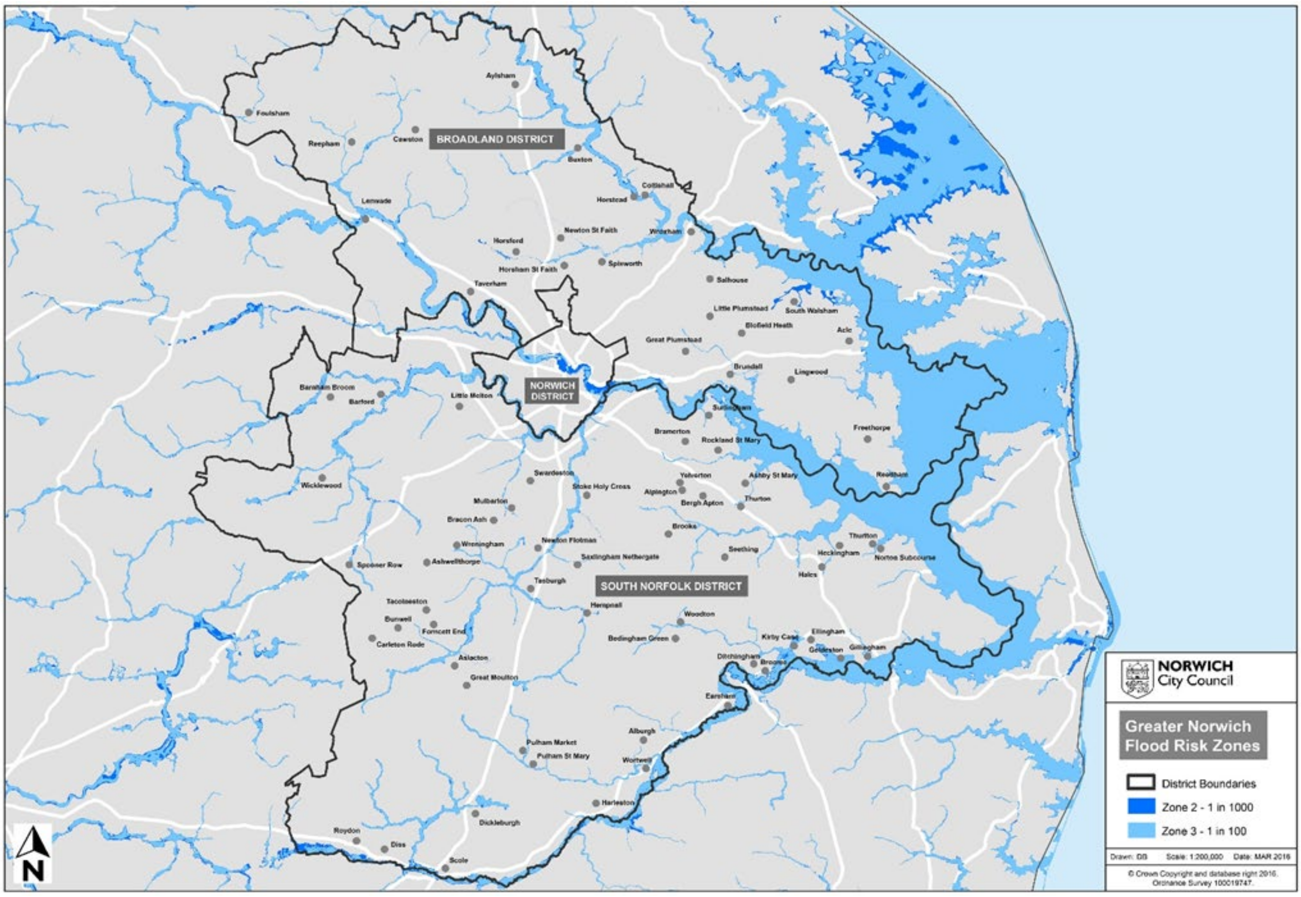
88. Whilst the great majority of development in recent years has been away from areas of flood risk from rivers, recent development on brownfield sites to provide urban regeneration adjacent to the River Wensum in Norwich has been designed to withstand flood.

89. Measures to address surface water flood risk in areas at the greatest risk, including parts of Norwich and Drayton, have included maintenance of drainage systems, the introduction of detailed development management policies covering such areas and funding bids for mitigation works.

90. This plan will need to provide strategic level policies to address flood risk in new development, locating development the great majority of development away from areas at risk of flood.

[36] Source: Department for Business, Energy and Industrial Strategy Between 2005 and 2017, Greater Norwich emissions fell by 35%, East of England emissions by 35% and UK emissions by 39%.
[37] Source: Scoping Report for the New Anglia LEP Climate Change and Adaptation and Carbon Reduction Action Plan (July 2019)
[38] Source: Greater Norwich Area Strategic Flood Risk Assessment

Map 3 Environment Agency fluvial flood risk zones 2 and 3



Renewable Energy

91. Recent years have seen an increase in renewable energy generation locally, chiefly from solar power (both small and large-scale), with some wind and biomass developments. Our plan should support further development of decentralised, renewable and low carbon sources of energy.

Environmental assets

The built and historic environment

92. Greater Norwich has a rich concentration of historic assets. At its core is the City of Norwich, formerly England's second city, with its two cathedrals and many other historic buildings, including the greatest number of medieval churches in northern Europe, monastic halls, former merchants' houses, the city wall and industrial heritage.

93. The city is linked to a hinterland of settlements which also have a rich heritage reflecting the area's relative prosperity and high density of settlement through history, particularly prior to the industrial revolution.

94. Market towns, villages and hamlets show a pattern of development that has built up over the centuries, with a wealth of medieval churches, including a number of round tower churches, farmsteads and historic halls. A number of areas of formal parkland, such as those at Raveningham and Blickling Halls, are designated by Historic England.

95. In total, there are around 5,800 listed buildings and 90 conservation areas. Ancient monuments and significant archaeological potential add a further layer to this historic character.

Table 3 – Numbers of Conservation Areas, Listed Buildings, Ancient Monuments and Historic Parks

Feature	Norwich	Broadland	South Norfolk	Greater Norwich
Conservation Areas	17	21	52	**90**
Listed Buildings	1,500	980	3,310	**5,790**
Ancient Monuments	25	22	38	**85**
Historic Parks & Gardens (Historic England)	9	5	7	**21**
Historic Parks & Gardens (locally listed)	10	18	17	**45**

The natural environment

96. Greater Norwich has and neighbours a wealth of natural environmental assets designated for both habitat and species protection. Many of these are marshland, rivers or broads of international and national status classified as Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites for wetland importance. The internationally protected “Natura 2000” sites subject to the Habitats Regulations in the Broads and elsewhere in Norfolk, including on the coast, could potentially be affected by growth in Greater Norwich (see map 4 below).

97. Water quality is a major issue for the sensitive wetland habitats and dealing with pollution brings particular challenges. Increased pressure from housing growth within Greater Norwich combined with an increase in already high visitor numbers may also have potentially negative impacts on some sites. The GNLP must ensure that development does not have a negative impact on internationally designated sites.

98. SACs in Greater Norwich itself include the Wensum chalk river valley and valleys and fens at Booton Common and Buxton Heath. There are also 45 nationally important Sites of Special Scientific Interest (SSSIs) designated for their biodiversity and geodiversity value. Pinebanks Pits in Thorpe St Andrew and Catton Chalk Pits are examples of sites designated for their geodiversity value.

99. In addition, Greater Norwich has large numbers of locally protected sites. There were 447 County Wildlife Sites covering around 4,700 hectares of land in 2018. Sites include valleys, meadows and wetlands, such as parts of the Bure, Waveney and Yare valleys, heaths such as Mousehold, grasslands including commons such as those at Hapton, Mulbarton and Salle, and an extensive network of hedgerows and woodlands spread across the area.

Map 4 - Major Habitat Sites in Norfolk

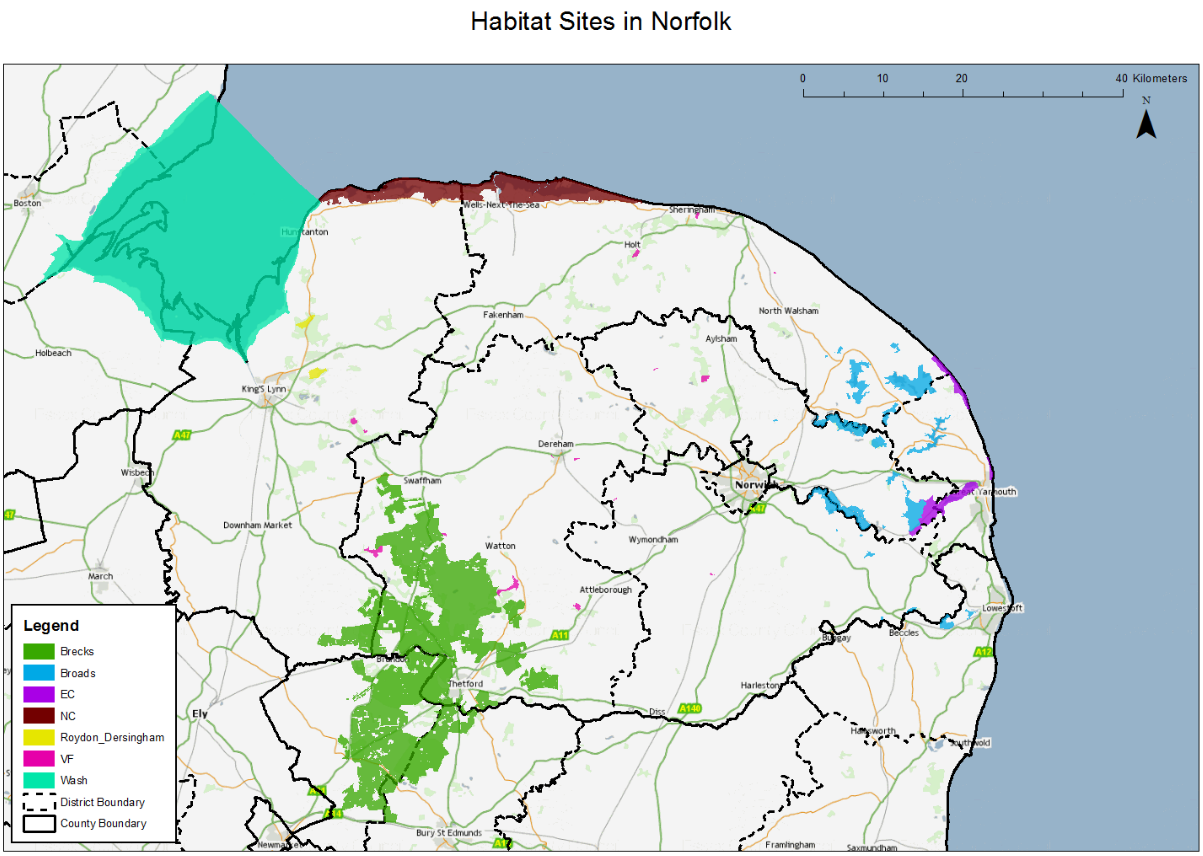


Table 4 - Numbers of and internationally, nationally and locally designated nature conservation sites, 2015[39]

Feature	*Greater Norwich*
Special Areas of Conservation	3
Special Protection Areas	2
Ramsar Sites	2
Sites of Special Scientific Interest	45
National Nature Reserves	2
Local Nature Reserves	18
Roadside Nature Reserves	52
County Wildlife Sites	428

100. Long-term work is ongoing to improve and expand the green infrastructure network throughout Greater Norwich and beyond. As our area is located adjacent to the Broads and other areas of national and international importance, the aim is to provide sufficient high quality green spaces to provide biodiversity buffer zones, promote active leisure and travel and provide alternative destinations to help manage visitor pressure on biodiversity.

[39] Sources: Norfolk Biodiversity Information Service and Natural England. Some sites have several designations, so will be counted more than once in the table.

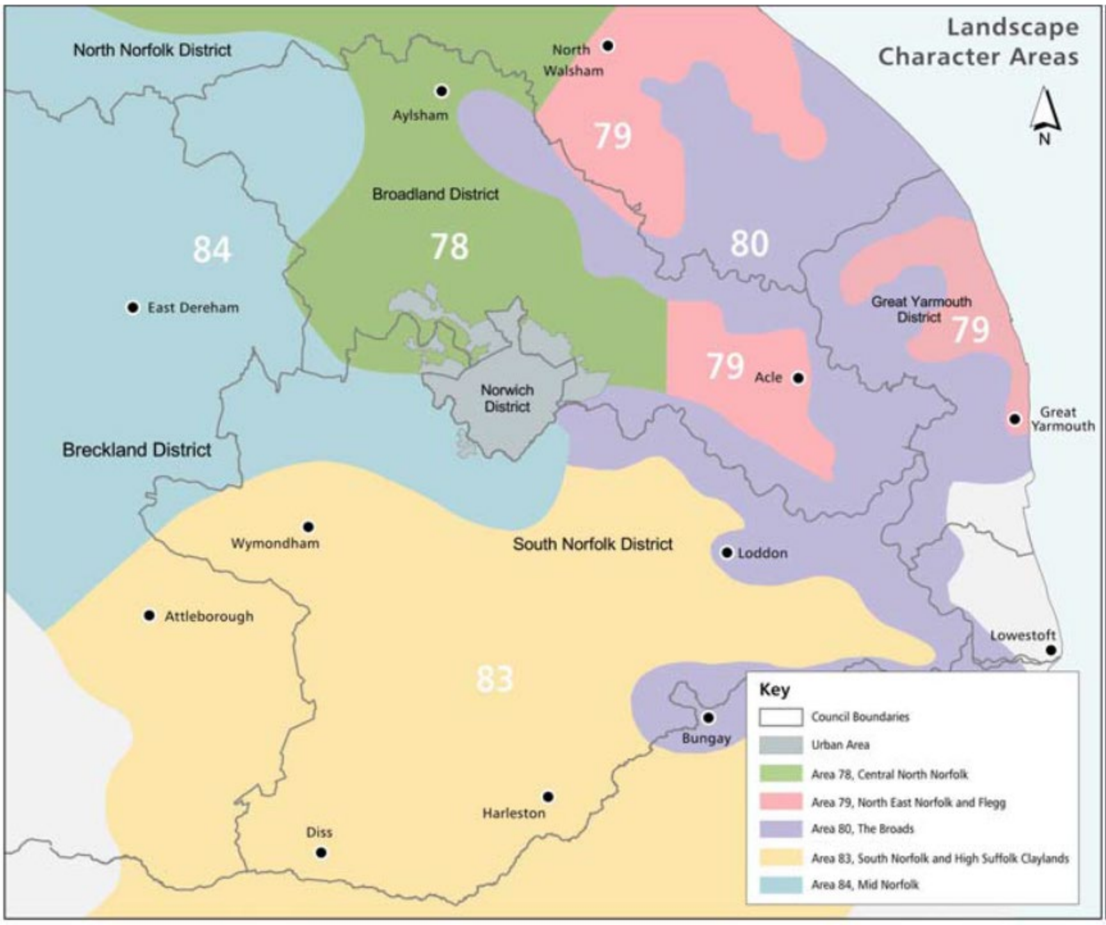
101. Parks and other types of open space also play an important role in providing a network of locally accessible green and urban spaces.

Landscape

102. The varied landscape character areas[40] in and adjacent to Greater Norwich area consist of: the fens and marshes of the Broads to the east of Greater Norwich (area 80 on map 5 below); a more intimate landscape of small fields and hedgerows adjacent to the Broads, also in the east (area 79); rolling landscapes of varied geology including woodland, heath and former parkland estates in the west and north (areas 84 and 78) and an extensive open clay plateau in the south (area 83).

103. These nationally identified landscape charcter areas inform local landscape character studies. Greater Norwich does not have a nationally designated Green Belt. National policy is clear that new Green Belts should very rarely be established. Therefore this plan will need to carry forward policies for protecting our valued landscapes

Map 5 - Natural England Landscape Character Areas

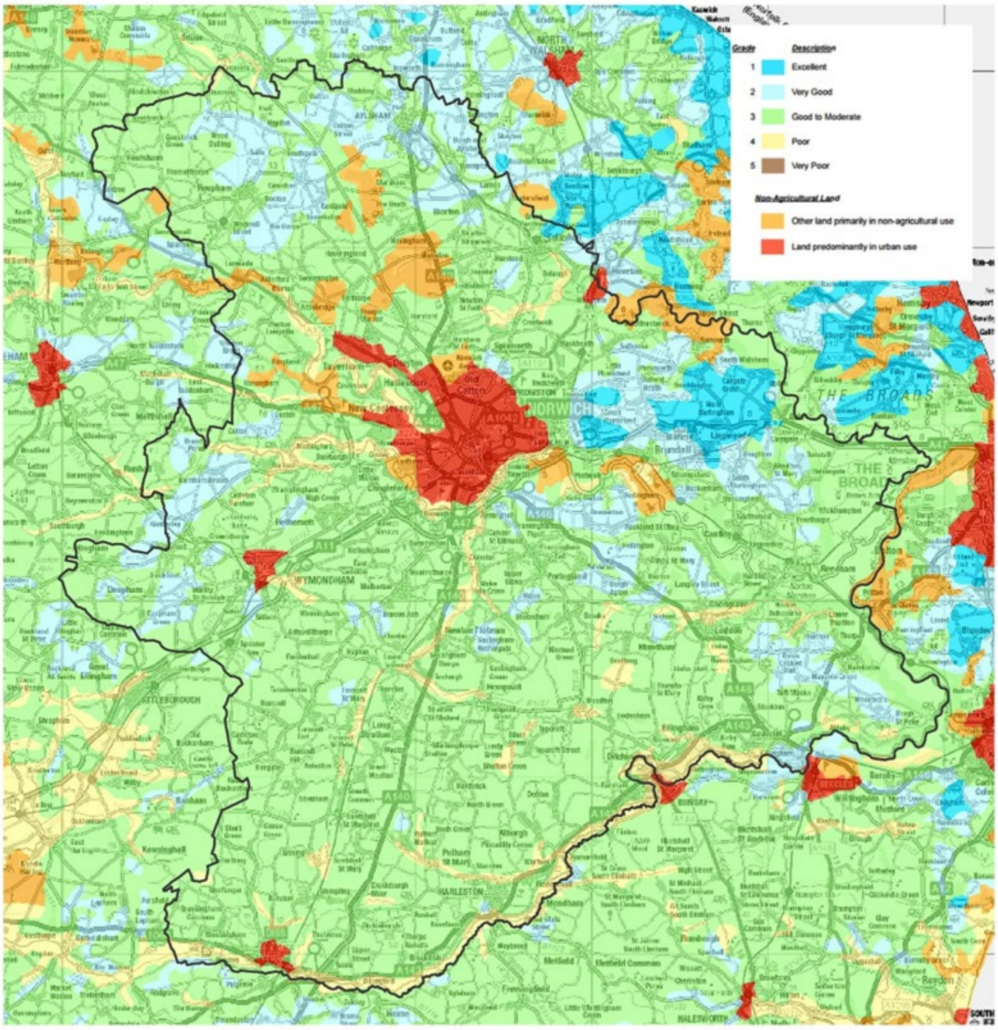


40 Natural England, Natural Character Area profiles 2014

Soils

104. Large tracts of rural Greater Norwich are valuable for their agricultural land. As map 6 below shows, a high proportion of Greater Norwich's agricultural land is of high quality (grades 1-3), with the majority of the most valuable land being located between Norwich and Acle[41] . Protecting high quality soils remains important both for supporting agriculture and shaping our rural landscape character.

Map 6 - Agricultural land grading in Greater Norwich



Water

105. Water is supplied in Greater Norwich from groundwater sources and from the River Wensum.

106. Relatively low rainfall totals and extensive agricultural water use demand mean that the whole area is defined as suffering from serious water stress[42]. Local planning policy and water company strategy[43] place a focus on promoting water efficiency.

[41] Note: The map is indicative as it does not break down category 3 into a and b classes
[42] Water Stressed areas– final classification, Environment Agency 2013
[43] Anglian Water - Anglian Water Revised Draft Water Resources Management Plan 2019

Consultation Questions for Section 2 – Greater Norwich Spatial Profile

3. Please comment on or highlight any inaccuracies within the spatial profile?
4. Are there any topics which have not been covered that you believe should have been?
5. Is there anything that you feel needs further explanation, clarification or reference?

SECTION 3 - THE VISION AND OBJECTIVES FOR GREATER NORWICH

107. The vision and objectives below set out what the GNLP aims to achieve for Greater Norwich to 2038.

The Vision for Greater Norwich in 2038

108. By promoting this Greater Norwich Local Plan our aim is that it will support growth of a diverse low carbon economy which will compete globally through its world class knowledge-intensive jobs in the Cambridge Norwich Tech Corridor.

109. As a result, by 2038 Greater Norwich will have vibrant, healthy, inclusive and growing communities supported by the delivery of new homes, infrastructure and an enhanced environment. Growth will make the best of Greater Norwich's distinct built, natural and historic assets.

110. To achieve this, growth will be clean and resource efficient, with significantly reduced emissions to ensure that Greater Norwich plays a full part in meeting national commitments on tackling climate change and is moving towards a post-carbon economy. The focus on three high growth sectors: clean energy, agri-food and ICT/digital, along with the high environmental standards and significant further improvements to our extensive green infrastructure network promoted through this plan, will support Norfolk and Suffolk as the UK's clean growth region.

Economy

111. Generating the right levels of growth in the right places will help our local economy by stimulating economic investment, new infrastructure, new technologies and environmental improvements. This will improve access across Greater Norwich to services and jobs, and lead to better environmental quality.

112. Our plan will stimulate the creation of a strong, enterprising, productive and broad-based economy, and the growth of a wide range of economic sectors, supported by an increasingly skilled workforce. We will see a focus on our local strengths in knowledge intensive sectors. This will include significant growth in digital creative industries in the city centre and in health, life sciences, agri- and bio-technology at the Norwich Research Park and the Food Enterprise Park at Honingham, along with advanced manufacturing and engineering at Hethel. This clean growth will place Greater Norwich at the forefront of tackling the challenges and opportunities of climate change. Together these will strengthen our leading role nationally and internationally in these sectors which will be critical to moving towards the post-carbon economy.

113. Most of the jobs growth we expect to see will have been delivered on strategic sites in and around Norwich with good access to public transport, the major road network and a comprehensive cycling network. This will have contributed to the growing national importance of the Cambridge Norwich Tech Corridor and strengthened Norwich's role as the regional capital.

114. The city centre will continue to play a significant role as the economic dynamo of the area 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.

115. Parallel to this, the role of smaller scale employment sites elsewhere in the urban area, market towns and villages will help to deliver good access to jobs for all. New technologies and improved broadband and mobile phone infrastructure will also facilitate changes to the way we work, including the growth of small-scale businesses, more working from home and remote working.

Communities

116. The growth of mixed, inclusive, resilient and sustainable communities will mean that our new communities will be safe and attractive places to live. People of all ages will have good access to services and facilities including schools, health care, shops, leisure and community facilities and libraries – which will in turn reduce the need to travel. This will also help create communities in which people can interact socially, be independent and have the opportunity for healthy and active lifestyles. New technologies will provide more ways of travelling and accessing services and our new communities will be designed to make active travel and public transport the easiest travel choices.

Homes

117. High quality new homes will have been built to meet the growing and changing needs of Greater Norwich. There will be a variety of type, tenure and sizes of homes in the mixed and inclusive communities, catering for the needs of all and providing both market and affordable homes to meet different needs in our urban and rural areas.

118. Our plan envisages delivering the right number of homes to meet a variety of housing needs for those living and working in Greater Norwich. These include the rising ageing population, families and younger people, single occupants and those looking to share a home with others. The needs of groups in our community such as Gypsies and Travellers, Travelling Show People and those who live in residential caravans will have been provided for in accessible locations.

119. Most new homes will have been built in and around Norwich and in the Cambridge Norwich Tech Corridor. In Norwich city centre and other highly accessible and sustainable locations, higher density homes including flats will have been built, providing particularly for the needs of younger people and including purpose-built student accommodation, whilst also meeting the needs of other members of our community. This will have helped to create lively and vibrant city and district centres, enabling people to access services and jobs easily and to travel sustainably.

120. Our suburbs, towns and villages will also be vibrant places to live with good access to services and facilities, supported by new housing and jobs and changing technologies. Homes here will have been built at appropriate densities to respect and enhance local character and to meet the needs of all in mixed communities.

121. New homes needing planning permission will be large enough to provide a good quality of life, with adaptable homes built to meet the varied and changing needs of our communities. Many homes across Greater Norwich will also be custom-built.

Infrastructure

122. By 2038 our transport system will have been enhanced by a combination of infrastructure improvements and new technologies. Connectivity will improve both within Greater Norwich and to other parts of the country and beyond. This will include better rail services to London, Cambridge, Stansted, Milton Keynes, Oxford and the West, growth at Norwich International Airport, as well as road improvements to the A47, the Norwich Western Link and the A140.

123. Together these will provide greater travel choices and allow people to make the best use of evolving sustainable transport networks, particularly in the urban area. They will also continue to support Norwich's role as the regional capital and improve access to our rural areas.

124. The coming decades will see significant changes in how much and how people travel. This plan will help to reduce the impact of travel both by concentrating activities close to centres of population and by assisting an increase in home working. Combined with technological improvements including the addition of new and different transport infrastructure, emissions from transport consequently will be significantly reduced.

125. For journeys that are still needed there will have been a radical shift away from the use of the private car, with many people walking, cycling or using clean public transport. This will be especially evident in the Norwich urban area and the main towns with safe, attractive and well-designed routes for pedestrians and cyclists and fast, frequent and reliable public transport services. Electric vehicles will predominate throughout Greater Norwich and connected and autonomous vehicles (CAVs) will have become more commonplace, initially with taxis and shared demand responsive buses and ultimately for buses, deliveries and private vehicles.

126. In addition, the delivery of improved telecommunications, broadband and utilities infrastructure throughout the area will both support businesses development, home working, carbon reductions and access to services while also reducing transport emissions.

127. Existing schools and health facilities will have been expanded, and new facilities provided to serve growing communities.

Delivery

128. We will achieve our vision for sustainable and inclusive growth by a variety of means. These include our proactive approach to co-ordinating development providers, organisations and agencies as well as through interventions in cases where the market cannot deliver infrastructure. The protection and enhancement of a high-quality environment will also have assisted delivery by attracting inward investment. Our GNLP will meet housing need by providing choice and flexibility so that homes will have been delivered on allocated and windfall[44] housing sites.

[44] Windfall sites are those which gain planning permission without having been allocated in a local or neighbourhood plan

Environment

129. Greater efficiency in water and energy usage will have minimised the need for new infrastructure, and further reductions in carbon emissions will be delivered through the increased use of sustainable local energy sources. New water efficient buildings will have also contributed to the protection of our water resources and water quality, helping to ensure the protection of our rivers, the Broads and our other wetland habitats.

130. Air pollution levels will be reduced through a combination of better design and location of development, supported by technological changes. Improved air quality will mean that there will no longer be any Air Quality Management Areas in Greater Norwich.

131. This GNLP will protect and enhance the distinctive local characteristics of our city, towns and villages and their separate identities. This will be achieved by shaping high quality new development, making efficient use of brownfield sites and minimising the loss of greenfield land.

132. The development of a multi-functional green infrastructure network will continue across Greater Norwich. This enhanced network will have helped our communities mitigate and adapt to the effects of climate change, by providing for biodiversity gain through improved and linked habitats, reducing flood risk and improving opportunities for active travel and leisure. Improved access to the countryside will have been provided and the quality of our environmental assets will have been enhanced. Visitor pressure on the Broads and other internationally and nationally protected sites will be reduced by new and improved green infrastructure both on and linked to developments, including delivery of the North West Woodland Country Park in Horsford.

133. Critically, our plan will have helped to achieve reductions in our greenhouse gas emissions to contribute to the national zero emission target by 2050.

The plan's objectives

134. The wide-ranging vision for Greater Norwich above has helped us to establish the plan's objectives below. Together, the vision and objectives provide the context for the policies and monitoring indicators in this plan.

Economy

To support and promote clean growth and progress towards a post-carbon economy through the expansion of internationally important knowledge-based industries in the Cambridge Norwich Tech Corridor as part of an entrepreneurial, enterprising, creative and broad-based economy with high productivity and a skilled workforce.

Communities

To grow vibrant, healthy communities giving people a high quality of life in well-designed developments with good access to jobs, services and facilities, helping to close the gap between life chances in disadvantaged and other communities.

Homes

To enable delivery of high-quality homes of the right density, size, mix and tenure to meet people's needs throughout their lives and to make efficient use of land.

Infrastructure

To promote the timely delivery of infrastructure to support existing communities, growth and modal shift in transport use; and to improve connectivity to allow access to economic and social opportunities.

Delivery

To promote the delivery of housing, jobs and infrastructure to meet identified needs, supported by intervention mechanisms where the market is unable to deliver.

Environment

To protect and enhance the built, natural and historic environments, make best use of natural resources, and to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change and plays a full part in meeting national commitments to achieve net zero greenhouse gas emissions by 2050.

Consultation Questions for Section 3 – The Vision and Objectives for Greater Norwich

6. Do you support or object to the vision and objectives for Greater Norwich?
7. Are there any factors which have not been covered that you believe should have been?
8. Is there anything that you feel needs further explanation, clarification or reference?

SECTION 4 – THE DELIVERY OF GROWTH AND ADDRESSING CLIMATE CHANGE

135. To achieve this plan's visions and objectives it is essential that we deliver planned growth through an effective policy framework which will both help decarbonise development and assist in addressing climate change. The delivery and climate change statements below are not policies in themselves, but rather set out how the GNLP addresses these two key issues. These priorities are important in guiding the plan's strategy and content.

DELIVERY

136. The GNLP is part of a wider package of joined up measures the councils are taking to work with the Government, New Anglia LEP, the development industry and service and infrastructure providers to fund and deliver the high-quality growth Greater Norwich needs.

137. The councils also work in partnership as the Greater Norwich Growth Board (GNGB), which oversees decisions on investment in infrastructure to support growth and deliver existing planning targets.

138. The statement below sets out how the GNLP prioritises the delivery of development.

DELIVERY STATEMENT

Delivery of inclusive growth and sustainable development are key priorities for the Greater Norwich Local Plan. Delivery of housing, jobs and infrastructure are interlinked and mutually supportive.

Growth offers the opportunity to strengthen Greater Norwich's role as a key part of the national economy, with the Cambridge Norwich Tech Corridor becoming an increasingly important axis linking to two other nationally significant growth corridors, between London, Stansted and Cambridge and along the Cambridge - Milton Keynes - Oxford Arc.

The authorities will continue to work:

- **through the Greater Norwich Growth Board (or any successor) to facilitate and coordinate delivery across the plan area;**
- **With the private sector to promote the area and to overcome constraints on housing and employment sites.**

Each of the authorities have development companies directly delivering homes and jobs. The Greater Norwich Growth Board will continue to review options for joint Special Purpose Vehicles.

Housing

The plan promotes a pro-active approach to delivery through only allocating housing sites where a reasonable prospect of delivery, taking account of policy requirements in this plan, can be evidenced[45]. In addition, delivery plans are required to be submitted with planning applications to guide ongoing contact with developers. Where delivery cannot be demonstrated to be in accordance with agreed delivery plans for individual sites, the authorities will, as appropriate, make use of their legal powers to bring about strategically significant development, including compulsory purchase.

[45] **THE HOUSING ALLOCATIONS IN THIS DRAFT PLAN WILL ONLY BE CARIED FORWARD TO THE SUBMISSION VERSION OF THE PLAN IF EVIDENCE IS PRESENTED TO SHOW THAT THEY WILL BE DELIVERED BY 2038.**

This plan also provides choice and flexibility by ensuring there are enough committed sites to accommodate 9% more homes than "need", along with two "contingency" locations for growth, should they be required to offset any non-delivery. Additional opportunities will be provided, particularly for small scale growth at villages and on small brownfield sites across Greater Norwich, through windfall development.

Taken together, these measures will ensure that housing needs to 2038 will be fully met.

Economic development

To promote delivery of jobs, this plan provides choice and flexibility by providing for a wide range of type and size of employment sites. These include strategic sites capable of accommodating large scale development and high growth knowledge-intensive sectors. Most strategic sites are extensions of already successful developments. Norwich City Centre is the largest concentration of employment in Greater Norwich with potential to grow further and will be a focus of employment growth to support the delivery of housing and other development across the wider plan area. Smaller scale and rural employment sites are less likely to be constrained by infrastructure requirements and will be supported in accessible and sustainable locations. Together, these varied sites provide for growth of both a broad based and a high value knowledge economy.

Economic development is also supported by policies that promote housing delivery, infrastructure and a high-quality environment. Other activities of the partners promote inclusive economic development, inward investment and skills.

Infrastructure

Infrastructure priorities benefit existing communities, support growth, improve connectivity and access to economic and social opportunities, and deliver sustainable and active travel choices to promote modal shift.

The Greater Norwich partners will continue to work to coordinate delivery with other providers including Highways England, Anglian Water, other transport and utilities companies, town and parish councils and local health care providers. Infrastructure will be delivered through:

- **On-site and off-site provision required of development through conditions or legal agreements;**
- **Pooled use of the Community Infrastructure Levy[46], which is being reviewed alongside GNLP plan making;**
- **Maximising opportunities to access Government and other sources of funding;**
- **Capital investment of public bodies and utilities companies; and**
- **Locally led delivery vehicles.**

[46] CIL has been in operation in Greater Norwich since 2011. It has helped to deliver a wide range of projects including transport, green infrastructure leisure and community facilities. Examples include CIL funding in 2018 providing improved green spaces, a new pedestrian bridge linking Bowthorpe to the Norwich Research Park, self-access technology improvements in 8 libraries and a new artificial grass pitch in Wymondham.

ADDRESSING CLIMATE CHANGE

139. The National Planning Policy Framework requires local plans such as this one to "*Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts*" and to set strategic polices which address climate change mitigation and adaptation.

140. The climate change statement below sets out how the GNLP seizes the opportunities available locally to promote low carbon development and address climate change.

CLIMATE CHANGE STATEMENT

The way in which local plans such as this can support the transition to a post carbon future is set out in joint Royal Town Planning Institute (RTPI) and Town and Country Planning Association (TCPA) guidance[47]. Table 5 below shows how the measures the guidance identifies are addressed through the GNLP.

Table 5 GNLP coverage of climate change issues

Measure	GNLP coverage
Requiring the location and design of development to: **1. deliver the highest viable energy efficiency, including the use of decentralised energy;** **2. reduce the need to travel, particularly by private car;** **3. secure the highest possible share of trips made by sustainable travel.**	**Location of development: Policies 1 and 7** **The policies covering the location of development ensure that new housing will be close to every-day services and jobs. The great majority of the development is in urban areas and large villages, where sustainable access to services and jobs is best, thus reducing the need to travel and making it easier to walk, cycle and use public transport. Growth in villages is located where there is good access to services to support their retention. The distribution of the great majority of growth thus reduces the need to travel.**
	Design of development: Policies 1, 2, 3 and 4 **Policy 2, in conjunction with other plan policies, requires development to be designed to minimise emissions. It is a broad strategic policy covering a wide range of design issues which is supported by the requirement for a Sustainability Statement to show how development will be low carbon. It also provides flexibility in what will undoubtedly be an era of rapid technological change to 2038 to ensure development seizes the broad range of opportunities to be designed to reduce emissions.** **To achieve this, development must be designed to promote local service provision, include green infrastructure and reduce the need to travel. It must promote the use of public transport and active travel, along with supporting electric vehicle use.**

[47] Rising to the Climate Crisis - A Guide for Local Authorities on Planning for Climate Change (2018)

	The policy also requires development to be designed and orientated to minimise energy use, promote low carbon generation and energy and water efficiency, including using sustainable materials, promoting solar gain and reducing overheating. By setting high standards for resource efficiency the plan contributes to the Local Industrial Strategy[48] priority to make Norfolk and Suffolk the UK's clean growth region.
Support delivery of decentralised, renewable and low-carbon energy generation and grid infrastructure.	Policies 2 and 4 promote improvements to the energy grid, the development of local, renewable and low carbon energy networks to serve major new developments and an increase in free standing renewable energy generation, such as solar farms. As required by the NPPF, wind farm development needs to have clear local support so is encouraged through the Neighbourhood Plan process.
Shape places and secure new development to minimise vulnerability and provide resilience to impacts from climate change.	Policies 1, 2, 3, 4 and 7 support further development of the green infrastructure network which will provide for mitigation of and adaptation to climate change, including promoting biodiversity net gain and improved and linked habitats. In addition, the GNLP minimises flood risk through the location of development. Most of the development is located away from areas at risk of flooding from rivers. The exception is a small number of brownfield sites by the Rivers Wensum and Yare in the city centre and East Norwich where new development can create new quarters for the city and flood mitigation measures are required. Development in the small number of allocated sites which have some areas of surface water flood risk should be located away from the parts of the site at risk of flooding and all suitable developments are required to use sustainable drainage.
Encourage community-led initiatives such as the promotion of decentralised, renewable and low carbon energy use or securing land for local food sourcing.	Policy 2 encourages communities to promote sustainable energy locally through neighbourhood plans, including wind energy development where there is local support. The requirement for significant amounts of green infrastructure in new development promotes local food sourcing by providing allotments.
Increase sustainable transport use and local transport solutions.	Policies 2 and 4 support the further development of low carbon transport networks. This includes improved walking and cycling facilities, the promotion of bus travel, Park and Ride and rail use, increased use of electric vehicles and demand management measures.
Have an effective monitoring regime to ensure evidence on reducing carbon dioxide emissions, recorded against the	Carbon emissions in Greater Norwich will continue to be monitored using district wide figures produced by Government on transport, domestic and industrial emissions. Our ambition is to reduce per capita emissions and thereby contribute to

[48] Draft Autumn 2019 available here

Climate Change Act and other key national statutory and policy frameworks.[49]	**meeting the national target to bring all greenhouse gas emissions to net zero by 2050[50], as well as helping to meet local targets, statements and plans[51]. Measures contained within the GNLP will enable further emissions reductions, continuing recent year-on-year trends.**	

[49] Local planning authorities should have regard to the following In relation to climate change policy:

1. S. 19(1A) of the Planning and Compulsory Purchase Act 2004
2. National Planning Policy Framework, including Chapter 14 on climate change
3. Climate Change Act 2008 and footnote 48 of NPPF
4. Environmental Assessment of Plans and Programmes Regulations 2004
5. Planning Practice Guidance
6. Duty to Co-operate section 33A of the Planning and Compulsory Purchase Act 2004 (link above)
7. The monitoring obligations under s. 35 of the 2004 Planning and Compulsory Purchase Act (link above) and Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

[50] 2019 UK Government greenhouse gas emissions target

[51] Norfolk County Council has adopted a target of achieving net zero carbon emissions by 2030 for council owned land and buildings and for travel. In addition, they will work towards carbon neutrality for the county, also by 2030.
Broadland District Council and South Norfolk Council are working on a joint Environmental Policy Statement and Action Plan. Norwich City Council are working on a new Carbon Management Plan and have adopted a vision document which commits to carbon neutrality by 2050. The GNLP will support achievement of any objectives or targets identified in adopted local strategies.

Consultation Questions for Section 4 – The Delivery of Growth and Addressing Climate Change

9. Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?
10. Do you support, object, or have any comments relating to the approach to Economic Development set out in the Delivery Statement?
11. Do you support, object, or have any comments relating to the approach to Infrastructure set out in the Delivery Statement?
12. Do you support, object, or have any comments relating to the Climate Change Statement?

SECTION 5 – THE STRATEGY

POLICY 1 THE SUSTAINABLE GROWTH STRATEGY

Introduction

141. This document meets the National Planning Policy Framework's (NPPF) primary purpose for a local plan by providing the planning strategy for the pattern and scale of development to meet growth needs in Greater Norwich from 2018 to 2038. It also provides some indication of a "direction of travel" for future beyond 2038 by suggesting potential opportunities for longer term locations for growth.

142. The policy sets out the broad strategic approach, which is illustrated on the draft key diagram on page 47. It also provides the context for subsequent more detailed strategic locational, thematic and sites policies in the plan.

143. Achieving sustainable development is at the heart of the planning system. This means striving to meet social, economic and environmental needs to provide a good quality of life for existing and future generations. The aim is to retain and enhance the distinctive qualities of Greater Norwich and create environmentally sustainable, resilient and socially inclusive communities. As required by the NPPF, policy 1 promotes sustainable development.

144. The strategy takes a flexible approach in what will be a time of rapid change in how we work, travel and live owing to expected technological, economic and environmental changes. It aims to make the most of Greater Norwich's substantial economic growth potential to develop its leading role in the national economy and to meet housing need, whilst also protecting and enhancing the special environment of our area and promoting low carbon development.

