

Sustainable development panel

Date: Wednesday, 15 November 2017

Time: 09:30

Venue: Westwick room, City Hall, St Peters Street, Norwich, NR2 1NH

Committee members:*

Councillors:

Brociek-Coulton
Davis
Grahame
Jackson
Lubbock
Malik
Thomas (Va)
Stonard

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Agenda

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1 **Apologies**

To receive apologies for absence

2 **Declarations of interest**

(Please note that it is the responsibility of individual members to declare an interest prior to the item if they arrive late for the meeting)

3 **Minutes**

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To agree the accuracy of the minutes of the meeting held on 13 September 2017

4 **Greater Norwich Local Plan Progress Update**

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Purpose - To report the progress being made on the Greater Norwich Local Plan and consider the draft Regulation 18 consultation document in advance of the Greater Norwich Development Partnership Board (GNDP) meeting on 20 November and its subsequent consideration by cabinet.

Date of publication: **Tuesday, 07 November 2017**

MINUTES

Sustainable development panel**09:30 to 12:20****13 September 2017**

Present: Councillors Stonard (chair), Thomas (Va) (vice chair), Brociek-Coulton, Grahame, Davis, Jackson, Lubbock and Malik

1. Declarations of interest

There were no declarations of interest.

2. Minutes

RESOLVED to agree the accuracy of the minutes of the meetings held on 19 July 2017.

3. Norwich City response to Norwich Airport Draft Masterplan

(A copy of a plan showing the location of Site 4 on the airport site was displayed at the meeting.)

The head of planning services presented the report and the proposed city council response to the Norwich Airport Draft Masterplan. The panel had an opportunity to comment on the draft response which would be considered by the cabinet at its meeting later that day. He highlighted the key issues in the council's response as summarised in paragraph 19 of the covering report. He explained the reasons for the request for the airport to arrange a surface access strategy within a 3 year period, supported by a transport assessment and an amended masterplan to ensure consistency, because the masterplan was "light" on details of non-car journeys to the airport and did not address the impact of the Northern Distributor Road. Members were also advised of the long term benefit of retaining part of Site 4 to attract other aviation maintenance and servicing operations which would be beneficial to the local economy. In terms of environmental impact one flight per month for servicing had less impact than regular passenger flights. Members were advised that the masterplan sought to offer more distant destinations, and consequently flight operators would need late night flights to enable return flights to return the same day which would require a variation of the current planning permission which restricted the use of the terminal building after 23:00 and before 06:00.

During discussion the head of planning services and the planning policy team leader answered members' questions. The extension of the runway was in the second phase and a long term aspiration which would enable the use of larger aircraft. It would also allow for operations to be brought under planning control as it would require planning consent. Passenger numbers could be increased by extending the

hours of operation of the airport and the number of flights, without extending the runway.

In reply to a question, members were advised that the masterplan would be taken into account when planning applications were assessed and would inform changes of policy in the next reiteration of the local plan. The masterplan was not a formal part of the development plan but would be a material consideration. Members were advised that the consultation which ended on 15 September had been extended (it had originally been scheduled to close on 17 August) and had included a wide range of consultation including the Norwich Passenger Action Group, the Norwich Airport Consultative committee, parish councils and members of public. Specific details had not been included in the consultation documents. A member said that there should be an expectation that consultation was in line with the council's Statement of Community Involvement because the masterplan would be given weight in the assessment of planning applications and that local people who had not had an opportunity to comment had been disadvantaged. The chair said that he would be reluctant to impose the council's rules and procedures on a third party and the majority of members agreed that the extent of the consultation was sufficient.

A member sought further information about the 22 late flights where planning consent had been breached in the first six months of this year. She considered that the masterplan failed to address night flights as in order to increase passenger numbers to 1.5 million it would be necessary to increase flights outside the hours of the current operation. The head of planning services responded that the 22 late flights were not a breach of planning control as the current planning regime allowed late flights in some circumstances. He said that the terminal building had the capacity to deal with more flights. Discussion ensued on the environmental impact and on the affect that the expansion of passenger flights would have on residents. Members noted technological advances to aircraft and surface vehicles which would reduce emissions and mitigate air quality concerns. The masterplan projected the growth of its current operations and was based on market trends, economic data and informed by expert consultants. Members noted the importance of realistic projections and that the expected growth of Norwich Airport over 20 years had seen flight levels fall from the peak in 2007 due to the recession.

Councillors Grahame and Jackson said that the council's response was missing a separate section on the climate change element. The Green Party group would be making a separate response to the consultation and they referred to the response from the Climate Hope and Action in Norfolk organisation. The council had a leadership role and as part owner of the airport a responsibility for its carbon footprint. The environment impact assessment did not refer to climate change and the increase in passenger flights would not be sustainable in the medium term. Solar powered planes were a long term aspiration. The head of planning services referred to the absence of a national strategy for the development of regional airports and confirmed that the masterplan was in line with the Joint Core Strategy which supported the growth of the airport.

Discussion ensued on the need for the surface access strategy and the need to improve the road infrastructure around the airport. Members commented on the lack of public transport and the need to encourage people to use it rather than use their cars. Members also discussed the use of Site 4 for employment. A member suggested that the number of jobs on the site were of a low concentration per

hectare and questioned the robustness of the predicted creation of jobs. The panel noted that it would be more beneficial in the long term for aviation related jobs to be created on the site than the location of other unrelated businesses on this site. It was acknowledged that a concentration of business operations was required on the site to increase the viability of putting in services and infrastructure.

Discussion ensued. Councillor Grahame suggested that the council had a leadership role to ensure that the masterplan addressed the impact of an increase in the airport passenger numbers on climate change and that an independent assessment should be made to ensure that it did. In response, the head of planning services suggested that the council response should include a statement about the lack of information on climate change issues and ask for it to be included in the masterplan. Following discussion and on being put to a recorded vote, it was:

RESOLVED,

- (1) unanimously, to ask that cabinet amends the proposed city council response to the draft masterplan by requesting that officers add text to address the issue of climate change and longer term environmental impacts and request that further research be done to understand the potential emissions that would result from the growth envisaged in the masterplan in order to inform any proposals about the extent of mitigation that may be necessary;
- (2) subject to this change, with 6 members voting in favour (Councillors Stonard, Thomas (Va), Brociek-Coulton, Davis, Lubbock and Malik) and two members voting against (Councillors Grahame and Jackson), to endorse the proposed council response to the draft masterplan.

4. Carbon Footprint Report

(Councillor Maguire, cabinet member for safe city environment, attended the meeting for this item.)

The environmental strategy manager and environmental strategy officer presented the report and answered members' questions. Members congratulated the environmental strategy manager and team on its success in reducing the council's carbon footprint ahead of target. A member commented on the reduction in council services had whether this had an effect on the council's carbon footprint. Members were advised that contractors were appointed through a tender bid process which assessed energy efficiency and that they submitted data on energy use.

Discussion ensued on future measures to maintain the momentum to achieve further reductions in carbon emissions. The environmental strategy manager acknowledged that most of the "low level fruits" had been actioned. The introduction of new technology helped lower emissions, for instance installing LED lights into stairwells would reduce emissions.

Members were advised that where a third party rented or used property owned by the council the carbon footprint was recorded under the performance indicator NI186. Norwich Airport's carbon footprint was counted under NI186 and was not

captured under the city council's footprint. A member commented on NI186 and pointed out that the increase in food poverty could correlate with a reduction in energy use rather than efficiencies.

The panel noted that the council's car fleet had been reduced from 84 to 45 vehicles and that these were more energy efficient. Officers were cycling or walking between meetings.

Members noted that targets would need to be reset and that these should be more efficient.

RESOLVED to:

- (1) note the progress made on the delivery of the council's Carbon Management Programme;
- (2) congratulate the environmental strategy manager and members of the team on their contribution to the reduction of the council's carbon footprint ahead of target

5. Norfolk Strategic Framework Consultation

The head of planning services introduced Trevor Wiggett, the Norfolk Strategic Framework project manager. The Norfolk Strategic Framework (NSF) was a list of agreements between the councils and was a material consideration for the local plan. As the process required agreement by all councils the agreements tended to be lowest common denominator that all could agree. There was flexibility for councils so as not to limit the development of local plan documents. The framework assisted with demonstrating that the councils were complying with the duty to co-operate and improved consistency between local plans across Norfolk.

During discussion the head of planning services and the NSF project manager referred to the report and answered members' questions. He explained agreements 10 to 17 and said that the 33 per cent affordable housing target was not county wide and applied only to the area covered by the Joint Core Strategy. The chair confirmed that the agreement did not alter the city council's commitment to affordable housing. In reply to a question the head of planning services said that there was not a lot of detail on measures to improve the delivery of housing but that the use of eco-prefabs could be one factor for consideration. A member pointed out that in the emerging Greater Norwich Local Plan the housing needs buffer was 23 per cent yet the NSF was only 10 per cent, which ensured that all authorities would meet this level and that adjacent authorities would meet the need if the Broads plan could not. The head of planning services said that the NSF shared objectives included the reduction of greenhouse emissions and a number of measures to mitigate climate change.

A member suggested that there should be some consistency across all councils in the way that they conducted consultations and made information available to businesses and the public.

In reply to a question, the head of planning services explained that the Planning for Health protocol was a best practice approach to ensure that local planning

authorities liaised with health providers to ensure that services met the need of the local area.

RESOLVED to note the comments on the emerging framework that will inform discussions at future meetings of the Norfolk Strategic Planning Member Forum and note that a further iteration of the framework will be considered by the panel before it is adopted by cabinet.

6. Public Consultation on Draft River Wensum Strategy

(Councillor Lubbock that due to the length of the meeting she left the meeting during this item.)

The planning policy team leader presented the report and together with the head of planning services referred to the report and answered questions. Members were advised that 180 responses to the consultation had been received to date and that the consultation would close on 15 September 2017.

A member said that it was not appropriate for the panel to “endorse” the draft strategy and that he considered the panel should “receive” it at this stage and endorse the draft strategy when the outcome of the consultation was available. The chair said that the purpose of bringing the report to the panel was for an opportunity for the members to comment on the draft strategy during the consultation period. Members agreed to the amendment to the officer recommendation.

During discussion, Councillors Grahame and Jackson advised the panel that the Green Party group considered that the focus of the strategy should be on the environmental quality of the River Wensum and its biodiversity rather than a vision of it as an economic and leisure/tourism asset. The group also considered that the metal sheeting on the bank at some points of the river gave it a “canal like” appearance and should be replaced with a more natural alternative. Other concerns included that as far as possible access should be made to the river on one side first before extending the riverside walk on both sides; that community imperatives were important; that “private sector” funding should not be singled out in the objectives; and that there should be biodiversity corridors rather than patches of trees. The group would be submitting its own response to the consultation.

Discussion ensued in which the panel noted that the creation of the riverside walk was a long term priority of the council and was a policy in the local plan. Parts of the river side were in differing ownership and the path was extended as land became available through the planning process. A member pointed out that there was an inaccuracy on the plans around Whitefriars bridge (page 24 of the strategy) and the planning policy team leader undertook to look into this and ensure that it was amended if found to be inaccurate. Members noted that residents at St Edmunds Wharf were opposed to the extension of the riverside walk in this location and their responses to the consultation would be given serious consideration alongside all other responses. The action plan prioritised projects where funding had been identified and were judged to be capable of implementation in the short to medium term. A member said that he disagreed with the order of prioritisation; considered that the city centre riverside walk was given more importance than the riverside walk upstream of New Mills; and that the strategy, working with the county council, should include greater flood risk mitigation.

In response to a member's question, the panel was advised that there was a protocol in place between the Broads Authority and the city council to deal with issues of illegal mooring.

Councillor Jackson said he felt strongly that the biodiversity in the objectives for delivering the vision should be amended and as moved by Councillor Grahame it was proposed that paragraph 9(c) be amended by the insertion of "biodiversity corridors and trees". He explained that it was necessary to include biodiversity corridors as the reference to green infrastructure and the natural environment was not specific enough. The planning policy team leader confirmed that there was a reference to biodiversity corridors in the document and that she considered that it was too specific for the strategic objectives. The panel concurred with the addition of the word 'biodiversity' into the objective to read "Enhancing the natural environment, biodiversity and green infrastructure".

The chair took the opportunity to welcome the draft strategy and commended the officers involved in coordinating the strategy together.

RESOLVED to receive the vision (subject to the amendment of (c) as minuted above), objectives and proposed content of the draft River Wensum Strategy.

CHAIR

Report to Sustainable development panel

Item

15 November 2017

Report of Director of regeneration and development

4

Subject Greater Norwich Local Plan Progress Update

Purpose

To report the progress being made on the Greater Norwich Local Plan and consider the draft Regulation 18 consultation document in advance of the Greater Norwich Development Partnership Board (GNDP) meeting on 20 November and its subsequent consideration by cabinet.

Recommendation

To note the progress and comment on the draft consultation paper to be considered by the Greater Norwich Development Partnership on 20 November 2017.

Corporate and service priorities

The report helps to meet the corporate priority to provide a prosperous and vibrant city and the service plan priority to produce a local plan.

Financial implications

There are no direct financial implications arising from this report.

Ward/s: All

Cabinet member: Councillor Stonard – Sustainable and Inclusive Growth

Contact officers

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Background documents

None.