145. The strategy meets national planning policy requirements, is informed by consultation feedback and is based on an extensive evidence base covering a wide variety of issues including infrastructure needs, Habitats Regulations Assessment (HRA) considerations and Sustainability Appraisal (SA).

146. The policy establishes that five-year housing land supply will be calculated across the whole of the three districts and commits the councils to reviewing the plan five years after adoption.

Employment Growth Needs

147. The NPPF requires local plans to set out an economic strategy.

148. Building on recent success in terms of the delivery of new jobs, the overall target for jobs growth is for an increase of 33,000 jobs from 2018 to 2038. This figure has been established through local trend-based evidence[52].

[52] The East of England Forecast Model

149. Providing the right sites in the right places for sectors with the greatest economic potential will support continued growth and a vibrant economy. Evidence[53] shows that:

a. a range of sectors will drive economic and employment growth, many of which are within high value knowledge-intensive sectors that are increasingly important to the wider UK economy. Greater Norwich is home to several internationally recognised businesses and boasts a diverse property portfolio. Its increasingly entrepreneurial economy is underpinned by a strong foundation of academic and commercial research, making it well positioned nationally and internationally to compete for future business investment as part of the Cambridge Norwich Tech Corridor as well as continuing to grow its own business base;
b. growth potential is greatest in five high impact sectors identified in the Norfolk and Suffolk Economic Strategy[54]: advanced manufacturing and engineering; agri-tech; energy; ICT/digital culture; and life sciences;
c. the total amount of allocated and permitted employment land in 2018 is broadly enough to provide for expected and promoted growth, so the policy does not make significant additional allocations of employment land beyond those already identified in existing local plan documents.

150. This plan therefore allocates employment sites totalling around 360 hectares including strategic employment land in Norwich City Centre, the Norwich Airport area, Rackheath, Broadland Business Park, Broadland Gate, Norwich Research Park (NRP), Wymondham/Hethel, Longwater and the Food Enterprise Park. These are set out in the Key Diagram and in policy 1. The strategic employment locations provide for growth of all the key sectors and are supported by good quality infrastructure and nearby housing, either existing or planned.

151. Parts of the NRP have Enterprise Zone status with simplified planning rules, business rate discounts and superfast broadband designed to promote research-based business growth. The Food Enterprise Park has Food Enterprise Zone status and a Local Development Order on parts of the site to encourage and support food production, processing and agriculture through the co-location of commercial enterprises.

152. The strategic sites contribute to the Cambridge Norwich Tech Corridor, supporting a globally significant axis between the Cambridge University and UEA/NRP. The Tech Corridor links to other significant growth corridors: London-Stansted-Cambridge and the Cambridge - Milton Keynes-Oxford Arc (CaMkOx).

153. Supporting and demonstrating a link to nationally significant growth corridors will assist in attracting inward investment and accessing funding opportunities as Government funding will be linked to the delivery of the Norfolk and Suffolk Economic Strategy and the emerging Local Industrial Strategy for Norfolk and Suffolk[55].

154. The Greater Norwich Local Plan also allocates land and allows for additional windfall delivery of smaller scale sites to provide for jobs growth elsewhere in the urban area, towns and

[53] The 2017 Greater Norwich Employment, Retail and Town Centres Study (the GVA study)
[54] Available here
[55] Draft Autumn 2019 available here

villages, providing local job opportunities and supporting small-scale businesses and a vibrant rural economy.

155. Evidence shows that there is an underlying demand for good quality office growth and employment space in Norwich city centre. The policies for the economy (policy 6) and for Norwich urban area (policy 7.1) address the need to ensure that high density employment uses are concentrated in highly accessible locations, particularly in the city centre.

Housing Growth Needs

156. The existing commitment[56] of housing land at April 2019 is large and shapes the GNLP strategy. The existing allocations, including Site Allocation plans, Area Action Plans and Neighbourhood Plans, derive from the Joint Core Strategy (JCS). These allocations have been demonstrated to be sustainable and, except for later phases of some larger sites where delivery is unlikely before 2038, they are included in this strategy. This deliverable commitment, along with the homes delivered since the start of the plan period in April 2018, provides 82% of the total housing growth identified in this plan to 2038.

157. The Government produced a revised standard methodology for identifying local housing need in 2019. Table 6 below sets out how the resulting total housing figure from 2018 to 2038 for the GNLP has been established using the standard methodology and including a buffer to ensure delivery:

Table 6 Establishing the Plan's total housing figure

	Number of Homes		**Explanation**
A	**Local housing need (2018 to 2038)**	**40,541**	The minimum local housing need figure has been identified using the Government's standard methodology.
B	**Delivery 2018/2019**	**2,938**	The number of homes built 2018/2019 (including student accommodation and housing for the elderly)
C	**Existing commitment** (at April 2019) **to be delivered to 2038**	**33,565**	The existing commitment is the undelivered sites which are already allocated and/or permitted, with parts of or whole sites unlikely to be delivered by 2038 excluded.
D	**New allocations**	**7,840**	These are the homes to be provided on new sites currently proposed to be allocated through the GNLP (6,640) and the South Norfolk Village Clusters Housing Sites Allocation Plan (1,200).
B + C + D	**Total housing figure**	**44,343**	Delivery (B), commitments (C) and new allocations (D). This currently provides a **9% buffer** to cater for any non-delivery of sites **to**

[56] Housing Commitment is sites which are allocated or have permission for housing development

			ensure delivery of local housing need. The publication version of the plan will aim to provide a minimum 10% buffer (a minimum of a further 250 homes) which is likely to be provided through a combination of additional sites proposed through this consultation and contingency sites identified in this draft plan.

158. In line with the above figures, policy 1 provides for around 44,500 new homes, with a 9% buffer to ensure delivery. In addition to the existing commitment of 1,349 homes, a minimum of 1,200 of these homes will be provided in village clusters in South Norfolk. Sites to provide these homes will be allocated in the South Norfolk Village Clusters Housing Site Allocations document.

Windfall developments

159. Windfall developments provide additional potential for housing delivery not counted in the above table. The policy supports appropriate windfall development, including sites in and adjacent to villages and small brownfield sites. Based on previous local trends, the likely scale of windfall development is in the region of 3,870 dwellings between 2018 and 2038. Demand will determine whether windfall development is instead of, or in addition to, allocated growth.

160. Policy 7.5 allows for limited further windfall development on very small sites of up to 3 dwellings in each parish during the plan period.

161. A contingency site at Costessey for around 1,000 homes is included in this plan should this prove to be required due to low delivery of allocated housing sites. The settlement of Wymondham may also be considered for contingency sites to provide an additional 1,000 homes if required, though no specific sites have been identified at this time.

162. The Government encourages authorities to consider higher levels of growth than that required to meet local housing need, particularly where there is the potential for significant economic growth. Our overall approach, including to windfalls and contingency, builds in flexibility to support higher than trend economic growth incorporating the Greater Norwich City Deal.

The Growth Strategy

163. To ensure sustainable development, minimise carbon emissions, promote strong, resilient, inclusive and vibrant communities and meet other Government requirements set out in the NPPF, the strategy for the location of growth:

a. Maximises brownfield development and regeneration opportunities, which are mainly in Norwich. The brownfield/greenfield split for new homes in the plan is 27%/73%;

Note: At this stage uncertainty remains about a potentially key site at Carrow Works. The figure for additional homes in Norwich in policy 1 includes an allowance for 1,200 new homes at the site. This figure could be amended depending on circumstances, which may an impact on the Publication (Regulation 19) version of the plan.

b. Broadly follows the settlement hierarchy set out in policy 1 (the Norwich urban area; main towns; key service centres and village clusters) in terms of scales of growth as this reflects access to services and jobs;

c. Focusses most of the growth in locations with the best access to jobs, services and existing and planned infrastructure in and around the Norwich urban area and the Cambridge Norwich Tech corridor;

d. Focusses reasonable levels of growth in the main towns, key service centres and village clusters to support a vibrant rural economy. The approach to village clusters is innovative. It reflects the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages.

e. Allocates strategic scale housing sites (1,000 dwellings +) in accessible locations;

f. Allocates a significant number of medium scale and smaller scale sites in the urban area, towns and villages, providing a balanced range of site types to allow for choice, assist delivery and allow smaller scale developers and builders into the market. Overall, 12% of the homes allocated through the plan are on sites of no larger than 1 hectare, meeting national requirements[57];

g. Sets a minimum allocation size of 12-15 dwellings to ensure that a readily deliverable amount of affordable housing is provided on all allocated sites.

164. The strategy for the distribution of growth set in policy 1 takes account of the above principles, the scale of existing and deliverability of commitment and assessments of sites submitted to the GNLP.

The Settlement Hierarchy

165. Housing growth is distributed in line with the following settlement hierarchy:

I. The **Norwich urban area** which consists of **Norwich** and the built-up parts of the **fringe parishes** of Colney, Costessey, Cringleford, Drayton, Easton, Hellesdon, Old Catton, Sprowston, Taverham, Thorpe St. Andrew, Trowse and the remainder of the Growth Triangle.

[57] Paragraph 68 a) of the NPPF requires plans to identify land to accommodate at least 10% of the housing requirement on sites of no larger than one hectare.

II. The **main towns** which are Aylsham, Diss (including part of Roydon), Long Stratton, Harleston and Wymondham.

III. The **key service centres** which are Acle, Blofield, Brundall, Hethersett, Hingham, Loddon/Chedgrave, Poringland/Framingham Earl, Reepham and Wroxham.

IV. **Village clusters** which cover the remainder of the Greater Norwich Local Plan area.

166. Table 7 below sets out the amount and proportion of growth in the different settlement hierarchy areas established by the strategy and provides estimates for homes there will be in each area in 2038.

Table 7 Housing growth 2018 to 2038 (figures rounded)

Area	Homes 2018	Homes 2038 (and increase)	Increase %	% of total housing growth
Norwich urban area	**106,100**	**136,660 (+30,560)**	**29**	**69**
The Main Towns	**19,400**	**25,742 (+ 6,342)**	**33**	**14**
The Key Service Centres	**15,900**	**19,317 (+ 3,417)**	**21**	**8**
Village clusters	**46,100**	**50,124 (+ 4,024)**	**9**	**9**
Total	**187,500**	**231,843 (+ 44,343)**	**24**	

167. No new settlement is proposed at this time as a significant proportion of the allocated sites are strategic scale commitments of 1,000 homes plus and the establishment of any new settlement is likely to take a long time. However, three new settlement sites have been proposed (at Honingham Thorpe, Hethel and Silfield). The longer-term development of a new settlement could be a suitable option in the future. This should be considered in the next review of this plan.

The strategic growth area

168. The strategy distributes around 78% of the growth in the "Strategic Growth Area". This area is broadly defined on the Key Diagram and shown in map 7 to include:

- The main Cambridge Norwich Tech Corridor area, including Norwich, the North East Growth Triangle, the remainder of the Norwich Fringe, Hethersett and Wymondham;
- All the strategic employment areas in the plan;
- All but one of the strategic scale housing growth locations (the exception is Long Stratton);

- High quality public transport, road and cycling infrastructure (both existing and planned) and
- The great majority of brownfield sites in the area.

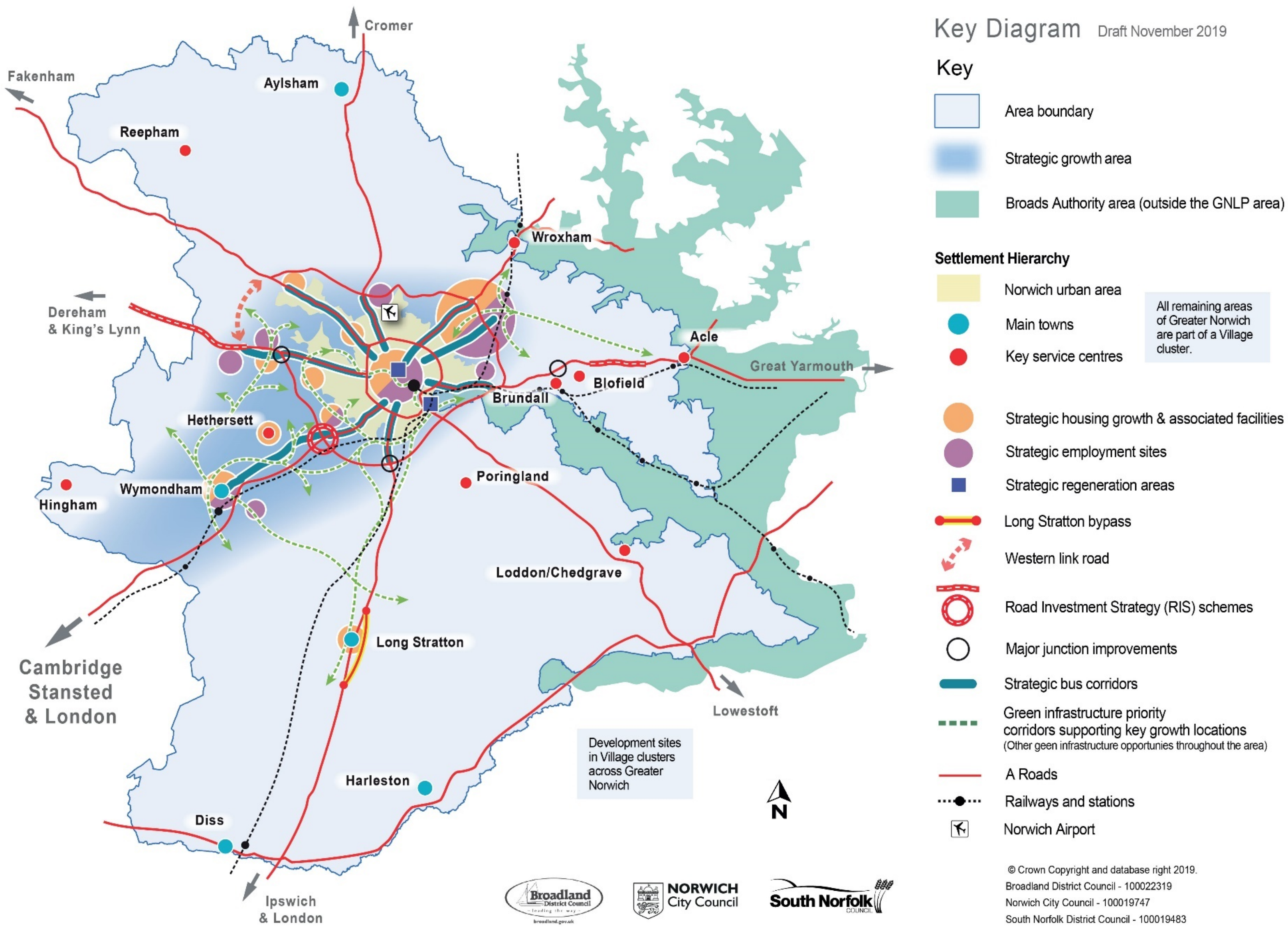
169. Identifying this area promotes the strategic economic strengths and sectors of Greater Norwich. By linking to other regional growth corridors, it places Greater Norwich firmly on the national stage for growth and accessing external funding.

170. With Norwich playing an anchoring role in the strategic growth area, it also recognises the role the city plays as a driver of the regional economy, supporting the vitality and regeneration of the city centre, including maximising the potential of brownfield sites.

The Key Diagram

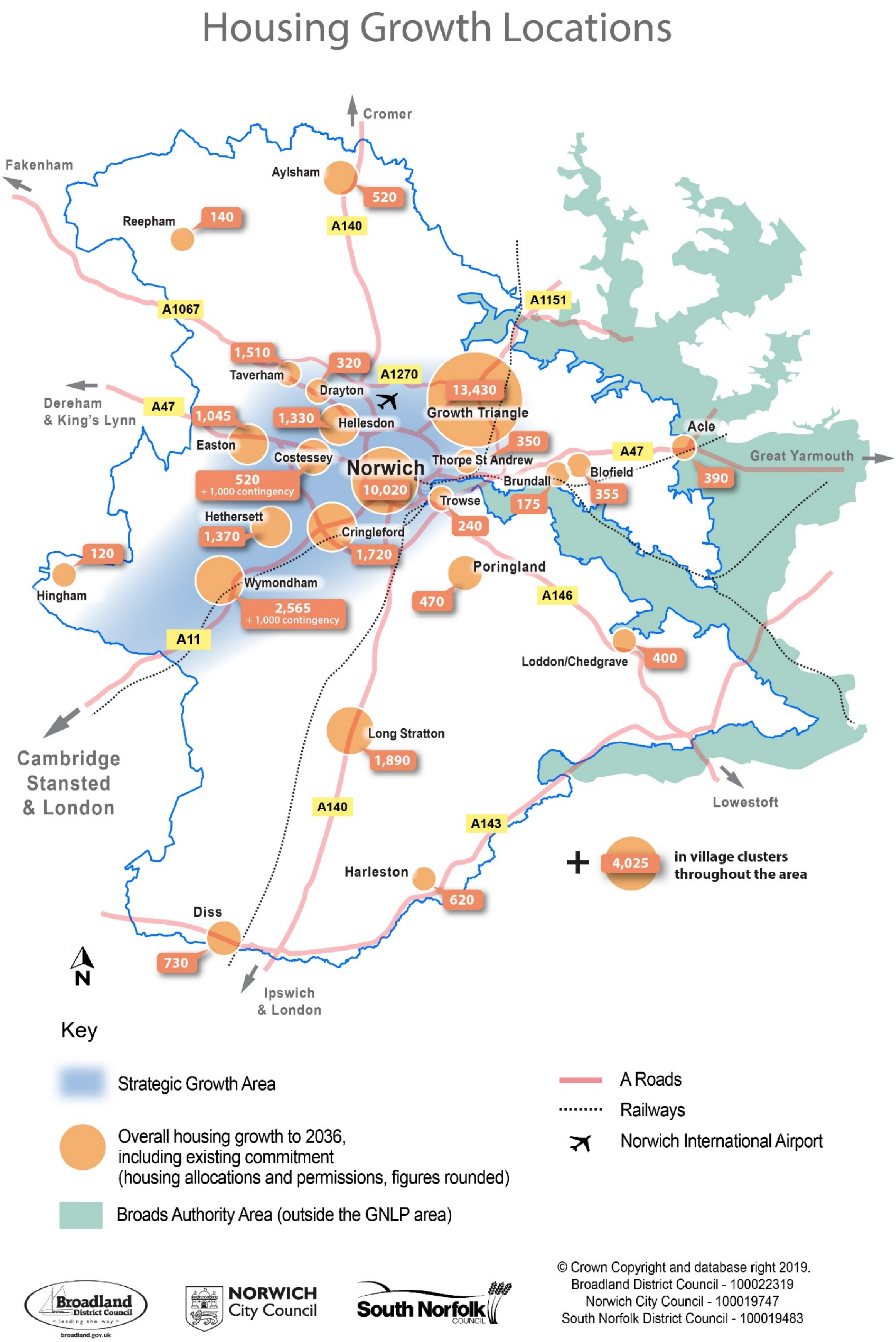
171. Strategic local plans are required to include a Key Diagram which illustrates key elements of the strategy in the plan on an indicative map.

KEY DIAGRAM


Key Diagram Draft November 2019
Key
Area boundary
Strategic growth area
Broads Authority area (outside the GNLP area)
Settlement Hierarchy
Norwich urban area
Main towns
Key service centres
All remaining areas of Greater Norwich are part of a Village cluster.
Strategic housing growth & associated facilities
Strategic employment sites
Strategic regeneration areas
Long Stratton bypass
Western link road
Road Investment Strategy (RIS) schemes
Major junction improvements
Strategic bus corridors
Green infrastructure priority corridors supporting key growth locations
(Other geen infrastructure opportunies throughout the area)
A Roads
Railways and stations
Norwich Airport
© Crown Copyright and database right 2019.
Broadland District Council - 100022319
Norwich City Council - 100019747
South Norfolk District Council - 100019483
Cromer
Fakenham
Aylsham
Reepham
Wroxham
Dereham & King's Lynn
Acle
Great Yarmouth
Blofield
Brundall
Hethersett
Poringland
Wymondham
Hingham
Loddon/Chedgrave
Long Stratton
Cambridge Stansted & London
Lowestoft
Development sites in Village clusters across Greater Norwich
Harleston
Diss
Ipswich & London
N
Broadland District Council
NORWICH City Council
South Norfolk Council

117. Map 7 below provides further detail for housing by illustrating the location and scale of housing growth allocated through the plan across Greater Norwich.

Map 7 Housing Growth Locations



<u>POLICY 1 – THE SUSTAINABLE GROWTH STRATEGY</u>

Sustainable development and inclusive growth are supported by delivery of the following between 2018 and 2038:

- **to meet the need for around 40,550 new homes, sites are committed[58] for a minimum of 44,340 new homes;**
- **to aid delivery of 33,000 additional jobs and support key economic sectors, around 360 hectares of employment land is allocated, and employment opportunities are promoted at the local level;**
- **supporting infrastructure will be provided in line with policies 2 and 4;**
- **environmental protection and enhancement measures including further improvements to the green infrastructure network will be delivered.**

The sustainable growth strategy is illustrated in the Key Diagram on page 48.

<u>SETTLEMENT HIERARCHY</u>

The settlement hierarchy is:

1. **Norwich urban area (Norwich and Norwich Fringe[59])**
2. **Main towns**
3. **Key service centres**
4. **Village clusters.**

Growth is distributed in line with the settlement hierarchy to provide good access to services, employment and infrastructure. It is provided through urban and rural regeneration, along with sustainable urban and village extensions.

Most of the housing, employment and infrastructure growth is focussed in the Strategic Growth Area illustrated on the Key Diagram. This includes Greater Norwich's part of the Cambridge Norwich Tech Corridor, including the Norwich urban area, Hethersett and Wymondham and key strategic jobs sites at Hethel and the Norwich Research Park. Growth is also focussed in towns and villages to support vibrant rural communities.

<u>HOUSING</u>

Housing commitments are located to meet the need for homes across the area, providing good access to services, facilities and jobs, supporting sustainable urban and rural living. Accordingly, housing commitments are distributed as follows:

[58] This includes existing allocated sites carried forward, new allocations made through the GNLP and sites with planning consent.

[59] The Norwich fringe is the built up parts of the fringe parishes of Colney, Costessey, Cringleford, Drayton, Easton, Hellesdon, Old Catton, Sprowston, Taverham, Thorpe St. Andrew, Trowse and the remainder of the Growth Triangle.

Area		Existing deliverable commitment (including uplift and delivery 2018/19)	New allocations	Total minimum deliverable housing commitment 2018 - 2038
Norwich urban area		26,165	4,395	30,560
The main towns of Wymondham, Aylsham, Diss (with part of Roydon), Harleston and Long Stratton		5,092	1,250	6,342
The key service centres of Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framingham Earl, Reepham and Wroxham		2,902	515	3,417
Village clusters (see appendix 5 details of the clusters)	In the remaining parts of Broadland (see policy 7.4 and the GNLP Sites Plan for specific sites)	995	Up to 480[60]	4,024
	In South Norfolk (see policy 7.4 and the South Norfolk Village Clusters Housing Site Allocations document for specific allocations)	1,349	A minimum of 1,200	
Total		36,503	7,840	44,343

Policies 7.1 to 7.5 provide details on distribution and the Sites document provides individual site policies. Individual site policies for villages in South Norfolk will be in the South Norfolk South Norfolk Village Clusters Housing Site Allocations document.

To provide choice and aid delivery of housing, proposals for additional "windfall" housing growth will be considered acceptable in principle at appropriate scales and locations where they would not have a negative impact on the character and scale of the settlement, and subject to other local plan policies:

1. **Within settlement boundaries in accordance with the above settlement hierarchy;**
2. **Elsewhere in village clusters, subject to the requirements of policy 7.4.**
3. **On sites of up to 3 dwellings in all parishes, subject to the requirements of policy 7.5.**

[60] This figure is based on the higher potential Broadland village cluster site capacities set out in appendix 5 and the GNLP Sites Plan

Plan review and five-year housing land supply

This plan will be reviewed 5 years after adoption. Five-year housing land supply will be calculated across the whole of the three districts. The plan provides enough allocations to provide a five-year housing land supply on adoption[61].

ECONOMY

Strategic employment locations in the Key Diagram are protected from other forms of development and will support both a broad range of employment and key economic sectors as set out in policy 6. The strategic locations are:

- **Norwich city centre;**
- **the Norwich Airport area;**
- **Browick Interchange, Wymondham;**
- **Longwater;**
- **Rackheath;**
- **Broadland Business Park;**
- **Broadland Gate;**
- **Norwich Research Park;**
- **Hethel and**
- **The Food Enterprise Park at Easton/Honingham.**

In addition, smaller scale employment sites are allocated in urban areas, towns and large villages to provide local job opportunities, supporting small businesses and vibrant urban and rural economies.

INFRASTRUCTURE

The sustainable growth strategy will be supported by improvements to the transport system, green infrastructure and services.

Alternative approaches

Housing and job numbers

The local plan's **preferred option** is to support growth of around 33,000 new jobs and a minimum of around 40,540 new homes between 2018 and 2038. These figures are based on our evidence of employment growth needs and the use of the Government's standard methodology for assessing housing need. To ensure delivery, identified sites provide for a significant excess of land for employment and around 9% additional dwellings. Providing additional land as a buffer is a standard approach to ensure delivery. In addition, the plan provides significant flexibility with no phasing restriction on sites, the identification of contingency sites and the approach to future windfall development.

[61] This will be confirmed through the housing delivery trajectories in the publication (Regulation 19) version of the plan. As part of this draft plan (Regulation 18) consultation, we have written to all of the site owners/agents for the preferred options and reasonable alternative housing sites. This is to require the site owners/agents to evidence that their sites will deliver in either the 0-5, 6-10 or final period of the plan to enable sites to be included in the publication version of the plan. Trajectories will be included in the publication version based on the feedback and for each site.

The **jobs targets** are derived from an analysis of "enhanced growth". An alternative would be to plan for lower levels of economic growth, but this is not consistent with local objectives and is not considered to be reasonable. Alternatively, the plan could adopt higher jobs targets but, as it already provides for enhanced growth and with current economic uncertainties, significantly higher targets are unlikely to be achievable. The over allocation of land provides the flexibility to facilitate higher growth should it occur.

In the absence of any exceptional circumstances setting a lower **housing target** than derived from the Government's standard methodology would be inconsistent with the NPPF and is not considered to be a justifiable alternative. The NPPF does encourage a higher housing requirement to be considered. This is not the preferred alternative as evidence of delivery over the medium and longer term suggests that higher targets are unlikely to be achievable or deliverable. Setting a higher target than can be achieved undermines the plan-led system. However, if additional need and demand for housing materialises, it can be facilitated through the flexibility built into the local plan.

The plan could identify a smaller **delivery buffer** and/or include **windfall** development as part of the housing provision total. This is not the preferred alternative as it would reduce the chances of meeting housing need and would take away the flexibility that allows the plan to respond to changing circumstances. A larger delivery buffer might be considered. However, the preferred approach is considered to provide enough flexibility.

The Settlement Hierarchy and the distribution of housing

The preferred **settlement hierarchy** follows a typical approach reflecting materially different levels of service between different types of places. It is innovative in grouping all smaller villages and the countryside into village clusters. An alternative would be to revert to a similar approach to the existing local plans for the area with the separate identification of service villages, other villages and countryside.

This is not preferred as the Councils consider that a cluster approach better reflects the way people access services in rural areas and enhances social sustainability by facilitating higher levels of growth in small villages. Where individual settlements fit within the hierarchy could be reconsidered but the preferred categorisation best fits the evidence of service provision. The allocation of sites in the clusters in South Norfolk will be made through a separate plan.

The **distribution of development** in the plan tends to focus more growth higher up the hierarchy maximising the use of brownfield land and providing for urban extensions close to existing jobs, services and infrastructure. Within that general approach several alternative approaches can be identified for the distribution of development. The consultation in early 2018 on Growth Options (see pages 31 to 35) identified six reasonable alternatives:

Option 1 - Concentration close to Norwich
Option 2 – Transport corridors
Option 3 – Supporting the Cambridge to Norwich Tech Corridor
Option 4 - Dispersal
Option 5 – Dispersal plus New Settlement
Option 6 – Dispersal plus Urban Growth

The preferred option in this plan combines concentration of most of the development in and around Norwich and on the Cambridge Norwich Tech Corridor, with an element of dispersal to villages to support thriving rural communities. Whilst detailed variations on this option may be reasonable, it is considered that the preferred approach provides the best balance across the range of objectives of the plan.

<u>Review and Five-Year Land Supply</u>

The preferred option commits to **a review of the plan after 5 years**. As this is good planning practice to ensure that growth needs are met and is required by Government, a longer period is not considered to be a justifiable alternative. While a shorter review period could be reasonable**,** experience suggests it is unlikely to be achievable.

Government policy allows **5-year land supply to be calculated on a district wide basis**, **or across boundaries where local authorities work together**. While either could be considered, the preferred approach is to calculate the 5-year land supply across the whole of the three districts. This better reflects the single local plan and ongoing cooperation on delivery; the inter-relationship of social and economic needs throughout the area; and the recognition that much of the area falls within a single core housing market area.

Economy

The identification of strategic **employment locations** highlights opportunities for large scale growth, helps prioritise infrastructure investment and maximises the existing strengths of the local economy. This is coupled with the promotion of local employment opportunities. No alternative approach is identified.

Infrastructure

New development must be supported by **additional infrastructure** of all kinds. Policies 1 and 4, along with appendix 1, set out the infrastructure requirements to serve the growth in Greater Norwich based on evidence in the Greater Norwich Local Plan Infrastructure Needs Report. This provides flexibility to allow for any changing needs over time, and no alternative approach is identified.

Consultation Questions for Policy 1 – The Sustainable Growth Strategy

13. Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?
14. Do you support, object or wish to comment on the approach for housing numbers and delivery?
15. Do you support, object or wish to comment on the approach for the Economy?
16. Do you support, object or wish to comment on the approach to Review and Five-Year Land Supply?
17. Do you support, object or wish to comment on the approach to Infrastructure?

POLICY 2 - SUSTAINABLE COMMUNITIES

Introduction

172. The Sustainable Communities policy are wide ranging. It aims to ensure that the design of development is high quality, contributes to the establishment and maintenance of resilient and inclusive communities, promotes low carbon development and helps to address climate change. It is a key strategic policy, covering many aspects of the vision and objectives of the plan. Together with policy 3, which focuses on the design of development reflecting local character and sense of place using local design guidance, the policy promotes well-designed places as required by section 12 of the NPPF.

173. The policy covers ten key social, economic and environmental issues which all developments must address through their design. These are set out in table 8 below. The table also references other relevant plan policies and supporting supplementary planning documents.

Table 8 - Key issues addressed by policy 2

Issue number in policy 2	Requirement and justification
1. Access to services and facilities	Developments are required to provide convenient, safe and sustainable access to new on-site services and facilities or to existing facilities as appropriate. This reduces the need to travel and provides local access to services and facilities, supporting their viability. Strategic infrastructure is provided for through policy 4.
2. New technologies	The policy requires development to allow for the delivery of new technologies. Such a strategic approach is important for economic growth and will have environmental and social benefits. The policy encourages developers to work with service providers on the delivery of a broad range of existing, developing and future technologies, with broadband and mobile phone networks a current focus. Developers must therefore ensure broadband infrastructure is provided for new developments. To do this, they should register new sites with broadband infrastructure providers. The preference is that all residential developments over 10 dwellings and all employment developments will provide Fibre to the Premises (FTTP) for high connection speeds. For smaller schemes, the expectation is that FTTP will be provided where practical. Where this is not possible, then non-Next Generation Access (NGA) technologies that can provide speeds more than 24Mbps should be delivered. The policy also provides the basis for more detailed development management policies or supplementary planning documents for measures to support new technologies in times of rapid change, including the use of electric vehicles.
3. Green infrastructure	Developments are required to provide on-site green infrastructure appropriate to their scale and location. The three main benefits of green infrastructure: biodiversity gain; the promotion of active travel and the reduction of flood risk, are key NPPF priorities. On-site provision will link and contribute to the further development of an area-wide green infrastructure network, promoted through policies 3 and 4, which has now been in development in Greater Norwich for over a decade.

4. Densities	In line with the NPPF, developments are required through this policy to make effective use of land. To do this, the policy establishes minimum densities for different part of the area. It requires higher densities in the most sustainable locations. These are mainly in Norwich and in the city centre where, dependent on design issues, high densities have and can be delivered. It also establishes a minimum density elsewhere to ensure the effective use of land. The policy will be used with policy 3 which focuses on design creating a distinct sense of place and reflecting local character.
5. Landscape	The NPPF requires local plans to recognise the intrinsic character and beauty of the countryside. Accordingly, the policy requires development to respect landscape character, based on existing and any future landscape character assessments, and protects locally valued landscapes from inappropriate development. It continues the well-established approach in Greater Norwich of having strong landscape protection policies. To do this, it provides the strategic policy basis for more detailed, location specific development management policies covering the strategic gaps and landscape settings including river valleys, undeveloped approaches to Norwich and the setting of the Broads. This is the most suitable approach to landscape protection locally given that Greater Norwich does not have the exceptional circumstances required by Government to establish a Green Belt.
6. Travel	The policy requires appropriate development to be designed to manage travel demand, promote active and sustainable travel and to ensure parking is addressed effectively. The design of development, as well as its location[62] and the local availability of services addressed in point 1 of this policy, play an important role in determining how much and how people travel. This is particularly the case on larger sites where good design can significantly influence travel habits. In addition, the policy requires sites to be designed to accommodate parking without impacting on the amenity of residents.
7. Inclusive and safe communities	In line with the NPPF, this element of the policy covers social aspects of the design of development. The requirement focuses firstly on ensuring services are accessible either within or from new developments. Secondly, the policy covers the creation and maintenance of resilient, safe and inclusive communities in which all members of society can interact. Thirdly, the design of development is required to promote healthy and active lifestyles.
8. Resource efficiency and pollution	This part of the policy covers a range of the environmental issues that new development must focus on, most of which have an impact on addressing climate change. Point 9 provides the strategic basis for more detailed development management policies or detailed guidance on resource efficiency, pollution, overheating and ground conditions.
9. Water	Point 9 of the policy covers the range of issues related to water affecting new development, including flood risk, water quality, sustainable drainage (SUDS) and water efficiency. As evidenced by the Strategic Flood Risk Assessment, the great majority of development promoted through this plan avoids areas at risk of flood. Any mitigation required, mainly in parts of Norwich city centre and East Norwich, will come forward as part of specific developments and will be guided by a level 2 Strategic Flood Risk Assessment.

[62] Addressed through policy 1 of this plan.

	Government policy expects local planning authorities to adopt proactive strategies to adapt to climate change, taking into account water supply and demand considerations. It allows local plans to set a higher standard of water efficiency than the Building Regulations where evidence justifies it. For housing development, only the higher Building Regulations standard for water prescribed by Government (110 litres per person per day) can applied through local plans and more demanding standards cannot be set. If the potential to set more demanding standards locally is established by the Government in the future, these will be applied in Greater Norwich. For non-housing development, broadly equivalent standards can be required using BREEAM assessments. In Greater Norwich, evidence and justification on the need for water efficiency measures includes: • The Environment Agency (EA) has identified Greater Norwich as water stressed in its 'Water Stress Area Final Classification (2013), the primary source of evidence which supports a tighter water efficiency standard; • The need for water efficiency is particularly significant in Greater Norwich given its proximity to internationally protected water environments, including the River Wensum and the Broads; • Anglian Water's strategic approach[63] to providing water supplies to meet growth needs includes a major focus on water efficiency measures; • The Norfolk Strategic Planning Framework and the key relevant organisations, the Environment Agency and Natural England, all support retaining this approach which has been in place in Greater Norwich since 2011; • The cost of such a policy, implemented using water efficient fixtures and fittings, is negligible[64]. It can be easily achieved through a flexible variety of measures to suit different types of homes and buildings. The cheapest approach is the use of water efficient fixtures and fittings. Solutions can also include the use of greywater recycling and rainwater capture. It will have no effect on development viability and will lead to financial savings for householders and users of other developments, along with carbon emissions reductions. Implementation of the standards for water efficiency will be supported by an updated advice note.
10. Energy	Point 11 of the policy requires development to be designed and orientated to minimise energy use, an easily achievable and cost-effective means of promoting low carbon development. It also supports decarbonised energy supplies locally by promoting decentralised, renewable and low carbon energy generation and battery storage, as well as energy efficiency in new developments. This approach to energy in new developments is required as: • Evidence[65] shows that a positive approach to promoting energy efficiency and locally generated sustainable sources of energy, as well as promotion

[63] Anglian Water Revised Draft Water Resources Management Plan 2019
[64] Estimated by the Government at £6-9 per dwelling (The Housing Standards Review, 2015)
[65] The Greater Norwich Energy Infrastructure Study (March 2019)

	of the use of battery storage, is required to address local energy network capacity constraints and to ensure the timely delivery of growth; • The NPPF requires a positive approach to be taken to promoting energy efficiency. In doing so, policy 2 anticipates the Government's "Future Homes Standard" currently scheduled to be introduced by 2025, which will require all new build homes to have low carbon heating and high levels of energy efficiency. When the Government implements the Future Homes Standard it will strengthen the GNLP policy approach by providing further measures. The NPPF also requires a positive approach to large scale renewable energy generation except for onshore wind energy development. No suitable sites for onshore wind energy development have been submitted to the GNLP. The best ways to display local support, as required by the NPPF, for onshore wind energy are through a neighbourhood plan which requires a local referendum or through any other future local plan documents which may consider suitable sites; • The LEP strategy [66] identifies energy as one of five high impact sectors with the potential for growth; • Policy 2 makes necessary updates to existing development management policies to address the above. Policy 2 therefore establishes standards for energy efficiency in new housing and non-housing development. Further detail on how this will be achieved will be set out in a future Energy Policy Implementation Note or SPD. This approach is deliberately flexible as: • The defined standards are not prescriptive. They allow for either a "fabric first" approach to reducing energy use, which on many types of site tends to be cheaper, or the use of on-site sustainable energy, or a mixture of both; • Implementation notes or SPDs can be amended to reflect rapid changes technologies and other changes of circumstance such as changes to national policy, such as Government's indication through a ministerial statement that national policy will change in 2025 to prevent the use of fossil fuels to heat new homes. Evidence shows the policy is viable[67]. Investment in energy efficiency in new development will have the significant additional benefits of reducing energy costs for the users of new development, as well as carbon savings. The policy also requires larger developments (100 dwellings plus or 10,000 square metres plus for non-residential development) to maximise opportunities for the use of sustainable local energy networks. This requirement is also set in line with the recommendations of the Greater Norwich Energy Infrastructure Study. The study sets out that there are likely to be constraints on the electricity grid and recommends ways to avoid or reduce the costs of improved network connection which

[66] New Anglia Local Enterprise Partnership's Norfolk and Suffolk Economic Strategy
[67] GNLP Viability Assessment (NPS, September 2019)

	are relevant to all larger sites, and to those sites affected by grid constraints named in appendix 1. Measures to implement point 6 of the policy, to be evidenced on a site by site basis through the Sustainability Statement, could include: • Semi-islanded approaches including high levels of on-site, renewable or low carbon generation and batteries; • Demand side responses, where on-site generation could be turned up or load reduced in response to network signals; • Investment in infrastructure delivered through an Energy Services Company, which can then provide a steady revenue stream for those involved.

Implementation

174. The policy will be implemented through:

- **Major developments[68] being required to submit a Sustainability Statement.** This will be supported by supplementary planning guidance. The purpose of the statement is to show, on a site by site basis, how the varied aspects of the policy are addressed. The policy encourages, but does not require, the use of Building for Life 12[69] design tool, or any equivalents or future successors. This provides flexibility in how applicants produce their sustainability statements for housing developments. The policy also encourages master planning using a community engagement process on larger sites (200 dwellings plus or 20,000 square metres for non-residential development) and requires it on sites of 500 dwellings plus or 50,000 square metres. The purpose of this is to promote effective community engagement in the design of larger schemes. It also includes a requirement for Health Impact Assessments for specific types of development to show how health care needs will be provided for.
- **Housing developments of 100 dwellings or more being required to submit a Delivery Statement.** This statement is aimed at supporting timely delivery of development, a priority for this plan. It requires developers to set out the timing of the delivery of developments in their statements accompanying planning applications. Where delivery does not happen, it enables the local authorities to consider the use of legal powers to promote delivery, including compulsory purchase.
- **All minor developments also being subject to the policy's requirements**. This will be assessed on a case by case basis, taking into account site characteristics and proposed uses. Minor developments are not required to submit a Sustainability Statement. This is in line with the threshold for national requirements for Design and Access statements for major developments only and ensures that planning application submission requirements are proportionate;
- **Existing development management policies**, which will be updated in due course, which detail some policy aspects such as the locations of areas protected from inappropriate development under landscape policies.
- **Supplementary Planning Documents and guidance** (see table above).

[68] Major developments are 10 dwellings or more, 1,000 square metres of floor space or 1 hectare or more of land.
[69] The government approved Building for Life 12 standard for well-designed homes is available here.

POLICY 2 – SUSTAINABLE COMMUNITIES

Development must be high quality, contributing to delivering inclusive growth in mixed, resilient and sustainable communities and to mitigating and adapting to climate change, assisting in meeting national greenhouse gas emissions targets[70]. To achieve this, development proposals are required as appropriate to:

1. **Ensure safe, convenient and sustainable access to on-site and local services and facilities including schools, health care, shops, leisure/community/faith facilities and libraries;**
2. **Allow for delivery of new and changing technologies (including broadband, fibre optic networks, telecommunications and electric vehicles);**
3. **Contribute to multi-functional green infrastructure links, including through landscaping, to make best use of site characteristics and integrate into the surroundings;**
4. **Make efficient use of land with densities dependent on-site characteristics, with higher densities and car free housing in the most sustainably accessible locations in Norwich. Indicative minimum densities are 25 dwellings per hectare across the plan area and 40 in Norwich[71].**
5. **Respect, protect and enhance landscape character, taking account of landscape character assessments or equivalent documents, and maintain strategic gaps and landscape settings, including river valleys, undeveloped approaches and the character and setting of the Broads;**
6. **Provide safe and suitable access for all users, manage travel demand and promote public transport and active travel within a clearly legible public realm, whilst also integrating parking and providing a high standard of amenity;**
7. **Create inclusive, resilient and safe communities in which people of all ages have good access to services and local job opportunities, can interact socially, be independent and have the opportunity for healthy and active lifestyles;**
8. **Be resource efficient, support sustainable waste management, reduce overheating, protect air quality, minimise pollution and take account of ground conditions;**
9. **Minimise flood risk, including reducing the causes and impacts of flooding, supporting a catchment approach to water management and using sustainable drainage. Development must also protect water quality and be water efficient. To achieve the latter:**
    - **Housing development will meet the Building Regulations part G (amended 2016) water efficiency higher optional standard;**
    - **Non-housing development will meet the BREEAM "Very Good" water efficiency standard, or any equivalent successor;**

   If the potential to set more demanding standards locally is established by the Government up to 2038, the highest potential standard will be applied in Greater Norwich.
10. **Minimise energy demand through the design and orientation of development and maximise the use of sustainable energy, local energy networks and battery storage to assist growth delivery. This will include:**
    - **All new development will provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016);**
    - **Appropriate non-housing development of 500 square metres or above will meet the BREEAM "Very Good" energy efficiency standard, or any equivalent successor.**

    Proposals for free standing decentralised, renewable and/or low carbon energy networks, except for wind energy schemes, will be supported subject the acceptability of wider impacts.

[70] The 2019 national target is to bring all greenhouse gas emissions to net zero by 2050

[71] The indicative densities are inter-related with local design issues (see policy 3). Higher densities are encouraged in and close to defined district and town centres, and in particular in the city centre.

Wind energy schemes will be supported where the proposal is in a suitable area as identified in a neighbourhood plan or other local plan documents.

To assist this broad-based approach:

i. **Planning applications for major developments will be required to be accompanied by a Sustainability Statement (including Health Impact Assessments as appropriate)[72] showing how development will support the above requirements, with housing development optionally making use of tools such as Building for Life 12 (or any successor). Other developments will meet the policy requirements as appropriate dependent on site characteristics and proposed uses. Flood risk assessments will be provided separately as required by Government guidance.**

ii. **Master planning using a recognised community engagement process will be encouraged on larger sites and required for proposed developments of 200 dwellings or 20,000 square metres plus.**

iii. **Delivery plans are required with planning applications for 100 dwellings plus to set out the timing of the delivery of developments. Where delivery cannot be demonstrated to be in accordance with agreed delivery plans for individual sites, the authorities may make use, where necessary, of their legal powers to bring about strategically significant development, including compulsory purchase.**

<u>Alternative approaches</u>

The draft policy contains criteria covering economic, environmental, and social imperatives for development that aid the creation of **sustainable communities**. The requirements are typical considerations for development proposals. While the policy sets out the preferred approach there may be other justifiable alternatives to the detail of the approach.

The preferred approach establishes the requirement for a **sustainability statement** to accompany planning applications for major developments and masterplans for large developments, to improve the quality of development and ensure that key NPPF priorities are implemented locally. Not requiring such a statement, or modifying its content, could be considered but would make the delivery of sustainable development more challenging.

The justification for the approach to **water i**s wholly compelling. Anglian Water recommends that new development should achieve water neutrality, so that the predicted increase in total water demand due to the development is offset by reducing the demand in the existing community. While water neutrality could be justified, at present, Government policy clearly states that it cannot be made a local plan requirement. Due to the significance of the issue locally, the policy establishes the intention to set more demanding standards if Government changes its policy approach.

The evidence and justification establish a clear need to set a **local energy efficiency policy** which goes beyond 2013 Building Regulations. The estimated cost of the preferred option for energy, at between £2,000 and £7,000 per dwelling depends on the approach taken to addressing the policy taken on a site by site basis, is viable. As such, it provides a challenging but achievable requirement.

[72] Health Impact Assessments are required for allocated sites of 500 dwellings plus, for non-allocated housing sites of 100 dwellings plus and for any housing proposal with a significant amount of housing for the elderly to show how the health care infrastructure needs of the new development are provided for.

It is not possible to set a greater percentage requirement for energy efficiency than 20%, or to a require a stepped approach to require all development to be carbon neutral by a specific date. Since the cost of this for housing development is likely to be at least £15,000 per dwelling, viability testing has concluded that such an approach could not be taken in Greater Norwich, so is not a justified alternative. If the Government enacts the planned changes to Building Regulations, or forms of policy to implement the Future Homes Standard, this policy approach will be strengthened.

Consultation Questions for Policy 2 –Sustainable communities

18. Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?
19. Do you support, object or have any comments relating to the specific requirements of the policy.

Consultation responses are welcomed on the likely cost of implementing the proposed energy policy approach locally.

POLICY 3 – ENVIRONMENTAL PROTECTION AND ENHANCEMENT

The Built and Historic Environment

175. The National Planning Policy Framework states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.

176. The Greater Norwich area has numerous heritage assets. Consequently, the historic environment is central to the character and quality of life of the Greater Norwich area and is a significant factor in its economic success through encouraging tourism and inward investment. Conserving and enhancing the historic environment will continue to reinforce what makes Greater Norwich an attractive place to live in, work and visit.

177. As a long settled and productive area, Greater Norwich also has a significant archaeological heritage which development can help to reveal.

178. As such, it is important to recognise that the historic character of the area is made up of a multitude of historic assets. Individually, some may be more important than others, but even the lesser ones are important in contributing to overall character and quality. All the different elements of the historic environment need to be taken into consideration and conserved and enhanced where possible as part of the development of the area.

179. The strategic approach to heritage is first to consider the potential location of development, for example does the location itself "fit" well in relation to adjoining settlements, and does it avoid intruding in important views of historic assets? This is addressed through the growth strategy set out in policy 1.

180. Following from this, the design of the development needs to respect the historic environment, be appropriate to its setting, seek to enhance the locality and provide measures to further the understanding of local heritage issues. Development should therefore draw upon existing historic character to lead to more positive change in the built and historic environment.

181. In certain cases, an element of harm to the historic environment resulting from development is unavoidable. The policy therefore requires such harm to be minimised. Where such harm is identified, its level should be weighed against public benefits in decision making.

182. The policy also includes a flexible approach to the use of historic assets to achieve their retention whilst retaining their historic significance. Historic significance potentially covers a broad range of issues such as artistic, aesthetic, architectural, cultural and social considerations.

The Natural Environment

183. Reflecting the Government's 25 Year Environment Plan, the NPPF places great weight on protecting and enhancing Greater Norwich's rich natural environment. It seeks to ensure that development not only avoids harm to natural environmental assets, but also encourages a local plan policy approach which actively protects, promotes and enhances biodiversity, so that development results in biodiversity net gain.

184. A key means of achieving biodiversity net gain is through the NPPF requirement that local plans *take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.* The development of a multi-functional green infrastructure network was formalised locally through the Joint Core Strategy in 2011. It is essential that the network continues to be developed into the long-term as green infrastructure aims to link fragmented habitats, allowing the movement of species. It also has other benefits such as reducing flood risk and promoting active travel.

185. Tools such as the Defra biodiversity metric should be used to demonstrate the expected biodiversity net gain that will be achieved through development.

186. The Environment Bill is currently being considered by Parliament. If implemented as it is currently intended, it will make biodiversity net gain mandatory for all development above specified threshold sizes. If this happens, the policy will be amended in the submission plan to reflect this.

187. An interim Habitats Regulations Assessment (HRA)[73] has been published. It identifies in detail how internationally designated ecological habitats and wildlife sites in the wider area, including the Broads and the Norfolk coast, would potentially be impacted by recreational pressures likely to be generated by growth in Greater Norwich. The policy therefore sets a requirement that development mitigates impact on sites protected under the Habitats Regulations Directive.

188. The HRA identifies a range of mitigation measures to alleviate additional recreational pressure from additional growth planned in the Greater Norwich Local Plan. These include interventions at the sites themselves, providing suitable alternative natural green space (known as SANGS) and the implementation of a wider programme of green infrastructure improvements.

189. The HRA provides further information on SANGS, stating that this could take the form of a new country park containing woodland and waterbodies. This would be in addition to the new country park facilities which are already planned for the Growth Triangle.

190. The Joint Core Strategy identified the potential to create a new country park at Bawburgh Lakes to the west of Norwich. It would complement the existing country park to the east of the city at Whitlingham, with the parks linked by the Yare Valley green corridor. Its establishment remains desirable. However, the policy is not site specific as other opportunities, such as a potential country park in woodland to the north west of Horsford may be identified either through local green infrastructure strategies or through other means. New small-scale country parks, such as at Ladybelt Country Park in East Carleton, can provide valuable additional green infrastructure[74].

191. A Norfolk-wide study, the Green infrastructure and Recreational Impact Avoidance and Mitigation Strategy, has been commissioned. The results of this will inform the final approach to mitigation taken in the submission version of this plan. The emerging evidence indicates that a specific tariff will be required as part of our mitigation strategy for internationally protected sites, along with a contribution to informal open spaces.

[73] Interim Habitats Regulations Assessment of Greater Norwich Local Plan Issues and Options stage, The Landscape Partnership, 2017

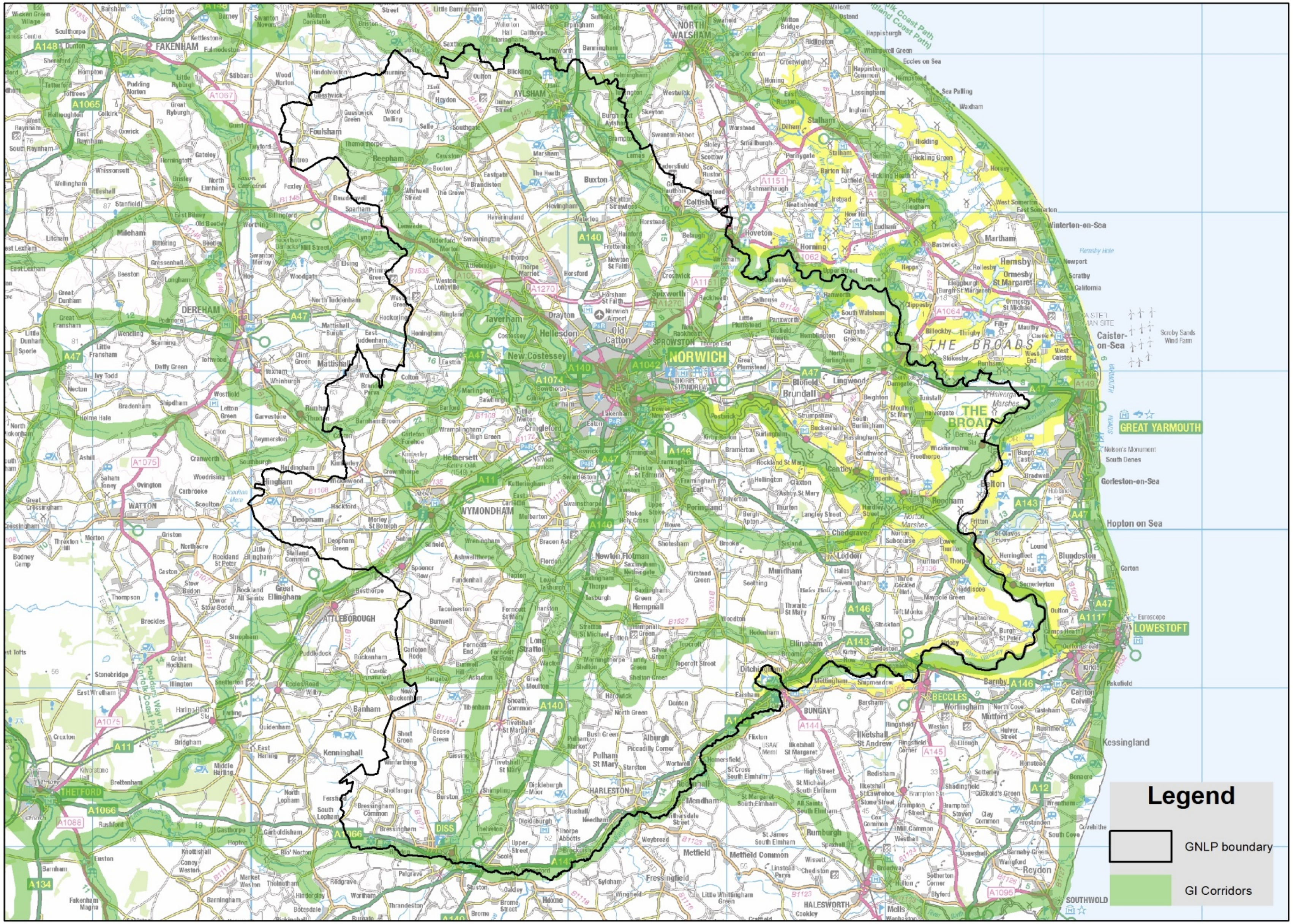
[74] Additional opportunities for the establishment of country parks to provide mitigation, such as at Houghen Plantation in Horsford, will also be progressed so that specific proposals are included in the Regulation 19 version of this plan.

192. The draft Norfolk Strategic Planning Framework includes county-wide policy objectives on environmental protection, landscape protection and biodiversity. Work supporting the emerging NSPF includes a county-wide green infrastructure network map which provides the basis for more detailed mapping to support and inform local plans, including the GNLP. The updated green corridors map for Greater Norwich, including links to neighbouring areas, is in map 2 below.

193. The policy therefore builds on the success of the JCS to ensure both continued long-term development of the green infrastructure network and that visitor pressure issues on HRA designated sites are addressed. Dependent on changes to Government policy, it is likely that it will be strengthened in the Publication version of the plan to require biodiversity net gain.

Map 8 Green Infrastructure (GI) Corridors (overleaf)

GNLP Corridors



POLICY 3 – ENVIRONMENTAL PROTECTION AND ENHANCEMENT

The Built and Historic Environment

The development strategy of the plan and the sites proposed for development reflect the area's settlement structure of the city, towns and villages, retaining the separate identities of individual settlements.

Development proposals will be required to conserve and enhance the built and historic environment through:

- **being designed to create a distinct sense of place and enhance local character taking account of local design guidance and providing measures such as heritage interpretation to further the understanding of local heritage issues;**
- **avoiding harm to designated and non-designated heritage assets and historic character, and minimising harm if this is not possible;**
- **providing a continued or new use for heritage assets whilst retaining their historic significance.**

Greater levels of protection will be provided according to the statutory status and quality of the built and historic asset.

The Natural Environment

Development proposals will be required to conserve and enhance the natural environment. Key elements of the natural environment include valued landscapes, biodiversity including priority habitats, networks and species, geodiversity, high quality agricultural land and soils. Greater levels of protection will be provided according to the statutory status and quality of the natural asset.

Development should deliver biodiversity net gain wherever possible.

To enhance the natural capital of Greater Norwich, the natural assets and connections between them which form the Green Infrastructure Network illustrated in map 8 will be protected and enhanced. Protection will be achieved through effective management of development in accordance with the policies of the development plan. Enhancement will be achieved through the provision of on-site green infrastructure as appropriate and co-ordination of infrastructure funding and investment, including the Community Infrastructure Levy. This may include the establishment of a new country park or parks, along with additional forms of green infrastructure identified through local green infrastructure strategies.

All housing development is required to mitigate impact on sites protected under the Habitats Regulations Directive.

Alternative approaches

The Built and Historic Environment

The policy delivers the NPPF and follows typical practice. No alternative to the overall approach has been identified.

The Natural Environment

The policy requirements are based on the NPPF and evidence from the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy. Since Greater Norwich and surrounding areas of Norfolk have several designated ecological sites of international importance, increased visitor impact on these sites resulting from growth in the area must be addressed. The policy provides appropriate mitigation to allow development to go ahead and supports the principles of protecting habitats and promoting biodiversity net gain currently established through the NPPF. As it is a legal requirement to protect the internationally important habitats, no alternatives are identified to the overall approach.

Consultation Questions for Policy 3 – Environmental Protection and Enhancement

20. Do you support, object or have any comments relating to approach to the built and historic environment?
21. Do you support, object or have any comments relating to the approach to the natural environment?
22. Are there any topics which have not been covered that you believe should have been?

POLICY 4 – STRATEGIC INFRASTRUCTURE

Introduction

194. The National Planning Policy Framework states that strategic policies should make provision for infrastructure for transport, water, energy, health, education and green infrastructure. This plan is supported by evidence in the Greater Norwich Local Plan Infrastructure Report (GNLPIR)[75].

195. As set out in the vision and objectives and the Delivery Statement, delivery of new infrastructure is a priority for the plan. It provides benefits for new and existing communities and is essential to ensure growth is sustainable.

196. This policy focusses primarily on the timely delivery of strategic infrastructure to support growth. The infrastructure will be provided by a range of organisations and through a variety of funding sources as detailed in appendix 1. The appendix sets out infrastructure currently identified to support growth from organisations such as utilities companies and health care providers. Since these may be subject to change over time, the Greater Norwich Infrastructure Plan, which supports implementation of the GNLP, will update the information in appendix 1 of this plan annually to take account of any changes.

197. As needs may change over time, particularly because of technological changes, the delivery of development will not necessarily be dependent on the specific infrastructure identified in the appendix.

198. To promote good local access to facilities, the policy also sets a requirement for development to provide or support local infrastructure, services and facilities. This can be directly through providing land, or indirectly through financial contributions which can include providing good access to existing services and facilities.

199. The policy therefore covers strategic transport, energy, water, health and education needs, with a cross reference to other policies in the plan which cover strategic green infrastructure and more local needs.

Transport

200. A well-functioning transport system and access to jobs, services and information is vital to the economy of the area and the well-being and quality of life for residents. Making the most of existing transport infrastructure and providing the additional infrastructure required to support growth will help support delivery of the GNLP. To support emissions reductions, it is also important to promote modal shift to active travel and clean public transport, and to support electric vehicle use in a time of rapid technological change.

201. Section 9 of the NPPF covers transport issues. It states that transport should be considered from the earliest stages of plan making, to address the potential impacts of development, take advantage of existing and proposed infrastructure and new technology and promote public transport, walking and cycling. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and

[75] The GNLPIR covers: transport; utilities; education; health care; police; fire and rescue; community facilities (libraries and community centres); sport and leisure facilities; green infrastructure and waste management.

public health. It also recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.

202. National, regional and local (county) proposals for transport measures include consideration of the growth needs identified by local plans, integrating development with transport infrastructure needs. Government plans for major roads and there are regional strategies for railways. County led strategies provide for locally significant transport infrastructure. The recognition of and support for transport improvements in the GNLP can be of considerable assistance in applying for funding. The policy consequently identifies and supports strategic and local transport improvements.

203. Trunk road (the A11 and A47) improvements are planned by Highways England. In October 2017 it announced a timetable for £300 million of A47 improvements[76] which will dual parts of the road between Peterborough and Great Yarmouth. Contracts were awarded in September 2019 for the three schemes In Greater Norwich:

- Blofield to North Burlingham[77] planned start date 2020-21, planned end date December 2022;
- Thickthorn junction planned start date 2020-21, planned end date 2023[78];
- East Tuddenham to Easton improvement planned start date 2022, planned end date 2023-24[79].

204. Government has also announced a Major Road Network (MRN). The MRN comprises local non-trunk roads of national importance and the announcement comes with a fund for improvement. Within the Greater Norwich area, this includes the A140 north and south of Norwich (including the A1270 Broadland Northway) and the A146 connecting Norwich to Lowestoft. Improvements at Hempnall Crossroads are being delivered and a bid for MRN funding to support delivery of the Long Stratton bypass is being developed and an announcement is anticipated in the final quarter of 2019.

205. A new nine year East Anglian rail franchise commenced in October 2016. This is delivering significant improvements to rail services including more services and faster journeys across the network. Two daily trains are already providing 90-minute journey times between Norwich and London, with plans in place for Norwich to Cambridge services to be extended to Stansted Airport. In addition, long-term development of a direct rail link to Milton Keynes, Oxford and the West remains a priority.

206. Two new railway stations are planned for the area. The Growth Triangle Area Action Plan identifies new station sites on the Norwich to Sheringham line at Rackheath and Dussindale to serve these major employment and housing growth areas. Dussindale station has outline planning consent.

207. Local transport strategy for the Norwich area is shaped by Norfolk County Council's third local transport plan (2011) and the Norwich Area Transportation Strategy (2013) (NATS). A fourth local transport plan (LTP4) is being progressed together with a review of NATS, known as the Transport for Norwich Strategy (TfN). LTP4 and TfN are being prepared alongside the GNLP.

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[76] https://www.gov.uk/government/news/timetable-outlined-for-300-million-a47-improvements
[77] https://highwaysengland.co.uk/projects/a47-blofield-to-north-burlingham/
[78] https://highwaysengland.co.uk/projects/a47-thickthorn-junction/
[79] https://highwaysengland.co.uk/projects/a47-north-tuddenham-to-easton-improvement-scheme/

208. TfN will include measures to improve walking, cycling and public transport facilities to support significant modal shift in the urban area during the plan period. This will be required to assist in meeting national targets to achieve zero carbon development by 2050. The measures are likely to feature improvements to sustainable transport networks and interchanges, including Park and Ride enhancements, and a cross valley bus link between UEA and the remainder of Norwich Research Park. Road improvements to enable the other measures are also being considered.

209. In the short term, the Norwich area has been successful in securing a place in Government's Transforming Cities (TC) programme which has the potential to bring significant investment to the transport networks in the city and surrounding area. The TfN review is being developed alongside the emerging TC programme. As work is ongoing in relation to sustainable transport projects, it is likely that greater detail on specific projects will be contained in the submission version of this plan in 2020.

210. Norfolk County Council has identified the Norwich Western Link as one of its infrastructure priorities. Work continues to develop the scheme in readiness to submit a business case for a large local major scheme to the Department for Transport (DfT). As it develops, the GNLP will reflect progress towards delivery of the scheme and when a route is formally adopted it will need to be shown in the GNLP.

211. Transport improvements outside the Transport for Norwich area are dealt with on a local basis. The county council has commenced a programme of Market Town Network Improvement Strategies (NIS). These strategies identify short, medium and long-term actions including the issues associated with long-term growth. Diss was included in the first tranche and will be completed by the end of 2019. Wroxham/Hoveton, Aylsham and Wymondham are in tranche 2 and are at earlier stages of development.

212. The policy recognises that Greater Norwich is a mixed urban and rural area in which travel and access issues vary, with the use of the private car being particularly important to the rural economy. It is anticipated that the shift to electric vehicles will assist in reducing emissions in rural areas.

213. Strategic transport improvements in policy 4 include rail and airport improvements, along with road improvements including dualling of the A47, the Long Stratton by-pass and the Norwich Western Link Road.

214. The policy also supports the TfN strategy and identifies this as the detailed means by which transport improvements across the urban area of Norwich will be developed and delivered, including encouraging walking and cycling, and improving public transport.

215. The transport element of the policy will evolve as the work to develop TfN strategy, LTP 4, Transforming Cities programme and Network Improvement strategies continues. This will allow both the policy and the GNLP implementation plan to be more specific and identify any relevant wider transport targets and measures to be captured beyond those required to support growth in the GNLP.

Other strategic infrastructure

Energy

216. The Greater Norwich Energy Infrastructure Study (March 2019) concludes that failure to address local energy constraints through local plan policy could threaten the delivery of growth in this plan. These result partly from regulatory barriers to network operators investing in new energy supply infrastructure. Reflecting the requirements of the NPPF, the study highlights the importance of having both positive energy efficiency polices and policies to promote sustainable energy development. This will help both to address climate change and to overcome network constraints.

217. The policy reflects the recommendations of the study in relation to improving network supply capacity. Policy 2 reflects its recommendations through policies which aim to reduce the carbon emissions, promote local energy networks and minimise energy demand in new developments.

218. Therefore, the policy commits the Greater Norwich authorities to lobbying for improvements to the capacity of the energy supply network by the service provider, UK Power Networks to ensure improvements are delivered to serve growth needs and/or to innovative approaches which could off-set the need for capacity improvements. It particularly highlights the substations at which the study identifies capacity concerns. These are at Sprowston, Peachman Way (Broadland Business Park), Earlham and Cringleford.

Water

219. Water supply and disposal infrastructure in Greater Norwich is provided by Anglian Water (AW). Strategic plans, which take account of planned growth and climate change and are subject to Habitats Regulation Assessment (HRA), are in place and are being updated for both water supply and disposal.

220. Water supply in Greater Norwich is from groundwater sources and from a river intake from the Wensum. There has been significant recent investment in the river intake to protect water quality in this internationally designated chalk river habitat.

221. The emerging water resources plan[80] does not require additional spending on water supply infrastructure to serve growth in Greater Norwich. Investment is planned to transfer water from the Norwich and the Broads water resource zone (WRZ) to the neighbouring Happisburgh and Norfolk Rural North WRZs. As a result, the policy does not cover water supply infrastructure as investment is not required to support the growth promoted in this plan.

222. The strategic focus for water supplies throughout the Anglian Water area, which covers much of eastern England, is to promote demand management and leakage reduction, along with a strategic grid to serve other parts of East Anglia and Lincolnshire. This is in line with the pioneering long-term approach taken in Greater Norwich. Water efficiency is now required by the Norfolk Strategic Planning Framework for local plans across the county (see policy 2 of this plan).

[80] AW Revised Draft Water Resources Management Plan 2019

223. To address growth needs in Greater Norwich, AW[81] identifies the Yare Valley Sewer as one of the two strategic sewer investment requirements in its whole area. Increasing capacity at Whitlingham Water Recycling Centre (WRC) is also a strategic priority in AW's plan.

224. In line with the long-term approach taken in Greater Norwich, and as required by the NSPF and policy 2 of this plan, AW also promotes the use of sustainable drainage (SuDS) to reduce waste water infrastructure investment requirements.

225. Smaller scale measures to address growth needs for Acle, Aylsham, Belaugh and Wymondham WRCs are planned through AW's water recycling plan. These are to improve capacity and protect water quality and are referenced in appendix 1. Improved monitoring is also planned for WRCs.

226. Funding for water infrastructure improvements is provided through a standard charge levied by AW on all new homes. Taking account of the above evidence, the policy therefore commits the Greater Norwich authorities to lobbying for the timely delivery of improvements to the waste water network by AW.

227. The Greater Norwich Water Cycle Study, currently in production, will provide further information on these issues.

Education

228. Norfolk County Council is responsible for planning for education infrastructure. Evidence in the GNLPIR shows that school capacity to serve growth will be met both by improvements to existing schools and through new schools being provided.

229. As a rule, if a new development is likely to generate enough children to fill a new school, Norfolk County Council asks developers for the full cost of building that school. A pro rata contribution of the full cost is requested if numbers of children are calculated to be less than 420, a two-form entry primary school. With the current CIL approach locally, only land can be secured through a S106 agreement and the build cost of the new school is claimed through CIL.

230. Appendix 1 provides details of new schools to serve growth. Sites in this plan and other local plan documents include locations for new schools. The requirement for a new high school in the North East growth area, provided for by a site at Beeston Park in the area action plan, is specifically identified in the policy 4 due to its strategic significance.

231. The policy provides flexibility for the provision of new schools to take account of changing circumstances and allow for the timely delivery of schools when and where they are required. The information in appendix 1 will be updated annually through the Greater Norwich Infrastructure Plan (GNIP), or any successor, to ensure that it is up-to-date.

Health Care

232. Forward planning for healthcare services is a high priority. The Greater Norwich Local Plan Infrastructure Report includes the need for health care infrastructure established through the Health Infrastructure Delivery Plan (HIDP) drawn up by the Sustainable Transformation Panel (STP). The HIDP has been produced in collaboration with the local Clinical Commissioning Groups

[81] Through the AW Water Recycling Long Term Plan (2019) which is available here

(Norwich, North Norfolk and South Norfolk) and NHS Foundation Trusts (Norfolk and Norwich University Hospital, Norfolk Community Health and Care and the Norfolk and Suffolk trusts).

233. The HIDP aims to promote the allocation of land for healthcare uses, securing land by planning obligations from developers, or negotiating contributions to expand existing buildings and facilities. The HIDP also identifies a range of potential funding sources to provide for growth requirements, including loans, disposals and partnerships.

234. A full estate strategy is being developed which will impact on the infrastructure requirements from the HIDP included in this plan. Therefore, only currently identified issues are included this draft strategy. Updated information will be provided in the trust's completed strategy, scheduled for 2020. This will be included in the GNLP.

235. The needs resulting from growth in Greater Norwich identified in the study are set out in appendix 1.

POLICY 4 - STRATEGIC INFRASTRUCTURE

Strategic infrastructure improvements will be undertaken to support timely delivery of the Greater Norwich Local Plan and the wider growth needs of the area. Key elements will be:

Transport

Transport improvements will support and embrace new technologies and develop the role of Norwich as the regional capital, support strategic growth in the Cambridge Norwich Tech Corridor, improve access to market towns and rural areas and promote sustainable and active transport.

Transport infrastructure will be brought forward to support the development aims of this plan. A considerable shift towards non-car modes will be promoted in the Norwich urban area over the plan period. High density growth will be focussed in locations with good access to improved sustainable transport networks and interchanges in Norwich, creating a virtuous cycle where clean transport is prioritised, less use is made of cars and space is used more efficiently and attractively.

This will be achieved by:

- **Implementation of the Transport for Norwich Strategy including:**
    - **significant improvements to the bus, cycling and walking network to promote modal shift;**
    - **developing the role of the park and ride system;**
    - **a cross valley bus link between the University of East Anglia and the rest of Norwich Research Park;**
    - **delivery of the Norwich Western Link road.**
- **Enhancement of the Major Road Network including provision of the A140 Long Stratton bypass.**
- **Protection of the function of strategic transport routes (corridors of movement).**
- **Supporting improvements to the A47, including delivery of the Blofield to North Burlingham, Thickthorn and Easton to East Tuddenham improvements being progressed by Highways England.**
- **Promoting enhancement of rail services, including improved journey times and reliability to London and Cambridge, supporting the East-West Rail link and innovative use of the local rail network.**
- **Continued investigation of and support for rail freight opportunities.**
- **Supporting the growth and regional significance of Norwich Airport for both leisure and business travel to destinations across the UK and beyond.**
- **Continuing to improve public transport accessibility to and between main towns and key service centres, taking account of Norfolk County Council's market towns network improvement strategies.**

Other Strategic Infrastructure

The Greater Norwich local authorities and partners will lobby for the timely delivery of improvements to infrastructure, including that set out in appendix 1 and to:

- **The energy supply network including increased capacity at primary substations at Cringleford, Peachman Way, Sprowston and Earlham Grid Local and/or innovative smart solutions to off-set the need for reinforcement;**
- **the waste water network, at Whitlingham water recycling centre and the Yare Valley sewer,[82] to protect designated habitats;**

[82] Clarification dependent on Water Cycle Study

- **health care infrastructure.**

School capacity will be increased to provide for growth by improvements to existing schools and the provision of new schools as required, including primary schools on strategic development sites and a new high school in the North East growth area as identified in appendix 1.

In line with other policies in this plan, a multi-functional strategic green infrastructure network will be further developed as set out in map 8.

<u>On-site and local infrastructure, services and facilities</u>

Development proposals will provide on-site services and facilities and support local infrastructure capacity improvements through on-site provision, providing land and developer contributions.

<u>Alternative approaches</u>

As required by the NPPF, policy 4 and appendix 1 identify the strategic and local infrastructure required to meet growth needs and support their delivery by relevant bodies.

The content is informed by the Greater Norwich Local Plan Infrastructure Report which summarises the findings of several other strategies and evidence studies for a wide range of infrastructure needs including transport, energy, water, health and education.

Infrastructure provision is primarily the responsibility of partner organisations including the Highways Agency, Norfolk County Council and utilities providers. It is their strategies which will mainly be responsible for delivering the infrastructure required to support growth. The policy does not seek to prioritise between different infrastructure projects or types as the preferred approach is to be flexible enough to deal with changing circumstances and opportunities, and the different bodies responsible for delivery. Prioritisation might be an alternative approach if it could be evidenced and justified.

The policy’s content is informed by the best available information at present which will be updated to reflect progress on schemes. Delivery will be promoted, monitored and managed through the Greater Norwich Infrastructure Plan.

Consultation Questions for Policy 4 – Strategic Infrastructure

23. Do you support, object or have any comments relating to approach to transport?
24. Do you support, object or have any comments relating to the approach to other strategic infrastructure (energy, water, health care, schools and green infrastructure)?
25. Do you support, object or have any comments relating to the approach to on-site and local infrastructure, services and facilities?
26. Are there any topics which have not been covered that you believe should have been?

POLICY 5 – HOMES

236. The NPPF states that the Government's objective is to significantly boost the supply of homes. The GNLP addresses this through the housing strategy in policies 1 and 7 and the housing allocations in the Sites document.

237. The NPPF also states that major housing developments should meet the need for affordable housing on-site, with at least 10% of the affordable homes available for affordable home ownership. The NPPF puts the emphasis on local plans to identify the amount of affordable housing needed. It also requires local plans to provide a mix of property types and sizes and a variety of affordable housing tenures, as well as meeting the needs of all groups in the community.

238. To achieve the above and based on local evidence[83], the policy encourages the provision of a full range of type, tenure and cost of housing, to meet the varied housing needs of our community. It also included minimum space standards and requirements for adaptable homes to provide an improved quality of life and meet the needs of an ageing population.

239. The policy is flexible in relation to affordable housing sizes, types and tenures to allow differing needs to be met in the three districts on a site by site basis based on the most up-to-date evidence. Paragraph 43 covers the housing mix requirement based on the most recent housing market assessment. Current evidence shows a higher social rented requirement in the city with a wider range of tenure options suitable in Broadland and South Norfolk. This evidence will be revisited in 2020. The policy is pragmatic and adaptable, enabling the most up-to-date evidence on housing need to be used.

240. The policy sets a general requirement for on-site affordable housing provision of 33% on sites that show better viability based on local evidence, with a lower requirement in Norwich City Centre. This is based on:

- The Strategic Housing Market Assessment 2017 which identifies a need for 11,030 affordable homes in Greater Norwich from 2015 to 2038, 28% of the total housing need identified at that point;
- Under national policy, small sites under 10 dwellings are not required to provide affordable housing. Larger sites will therefore have to ensure that overall affordable housing need is delivered;
- The most recent viability study findings which conclude that centrally located brownfield sites which have higher development costs which affect viability are generally able to provide 28% affordable housing;
- Some specific sites have very high costs associated with development. These are allocated with lower affordable housing requirements.

241. The successful approach of preventing subdivision of sites currently in use in Norwich is applied to the whole area through the policy.

242. Development proposals should consider the need for wheelchair adapted homes which meet the Building Regulation M4 (3) standard or any successor. This is not set as a policy requirement but is encouraged within Greater Norwich where viable.

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[83] Local housing evidence is in the Strategic Housing Market Assessment (2017) and in the Greater Norwich Viability Study (2019).

243. Based on local evidence of need, viability and timing[84] and to ensure that new housing provides for a good quality of life, the policy requires housing development across Greater Norwich to meet nationally defined minimum space standards[85] for different types of homes.

244. An increasing proportion of the population is over 65 or disabled, increasing the demand for supported accommodation such as sheltered housing, extra care housing and care homes, residential care and supported living. The local plan seeks to assist Norfolk County Council's aim to reduce residential care home and nursing home dependency and support people to remain more independent in their own homes or in supported housing.

245. The policy therefore supports the provision of housing to meet the needs of older people and others with support needs, including sheltered housing, residential/nursing care accommodation and extra care housing[86]. Norfolk County Council's strategy[87] identifies the need for 2,842 additional extra care units by 2028. The policy includes locally requiring the national optional Building Regulation standard for adaptable homes. To do so, the policy requires 20% of homes on major developments to be designed to be adaptable to meet changing needs over time, thus enabling people to stay in their homes longer.

246. The policy provides for the needs of Gypsies and Travellers. Evidence[88] shows planned expansion of the Swanton Road site in Norwich meets Greater Norwich's need for 15 additional pitches to 2022. A further 51 pitches will be required between 2022 and 3028. The criteria-based policy allows for additional delivery to meet need throughout the plan period and allows for the expansion of well-located existing sites. Since no sites have been submitted for consideration through the local plan up to now, site owners have been written to, requesting more sites to be submitted or extensions to existing sites. The intention is to identify additional sites with the potential for allocation, as well as having this criteria-based policy to allow further sites to come forward.

247. The policy also allows for Travelling Show People and Residential Caravan needs to be met through market led solutions through the criteria-based policy. This will allow sites to come forward if there is demand for them. The Broads Authority plans for the needs for residents of houseboats in the area.

248. The policy also aims to ensure that purpose-built student accommodation is provided to meet growing needs at the UEA and in other locations with good access to the educational facilities they will serve, including Norwich University of the Arts. The policy content and the sites allocated for student accommodation are informed by the UEA Development Framework Strategy. Purpose-built student accommodation development is required to make provision for affordable housing that would be expected on the specific site if it were to be developed for housing, potentially through a commuted sum. This is required as without doing so, the delivery of sites for student accommodation would reduce the ability to address affordable housing needs.

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[84] Evidenced through the Greater Norwich Local Plan Nationally Descibed Space Standards Study (August 2019)

[85] The Nationally Described Space Standard is available here

[86] Extra care housing is a self-contained residential accommodation (where units are rented or owned by the individual or couples who occupy them) with communal facilities designed to meet the needs and aspirations of older people and have care staff on site 24/7.

[87] Living Well – Homes for Norfolk (2018)

[88] Norfolk Caravans and Houseboats Accommodation Needs Assessment (ANA) including for Gypsies, Travellers and Travelling Show people October 2017

249. Local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom-build housing. In 2018/19, there were 113 people on the registers in Greater Norwich.

250. In line with the Right to Build and the NPPF, self and custom-build housing delivery is promoted through the GNLP on a range of sites. This policy sets a requirement for larger sites to provide self and custom-build plots. The thresholds have been set to ensure that plots are provided across Greater Norwich. Policies 7.4 and 7.5 also promote self and custom-build on smaller scale windfall sites. Overall, this comprehensive approach will both increase the supply of housing in urban and rural areas and provide opportunities for small and medium enterprises to build houses, as well as for self-build.

251. Other potential means of helping to provide for local housing needs is through the provision of live-work units and through community led housing initiatives, such as might be provided by a Community Land Trust. Such initiatives will need to be in appropriate locations.

POLICY 5 – HOMES

Residential proposals should address the need for homes for all sectors of the community having regard to the latest housing evidence, including a variety of homes in terms of tenure and cost. New homes should provide for a good quality of life in mixed and inclusive communities and major development proposals should provide adaptable homes to meet varied and changing needs.