Report

Introduction

1. This is the latest in a series of papers updating Sustainable Development Panel on the progress with the Greater Norwich Local Plan (GNLP), the preparation of which is being steered by the Greater Norwich Development Partnership (www.gnlp.org.uk). Previous updates have tended to report the decisions made by the GNDP whereas this report presents a paper that will be considered by the GNDP on 20 November.
2. The Panel last considered progress on the GNLP at its meeting on 19 July (considering matters arising from a GNDP meeting on 23 June). This meeting considered the updated Strategic Housing Market Assessment, provisional figures for the number of homes to be allocated in the GNLP and the emerging approach for developing a range of reasonable growth options and the Panel resolved to:
 - (a) note the progress being made on the Greater Norwich Local Plan and the publication of the updates Strategic Housing Market Assessment;
 - (b) to recommend to cabinet that:
 - (i) Option 1 is the preferred option for additional housing allocations;
 - (ii) no options to be ruled out at this consultation stage to ensure the robustness of the GNLP;
 - (iii) a combination of Options 1, 2 and 3 will be considered but there needs to be evidence to support the sustainability of expansion of existing settlements;
 - (iv) there needs to be further evidence to support the sustainability of Options 4, 5 and 7;
 - (v) opposes the principle of creating new settlements.
3. Considerable work has continued since June on preparing the Regulation 18 consultation version of the GNLP. The Regulation 18 stage is an important part of the plan-making process, and is the main opportunity for residents, consultees, infrastructure providers etc to comment on the draft contents of a Local Plan. In particular, the Regulation 18 stage needs to detail the main policy alternatives under consideration, and invite representations on these. It had originally been intended to consider this matter in September with public consultation being undertaken in October, however the timetable has slipped from that which is published in the Local Development Scheme and it is now expected that public consultation will commence in January 2018.
4. It should also be noted that in September the government published a consultation called *Planning for the Right Homes in the Right Places* (<https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>). Among other things this consultation included a proposed standard methodology for the assessment of housing needs. The delay to the Local Plan preparation process has allowed this methodology to inform the consultation document. The city council's response to the recent government consultation document will be considered by cabinet on 8 November and is available on the website via this link:

<https://cmis.norwich.gov.uk/live/Meetingscalendar/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/394/Committee/1/SelectedTab/Documents/Default.aspx>

Contents of the draft Regulation 18 documentation

5. On 20 November GNDP Board meeting will, among other things consider the draft Regulation 18 consultation document, and whether to recommend to the three district councils' Cabinets that the document be issued for public consultation. The draft version of this document is attached to the paper. In advance of the meeting the county council's environment, transport and development committee and panels in all three districts are also due to consider the draft document. Particularly significant elements are covered below:
6. **Housing Numbers** - The proposed approach in the GNLP now uses the Government's recently released draft methodology for calculating housing need; rebases the plan period to 2017; and revisits the approach to the contingency or delivery buffer. The latter includes additional allocations and likely windfall development to help ensure the identified need is met. The combined result of these changes suggests that the GNLP will need to ensure sites are provided for at least **42,900** homes of which 35,700 are already allocated or permitted. Therefore, additional sites will need to be identified for at least **7,200** homes.
7. **Growth Strategy Options** - Six options for a growth strategy are included. The growth strategy will help locate the sites for the additional 7,200 homes. The options are broad and strategic outlining how much growth could be allocated to general locations and categories of settlement rather than to any specific place. All the options propose a common approach to locating the sites for 3,900 of the dwellings that both maximises the opportunity for brownfield growth in the urban area and ensures that there are opportunities in more rural locations. Each of the options takes an alternative approach for the remaining 3,300 homes. These options include: urban concentration; supporting the Cambridge Norwich Tech Corridor; a focus on transport corridors; and various levels of rural dispersal with and without a new settlement.
8. **The Influence of the Norwich Urban Area** - The concentration of jobs, services, facilities and travel options available in the Norwich urban area and its surroundings will continue to exert an influence on its surrounding area. In recognition of this influence, there has long been a policy approach called the Norwich Policy Area (NPA) which focusses development primarily in and around the urban area.
9. Currently, the NPA is, among other things, used as an area for measuring housing land supply, with the remaining parts of Broadland and South Norfolk treated as two separate areas. The NPPF requires needs to be met within the Housing Market Area (HMA). In the light of the updated Strategic Housing Market Area and the recently published proposed methodology for establishing housing needs the paper concludes that the retention of the NPA or a similar area for measuring 5 year land supply is not a reasonable alternative. However, both retaining a Norwich centred policy area for other policy purposes and not having a Norwich centred policy area are considered to be reasonable alternatives so the paper asks the question "Do you support a Norwich centred policy area and, if so, why and on what boundaries?".
10. **Settlement hierarchy and clustering** - The Regulation 18 document proposes that that current top three levels of the settlement hierarchy (Norwich Urban Area, Main Towns and (Key) Service Centres will remain as is. However, there are two alternatives for lower tier settlements: firstly, that they are retained as is (with perhaps

some minor changes of tier for particular settlements to reflect current service levels), in other words Service Villages, Other Villages and Smaller Rural Communities and the Countryside); or secondly, that these three categories are merged into one, Village Clusters. This latter option would reflect the fact that there are often service links between these settlements (e.g. one village may have a shop, the next a primary school and a third some employment opportunities), whilst recognising that people will also visit higher-order settlements for some services (such as a secondary school). Views are sought in the consultation document on how villages could best be clustered together.

11. **Infrastructure** - The document recognises the importance of infrastructure and asks questions to help establish needs. For example, the section on transport outlines the need to include a policy on supporting strategic improvements which “will need to recognise that the county council has identified the Norwich Western Link as one of its infrastructure priorities. As it develops, the GNLP will reflect progress towards delivery of the scheme”.
12. **Housing Allocations** - The GNLP will also include site allocations to meet the need for the minimum 7,200 additional homes. Consequently, there will be a parallel consultation on the sites that have been put forward by landowners and developers for consideration. At this stage, high level analysis of the sites has been undertaken to help inform the consultation, but no “preferred” sites are identified in the Regulation 18 consultation. All the sites proposed (by the deadline of 31st July 2017) will be consulted on and the consultation comments assessed.
13. New sites will be able to be submitted during the Regulation 18 consultation period, which will run from early January to mid-March 2018, and additional material or evidence to support (or object to) existing sites will also be acceptable. The choice of preferred sites will only be included in the GNLP at the next stage of plan-making, having been subject to more rigorous assessment.
14. **Other Documents** – There is a considerable amount of further evidence which will be available to inform the consultation on the growth option. This is still being worked on by officers but is expected to include:
 - Site proposals document detailing sites proposed for development as part of this process;
 - The Interim Sustainability Appraisal
 - The Strategic Housing Market Assessment 2017
 - Viability study
 - Strategic Flood Risk Assessment
 - Economic, retail and town centres study
 - Interim Habitats Regulation Assessment
15. In considering the consultation document members are asked to focus on commenting whether the questions posed are the right ones rather than seeking to answer them at this stage. The Panel will get a chance to consider whether it wants to make a response to the consultation document during the consultation.

Next Steps

16. If approved by the GNDP Board and the three cabinets (Norwich City Council's cabinet is due to consider the papers on 13 December 2017), public consultation is expected to commence in early January and run to mid-March 2018. In addition to the consultation material being available on the GNLP website, there will be a series of "roadshows" at various venues across Greater Norwich (the precise dates and locations are to be confirmed) at which GNLP officers will be available to answer questions on the consultation.
17. Following the close of the consultation period, all representations will be assessed, and the GNLP will advance to the pre-submission (Regulation 19) stage. This representations period is expected to be reached in mid-2019.

GROWTH OPTIONS

Draft

FOREWORD - THE CHOICES WE FACE

Broadland, Norwich City and South Norfolk are great places to live and we all face many challenges to maintain what is special to each of us. The economy of our area is set to grow significantly during the plan period to 2036, promoting local prosperity. Well planned growth brings great benefits, providing us with the high quality homes, jobs and infrastructure we need, while at the same time protecting and improving our special environment. This is why this consultation is important.

We already have plans in place identifying where the new homes, jobs, green spaces and additional infrastructure we will need to 2026 will be built. The main locations include brownfield sites in Norwich, the major urban extension to its north-east, expanded strategic employment sites such as the Norwich Research Park and some growth at most of our towns and larger villages.

But we now have to make choices over where the identified additional growth needed to 2036 will go. The approach we take will have important long term implications for both our urban and rural communities. Should we continue to build on our current strategy which mainly concentrates growth close to Norwich? Or should we take a different approach, dispersing more of the additional homes to villages? Also, we could plan for a new settlement or settlements which could help meet our growth needs further into the future, or we could combine elements of different approaches.

There are lots of issues to take into account in making these choices. Social, environmental and economic factors must all be considered in deciding the best growth strategy. Most importantly, we need to make sure that we chose locations where new development, particularly the new homes we so desperately need, are delivered. As a current Government consultation document says “The housing market in this country is dysfunctional. The root cause is very simple: for too long, we haven’t built enough homes”. In addition, having too few houses built leaves us vulnerable to non-planned, speculative housing development.

We are taking a joined up approach working together as district councils and the county council with other providers of the facilities which support growth, such as transport, health care, education and water infrastructure. Current transport improvements, with the opening of the Northern Distributor Road, planned improvements to the A47 and new public transport and cycling facilities will affect growth choices. In addition, the plan will have to be adaptable as technologies develop in the future. For example, advances in digital communications will undoubtedly shape our lives as we move to 2036 and there are likely to be other changes that we don’t yet know about.

However our lives do change, sustainable access from homes to services and jobs will remain the key consideration for good planning. We need to plan for economic growth in the right locations, especially for high technology jobs. We also need to find the right sites to help young people currently struggling to get their first home and, with an aging population, for more homes for older people. To support this growth, we must make best use of the infrastructure we already have and plan for the new infrastructure we’ll need.

These are just some of the issues we must consider and choices we have to make through the Greater Norwich Local Plan. Please help us by providing your views and local knowledge.

Draft

SECTION 1 - INTRODUCTION

Why are we producing the Greater Norwich Local Plan?

- 1.1 The Greater Norwich Local Plan (GNLP) will provide the planning strategy and identify the sites for growth across the three districts of Broadland, Norwich and South Norfolk until 2036. We have to take a long term view of our development needs to 2036 to allow the housing, jobs, services and infrastructure we need to be provided at the right time and in the right place. Such a long term plan-led approach is good planning and is required by Government.
- 1.2 The Greater Norwich Development Partnership (GNDP) has been established to co-ordinate production of the plan. The GNDP consists of the three district councils, with the support of Norfolk County Council and the Broads Authority.
- 1.3 Greater Norwich is a key engine of growth nationally. The area is one of the fastest growing parts of the country and is establishing itself as a leader in science, technology and manufacturing. The partners are committed to helping to turn world class knowledge and ideas into world class jobs, particularly in key growth sectors such as the life sciences and biotechnology, agri-tech, food and drink, creative and digital industries, high-value engineering. We also need to support and boost other sectors such as tourism.
- 1.4 To do this, we must make the best of our main strengths including our vibrant, historic city centre, which will play a pivotal role in the economic success of Greater Norwich, our attractive suburbs, towns and villages, key strategic employment locations such as the Norwich Research Park (NRP), the varied and attractive environment, the area's heritage, excellent higher education facilities and rapidly improving transport links.
- 1.5 Significant new infrastructure is currently being delivered or is planned. This new infrastructure, along with foreseeable technological changes such as digital communications improvements and further changes that are more difficult to predict at present, will inevitably affect how the area grows to 2036. It is therefore essential that we plan flexibly for a changing world.
- 1.6 Whilst planning flexibly for new jobs, homes and infrastructure, the GNLP must also protect and enhance our many environmental assets and provide for well-designed new development which will create attractive, sustainable new communities. This will help to ensure that Greater Norwich continues to be a great place to live and work.

- 1.7 To achieve our aims, the GNLP will need to reflect the Government's requirements for local plans set out in the National Planning Policy Framework ([NPPF](#)) along with priorities set out in other strategies, agreements and initiatives which provide the context for growth in Greater Norwich. These include the [Greater Norwich City Deal](#), the Norfolk Local Transport Plan, the Norwich Area Transportation Strategy (NATS), national and regional rail and road investment strategies and programmes, the existing New Anglia Local Enterprise Partnership (LEP) Strategic Economic Plan and its emerging Economic Strategy and the Cambridge Norwich Tech Corridor initiative.
- 1.8 The Norfolk Strategic Framework (NSF), which is currently being produced, will also have an influence on the GNLP. It is an agreement between planning authorities in the county on approaches to strategic infrastructure, housing and jobs numbers and common policy approaches.
- 1.9 The currently adopted strategy planning to 2026, the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS), along with adopted Site Allocations Plans, Area Action Plans (AAPs) and Neighbourhood Plans in each of the three districts, set out where a high proportion of the growth required by the GNLP to 2036 will be located. As such, they will have a considerable influence on the new plan.
- 1.10 This means that the GNLP will need to plan for the additional growth needed to 2036. We will also need to have an eye on the long term beyond 2036. To establish how this can best be achieved, we need to identify the broad strategy for where the additional growth will be located, the sites for that growth and how we should plan for issues such as supporting the economy, environmental protection and good design.
- 1.11 This will involve discussions, including this consultation, and later decisions, on the additional growth needed and the options for distributing the growth close to Norwich, around towns and larger villages and in more rural areas. It is important to bear in mind, however, that whichever growth options we choose in this strategy, current commitments¹ mean that the majority of the growth will be focussed in and around Norwich.
- 1.12 The key to the success of the GNLP will be ensuring the **delivery** of jobs, infrastructure and housing takes place. Jobs growth has been strong since the depths of the recession in 2011 and infrastructure is being significantly improved. However, like the rest of the country, not enough of the housing we need is being provided. The GNLP will be 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

¹ Commitments are existing planning permissions and land allocations in adopted plans.

Greater Norwich needs. To support delivery the councils are working in partnership as the Greater Norwich Growth Board (GNGB). The GNGB oversees decisions on investment in infrastructure to support growth and deliver on existing planning targets. The GNGB will continue to support delivery of the GNLP.

The consultation

- 1.13 This “Regulation 18” consultation on the plan is your chance to comment on how much growth will take place and how and where it will happen.
- 1.14 This document, the **Growth Options** for the GNLP, forms the main part of the consultation on the plan. The document covers the broad planning strategy for the area and thematic strategic policies for growth. It consists of the following sections:
1. This Introduction
 2. A Spatial Portrait of Greater Norwich
 3. The plan’s Vision and Objectives
 4. The Strategy
 5. Identifying Development Sites (linking to the Site Proposals document)
 6. Topic Policies
 7. Monitoring.
- 1.15 The second consultation document is the **Site Proposals** document. It provides the opportunity for comments to be made on sites submitted for different uses through the Call for Sites which was held in 2016 and those submitted subsequently up to July 31st 2017. It also enables people to propose additional sites and to give views on settlement boundaries.
- 1.16 The two documents are supported by an **Interim Sustainability Appraisal** which is also available for comment. This evaluates the alternatives identified.
- 1.17 Each section of this document has specific consultation questions for you to respond to. There is an open question at the end of the document to enable you to make any additional comments you feel necessary. Wherever possible, please could you set out reasons for your responses and any additional evidence that you think may be relevant. Some questions are mainly aimed at “technical consultees” such as infrastructure providers and environmental bodies, but we welcome evidenced views from everyone.
- 1.18 For some issues we have identified favoured options for the plan approach we think should be taken. In other cases, generally where we are continuing to collect evidence or where different policy approaches could be taken, we have identified what we believe to be reasonable alternative options. In some cases we have also identified why other approaches would be unreasonable. We welcome your views on any or all of the options and their justification.
- 1.19 The consultation runs from 9am on 5th January 2018 to 5pm on 22nd March 2018.

- 1.20 Consultation responses should preferably be made online at www.gnlp.org.uk. However, responses can be made in hard copy booklets. The booklets are available from xxxxxxxx.

Next steps

- 1.21 We will use your consultation responses to inform the evidence base for the Regulation 19 Publication version of the plan.
- 1.22 The Regulation 19 version will be the councils' chosen plan, including the growth strategy, general policies and site allocations. It is scheduled to be published in summer 2019 when it will be possible to make comments on the legal soundness of the plan.
- 1.23 Those comments will then be considered by a government appointed Inspector at the plan's Public Examination scheduled to start in June 2020, with adoption scheduled for December 2020.
- 1.24 When adopted, it is expected that the GNLP will supersede the current JCS and the Site Allocations documents in each of the three districts.
- 1.25 The GNLP will not amend existing adopted Development Management policies for the three districts except in very specific circumstances where limited policy changes may be required.
- 1.26 The future role of the adopted Area Action Plans for Long Stratton, Wymondham and the North East Growth Triangle (NEGT) and Neighbourhood Plans will be considered in plan making.

SECTION 2 - A SPATIAL PORTRAIT OF GREATER NORWICH

- 2.1 Greater Norwich has significant importance for the east of England and beyond and has three assets of international importance – its heritage, natural environment and a growing knowledge economy.
- 2.2 In 2015, the estimated total population of the three districts was 396,510, with 223,000 living in the Greater Norwich urban area.
- 2.3 Greater Norwich is key to the region's economy, and Norwich is a regional focus for employment, retailing, tourism, culture, education and leisure.
- 2.4 Most of the sectors identified as having high growth potential regionally² have a strong presence in the area, including: advanced manufacturing and engineering at Hethel; agri-tech and life sciences at the NRP; and ICT and Digital Culture in the city centre. Other strengths particular to Greater Norwich include health sciences, financial services, tourism, retail, media and arts.
- 2.5 There has been a 7.8%³ rise in overall employment from 2011-15 with notable increases in: accommodation and food services; IT and communications; professional, scientific and technical activities; education; and health and social work. Agriculture, manufacturing and insurance have all seen a fall in employment levels.
- 2.6 Of all the sectors, retailing remains the largest provider of employment. Norwich is rated as the 13th best performing retail centre nationally⁴ and a number of market towns surrounding Norwich also have a strong local retail offer.
- 2.7 Levels of employment in Greater Norwich compare favourably to national averages and the numbers claiming unemployment-related benefits have seen a significantly sharper fall in recent years than the UK average⁵.
- 2.8 Rural enterprises are important to the local economy and home working is likely to increase in significance. South Norfolk has the largest proportion of micro-businesses in the county⁶. Greater Norwich's business survival rate is above the national average.⁷
- 2.9 There is variable access to high speed broadband and mobile phone connectivity, and it can be poor, particularly in rural areas. To help address this, Better Broadband

² New Anglia Local Enterprise Partnership's Strategic Economic Plan identifies five high impact sectors which have high growth potential: Advanced Manufacturing and Engineering; Agri-tech; Energy; ICT/Digital Culture; and Life Sciences.

³ Calculated from figures supplied by NomisWeb, ONS Crown Copyright reserved. Number of part-time employees adjusted to reflect full-time equivalence (For 2011 part time hours at 42.2% of full time, and 2015 part time hours at 43.3% of full time to reflect national trends)

⁴ Source: CACI

⁵ Calculated from Claimant Count figures supplied by NomisWeb, ONS Crown Copyright Reserved [from Nomis on 3 August 2017]. Figures show a 59.5% fall in those claiming unemployment-related benefits, Job Seeker's Allowance (JSA) and Universal Credit (UC). This compares to a fall of 44% for the UK overall.

⁶ ONS Inter Departmental Business Register data, 2016 (from Nomis)

⁷ ONS Business Demography, 2015 – Business births, deaths and survival rates. Businesses in Norfolk have a better rate of survival over five years (44.7%) than the regional (43.1%) and national (41.4%) averages.

for Norfolk is a partnership funded through Norfolk County Council installing high-speed fibre optic networks across the county.

- 2.10 In December 2013, the Greater Norwich City Deal was signed, which is building on the area's leading status in science, technology and manufacturing and focuses on enterprise, skills and infrastructure.
- 2.11 Norwich's vibrant, attractive and historic city centre is a catalyst for economic growth across Greater Norwich, encouraging investment into the area.
- 2.12 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. The Cambridge-Norwich Tech Corridor initiative aims to boost economic development.
- 2.13 The A47 to the east of the area connects to Great Yarmouth and Lowestoft; they 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.
- 2.14 To the south, the A140, providing access to Ipswich, London and locally to Diss and Harleston, is almost entirely single carriageway. To ease congestion at Long Stratton, a bypass is planned to be delivered alongside 1,800 new homes.
- 2.15 The A47 to the west provides access to the Midlands, the North and growth areas at Dereham and King's Lynn. There is a Government commitment to making improvements to the A47, starting in 2020, including dualling, junction improvements at Thickthorn and safety measures towards Great Yarmouth.
- 2.16 The Norwich Northern Distributor Road (NDR), which aims to reduce congestion through the north of Norwich and improve access to the airport, coast and Broads, is under construction with completion scheduled for early 2018. Related improvements to public transport in Norwich are an integral part of the scheme.
- 2.17 The main rail service provides access to Wymondham, Diss, Ipswich, Cambridge and London. Improvements are planned, or already being delivered, on these lines. The Bittern and Wherry Lines provide local rail links and options for commuting from settlements such as Great Yarmouth, Lowestoft, Brundall, Acle, North Walsham, Cromer and Sheringham.
- 2.18 Norwich Airport is a catalyst for economic growth and there has been 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 international destinations, there is significant business from offshore industries and other destinations. Other principal international connections are via Stansted Airport and ports at Felixstowe and Harwich.
- 2.19 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 NRP and the city centre to the North-East Growth Triangle in Broadland, and to invest in other routes including between Wymondham, Norwich and Sprowston. Attracting additional funding for further initiatives is an

ongoing priority in the future. Norwich is in the top five districts in the country for cycle use.

- 2.20 Development of a Bus Rapid Transit (BRT) network is underway which, when complete, will provide infrastructure improvements and more frequent and faster services. The network will be developed further to promote public transport use in growth areas such as Wymondham, the airport and Broadland Business Park. The six Park and Rides sites around Norwich form one of the most comprehensive networks in the country and are well-connected to other bus routes. The Connecting Norfolk initiative promotes increasing use of demand responsive transport services and car sharing in rural areas.
- 2.21 There is an Air Quality Management Area (AQMA) which covers the whole of the city centre. Improvements in air quality are being achieved by road infrastructure changes and other initiatives. However, this remains an important issue with more work to be done.
- 2.22 Although per capita carbon dioxide (CO₂) emissions have declined in line with national trends, they are above the national average in rural parts of the area, largely due to a greater reliance on car journeys.
- 2.23 Climate change is expected to result in generally higher temperatures, wetter winters, drier summers and more extreme weather events. River flooding in parts of Norwich and surface water flooding in a number of locations are significant issues.
- 2.24 There has been an increase in renewable energy generation in recent years, chiefly from solar (both small and large-scale), wind and some biomass developments.
- 2.25 The city is surrounded by countryside of high environmental quality, with historic market towns and villages spread through an attractive landscape. Parishes close to the city have a strong relationship with the Norwich urban area, while large parts of the area look to the network of main towns and smaller Key Service Centres to meet every-day needs and provide employment.
- 2.26 River valleys and green areas extend into or adjoin many built-up areas, with the Broads stretching from the eastern edge of Greater Norwich into the heart of the city.
- 2.27 The area's landscape is diverse, including heathland, ancient woodland, grassland, wetland, marshland and reedbeds, forming a variety of habitats. Large tracts of rural Greater Norwich have high quality agricultural land.
- 2.28 Varied landscape character areas converge on Norwich: the fens and marshes of the Broads - a highly sensitive wetland environment of international significance; rolling landscapes of varied geology including woodland, heath and former parkland estates to the west and north; an extensive open clay plateau incised by rivers in the south; and a more intimate landscape of small fields and hedgerows in the east.
- 2.29 Work is ongoing to improve and expand the Green Infrastructure network throughout Greater Norwich and beyond.

- 2.30 The area has a rich concentration of historic buildings, churches, halls, historic parks and gardens, including many historic assets in Norwich and the surrounding market towns and landmark buildings such as Blickling Hall. Ancient monuments and significant archaeological potential add a further layer to this historic character.
- 2.31 There are internationally important wildlife sites across the area, particularly the River Wensum and in the Broads. Most of these are marshland, rivers or broads, so any potential impact on water quality is a key issue. There are challenges in dealing with pollution from fertilisers and pesticides⁸, with water quality a key issue for the environmentally sensitive Broads. There are also negative impacts on some wildlife sites resulting from the pressure from high visitor numbers.
- 2.32 Relatively low rainfall totals mean that the whole Greater Norwich area is defined as suffering from serious water stress⁹. Current local planning policy places a particular focus on promoting water efficiency.
- 2.33 The population of the area has higher than national average proportions of older people in Broadland and South Norfolk. Since they are popular retirement areas they are likely to see further growth in the older population¹⁰, adding to already significant pressure on residential and home care services.
- 2.34 There are higher than average proportions of young adults in Norwich. While the overall proportion of minority ethnic residents is relatively low there has been a significant increase since 2001, particularly in Norwich.
- 2.35 There are some wards with high levels of deprivation in Norwich. Although the suburban and rural parts of Greater Norwich are relatively affluent, there are pockets of deprivation elsewhere.
- 2.36 While the health of people in Broadland and South Norfolk is generally better than the national average, in Norwich it is markedly worse. There is also marked variation within the city with life expectancy being 10.9 years lower for men in the most deprived areas than in the least deprived¹¹.
- 2.37 Although levels of crime are some of the lowest in the country in much of Greater Norwich, there are higher crime levels in inner urban wards, particularly in areas with a concentration of late night drinking establishments.
- 2.38 The area benefits from a strong and growing tertiary education sector provided by the University of East Anglia, the Norwich University College of the Arts, City College Norwich and Easton College. A recent increase in the birth rate has increased demand for education and other children's services in the area¹².

⁸ From Broadland Rivers Catchment Plan: Over 90% of rivers fail to meet Water Framework Directive targets. <https://www.gov.uk/government/publications/anglian-river-basin-district-river-basin-management-plan> and <http://www.broads-authority.gov.uk/looking-after/managing-land-and-water/beyond-the-broads>

⁹ Water Stressed area – final classification, Environment Agency 2013
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf

¹⁰ Source: ONS 2014-based sub-national population projections.

¹¹ Index of Multiple Deprivation (IMD)

¹² Source: ONS 2014-based sub-national population projections

- 2.39 In more deprived parts of the area, educational attainment is low. Norwich has above the national average of 16-17 year olds not in education, employment or training (NEETs). Norwich also ranks particularly poorly for social mobility¹³. The picture for education, skills and training in Broadland and South Norfolk is significantly better.
- 2.40 Changing waste collection practices, including food waste collections in some parts, have helped the percentage of household waste recycled or composted to increase above the national average¹⁴.
- 2.41 Broadland and South Norfolk are dominated by owner-occupied housing, whilst Norwich has a much higher percentage of Local Authority social rented and private rented properties. 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.
- 2.42 There is a shortage of housing across all tenures in Greater Norwich. Overall delivery of housing from 2008-14 was at approximately 70% of the target, compared to a national delivery rate of 60%¹⁵. Completions have, however, increased every year since 2010.

¹³ Norwich ranked 323rd out of 324 lower-tier authorities for social mobility: Social Mobility and Child Poverty Commission, Jan 2016

¹⁴ In 2014/15 Greater Norwich had a recycling & composting total of 48% which exceeded Norfolk's average rate of 43%, and the national rate of 43.7%. Source: Department for the Environment, Food and Rural Affairs, Tables ENV18 - Local Authority Collected Waste: Annual Results Tables –*Table 3a: Regional Household Recycling Rates 2000/01 to 2014/15* <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>

¹⁵ From AMR, 2015-16: "Affordable housing completions were just 40% of the current target of 561 completions per year, partly reflecting the fact that overall completions are below target."