This will be achieved as follows:

Affordable Housing

Major residential development proposals[89] and purpose-built student accommodation will provide:

- **at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28%, unless the site is allocated in this plan or a Neighbourhood Plan for a different percentage of affordable housing;**
- **affordable housing on-site except where exceptional circumstances justify off-site provision;**
- **a mix of affordable housing sizes, types, and tenures in agreement with the local authority, taking account of the most up-to-date local evidence of housing need. This will include 10% of the affordable homes being available for affordable home ownership where this meets local needs;**
- **affordable housing of at least equivalent quality to the market homes on-site.**

The sub-division of a site to avoid affordable housing provision will not be permitted.

Space Standards

All housing development proposals must meet the Government's Nationally Described Space Standard for internal space or any successor.

Accessible and Specialist Housing

Development proposals providing specialist housing options for older people's accommodation and others with support needs, including sheltered housing, supported housing, extra care housing and residential/nursing care homes will be supported on sites with good access to local services including on sites allocated for residential use.

Proposals are particularly encouraged where Norfolk County Council identifies a strategic need for extra care housing.

To meet changing needs by providing accessible and adaptable homes, proposals for major housing development are required to provide at least 20% of homes to the Building Regulation M4(2)[1] standard or any successor.

Gypsies and Travellers, Travelling Show People and Residential Caravans

[89] 10 dwellings or more

Development for Gypsy and Traveller sites, Travelling Show People sites and residential caravans will be acceptable where proposals:

- **have safe and sustainable access to schools and facilities;**
- **have suitable vehicular access;**
- **provide for ancillary uses and landscaping;**
- **are of a scale which is in keeping with its surroundings, including small-scale extensions to existing sites.**

For transit pitches the following additional criteria apply:

- **the site is conveniently accessible to the main 'A' and 'B' class road network; and,**
- **an agreement is in place for satisfactory site management, including the maximum period and frequency of stay.**

Purpose-built Student Accommodation

Development proposals for purpose-built student accommodation will be supported at the UEA campus where they are in accordance with the UEA Development Framework Strategy (DFS).

Away from UEA campus, proposals for purpose-built student accommodation will be supported where the need for the development is justified by the current or proposed size of Norwich's higher educational institutions and the proposal will:

- **be in a location otherwise suitable for residential development with sustainable access to the institutions served;**
- **be of a scale large enough to provide for high standards of student welfare;**
- **contribute to a mixed and inclusive neighbourhood, not dominating existing residential communities;**
- **provide a mix of accommodation types for a wide range of students; and**
- **make provision for the delivery of a quantum of affordable housing that would be expected if the site were developed for general needs housing. Such provision may be made off-site through a commuted sum as set out in supplementary planning documents.**

All consents will be restricted so the use of the accommodation is secured for students only.

Self/Custom-Build

Except for flats, at least 5% of plots on residential proposals of 40 dwellings or more should provide serviced self/custom-build plots unless:

- **a lack of need for such plots can be demonstrated;**
- **plots have been marketed for 12 months and have not been sold.**

Alternative approaches

Affordable Housing

As required by the NPPF, the affordable housing elements of the policy are based on local evidence of need and provide the flexibility to deliver different types and tenures of home within the three districts, so no alternative approach has been identified.

Space Standards

National planning policy is clear that the nationally described space standards can be applied where the need for an internal space standard can be justified. Local evidence[90] shows that 75% of homes in Greater Norwich were delivered to these standards between 2016 and 2018. The requirement is therefore considered deliverable. Setting a lower percentage than 100% could be an alternative approach but is not preferred as minimum space standards are considered necessary to support a good quality of life for residents of new homes.

Accessible and Specialist Housing

To ensure that every day needs can be met effectively, and active lifestyles for residents are supported, the policy requires this type of development to be in locations with good access to services. No alternative approach has been identified.

The policy requirement for **adaptable housing** is justified by the high and growing elderly population in the area. A higher or lower percentage could be alternatives but are not preferred. While a higher percentage would provide greater flexibility and choice for residents it would have a greater impact on viability. A lower percentage would have less impact on choice and flexibility and will make it harder to meet needs.

Gypsies and Travellers, Travelling Show People and Residential Caravans

Evidence shows short term need can be met through current permissions and the policy approach allows the expansion of well-located existing or new sites. Allocation of sites to provide choice and longer-term certainty is an alternative approach but no sites have been submitted. This consultation encourages new site to be submitted.

Purpose-built student accommodation

Concentrating purpose-built student housing in accessible locations in relation to further educational establishments and suitable for residential development is the preferred option as it is will ensure sustainable travel patterns, thus no alternative approach has been identified.

The requirement for off-campus, purpose-built student accommodation to contribute to meeting affordable housing needs is the preferred option because such accommodation takes up sites that would otherwise contribute to the provision of affordable housing. No alternative approaches are identified due to the need to provide for both types of accommodation.

Self/Custom-Build

[90] Evidenced through the Greater Norwich Local Plan Nationally Described Space Standards Study (August 2019)

Requiring larger sites to contribute self/custom build plots implements the NPPF's support of custom-build housing. An alternative threshold and/or percentage might be justified if it can achieve the same ends.

Consultation Questions for Policy 5 – Homes

27. Do you support, object or have any comments relating to approach to affordable homes?
28. Do you support, object or have any comments relating to the approach to space standards?
29. Do you support, object or have any comments relating to the approach to accessible and specialist Housing?
30. Do you support, object or have any comments relating to the approach to Gypsies and Travellers, Travelling Show People and Residential Caravans? **To help to meet long term need, this consultation specifically invites additional sites for Gypsy and Traveller accommodation, either on new sites or as extensions to existing sites.**
31. Do you support, object or have any comments relating to the approach to Purpose-built student accommodation?
32. Do you support, object or have any comments relating to the approach to Self/Custom-Build?
33. Are there any topics which have not been covered that you believe should have been?

POLICY 6 – THE ECONOMY

252. This local plan aims to deliver inclusive economic growth. It supports and delivers the ambitions of the New Anglia LEP's Norfolk and Suffolk Economic Strategy and Local Industrial Strategy, the Cambridge Norwich Tech Corridor initiative, and the enhanced growth outlined in the Greater Norwich City Deal.

253. The Norfolk and Suffolk Economic Strategy (NSES) recognise Norwich and Greater Norwich as one of six "priority places". Greater Norwich is also a key location within two other priority places; the A47 corridor and the Cambridge-Norwich corridor.
The NSES identifies nine key economic sectors of:

- energy;
- life sciences and biotech;
- ICT, tech and digital creative;
- advanced agriculture, food and drink;
- visitor economy, tourism and culture;
- financial services and insurance;
- transport, freight and logistics;
- construction and development;
- advanced manufacturing and engineering;

254. The promotion of Norfolk and Suffolk as the "UK's clean growth region" sits at the heart of New Anglia's Local Industrial Strategy (LIS). It focusses on three high growth sectors: clean energy, agri-food and ICT/digital. All the NSES and LIS sectors are represented in Greater Norwich and relevant businesses are found throughout the area. In addition, there are important concentrations of the LIS priority sectors in strategic employment locations: Norwich Airport plays a key role in servicing the off-shore energy industry; Norwich Research Park and the Food Enterprise Park are crucial to the success of the agri-food sector; and, the city centre is home to a growing ICT/digital cluster. The high environmental standards promoted through this local plan will support the recognition of the area as the UK's Clean Growth region.

255. The Cambridge Norwich Tech Corridor is an extension of both the Oxford Cambridge Arc and the London Stansted Cambridge corridor. The A11 coupled with Cambridge to Norwich train services provide the linking transport infrastructure. Greater Norwich includes key economic assets supporting the CNTC – notably Norwich and its city centre, the Norwich Research Park (including UEA and the Norfolk and Norwich University Hospital (NNUH)), the Food Enterprise Park, Norwich Airport and Hethel Engineering Centre.

256. Evidence in the Employment, Town Centre and Retail study (GVA 2017)[91] investigated both "business as usual" and the potential for enhanced economic growth. It demonstrates that committed employment land is more than sufficient in quantity and quality to meet the potential for enhanced growth. The enhanced growth scenario forecasts around 45,000 jobs in the period 2015 to 2036. In the period 2015 to 2018 the East of England Forecasting Model (EEFM) suggests that around 15,000 jobs were delivered. This leaves the enhanced growth potential for around 30,000 jobs in the period 2018 to 2036. This is an uplift of around 8,000 on the EEFM business as usual forecast and is consistent with City Deal ambitions. Since the evidence was produced the Local Plan period has been extended to 2038 and, based on the EEFM, the target is extended to 33,000 jobs 2018 to 2038.

[91] Link to be added

257. The policies of this plan seek to grow the local economy in a sustainable way to support jobs and inclusive economic growth in both urban and rural locations. This will:

- provide jobs and services for a rising population and develop Greater Norwich's role as an engine of the regional economy;
- facilitate enhanced growth potential with a target of at least 33,000 additional jobs in the period 2018-2038;
- support the key sectors identified in the NSES and LIS and help increase the proportion of higher value, knowledge economy jobs; while ensuring that opportunities are available for development that can support all types and levels of jobs in all sectors of the economy and for all the workforce
- be supported by investment strategies that focus on overcoming constraints to the release and development of key employment sites

258. The Norwich urban area and in particular the city centre has a key role to play in providing the employment needed to support the housing growth proposed across the Greater Norwich area, through significant employment generation in the city centre. Evidence shows that Norwich's economic dynamism underpins the regional economy; if Norwich's economy flourishes, it will benefit the adjoining rural settlements in the county and beyond. A key part of retaining and growing employment in the city centre will be to reverse the loss of office accommodation in the city centre, as required by policy 1 of this plan, which has experienced a 25% reduction since the start of the Joint Core Strategy plan period in 2008[92].

259. Although the Employment Town Centre and Retail study (GVA 2017) concludes that Greater Norwich has enough employment land overall, most of this is out-of-centre and is neither the preferred location for some growth sectors nor the most sustainable place for high intensity employment / office growth. The report highlights key trends in employment activity including a re-urbanisation of business activity back to locations that can offer a broader range of services to employees, and the rise in new start-ups in the creative and media sector which is fuelling demand for space in specific locations allowing for greater interactions, including Norwich city centre. Given that the report also identifies an underlying demand for good quality office and employment space there is a risk that this may lead to new such development going to less sustainable locations with serious impacts on the vitality of the city centre and undermining policies to encourage modal shift. Therefore, it is essential that this plan ensures that high density employment uses are concentrated in highly accessible locations in particular the city centre, and that loss of existing floorspace in the city centre is resisted (see policy 7.1).

260. The Employment Town Centre and Retail study reviewed existing employment sites and allocations and did not conclude that any should be reallocated for other uses. While the study also concluded that there is no overall quantitative need for additional employment sites, 40ha of land at Norwich Airport is newly allocated. The site has the benefit of planning permission and was included as a commitment in the study. Two small sites are also allocated as they are logical extensions to existing strategic sites and provide additional flexibility.

261. Retailing and town centres are currently in a state of flux and policy is restricted to identifying the hierarchy of centres across the area to guide the operation of the "sequential approach" to development. Within town centres a flexible approach will be required to allow centres to diversify while retaining their ongoing role as economic and community hubs. Due to the need to update policy for Norwich city centre, further detail is set out in Policy 7.1.

[92] Source: Greater Norwich annual monitoring reports

POLICY 6 - THE ECONOMY

1. **Sufficient employment land is allocated in accessible locations to meet identified need and provide for choice.**

2. **The needs of small, medium and start-up businesses are addressed through:**
    - **the allocation and retention of smaller scale employment sites across the area;**
    - **encouraging the provision of small-scale business opportunities in all significant residential and commercial developments and through the appropriate use of rural buildings;**
    - **Encouraging flexible building design and innovative approaches in new and existing residential developments to encourage local working and business opportunities.**

3. **Larger scale needs are addressed through the allocation of sufficient land to provide a choice and range of sites, including strategic sites targeted at specific sectors. Investment strategies will ensure that a readily available supply of land is maintained throughout the plan period.**

4. **Land identified for employment uses in this local plan will only be considered for other uses that are ancillary to and supportive of its employment role.**

5. **Tourism, leisure, environmental and cultural industries will be promoted and assisted by:**
    - **the general emphasis in this local plan on achieving high quality design, resource efficiency, environmental enhancement and retention of local distinctiveness;**
    - **implementation of the green infrastructure network;**
    - **encouragement for sustainable tourism initiatives and development that supports cultural industries;**
    - **promotion of the creative industries cluster focussed on the city centre.**

6. **Opportunities for innovation, skills and training will be expanded through facilitating the expansion of, and access to, vocational, further and higher education provision.**

Strategic employment areas

Strategic employment areas and their main uses are:

Strategic Employment area and their primary uses	Existing undeveloped land available (hectares, April 2018)	New allocations (hectares)	Total employment allocations (hectares)
Norwich city centre with a focus on expansion of office, digital and creative industries, retail and leisure provision	30.8 (all part of mixed-use sites)	0	30.8
The Norwich Airport area and in particular: • a new site on the northern edge of the airport accessed directly from the Broadland Northway of	35	40	75

40ha of which at least 50% will be reserved for airport related activities; and • a site of around 30ha at the A140/Broadland Northway junction and focussed on uses benefiting from an airport location			
Browick Interchange, Wymondham (for general employment uses)	**22**	**0**	**22**
Longwater - consolidation of activity at through intensification and completion of the existing allocation	**12**	**0**	**12**
Rackheath (for general employment uses)	**25.6**	**0**	**25.6**
The complex of general business parks at Thorpe St Andrew (Broadland Business Park, St Andrews Business Park and Broadland Gate);	**33.1**	**0**	**33.1**
Norwich Research Park including the Norfolk and Norwich University Hospital and the University of East Anglia; providing for significant expansion of health, higher education and science park activity	**32.7**	**6.9**	**39.6**
Hethel including a technology park of around 20ha managed to focus on advanced engineering and the growth of technology capabilities	**20**	**0.8**	**20.8**
The Food Enterprise Park at Easton/Honingham	**18.7**	**0**	**18.7**
Total	**229.9**	**47.7**	**277.6**

Town Centres

The development of new retailing, leisure, offices and other main town centre uses will be subject to the sequential approach, as defined by government policy and guidance, and will be encouraged at a scale appropriate to the form and functions of the following hierarchy of defined centres:

1. **Norwich city centre**
2. **The town centres of Aylsham, Diss, Harleston and Wymondham, and within the Norwich urban area, the large district centres at Anglia Square/Magdalen Street and Riverside;**
3. **The large village and district centres of: Acle, Coltishall, Hethersett, Hingham, Loddon, Long Stratton, Poringland and Reepham, and within the Norwich urban area at Aylsham Road, Drayton Road, Bowthorpe, Dereham Road, Eaton centre, Earlham House, Larkman centre, Plumstead Road, Old Catton and Dussindale (Thorpe St Andrew). New district centres to be established in accordance with the Growth Triangle Area Action Plan;**
4. **Local centres, including new and enhanced local centres serving major growth locations**

Development should seek to enhance the environment and economy of centres, and of villages with more dispersed services, to protect their function and avoid the loss of commercial premises or local services.

Alternative approaches

Policy 6 implements NPPF requirements, reflects the New Anglia LEP's strategies and priorities, and is informed by local evidence. While no alternative approaches have been identified to the overall approach detailed changes might be justified.

Consultation Questions for Policy 6 – The Economy

34. Do you support, object or have any comments relating to the approach to employment land?
35. Do you support, object or have any comments relating to the approach to tourism, leisure, environmental and cultural industries?
36. Do you support, object or have any comments relating to the sequential approach to development of new retailing, leisure, offices and other main town centre uses?
37. Are there any topics which have not been covered that you believe should have been?

POLICY 7 – STRATEGY FOR THE AREAS OF GROWTH

Introduction

262. Policies 7.1 to 7.4 provide details of the distribution of growth set out in policy 1, along with locationally specific strategic policies for the different areas of growth within Greater Norwich. The policies for these areas follow the settlement hierarchy:

- 7.1 The Norwich urban area including the fringe parishes;
- 7.2 The Main towns;
- 7.3 The Key service centres;
- 7.4 Village clusters.

263. Policy 7.5 provides for small scale windfall development of up to 3 dwellings per parish during the plan period.

264. The GNLP Sites plan provides individual allocations to implement the strategy with the exception of allocations in village clusters in South Norfolk which will be in a separate plan.

Policy 7.1 – The Norwich urban area including the fringe parishes[93]

265. The policy for the Norwich urban area is divided into three sections:

1. The City centre;
2. East Norwich;
3. Elsewhere in the urban area including the fringe parishes.

266. This division reflects:

- i. the importance of the city centre to Greater Norwich as a whole, the rapid change in the role of city centres (particularly in relation to retailing and office employment), and the need to promote brownfield regeneration (particularly in the northern city centre), which together create the necessity for a distinctive, detailed and updated planning framework;
- ii. the potential for brownfield regeneration to create a new urban quarter in the long-term in East Norwich;
- iii. the essential role that of the other parts of the urban area and the fringe parishes will play in meeting housing needs through the growth of strategic and smaller scale extensions and small-scale brownfield redevelopment to support neighbourhood renewal. The area will also play a key role on meeting employment growth needs, providing sites for the growth of both strategic and local employment uses.

267. Housing growth of 30,560 in the area will provide around 69% of the total growth in the GNLP (see policy 1). The Sites document provides policies for each site allocated to deliver these homes.

[93] The Norwich fringe is the built-up parts of the fringe parishes of Colney, Costessey, Cringleford, Drayton, Easton, Hellesdon, Old Catton, Sprowston, Taverham, Thorpe St. Andrew, Trowse and the remainder of the Growth Triangle

The City Centre

268. The NPPF requires local planning authorities to plan positively to ensure that town centres remain vibrant, diverse and viable and recognise the role that they will play at the heart of communities by taking a positive approach to their growth.

269. Norwich city centre is defined in this plan as the area within the city walls, with the addition of Riverside, and areas around the railway station, Norwich City Football Club, and south of the bus station. This is illustrated in map 9 below.

270. Norwich city centre is the pre-eminent regional centre in the East of England, focused on a historic city centre with a wealth of heritage assets and an unrivalled historic and natural environment. It accommodates the majority of jobs, key services and economic, leisure and cultural facilities serving much of Norfolk and north Suffolk. It is within the top 15 retail destinations in the UK and has the highest proportion of its retail floorspace in its centre of any major city in the country largely as the result of long-term restriction of out-of-town development. The established approach to planning for Norwich city centre has been cited as an example of best practice by Government.

271. To date, Norwich city centre has proved remarkably resilient in adapting to the unprecedented challenges arising from wider societal changes in employment patterns, shopping habits and leisure activities.

272. Policy 7.1 details how development will help to shape the city centre to 2038. The centre must continue to be planned in a way which enhances, protects and makes the best use of its distinctive assets and ensures that it remains the focus for the high-value jobs, services and facilities. A strong, vibrant, attractive and thriving city centre is critical to attracting investment in Greater Norwich as the key driver of the area's economy and to supporting the delivery of housing and other development across the plan area.

273. As changes will inevitably continue, policy 7.1 takes a flexible long-term approach to continuing to promote a vibrant city centre in the context of the decline of high street shopping and the growth of online retailing. This flexible approach allows for:

- the expansion and diversification of city centre uses, with retail combining with other uses to foster an attractive and distinctive living and working environment;
- protecting and conserving built and natural heritage
- encouraging housing on all suitable city centre sites as part of mixed-use development;
- actively promoting and integrating new retail and other town centre uses in the city centre and resisting out of centre developments;
- attracting and retaining employment in the city centre and resisting loss of office floorspace;
- managing shopping frontages to effectively adapt to change and protect their vibrancy, diversity and attractiveness;
- mitigating the impact of traffic and improving accessibility and connectivity for pedestrians, cyclists and public transport.

274. The city centre has the potential to consolidate existing economic sectors as set out in policy 6 and detailed in this policy, such as finance, insurance and retailing, and support significant further growth in key economic sectors, including, ICT/digital culture industries, leisure and tourism. Evidence shows that the character of the city core and property typology are well suited to tech

firms and knowledge intensive businesses that function well within city locations that support face to face working.

275. The city centre also offers considerable potential for brownfield development to promote physical and economic regeneration in areas where there has been long-term decline.

276. The ongoing revitalisation of the King Street and Mountergate area has been a notable success, with more sites allocated in this area though this plan to secure further regeneration.

The Northern City Centre

277. Anglia Square, a 1960s neighbourhood shopping precinct, forming the main part of the large district centre in the north of the city centre, is also major regeneration priority. The capacity of Anglia Square to deliver a significant element of the plan’s housing need on a highly accessible brownfield site means that it has strategic significance for Greater Norwich. The Employment, Town Centre and Retail Study (GVA, 2017) acknowledges the considerable potential of Anglia Square to accommodate a much-enhanced retail and leisure offer including extensive public realm improvements.

278. The policy therefore promotes high density, housing-led mixed-use redevelopment of Anglia Square and surrounding vacant land. Redevelopment proposals should also include retailing, employment, community and leisure facilities.

279. Regeneration of Anglia Square is also intended to be the catalyst for substantial investment in, and further regeneration of, the wider northern city centre. As a result, the whole of the northern city centre area as defined in map 9 is identified on the Key Diagram as a Strategic regeneration area.

280. The northern city centre has been declared a neighbourhood area for planning purposes. This policy provides the strategic context for any more detailed plans for the area.

281. At the time of writing, Anglia Square is subject to comprehensive mixed-use regeneration proposals which Norwich City Council resolved to approve in December 2018. The Secretary of State has “called-in” the application for determination.

282. To provide strategy on the wide range of planning issues affecting the city centre, the remainder of the city centre element of the policy is divided into six sections on: the economy; retail and main town centre uses; leisure, culture, entertainment and the visitor economy; housing; the natural and built environment and access and transportation.

283. The policy seeks to attract and retain employment in the city centre by boosting employment sectors identified by evidence in the GVA study as having most growth potential, in particular knowledge based and digital creative industries, providing for a suitable range and choice of employment premises particularly in locations which are well related to transport hubs, offer good linkages with existing and expanding business networks and provide high value employment opportunities as part of the regeneration of key sites and areas. A key part of retaining employment in the city centre will be to reverse the significant loss of office employment. To this end the city centre policy provides the basis for the subsequent introduction of an Article 4 direction or directions to manage the loss of B1(a) office floorspace and ensure a supply of suitable sites and

premises for the of key city cent employment growth sectors, most particularly digital and creative industries.

284. Retail and other main town centre uses policy set out in policy 7.1 provides flexibility and recognises the trend for changing uses and functions in city centres. The aim is to ensure the centre provides an attractive location in which people can experience a complementary range of different uses, services and activities, including retailing. The Norwich City Centre Retail Strategy[94] prepared by the Norwich Business Improvement District endorses this approach. It acknowledges that a vibrant, diverse and accessible offer providing a range of different experiences for the visitor, alongside promotion of a strong and distinctive sense of place and identity, will be key to the long-term economic success of Norwich city centre.

285. Policy 6 places the city centre retail area at the top of the retail hierarchy, with the large district centres at Riverside and at Anglia Square, Magdalen Street and St. Augustines providing a complementary role and meeting more day to day needs. The extent of, and more detailed policies for, the city centre retail area, and the primary and secondary retail areas within it, along with the large district centres, are set out in existing development management policies.

286. The GVA study floorspace calculates that 11,000-15,000 square metres of additional comparison retail floorspace will be required in the Norwich urban area by 2027. However, in the light of potentially rapid further changes in comparison retailing it is premature to allocate any new retail sites. This will be revisited in the review of the plan when the future of retailing becomes clearer. The study forecasts no significant need for additional convenience retail floorspace by 2027.

287. In view of the rapidly changing retail picture and, based on recent trends, the possibility of further losses in retail representation, the reservation of a specific site for retail development is inappropriate. Any additional comparison retail floorspace will primarily be accommodated through the intensification of retail use on existing sites.

288. Development to support speciality, independent and small-scale retailing is encouraged by the policy. This allows for additional convenience goods floorspace to be provided for through smaller food store development to support new mixed-use development and regeneration.

289. The policy also prioritises vibrancy, activity and diversity of uses in defined retail areas, permitting the use of redundant floorspace for other uses, including the re-use of upper floors.

290. The policy supports the delivery of more high-quality housing on suitable sites, generally as part of mixed-use development, except where including housing in redevelopment could affect the commercial vitality and viability of the centre. It also supports the expansion of further and higher education facilities and promotes development to augment the supply of purpose-built accommodation for students in the city centre.

291. The policy encourages the development of new leisure and cultural facilities, hotels and other visitor accommodation to support the delivery of a broader range of activities in the city centre and strengthen Norwich City Centre's role as a visitor and cultural destination.

292. The changing role of late-night entertainment in the city centre is addressed through the policy accepting both evening and late-night uses throughout the centre subject to managing

[94] Norwich City Centre Future Retail Strategy, The Retail Group on behalf of Norwich BID, June 2019

impacts on adjoining occupiers and protecting residential amenity through controls on opening hours and imposition of conditions to limit potential noise and disturbance.

293. To supplement policy 3 for the built and natural environment, policy 7.1 promotes innovative design with reference to the City Centre Conservation Area Appraisal, particularly at gateways, and supports further delivery of the riverside walk and the River Wensum Strategy.

294. To support the above, development is required to assist in implementing accessibility, legibility and permeability measures within the city centre. These are likely to comprise improvements to the public transport, walking and cycling networks to enhance connectivity, including public realm works. This will be led by the Transport for Norwich strategy.

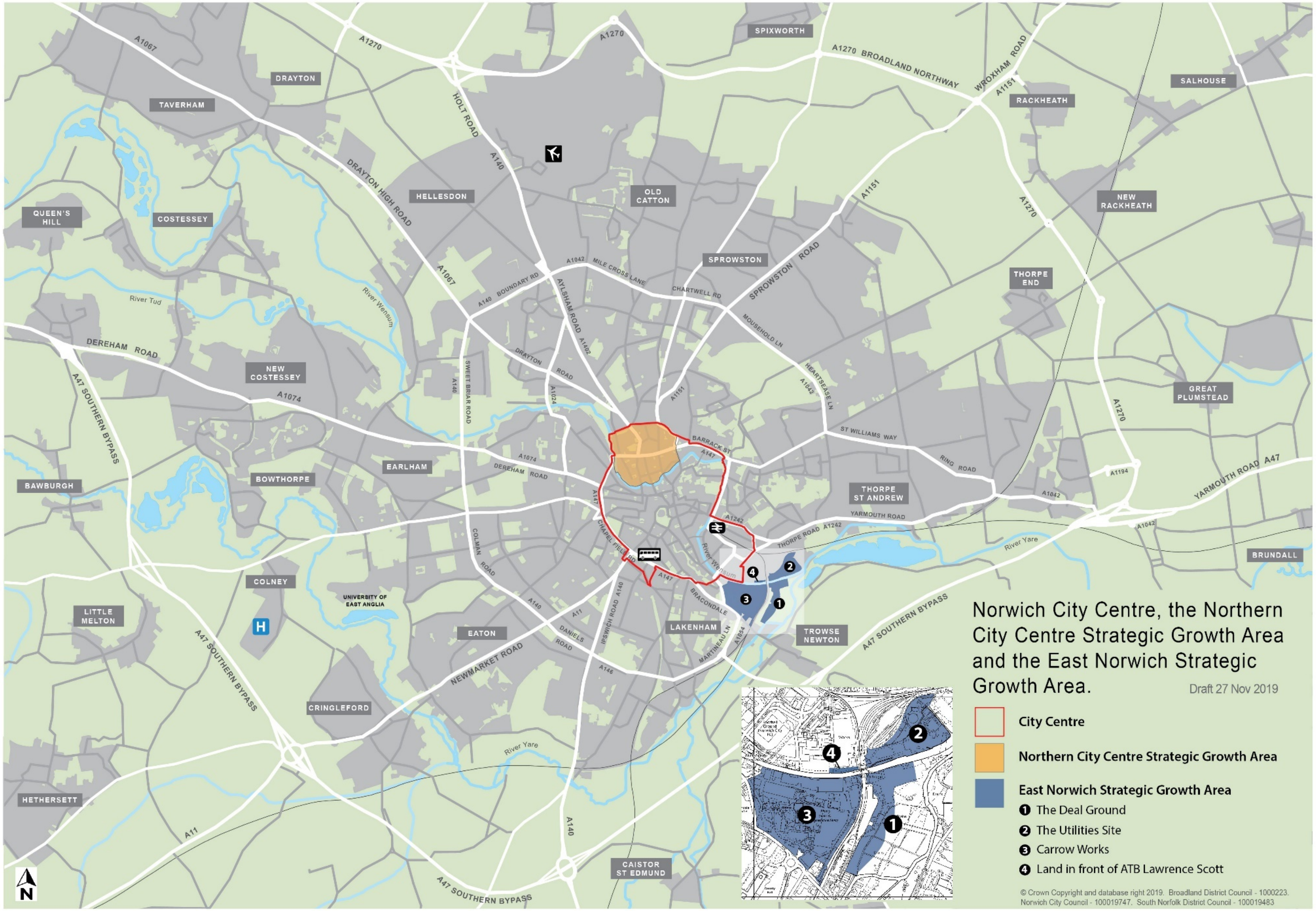
East Norwich

295. East Norwich, which consists of brownfield regeneration sites by the rivers Wensum and Yare at Carrow Works, the Deal Ground and the Utilities Site, and land in front of ATB Laurence Scott fronting the Wensum, linking to allocation CC16 (Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way), is defined on map 8 below. It has the potential in the long-term to create a new urban quarter for Norwich, to act as a catalyst for additional regeneration in neighbouring urban areas and to contribute significantly to growth of the Greater Norwich economy. As a result, it is identified as a strategic regeneration area on the Key Diagram.

296. To ensure growth is co-ordinated, overcomes local constraints and is well-designed in a sensitive location in and adjacent to the Broads Authority area, the policy requires regeneration to be guided by an area-wide masterplan supplementary planning document. The masterplan will promote development of a high density sustainable mixed-use community, co-ordinate delivery of new transport infrastructure and services, enhance green links, provide for a local energy network, enhance heritage assets and address local issues including the active railway, the protected minerals railhead and flood risk issues.

Note: There is currently uncertainty about the Britvic/Unilever Carrow Works site. As a result, policy in relation to this site could be amended in the Publication (Regulation 19) version of the plan.

Map 9 - Norwich City Centre, the Northern City Centre Strategic Growth Area and the East Norwich Growth Area



Elsewhere in the urban area, including the fringe parishes

297. Reflecting the settlement hierarchy set out in policy 1, development elsewhere in the urban area and in the fringe parishes within Broadland and South Norfolk areas will support sustainable housing and employment growth on sites with good access to services.

298. The area contains substantial communities located in residential areas with the benefits of being accessible to the services, facilities and employment that are located here and in the city centre. It also has the advantage of being located near to the countryside which adds to its attraction. This proximity makes the area attractive both as a place to live and for the location of employment.

299. The importance of this area to the strategy for Greater Norwich is illustrated by the fact that it will provide almost half of the housing growth and the majority of the strategic employment areas.

300. Housing growth in the area will consist of limited numbers of brownfield developments in existing built up areas, along with significant growth in both strategic and smaller scale extensions to the urban area.

301. As set out in policy 6, strategic employment growth will be in accessible locations at Norwich Research Park, Easton/Honingham, Longwater and the Growth Triangle. Growth at these employment locations will provide sites for both knowledge intensive industries, particularly on existing and newly allocated sites at Norwich Research Park, and for building a broad-based economy.

302. Further growth is planned at UEA through intensification of uses within the campus and its limited expansion. This is in line with evidence supporting growth as part of wider expansion of the education sector and of Norwich Research Park, both of which are key to economic growth in Greater Norwich.

303. In line with its adopted Area Action Plan, and with the addition of a site for over 1,200 new homes at White House Farm in Sprowston allocated through this plan, the Growth Triangle provides for almost 13,000 new homes to 2038, along with the growth strategic employment areas close to Norwich Airport, at Rackheth and in Thorpe St. Andrew.

304. Other strategic housing growth locations of over 1,000 homes will provide well located new communities in the west of the area. These consist of new and expanded communities in Cringleford, Easton and Hellesdon and the completion of the long-term urban extension at Three Score, Bowthorpe.

305. This and other policies in the development plan ensure that such growth will be positive, adding to the choices in terms of location and quality in the area in an appropriate manner. In particular, major development should be integrated with existing communities both physically, through connecting roads, footways, cycleways and green infrastructure, and socially for example through recreational provision on new developments or improvements to existing provision.

POLICY 7.1 – The Norwich Urban Area including the fringe parishes

Norwich and the fringe parishes[95] will be the area's major focus for jobs, homes and service development to enhance its regional centre role and to promote major regeneration, the growth of strategic and smaller scale extensions and redevelopment to support neighbourhood renewal. The area will provide 30,500 additional homes and sites for a significant increase in jobs, including around 257 hectares of undeveloped land allocated for employment use.

To achieve this, development sites will be focussed in the city centre, in strategic regeneration areas in East Norwich and the Northern City Centre and at strategic urban extensions[96] in the north-east and west as well as other locations across the urban area as follows:

Housing

Part of Norwich Urban area	Existing deliverable commitment (including uplift + delivery 2018/19)	New allocations	Total deliverable housing commitment 2018 - 2038
City centre			
Northern City Centre Strategic Regeneration Area	1,891	50	1,941
Other city centre sites	2,729	130	2,859
City centre total	**4,620**	**180**	**4,800**
East Norwich			
East Norwich Strategic Regeneration Area	**780**	**1,220**	**2,000**
Elsewhere in the urban area (* denotes strategic urban extensions)			
Colney	4	0	4
Costessey[97]	520	0	520
Cringleford*	1,721	0	1,721
Drayton	318	0	318
Easton*	1,045	0	1,045

[95] The Norwich fringe is the built-up parts of the fringe parishes of Colney, Costessey, Cringleford, Drayton, Easton, Hellesdon, Old Catton, Sprowston, Taverham, Thorpe St. Andrew, Trowse and the remainder of the Growth Triangle
[96] Strategic urban extensions/strategic housing growth locations will each provide over 1,000 new homes from 2018 to 2036
[97] A 1,000-home contingency site at Costessey will be brought forward if delivery of housing in the GNLP area does not meet local plan targets. It is not included in these figures.

Hellesdon*	1,330	0	1,330
Other sites in Norwich	2,143	180	2,323
Three Score, Bowthorpe*	900	0	900
Taverham*	114	1,400	1,514
The Growth Triangle*	12,019	1,415	13,434
Thorpe St. Andrew	354	0	354
Trowse	244	0	244
Other sites in urban area (Old Catton, Keswick, Sprowston)	53	0	53
Elsewhere in urban area total	**20,765**	**2,995**	**23,760**
Norwich Urban Area Total	**26,165**	**4,395**	**30,560**

Employment

Part of Norwich Urban Area	**Existing undeveloped employment allocations (hectares, April 2018)**	**New allocations (hectares)**	**Total undeveloped employment allocations (hectares)**
See policies 1 and 6 for the strategic sites in the Norwich Urban Area	187.9	46.9	**245.8**
Hellesdon	1.4	0	**1.4**
Taverham	5.6	0	**5.6**
Harford Bridge	4	0	**4**
Norwich urban area total	**198.9**	**46.9**	**256.8**

Other small-scale housing and employment development will be acceptable in principle elsewhere in the Norwich urban area subject to meeting other policies in the development plan.

The City Centre

Norwich city centre's strategic role as key driver for the Greater Norwich economy will be strengthened. Development in the city centre will provide a high density mix of employment, housing, leisure and other uses. Intensification of uses within the city centre to strengthen its role as a main regional employment, retail, cultural and visitor centre, providing a vibrant and diverse experience for all, will be supported.

Comprehensive redevelopment of the large district centre at Anglia Square and surrounding vacant land will provide a viable, high density, housing-led mixed-use development including retailing, employment, community and leisure facilities. The redevelopment of Anglia Square will be the catalyst for change in the wider Northern City Centre strategic regeneration area identified on the Key Diagram and defined in map 9.

1. Economy

To ensure a strong employment base, development should provide a range of floorspace, land and premises as part of mixed-use developments. Development should promote more intensive use of land to meet identified needs for start-up and grow-on space for small and medium sized enterprises including the digital creative industries, technology, financial and cultural and leisure services clusters. To support this, loss of existing office floorspace will be resisted.

Development of buildings for further and higher education, training and lifelong learning will be supported in the city centre. The development of purpose-built student accommodation will be accepted where it accords with the criteria in policy 5.

2. Retail and main town centre uses

The centre's retail function will be supported as part of a complementary range of uses. Provision for any additional comparison retail floorspace will primarily be met through the intensification of retail use on existing sites.

Proposals for new development and change of use in primary and secondary retail areas and large district centres (as defined in policy 6) will be accepted where they:

- **contribute to meeting identified needs for new retail floorspace and other main town centre uses, including speciality and independent shopping and small-scale retailing; or**
- **promote diversification of services and facilities to ensure that vitality and vibrancy can be maintained throughout the day and evening; or**
- **provide mixed-use development including housing, high quality employment, flexible working, education, leisure, culture and entertainment, where this supports and complements the function of the centre; or**
- **secure the beneficial redevelopment and adaptation of disused and underused land and premises including redundant retail floorspace.**

3. Leisure, culture and entertainment and the visitor economy

The city centre's leisure cultural and entertainment offer will be supported and expanded. Development of new leisure and cultural facilities, hotels and other visitor accommodation to strengthen the city centre's role as a visitor and cultural destination will be accepted in accessible locations well related to centres of activity and transport hubs. Leisure uses, including uses supporting the evening and late-night economy, will be accepted in all areas of the centre where noise and disturbance issues can be mitigated.

4. Housing

To maximise the potential of the city centre to deliver new homes, housing will be required on the specific allocated sites detailed in the Sites document.

5. The Natural and Built Environment

The protect and enhance the distinctive natural and built environment and heritage assets of the city centre:

- **New development proposals should address the principles set out in the City Centre Conservation Area Appraisal (or any successor), providing innovative and sustainable design;**
- **Riverside development should provide a riverside walk and assist in delivering the priorities of the River Wensum Strategy (or any successor);**
- **New landmark buildings at the gateways to the city centre will be accepted where they are of exceptional quality and help to define or emphasise the significance of the gateway.**

6. Access and Transportation

Development will be required to contribute to measures promoted by Transport for Norwich to improve accessibility, connectivity, legibility and permeability within the city centre.

East Norwich

Development of sites allocated in the East Norwich strategic regeneration area identified on the Key Diagram and defined on map 8 including Carrow Works, the Deal Ground and the Utilities Site will contribute to the comprehensive long-term development of an innovative, high density, sustainable, mixed-use gateway quarter. This will provide a minimum of 2,000 additional homes in the plan period. East Norwich also has the potential to act as a long-term catalyst for regeneration of the wider area, potentially including the following sites if they become available:

- **Redevelopment of land adjoining the railway between the Deal Ground and Carrow Works as part of the wider East Norwich strategic growth area masterplan supplementary planning document;**
- **Land east of Norwich City F.C.;**
- **Intensification of uses at Riverside and**
- **Regeneration in the Rouen Road area.**

Site proposals within the East Norwich strategic regeneration area will meet the requirements of an area-wide masterplan to ensure co-ordinated development. This will include:

- **creating a distinct, sustainable mixed-use community and new gateway quarter for the city, built at high densities, taking account of its setting adjacent to the Broads;**
- **the provision of area-wide infrastructure and services, including retained employment opportunities, a new local centre, and a new primary school should need be established;**
- **establishing an integrated access and transportation strategy which emphasises sustainable accessibility and traffic restraint, and allows for connectivity and permeability within and between the sites in the strategic regeneration area and beyond, including north-south links between Trowse and Bracondale and the north bank of the Wensum and Thorpe Road / Yarmouth Road, and east-west between the city centre and Whitlingham Country Park and the Broads including an extended riverside walk on the north and south banks of the Wensum. Proposals should be designed for ease of access to, and by, public transport, with appropriate bridge provision to ensure the sites are fully permeable by sustainable transport modes;**

- **planning development effectively to manage and mitigate the impact of vehicular traffic from the site/s on the local highway network including the Martineau Lane roundabout, Bracondale and King Street;**
- **protecting and enhancing green infrastructure assets, corridors and open spaces within the area, including enhancing linkages from the city centre to the Broads, the wider rural area and elsewhere in Norwich, to include pedestrian/cycle links between Whitlingham Country Park and the city centre;**
- **providing for sustainable energy generation, including a local energy network serving the area as a whole;**
- **protecting and enhancing heritage assets, Carrow Abbey, Carrow House, Trowse Pumping Station, Thorpe Hall and their settings, and the Bracondale , Thorpe Ridge, Trowse and Thorpe St Andrew Conservation Areas;**
- **achieving high quality, locally distinctive, energy efficient and flood resilient design which addresses identified risks from river and surface water flooding and mitigates against potential sources of noise and air pollution and establishes strong built frontages along the River Wensum and the defining network of streets and spaces with the sites;**
- **addressing and remediating site contamination; and**
- **planning to allow scope for greater use of the Rivers Wensum and Yare for water-based recreation, leisure and tourism including the potential inclusion of marinas and riverside moorings and access for waterborne freight subject to not impeding navigation of either river.**

<u>Elsewhere in the urban area including the fringe parishes</u>

The remainder of the urban area including the fringe parishes will provide for a significant proportion of the total growth in Greater Norwich. Development will provide a range of sites for different types of housing, employment and community uses that are accessible and integrate well with the existing communities. It will provide necessary infrastructure, with a focus on public transport, walking and cycling, as well as social and green infrastructure.