SECTION 3 - THE VISION AND OBJECTIVES FOR GREATER NORWICH

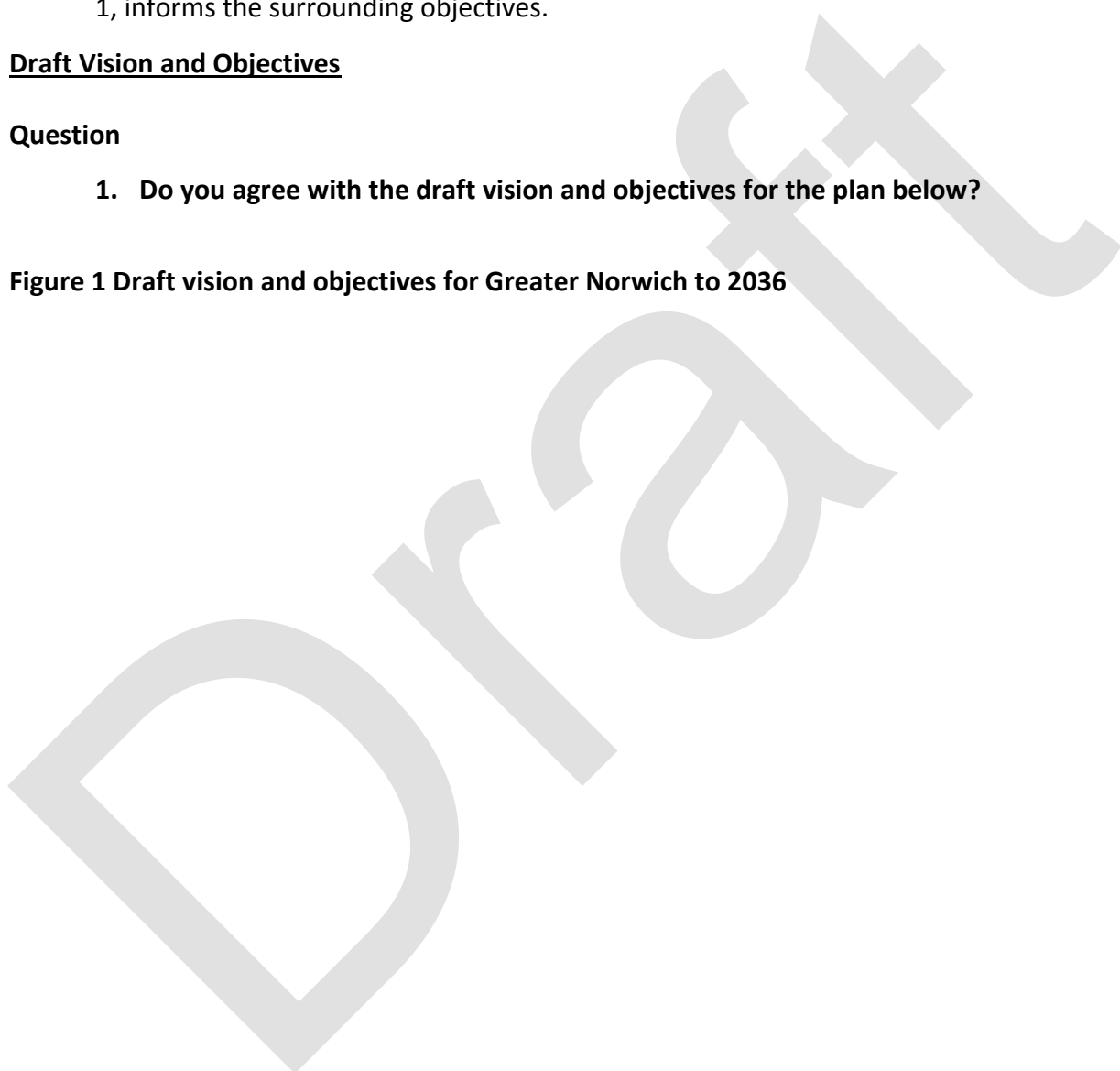
- 3.1 Establishing the vision and objectives is a key early stage for plan development as, in concisely setting out what the plan aims to achieve for Greater Norwich to 2036, they provide the context for policy development and monitoring indicators.
- 3.2 The draft vision and objectives in figure 1 below, agreed by the GNDP in January 2017, have been used to guide plan making so far. The vision, at the centre of figure 1, informs the surrounding objectives.

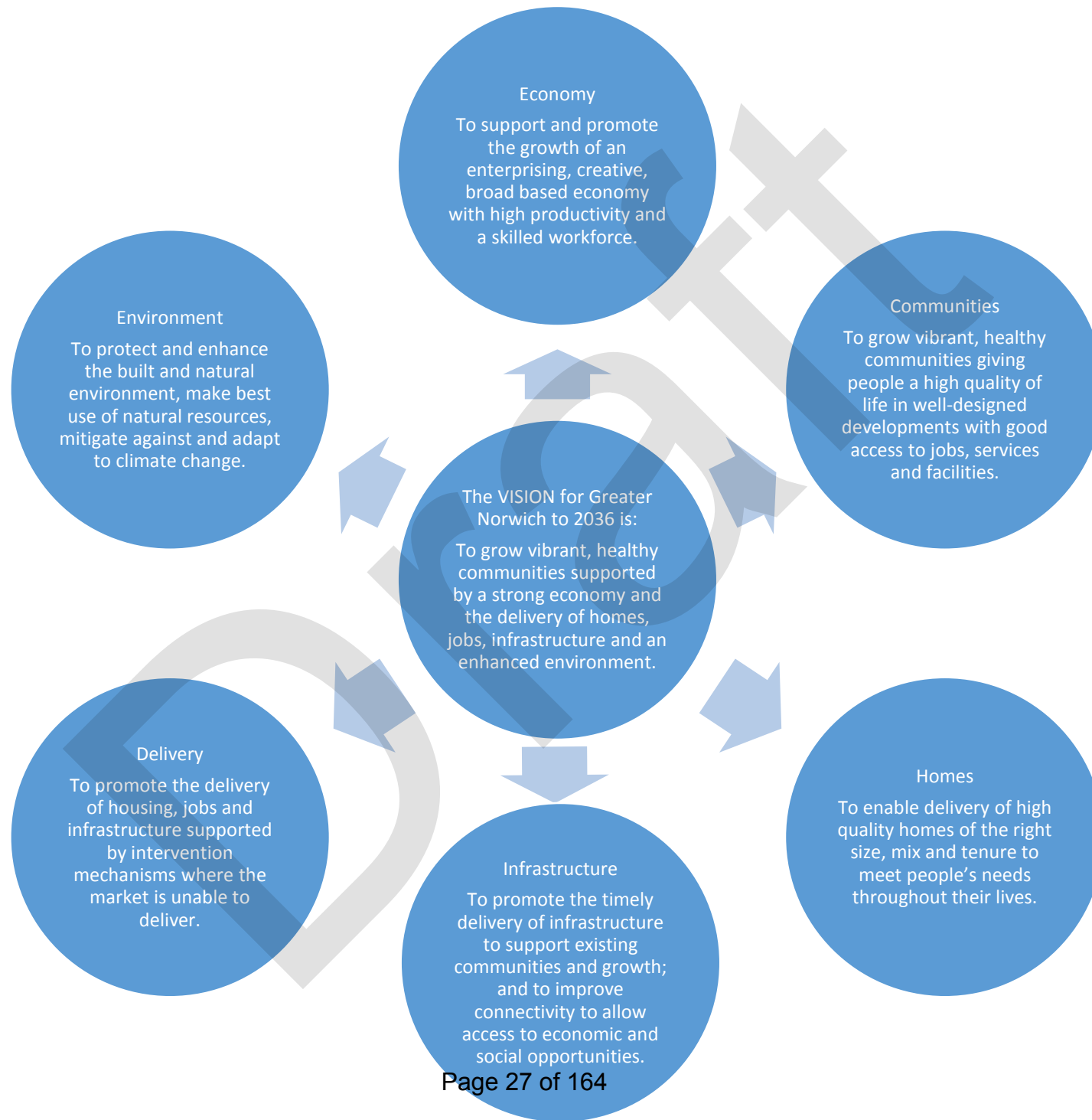
Draft Vision and Objectives

Question

1. Do you agree with the draft vision and objectives for the plan below?

Figure 1 Draft vision and objectives for Greater Norwich to 2036





SECTION 4 - THE STRATEGY

DELIVERING JOBS, HOMES AND INFRASTRUCTURE

- 4.1 Delivery is key to the success of the plan. The NPPF requires local plans to proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.
- 4.2 To achieve the Vision and Objectives of the plan, the GNLP will help to drive economic growth, delivering an increase on forecast growth in jobs and productivity. The plan will aim to support the delivery of 45,000 additional jobs by 2036 and enable growth in the economy, including in high productivity sectors. To make this happen the GNLP will include policies that:
- Support the economy through infrastructure investment, environmental enhancement and quality of life improvements;
 - Enable development of the strategic employment locations in the city centre, the Norwich Airport area, Broadland Business Park/Broadland Gate, NRP, Wymondham/Hethel, Longwater and the Food Enterprise Zone;
 - Promote the Cambridge Norwich Tech Corridor growth initiative;
 - Promote inclusive growth and social sustainability;
 - Provide for local employment close to where people live;
 - Support a thriving rural economy.
- 4.3 Growth will be located to make the best use of the existing transport and green infrastructure networks and community facilities, with new and improved infrastructure provided where it is needed to support growth.
- 4.4 The strategy will deliver the housing that is needed. To do this, we intend to provide sites for 42,865 new homes. Taking account of sites which are already permitted or allocated, we will need new sites for 7,200 homes. These figures include additional sites to provide a buffer to help ensure all the homes we need are delivered.
- 4.5 The plan will maximise urban brownfield site capacity and ensure greenfield development takes place in accessible locations, helping to sustain town and village life, providing choice and aiding housing delivery.
- 4.6 The majority of the planned growth is focussed in and around Norwich, with the city centre and other strategic employment sites supporting the area's regional, national and international economic functions and the suburbs and fringe parishes providing growing sustainable communities.
- 4.7 Growth of the economies of the main towns and rural areas will also be encouraged and supported, with some housing growth in all towns and in the villages with a range of services.

Question

- 2. Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1 to 4.7?** (If you wish to comment on jobs and housing numbers, please see questions 3 to 6 below).

Jobs targets

- 4.8 Jobs targets help focus the aims of local plan policy and ensure that economic policy aligns with housing policy and demographic projections. Although a jobs target is not a requirement and not all local plans have one, not having a target would undermine the ability to deliver the vision and objectives of the GNLP.
- 4.9 The East of England Forecasting Model (EEFM) estimates jobs growth over the GNLP period and beyond. It is updated annually. The model's outputs are just one piece of evidence to assist in making strategic decisions. The model is robust but, as in all models, forecasts are subject to margins of error which increase at more detailed geographical levels. It is based on observed past trends which reflect past infrastructure and policy environments. Relatively recent infrastructure or policy changes have not fed through into these trends. It can be characterised as a "business as usual" forecast.
- 4.10 The Greater Norwich authorities are committed to working together to deliver more jobs overall than forecast, and a greater proportion of higher value jobs. This is reflected in the City Deal which commits to facilitate 13,000 more jobs than the target in the JCS. Taking account of subsequent EEFM forecasts, the SHMA¹⁶ recalculates the impact of the City Deal and concludes that this equates to 45,390 jobs in the period 2015-2036.
- 4.11 The Employment, Town Centres and Retail study (GVA 2017) contends that "given the nature of the Greater Norwich economy it is unlikely 'business as usual' will be a true reflection of the future economy – as such an alternative growth scenario is required"¹⁷. This scenario looks in more detail at key economic sectors within Greater Norwich, local drivers, and the consequent prospects for growth. It concludes that there are good prospects to grow the local economy. The enhanced forecast would add an additional 44,000 jobs in the area between 2014 and 2036. This scale of jobs growth is a little lower than, but broadly consistent with, the City Deal and demonstrates that potential in high value sectors alone can deliver the majority of this enhanced growth.
- 4.12 The precise target for the GNLP will need to be calculated for the submission version so that the latest forecasts can be taken into account but currently the evidence suggests a target of around 45,000 jobs 2015-2036.

¹⁶ Paragraphs 5.16-5.26

¹⁷ Section 5 of the Greater Norwich : Employment Land Assessment

Options

Option JT1: Plan to deliver forecast jobs growth plus additional growth. This is consistent with the evidence and with our City Deal agreement with Government.

This is **the favoured option**.

Option JT2: Plan to deliver “business as usual” forecast growth only. This would be consistent with the GNLP’s vision and objectives in broad terms, but would not help facilitate additional City Deal related jobs growth and could thus diminish the area’s ability to fulfil its potential.

This is considered to be **a reasonable alternative**.

Question

3. Which option do you support for jobs growth?

Housing need

4.13 Additional housing is needed because:

- People are living longer with a tendency to smaller households. This increases the need for more houses irrespective of any growth in the population;
- More people are moving into the area, mainly from other parts of this country, both because of economic growth and for lifestyle choices;
- More people are in need of housing as not enough homes have been built in recent years leading to a significant housing shortage. This lack of housing delivery has led to the parts of the area having no “5 year land supply”, which has resulted in planning permissions being granted for housing in locations not promoted in current local plans;
- The housing shortage in Greater Norwich has a significant impact on the quality of people’s lives, particularly for younger people looking to set up home for the first time. It is important to note that Government policy aims to significantly boost the supply of houses for all in society.

4.14 Identifying the housing need for the plan requires the use of evidence and a clear methodology to be established. This part of the document seeks views on the proposed approach.

4.15 The NPPF¹⁸ states that local plans should meet their objectively assessed need (OAN) for housing, with sufficient flexibility to adapt to rapid change. The way OAN is measured is changing. Until recently Local Planning Authorities (LPAs) commissioned Strategic Housing Market Assessments to establish OAN and more detailed housing evidence. In September 2017 the Government issued a consultation on a draft standard methodology for OAN¹⁹. This is a simplified methodology based on household projections uplifted by a factor that reflects affordability locally.

¹⁸ Paragraph 4

¹⁹ [Planning for the right homes in the right places](#)

- 4.16 Evidence on the OAN for Greater Norwich had been established by the Central Norfolk Strategic Housing Market Assessment (SHMA) 2017 (see chapters 4 and 5 [here for the SHMA](#) and [here for the Supplementary Note](#) to the SHMA). As well as OAN, the report covers housing affordability and sets out the sizes, tenures and mix of housing required to meet needs. **The SHMA identifies that the OAN for Greater Norwich from 2015 to 2036 is 39,486 homes (1,880 per annum).**
- 4.17 **The Government's proposed standardised methodology suggests the OAN for Greater Norwich is higher at 2,052 per annum. The methodology can be rebased to the current monitoring year to give an OAN from 2017 to 2036 of 38,988 dwellings.** If a different approach is adopted by the Government the OAN figure could change during the plan making period. However, given the Government's clear intention, it is reasonable to base this local plan consultation on the draft methodology.

Calculating the housing numbers for the plan

- 4.18 The OAN is the starting point. Some local plans have a higher housing requirement than their OAN, for example because the area has to provide for unmet needs from surrounding districts, or a lower requirement because needs cannot be met within their boundaries for environmental or other reasons. The Norfolk Strategic Framework shows that there is no need for Greater Norwich to provide for unmet need from neighbouring districts. There is no evidence of any overriding reasons that prevent Greater Norwich meeting its own housing need.
- 4.19 The plan can provide for additional dwellings to support economic growth. The Government's draft standard methodology means the OAN already includes a significant uplift to address lack of affordability of around 400 dwellings per year (7,600 over 19 years). This uplift to support affordability also provides for homes to support other needs such as economic growth. The City Deal seeks to deliver an additional 13,000 jobs by 2031 on top of the 27,000 jobs planned for in the JCS. The SHMA calculates how many homes would be required in the GNLP to support this enhanced growth. A simple recalculation of the SHMA assessment to rebase to 2017 suggests that around 40,700 dwellings would be needed to support potential jobs growth (forecast growth plus City Deal aspirations). Therefore, the OAN of 38,988 dwellings provides for the majority of the additional housing growth required to support the City Deal, although around 1,700 further dwellings could be required. Neither the SHMA nor the standard methodology requires this additional growth to be included in the OAN. However, to support our City Deal and ensure economic potential can be met, the GNLP would need to allocate sufficient opportunities to allow for this additional housing growth to come forward.
- 4.20 Housing sites can take longer to come forward than expected. Consequently, it is essential to over-allocate to maximise the potential to deliver the housing that we need to tackle the housing shortage and to support economic growth. The extra allocation is known as a delivery buffer and is consistent with the NPPF requirement for flexibility²⁰.

²⁰ NPPF paragraph 14

- 4.21 A 10% delivery buffer on the 38,988 OAN established using the Government's methodology raises the plan provision to **42,887**. Taking account of existing commitment in April 2017 of 35,665 homes, this means that the GNL P has a **housing allocation requirement** to provide land for **7,222 homes, rounded to 7,200**.
- 4.22 A delivery buffer lower than 10% would make it much less likely that needs would be met. A higher figure might be expected to increase the likelihood that housing need would be delivered, but it would also increase uncertainty for both housing developers and infrastructure providers, potentially risking delivery.
- 4.23 Based on recent trends and projected future delivery, it is estimated that an additional supply of up to **5,600** dwellings could be provided during the plan period on "**windfall**" sites. These are sites which are not allocated through the plan. Windfall development often takes place on small scale non allocated sites or as higher than expected numbers on commitments. It can also include some larger scale sites and office-to-residential conversions allowed under permitted development rights. The actual sites that will come forward and the precise scale of delivery is unpredictable but it is reasonable to assume that windfall will provide an extra source of housing supply which will assist in ensuring the area's housing needs are met. Therefore the 10% delivery buffer provided by allocations could rise to as much as **24%** if projected levels of windfall development are delivered.
- 4.24 Windfall development is a good source of small sites that can support small builders and aid overall delivery to ensure housing needs are met. The GNL P could include policies to encourage rural windfall (see question 43) and this would make it even more likely that the allowance is met or exceeded.
- 4.25 The additional plan provision and windfall development provides the flexibility to enable enough additional growth to come forward to fully support the jobs growth sought through the City Deal.

Questions

4. Do you agree that the OAN for 2017-2036 is around 39,000 homes?
5. Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?
6. Do you agree that windfall development should be in addition to the 7,200 homes?

Delivering Infrastructure

- 4.26 Housing and jobs growth needs to be supported by the appropriate infrastructure, when it is required, to meet the needs of new and growing communities. Fears that new infrastructure will not be provided are often voiced as reasons for opposing growth.

- 4.27 Ensuring new infrastructure needs are met requires a co-ordinated approach between a range of organisations, authorities and providers. Demonstrating such co-operation is necessary to ensure a sound plan.
- 4.28 Current policy on implementation²¹ focuses on:
- Securing the provision of infrastructure and investment to support growth;
 - Maximising the contribution of existing funding sources and investigating the scope for new ones;
 - Co-ordinating the investment programmes of other public authorities and understanding the capital investment programmes of utility providers;
 - Ensuring co-ordinated and timely implementation of infrastructure in line with development and regular review of the delivery programme;
 - Delivering affordable/supported housing; and
 - Identifying essential infrastructure including: transport, , social infrastructure, local/renewable energy generation, water conservation, Sustainable Drainage (SuDS), strategic sewers, open space and green infrastructure, utilities, street furniture and public art.
- 4.29 This approach is supported by a delivery plan that identifies the key infrastructure requirements and a time period for delivery to support growth to 2026.
- 4.30 Current planned growth is dependent on the completion of strategic infrastructure improvements including the NDR and improvements to the A47 at Thickthorn (the A11/A47 junction), along with the completion of dualling between Dereham and Acle. Work is progressing on these schemes, with the NDR to be completed in early 2018 and the A47 improvements planned to start in 2020. These improvements may provide growth opportunities.
- 4.31 The Greater Norwich authorities all charge the mandatory Community Infrastructure Levy (CIL) on relevant developments. As part of the City Deal, the Greater Norwich authorities committed to pooling CIL income to create a substantial local growth fund for delivering infrastructure. The City Deal partners also have the ability to borrow up to £60 million against future CIL income to help forward-fund infrastructure.
- 4.32 Following consideration of the national CIL Review Panel's report, the Government's Housing White Paper (HWP) [*Fixing our Broken Housing Market*](#), published in February 2017, stated that there will be an announcement about the future of the developer contributions system (CIL and Section 106) in the Autumn Budget 2017. Given the uncertainty, the Greater Norwich authorities have not yet undertaken a review and update of CIL since originally adopting it. However, a review of CIL is a possibility dependent on Government announcements.
- 4.33 The revenue generated from development via planning obligations and CIL is sensitive to economic fluctuations; when economic downturns happen, they impact the development industry and the rate of delivery can fall steeply and take time to

²¹ Set out in JCS Policy 20

recover (as happened between 2008-2012). As most off-site infrastructure is at least part-funded through CIL, a slowing economy will lead to reduced CIL income and thus reduced ability to deliver infrastructure – although if development rates slow, then the need for new infrastructure may also be somewhat delayed.

- 4.34 In recent years greatly increased emphasis in national policy on development viability has led to a number of measures by central government to enable viability to be reviewed and s106 planning obligations renegotiated where necessary to ensure that a viable development can proceed.
- 4.35 The GNLP will look forward at infrastructure required to support the planned growth to 2036. There has been consultation with the major infrastructure bodies and, up to now, none have identified the need for further strategic improvements to support the overall scale of growth identified. The infrastructure requirements will vary depending on the distribution of growth and this evidence will need to be established once the range of growth options has been narrowed down. In turn the infrastructure requirements will provide valuable evidence to fine tune the exact distribution of the new growth.
- 4.36 It can be expected that over the timescale of the GNLP there will be further significant and wide-ranging changes to national planning policy. In addition, there will inevitably be changes in priorities and needs arising from technological changes. The key to a successful strategy for the GNLP relies on developing an implementation plan which is flexible and responsive enough to adapt to change.
- 4.37 The Greater Norwich authorities will continue to explore the feasibility of developing a Local Delivery Vehicle (LDV), which could have the potential to invest money in sites, forward-fund the installation of infrastructure to de-risk sites, and recoup the initial investment through the uplift in the value of the land, to then be deployed to another site or sites.
- 4.38 The Housing White Paper²² states that the Government is interested in agreeing “bespoke housing deals” with authorities which have “a general ambition to build”. This could involve the use of “planning freedom” powers introduced through the Housing and Planning Act 2016, the alignment of infrastructure spending, support from the Homes and Communities Agency (HCA) and various other measures. This too will be explored as a tool to assist with the delivery of planned housing.
- 4.39 Issues workshops took place in summer 2016, involving key stakeholders from the public, private and voluntary sectors, and parish council representatives – see [Appendix 8 of the November 2016 Greater Norwich Development Partnership meeting](#) for the full summary notes. There were a number of comments suggesting that the Greater Norwich authorities should take a more interventionist approach to help better ensure delivery of important housing sites – for example, through up-front delivery of key infrastructure.

²² HWP paragraph 3.33

Question

7. Are there any infrastructure requirements needed to support the overall scale of growth?

HOW SHOULD GREATER NORWICH GROW?

Existing Housing Commitment

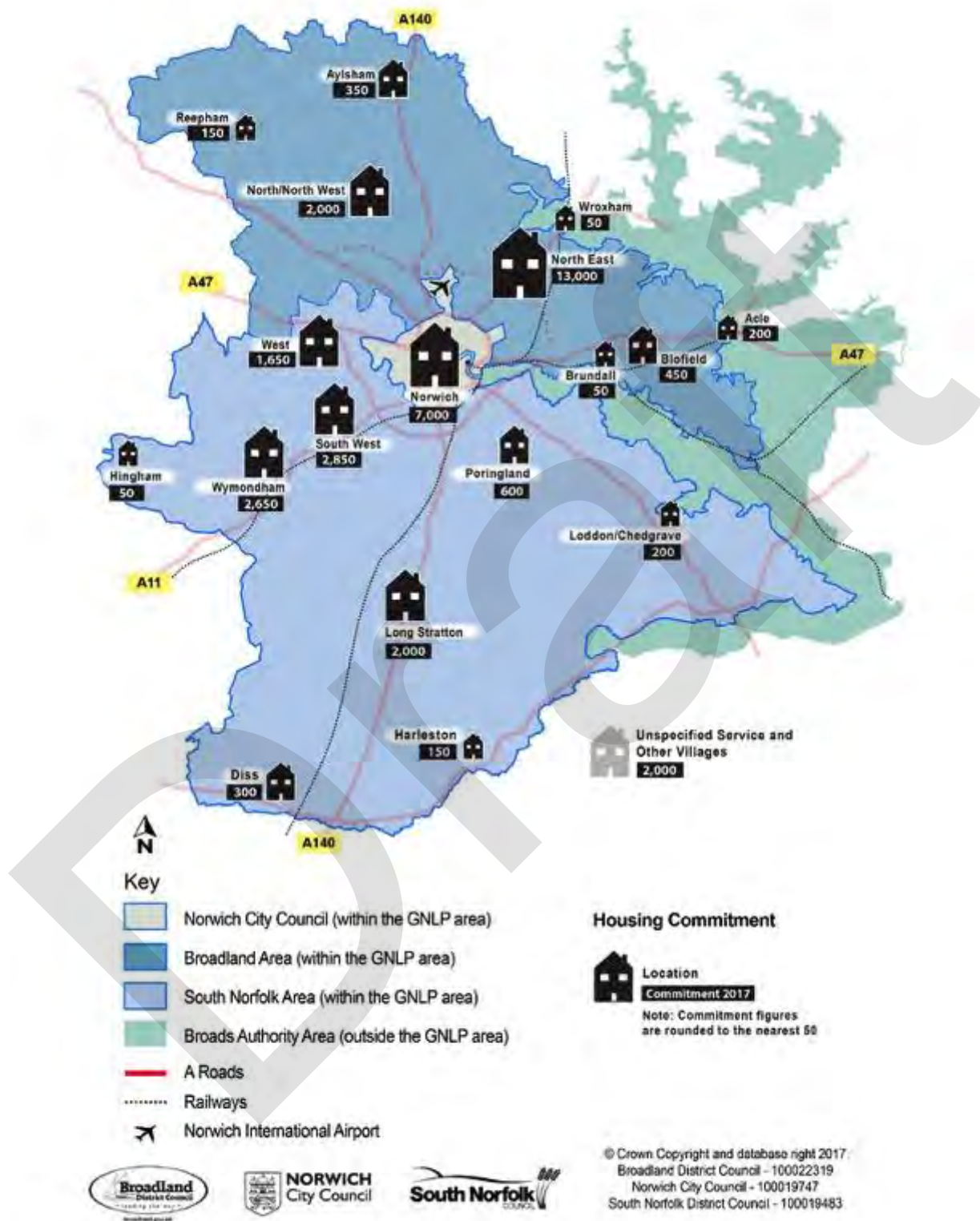
- 4.40 The locations for the majority of the GNLP housing growth have already been established through existing housing commitments²³. Broad locations for the housing commitment as of April 2017 are set out in figure 2 below. More detail on the housing commitment figures is in appendix 1. Our approach assumes that existing housing commitments can be delivered.

Question

8. Is there any evidence that the existing housing commitment will not be delivered by 2036?

²³ Housing commitments are sites which already have planning permission or have been allocated for housing development in existing plans.

Figure 2 Housing Commitment



Housing Growth options

- 4.41 In line with the NPPF, a **settlement hierarchy** will help shape growth options for identifying sites for the additional 7,200 homes we believe we require.
- 4.42 The hierarchy is a reflection of the range and type of services available in and accessible from communities and is a guide to sustainability. While the hierarchy is a starting point it does not, by itself, determine the scale of development that is appropriate in any particular settlement. This will take account of factors such as the scale, range and quality of local services; deliverability; location in relation to strategic services and job opportunities and local constraints and opportunities.
- 4.43 The current levels in the hierarchy set out in the JCS, are “Norwich Urban Area”, “Main Towns”, “Key Service Centres” (KSCs), “Service Villages”, “Other Villages” and “Smaller Rural Communities and the Countryside”.
- 4.44 The Norwich Urban Area is defined as the city council area plus the adjoining suburban and fringe parishes.
- 4.45 The Main Towns of Wymondham, Diss (including Roydon), Harleston and Aylsham have a good range of day to day services and local employment. Long Stratton is currently a KSC, but with the planned growth will become a Main town.
- 4.46 KSCs are larger villages with some services and employment. These are Acle, Blofield, Brundall, Hethersett, Hingham, Loddon/Chedgrave, Poringland/Framingham Earl, Reepham and Wroxham.
- 4.47 The current definition of Service Villages and Other Villages reflects their range of basic services. The authorities wish to consider whether a new “cluster” based approach would be better for village growth. Accordingly, proposals for a potential revisions to the settlement hierarchy in the GNLP are set out in paragraphs 4.152 to 4.160 below.
- 4.48 This section deals with how much overall growth should be focussed in all of the settlements at different levels of the hierarchy rather than where individual settlements should be placed in the hierarchy.