Growth will include:

- **Development of strategic and smaller scale urban extensions at existing locations committed for housing and employment uses as set out in the tables above (including that within the adopted Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Area Action Plan), with uplift on existing allocated sites in Cringleford, Easton and Three Score (Bowthorpe);**
- **Significant new development proposals (including the expansion of the Norwich Research Park, and a large new allocation for homes in the Growth Triangle in Sprowston);**
- **Development at the University of East Anglia to cater for up to 5,000 additional students by 2038 through intensification of uses within the campus and its limited expansion;**
- **Development sites in the Sites document which will support neighbourhood-based renewal on brownfield sites, with densities highest in the most accessible locations and**
- **Enhancements to the green infrastructure network which will include links to and within the Wensum, Yare, Tud and Tas Valleys, Marriott's Way and from Mousehold through the north-east growth triangle as set out in map 8, along with local networks.**

In addition, a large contingency site is identified in Costessey to be brought forward if delivery of housing in the GNLP area does not meet local plan targets.

Alternative approaches

The Norwich urban area policy covers a wide range of issues.

The policy for the **City centre** tries to promote and balance a wide range of potentially competing uses. Although all these uses need to be accommodated, there could be several alternative approaches or different emphases to achieve this.

The policy allows for **evening and late-night leisure uses** across the city centre. An alternative would be to retain the current approach of focussing such uses in specific areas of the city centre.

The policy identifies a large **contingency site** at Costessey. If clear evidence for delivery is submitted, an alternative approach would be to allocate the site (increasing the overall level of residential allocations in the plan).

Consultation Questions for Policy 7.1 – The Norwich Urban area including the fringe parishes

38. Do you support or object or wish to comment on the approach for the city centre? Please identify particular issues.
39. Do you support or object or wish to comment on the approach for East Norwich? Please identify particular issues.
40. Do you support or object or wish to comment on the approach for elsewhere in the urban area including the fringe parishes? Please identify particular issues.

Policy 7.2 The Main Towns

306. In line with the settlement hierarchy, the main towns of Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham collectively provide 6,342 homes, around 14% of the proposed housing growth planned to 2038.

307. The towns play a vital role in the rural economy, providing employment opportunities and services for wider hinterlands. As such, they are engines of rural growth and it is important that they are enabled to grow at appropriate scales, having regard to infrastructure and environmental issues, to enable them to thrive. Growth in these towns will have good access to services.

308. Some development is already identified for the towns through existing local plans. In particular, major development proposals are set out in the Long Stratton and Wymondham Area Action Plans (AAPs), which are not superseded by the GNLP and continue to operate.

309. Since allocations meet growth needs, in line with other policies in this plan, windfall sites will be limited to locations within and, for very small developments limited to 3 homes, adjacent to settlement boundaries.

310. Retail evidence[98] suggests that there will not be the need for major additional retail expansion in the main towns, with the possible exception of Diss. Since retailing is experiencing significant changes, no land allocations are made through the plan. This policy and policy 6 allow for such development, prioritising town centre locations, if new evidence justifies it.

Aylsham

311. Aylsham has a good range of shops and services in and around its attractive and historic centre and local employment opportunities. Transport links to and from the town via the A140 are good, including regular bus services to Norwich and North Norfolk. Delivery of housing has been good in recent years and just over 200 homes remain to be delivered from 2018 commitments.

312. The Bure Valley and the Marriott's Way form the core of a well-developed local and strategic green infrastructure network and development could support further improvements.

313. To support the continued vitality of Aylsham and to locate an appropriate amount of growth in this main town, 300 additional homes are allocated on a site to the south-east of the town centre through the GNLP. The site has good access to the A140 and public transport. A new primary school required to serve growth in the town is included in the allocation. Anglian Water plans to increase capacity at the local water recycling centres at Aylsham and Belaugh to serve growth.

Diss (with part of Roydon adjacent to Diss)

314. Diss is strategically located on the Norwich to London railway line and the A140 and A143 provide road links to Norwich, Ipswich, east coast ports and Bury St. Edmunds. Diss is also a hub for local bus links.

315. Diss has the widest range of shops and services of the main towns, as well as a broad range of employment opportunities mainly located to the east of the town centre close to the railway. The shops and services are mainly within the attractive town centre of Diss, which has significant

[98] Greater Norwich Employment, Town Centre and Retail Study (The GVA Study)

pedestrian priority areas, along with supermarkets on Victoria Road. Diss Mere and its surrounding green space provide a distinctive focal point for the town centre.

316. These locational attributes and connectivity provide the potential for economic growth as an enhanced centre serving a large rural hinterland in South Norfolk and northern Suffolk.

317. Diss and Roydon are in the Waveney Valley. The valley provides an attractive setting for the settlements and is the hub of an extensive green infrastructure network including the Angles and Boudicca Ways.

318. While delivery of housing has been good in recent years, associated environmental constraints place limits on the potential for housing expansion. Local evidence[99] shows that traffic constraints, particularly on Victoria Road, also reduce the potential for significant additional expansion.

319. The existing commitment of just over 300 dwellings in April 2018 is complemented by a brownfield site neighbouring the railway station, which offers the potential for medium to high density development, along with a greenfield allocation to the north of the town. The latter provides for a short link road between radial routes. Together, these sites provide 400 additional homes, so a total increase of just over 700 homes is planned to 2038.

320. Evidence[100] suggests that Diss has the best potential of the main towns for retail growth, which could be accompanied by further improvements to the public realm and a strengthened food and beverage offer in the town centre.

321. The GVA Study also shows that Diss has the potential for jobs growth on existing undeveloped allocated employment land, particularly for manufacturing, including high value activities. The sites are close to the railway line and have good access to a large neighbouring employment area at Eye Airfield, allowing for complementary activities.

Harleston

322. Harleston has a smaller range of more specialist retail facilities and services which provide for a more local catchment in South Norfolk and northern Suffolk. These have the potential for expansion. It has good road links to the east and west via the A143 and access to Norwich via the A140 will be improved by delivery of the Long Stratton by-pass. A local bus network is focussed on the town.

323. Harleston is close to the River Waveney and the Angles Way along the valley forms part of the strategic green infrastructure network.

324. Housing delivery has been good in Harleston in recent years. The plan allocates two sites to the south-east of the town centre within the A143 by-pass and close to employment areas. The sites provide for 450 new homes and significant areas of open space in addition to the April 2018 commitment of around 170 dwellings. Growth of just over 600 new homes in Harleston to 2038 will support the retention and expansion of services and jobs in this attractive market town.

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[99] In the emerging Diss Market Town Network Improvement Strategy (NIS)
[100] Greater Norwich Employment, Town Centre and Retail Study (The GVA Study)

Long Stratton

325. Due to the scale of the existing commitment in Long Stratton, which will both provide a by-pass and the growth of services supporting its classification as a main town, this plan does not make further allocations in addition to Long Stratton's Area Action Plan (AAP). Evidence[101] shows that the scale of the commitment means that parts of the site allocated in the AAP will not be delivered until after 2038. There may be further potential capacity for development within the existing allocation, beyond the 1,875 homes that are the subject of current planning applications; however, these would be unlikely to be delivered until late in the plan period, or beyond.

326. The AAP identifies some infrastructure capacity constraints, particularly in relation to Long Stratton Water Recycling Centre, although Anglian Water plans to increase capacity to serve growth. The GNLP is not intended to replace the AAP, which may therefore be reviewed separately later to address the delivery of additional housing in Long Stratton, if required.

Wymondham

327. The plan allocates two sites in Wymondham for a total of 100 additional dwellings to 2038. With the major housing commitment and employment expansion set out in Wymondham's Area Action Plan, this means that the town will grow by around 2,600 homes, along with strategic employment growth at Browick Road. This will both support Wymondham's role as a main town serving the south-west of Greater Norwich and contribute to the development of the Cambridge Norwich Tech Corridor.

328. Due to its strategic location, the settlement of Wymondham is also identified for a contingency of 1,000 additional dwellings to be brought forward if delivery of housing in the GNLP area does not meet local plan targets.

Note: At this Regulation 18 stage, no specific site in Wymondham has been identified to provide this contingency housing allowance.

329. Anglian Water plans to increase capacity at the local water recycling centre at Wymondham to serve growth.

330. The strategic gaps identified through this plan and other policies in the development plan aim to prevent coalescence of Wymondham and Hethersett.

[101] Analysis of Commitments

POLICY 7.2 – THE MAIN TOWNS

The Main Towns of Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham will continue to be developed to enhance their function as attractive places to live and providers of employment and services to serve the towns and their hinterlands, with substantial levels of development expected to take place. This will provide for around 6,300 additional homes and sites for employment and commercial land and related infrastructure.

The identified levels of development, including growth committed in the Long Stratton and Wymondham Area Action Plans, are:

Housing

Main Town	Existing deliverable commitment (including uplift + delivery 2018/19)	New allocations	Total deliverable housing commitment 2018 - 2038
Aylsham	221	300	521
Diss (with part of Roydon)	343	400	743
Harleston	173	450	623
Long Stratton	1,892	0	1,892
Wymondham[102]	2,463	100	2,563
Total	5,092	1,250	6,342

Other residential development will be acceptable elsewhere within settlement boundaries subject to meeting the criteria of other policies in the development plan.

Employment

Main Town	Existing undeveloped employment allocations (hectares, April 2018)	New employment allocations (hectares)	Total employment allocations (hectares)
See polices 1 and 6 for the strategic site in Wymondham	22	0	22
Aylsham	4	0	4
Diss (with part of Roydon)	10.8	0	10.8
Harleston	6.8	0	6.8

[102] The settlement of Wymondham is also identified as a contingency for 1,000 additional dwellings to be brought forward if delivery of housing in the GNLP area does not meet local plan targets. At this Regulation 18 stage, no specific site has been identified to provide this contingency housing allowance.

Long Stratton	**12.5**	**0**	**12.5**
Wymondham	**2.1**	**0**	**2.1**
Total	**58.2**	**0**	**58.2**

Other small-scale employment development will be acceptable in principle elsewhere in the towns subject to meeting other policies in the development plan.

Retail and other town centre type uses should be located in or adjoining the town centres. Proposals which support speciality and independent shopping, small-scale retailing and diversification of services and facilities will be encouraged.

Enhancements to the multi-functional green infrastructure network will be provided by development to contribute to the strategic network as set out in map 8 and to linking local networks.

Alternative approaches

The main towns of Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham are drivers of the rural economy and it is important they can grow at appropriate scales. The plan identifies sites for approximately 14% of new housing in main towns.

Much of the proposed development has planning permission. The approach being taken recognises the already significant commitments in main towns, especially in Long Stratton and Wymondham. More capacity for new allocations is available in Aylsham, Diss (with part of Roydon), Harleston and Wymondham.

The 14% proportion of new housing could be increased as a large number of reasonable alternative sites have been proposed in the main towns.

However, overall the preferred option is considered to provide a suitable amount of growth in relation to the settlement hierarchy, infrastructure and local constraints.

The Sites document sets out the preferred option and reasonable alternative sites.

Consultation Questions for Policy 7.2 – The Main Towns

41. Do you support or object or wish to comment on the approach for the main towns overall? Please identify particular issues.
42. Do you support or object or wish to comment on the approach for specific towns (Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham)? Please identify particular issues.

Policy 7.3 The Key Service Centres

331. The Key Service Centres of Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framingham Earl, Reepham and Wroxham provide 3,417 homes, around 8% of the proposed housing growth. This reflects the settlement hierarchy and is made up of significant existing commitments, with additional sites allocated through this plan in the locations with the best opportunities for further growth and the fewest constraints.

332. The Key Service Centres have a relatively good range of services, access to public transport and employment opportunities and play a vital role in serving the rural areas. This role is intended to continue with development taking place at appropriate levels.

333. High amounts of existing commitments and environmental and infrastructure constraints limit the potential for additional housing growth through this plan at Blofield, Brundall, Poringland / Framingham Earl and Reepham. Traffic constraints and proximity to the Broads at Wroxham restrict growth.

334. The focus of additional housing growth identified through this plan is therefore at Acle, Hethersett, Hingham and Loddon / Chedgrave.

335. Acle has been identified for additional growth on well-located sites which could provide a link road to the west of the village. The village has a good range of services including a secondary school. It also has good bus and rail services and is strategically located between Norwich and Great Yarmouth to benefit from employment growth, including in the offshore energy sector.

336. Hethersett is close to Norwich and within the Cambridge Norwich Tech Corridor. It has a range of services including a secondary school and good access to other services, with good public transport links to Norwich and Wymondham. It also has good access to employment opportunities at a range of strategic and more local sites. As a result, major development is committed to the north and west of the village and additional growth identified through this plan will be delivered through uplift within the existing allocation. Strategic gaps identified through this plan and detailed in development management policies between Wymondham and Hethersett and Hethersett and Cringleford aim to prevent the settlements joining up.

337. Hingham has limited existing commitment, a range of services and employment, good public transport links and is well located to benefit from additional employment opportunities in the Cambridge Norwich Tech Corridor. The two additional allocations to the east and west of the village, which provide for 100 homes, both have good access to services and public transport.

338. Loddon / Chedgrave has a good range of services, good public transport links and is well located between Norwich and Lowestoft to benefit from employment growth, including in the offshore energy sector. Additional growth is allocated on a small site to the north of Chedgrave and a larger site to the south-east of Loddon.

339. In line with other policies in this plan, windfall sites will be limited to locations within and, for very small developments limited to 3 homes, adjacent to settlement boundaries.

POLICY 7.3 – THE KEY SERVICE CENTRES

The Key Service Centres of Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framingham Earl, Reepham and Wroxham will continue to be developed to enhance their function as places to live and providers of employment and services to serve the settlement and its hinterland, with significant levels of development expected to take place in the majority of centres. This will provide for a minimum of 3,253 additional homes and sites for 11.79 hectares of employment / commercial land and related infrastructure.

The main areas for development are:

Housing

Key Service Centre	Existing deliverable commitment (including uplift + delivery 2018/19)	New allocations	Total deliverable housing commitment 2018 - 2038
Acle	191	200	391
Blofield	338	15	353
Brundall	175	0	175
Hethersett	1,369	0	1,369
Hingham	16	100	116
Loddon / Chedgrave	200	200	400
Poringland / Framingham Earl	467	0	467
Reepham	142	0	142
Wroxham	4	0	4
Total	2,902	515	3,417

The sites to meet the above targets are in the GNLP Sites document.

Other residential development will be acceptable elsewhere within settlement boundaries subject to meeting the criteria of other policies in the development plan.

Employment

Key Service Centre	Existing undeveloped employment allocations (hectares, April 2018)	New allocations (hectares)	Total employment allocations (hectares)
Acle	0.7	0	0.7
Hingham	2.2	0	2.2
Loddon / Chedgrave	1.8	0	1.8

Poringland / Framingham Earl	**4.3**	**0**	**4.3**
Reepham	**2.8**	**0**	**2.8**
Total	**11.8**	**0**	**11.8**

Other small-scale employment development will be acceptable in principle elsewhere in the key service centres subject to meeting other policies in the development plan.

Enhancements to the multi-functional green infrastructure network will be provided by development to contribute to the strategic network as set out in map 8 and to linking local networks.

Alternative approaches

This plan proposes allocations for sites for approximately 8% of new housing in key service centres. Much of that is in existing commitments 2,902 homes, with new allocations totalling 515 homes proposed. This approach recognises that while some key service centres have large existing commitments, along with environment and infrastructure constraints, capacity for new development exists in several key service centres.

The 8% proportion of new housing in key service centres could be increased as many reasonable alternative sites have been proposed in key service centres. However, overall the preferred option is considered to provide a suitable amount of growth in relation to the settlement hierarchy, infrastructure and local constraints. **The Sites document sets out the preferred option and reasonable alternative sites.**

Consultation Questions for Policy 7.3 – The Key Service Centres

43. Do you support or object or wish to comment on the approach for the key service centres overall? Please identify particular issues.
44. Do you support or object or wish to comment on the approach for specific key service centres: (Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framingham Earl, Reepham, Wroxham)? Please identify particular issues.

Policy 7.4 Village clusters

340. The remaining permitted and allocated housing growth, 4,024 homes, around 9% of the total for Greater Norwich in the plan period, is on sites in village clusters. Village clusters are based on primary school catchments, which provide a proxy for social sustainability.

341. Locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services. The provision of several relatively small allocation sites as required by the National Planning Policy Framework means this approach also has the benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations. The policy also aims to provide a range of sizes and tenures of new homes to meet needs in village clusters.

342. A separate South Norfolk Village Clusters Housing Site Allocations document will be produced. This plan will include sites for a minimum of 1,200 homes in addition to the 1,349 already committed in the village clusters to be identified in South Norfolk.

343. The village clusters in Broadland and the indicative amount of growth planned for each cluster are set out in appendix 5 of this strategy. The GNLP Sites plan allocates sites to meet the strategic requirement for up to 480 more homes in addition to the 995 homes already committed in the village clusters in Broadland.

344. The village clusters cover the remaining areas of Broadland outside the Norwich fringe, main towns and key service centres. Some smaller settlements are clustered with towns and villages higher in the settlement hierarchy, such as the villages around Aylsham. This applies where the larger settlement provides the local primary school.

345. The scale of growth in any cluster in Broadland as shown appendix 5 reflects school capacity or ability to grow and the availability of other accessible services, the “social capacity” of a cluster. The identification of sites with the fewest constraints has also helped to provide the indicative view on the potential amount of growth in specific clusters.

346. To reduce additional car journeys and encourage healthy and active lifestyles, new housing allocations have been preferred on sites within village clusters with good access to a primary school and a safe route to school.

347. Policies 1 and 7.4 also support windfall development for affordable housing in the village clusters in both Broadland and South Norfolk, with some market housing permitted where it supports viability, including self/custom-build. The policies allow for infill and small extensions in those parts of village clusters which have a settlement boundary.

348. This approach will provide for appropriate levels of growth in accessible locations in village clusters as required by policy 1.

POLICY 7.4 – VILLAGE CLUSTERS

Housing

To provide a minimum of 4,024 homes as set out in policy 1 and to support village services, provide choice for the market and promote delivery of a variety of housing types and tenures, housing development will be supported in principle on a range of sites within the village clusters.

To achieve this:

1. **New sites in village clusters to provide a minimum of 1,200 homes will be allocated through a South Norfolk village clusters plan;**
2. **New sites in village clusters in Broadland to provide up to 480 homes are allocated in the Greater Norwich Local Plan Sites Plan.**

Note: New sites submitted through this consultation will be considered for allocation in this plan or in the South Norfolk Village Clusters Housing Site Allocations document. Sites of between half a hectare and 1 hectare are particularly welcomed (see questions below).

Additional sites may be provided in village clusters by:

1. **Infill development within settlement boundaries;**

2. **Affordable housing led development, which may include an element of market housing (including self/custom build) if necessary, for viability, up to a maximum of 15 dwellings in total. These sites should be adjacent or well related to settlement boundaries with good access to services, including safe routes to schools, subject to other policies of the local plan.**

The cumulative amount of windfall development permitted during the plan period should not have a negative impact on the character and scale of settlements in any village cluster in Broadland.

Employment

The allocated Employment Areas are:

Location	Existing undeveloped employment allocations (hectares, April 2018)	New allocations (hectares)	Total employment allocations (hectares)
See policies 1 and 6 for the strategic site at Hethel	20	0.8	20.8
Brooke	4.8	0	4.8
Foulsham	1.1	0	1.1
Lenwade	2.4	0	2.4
Lingwood	2.3	0	2.3
Total	30.6	0.8	31.4

Other small-scale employment development will be acceptable in principle elsewhere within village development boundaries or through the re-use of rural buildings subject to meeting other policies in the development plan.

Enhancements to the multi-functional green infrastructure network provided by development will contribute to the strategic network as set out in map 8 and to linking local networks.

Alternative approaches

In total, the proposed allocations coupled with the existing commitment provides sites for approximately 9% of new housing to be in village clusters across Greater Norwich. In addition, Policy 7.4 also allows for affordable housing-led windfall development in Broadland. Policy 7.5 allows for additional small-scale windfall development in all parishes across Greater Norwich.

Overall, the proposed approach is considered to provide a suitable amount of growth taking account of the settlement hierarchy and local constraints. It achieves the aim of providing a suitable level of growth in village clusters to help rural communities thrive while taking account of basic planning criteria and issues such as the capacity in the local school and promoting active lifestyles through safe routes to school.

Alternative approaches might seek more or less development or a different distribution within the villages. However, the scope for more growth or a different distribution is limited without breaching normal planning criteria and the sustainable site selection process. The majority of acceptable sites have been allocated and all the sites that have been identified as reasonable alternatives are in those clusters with preferred options. The alternative of a significantly lower level of growth would undermine the contribution that development can make to the social sustainability of village clusters.

Consultation Questions for Policy 7.4 – The Village Clusters

45. Do you support or object or wish to comment on the overall approach for the village clusters? Please identify particular issues.
46. Do you support or object or wish to comment on the approach for specific village clusters? Please identify particular issues.

Please submit any additional sites in village clusters in either Broadland or South Norfolk which you feel are suitable for allocation. We are particularly looking for sites of less than 1 hectare which could provide a minimum of 12 homes.

Policy 7.5 Small Scale Windfall Housing Development

349. This policy applies to all parishes. 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 policies other policies in this plan. The policy limits the number of homes on small scale windfall sites to three to prevent over development in rural areas. Policy 7.5 promotes small scale housing development, including self/custom build. This complements policies 5 and 7.4 which also support self/custom build.

350. To achieve this, the policy provides limited additional opportunities for the development of homes:

a. adjacent to settlements with development boundaries
b. or on infill sites within a recognisable group of dwellings which do not have a development boundary.

The policy also requires such developments to respect character of the settlement and landscape.

351. Additional requirements applying to all sites such as providing safe highways access set in policy 2 will be applied to these sites, though with greater flexibility in relation to access to services due to the very limited scale of development supported by the policy.

POLICY 7.5 – SMALL SCALE WINDFALL HOUSING DEVELOPMENT

Development of up to a maximum total of 3 dwellings within each parish during the lifetime of the plan will, in principle, be permitted on sites adjacent to a development boundary or on infill sites within a recognisable group of dwellings. Self/custom build will be supported. Proposals will respect the form and character of the settlement and have no detrimental impact on the landscape and natural environment.

Alternative approaches

The aim of policy 7.5 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 plan policies. **An alternative** could be to allow more growth on such sites, perhaps up to 5 homes, but the policy allows for sufficient additional growth to support the plan's aim to support thriving rural communities and offers opportunities for local housing need to be met.

Consultation Questions for Policy 7.5 – Small Scale Windfall Housing Development

47. Do you support or object or wish to comment on the overall approach for Small Scale Windfall Housing Development? Please identify particular issues.

Overarching Consultation Question

48. Do you support or object or wish to comment any other aspect of the draft plan not covered in other questions? This includes the appendices below. Please identify particular issues.

Appendix 1 Infrastructure requirements

This appendix provides additional detail to support policy 4 of this plan. It sets out infrastructure requirements to serve growth as identified in the Greater Norwich Local Plan Infrastructure Needs Report (GNLPINR). The GNLPINR and this appendix will be updated to inform the Publication (Regulation 19) version of the Greater Norwich Local Plan.

The infrastructure will be provided by a variety of organisations and funding sources. The requirements have been identified through ongoing and completed topic and organisation-based studies and strategies which inform both the GNLPINR and this plan.

Pedestrian and Cycling

Awaiting the findings of the Local Cycling and Walking Infrastructure plan (LCWIP), which is currently being developed.

Rail

Awaiting findings of the Norfolk Rail Prospectus, which is currently being reviewed.

Road

In addition to the schemes Highways England have committed to, further trunk road junction improvements may be required for future growth. The A47 Longwater Interchange and the following junctions will require further investigation:

- A47/A140 Ipswich Road
- A47/A146 Loddon Road
- Spinks Lane, Wymondham
- New Road, Acle

Water

Anglian Water's Water Recycling Long Term Plan plans for growth to 2045 through increased capacity at the following water recycling centres:
Acle; Aylsham; Belaugh; Long Stratton; Rackheath Springs – Wroxham; Sisland; Woodton; Whitlingham and Wymondham.

Energy

Substations requiring upgrades and/or the use of measures to off-set the need for reinforment (such as demand side responses and energy storage (batteries):

Substation (132/33kV)	Affected development sites
Sprowston Primary	Beeston Park Home Farm Sprowston Land off Salhouse Road Land south of Green Lane East Land south of Green Lane West Land south of Salhouse Road Rackheath White House Farm
Peachman Way Primary	Broadland Gate Brook Farm Land east of Broadland Business Park Land north of Broadland Business Park

Earlham Grid Local A/B	Costessey GN Food Enterprise Park Longwater / Easton Norwich Research Park Three Score
Cringleford Primary	Cringleford Hethersett

Broadband

A guide to Broadband for Norfolk Local Planning Authorities produced for the Norfolk Strategic Planning Framework sets out that superfast broadband coverage is rapidly improving, 92% of Norfolk's homes and businesses can now access superfast broadband, up from 42% in 2012 and initiatives, led by the County Council aim to make high-speed broadband available to more than 95% of Norfolk's premises by spring 2020. The report recommends that all residential developments over 10 dwellings and all employment developments will enable Fibre to the Premises (FTTP).

For schemes under these thresholds the Council's expectation is that provision for FTTP will be achieved, where practical.

Education

Norfolk County Council have six schools (three primary, one free school and two primary relocation and expansion) either in the process of being built or plans are in place for building over the next 2-3 years.

Other new schools are planned across the Greater Norwich area once housing and pupil numbers suggest that existing schools in the area are no longer able to accommodate local children. These currently include 10 new primary schools and one secondary school:

- Wymondham Silfield – 420 place primary school.
- Poringland – new school in response to considerable housing in the area – site search investigation being commissioned.
- Salhouse Road, Sprowston – site safeguarded for new 420 place school within new housing development.
- Hellesdon – new 420 place primary school within new development on former golf Club grounds.
- Beeston Park, North Norwich – sites for 2 x 420 place schools within proposed new housing development.
- Beeston Park – new secondary school in response to proposed housing.
- Rackheath – 2 x 420 new primary phase schools.
- Land north and south of Smee Lane, Norwich – planned new 420 place primary school in response to growth.
- Long Stratton – new 420 place primary school building in response to strategic growth in the village.

There will be additional new schools and school expansions to provide for the new allocations made through this plan. For larger sites, these have been considered as part of site allocations e.g. the preferred option site for 1,400 homes at Taverham includes a primary school site.

Health Care Requirements

Type of need	Existing Services	Additional need resulting from growth
Primary Care	GPs (currently 68 surgeries, 43 of which are main surgeries and 25 branch surgeries), community pharmacists and optometrists.	There are currently 2 options to increase capacity as required around the north and north-west of Norwich: 1. New build at Broadland Hub within or close to planned development at Beeston Park. 2. No new build, increased numbers spread amongst existing practices. The selected option will be confirmed in the annual review in 2020.
Hospital	There is one acute hospital, the Norfolk and Norwich University Hospital NHS Foundation Trust (NNUH). Other services are delivered from several other locations.	The NHS Long Term Plan and the STP Delivery Plan will address building capacity and facilities (including new rooms, theatres and beds, estimated cost c. £36 million) and parking issues.
Mental Health	Norfolk and Suffolk NHS Foundation Trust (NSFT) provides a broad range of services across Greater Norwich, with Hellesdon Hospital and the Julian Hospital in Norwich the largest sites.	In line with the shift to care in the community, the mental health trust is expected to shift services to wrap around primary care networks. Existing clinical and administrative provision at Hellesdon is not fit for purpose. This area of the site is going through a disposal process for housing. The NSFT's remaining accommodation in Norwich has constraints, including parking at the Julian Hospital. There is no spare capacity in primary care for mental health services in Diss and this may need to be reviewed. The above is included in the NSFT estates strategy review to be addressed as by the GNLP as and when appropriate.
Community Services	These are provided by Norfolk Community Health and Care NHS Trust at community hospital sites and health centres and include: • Inpatient specialist rehabilitation services; • Clinic services for outpatients; • Community nursing in patients' homes.	Clinical rooms are required at: Norwich Community Hospital; NNUH; Thorpe and Wymondham Health Centres (estimated total cost c. £200,000).

Police

Awaiting findings of the infrastructure work Norfolk Constabulary have commissioned NPS to produce.

Libraries

The Greater Norwich housing growth locations show an impact to the north east of the Norwich city boundary centred around Rackheath with an estimate of some 13,000+ dwellings. This has previously been identified as an area that will require additional library facilities due to the scale and size of the development. Therefore, based on an anticipated growth of 13,000 dwellings and an increased population of c26,000 people this would equate to 780 square metres of library space. We would anticipate, however, that this is over provision bearing in mind the location of other facilities in the locality and we suggest this is reduced to 390 square metres with an anticipated building cost of c £1millon.

Sports and Leisure

Awaiting findings of the Greater Norwich Sports Facilities Strategy, which is currently being reviewed.

Waste Management

Norfolk County Council has approved a capital programme for recycling centre improvements, including:

- Replacing the current Mile Cross Recycling Centre and relocating the site at Ketteringham to South Norwich;
- Replacing the Wymondham recycling centre and expanding the site at Morningthorpe;
- Extending the Strumpshaw Recycling Centre.

The capacity of new and extended sites will be designed to accommodate forecast growth. Funding for recycling centre improvements has been allocated by the County Council for the replacement sites for Mile Cross, Ketteringham and Wymondham and the extension of Strumpshaw and Morningthorpe. If required, contributions may be sought to deal with the cumulative impact of a series of both small and large developments.

Appendix 2 Glossary

Accessible

In the case of community facilities and services (such as healthcare), easy to travel to or use. With reference to buildings or public transport, easy to enter and use by all.

Active travel

Making journeys by physically active means, like walking or cycling. Active travel is promoted by Public Health England and by the National Planning Policy Framework through its focus on design which promotes health and well-being (paragraph 127 e)).

Affordable housing

Housing provided for sale or rent at prices below the current market rate, which people in housing need can afford. Affordable housing tenures are defined in government guidance, as set out in Annex 2 of the National Planning Policy Framework.

Air Quality Management Area (AQMA)

A place where the National Air Quality Objectives are not being met. Once an AQMA has been declared the authority has to carry out further work to monitor the air quality in the area and identify what actions can be taken to improve it.

Allocated

Land which has been identified for a specific use in the current development plan.

Appropriate Assessment

Analysis of the impact of plans and strategies on areas of designated European environmental importance such as Special Protection Areas, Special Areas of Conservation and Ramsar sites.

Area Action Plan (AAP)

A development plan document within the local plan that establishes a set of development proposals and policies for a specific area. In Greater Norwich there are current adopted area actions plans for the North East Growth Triangle, Long Stratton, and Wymondham.

Biodiversity

The variety of different types of plant and animal life in a region.

Biodiversity net gain

Refers to development having a positive impact on biodiversity, leaving it in a better state than before development occurred.

Brownfield land, brownfield site

Land or site that has been subject to previous development.

Brownfield Register

Brownfield land registers provide up-to-date information about sites that local authorities consider to be appropriate for residential development having regard to the relevant legislation.

Building for Life 12

A government-endorsed industry standard for well-designed homes and neighbourhoods. Local communities, local authorities and developers are encouraged to use it to guide discussions about creating good places to live. The National Planning Policy Framework encourages its use in local plans.

Built environment

The man-made surroundings that provide the setting for human activity, ranging in scale from personal shelter to neighbourhoods to large-scale civic surroundings.

Business use

Land use class covering light industry, offices, research and development.

Cambridge Norwich Tech Corridor

A public-private partnership spanning Norfolk, Suffolk and Cambridgeshire set up to deliver high-value economic and societal growth in clusters between Cambridge and Norwich within the technology/science sector.

City centre

The main commercial area of Norwich that is predominantly within the Inner Ring Road (A147). The exact boundary is shown on map 9 of the local plan.

Climate Change Mitigation

Actions taken to limit the magnitude or rate of global warming and its associated effects, usually involving a reduction in human emissions of greenhouse gases.

Commitments

Development proposals which already have planning permission or are allocated in adopted development plans.

Community facilities

Services that meet the day-to-day needs of a community such as village halls, post offices, doctors' and dentists' surgeries, play areas, recycling facilities, libraries and places of worship.

Community Infrastructure Levy (CIL)

A financial charge on new development introduced by the Planning Act 2008 as a tool for local authorities to help deliver infrastructure to support growth and development in their area.

Conservation area

Area of special historic and/or architectural interest which is designated by the local planning authority as being important to conserve and enhance. Special planning controls apply within these areas.

Core Bus Routes

A network of main bus routes where service frequency and bus priority will be enhanced.

County Wildlife Site (CWS)

Wildlife habitat identified and designated as being of local interest or importance by Norfolk County Council and the Norfolk Wildlife Trust, but which is not of enough national merit to be declared as a Site of Special Scientific Interest. A CWS does not benefit from statutory protection but does have some protection in the planning system.

Custom-build housing (see also self-build housing)

A form of self-build home that is, in some form, supported by a developer through a more hands-off approach than traditional self-build would entail.

Decentralised and renewable or low-carbon energy sources

Sources of energy that are renewable or low-carbon (or a combination of these) and locally based (on-site or near-site, but not remote off-site), usually on a relatively small scale. Decentralised energy is a broad term used to denote a diverse range of technologies, including micro-renewables, which can locally serve an individual building, development or wider community and includes heating and cooling energy.

Development

Defined in planning law as 'the carrying out of building, engineering, mining or other operations in, on, over, or under land, or the making of a material change of use of any building or land'.

Development Plan

A set of plans guiding future development in the area. The development plan consists of the locally prepared development plan documents, including Neighbourhood Plans approved at referendum.

Development Plan Document

Locally prepared document on a specific topic which forms part of the development plan and which subject to independent examination before adoption, also commonly referred to as DPDs.

District centre

A group of shops separate from the town centre containing at least one supermarket or superstore as well as other services. District centres provide for a catchment extending beyond the immediate locality.

Economic Strategy for Norfolk and Suffolk (ESNS)

A shared strategy between businesses, education providers, local councils and voluntary and community sector, which is led by New Anglia LEP outlining future growth across the region.

Employment use

Use primarily for industrial, warehousing, office or other business uses falling within classes B1, B2 and B8 of the use classes order.

Five-year housing land supply

A requirement by Government for local planning authorities to ensure that there is enough land available that is suitable, available and deliverable for housing development. The amount of land available should be enough to fulfil the housing requirement for the next five years.

Food Enterprise Park

46 acres of commercial development land with planning available for food related businesses near Easton and Honingham. A Local Development Order (LDO) is in place for part of the site.

Geodiversity

The variety of different types of geology, landforms, soils and physical processes in a region.

Greater Norwich City Deal

An agreement between government and Greater Norwich, which provides the city and surrounding areas certain powers and freedoms to take responsibility for decisions that affect Greater Norwich. It is implemented by the Greater Norwich Growth Board (GNGB).

Greater Norwich Growth Board (GNGB)

A partnership between Broadland District Council, Norwich City Council, South Norfolk Council, Norfolk County Council and New Anglia Local Enterprise Partnership (LEP) to provide homes, jobs and infrastructure. It also provides strategic direction, monitoring and co-ordination of the Greater Norwich City Deal.

Greater Norwich Local Plan Infrastructure Report (GNLPIR)

A supporting document to the GNLP focusing on transport, utilities, education, health care, fire and rescue, community facilities, sport and leisure facilities, green infrastructure and waste management.

Green infrastructure

A network of multi-functional green space which delivers benefits to both the environment and the local community. Green infrastructure includes natural green spaces colonised by plants and animals and man-made managed green spaces such as areas used for outdoor sport and recreation including public and private open space. These spaces may include allotments, urban parks and designed historic landscapes as well as their many interconnections such as footpaths, cycleways, green corridors and waterways.

Greenfield land (or site)

Land which has not previously been built on, including land in use for agriculture or forestry. Greenfield land does not include residential garden land.

Growth Triangle

An area to the north-east of Norwich identified for major growth.

Habitat Regulations Assessment (HRA)

An HRA identifies any aspect of the emerging Local Plan that would have the potential to cause a likely significant effect on Natura 2000 sites or sites protected by European designations (Special Areas of Conservation, Special Protection Areas, Ramsar sites) either in isolation or cumulatively, and to identify appropriate avoidance and mitigation strategies where impacts are identified.

Health Impact Assessment

An assessment required for large sites and for any housing proposal with a significant amount of housing for the elderly to show how the health care infrastructure needs of the new development are provided for.

Heritage Asset

A building, monument, site, place, area or landscape with historic interest that provides a material record of history or meaning for a community. Heritage assets may be either 'designated' or 'non-designated' and have a degree of significance that merits consideration in planning decisions.

Historic environment

Aspects of the environment which result from the interactions between people and places through time.

Inclusive Growth

A form of economic growth that aims to improve opportunities for everyone in the local community.

Index of Multiple Deprivation

A ward-level index made up from six indicators (income; employment; health deprivation and disability; education; skills and training; housing; and geographical access to services)

Infill development

Small-scale development filling a gap within an otherwise built up area.

Infrastructure

The network of services to which it is usual for most buildings or activities to be connected. Infrastructure includes physical services serving the development (e.g. gas, electricity and water supply; telephones, sewerage) and includes networks of roads, public transport routes, footpaths etc as well as community facilities and green infrastructure.

Joint Core Strategy (JCS)

A key planning policy document for the Greater Norwich Area produced in partnership between Broadland, Norwich and South Norfolk that sets out the long-term vision for the area up until 2026. The JCS has a considerable impact on the Greater Norwich Local Plan (GNLP) which in turn determines growth up until 2038 and will supersede the JCS when adopted.

Knowledge economy

The production, distribution, and use of knowledge as the main driver of growth, wealth creation, and employment across all industries. It does not rely solely on a few advanced technology industries but is applicable to traditional industries, such as manufacturing and agriculture.

Knowledge-intensive jobs

A knowledge-intensive job is one where the workers need a lot of education, skills and experience to work effectively. In Greater Norwich these mainly include jobs in: research in the food, health and life sciences sectors; agri-tech; advanced manufacturing and engineering; IT and communications and digital creative industries.

Local Nature Reserve (LNR)

Area of botanical or wildlife interest where access and use by local people is encouraged through designation by the local authority.

Local centre

A group of shops or services forming a centre of purely local significance. See city centre and district centre.

Local housing need

An assessment of the need for housing at a local level over a period of time using the standard methodology set out by the Government.

Local Transport Plan

A five-year integrated transport strategy, prepared by local authorities in partnership with the community, seeking funding to help provide local transport projects. The plan sets out the resources predicted for delivery of the targets identified in the strategy.

London-Stansted-Cambridge Corridor and the Cambridge-Milton Keynes-Oxford Arc (CaMkOx)

These are two different growth corridors of vital economic importance to the UK that host a highly skilled labour force, cutting edge research facilities and technology clusters that can compete on a global scale which are supported by two world-class universities.

Low carbon

Minimisation of carbon dioxide emissions from a human activity.

Major development

For housing, development where 10 or more dwellings are to be provided or the site has an area of 0.5 hectares or more. For non-residential development, it means additional floorspace of 1,000m^2 or more or a site of 1 hectare or more.

Major Road Network

A classification of major local authority roads in England to help reduce congestion, support economic growth and rebalancing, support housing delivery, support all road users and support the Strategic Road Network (SRN). In Greater Norwich these are the A140 (including the A1270) and the A146.

Market Housing

Housing that is for sale on the open market without restrictions on pricing or tenure.

Market Town Network Improvement Strategies

A Norfolk County Council initiative to implement studies into the transport impacts of growth in market towns that help to identify and plan interventions ahead of any planned growth.

Masterplan

A long-term planning document that provides a conceptual framework to guide future growth and development, usually on large sites.

Modal shift

An increase in the proportion of people travelling by different forms of transport. It is usually used in relation to measures to encourage public transport use and cycling and walking.