Baseline Assumptions

- 4.49 To meet national policy requirements to make the most efficient use of land, it is critical that the best possible use is made of brownfield land, which is mainly within Norwich and the urban fringe.
- 4.50 As well as supporting regeneration, such sites generally have better access to services, facilities, public transport, walking, cycling and employment opportunities. The failure to redevelop such sites would result in the need to identify additional greenfield sites elsewhere.
- 4.51 However, large numbers of brownfield sites are already committed through existing plans and the potential to identify additional sites is limited.

- 4.52 There is also a need to balance the amount of land required for housing with other uses, such as employment, other town centre uses and open space.
- 4.53 There are 7,000 homes already committed in Norwich. It is currently estimated that there is capacity on brownfield land for 1,500 additional homes in Norwich, along with 200 in the Broadland part of the urban fringe. Work is ongoing to see if any more brownfield sites can be identified for development.
- 4.54 The GNLP also needs to maintain and enhance the vitality of towns and villages by planning for new development appropriate to the local range of services and facilities. This growth will help meet the overall level of housing need across the area by ensuring diversity and competition in the market for land, and by allowing opportunities for small scale builders. It will also promote social sustainability, in some cases helping people to continue to live where they have grown up, and to provide choice. This is particularly relevant given that many of the existing housing commitments are in large sites around Norwich.
- 4.55 Taking account of the above, to achieve the requirement for 7,200 homes, the approach taken to identifying broad growth locations is:

Firstly, establish a baseline of 3,900 homes that:

- maximises delivery on previously developed land within Norwich and the built up areas of the fringe parishes (1,700 homes);
- maintains and enhances the vitality of smaller settlements by ensuring a minimum level of growth in Main Towns and Key Service Centres (1,000 homes), Service Villages (1,000 homes) and Other Villages (200 homes) or Village Clusters, some of which may be on previously developed land;

Secondly, identify alternative growth options for the remaining 3,300 homes in fringe locations, Main Towns, KSCs and Other Villages (or Village Clusters) - see figure 3 on page 28 and appendix 1.

Options for the distribution of the remaining growth

- 4.56 Six growth options are set out in this document to help to determine the most appropriate distribution of sites to be allocated for the additional 3,300 homes not in the baseline.
- 4.57 The growth options provide alternatives with varying degrees of concentration nearer Norwich, focus on transport corridors and dispersal around the area, including the potential for a new settlement.

- 4.58 New settlements built to Garden City principles²⁴ may offer an additional means of providing for growth and can, in the long term, create attractive new communities with a good range of services in accessible locations. This is because, if fully supported by the landowner, developer and local authorities, much of the uplift in land value resulting from the granting of planning permission can be invested in the new community itself.
- 4.59 As new settlements require significant investment in infrastructure, they can be challenging to deliver if effective mechanisms for securing the uplift in land values and to assist in providing infrastructure are not put in place. Therefore it is expected that a legal agreement would be required to ensure sufficient investment is available for any new settlements to be taken forward through the plan making process. If this is not achieved then there is the very real risk that CIL or other funding that would support potentially better value for money growth elsewhere could be diverted to a new settlement.
- 4.60 It is essential that locations for new settlements allow easy access to existing services in the short term until a critical mass of housing is achieved to allow a free standing new community with its own services to be established in the long term.
- 4.61 The absolute minimum eventual size for a new settlement is likely to be around 2,000 homes as this could support a primary school and a small range of local shops and other services. The larger a settlement grows to, the wider range of services it can support.
- 4.62 The time taken to bring new settlements forward means they could not provide significant amounts of housing before 2036, but would rather provide for an element of a long term strategic approach to growth in Greater Norwich.
- 4.63 Two sites submitted through the Call for Sites potentially provide the amount of land that could support a new settlement. These are at Honingham Thorpe (including land in Barford, Easton, Marlingford and Colton) and to the west of Hethel. The Honingham Thorpe site (site reference GNLP 0415 A to G in the Site Proposals document) is 360 hectares and is proposed for housing, employment and a country park. The other site (site reference GNLP1055 West of Hethel, Stanfield Hall Estate, Stanfield Road) is 364 hectares and is proposed to be a garden village with housing, hi-tech employment uses and community facilities. Site maps are available in the Site Proposals consultation document. Other potential sites may be identified, possibly through this consultation. Comments on new settlements can be made in response to question 13 below and through the Site Proposals consultation document.
- 4.64 A topic paper provides further detail on issues associated with the development of new settlements.

²⁴ See New Settlements topic paper

The Growth Options

4.65 It is important to note in relation to the six growth options that:

- Options are being tested through this consultation. Taking account of existing commitments in any individual settlement, there may be constraints e.g. in relation to infrastructure capacity and delivery, or environmental issues.
- Options refer to the total scale of additional growth in a location. To maximise delivery, where significant growth is proposed it may be spread over multiple sites. Larger sites may be allocated where early delivery can be demonstrated – for example where a site is an extension to one already being developed.
- Economic, housing need and housing delivery evidence, plus the high level of existing commitment in Broadland, suggests overall levels of growth should be higher in South Norfolk than Broadland.
- **The strategy chosen for the submission plan in 2019 may be an amalgam of the options. The options aim to provide a framework for considering different strategic approaches.**

4.66 The following table illustrates the scale of new growth and the new level of commitment that would result from each of the six options (in brackets). More detail on the options, including conceptual maps, is in appendix 1.

Figure 3 Strategic Growth Options

			Growth Options					
Location	Parish / Area	Homes Committed	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
Norwich		6,999	1,500 (8,499)	1,500 (8,499)	1,500 (8,499)	1,500 (8,499)	1,500 (8,499)	1,500 (8,499)
North East	Growth Triangle	12,516	1,200 (14,176)	1,200 (14,176)	200 (13,176)	200 (13,176)	200 (13,176)	1,200 (14,176)
	Thorpe St. Andrew	365						
	Elsewhere	95						
North / North West	Hellesdon	1,377	600 (2,619)	200 (2,219)	0 (2,019)	100 (2,119)	100 (2,119)	200 (2,219)
	Horsford	284						
	Drayton	285						
	Elsewhere	73						
West	Bawburgh	14	500 (2,125)	500 (2,125)	500 (2,125)	100 (1,725)	100 (1,725)	500 (2,125)
	Costessey	706						
	Easton	905						
South West	Cringleford	1,458	1,200 (4,028)	500 (3,328)	1,500 (4,328)	150 (2,978)	150 (2,978)	200 (3,028)
	Hethersett	1,295						
	Little Melton	68						
	Elsewhere	7						
Other Fringe Sectors		1,933	0 (1,933)	0 (1,933)	0 (1,933)	0 (1,933)	0 (1,933)	0 (1,933)
Main Towns		5,468	550 (6,018)	1,650 (7,118)	1,250 (6,718)	1,200 (6,668)	1,200 (6,668)	700 (6,168)
Key Service Centres		674	450 (1,124)	450 (1,124)	550 (1,224)	850 (1,524)	850 (1,524)	600 (1,274)
New Village(s)		0	0 (0)	0 (0)	500 (500)	0 (0)	500 (500)	0 (0)

Service and Other Villages or Village Clusters (including Countryside under option SH2)	1,060	1,200 (2,260)	1,200 (2,260)	1,200 (2,260)	3,100 (4,160)	2,600 (3,660)	2,300 (3,360)
Countryside	83	0 (83)	0 (83)	0 (83)	0 (83)	0 (83)	0 (83)
Total New Allocations Total Housing Provision (2017 to 2036)		7,200 (42,865)	7,200 (42,865)	7,200 (42,865)	7,200 (42,865)	7,200 (42,865)	7,200 (42,865)

Options

All of the six options are **reasonable alternatives**.

Analysis

Maximising the benefits of growth and minimising any resulting conflicts presents a number of choices which must be carefully balanced when identifying the most appropriate growth strategy for Greater Norwich.

While the options provide for only around 8% of the total housing allocations in the plan²⁵ which will carry forward existing commitments, the approach will have important long term implications for our urban and rural communities.

Access to services and jobs are key considerations, as is the need to ensure that housing is allocated in the locations most likely to deliver to meet housing need. Social, environmental and economic implications must all be considered in deciding the best growth strategy.

All the growth options aim to maximise growth on brownfield sites. However, it is important to note that large numbers of brownfield sites are already committed through existing plans in the area and the potential to identify additional sites is limited. The need to balance the amount of land required for housing and employment uses is a particular consideration in the city.

All the options also aim to enhance the vitality of towns and villages by providing them with “baseline” levels of growth. Different options provide different amounts of additional growth in towns and villages which could further assist in supporting vitality, though consideration must be given as to whether supporting services and facilities will be accessible in smaller settlements.

The size of allocations will also be a key consideration. Whilst larger sites can provide new services and facilities, recent experience has shown that they are more difficult to get off the ground. Smaller sites are often more likely to deliver and can support the vitality of existing settlements. Sites of less than 10 dwellings often do not provide affordable housing or the mix of housing sizes to provide the type of housing choice needed, particularly in our smaller communities. On the other hand, small sites offer the opportunity for self-build and for smaller builders which can increase the speed of housing delivery. Capacity in the industry will have to be significantly increased if very large numbers of small sites are allocated.

Options 4 and 5 are more likely to address the draft plan objective to deliver homes. This is because they provide for a much wider dispersal of development, and in doing so increase diversity, choice and competition in the market for land, which should be beneficial for delivery. They would also increase social sustainability by providing opportunities for people to continue to live in villages. Options 1,2 and 3 focus growth in locations that have significant outstanding commitment and have experienced delivery issues over the JCS period. Option 6 is somewhere in between.

²⁵ About 83% of the sites in the GNLP will be allocations carried forward from existing plans and the proposed baseline provides around 9% of the total.

However, Options 1, 2 and 3 perform better than alternatives 4 and 5 in relation to plan objectives that seek to improve air quality, reduce the impact of traffic, address climate change issues, increase active travel and support economic development. This a result of the better geographical relationship of development under these options to services, facilities, employment opportunities and sustainable transport options. Again Option 6 is somewhere in between.

Questions

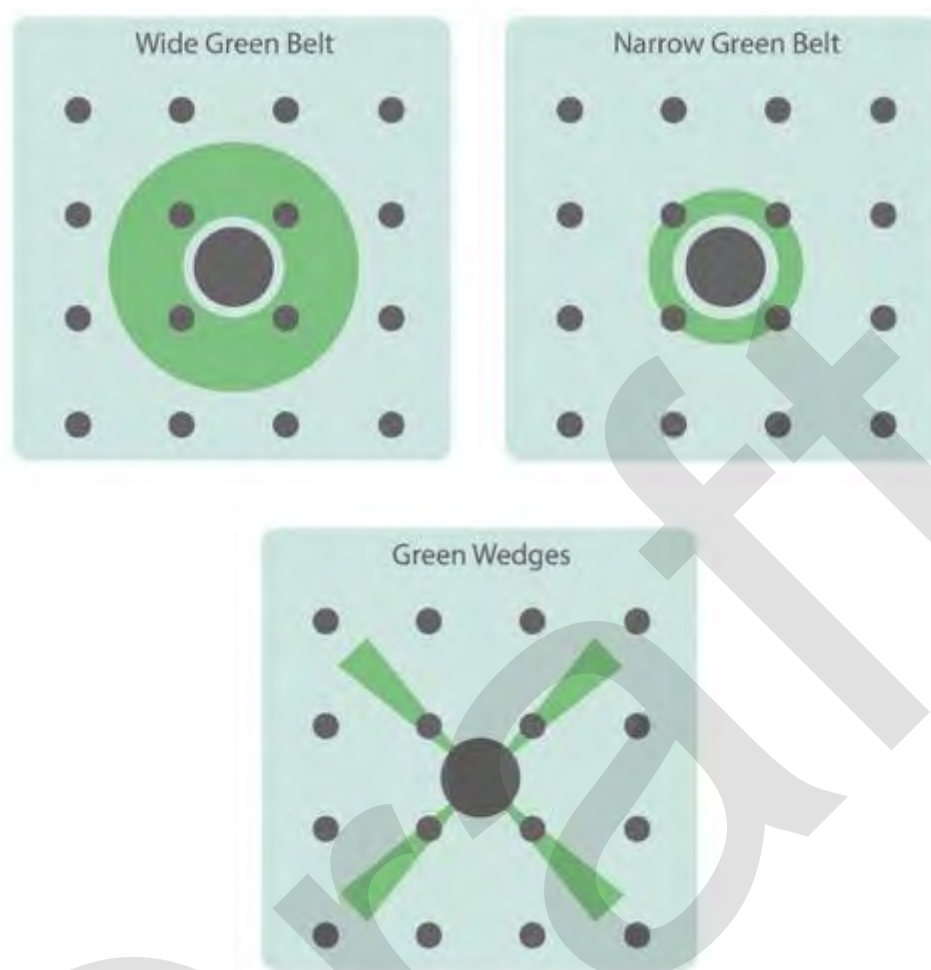
- 9. Which alternative or alternatives do you favour?**
- 10. Do you know of any infrastructure constraints associated with any of the growth options?**
- 11. Are there any other strategic growth options that should be considered?**
- 12. Do you support the long term development of a new settlement or settlements?**

Green Belt

- 4.67 CPRE Norfolk have launched a campaign for a Green Belt for Norwich.
- 4.68 Green Belts cannot be established as a means of restricting growth, but rather form part of a strategy for accommodating growth. They are established for the long term so a Green Belt would direct patterns of growth in Greater Norwich well beyond the end of this plan period.
- 4.69 The NPPF explains that Green Belts serve five purposes: checking the unrestricted sprawl of large built-up areas; preventing neighbouring towns merging; assisting in safeguarding the countryside; preserving the setting and special character of historic towns; and assisting urban regeneration. All of these purposes could be of relevance to Greater Norwich.
- 4.70 Critically, the NPPF says that new Green Belts should only be established in **exceptional circumstances**, for example when planning for new settlements or major urban extensions. The NPPF²⁶ also says “the general extent of Green Belts across the country is already established”, emphasising the exceptional circumstances required for a new Green Belt. If proposing a new Green Belt, the NPPF states local planning authorities should:
- demonstrate why normal planning and development management policies would not be adequate;
 - set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
 - show what the consequences of the proposal would be for sustainable development;
 - demonstrate the necessity for the Green Belt and its consistency with local plans for adjoining areas; and
 - show how the Green Belt would meet the other objectives of the NPPF.
- 4.71 Because they are long term, it would be necessary to demonstrate that future growth beyond 2036 could be accommodated if a Green Belt were established. So, for example, land around the urban fringe or other settlements might be excluded from a Green Belt to provide future options for development.
- 4.72 As illustrated in figure 4 below, Green Belts can take the form of continual belts around a city and its surrounding settlements of different scales or of green wedges.

²⁶ Paragraph 82

Figure 4 Green Belt approaches



4.73 We do not believe there is evidence to meet the exceptional circumstances required by the NPPF to justify the establishment of a Green Belt for Norwich. This is because:

- A **wide Green Belt** surrounding the Norwich urban area and inner settlements would have a significant impact on the delivery of sustainable development by restricting growth in those towns and villages that are closest to Norwich and are best placed to make the fullest possible use of public transport, walking and cycling. It would instead create a long term approach lasting beyond the plan period which focuses growth on areas further away from the city, generates longer journeys and could create affordability issues by restricting the supply of housing closer to the main areas of demand;
- A **narrow Green Belt** between Norwich and the first ring of larger settlements would prevent development between Norwich and its nearest towns and villages, but would increase pressure on those villages and towns in the longer term. This could have a significant impact on the form, character and appearance of those towns and villages, and the countryside that surrounds them;

- **Green Belt wedges** would most likely be based on the current plan approach of landscape protection zones around the Southern Bypass, and potentially the NDR, existing Strategic Gaps, the protection of river valleys and the preservation of undeveloped approaches to Norwich. This approach would reduce the impact on providing for sustainable locations for development. Since current local plan policies are directly aimed at, and have been broadly successful in, protecting these areas it would be very difficult to meet the Government's requirements set out in paragraph 4.73 above.

4.74 However, we will need to ensure that the strong protection policies for our landscape and environmental assets in current plans are carried forward and strengthened where necessary. This includes landscape protection zones around the Southern Bypass (and potentially the NDR), retaining existing Strategic Gaps, the protection of river valleys and the preservation of undeveloped approaches to Norwich as set out in option LA1 on page 104 of this document.

Question

13. Do you support the establishment of a Green Belt? If you do, what are the relevant “exceptional circumstances”, which areas should be included and which areas should be identified for growth up to and beyond 2036?

Norwich City Centre

Context

- 4.75 The NPPF promotes a town centres first approach, placing a strong focus on ensuring the vitality of centres.
- 4.76 Norwich's vibrant, attractive, historic city centre plays a pivotal role in the economic success of Greater Norwich. The city's significance as an economic driver and attractor of investment of skilled labour is extremely important to Greater Norwich's economy. The plan needs to strengthen these roles and support regeneration of the city centre as the strategic hub for shopping, leisure, culture and tourism, as an employment and education location and as an attractive place to live. A high quality city centre will continue to attract innovative knowledge based industries to the centre itself and to Greater Norwich as a whole.
- 4.77 In addition to identifying development sites, a range of other policies will be needed to help to attract investment. These will broadly continue the approach taken in the JCS. The approach will cover improvements to sustainable access, green infrastructure and the public realm, promotion of high quality development to protect and enhance the city's historic assets, support for the city's distinctive cultural, retail and leisure offer, improvement of air quality and promotion of the regeneration of brownfield sites to provide more jobs, homes and services.

- 4.78 Discussions at the issues workshops focussed on issues related to parking and recent changes to access to the city centre, which were largely welcomed. There was some support for restrictive retail policies, but some suggested policies should be more flexible, allowing restaurants and shops to locate within the city centre without restriction. The importance of the redevelopment of Anglia Square, possibly including some convenience offer, was also emphasised.

Defining the city centre area

- 4.79 The JCS currently defines a broad city centre with different areas for retail, leisure and office uses. The broad area lies inside the city walls, along with the area around Sainsbury's south of Queens Road, Riverside, the railway station and the area around Norwich City's football ground. This area is shown on the map in appendix 2. The most likely areas which could be included in the city centre are;
- Land to the west of the Inner Ring Road between Dereham Road and the Barn Road roundabout;
 - Land near the River Wensum to the east of Norwich City Football Club (Laurence Scott Electromotors, the Utilities Site and the Deal Ground).

Options

Option CC1 Retain the current definition for planning purposes of the city centre

Retaining the current city centre boundaries would encourage intensification of city centre uses within the currently defined area, enabling the centre to remain relatively compact, vital and vibrant and to continue to be well served by public transport.

A positive approach to identifying sites for city centre uses within the currently defined centre would enable appropriate sites for jobs, homes and services to be identified. In addition, the recent trend to make more intensive use of existing buildings, most particularly shops and offices, could be further encouraged.

Effective design policies could continue to ensure that intensification does not affect the historic character of the city centre. This could be done through continued use of the City Centre Conservation Area Appraisal, with updating it if necessary.

This is **the favoured option**.

Option CC2 Enlarge the area defined as the city centre

The limited amount of space and sites within the currently defined city centre may not be able to provide for the increased need for city centre functions identified in the evidence base without intensifying the use of land, which risks having a negative impact on the historic character of the city.

If locations cannot be identified for city centre uses such as retailing in the currently defined centre, there is a risk that more out of town development could take place which could undermine city centre vitality and viability in the long term. However, extending town centre uses could also encourage less intensive, car based, land hungry development which would be more difficult to serve effectively by public transport.

This is **a reasonable alternative**.

Question

14. Should the area defined as the city centre be extended?

Strategic city centre policy

4.80 Given the town centres first focus of national policy, the importance of the city centre to the economy of Greater Norwich as a whole and the enhanced potential for accessing external sources of funding when strategic planning policies for centres are in place, there is a clear need to have a strategic policy to guide development in city centre. The city centre policy should identify the amount of land needed for retail, leisure, and commercial development and allocate sites where possible. The policy should also include a **vision** for the city centre, with strategic priorities, to highlight aspirations and opportunities for the city centre to help increase Greater Norwich's profile at the national and international level. This vision would cover key objectives including:

- increasing employment, particularly in high value growing sectors;
- increasing the residential population;
- enhancing the retail offer;
- maximising the tourism and leisure opportunities;
- creating a regional learning and innovation centre;
- enhancing connectivity, providing vehicular access to jobs, homes and shops, a public transport hub for the area and a green, walkable, cycle friendly centre.

The vision would be in parallel to, and informed by, collaborative work with other key city centre partners, including the Business Improvement District (BID). By combining a strong vision with site allocations and working with key partners, the GNLP can assist in providing a common marketing narrative for the city centre which could help to secure investment, and provide a focus for public/private partnerships, enabling better use to be made of land and providing support for economic growth sectors. The vision could also provide the hook for supplementary planning documents to be developed for specific issues, such as providing a public realm and

green infrastructure strategy which could identify specific locations for improvements.

Question

15. Do you support the approach to strategic planning for the city centre in 4.80 above?

Specific city centre issues and questions

- 4.81 There are a number of specific city centre issues identified through evidence studies and experience of implementing the JCS which need to be addressed. These specific issues are followed by focussed questions below.

City centre offices

- 4.82 Office provision in the city centre has fallen by 8% since the start of the JCS planning period in 2008. The reduction is largely due to recessionary pressures and poorer quality office stock being converted to residential uses through changes in national planning policy making such conversions permitted development. There has also been limited market demand for speculative development of high quality offices, competition from new offices on the edge of the city and intensification of use in many remaining city centre offices.
- 4.83 The Retail, Employment and Town Centres Study, along with other evidence, identifies a more positive picture for the potential future of office based employment in the city centre. The enhanced growth forecast shows an estimated additional demand to 2036 for Greater Norwich as a whole of around 170,000 sqm of B1a (offices)/b (R+D) floorspace which rises to 340,000 sqm if windfall losses and churn are taken into account. While a significant amount of this demand will be accommodated at NRP and on out of centre business parks, a large proportion should be allocated in the city centre to help sectors based in the centre to grow, to realise sustainability benefits and achieve the economic benefits of agglomeration.
- 4.84 The evidence shows that the character of the city centre and its office stock is suited to the further development of knowledge intensive businesses. Such businesses typically form clusters in central locations which support face-to-face working and provide amenities. As a result, the main city centre growth sectors to 2036 are identified as digital, cultural and creative industries²⁷ and financial services (particularly “FinTech²⁸” businesses).

²⁷ Digital, cultural and creative industries are based on individual creativity, skill and talent, including publishing, art, all types of design, creative writing, film, broadcasting, fine art, advertising, public relations and marketing.

²⁸ FinTech companies leverage new technology to disrupt traditional financial services markets by creating new financial services, delivery channels, products and models. This includes any technological innovation in the financial sector, retail banking, insurance and investment.

- 4.85 Digital, cultural and creative industries are one of the fastest growing sectors in the UK, with Norwich having one of the most highly concentrated and diversified creative industry clusters, employing nearly 7,000 people in 2016. Many digital tech businesses are international in their outlook. Norwich University College of the Arts (NUCA), City College, the EPIC TV studios and incubation space for creative businesses have the capacity to stimulate development of the sector by providing creative expertise and skilled labour.
- 4.86 The strategic approach for the city centre therefore needs to play to its strengths by prioritising investment in these businesses to maximise job creation and support competitiveness.
- 4.87 Such an approach will also support the growth of other employment sectors which do not locate in city centres by providing a vibrant hub to attract business into Greater Norwich as a whole.
- 4.88 To enable the growth of a broad range of knowledge based and other businesses, both high quality grade A office space and more affordable and flexible “start-up” and “grow-on” facilities need to be provided in the city centre, potentially through public/private partnerships. These could either take the form of mixed use or stand-alone employment developments.
- 4.89 The current JCS identifies primary office development locations as Anglia Square, the St Stephens area, Barrack Street/Whitefriars, Barn Road, and the King Street/Rouen Road/Mountergate area. Other policies allocate sites for office uses and require some office provision in all developments.

Question

16. What should the plan do to reduce office losses and promote new office development in the city centre?

Retailing

- 4.90 Norwich is very high in the national retail rankings, at 13th. The high ranking is based on a strong and attractive retail offer and the city's large hinterland with a growing population, with the main competing centres being some distance away.
- 4.91 Due to its large size, the JCS divides the city centre into inter-dependent retailing areas with different functions. As well as the central Primary retail area with its focus on providing locations for large scale retailers, the key diagram identifies a number of shopping areas around the city centre as "Other shopping areas". These areas include:
- Specialist retailing areas at Norwich Lanes, Elm Hill and Magdalen Street, promoting smaller scale, independent retailers and tourism functions;
 - The Large district centres (LDCs) centred on Anglia Square and Riverside, which meet everyday shopping needs and a mix of other activities;
 - The Sainsbury supermarket at Queens Road;
 - The Cathedral Retail Park/ Barn Road – a warehouse, car based retail area.
- 4.92 Despite retaining a strong centre, rather than the JCS target of a 30,000 m² increase in comparison²⁹ floorspace to 2016, there has been a decrease of 3,500 m² (around 2%) since 2011. This is largely due to diversification of uses and an expansion of the leisure economy which has led to major growth in the number of cafés and restaurants at the expense of shops, especially in the secondary areas of the city centre.
- 4.93 At the same time there has been a significant rise in small scale retailing units selling everyday goods around the centre and significant growth of independent retailers, resulting in low vacancy levels in specialist retail areas. Large scale retail investors in the city centre have largely concentrated on the intensification of use of existing retail units rather than new build.
- 4.94 Sites to meet the planned growth of retailing were allocated in the Norwich Site Allocations Plan, while JCS and development management policies also promote intensification of uses in the city centre and expansion where necessary³⁰.
- 4.95 Recent GNLP evidence shows there is a degree of over-supply of floorspace in the short term but that around 11,000 square metres of additional comparison retail floor space will be required in the Norwich urban area by 2027. Forecasting

²⁹ The former definition of comparison retailing in the now superseded PPS7 was "the provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods".

³⁰ Remaining sites including allocations for retailing are at Barn Road car park, St Stephens Street and Westlegate. In addition there are mixed use allocations including the potential for some retail development at Ber Street; Rose Lane/Mountergate; King Street; Duke's Wharf ; Pottergate car park; Land to the rear of City Hall and Chantry car park.

floorspace need beyond 2027 is too unreliable to determine the need for allocations for the whole plan period.

- 4.96 National policy supports markets. Norwich market has been fairly successful in supporting different types of businesses and temporary markets are held elsewhere at times.

Question

17. What should the plan do to promote retailing in the city centre?

Leisure and the Late Night Activity Zone

- 4.97 In line with national trends, there has been significant growth in café / restaurant and bars/night clubs sector in the city centre since 2008. The current policy approach distinguishes between the early evening and the late night economy. It promotes extending early evening uses across the city centre, identifying a leisure area. As a means of managing potential conflict between late night activities and residential and businesses uses, a more restrictive approach to late night activities is taken, focussing them at Riverside, Prince of Wales Road and Tombland. While management measures have been introduced through licensing, the separation of residential and late night uses has become less enforceable due to changes in national policy, and the market for night clubs appears to be declining.