National Planning Policy Framework (NPPF)

A document which sets out the Government's economic, environmental and social planning policies for England and how they should be applied. It provides a baseline structure from which locally-prepared plans (such as the GNLP) can be produced and it is a material consideration in planning decisions.

National Planning Practice Guidance (NPPG)

A web-based resource which brings together planning guidance on various topics into one easily accessible place. The guidance supports the NPPF but is not government policy.

Natural Capital

The elements of nature that directly or indirectly produce value to people, including ecosystems, species, fresh water, land, minerals, the air and oceans, as well as natural processes and functions. Natural capital includes many different components of the living and non-living natural environment, as well as the processes and functions that link these components and sustain life. Natural capital is often referred to in terms of Natural Assets.

Natural Asset

A distinctive component of natural capital as determined by the functions it performs, e.g. soils, fresh water and species. Assets are not mutually exclusive and there is overlap between categories (for example, soils include species, minerals, and water).

Neighbourhood Plan

A plan prepared by a parish/town council or neighbourhood forum for a designated neighbourhood area. Once made by the local planning authority it becomes part of the development plan for the area.

New Anglia Local Enterprise Partnership (LEP)

An organisation of private and public-sector representatives working with businesses, local authority partners and education institutions to drive growth and enterprise in Norfolk and Suffolk.

Non-strategic policies

Policies contained in a Neighbourhood Plan, or those policies in a local plan that are identified as non-strategic policies.

Norfolk and Suffolk Local Industrial Strategy

An emerging strategy building upon the Economic Strategy for Norfolk and Suffolk which will consider in greater detail the competitive strengths of the regions and focus on the clean energy, agri-food and ICT/ digital sectors.

Norfolk Strategic Planning Framework (NSPF)

A policy document which brings together Norfolk's Local Planning Authorities to create a framework that all local authorities formally use to meet shared objectives on a range of strategic cross-boundary planning issues.

Northern Distributor Road (NDR)

A dual-carriageway road (also known as the A1270 Broadland Northway) completed in 2019 to the north of Norwich, linking the A47 to the south-east of the city with the A1067 in the north-west.

Norwich Area Transportation Strategy (NATS)

Statement of strategic transportation policy for Norwich and surrounding area, most recently adopted in 2004.

Norwich fringe

Area next to the city of Norwich but lying in Broadland and South Norfolk districts which is predominantly developed, including open spaces encompassed within the developed area. The Norwich fringe is the built-up parts of the fringe parishes of Colney, Costessey, Cringleford, Drayton, Easton, Hellesdon, Old Catton, Sprowston, Taverham, Thorpe St. Andrew, Trowse and the remainder of the Growth Triangle including Rackheath.

Norwich Research Park

A major research park that is a leading centre for science and technology as well as food and health.

Norwich urban area

The City of Norwich and the Norwich fringe (see above).

Open Space

Areas of land that usually come forward as part of a development site which remain undeveloped but can generally be used for either formal or informal recreation purposes.

Park and Ride

Parking areas at the edge of the built-up area and linked by frequent bus (or other public transport) services to the city centre.

Planning conditions

A condition imposed on a planning permission which can either require additional details to be agreed or restrict the use of the site.

Planning obligations

Legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer to ensure that specific works are carried out, payments made, or other actions undertaken which would otherwise be outside the scope of the planning permission. Often called Section 106 obligations. The term legal agreements may embrace S106.

Post-carbon Economy

An economy in which greenhouse gas emissions are low and falling. In Greater Norwich the focus will be on three low carbon, high growth economic sectors: clean energy, agri-food and ICT/digital.

Previously developed land

See Brownfield land.

Primary Shopping Area

A defined area in which retail development is concentrated

Protected species

Any species which, because of its rarity or threatened status, is protected by statutory legislation (The Wildlife and Countryside Act 1981 (as amended) and the Conservation (Natural Habitats etc) Regulations 1994).

Ramsar site

A European designation that protects areas of wetland.

Recreational Impact Avoidance and Mitigation Strategy (RAMS)

A strategy facilitating residential development, whilst at the same time adequately protecting wildlife sites from harm that comes with growth in rural areas from increased recreation pressure.

Renewable energy

Energy generated from sources which are non-finite or can be replenished. Includes solar power, wind energy, power generated from waste, biomass etc.

Scheduled Ancient Monument

Ancient structure, usually unoccupied, above or below the ground, which is preserved by order of the Secretary of State. Works affecting an ancient monument must be approved by the Secretary of State.

Section 106 Agreement (S106)

See planning obligations

Self-build housing and custom-build housing

Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing.

Semi-islanded (energy supply)

A semi-islanded development site is connected to the wider electricity network but uses on-site generation or storage to reduce the site’s reliance on imported electricity and reduce peak demands.

Settlement Hierarchy

A way of arranging settlements into a hierarchy based upon several criteria, such as population and services offered.

Settlement limit, settlement boundary

These are areas within which development appropriate to the settlement in question will usually be permitted. Sometimes called village envelopes or development boundaries.

Site Allocation DPD

A document used to identify sites to accommodate the range of land uses necessary to implement the objectives of the local plan. Broadland adopted a site allocations document in 2016, Norwich in 2014, and South Norfolk in 2015. The GNLP will carry forward deliverable undeveloped allocations from these plans.

Site of Special Scientific Interest (SSSI)

Site or area designated as being of national importance because of its wildlife, plants or flower species and/or unusual or typical geological features. SSSIs are identified by Natural England and have protected status under the Wildlife and Countryside Act 1981.

Social Sustainability

The ability of a community to not only meet the needs of its current members but also support the ability of future generations to maintain a healthy and liveable community, including supporting local services and providing affordable homes (as highlighted in the Taylor Review "Living Working Countryside, 2008").

Spatial profile

A section in the local plan that provides context about the local area from social, economic and environmental perspectives. It describes the area, how it functions and highlights the key issues to be addressed.

Special Area of Conservation (SAC)

Special Areas of Conservation are defined in the European Union's Habitats Directive (92/43/EEC), also known as the Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora. They are defined to protect the 220 habitats and approximately 1,000 species listed in Annex I and II of the Directive which are of European interest following criteria given in the Directive.

Special Protection Areas (SPAs)

Special Protection Areas are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive, which was amended in 2009 (Directive 2009/147/EC). They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species.

Strategic policies

Policies and site allocations which address strategic priorities in line with Section 19 of the Planning and Compulsory Purchase Act 2004.

Strategic urban extensions / strategic housing growth locations

These locations will each provide over 1,000 new homes from 2018 to 2038

Suitable Alternative Natural Green Space (SANGS)

A name given to green space that is of a quality and type suitable to be used as mitigation in relation to the protection of important natural spaces when residential development or growth is proposed.

Supplementary Planning Document (SPD)

Guidance published by the local planning authorities to provide further detailed information on how local plan policies are to be applied or interpreted. SPDs may be prepared jointly, particularly where a consistent policy approach is required over an area covered by more than one local planning authority. SPDs may be concerned with an issue or may provide more detailed guidance of the development of a specific site, covering a whole range of issues. This is frequently referred to as a development brief.

Sustainability Appraisal (SA)

An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.

Sustainable development

A term mostly derived from the 1987 Brundtland Report. Interpretation varies but typically the term means meeting economic and social goals without undermining the environment, as well as meeting needs of the present without compromising the environment for future generations. In 2015 the United Nations agreed 17 Sustainable Development Goals to be reached by 2030. The UK is amongst the countries leading the delivery of the Sustainable Development Goals.

Sustainable drainage system (SuDS)

Efficient drainage system which seeks to minimise wastage of water, including the use of appropriate groundcover to enable maximum penetration of clean water run-off into the ground and, where appropriate, recycling grey water within the development. Designed to minimise the impact of development on the natural water environment.

Transforming Cities

A term used to denote the aim of Government policy to improve productivity and spread prosperity through investment in public and sustainable transport.

Transport for Norwich

A programme of work to improve accessibility by all forms of transport around Norwich and the surrounding area. It aims to encourage the use of more sustainable modes of transport, while also improving the capacity of the road network and stabilise traffic levels. Transport for Norwich was formerly known as the Norwich Area Transport Strategy.

Travel to work public transport

Typically, this will be a regular bus service operating between 07:00 and 19:00 with a thirty-minute frequency of service and a journey time of not more than 30-40 minutes to Norwich or another recognised employment location.

Uplift

Increased density of housing, most commonly on a previously allocated site.

Village cluster

A group of villages that share services and facilities, for example a primary school.

Water stress

Water stress occurs when the demand for water exceeds the available amount of water, or when poor water quality restricts its use. Greater Norwich and the wider region are defined by the Environment Agency as a water stressed area.

Western Link

The proposed development of a road to connect the Broadland Northway or Northern Distributor Road (NDR) from the A1067 to the A47 west of Norwich.

Windfall site

Site on which planning permission for housing development is granted during the plan period, but which has not previously been identified in a plan for housing development.

Appendix 3 Monitoring Framework

An essential part of the local plan is monitoring its implementation through the collection of relevant information. The most valuable data source for how well the local plan is being implemented comes from planning application decisions. Other pertinent data about whether the local plan's over-arching vision and objectives are being achieved comes from data collected by central government and other public sector agencies.

Indicator Code	Theme	Indicator
GNLP Communities objective – To grow vibrant, healthy communities giving people a high quality of life in well-designed developments with good access to jobs, services and facilities, helping to close the gap between life chances in disadvantaged and other communities.		
GNLP1	Population and communities	To improve the district authority ranking of the least deprived communities in England, taken from the seven domains of the English Indices of Multiple Deprivation.
GNLP2	Education	To improve the district authority ranking for access to education, skills and training, taken from the English Indices of Multiple Deprivation.
GNLP3	Education	To minimise the number of planning approvals granted contrary to the advice of Norfolk County Council Education department, based upon the proximity to or capacity of local school provision.
GNLP4	Health	To improve the district authority raking for Improving health and wellbeing by measuring the risk of premature death and the impairment of quality of life through poor physical or mental health, taken from the English Indices of Multiple Deprivation.
GNLP5	Health	To minimise the number of planning approvals granted contrary to the advice of NHS organisations or Public Health Norfolk, based upon the capacity of healthcare provision or incompatibility with public health objectives.
GNLP6	Health	To improve the percentage of physically active adults, taken from Public Health England data.
GNLP7	Crime	To improve the district authority ranking for reducing the risk of crime, both risk of personal and material victimisation, taken from the English Indices of Multiple Deprivation.
GNLP Economy objective – To support and promote clean growth and progress towards a post-carbon economy through the expansion of internationally important knowledge-based industries in the Cambridge Norwich Tech Corridor as part of an entrepreneurial, enterprising, creative and broad-based economy with high productivity and a skilled workforce.		
GNLP8	Jobs	To increase the annual count of jobs, taken from the Business Register and Employment Survey (BRES) across the local plan area.
GNLP9	Employment	To increase the employment rate of the economically active population, taken from the official labour market statistics, Nomis).
GNLP10	Earnings	To increase median earnings: a) hourly b) weekly c) annual pay for full-time employees, taken from the Annual Survey of Hours and Earnings (ASHE) by the Office of National Statistics.
GNLP11	Skills	To increase the percentage of workforce employed in higher occupations (official labour market statistics, Nomis).
GNLP12	City centre retailing floorspace	To monitor the net change in retail floorspace in Norwich City Centre.
GNLP13	Business floorspace	To increase total business floorspace (sqm) in: a) Norwich b) Broadland c) South Norfolk, taken from Valuation Office Agency (VOA) data.
GNLP14	New employment sites	To monitor office (B1), industrial (B2), and storage / distribution (B8) floorspace implemented on allocated sites.
GNLP15	New employment sites	To monitor office (B1), industrial (B2), and storage / distribution (B8) floorspace implemented on non-allocated sites.
GNLP Environment objective – To protect and enhance the built, natural and historic environments, make best use of natural resources, and to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change and plays a full part in meeting national commitments to achieve net zero greenhouse gas emissions by 2050.		
GNLP16	Climate change	To minimise carbon dioxide equivalent emissions per capita to contribute to meeting the national target to bring all greenhouse gas emissions to net zero by 2050, taken from the Department for Business, Energy and Industrial Strategy data. The GNLP will support achievement of any objectives or targets identified in adopted local strategies.
GNLP17	Air quality	To minimise nitrogen dioxide and airborne particulates measured at:

Indicator Code	Theme	Indicator
		a) Castle Meadow b) Lakenfields (proxy close to city centre)
GNLP18	Biodiversity	To increase the percentage of SSSIs in 'favourable condition' or 'unfavourable recovering condition', by district area, taken from Natural England data.
GNLP19	Biodiversity	To increase the percentage of local conservation sites in "positive conservation management", taken from Norfolk Wildlife Trust.
GNLP20	Biodiversity	To minimise the number of planning approvals granted contrary to the advice of Natural England or Norfolk Wildlife Trust (on behalf of the County Wildlife Partnership) or the Broads Authority on the basis of adverse impact on a site of acknowledged biodiversity importance.
GNLP21	Green infrastructure	To increase the percentage of allocated residential sites, or sites permitted for development of 10 or more homes, that have access to a semi-natural green space of at least 2 ha within 400m.
GNLP22	Green infrastructure	To increase the total hectares of accessible public open space (cumulative) provided as a consequence of a planning condition, section 106 obligation or CIL investment within the plan period.
GNLP23	Green infrastructure	To increase the length of new greenway (defined as a shared use, car-free off-road route for a range of users and journey purposes) provided as a consequence of a planning condition, section 106 obligation or CIL investment.
GNLP24	Landscape	To minimise the number of planning approvals granted contrary to the advice of the Broads Authority based on adverse impact on the Broads landscape.
GNLP25	Condition of heritage assets	To reduce the number (and percentage) of buildings at risk: a) listed buildings b) scheduled ancient monuments on the Buildings at Risk Register, taken from Historic England data.
GNLP26	Renewable energy	To increase sustainable and renewable energy capacity permitted by type (where not ancillary to other types of development).
GNLP27	Renewable energy	To achieve 100% against the renewable energy policy: a) for housing to achieve a 20% reduction against Part L of the 2013 Building Regulations; b) for appropriate non-residential uses over 500 sqm in floorspace to achieve the BREEAM "Very Good" energy efficiency standard or its equivalent successor.
GNLP28	Use of previously developed land	To maximise the percentage of new and converted dwellings on previously developed land
GNLP29	Use of greenfield land	To minimise the number of planning permissions granted on non-allocated sites on class 1, 2 or 3a agricultural land.
GNLP30	Flood risk	To minimise the number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence or water quality grounds.
GNLP31	Water	To achieve 100% against the water efficiency policy for new homes of 110 litres per person per day.
GNLP Homes objective – To enable delivery of high-quality homes of the right density, size, mix and tenure to meet people's needs throughout their lives and to make efficient use of land.		
GNLP32	Housing	The total number of new dwellings (all tenures) completed.
GNLP33	Housing	The total number of new affordable tenure dwellings completed.
GNLP34	Housing	To monitor dwelling completions by size (bedroom number) and to aim to be within a 10% tolerance of the most recent sub-regional housing market assessment.
GNLP35	Gypsy and Traveller sites	To monitor the number of Gypsy and Traveller pitches granted planning permission against the requirements of the accommodation needs assessment.
GNLP36	Affordable housing	To monitor the percentage of sites of 10 or more homes that achieve 33% affordable housing.
GNLP37	Adaptable housing	Percentage of sites of 10 or more homes where 20% are accessible and adaptable, as defined by Building Regulation M4(2).
GNLP38	Housing space standards	For 100% of new dwellings to meet the government's Nationally Described Space Standards (NDSS).
GNLP39	Custom build	Percentages of sites of 40 dwellings or more (excluding flats) where 5% of plots are provided for custom build.

Indicator Code	Theme	Indicator
GNLP Infrastructure objective – To promote the timely delivery of infrastructure to support existing communities, growth and modal shift in transport use; and to improve connectivity to allow access to economic and social opportunities.		
GNLP40	Highways	To minimise the number of planning approvals granted contrary to the advice of Norfolk County Council Highways department, based upon access or surrounding road network constraints.
GNLP41	Transport and access to services	To improve the district authority ranking for reducing the barriers to housing and services, taken from the English Indices of Multiple Deprivation.
GNLP42	Sustainable transport	To monitor the percentage of major planning permissions with a planning obligation towards the provision of new footways, cycleways or public transport provision (excluding CIL).
GNLP Delivery objective – To promote the delivery of housing, jobs and infrastructure to meet identified needs, supported by intervention mechanisms where the market is unable to deliver.		
GNLP43	Growth delivery and 5-year land supply of housing	To monitor the number of site allocations provided with pre-application advice.
GNLP44	Growth delivery and 5-year land supply of housing	To monitor the number of site allocations with outline consent given.
GNLP45	Growth delivery and 5-year land supply of housing	To monitor the number of site allocations with full/reserved matters consents given.
GNLP46	Growth delivery and 5-year land supply of housing	To monitor the number of site allocations where development has commenced (with percentage of homes and/or floorspace completed).
GNLP47	Growth delivery and 5-year land supply of housing	To monitor the non-allocated sites with outline consent given.
GNLP48	Growth delivery and 5-year land supply of housing	To monitor the non-allocated sites with full/reserved matters consents given.
GNLP49	Growth delivery and 5-year land supply of housing	To monitor the non-allocated sites where development has commenced (with percentage of homes and/or floorspace completed).

Alternative approaches

Preparing the indicators for monitoring the local plan requires pragmatism. Rarely is data available for the ideal geographical area, time period sought, or covering the exact topic required to be relevant to the local plan, and so compromise is necessary. Nevertheless, scope exists to explore reasonable alternatives, and so views are welcome on additional or alternative monitoring indicators to the ones proposed here.

Use of data from central government and other public agencies

Information from sources like the English Indices of Multiple Derivation are readily available, reliable, and allow easy comparison for bench-marking Greater Norwich against other local authority areas, but such data is not without disadvantages. Data may only be published every few years, and changes maybe more attributable to other socio-economic and environmental factors outside the control of the local plan.

Measuring implementation of the local plan from planning application records

Data from planning applications is often the best source of information about whether a local plan is being affectively implemented. For example, data from planning applications will show which site allocations are being implemented. Nevertheless, there are limitations, such as in using planning application data to demonstrate how well the overall objectives of a local plan are being achieved.

Appendix 4: Plans to be superseded and plans to be carried forward

Plans proposed to be superseded by the Greater Norwich Local Plan 2022-2038:

- The Joint Core Strategy for Broadland, Norwich and South Norfolk (2011 and subsequently readopted 2014)
- Broadland Site Allocations Development Plan Document (2016)
- Norwich Site Allocations and Site-Specific Policies Local Plan Document (2014)
- South Norfolk Local Plan Site Specific Allocations and Policies Document (2015)

Plans to be carried forward and used in conjunction with the Greater Norwich Local Plan 2022-2038:

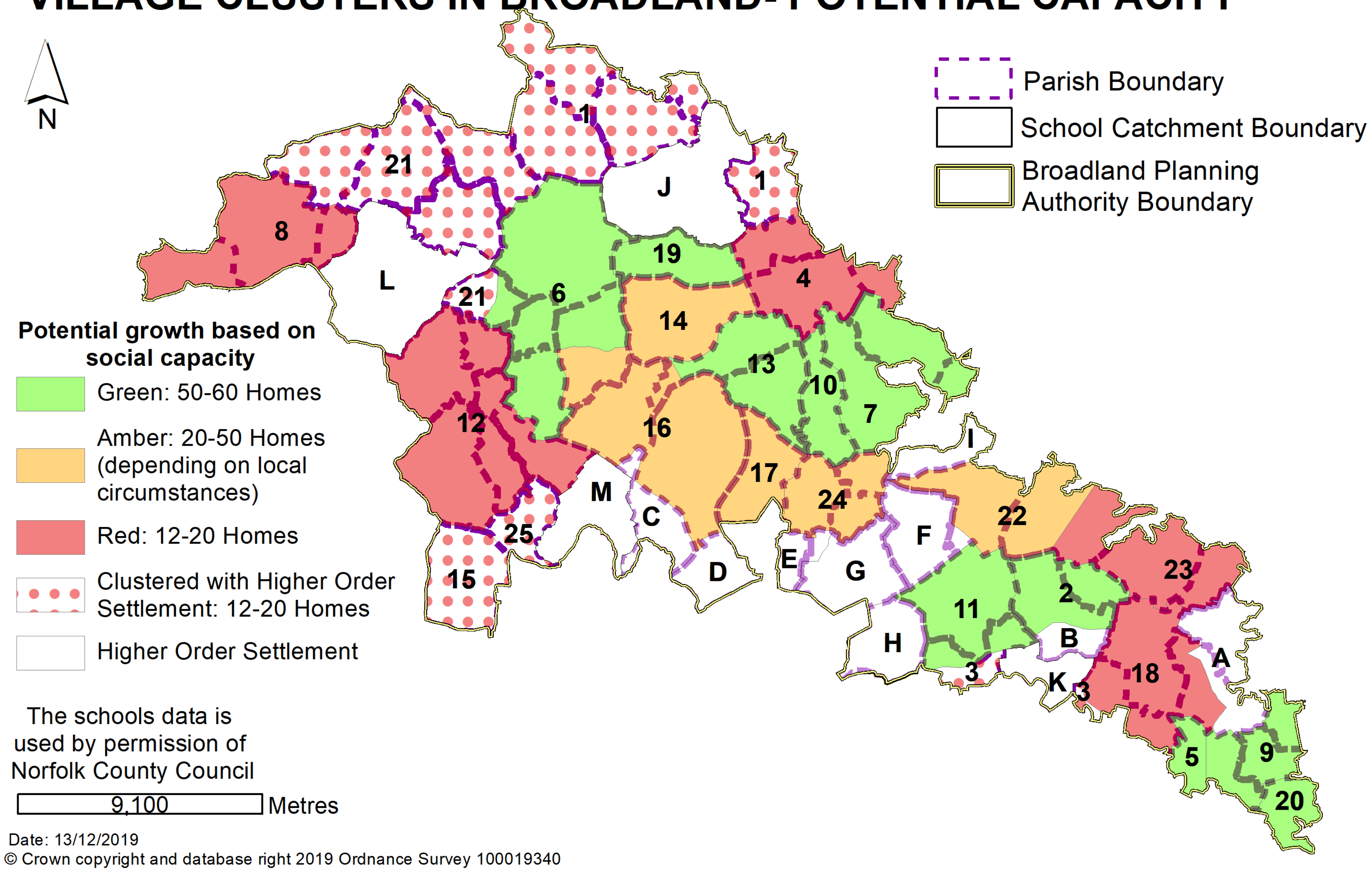
- Old Catton, Sprowston, Rackheath & Thorpe St Andrew Growth Triangle Area Action Plan (2016)
- Long Stratton Area Action Plan (2016)
- Wymondham Area Action Plan (2015)
- Broadland Development Management Policies Document (2015)
- Norwich Development Management Policies Document (2015)
- South Norfolk Development Management Policies Document (2015)

Neighbourhood plans to be used in conjunction with the Greater Norwich Local Plan 2022-2038:

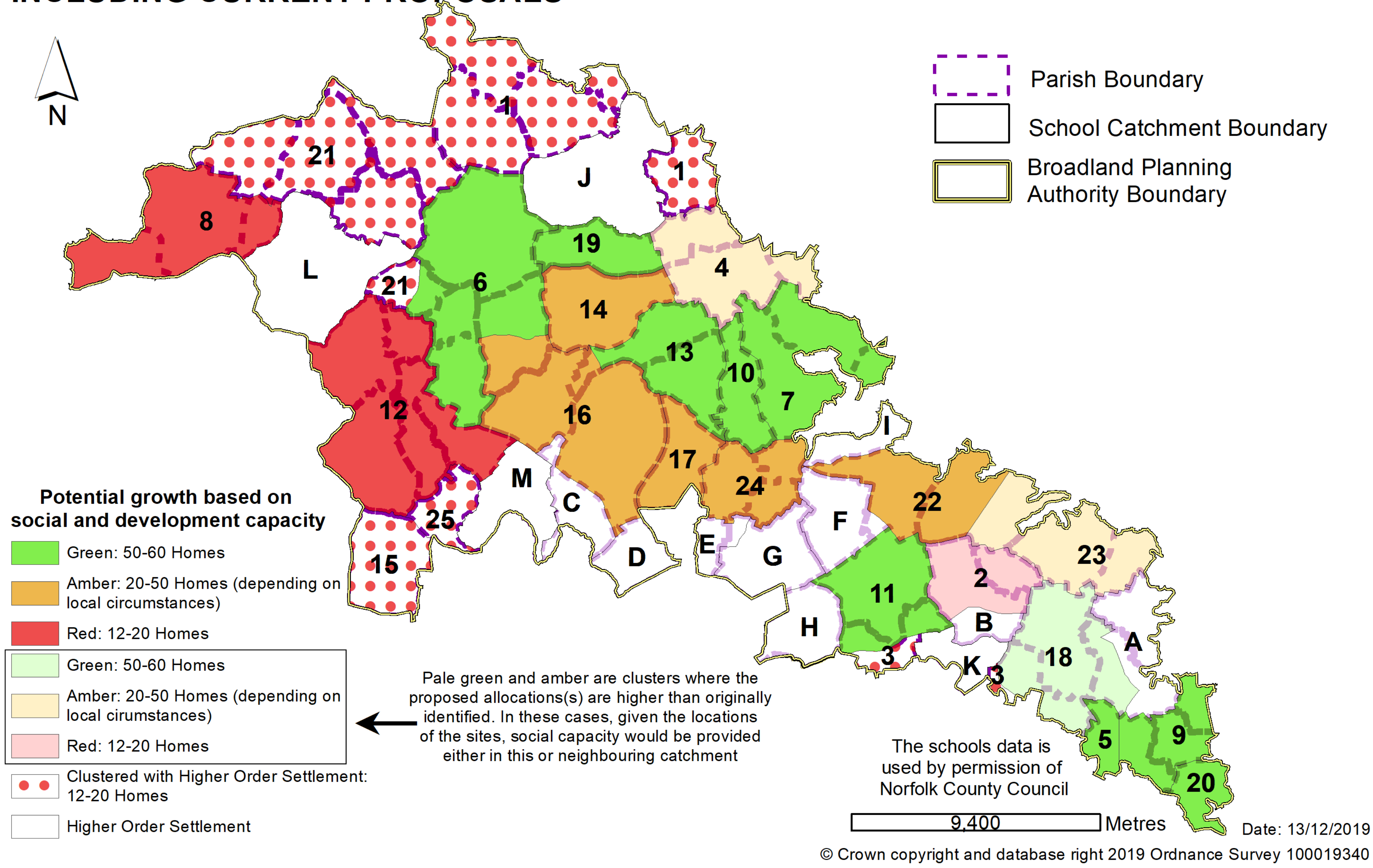
Parish	Authority	Date Made	End Date
Acle	BDC	February 2015	2026
Aylsham	BDC	July 2019	2038
Blofield	BDC	July 2016	2036
Brundall	BDC	May 2016	2026
Drayton	BDC	July 2016	2026
Gt & Lt Plumstead	BDC	July 2015	2034
Hellesdon	BDC	December 2017	2026
Horsford	BDC	July 2018	2038
Old Catton	BDC	July 2016	2035
Rackheath	BDC	July 2017	2037
Salhouse	BDC	July 2017	2026
Sprowston	BDC	May 2014	2026
Strumpshaw	BDC	July 2014	2026
Wroxham	BDC	March 2019	2039
Cringleford	SNC	January 2014	2026
Easton	SNC	December 2017	2042
Mulbarton	SNC	February 2016	2030

In addition, there are 7 qualifying bodies in Broadland which have designated their neighbourhood area and 5 in South Norfolk. This means they have committed to developing a neighbourhood plan. There is also one neighbourhood area designated within Norwich. Of the places preparing neighbourhood plans at least four are well-advanced. Subject to their submission and success at referendum, plans for Taverham and Spixworth in Broadland, and Long Stratton and Poringland in South Norfolk, could be made in the first half of 2020.

APPENDIX 5: MAP 1
VILLAGE CLUSTERS IN BROADLAND- POTENTIAL CAPACITY



APPENDIX 5: MAP 2
VILLAGE CLUSTERS IN BROADLAND- POTENTIAL CAPACITY INCLUDING CURRENT PROPOSALS



In addition to the existing commitment of 995 homes in the village clusters in Broadland, new site allocations are made in the GNLP Sites Plan for the following number of homes in village clusters in Broadland through this plan. Please note that some parishes cluster with settlements higher in the settlement hierarchy e.g. Blickling, Burgh & Tuttington and Oulton cluster with Aylsham as it provides the local primary school. The table only shows the housing numbers for the village clusters, with housing numbers for the higher order settlements set out in policies 7.1 to 7.3 of the plan.

Map Reference	Total Dwellings	Village Cluster
1	**0**	**Aylsham, Blickling, Burgh & Tuttington and Oulton**
	Main Town	*Aylsham*
	0	Blickling
	0	Burgh & Tuttington
	0	Oulton
2	**12-20**	**Blofield Heath and Hemblington**
	12-20	Blofield Heath
	0	Hemblington
3	**0**	**Brundall and Postwick with Witton**
	Key Service Centre	*Brundall*
	0	Postwick with Witton
4	**30-40**	**Buxton with Lamas and Brampton**
	30-40	Buxton with Lamas
	0	Brampton
5	**0**	**Cantley**
6	**30-40**	**Cawston with Brandiston and Swannington**
	30-40	Cawston
	0	Brandiston
	0	Swannington
7	**20-25**	**Coltishall with Horstead Belaugh**
	20-25	Coltishall
	0	Horstead
	0	Belaugh
8	**12-15**	**Foulsham and Themelthorpe**
	12-15	Foulsham
	0	Themelthorpe
9	**30-40**	**Freethorpe, Halvergate and Wickhampton**
	30-40	Freethorpe and Wickhampton
	0	Halvergate
10	**0**	**Frettenham**
11	**0**	**Great and Little Plumstead**
12	**15-20**	**Great Witchingham, Lenwade, Weston Longville, Alderford, Attlebridge, Little Witchingham and Morton on the hill**
	15-20	Great Witchingham and Lenwade
	0	Weston Longville
	0	Alderford
	0	Attlebridge
	0	Little Witchingham
	0	Morton on the hill
13	**0**	**Hainford and Stratton Strawless**
	0	Hainford
	0	Stratton Strawless
14	**0**	**Hevingham**
15	**12**	**Honingham (clustered with Easton in South Norfolk)**
	Norwich Urban Area	*Easton*
	12	Honingham
16	**30-40**	**Horsford, Felthorpe and Haveringland**
	30-40	Horsford
	0	Felthorpe
	0	Haveringland
17	**20-30**	**Horsham and Newton St Faiths**
18	**50-60**	**Lingwood & Burlingham, Strumpshaw and Beighton**
	50-60	Lingwood & Burlingham
	0	Strumpshaw
	0	Beighton
19	**25-35**	**Marsham**
20	**40-60**	**Reedham**
21	**0**	**Reepham, Booton, Guestwick, Heydon, Salle and Wood Dalling**
	Key Service Centre	*Reepham*
	0	Botton
	0	Guestwick
	0	Heydon
	0	Salle
	0	Wood Dalling
22	**12-15**	**Salhouse, Woodbastwick and Ranworth**
	12-15	Salhouse
	0	Woodbastwick
	0	Ranworth
23	**20-25**	**South Walsham and Upton with Fishley**
	20-25	South Walsham
	0	Upton with Fishley
24	**0**	**Spixworth and Crostwick**
	0	Spixworth
	0	Crostwick
25	**0**	**Taverham and Ringland**
	Norwich Urban Area	*Taverham*
	0	Ringland

Settlements higher in the Hierarchy

See policies 7.1 to 7.3 for housing allocations in the following locations.

Map Reference	Settlement	
A	*Acle*	*Key Service Centre*
B	*Blofield*	*Key Service Centre*
C	*Drayton*	*Norwich Urban Area*
D	*Hellesdon*	*Norwich Urban Area*
E	*Old Catton*	*Norwich Urban Area*
F	*Rackheath*	*Norwich Urban Area*
G	*Sprowston*	*Norwich Urban Area*
H	*Thorpe St Andrew*	*Norwich Urban Area*
I	*Wroxham*	*Key Service Centre*
J	*Aylsham*	*Main Town*
K	*Brundall*	*Key Service Centre*
L	*Reepham*	*Key Service Centre*
M	*Taverham*	*Norwich Urban Area*

Additional Appendices for Regulation 19 version of the plan

Appendix 6 Amendments to policies maps

Appendix 7 Superseded policies

Appendix 8 How plan policies implement the GNLP's objectives

Appendix 9 Housing delivery trajectories

PREFERRED SITES: NORWICH

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Norwich				
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**.	This is a prominent brownfield site in the northern city centre which is long term vacant and offers the potential for beneficial regeneration and redevelopment including improved access to the river.
UEA - Land adjoining the Enterprise Centre at Earlham Hall (walled garden and nursery)	GNLP0133-B	1.38	University-related uses, including offices (Use class B1(a)), research and development (Use class B1(b)) and educational uses (Use class D1) providing in the region of 5,000 sqm of floorspace	The principle of development has been established by virtue of the existing local plan allocation (R39) and outline planning permission. Its allocation remains appropriate to support programmed expansion of the UEA as set out in the emerging Development Framework Strategy (DFS).
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.	The principle of development has been established by virtue of the existing local plan allocation (R40) and consented and partly completed scheme for student accommodation. Its allocation remains appropriate to support programmed expansion of the UEA as set out in the emerging Development Framework Strategy (DFS). As an extant consent and previous allocation; this site is been counted in the commitment figures.
UEA – Land between Suffolk Walk and Bluebell Road	GNLP0133-D	2.74	University related development for both academic and non-academic uses.	The principle of development has been established by virtue of the existing local plan allocation (R41) as a strategic reserve for university expansion. Its allocation for development remains appropriate to support programmed expansion of the UEA as set out in the emerging Development Framework Strategy (DFS).
UEA - Land at the Grounds Depot Site, Bluebell Road	GNLP0133-E	1.60	Student accommodation, in the region of 400 beds (equivalent to	The site has been developed and in operational use for several years as a ground's maintenance depot. Although in a prominent and sensitive river valley location with

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Norwich				
			160 homes) which may include a small element of ancillary university related uses	respect to the campus and the UEA Broad, on balance it is considered that the site offers the best opportunity to accommodate limited development to support the expansion of the UEA and will enable further enhancement and greater public access to the river valley, with the proviso that any development must be sensitively designed and integrated into the landscape.
Land at Constitution Motors, 140-142 Constitution Hill	GNLP0282	0.27	Redevelopment for a minimum of **12 homes**.	The site is located in a predominantly residential area and is appropriate for residential use. It now has benefit of outline planning permission, as such has been counted in the commitment figures
Land at the Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former May Gurney site at Trowse in South Norfolk	GNLP0360	21.90	Residential led mixed use development including housing, community, education and leisure facilities, local employment and retail, local greenspace, biodiversity areas and recreational open space together with all necessary supporting vehicular, pedestrian, cycle and public transport access infrastructure. **680 homes**.	This strategic regeneration opportunity site in east Norwich and including land at Trowse has benefit of outline planning permission for up to 680 homes, commercial uses, recreational open space and transport infrastructure, valid until 2023. It is a long-term strategic development priority for Greater Norwich and would secure major economic and regeneration benefits but is subject to complex constraints identified through the HELAA. Development potential of this land alongside the neighbouring Utilities site and land potentially available through the release of the former Carrow Works site is recognised through a wider strategic growth allocation across the three sites which is expected to deliver a total of approximately 2,000 homes. *Note that the May Gurney site falls within Trowse parish and approximately 90 homes of the 680 approved are included within the housing commitment for Trowse parish.*
Former Eastern Electricity	GNLP0401	0.83	Residential-led mixed-use	This long-term vacant regeneration opportunity site was previously

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Norwich				
Headquarters (Dukes Wharf), Duke Street			development including a minimum of **100 homes** (or at least 250 student bedrooms). May also include employment, managed workspace retail, leisure, financial and professional services, education and cultural uses.	allocated for office-led development in the adopted local plan (CC21) but remains stalled despite a succession of consented schemes. Allocation in the GNLP is wholly appropriate to recognise its considerable potential for regeneration for both housing and commercial uses taking advantage of its riverside site and highly accessible city centre location close to the primary shopping area. 69 units are counted in the existing commitment, the site is expected to deliver an uplift of an additional 31 units.
Land at Barrack Street/ Whitefriars	GNLP0409R	3.78	Residential led mixed use development (minimum **300 homes**), offices/managed workspace, ancillary retail, restaurants, bars and recreational open space.	This key regeneration site in the city centre is long term vacant. It is appropriate to amalgamate the existing adopted local plan allocations CC17a and CC17b in a single allocation which acknowledges the acceptance in principle of current proposals to develop its western half nearest to Whitefriars for a residential-led scheme. Outline and detailed consents on its eastern half provide for 200 homes and offices to deliver the remaining phases of the St James Place office quarter which is counted in the existing commitment. The allocated site is expected to deliver an uplift of an additional 100 homes
Land adjoining Sentinel House (St Catherine's Yard), Surrey Street	GNLP0451	0.38	Residential development (minimum **40 homes** or 200 student bedrooms)	Following the conversion of Sentinel House to 199 apartments it is no longer appropriate to allocate the entire site as initially proposed although land to the east remains suitable for development. This is acknowledged in adopted local plan allocation CC29, albeit that the majority of the Queens Road Car Park will not now be available and is excluded. An allocation for housing or student accommodation reflects a form of development already supported in

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Norwich				
				principle on this site. As the proposed site is part of previous allocation, the figures are counted in the current commitment.
Land at and adjoining Anglia Square	GNLP0506	4.79	Residential-led mixed-use development including in the region of **1200 homes**, student accommodation, retail units, offices and flexible workspace, hotel, leisure and hospitality uses and community facilities as part of a balanced mix.	Anglia Square is a strategically important long-term regeneration priority in the northern city centre (previously allocated in the Northern City Centre Area Action Plan) which has great potential as a catalyst for area wide regeneration and the delivery of a significant quantum of housing contributing to Norwich's allocation requirement, alongside major economic benefits for the city and Greater Norwich as a whole. Following resolution to approve a mixed-use regeneration scheme including 1250 homes and commercial floorspace (December 2018), the application has been called-in by the Secretary of State and will now be considered at a Public Inquiry. Notwithstanding the uncertainty over the current proposals, the strategic importance and major regeneration benefits of the site require appropriate recognition in the GNLP. 198 units are counted in the existing commitment as part of an extant consent, the additional 1002 units are counted as uplift.
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.)	The principle of development has been established through previous allocation of the site for housing development in the Northern City Centre Area Action Plan and a now expired planning permission for 57 homes. Consented office to residential conversion of the Guildyard, Colegate and Seymour House, Muspole Street could already deliver 60 flats counted in the existing commitment; the additional 50 units are counted as uplift. Outline regeneration proposals have been publicised

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Norwich				
				alongside the nearby St Mary's Works site, for which there is a consented outline scheme, under the "Shoe Quarter" initiative. The building is currently used beneficially as managed workspace but in the event of more substantive development proposals the site can deliver a more substantial housing led development with significant regeneration benefits which should be acknowledged in the GNLP.
Sites at 84- 120 Ber Street, 147-153 Ber Street and Mariners Lane car park	GNLP2159	0.70	Residential development (a minimum of **150 homes**). Office or other commercial uses at ground floor level would also be acceptable with scope for educational uses in association with the adjacent Notre Dame High School being provided on the south-west side of Ber Street.	147-153 Ber Street is already allocated in the adopted local plan for housing development (CC2). The entire site was previously identified in the 2004 local plan and subject to planning permission for a total of 151 residential units granted in March 2011 but not implemented. The principle of residential development is established. The site is considered to offer considerable regeneration benefits and could deliver a significant quantum of housing including affordable housing and is thus suitable to identify in the GNLP. 20 Units are counted under existing commitment for CC2, 130 units are counted as new allocation.
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.	The site was previously allocated in the Northern City Centre Area Action Plan for housing-led development and subject to a withdrawn planning application for residential development broadly similar to the GNLP submission. The principle of residential development has been established by virtue of the previous NCCAAP allocation and the development of the site (subject to detailed design) would offer regeneration benefits as well as contributing to the affordable and general needs housing requirement for the city.

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Norwich				
				Accordingly it is suitable to identify in the GNLP.
Land West of Eastgate House, Thorpe Road	GNLP2164	0.19	Residential development (in the region of **20 homes**)	Eastgate House (former offices) adjoining has recently been converted to residential apartments mainly under prior approval as permitted development, Graphic House immediately to the west (also previously offices) has recently implemented its permission for conversion to a student large HMO. The site between these two buildings is of restricted size but could support appropriate residential development in association with the established newly converted residential accommodation adjoining. Given the surrounding pattern of uses it is considered that the site is appropriate to identify in the GNLP.
Land at Carrow Works	GNLP3053	20.00	Residential led mixed use development including housing, community, education and leisure facilities, local 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. (**1200 homes** minimum)	Carrow Works was formerly the location for Britvic Soft Drinks Ltd. And Unilever UK Ltd., and is being promoted for redevelopment. The allocation site, which also includes Carrow House owned by Norfolk County Council, is likely to accommodate at least 1200 homes contributing to an overall target of 2000 in the East Norwich strategic regeneration area. The site may also accommodate community, education and leisure facilities, local 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.

Address	Site Reference	Area (Ha)	Proposal	Reason for allocating
Norwich				
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)	The site is situated in a prominent location within the Northern City Centre strategic regeneration area and is likely to accommodate a minimum of 150 homes. It benefits from existing outline consent for redevelopment including around 150 residential units, office floor space, and a hotel. 150 units have been counted as existing commitment.
Total = 4,352 (New allocations 1,580; uplift on exiting commitment within these sites = 1,183; Existing Commitment on these sites = 1,589)				

Policy Name	Site Name	Policy Description
CC3	10-14 Ber Street	This site is allocated for residential-led mixed use development. This will accommodate a minimum of 10 homes, of which at least 3 (or 28%) should be affordable housing.
CC4a	Land at Rose Lane/Mountergate (West)	This site is allocated for mixed-use development to include high quality office space, managed workspace and live-work units, and up to 50 homes to provide affordable housing in accordance with policy 5, subject to viability considerations.
CC4b	Land at Mountergate/Prince of Wales Road	This site is allocated for mixed-use development. This may accommodate a minimum of 200 homes, to provide affordable housing in accordance with policy 5, subject to viability considerations; together with student accommodation, high quality office space, hotel and tourism uses, and other supporting main town centre uses taking advantage of the site's proximity to the rail station and river.
CC7	Hobrough Lane King Street	This site is allocated for residential-led mixed use development. This will accommodate a minimum of 20 homes, of which at least 6 (or 28%) should be affordable.
CC8	King Street Stores	This site is allocated for residential use. This will accommodate a minimum of 20 homes, of which at least 6 (or 28%) should be affordable.
CC10	Land at Garden Street and Rouen Road	This site is allocated for mixed use development. This will accommodate approximately 100 homes, of which at least 28 (or 28%) should be affordable. This site could include an element of small-scale office/business units to cater for small business.
CC11	Land at Argyle Street	This site is allocated for residential development. This will accommodate 10-15 homes, of which at least 28% should be affordable.
CC16	Land adjoining Norwich City Football club north and east of Geoffrey Watling Way	This site is allocated for mixed use development to include residential, leisure, community, office and ancillary small retail uses. This will accommodate a minimum of 270 homes, of which at least 76 (or 28%) should be affordable.
CC18	Land at 140-154 Oak Street and 70-72 Sussex Street	This site is allocated for residential use. This will accommodate a minimum of 27 homes, of which at least 8 (or 28%) should be affordable.
CC24	Land to rear of City Hall	This site is allocated for mixed use development which may include residential, offices and managed workspace, food and drink and small-scale retail uses. The alternative option of a hotel development is supported and, if this option is progressed, scope for accommodating residential

Policy Name	Site Name	Policy Description
		uses on part of the site should be investigated in order to retain its potential for housing delivery. If developed with an element of residential uses the site could accommodate a minimum of 20 homes, of which at least 6 (or 28%) should be affordable.
CC30	Westwick Street Car Park	This site is allocated for residential development. This will accommodate a minimum of 30 homes, of which at least 8 (or 28%) should be affordable.
R1	Land at Neatmarket, Hall Road	This site is allocated for employment development and light industrial use (use classes B2/B8 and B1(c)). Ancillary office development and motor trade/car sales uses on the frontage to Hall Road will also be acceptable.
R2	Ipswich Road Community Hub, 120 Ipswich Road	This site is allocated for residential development which may be provided either as general needs housing or purpose-built accommodation for older people or people with special needs. Development consolidating and expanding the existing community support and educational facilities on site will also be acceptable. If developed for residential purposes the site is expected to accommodate a minimum of 15 homes, of which at least 5 (or 33%) should be affordable.
R7	John Youngs Limited, 24 City Road	This site is allocated for residential development. This will accommodate a minimum of 45 homes, of which at least 15 (or 33%) should be affordable.
R10	Utilities Site	This site is allocated for residential led mixed-use development including housing, community, education and leisure facilities, local employment, 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 accommodate a minimum of 100 homes subject to confirmation through detailed masterplanning of the wider East Norwich Strategic Regeneration Area as defined in policy 7.1 of this plan (which in total is expected to deliver a minimum of 2000 homes, of which at least 33% should be affordable).
R13	Site of Former Gas Holder at Gas Hill	This site is allocated for residential development. This will accommodate a minimum of 15 homes, of which at least 5 (or 33%) should be affordable.
R14/ R15	Land at Ketts Hill and east of Bishop Bridge Road	This site is allocated for residential development. This will accommodate a minimum of 80 homes, of which at least 26 (or 33%) should be affordable.

Policy Name	Site Name	Policy Description
R17	Site of former Van Dal Shoes, Dibden Road	This site is allocated for residential development. This will accommodate a minimum of 25 homes, of which at least 8 (or 33%) should be affordable.
R18	Site of former Start-Rite Factory, 28 Mousehold Lane	This site is allocated for residential development. This will accommodate a minimum of 40 homes, of which at least 13 (or 33%) should be affordable.
R19	Land north of Windmill Road	This site is allocated for residential development. This will accommodate in the region of 17 homes, of which at least 6 (or 33%) should be affordable.
R20	Land east of Starling Road	This site is allocated for residential development. This will accommodate a minimum of 23 homes, of which at least 8 (or 33%) should be affordable.
R29	Two sites at Hurricane Way, Airport Industrial Estate	This site is allocated for residential led mixed use development. This will accommodate a minimum of 30 homes, of which at least 10 (or 33%) should be affordable.
R30	Land at Holt Road	This site is allocated for general employment purposes (use classes B1b/c, B2 and B8).
R31	Heigham Water Treatment Works, Waterworks Road	This site is allocated for housing led mixed use development and public open space. This will accommodate a minimum of 150 homes, of which at least 50 (or 33%) should be affordable.
R33	Site of former Earl of Leicester Public House, 238 Dereham Road	This site is allocated for residential development. This will accommodate in the region of 10 homes, of which at least 3 (or 33%) should be affordable.
R35	Land at Havers Road	This site is allocated for residential development. This will accommodate in the region of 80 homes, of which at least 26 (or 33%) should be affordable.
R36	Mile Cross Depot	This site is allocated for mixed use development with residential and associated community uses. This will accommodate a minimum of 170 homes, of which at least 56 (or 33%) should be affordable.
R37	The Norwich Community Hospital site, Bowthorpe Road	This site is allocated for hospital development and ancillary activities, plus associated supported living, care and key worker accommodation, and residential development. This will accommodate a minimum of 80 homes, or equivalent, including 26 (or 33%) units of affordable housing.
R38	Three Score, Bowthorpe	This site is allocated for an urban extension including housing, open and play space and associated infrastructure. This will accommodate in the region of 900 homes to provide affordable housing in accordance with policy 5, subject to viability considerations.

Policy Name	Site Name	Policy Description
R42	Land West of Bluebell Road and north of Daiy Hill/Coralie Court, Westfield View	This site is allocated for residential development for older people (over 55s). This will accommodate up to 60 homes and/or elderly care accommodation planned as an extension to the existing development, to provide affordable housing contribution in accordance with policy 5, subject to viability considerations.

Report to	Sustainable Development Panel	**Item**
	15 January 2020	5
Report of	Director of place	
Subject	Retail Monitor 2019	

Purpose

To report the findings of the 2019 Norwich Retail Monitor.

The Retail Monitor is the council's monitoring report advising of vacancy rates and changes of shop type across the city. Monitoring ensures that the council can measure the implementation of policies on retail monitoring and consider whether to implement them in a more flexible manner or to take an alternative approach taking into consideration market demands and trends.

Recommendation

To note the findings of the 2019 Retail Monitor.

Corporate and service priorities

The report helps to meet the corporate priority "A prosperous and vibrant city" and the service plan priority to implement the local plan for the city.

Financial implications:

No direct financial implications arising from this report

Wards: All wards

Cabinet member: Councillor Stonard – Sustainable and inclusive growth

Contact officer(s)

Joy Brown, Senior planner (policy), 01603 212543

Background documents

None

Report

Introduction

1. This report presents the findings of the 2019 Retail Monitor.
2. The Retail Monitor is the council's monitoring report advising of vacancy rates and changes of shop type in the city. Annual monitoring ensures that the council can assess the implementation of its retail policies and gauge their effectiveness.
3. The monitor is based on a survey of the city's retail offer carried out between July 2019 and October 2019. This report updates members from the last monitor produced in June 2018.
4. A revised edition of The National Planning Policy Framework (NPPF) was published in February 2019 (NPPF 2019). It states in paragraph 85 that planning policies and decisions should "support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation". "Planning policies should define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters."
5. The revised NPPF no longer has the requirement for definition of primary and secondary frontages.
6. The Joint Core Strategy (JCS) was adopted in March 2011, with amendments adopted in January 2014 by the three local planning authorities in the Greater Norwich Development Partnership (GNDP). The plan covers the period from 2008 to 2026.
7. Policy 11 of the JCS for Norwich city centre states that its regional centre role will be strengthened and that the retail, cultural and leisure facilities offered in the city will be expanded and enhanced through intensification of retail uses in the primary retail area and its expansion if necessary. The policy also promotes the strengthening of specialist shopping areas in secondary areas of the city centre.
8. Policy 19 promotes the strengthening of the large district centres (LDCs) at Anglia Square/Magdalen Street/St. Augustine's and at Riverside, which are at the second level of the retail hierarchy headed by the city centre. The essential role of district and local centres in meeting everyday shopping needs is also supported.
9. The Development Management Policies Local Plan adopted in December 2014 (the DM plan) provides the detail to enable the strategic aims above to be implemented and to protect the vitality and viability of centres. This is done through policies DM20 and DM21 which apply specific thresholds for retail uses in each retail area of the city.
10. These policies are also supported by the Main Town Centre Uses and Retail Frontages Supplementary Planning Document which was adopted concurrently with the plan.
11. An updated retail study to assess Norwich's current retail needs was produced in December 2017 by GVA to inform the Council's response to these issues in

emerging Greater Norwich Local Plan (GNLP). This advocates continued support and growth of the comparison goods retail offering, commercial leisure and other ‘main town centre uses’ in Norwich City centre, including growth in retail floor area in the city.

Main findings of the 2019 Retail Monitor

12. The Norwich City Centre Shopping Floorspace Monitor and Local and District Centres Monitor (October 2019) is attached as Appendix 1. The main findings of the monitor are that:

  a) Vacant available floorspace in the city centre as a whole is 5.5% which is a reduction from the 2018 figure of 7.3%. This is significantly better than the worst figure in the plan period of 12.4% in 2010; but is still slightly higher than the lowest figure of 4.2% which was experienced in 2014. City centre retail vacancy rates ‘as a proportion of all retail floorspace’ have also reduced from 11.3% in June 2018 to 10.0% in October 2019.

  b) The percentage of vacant *units* in the city centre has also decreased from 10.8% to 10.1% and continues to compare favourably to the average GB retail vacancy rate of 13.0% in June 2019 (Local Data Company, September 2019).

  c) Overall the amount of retail floorspace in the city centre has decreased significantly since the last survey. Previously we have seen decreases of around 0.1% (between June 2016 and June 2018) however between June 2018 and October 2019 the overall retail floorspace has reduced by 6,231 sqm which is a 2.8% decrease. This has largely been attributed to the change of use of a number of retail units within Castle Quarter (formerly Castle Mall) to leisure uses.

  d) Most of the primary area retail frontage zones are performing reasonably well in terms of their retail function with all of them being within their recommended minimum percentage rate of A1 retail. Three of the seven monitored frontages have seen an increase in the proportion of shops in the retail frontage since 2018, although there has been a reduction in retail in 3 frontage areas including Castle Quarter where the percentage of retail frontage has reduced from 95.6% in 2018 to 85.2% in 2019. Vacancy rates in Castle Quarter are still high but have reduced from 26% to 18% during the monitoring period.

  e) Retail vacancies have continued to increase in the secondary retail areas since 2018 and in terms of available floorspace are now 18.3%. There was a dramatic rise from 2.8% in 2016 to 17.7% in 2018 primarily due to the closure of Toys R Us in Cathedral Business Park which had a significant floor area for a single retailer and continues to remain vacant. Vacancy rates ‘*as a proportion of all retail units’* are however lower in the secondary area than any other area within the city.

  f) In the Large District Centres, vacancy rates have fallen for the first time since their designation in 2013. The vacant available floorspace is now 3.3% which is regarded as a low figure for shopping’s areas which do not form a central part of the city’s retail offer.

  g) In the rest of the city centre (streets outside the defined areas), vacant available floorspace has decreased significantly from 12% in 2018 to 5.9% in

2019. The rest of the city centre retail vacancy rates 'as a proportion of all retail floorspace' have also decreased significantly from 15% to 6.4% over the same period.

h) Vacancy rates in the ten existing district centres have decreased on average to 9.7% from 11.7% in 2018. Vacancy rates in the 28 local centres have increased to 7.1% from 6.5% in 2018, however this is still lower than it was in 2016 where 7.5% of units were unoccupied. Vacancy rates vary considerably within each of the district and local centres but overall the centres continue to be relatively robust and to offer an appropriate range of local services and facilities, with food stores being most important to their success.

13. The 2018 retail monitor suggested that Norwich was experiencing a number of challenges in terms of vacancy levels, but the picture has been more positive over the past 12 months or so with vacancy rates decreasing in the city centre as a whole. Vacancy rates in particular have fallen in the Large District Centres and the rest of the city centre and although the number of vacant units within the primary retail area have increased, there has been a reduction in available vacant floorspace. The secondary area has seen slight increases in vacant floorspace. Local and district centres have also performed well during the monitoring period and although vacancy rates have increased in local centres they are still lower than they were in 2016.

14. Over the past 12 months there has however been a significant reduction in the amount of retail floorspace within the city centre with retail floorspace decreasing by 6,231 sqm (2.8%). This decrease is greater than the last 10 years combined. The significant reduction in retail floorspace can largely be attributed to the diversification of the recently rebranded Castle Quarter (formally Castle Mall) where there has been the opening of a number of leisure uses which now occupy some of the larger units which were previously retail.

15. Although this runs counter to the aims of JCS policy 11 (to increase the amount of retailing in the city centre), it can be regarded as in support of the policy's aim to increase other uses such as the early evening economy, employment and cultural and visitor functions to enhance vitality and viability. This has ultimately prevented a substantial increase in vacancy rates. It also conforms to paragraph 85 of the NPPF which allows for diversification in order to respond to changes in the retail and leisure industries and the Grimsey Review which considers that an appropriate diversity of other town centre uses such as restaurants, cafes and leisure uses can help support the economic vitality and health of the city centre.

16. Overall the 2019 monitoring figures suggest that the retail performance across the city remains relatively robust and competitive and the results for the city centre as a whole present a fairly positive picture. Over the past few years the city has seen a trend of rising vacancies and nationally there has also been an increase in vacancy rates, so a reduction in vacancy rates has bucked the trend. It will be interesting to see whether a reduction in vacancy rates is a one off or whether vacancy rates will stabilise at this relatively low level or even continue to decrease further.

17. It is also too soon to see how successful the new leisure uses will be within the Castle Quarter and to see what impact this has upon footfall and ultimately the

success of this recently rebranded shopping centre. At this stage, it does suggest that, although certain sectors are declining, diversification into the leisure sector has prevented a number of particularly large units sitting empty and diversification into the leisure industry is a trend, which is being experienced nationally. These are all changes which need to be monitored closely to inform emerging policies and guidance and also to inform future decision making at the planning application stage.

18. Over recent years, the government has made a substantial number of changes to permitted development rights, many of which affect A1 retail space. As such, smaller A1 retail units can change to other uses (such as professional and financial services, residential, leisure, restaurants and schools) on a permanent or temporary basis with either no planning permission or prior approval only. Shopping areas are therefore at risk of losing smaller retail units with the council having little or no control over these losses. The impact of these changes will need to be continued to be reviewed in future monitors. There have not been significant prior approval notifications since the last survey was carried out to cause concern at this time.

19. The retail sector, both nationally and within Norwich, has experienced many challenges in recent years brought about by changing consumer behaviour driven by technology and prevailing economic conditions. These challenges will have ongoing impacts for the viability of some retail businesses. It is therefore important that the council investigates other possible ways to cultivate and support the retail offer of Norwich, involving working in partnership with relevant organisations including Norwich BID.

Appendix

Norwich City Centre Shopping Floorspace Monitor & Local & District Centres Monitor

Survey at October 2019

Contents

Introduction

Policy Context

1. The National Planning Policy Framework 2019 (NPPF 2019) was published in February 2019. It states in paragraph 85 that planning policies and decisions should "support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation". "Planning policies should define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters." The revised NPPF no longer has the requirement for definition of primary and secondary frontages.
2. The Joint Core Strategy (JCS) was adopted in March 2011, with amendments adopted in January 2014 by the three local planning authorities in the Greater Norwich Development Partnership (GNDP)[1], since superseded by the Greater Norwich Growth Board (GNGB). The plan covers the period from 2008 to 2026.
3. Policy 11 of the JCS for Norwich city centre states that its regional centre role will be strengthened and that the retail, cultural and leisure facilities offered in the city will be expanded and enhanced through intensification of retail uses in the primary retail area and its expansion if necessary. The policy also promotes the strengthening of specialist shopping areas in secondary areas of the city centre.
4. Policy 19 of the JCS promotes the strengthening of the large district centres (LDCs) at Anglia Square, Magdalen Street & St Augustine's and at Riverside, which are at the second level of the retail hierarchy headed by the city centre. The essential role of district and local centres in meeting everyday shopping needs is also supported.
5. The adopted Development management policies local plan (the DM plan) provides the detail to enable the strategic policies above to be implemented and to protect the vitality and viability of centres. In particular, policies DM20 and DM21 aim to protect retail function by managing the proportion of shops - as opposed to other services and facilities - in defined city centre shopping frontages (policy DM20) and suburban shopping areas (policy DM21). In both cases local policies seek to ensure that proposals for change of use will not result in the proportion of shops falling below a specified minimum level.
6. For the city centre retail frontages the applicable minimum thresholds for policy DM20 are set out in a separate supplementary planning document (the Main town centre uses and retail frontages SPD, adopted in December 2014). For district and local centres the thresholds are set out in policy DM21.
7. The government has incrementally increased permitted development rights and as such there is now the flexibility to change shops to a variety of different uses without the need for planning permission – both on a temporary basis through

[1] The GNDP is made up of Broadland District Council, Norwich City Council and South Norfolk Council, working in partnership with Norfolk County Council and the Broads Authority

the prior notification procedure, and permanently. The removal of the need for planning permission for change of use from A1 retail to A2 professional services (i.e. banks) and vice versa may have an impact through largely uncontrolled changes between shops, banks and other financial/professional services. These measures are undoubtedly helpful to encourage new uses into underperforming centres but they also make it increasingly difficult for local planning policy to influence directly the mix of uses in a centre, or prevent the incremental loss of shops in comparatively prosperous city centres such as Norwich where it is important to retain them. The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 2) Order 2017 extended protection of A4 drinking establishments by removing permitted development rights for their change of use.

8. The latest version of the NPPF (2019) recognises the changing face of the high street and the need to take a different approach to retail planning policy in order to reinvigorate and adapt the offering focused in primary centres/core areas to successfully prepare for future; this includes suitable provision of leisure uses and housing within town centres.

9. This document presents the results of the most recent survey of the city centre and district and local shopping centres which were undertaken between July and October 2019. This monitoring data is used both to assess the performance of policies and to assist their implementation.

Retailing in Norwich

10. Norwich city centre continues to be considered a thriving retail and visitor destination in terms of retail spend and attractiveness and has maintained its position as 13th in the 'Top Shopping Venues' Retail Rankings nationally (source: Javelin group Venuescore 2017[2]). The city centre is the most accessible and sustainable location in the greater Norwich area for retail, leisure, office, cultural and tourism related development.

11. Retail uses have generally been considered critical in underpinning the city centre's continued vitality and viability, however, as discussed in the Grimsey Review 2[3] "dramatic structural changes to the retail industry have occurred over the last five years, brought about by the convergence of changing consumer behaviour driven by technology, an archaic business rates system and prevailing economic conditions". This independently commissioned report, produced in response to 2011's Government Commissioned Portas Review, considers that an appropriate diversity of other town centre uses such as restaurants, cafés, financial services, leisure, cultural uses and offices can help to support the economic vitality and health of the city centre for the community and visitors throughout the day and evening. It states: "The number of and type of shops being occupied in our towns has continued to change and at a quicker rate. The fundamental structure of Britain's town centres has changed from goods transaction to one of consumption of food and experiential services including health and beauty".

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[2] Venuescore 2017, 'UK Shopping Venue Rankings (2017)'
[3] Grimsey Review 2 'It's time to re-shape our town centres' (2018)

12. Regular monitoring of change in retail frontages ensures that any thresholds applied remain relevant and necessary. The survey data reported here was collected between July and October 2019. The data reported is based on the frontages as defined in appendix 4 of the Development Management Policies Plan.

Main Findings

City Centre Overview

13. The retail monitor survey measures vacancy rates in three different ways: a: Retail vacancy rate (Use Class A1) as a proportion of retail floorspace, excluding space being built or refitted.

    b: Retail vacancy rate (Use Class A1) as a proportion of retail floorspace.

    c: Retail vacancy rate (Use Class A1) as a proportion of retail units.

14. The vacant available *floorspace* in the city centre as a whole is 5.5% which is a reduction from 2018's figure of 7.3%. This is significantly better than the worst figure in the plan period of 12.4% in 2010; but is still slightly higher than the lowest figure of 4.2% which was experienced in 2014.

15. City centre retail vacancy rates 'as a proportion of all retail floorspace' have also reduced from 11.3% in June 2018 to 10.0% in October 2019. This is a reduction of 1.3% from the last survey although it is still higher than vacancy rates experienced since the start of the plan period in 2014. This figure does however still include 4.5% of floorspace that is currently under construction/refurbishment so it is hoped that this shall be occupied in the near future, especially with the occupation of the new Primark Store on Haymarket in December 2019.

16. The percentage of vacant *units* has also decreased from 10.8% to 10.1% and continues to compare favourably to the average GB retail vacancy rate of 13.0% in June 2019 (Local Data Company, September 2019[4]) which equated to a +0.6% rise year-on-year. However, direct comparison with national rates is difficult due to methodological differences between surveys.

17. Overall the amount of retail floorspace in the city centre has decreased significantly since the last survey. Previously we have seen decreases of around 0.1% (between June 2016 and June 2018) however between June 2018 and October 2019 the overall retail floorspace has reduced by 6,231 sqm which is a 2.8% decrease. This has largely been attributed to the change of use of a number of retail units within Castle Quarter (formerly Castle Mall) to leisure uses.

18. The reduction in A1 retail units is however less than during the last monitoring period with there being a reduction of 21 units compared to 31 units previously. This would suggest that previously there was a change away from A1 in a greater number of smaller units whereas in the past 12 months or so the change is likely attributed to some of the larger units being occupied by different uses.

19. In terms of refurbishment, the most significant retail development currently underway within the city centre is the ongoing refurbishment and extension to Primark on Haymarket/White Lion Street, which constitutes a net increase of floorspace for the store of 1805m². This is due to be completed in December 2019. At the time of the survey New Look in Castle Quarter was also closed for

[4] Local Data Company, "GB Retail and Leisure Market Analysis, H1 2019 Update" (2019)

refurbishment. This unit is 1,088m² but it is understood that it has now since reopened.

20. Recent years have seen an increased diversification of uses within the city centre with a particular increase in the number of cafes and restaurants on offer, along with other ‘service’ type uses such as tattoo studios and beauty salons. However over the past 16 months there has also been a significant growth in leisure uses with, for example, the opening of a bowling alley, soft play, gym and retro gaming centre within the Castle Quarter.

21. This is a trend that has been experienced nationally. The GB Retail and Leisure Market Analysis H1 2019 Update (published September 2019 by the Local Data Company[5]) has set out that independent leisure and service retail categories especially saw growth and the health and beauty sector continues to thrive with the growth categories being dominated by leisure uses.

22. Since the last survey was carried out, some large national chains have been lost from the city centre including Poundworld, Card Market, French Connection and Bang and Olufsen. There have also been a number of chain restaurants that have closed including Jamie’s Italian and Carluccios as well as the loss of Norwich and Peterborough Building Society. Some large chain stores such as Rymans have reduced the number of stores that they have in Norwich but have kept a presence. There are also a number of stores which nationally have rationalised but have retained their presence in central Norwich which include New Look, Marks and Spencer and House of Fraser. This is a positive sign for the health and attractiveness of Norwich City.

23. There has been a 5.1% decrease in retail floorspace since 2008 and 2.8% of this was in the past monitoring period. Although this runs counter to the aims of JCS policy 11 (to increase the amount of retailing in the city centre), it can be regarded as in support of the policy’s aim to increase other uses such as the early evening economy, employment and cultural and visitor functions to enhance vitality and viability and has ultimately prevented a substantial increase in vacancy rates. It also conforms to paragraph 85 of the NPPF which allows for diversification in order to respond to changes in the retail and leisure industries, and the Grimsey Review which considers that an appropriate diversity of other town centre uses such as restaurants, cafes and leisure uses can help support the economic vitality and health of the city centre.

24. As part of the Transport for Norwich Strategy, the city centre has undergone some major traffic changes over the past few years with a number of streets being closed to general traffic, being made one-way or being pedestrianised. This increases the attractiveness of the city to shoppers, particularly on streets such as Westlegate which were, until recently, difficult for pedestrians to navigate. A number of public realm improvements have been completed over the past couple of years including Westlegate and Golden Ball Street, which improve pedestrian access to the Ber Street and All Saints Green areas, and by making changes to the one way system it is now easier to access Norwich’s car parks. Changes to Rose Lane and Prince of Wales Road also seek to

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[5] Local Data Company, “GB Retail and Leisure Market Analysis, H1 2019 Update” (2019)

improve traffic flow to make it easier to access Castle Quarter car park, which in turn will support Norwich's retail and leisure centre. Other initiatives to make the city centre accessible to all include the Coach Strategy[6], which has now resulted in a coach drop off on Castle Meadow for day trippers and service enhancements for the Park and Ride. This includes a Sunday service from Thickthorn and more services into the evening. A new bike sharing scheme (Beryl bikes) will also be introduced in Spring 2020.

25. The level of floorspace growth promoted by JCS policy 11 was based on assumptions in a 2007 study and the retail market has changed radically since then. A 5.1% loss in retail floorspace is nevertheless considered favourable against the national picture.

26. An updated retail study to assess Norwich's current '*retail needs*' to inform retail policy in the emerging Greater Norwich Local Plan (GNLP) was produced in December 2017 by GVA[7]. This advocates continued support and growth of the comparison goods retail offering, commercial, leisure and other 'main town centre uses' in Norwich City centre. The report recommends a need for an additional 11,000m² - 15,000m² comparison retail floor space to 2027. Further to the above, the report also supports continued improvement to the public realm in Norwich, following recent success of completed improvements. The report considers this approach appropriate to support and enhance its role as a centre of regional-scale shopping and leisure significance. The contents of GVA report will be reviewed by the GNLP team.

27. Recent figures from the Norwich Business Improvement District (BID[8]) indicate that the shopping centre is experiencing a decline in footfall; down 2.1% on the previous year. Footfall has declined on all days of the week with the biggest decline being on a Sunday. Fridays and Saturday have experienced the least amount of decline and Saturdays remain the most popular day for shopping.

28. **Summary:** The results of the survey for the City centre as a whole present a fairly positive picture with there being a reduction in both vacant available floor space and percentage of vacant units. Nationally there has been an increase in vacancy rates. There has been a significant reduction in retail floor space in the city centre which can be attributed to the change of use of a number of larger units from retail to leisure uses and this has been particularly apparent within the Castle Quarter (formally Castle Mall). The Norwich city centre retail offering appears to be fairly robust in the current climate although there has been a reduced footfall throughout the week. Consideration needs to be given to what the survey is telling us about the long-term health of retailing in Norwich in the context of the challenges facing the British High Street/Town Centre retail sector.

29. Table 1, provides city centre overview data on retail floorspace, enabling comparison over the time period of the plan.

[6] https://www.norwich.gov.uk/coaches
[7] GVA, "Greater Norwich Employment, Town Centre and Retail Study" (2007)
[8] Norwich Business Improvement District "Footfall Report for: Norwich" (October 2019)

Table 1: Norwich city centre – provision of A1 retail floorspace

Retail floorspace (use class A1)				
	All	**Trading**	**Vacant**	**Under construction/ refurbishment**
October 2019	**217,539**	**195,891**	**11,992**	**9,656**
June 2018	223,770	198,519	16,265	8,986
June 2016	223,987	208,342	13,006	2,639
Sept 2015	223,762	210,509	11,028	2,225
April 2014	224,653	213,652	9,513	1,488
August 2013	224,109	208,779	11,849	3,481
January 2011	227,377	203,948	21,035	2,394
July 2010	227,949	198,379	28,315	1,255
January 2010	228,432	206,379	21,810	243
July 2009	229,509	208,674	20,579	256
July 2008	229,120	213,902	14.248	970

Retail units (use class A1)				
	All	**Trading**	**Vacant**	**Under construction/ refurbishment**
October 2019	**971**	**873**	**88**	**10**
June 2018	992	885	98	9
June 2016	1023	906	110	7
Sept 2015	1020	908	103	10
April 2014	1048	930	107	11
August 2013	1054	936	97	21
January 2011	1067	949	108	10
July 2010	1070	938	121	11
January 2010	1079	948	126	5
July 2009	1086	955	128	3
July 2008	1084	967	109	8

Retail vacancy rate (use class A1)			
	As a proportion of all retail floorspace $\frac{Vacant+Refurbishment}{All}$	**As a proportion of retail floorspace excluding space being built or refitted** $\frac{Vacant}{All}$	**As a proportion of all retail units** $\frac{Vacant+Refurbishment}{All}$
October 2019	**10.0%**	**5.5%**	**10.1%**
June 2018	11.3%	7.3%	10.8%
June 2016	7.0%	5.8%	11.4%
Sept 2015	5.9%	4.9%	11.1%
April 2014	4.9%	4.2%	11.3%
August 2013	6.8%	5.3%	11.2%
January 2011	10.3%	9.3%	10.1%
July 2010	13.0%	12.4%	11.3%
January 2010	9.7%	9.5%	11.7%
July 2009	9.1%	9.0%	11.8%
July 2008	6.2%	6.2%	10.0%

Overall retail floorspace change	
Since June 2018	**Decreased by 6,231 sqm (2.8% decrease)**
Since July 2008	**Decreased by 11,581 sqm (5.1% decrease)**

The Primary Area: Retail Vacancy

30. The extent of the primary area, containing the malls and main comparison goods stores, is shown on Map 1. The boundaries have been amended slightly over time to reflect changes, so direct comparison with previous years is not always possible.

31. The vacant available *floorspace* rate is 4.1% in the primary retail area. This is a significant decrease in percentage of vacant floorspace from the peak vacancy rate of 11.7% in 2010, as well as a considerable decrease from 2018's figure of 5.3%.

32. Primary Area retail vacancy rates 'as a proportion of all retail floorspace' has remained at 10.5%. The large disparity between vacant + refurbishment (10.5%) and vacant (4.1%) can be attributed to the large scale redevelopment and extension to Primark which has a proposed floor area of 7,735m² and the refurbishment of New Look within the Castle Quarter which has a floor area of 1,088 m². The new Primark store is due to open on 11th December 2019 so within the next survey this will be occupied. However, the temporary store on St Stephen's Street which is 3,145 m² will be vacated by Primark and at this stage it is not known whether this will have new tenants. New Look within Castle Quarter has reopened since the survey data were collected.

33. The percentage of vacant retail *units* in the Primary Area has increased to 11.1% in 2019, up from 9.8% in 2018 but this is still considerably less than 2015's figure of 14.1% which was the highest figure in the plan period. As in recent years, this figure being higher than the floorspace vacancy figure implies that smaller shops remain more difficult to let in the primary area. This may therefore be an issue related to rental values or the viability of small businesses in general.

34. The overall amount of floorspace in A1 retail use has decreased by 5,461m², and reduced by 7 units in the Primary Area since 2018. Between 2014 and 2018 the amount of retail floorspace has remained relatively constant (a reduction of 329 m²) and therefore the reduction of 5,461 m² within a single year is significant.

35. The main reason for the reduction in retail floorspace is that a considerable number of units within the Castle Quarter have now changed use from A1 to other uses including a bowling alley and soft play (1,864 m²), retro gaming centre (752 m²), ping pong centre (194 m²), honesty library (159 m²), music lounge (128 m²), Kastle Kids (198 m²) and gym (1,880 m²). Some of the changes have taken place on a permanent basis whereas some other units are being used on a much more informal, temporary arrangement.

36. Within the last monitoring report (June 2018) it was reported that the comprehensive refurbishment of the Castle Mall had not been overly successful with the uptake of the refurbished units being slow and that there was a vacancy rate of 26%. Although the vacancy rate in Castle Quarter is still high at around 18% there has been a significant drop in vacancies which is attributed to the change of uses described above. Long term vacancies in Castle Quarter is still of concern and it is too soon to see how successful the leisure uses are that have recently occupied the Castle Quarter but this does show that although certain sectors are declining, diversification into the leisure sector has prevented a number of particularly large units sitting empty.

37. Chapelfield on the whole remains well occupied with 7 vacant units out of a total of 82 (8.5%) which is the same number as in 2018.

38. The Royal Arcade has experienced a significant change over the past year with half of the units now being vacant (8 out of 16 units). This includes the closure of Jamie's Italian. However, reports within the local press would suggest that Sonkai jewellers is due to relocate there from their current location on Dove Street. There are also plans to amalgamate three empty units to create a new restaurant. The restaurant is to be occupied by the winner of a competition and they will be given the space rent free for a period of time. It is understood that high rents in addition to an annual service charge and business rates have been partially responsible for the high vacancies in the Arcade.

39. Changes to permitted development rights at a national level are intended to encourage a wider range of uses in smaller shops. It is difficult to monitor changes that have taken place due to permitted development rights as the Local Planning Authority only needs to be notified of some changes of use. Since the last survey was carried out, the Council has been notified of six proposed changes in the City as a whole but not all of these have been implemented. Only two of six changes are within the primary retail area – one three year temporary change of use and one permanent prior approval. The other proposed changes are within the District and Local Centres.

40. **Summary:** In terms of vacant floorspace the primary area has performed well as an overall group since the last survey although there are areas such as the Royal Arcade which have experienced the loss of a number of shops/restaurants over the past year. The Castle Mall has been rebranded as Castle Quarter and vacant floorspace has dropped significantly following the opening of a number of leisure uses including a new bowling alley, soft play, gym and retro gaming arcade. This has however resulted in a significant loss of retail floorspace in the area. It is too soon to see how successful these new leisure uses will be in revitalising the shopping centre but the diversification has prevented a number of large units sitting empty and the increase of leisure and other services uses is a trend which is being experienced nationally.

41. Table 2, below, provides retail floorspace data for the primary area.

Table 2: Primary shopping area

Retail floorspace (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2019	**150,094**	**134,405**	**6,148**	**9,541**
June 2018	155,555	139,261	8,265	8,029
June 2016	155,389	143,867	8,883	2,639
Sept 2015	155,139	145,445	7,711	2,017
April 2014	155,884	149,059	5,865	960
August 2013	152,497	141,705	9,382	1,410
January 2011	173,789	157,817	13,967	2,005
July 2010	174,252	153,199	20,448	605
January 2010	174,525	160,541	13,909	75
July 2009	175,256	162,962	12,294	0
July 2008	175,028	168,511	6,434	83

Retail units (use class A1)

	All	Trading	Vacant	Under construction/ refurbishment
October 2019	**523**	**465**	**50**	**8**
June 2018	530	479	48	3
June 2016	562	484	72	7
Sept 2015	559	481	72	7
April 2014	579	499	74	6
August 2013	567	490	72	5
January 2011	574	524	45	5
July 2010	576	513	58	5
January 2010	578	524	53	1
July 2009	581	524	57	0
July 2008	584	537	46	1

Retail vacancy rate (use class A1)

	As a proportion of all retail floorspace $\frac{Vacant+Refurbishment}{All}$	As a proportion of retail floorspace excluding space being built or refitted $\frac{Vacant}{All}$	As a proportion of all retail units $\frac{Vacant+Refurbishment}{All}$
October 2019	**10.5%**	**4.1%**	**11.1%**
June 2018	10.5%	5.3%	9.8%
June 2016	7.4%	5.7%	14.0%
Sept 2015	6.3%	5.0%	14.1%
April 2014	4.4%	3.8%	13.8%
August 2013	7.1%	6.2%	13.6%
January 2011	9.2%	8.0%	7.8%
July 2010	12.1%	11.7%	10.1%
January 2010	8.0%	8.0%	9.2%
July 2009	7.0%	7.0%	9.8%
July 2008	3.7%	3.7%	7.9%

The Primary Area: Retail Frontages

43. Policy DM20 divides the primary area into a number of smaller 'frontage zones' (as defined on the policies map and as identified in appendix 4 to the DM policies plan). The frontage zones are shown on Map 2. The retail threshold applicable in each of these areas is set within the Main Town Centre Uses and Retail Frontages Supplementary Planning Document (December 2014).

44. Table 3 provides data on the percentage of retail uses in the primary area retail frontage zones in October 2019. None of the frontages have dropped below their minimum thresholds as set out in the Main Town Centre Uses and Retail Frontages Supplementary Planning Document (December 2014). Overall, the retail frontages appear relatively healthy but the most significant change has been the increase in non-retail frontage in frontage zone PC02: Castle Quarter from 38.3m (4.4%) in June 2018 to 129.9m (14.8%) in October 2019. This is due to the increase in leisure uses such as a bowling alley, soft play, gym and retro gaming centre which although has resulted in a reduction in retail has prevented a number of larger units standing empty. During the same period, the vacancy rate reduced from 26% in 2018 to 18% in 2019 in the Castle Quarter.

45. There has however been a slight increase in the percentage of A1 retail frontage in three frontage zones (PC01: Gentleman's Walk/Haymarket/Brigg Street, PR01: Back of the Inns/Castle Street area and PR03: St Stephens Street/Westlegate) which is a reversal from the previous year where the retail frontage decreased in all defined frontages except the Castle Quarter which remained at a constant level. This would suggest that in the past year there has been fewer changes away from retail to service and leisure uses (with the exception of Castle Quarter, PR02: The Lanes east and PR06: Timberhill/Red Lion Street) and some non-retail units have actually changed back to retail.

46. Overall, whilst the percentage of A1 retail frontage within some primary retail area core frontage zones has declined, in other areas it has increased and overall retail frontages still remain at relatively comfortable levels above their minimum thresholds.

Table 3: Primary Area Retail Frontage Zones - Retail frontages in October 2019

Frontage zone	Total frontage (m)	Total non-retail frontage Oct 2019	% A1 retail Oct 2019 (frontage)	% A1 retail June 2018 (frontage)	Minimum threshold (from 2014 SPD)
Primary retail area core frontage zones					
PC01: Gentleman's Walk/ Haymarket/Brigg Street	903.7	101.6	**88.8%**	87.3%	80%
PC02: Castle Mall (Levels 1 & 2)	875.1	129.9	**85.2%**	95.6%	80%
PC03: Chapelfield, upper & lower Merchants Hall and St Stephens Arcade	675.0	19.5	**97.1%**	97.1%	80%
Frontage zones in the rest of the primary retail area					
PR01: Back of the Inns/Castle Street area	710.6	215.2	**69.7%**	69.0%	65%
PR02: The Lanes east (Bedford Street/Bridewell Alley)	1094.7	313.2	**71.4%**	72.2%	70%
PR03: St Stephens Street/Westlegate	800.4	127.6	**84.1%**	83.7%	80%
PR04: Castle Meadow north		N/A[9]			
PR05: Chapelfield Plain		N/A[10]			
PR06: Timberhill/Red Lion Street	434.2	147.8	**66.0%**	67.7%	60%

Key:
Green denotes increase in A1 retail since 2018
Red denotes decrease in A1 retail since 2018.
Blue denotes frontage is within minimum A1 threshold.
Orange denotes minimum A1 frontage threshold has been breached.

[9] There is no defined frontage in this zone
[10] There is no defined frontage in this zone

The Secondary Area

47. Map 3 shows the extent of the secondary area.

48. The vacant available *floorspace* rate experienced a significant increase between 2016 and 2018 when it rose from 2.8% to 17.2%. Between 2018 and 2019 vacancy rates have remained high with a slight further increase to 18.3%.

49. The percentage of vacant retail *units* in the Secondary Area also increased between 2016 and 2018 with a rise from 7.0% to 7.7%. Between 2018 and 2019 there has been no change in the percentage of vacant retail units.

50. The overall amount of floorspace in A1 retail use has marginally decreased (by 161m²) with a reduction of 1 unit in the Secondary Shopping areas since the last survey in 2018.

51. The high vacancy rate in the secondary retail area is of some concern as the figure is at the highest level in this area since monitoring commenced in 2008. However the high floorspace vacancy rate can be attributed to the closure and subsequent vacancy of Toys R Us in Cathedral Retail Park which has an individual floor area of 3,222m². If this unit was omitted from both the vacant floorspace and total floorspace, the vacancy rate within the secondary retail area would only be 4.0% which is well below the national average and one of the lowest in the city centre. Furthermore vacancy rates '*as a proportion of all retail units'* are lower in the secondary area than any other area within the city.

52. The secondary area includes some streets which provide a specialist mix of shops and have adapted more rapidly and remained resilient to the economic downturn. For instance, Upper St Giles Street has retained an interesting mix of independent shops, bakeries, art galleries, restaurants, hairdressers and residential properties and in October 2019 all units were occupied.

53. The Retail and Leisure Topic Paper (2013) identified that "other shopping areas within the city centre should be strengthened to provide for retail diversity, with a particular focus on enhancing the character of specialist retailing areas and markets".

Table 4: Secondary Shopping

Retail floorspace (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
October 2019	**21,611**	**17,651**	**3,960**	**0**
June 2018	21,772	17,921	3,741	110
June 2016	21,858	21,243	615	0
Sept 2015	21,793	21,148	594	51
April 2014	21,958	21,569	273	116
August 2013	21,926	21,083	715	131
January 2011	17,785	16,612	878	295
July 2010	17,980	16,709	1,107	164
January 2010	18,076	16,788	1,189	99
July 2009	18,262	17,008	1,207	47
July 2008	18,167	17,604	1,022	81

Retail units (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
October 2019	**181**	**167**	**14**	**0**
June 2018	182	168	12	2
June 2016	185	172	13	0
Sept 2015	184	173	10	1
April 2014	185	177	5	3
August 2013	187	176	9	2
January 2011	190	174	13	3
July 2010	192	173	16	3
January 2010	194	173	18	3
July 2009	196	173	22	1
July 2008	194	176	15	3

Retail vacancy rate (use class A1)			
	As a proportion of all retail floorspace $\frac{Vacant+Refurbishment}{All}$	As a proportion of retail floorspace excluding space being built or refitted $\frac{Vacant}{All}$	As a proportion of all retail units $\frac{Vacant+Refurbishment}{All}$
October 2019	**18.3%**	**18.3%**	**7.7%**
June 2018	17.7%	17.2%	7.7%
June 2016	2.8%	2.8%	7.0%
Sept 2015	3.0%	2.7%	6.0%
April 2014	1.8%	1.2%	4.3%
August 2013	3.9%	3.3%	5.9%
January 2011	6.6%	4.9%	6.8%
January 2010	7.1%	6.6%	9.3%
July 2008	5.6%	5.7%	7.7%

Large District Centres

54. Direct comparison in changes over the plan period is difficult for the Large District Centres (LDCs) as there have been changes to the areas covered with the re-designation of Riverside. Retail floorspace at Riverside is included in these statistics from August 2013 onwards, following the removal of Riverside from the primary shopping area in the adopted JCS (March 2011) and its re-designation as a Large District Centre. Map 4 shows the extent of the LDCs.
55. The vacant available floorspace in the LDCs is 3.3% which is a decrease from 2016 and 2018's figures of 5.4%. Since the current designation of LDCs in 2013 there has been an upward trend in vacancy rates and this is the first time since then that vacancy rates have fallen. 3.3% is regarded as a low figure for shopping areas which do not form a central part of the city's retail offer. LDC retail vacancy rates 'as a proportion of all retail floorspace' have also decreased from 6.7% in 2018 to 3.5% in 2019.
56. The percentage of vacant retail *units* in the LDCs has decreased since 2018 (from 11.4% to 10.2%) but this is higher than it was in 2016, 2015 and 2014. The difference between vacant floorspace and vacant units would suggest that the larger units are faring well but that the smaller units are harder to find and retain retailers.
57. The overall amount of floorspace in A1 retail use has decreased by 445m² and there has been a decrease in 3 units in the LDCs since 2018.
58. Encouragingly, Riverside is fully let and relatively close to the city centre but shopping trips remain largely car-based. The routes to be established within the emerging 'St Anne's Quarter' development will provide new retail units and cafés creating a more attractive walking and cycling link between Riverside and the city centre.
59. The Magdalen Street, Anglia Square & St Augustine's LDC has a relatively low floorspace vacancy rate of 6.7% (down from 11.6% in 2018) which is very competitive when compared to the GB national average retail vacancy rate of 13.0% (GB Retail and Leisure Market Analysis H1 2019 Update, Local Data Company, published September 2019[11]). This centre has repositioned itself as a niche area of speciality/ethnic retailers and restaurants. This adheres to the recommendations within the Retail and Leisure Topic Paper (2013) which refers to "… specialist retail areas… in which the aim is to continue recent success by promoting smaller scale, independent retailers". The Magdalen Street and Anglia Square traders association (MATA) continues to operate in the area; however the annual Magdalen Street Celebration events have unfortunately been unable to run over the past few years, there are hopes that this may return in future years.
60. Anglia Square is subject to proposals for comprehensive re-development. A 10 year planning consent has been granted for the area underneath the flyover on Magdalen Street and the application for the redevelopment of Anglia Square itself will be determined by the Secretary of State in 2020 following a call in. If

[11] Local Data Company, "GB Retail and Leisure Market Analysis, H1 2019 Update" (2019)

permission is granted this area may be subject to significant levels of change and regeneration over the coming years.

Table 5: Large District Centres (Magdalen Street, St Augustine's Street, Anglia Square & Albion Way Riverside)

Retail floorspace (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
October 2019	**32,164**	**31,043**	**1,071**	**50**
June 2018	32,609	30,421	1,748	440
June 2016	32,353	30,534	1,750	69
Sept 2015	32,353	31,237	1,047	69
April 2014	32,647	31,594	784	269
August 2013	32,602	31,256	301	1,045
January 2011	18,314	14,934	3,311	69
July 2010	18,218	14,947	3,202	69
January 2010	18,239	14,811	3,359	69
July 2009	18,289	15,049	3,031	209
July 2008	18,139	15,017	3,031	91

Retail units (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
October 2019	**137**	**123**	**13**	**1**
June 2018	140	124	14	2
June 2016	139	125	13	1
Sept 2015	139	129	9	1
April 2014	140	130	8	2
August 2013	77	67	7	3
January 2011	135	107	27	1
July 2010	134	109	24	1
January 2010	135	106	28	1
July 2009	136	112	22	2
July 2008	135	111	22	2

Retail vacancy rate (use class A1)			
	As a proportion of all retail floorspace $\frac{Vacant+Refurbishment}{All}$	As a proportion of retail floorspace excluding space being built or refitted $\frac{Vacant}{All}$	As a proportion of all retail units $\frac{Vacant+Refurbishment}{All}$
October 2019	**3.5%**	**3.3%**	**10.2%**
June 2018	6.7%	5.4%	11.4%
June 2016	5.6%	5.4%	10.0%
Sept 2015	3.4%	3.2%	7.2%
April 2014	3.2%	2.4%	7.1%
August 2013	4.1%	1.0%	13%
January 2011	18.5%	18.1%	20.0%
July 2010	18.0%	17.6%	17.9%
January 2010	18.8%	18.4%	20.7%
July 2009	17.7%	16.6%	16.2%
July 2008	16.7%	16.8%	16.0%

Rest of the City Centre

61. This area covers all shops within the city centre which are not included in the defined areas discussed above. There have been some boundary changes which were first reflected in the 2014 monitor. As such, the figures prior to 2014 are not directly comparable with current figures.

62. The vacant available *floorspace* in the rest of the city centre has decreased significantly from 12% in 2018 to 5.9% in 2019. The rest of the city centre retail vacancy rates 'as a proportion of all retail floorspace' have also decreased significantly from 15% to 6.4% over the same period.

63. The percentage of vacant retail *units* in the rest of the city centre has more than halved from 25 units (18.5%) in 2018 to 12 units (9.2%) in 2019.

64. The overall amount of floorspace in A1 retail use has decreased by 164m², and reduced by 5 units in the 'rest of the city centre' since 2018.

65. These figures suggest that the larger units are faring well and although there has been a significant uptake in units over the monitoring period which has resulted in the lowest floorspace vacancy rates in this area since 2008 and lower than average vacancy rates for the city centre, some of the smaller units are still struggling to find and retain retailers in the lesser known shopping streets which lie outside of the defined areas.

Table 6: Rest of city centre

Retail floorspace (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
October 2019	**13,670**	**12,792**	**813**	**65**
June 2018	13,834	11,769	1,658	407
June 2016	14,387	12,629	1,758	0
Sept 2015	14,475	12,711	1,676	88
April 2014	14,164	11,430	2,591	143
August 2013	17,084	14,738	920	1,426
January 2011	17,400	14,495	2,880	25
July 2010	17,500	13,524	3,559	417
January 2010	17,593	14,240	3,353	0
July 2009	17,702	13,655	4,047	0
July 2008	17,786	13,310	3,761	765

Retail units (use class A1)				
	All	Trading	Vacant	Under construction/ refurbishment
October 2019	**130**	**118**	**11**	**1**
June 2018	135	110	23	2
June 2016	137	125	12	0
Sept 2015	138	125	12	1
April 2014	144	124	19	1
August 2013	157	137	12	8
January 2011	168	144	23	1
July 2010	192	167	23	2
January 2010	172	145	27	0
July 2009	173	146	27	0
July 2008	171	143	26	2

Retail vacancy rate (use class A1)			
	As a proportion of all retail floorspace $\frac{Vacant+Refurbishment}{All}$	As a proportion of retail floorspace excluding space being built or refitted $\frac{Vacant}{All}$	As a proportion of all retail units $\frac{Vacant+Refurbishment}{All}$
October 2019	**6.4%**	**5.9%**	**9.2%**
June 2018	15%	12%	18.5%
June 2016	12.2%	12.2%	8.8%
Sept 2015	12.2%	11.6%	9.4%
April 2014	19.3%	18.3%	13.9%
August 2013	13.7%	5.4%	12.7%
January 2011	16.7%	16.6%	13.7%
July 2010	22.7%	20.3%	12.0%
January 2010	19.1%	19.1%	15.7%
July 2009	22.9%	22.9%	15.6%
July 2008	21.1%	22%	15.2%

District and Local Centres

66. Policy DM21 of the Development management policies plan establishes A1 retail use thresholds of 60% for district centres and 50% for local centres.

67. Vacancy rates in district and local centres focus on units only and have decreased to 8.1% from 8.5% in 2018 which follows the overall trend of vacancy rates within the city and indicates that local and district centre vacancy rates are both at a fairly healthy level within Norwich.

District Centres

68. Vacancy rates in the district centres have decreased from 11.7% in 2018 to 9.7% in 2019 whilst the total number of units has also decreased from 197 to 196. There has been an increase in the total number of units in some of the District Centres with, for example, the opening of the community centre within DC09 Hall Road. Within other centres some units have merged (for example the number of units in DC06 Earlham House has reduced by two due to two lots of mergers). The vacancy figures for District Centres show an overall gradual decline over recent years although there was an increase in 2018. There has been no change in the total number of non-retail units since 2018 and no change in the number of District Centres which exceed the 40% non-retail threshold set out in Development Management Policy DM21.

69. Bowthorpe district centre DC01 has had 4 units occupied since 2018 which has reduced its vacancy rate from 35.3% to 11.8%. This means that it is no longer the worst performing district centre in terms of vacancy. It does still have one of the highest non-retail rates; however there have been no further changes away from A1 since 2018.

70. Drayton Road district centre DC02 now has the highest vacancy rate with 20% of units being unoccupied (although there has been no change to the vacancy rate since the last monitoring period). The non-retail percentage rate is only 26.7% which is well clear of the 40% recommended maximum guideline.

71. Earlham House district centre DC06 was previously recognised as one of the poorest performing district centres in terms of vacancy rates in 2016. However, since that time the centre has benefitted from some refurbishment. In 2018, 15 of the 17 units were occupied and now, in 2019, all units are now fully occupied with there being two lots of mergers within this District Centre taking place within the monitoring period. This is now one of the best performing retail centres with the non-retail percentage rate also being low at only 20%.

72. There are two other district centres which have all of their units occupied which are The Larkman (DC07) and Hall Road (DC09) centres. Hall Road district centre DC09 was regarded as poor performing in both 2016 and 2018. A community centre has however now opened and there are currently no vacant units within this centre. 50% of the units however are non-retail use. DC08 Dereham Road/Distillery Square has also witnessed a reduction in vacancies with 36 of the 37 units being occupied. 35.1% of units are in non-retail use which is below the 40% non retail threshold.

73. In 2018, DC03: Eaton Centre had no vacancies but 2 of the 19 units are now vacant and there have also been increased vacancies in DC04 Plumstead Road, DC05 Aylsham Road/Mile Cross and DC10 Sprowston Road/Shipfield

which are all District Centres where the 40% non retail threshold has been exceeded. A new Lidl has opened adjacent to DC05 (Aylsham Road/Mile Cross) which is just outside of the District Centre boundary (so not counted as a unit within this monitoring report). It will be interesting to see over the next few years what impact this has upon the centre.

74. Of the 196 units in the 10 district centres 19 units are vacant which is a reduction from 23 vacant units in 2018. The percentage of non-retail units is 40.8% which continues the gradual decrease (positive) from recent previous monitoring. There was a reduction in non-retail units within DC05 (Aylsham Road/Mile Cross) whilst there was an increase in DC09 (Hall Road). There has been no change in the number of district centres which exceed the 40% non-retail threshold set out in Development management policy DM21 and this remains at seven of the ten which are as follows:

- DC01: Bowthorpe
- DC02: Drayton Road
- DC03: Eaton Centre
- DC04: Plumstead Road
- DC05: Aylsham Road/Mile Cross
- DC07: The Larkman
- DC09: Hall Road
- DC10: Sprowston Road/Shipfield

75. A number of these centres have non-retail percentages only just over 40%, so in many cases it would just take one or two units changing to retail to satisfy the policy ambition. However, applications locally and patterns nationally over recent years have shown that this is considered to be moving in the opposite direction with an increase in non-retail uses. In any case, it is recognised that some non-retail units such as restaurants and cafes, along with community, service and leisure uses can add to the vitality and viability of a retail centre.

Table 7: District Centres defined in the adopted Norwich Local Plan 2014

Ref No	Centre name	Total units	Vacant units	% vacant/ annual change	Non retail units	% non-retail
DC01	Bowthorpe	17	2	11.8%	8	47.1%
DC02	Drayton Road	15	3	20%	4	26.7%
DC03	Eaton Centre	19	2	10.5%	10	52.6%
DC04	Plumstead Road	31	5	16.1%	14	45.2%
DC05	Aylsham Road/ Mile Cross	21	3	14.3%	9	42.9%
DC06	Earlham House	15	0	0.0%	3	20.0%
DC07	The Larkman	13	0	0.0%	6	46.2%
DC08	Dereham Road/ Distillery Square	37	1	2.7%	13	35.1%
DC09	Hall Road	8	0	0.0%	4	50.0%
DC10	Sprowston Road/ Shipfield	20	3	15.0%	9	45.0%
TOTAL		**196**	**19**	**9.7%**	**80**	**40.8%**

Key

Vacancy rate is **unchanged** since last survey
Vacancy rate is **up** since last survey
Vacancy rate is **down** since last survey

Proportion of A1 retail units is **ABOVE** 60%
Proportion of A1 retail units is **BELOW** 60%

Local centres

76. Table 8, below, shows vacancy rates and percentage of non-retail units for the 28 local centres.

77. Of the 323 units, the number of vacant units is 23, representing an increased vacancy rate of 7.1% in 2019 compared to the 2018 figure of 6.5%. The vacancy rate is however lower than it was in 2016 where 7.5% of units were unoccupied. Half of the local centres are fully occupied (14 out of 28) and there has been an increase of 1 no. units since 2018.

78. Improvements in vacancies since 2016 have taken place in LC01 Hall Road/Trafalgar Street, LC05 Suffolk Square, LC13 Catton Grove Road/Ring Road, LC28 Magdalen Road/Clarke Road and LC29 Aylsham Road/Copenhagen Way where the uptake of shops has now resulted in no vacancies. There has also been reduced vacancies within LC14 Magdalen Road, and LC30 St Stephens Road. The local centres which have had increased vacancies during the monitoring period are LC06 Unthank Road, LC11 Aylsham Road/Boundary Road, LC15 Sprowston Road/Silver Road, LC18 Earlham West Centre, LC19 Colman Road/The Avenues LC24 Witard Road and LC25 Clancy Road.

79. The percentage of non-retail units across all of the centres is 45.2% which is the same as in 2018. This average figure remains comfortably below the 50% threshold. 22 of the 28 centres have a proportion of A1 retail units above the 50% policy target and are policy compliant. 5 sit at the recommended 50% threshold; 17 are below the threshold and are not policy compliant.

80. Six local centres have exceeded the DM21 policy threshold and have greater than 50% non-retail uses. These centres are listed below and are the same six centres as in 2018

- LC06: Unthank Road;
- LC07: St Augustine's Gate;
- LC12: Woodcock Road;
- LC15: Sprowston Road/Silver Road
- LC26: UEA; and
- LC29: Aylsham Road/Copenhagen Way.

81. The following local centres are recorded as having exactly 50% non-retail. Any changes of use of existing A1 units to non-retail uses will cause the DM21 policy threshold to be exceeded:

- LC02: Hall Road/Queens Road
- LC11: Aylsham Road/Boundary Road
- LC14: Magdalen Road
- LC17: Bishop Bridge Road
- LC28: Magdalen Road/Clarke Road

82. LC02: Hall Road/Queens Road is a new addition; whilst LC10: Aylsham Road/Glenmore Gardens has dropped off the list of centres which has exactly 50% non-retail.

83. Overall, the district and local centres continue to perform their function and to offer an appropriate range of local services and facilities, with small food stores, where present, being most important to their success.

Table 8: Local Centres[12] defined in the adopted Norwich Local Plan 2014

Ref No	Centre name	Total units	Vacant units	% vacant/ annual change		Non retail units	% non-retail	
LC01	Hall Road/ Trafalgar St	7	0	0.0%		1	14.3%	
LC02	Hall Road/ Queens Road	28	1	3.6%		14	50.0%	
LC03	Hall Road/ Southwell Road	7	0	0.0%		3	42.9%	
LC04	Grove Road	14	1	7.1%		5	35.7%	
LC05	Suffolk Square	9	0	0.0%		4	44.4%	
LC06	Unthank Road	42	4	9.5%		22	52.4%	
LC07	St Augustine's Gate	8	2	25.0%		6	75.0%	
LC08	See footnote							
LC09	Aylsham Road/ Junction Road	8	2	25.0%		1	12.5%	
LC10	Aylsham Road/ Glenmore Gardens	13	0	0.0%		6	46.2% %	
LC11	Aylsham Road/ Boundary Road	12	2	16.7%		6	50.0%	
LC12	Woodcock Road	7	0	0.0%		4	57.1%	
LC13	Catton Grove Road/Ring Road	12	0	0.0%		4	33.3%	
LC14	Magdalen Road	14	1	7.1%		7	50.0%	
LC15	Sprowston Road/ Silver Road	7	1	14.3%		5	71.4%	
LC16	See footnote							
LC17	Bishop Bridge Road	8	0	0.0%		4	50.0%	

[12] Local centres at **Dereham Road/Distillery Square** (previously LC08) and **Sprowston Road/Shipfield** (previously LC16) were redesignated as district centres following the development of new anchor foodstores and renumbered as DC08 and DC10 respectively in the 2014 local plan. They are listed in table 7 above. The local centre at **St Stephens Road** newly designated in that plan (LC30) falls partly within and partly outside the city centre. The retail floorspace within that part of the local centre is included within the floorspace and unit totals in Table 6.

Ref No	Centre name	Total units	Vacant units	% vacant/ annual change		Non retail units	% non-retail	
LC18	Earlham West Centre	20	2	10.0%		9	45.0%	
LC19	Colman Road/ The Avenues	16	3	18.8%		3	18.8%	
LC20	Colman Road, The Parade	11	1	9.1%		5	45.5%	
LC21	Woodgrove Parade	9	0	0.0%		3	33.3%	
LC22	St John's Close/ Hall Road	11	0	0.0%		3	27.3%	
LC23	Tuckswood centre	5	0	0.0%		1	20.0%	
LC24	Witard Road, Heartsease	9	1	11.1%		3	33.3%	
LC25	Clancy Road, Heartsease	5	1	20.0%		2	40.0%	
LC26	UEA	9	0	0.0%		7	77.8%	
LC27	Long John Hill	5	0	0.0%		1	20.0%	
LC28	Magdalen Road/ Clarke Road	8	0	0.0%		4	50.0%	
LC29	Aylsham Road/ Copenhagen Way	5	0	0.0%		4	80.0%	
LC30	St Stephens Road	14	1	7.1%		9	64.3%	
TOTAL		**323**	**23**	**7.1%**		**146**	**45.2%**	

Key

Vacancy rate is **unchanged** since last survey
Vacancy rate is **up** since last survey
Vacancy rate is **down** since last survey

Proportion of A1 retail units is **ABOVE** 50% policy target
Proportion of A1 retail units is **BELOW** 50% policy target
Proportion of A1 retail units is **AT** 50% policy target

Conclusions

84. The 2018 retail monitor suggested that Norwich was experiencing a number of challenges in terms of vacancy levels, but the picture has been more positive over the past 12 months or so with vacancy rates decreasing in the city centre as a whole. Vacancy rates in particular have fallen in the Large District Centres and the rest of the city centre and, although the number of vacant units within the primary retail area have increased, there has been a reduction in available vacant floorspace. The secondary area has seen slight increases in vacant floorspace.

85. Over the past 12 months there has however been a significant reduction in the amount of retail floorspace within the city centre with retail floorspace decreasing by 6,231 sqm (2.7%). This decrease is greater than the last 10 years combined. The significant reduction in retail floorspace can largely be attributed to the diversification of the recently rebranded Castle Quarter (formally Castle Mall) where there has been the opening of a number of leisure uses which now occupy some of the larger units.

86. All of the retail frontages in the Primary area remain within the recommended minimum percentage of A1 use as set out in the 'Main Town Centre Uses and Retail Frontages' Supplementary Planning Document (2014). A number of the frontage zones have actually seen a small increase in the percentage of A1 frontage since 2018 but the most significant change has been within the Castle Quarter where the percentage of A1 frontage has reduced from 95.6% to 85.2%. Vacancy rates have however fallen within Castle Quarter from 26% to around 18% in the same period.

87. As can be seen from Table 9 below, between 2018 and 2019 the city centre has seen a trend of falling vacancies but has also seen a reduction in A1 floorspace and unit numbers. The 2018 report showed a continuation of a gradual increase in both vacancies and floorspace whereas this survey has shown a reversal in vacancy rates whilst an acceleration in the loss of retail floorspace. Local and district centres have also performed well during the monitoring period and although vacancy rates have increased in local centres they are still lower than they were in 2016.

88. The retail sector both nationally and within Norwich has experienced a lot of challenges in recent years brought about by changing consumer behaviour driven by technology and prevailing economic conditions. These challenges will have ongoing impacts for the viability of some retail businesses.

89. It is also important to acknowledge that there are many changes that can take place within retail centres without the direction of the council (i.e. temporary and permanent changes of use of small retail units). The added flexibility within retail centres could reduce vacancy rates and provide a wider range of amenities and services but this flexibility is most beneficial in areas which have experienced high long-term vacancy rates.

90. Despite a reduction in retail floorspace and footfall, Norwich remains a robust and thriving retail centre in the East of England. To continue this relative success, the council may need to identify other ways to influence and cultivate the retail offer of Norwich given the potential challenges faced, including working closely with Norwich BID and other key stakeholders.

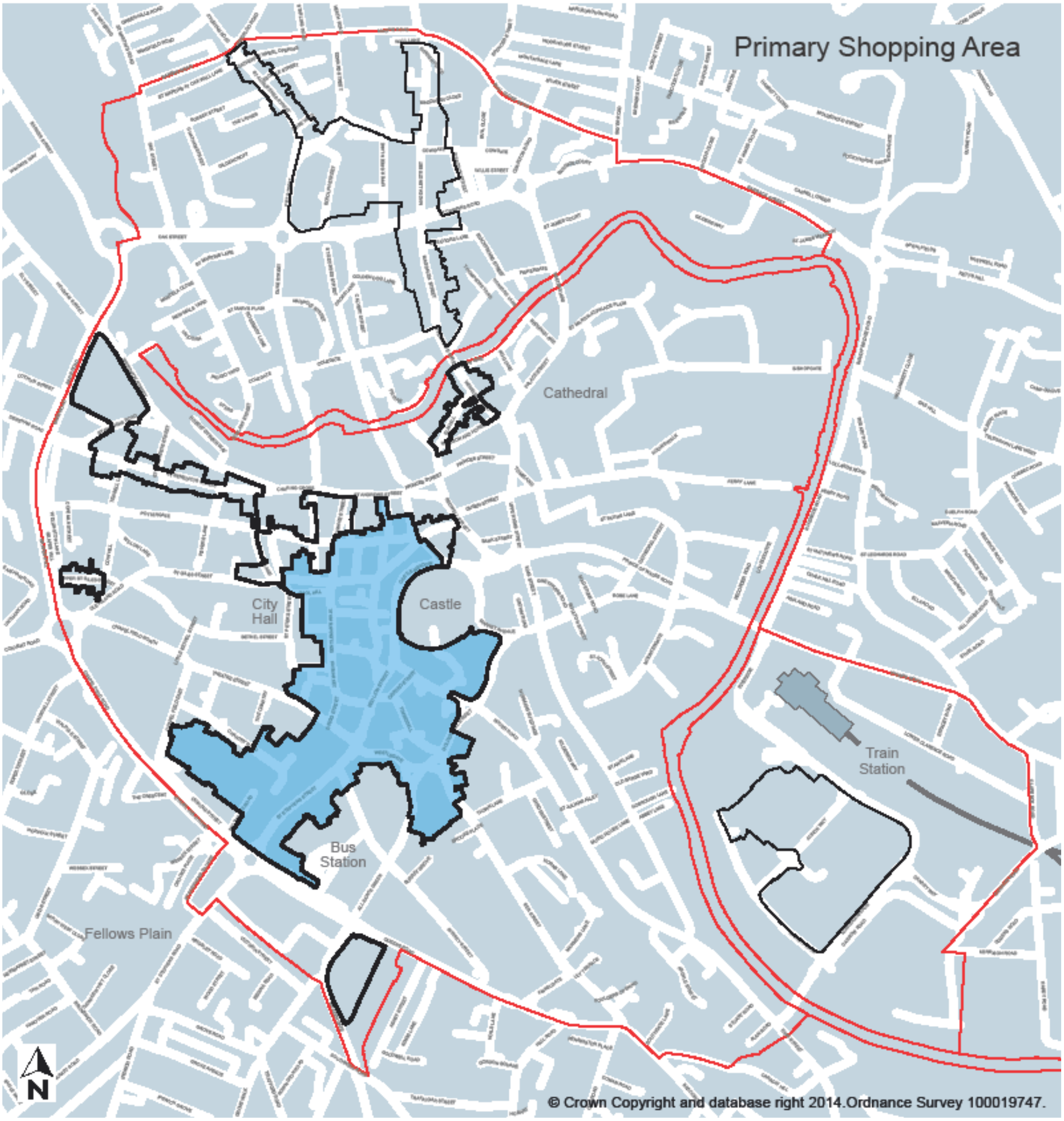
Table 9: 'At a Glance' The direction of travel of vacancy rates and retail floorspace in Norwich since 2018

Area	Available vacant floor space	All vacant floor space including refurbishment	Number of vacant Units	Overall Floor Area	Overall units
City Centre	↓	↓	↓	↓	↓
Primary Area	↓	---	↑	↓	↓
Secondary Area	↑	↑	---	↓	↓
Large District Centres	↓	↓	↓	↓	↓
Rest of city centre	↓	↓	↓	↓	↓
District Centres	N/A	N/A	↓	N/A	---
Local Centres	N/A	N/A	↑	N/A	↑

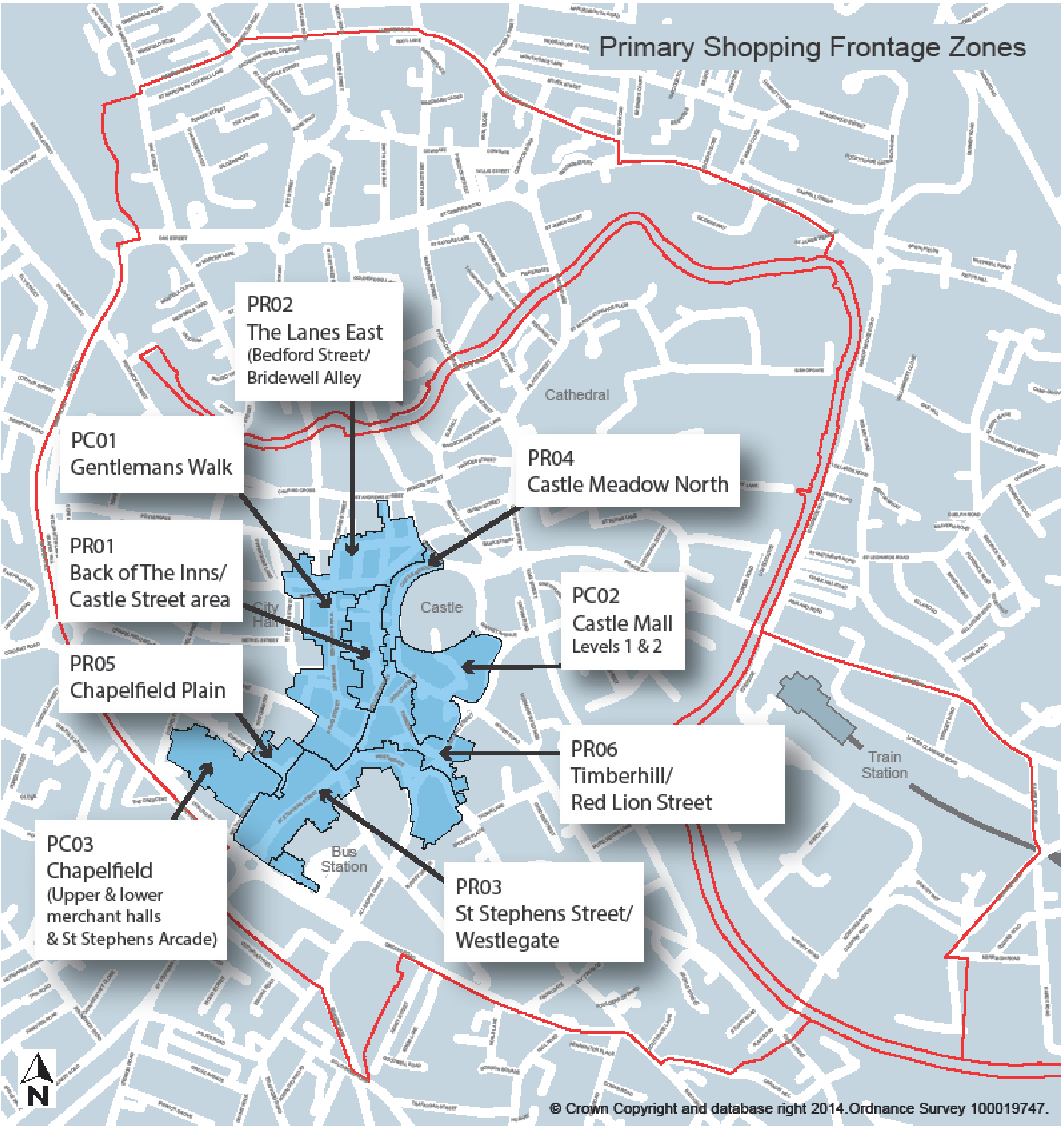
Key
↑ = increase
↓ = decrease
Red = Moving in a negative direction
Green = Moving in a positive direction
Grey = No change

Supporting Maps

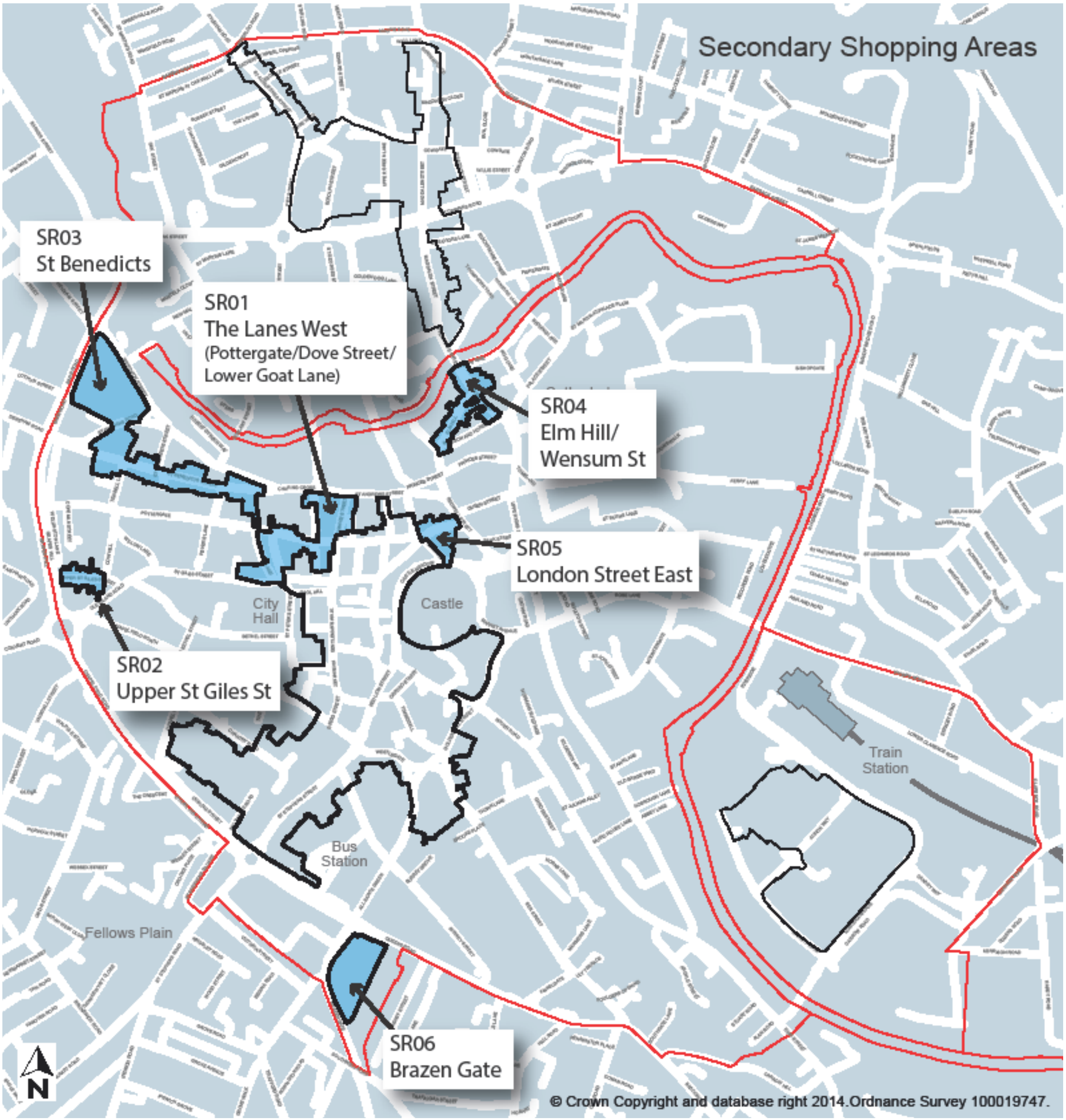
Map 1: Primary shopping area



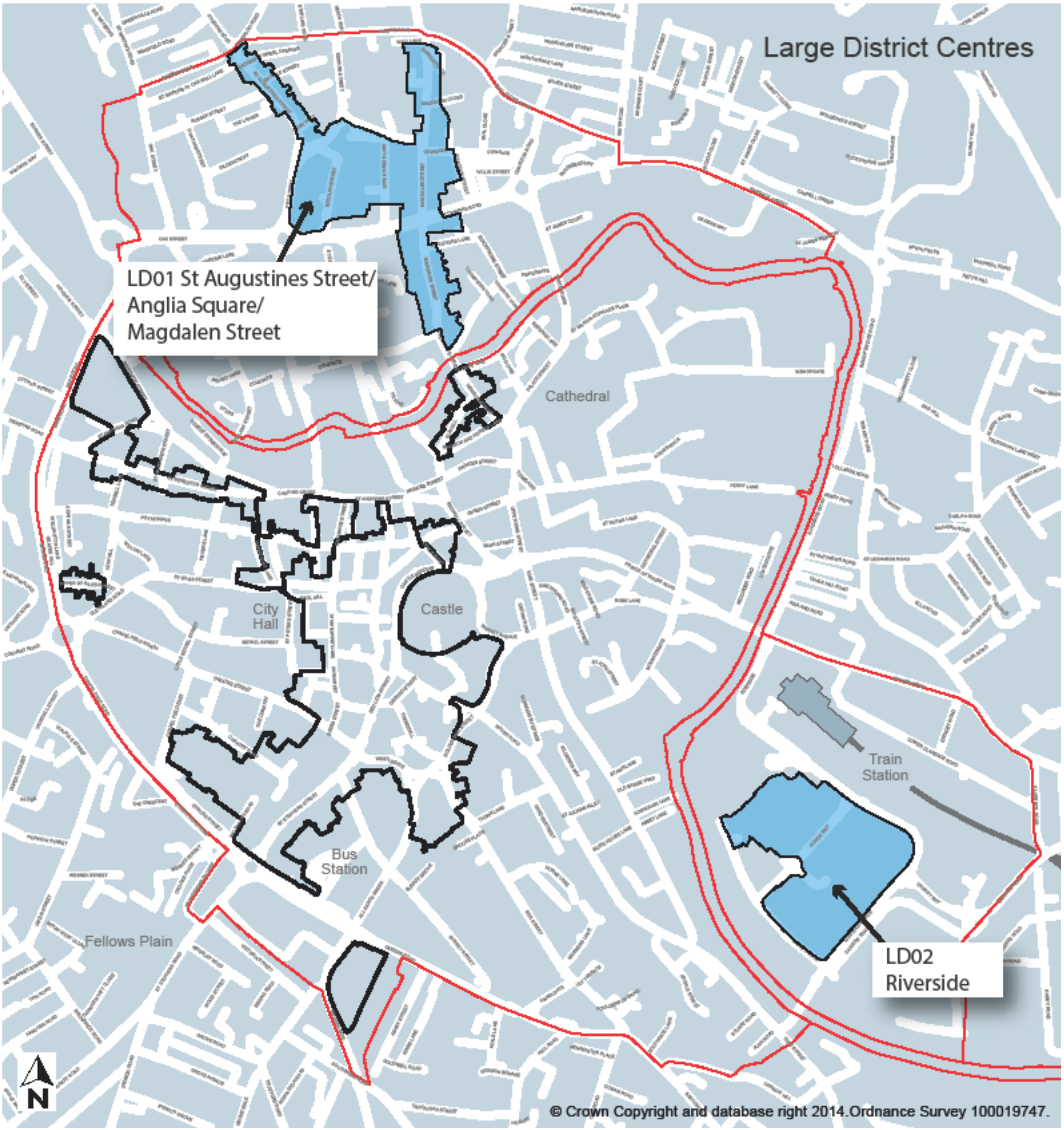
Map 2: Primary area frontage zones



Map 3: Secondary shopping areas



Map 4: Large district centres (Magdalen Street, Anglia Square, St Augustine's Street & Riverside)



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