Question

18. Should the focus for late night activities remain at Riverside, Prince of Wales Road and Tombland or should a more flexible approach be taken?

City Centre Housing

- 4.98 The amount of housing in the city centre has risen significantly in recent years³¹. Delivery will be further boosted in the near future with a number of large scale allocated sites under construction or likely to commence soon.
- 4.99 Windfall is likely to provide a further contribution, possibly including dwellings provided through office conversions granted prior approval as permitted development. The level of this contribution will be partially dependent on the plan's approach to the loss of offices.
- 4.100 Housing is often provided as part of mixed use development and family housing has been specifically promoted on some sites to achieve a social mix. A number of sites allocated for mixed use development including housing have now been developed, or are being proposed for, new student accommodation.

³¹ There was a 45% increase in the number of homes in the city centre between 2001 and 2011, rising from 4,881 to 7,087, with more built since.

- 4.101 The GNLP will need to balance providing new homes in highly sustainable brownfield city centre locations with ensuring sufficient land is available for other city centre functions.
- 4.102 Housing commitment in the city centre on sites of 5 or more units, along with sites submitted through the Call for Sites (which are in some cases for an intensification of uses), are set out on in the Site Proposals document.

Question

19. What should the plan do to promote housing development in the city centre?

Air quality

- 4.103 Norwich city centre has a legally required Air Quality Management Plan. Recent road changes have been implemented to reduce to reduce through traffic and air pollution, with further measures planned such as improvements to public transport, walking and cycling facilities. The current approach in the JCS focusses growth in appropriate locations to reduce the need to travel and enable public transport use and development management policies require school and workplace travel plans, promoting alternative fuel use and supporting car sharing and car club schemes. This issue is covered further in section 6.

Cultural, Visitor and Education facilities

- 4.104 Cultural and visitor facilities, along with education, are planned as focuses for city centre development.
- 4.105 The NPPF identifies concert halls and conference facilities as main town centre uses. A JCS evidence study identified potential to provide a new medium scale conference and concert facility in the city centre, either by conversion or new build. Whilst there remains an aspiration in some parts of the community for such a facility, no market interest has been shown in developing a site.
- 4.106 A number of new hotels have opened in recent years and Norwich city centre is an important tourism destination.
- 4.107 New education facilities have been provided in the city centre for NUA, City College and free schools in recent years, largely through building conversions.

Question

20. How can the plan best support cultural, visitor and educational uses in the city centre?

Remainder of the Norwich Urban Area and the Fringe Parishes

- 4.108 Current policy for Greater Norwich³² covers a broad range of issues for the suburbs and built up parts of the fringe parishes, recognising that this area is home to a significant number of people, businesses and environmental assets. The area also provides vital links between the city centre and the surrounding area and opportunities for redevelopment, regeneration and enhancement.
- 4.109 Specific policies in the JCS and other plans cover areas identified for large scale growth such as the North East Growth Triangle.
- 4.110 Significant development and enhancements have taken place in the area in recent years. These include employment expansion (particularly at the NRP and Broadland Business Park), new community facilities (including those at Cringleford, Queens Hills and Costessey), green infrastructure improvements (such as at Mousehold Heath and the Yare Valley) and cycle and bus facilities. In addition, a number of new educational establishments have opened, including the University Technical College Norfolk at Harford Bridge and the International Aviation Academy adjacent to the airport. New schools have been opened and others have been improved.
- 4.111 Further projects are in the pipeline, particularly for the green infrastructure, cycling and bus networks.

Option

Option UA1 Policy for the remainder of the urban area and the fringe parishes

The favoured option is to continue the current approach of supporting:

- Regeneration of suburbs, with North, West and East Norwich being priorities;
- Well-designed development which improves townscape, retains character, improves gateways and increases densities where appropriate;
- Further development of the green infrastructure network, including protecting the landscape setting of Norwich and re-establishing heathland habitats;
- Retaining and improving local jobs;
- Promotion of Norwich as a learning city;
- Retention and enhancement of local services;
- Transport improvements (including measures associated with completion of the NDR such as area wide traffic restraint and improvements to the walking, cycling and bus networks).

³² JCS policy 12

Question

21. Do you support Option UA1 for the remainder of the urban area and the fringe parishes?

The Rural Areas

- 4.112 Whilst Norwich and its suburbs are clearly a very significant part of Greater Norwich, most of Broadland and South Norfolk is very rural in character. Market towns play a vital role in the rural economy, with most having a wide hinterland encompassing larger villages, smaller hamlets and open countryside. The services they provide (schools, shops, public transport, employment opportunities, healthcare, etc.) serve not only their own residents, but those for many miles around. These settlements are therefore “engines” of rural growth and prosperity and it is important that they are enabled to grow and thrive.
- 4.113 Smaller settlements, such as Key Service Centres (KSCs) and Service Villages, play a similar role to market towns, albeit at a smaller scale. Most current KSCs have a high school, and most Service Villages have a primary school, for example. Other Villages have fewer local facilities, and so tend to look to Service Villages, KSCs and Main Towns for some services.
- 4.114 In some rural parts of Greater Norwich, nearby villages can in effect “share” some services – the primary school may be in one village, a GP surgery in a second village and a food shop in a third. In this way, some “clusters” of villages may, together, provide a higher range of services than each does alone.

The Main Towns

- 4.115 The four Main Towns of Aylsham, Diss, Harleston and Wymondham play a key role in the life of the area, supporting the economy and providing jobs and services to wide catchments. The Main Towns already have significant commitments of 3,500³³ homes and with a good range of services all the Main Towns provide opportunities for further growth. The amount of additional growth in each will depend on the growth option chosen, delivery of existing commitment and locally specific infrastructure constraints and opportunities.

Aylsham

- 4.116 Aylsham has a vibrant town centre which supports a sizable number of retail and service businesses. The historic core of Aylsham is a conservation area with numerous listed buildings particularly around the Market Place and Red Lion Street, and north of the centre to Millgate.
- 4.117 The main access to Aylsham is via the A140, with the town centre by-passed to the east, west and south. Access to most of the remainder of the Greater Norwich area and beyond will be improved with the opening of the NDR.

³³ Excluding Long Stratton which will become a Main Town when planned growth is delivered

- 4.118 There are a number of recreational opportunities in or near the town including a recreation ground on Sir Williams Lane, a new football facility at Woodgate Farm, the Bure Valley Way, the Marriotts Way and facilities at Blickling Hall. New development is likely to be able to support additional recreational facilities.
- 4.119 Blickling Hall, with its 384 hectares of historic parkland and woodlands, is one of the wooded estate lands which characterise much of the landscape around Aylsham. The Bure river valley forms a second landscape character area which limits expansion to the north and east, while there are fewer constraints to the west and south of the town.
- 4.120 Aylsham has seen a significant number of homes built since 2008. Current commitments total 350 homes, with the development of allocated sites progressing well. There is continuing strong market interest in developing housing in Aylsham. Five proposed housing sites have been submitted around the town through the Call for Sites, totalling 58 hectares in area.
- 4.121 The 55 hectare Dunkirk Industrial Estate lies to the north east of Aylsham and includes two long term allocations. There has been limited new development on these in recent years and speculative development is considered unviable.
- 4.122 There is a good range of services and facilities within the town including primary and secondary education. There are two GP surgeries and a dentists in Aylsham, all of which are still accepting patients.
- 4.123 In the past waste water disposal issues have been identified as having the potential to constrain further large scale growth at Aylsham as it is located close to internationally designated wildlife habitats in the Broads. Recent work with the Environment Agency and Anglian Water in connection with planning permissions and allocations in Aylsham has shown that bespoke solutions for water management are suitable for the current amount of commitment, but the capacity for growth could be limited.

Diss

- 4.124 Diss is at the southernmost part of the GNLP area on the border with Mid-Suffolk. It is close to the crossroads of the A140 and A143 and is on the Norwich to London railway line. Much of the older historic development of the town has been along Victoria Road, parallel to the River Waveney, with the settlement having subsequently developed northwards. The built up area around Diss also extends into the adjoining parish of Roydon, which is itself a Service Village.
- 4.125 Diss has an attractive conservation area at its core, with an exceptional concentration of listed buildings. As well as including the core of the town centre, the conservation area extends around a series of particularly important and distinctive open spaces at: The Mere and adjoining Diss Park; the Parish Fields;

Mount Street Gardens; Rectory Meadow; and Fair Green. A separate conservation area covers an area of Victoria Road.

- 4.126 To the south of the town is the River Waveney which is a natural restriction on growth in that direction. To the east of Diss the landscape and tributary streams of the Waveney potentially limit expansion in this direction.
- 4.127 The commitment for Diss and Roydon is 319 homes. Diss has experienced steady growth over recent years. There are no known barriers to the delivery of the current commitments, which are expected to be completed by 2020, indicating that there would, in housing market terms, be scope for early delivery of additional sites. Fourteen proposed housing sites have been submitted around Diss and Roydon through the Call for Sites, totalling 51 hectares in area.
- 4.128 Traffic issues have long been a significant local concern. The scale of growth in the town will be partly dependent on how additional pressure on the historic town centre could be absorbed, both in terms of traffic capacity on the A1066 which runs through the town from west to east and also the ability to serve any additional development.
- 4.129 Relative to its size, Diss offers a wide range of employment opportunities, with two significant employment areas close to the station. The current local plan allocates a total of 15 hectares of employment land, a mixture of new allocation and already permitted or allocated sites. There are no known barriers to the delivery of the current commitments, although the town is close to the Mid-Suffolk Business Park at Eye Airfield, where land is allocated for in excess 100 hectares of employment, and which could affect the overall market in the area.
- 4.130 Diss has the second largest number of shops and services in Greater Norwich after Norwich. These serve a wide hinterland in the south of Norfolk and the north of Suffolk. Diss High School Academy includes a sixth form and there are no known capacity issues in terms of accommodating the current growth of Diss and the surrounding villages. The two GP practices in Diss are currently accepting new patients, as is one of the dental practices.
- 4.131 There is a good range of community facilities within the town including the leisure centre (with gym and swimming pool), library and community and arts venues such as the Corn Hall and the Youth and Community Centre. Recreation facilities are provided at the Sports Ground with dedicated facilities provided by the larger sports clubs at Diss Town F.C. and Diss R.F.C. at Roydon. However, if identified for large-scale development detailed investigation would be needed into what facilities could be expanded, and the impact of nearby smaller settlement that rely on Diss.
- 4.132 With its employment opportunities, good transport links and extensive hinterland Diss could sustain further development. However, the amount of growth at Diss may be limited by its road capacity and landscape issues.

Harleston

- 4.133 Harleston is in the south of the GNLP area, bordering Mid-Suffolk. It is close to, and primarily accessed by, the A143. Harleston is an historic market town and employment centre serving a relatively wide local catchment. It is a compact town set between two river valleys, with the River Waveney providing the setting to the south of the town.
- 4.134 The town centre, which contains a number of former coaching inns and courtyards, is a conservation area. Residential estate development outside the centre has incrementally increased the population of the town, though it remains compact. The A143 to the south and east constrains growth in those directions. Starston Beck and a sewage treatment plant to the north of the town also form growth constraints, while there are fewer constraints to the west.
- 4.135 The commitment in the whole parish of Reddenhall with Harleston is 157 dwellings. Market interest in Harleston has been limited with three proposed housing sites submitted around the town through the Call for Sites, totalling just 2 hectares in area.
- 4.136 The centrally located supermarket, the strong independent retail offer and the distance from other market towns mean that Harleston is likely both to continue to support a fairly wide local catchment for day-to-day shopping needs and to draw day visitors from further afield for leisure shopping trips.
- 4.137 Traffic issues and parking are a significant local concern. The scale of any additional growth in the town will need to take account of how additional pressure on the historic town centre could be addressed. Surface water flooding has also been an issue in the town centre.
- 4.138 The leisure centre, church, community hall, school and GP practice are all within close proximity of the town centre. The GP practice and the dentist are currently accepting new patients. Capacity to extend the primary school and the high school has not been confirmed, but as the high school is on the edge of the built-up area, expansion may be possible.
- 4.139 The potential for additional expansion may be limited by the likely need for a new water supply to serve additional growth and the limited number of submitted sites.

Wymondham

- 4.140 Wymondham is the largest settlement in the GNLP area outside Norwich and one of the main towns on the Cambridge-Norwich Tech Corridor. Due to its location and wide range of services and facilities the town has experienced steady growth over recent years.

- 4.141 Wymondham is currently the largest South Norfolk growth location. The parish, which includes the smaller settlements of Sutton, Silfield and Spooner Row, has an outstanding commitment of 2,674 dwellings. All of the main committed sites are have commenced development and are due to be completed by 2026. Despite some significant infrastructure requirements, such as improvements to access under the railway bridge, there are no known barriers to the timely completion of this development. Twenty-five proposed housing sites have been submitted around the town through the Call for Sites, totalling 593 hectares in area. In addition, a site for a new settlement between Wymondham and Hethel of 364 hectares been submitted for consideration (see paragraph 4.63).
- 4.142 The location of the town and the high-quality of services (especially schools) means housing market is strong, as exemplified by both allocated and non-allocated sites being developed currently and in recent years. Constraints to further large-scale housing include:
- secondary school capacity;
 - the setting of the Grade I listed (and nationally significant) Wymondham Abbey;
 - the protection of the setting of the town, particularly the character of the river valleys and maintaining the separate identities of the settlements on the A11 corridor; and capacity to expand the town centre.
- 4.143 A new primary school is proposed as part of the South Wymondham development, replacing the existing Browick Road School. However the continued growth of the town is likely to require further consideration of primary school provision.
- 4.144 Wymondham High School Academy is on a 'land-locked' site; the school has a development plan which maximises the potential of the existing site to accommodate the majority of planned development to 2026, however beyond this there are critical issues in relation to secondary school capacity which need to be addressed before any further growth is considered. Additional secondary school provision exists at Wymondham College, Morley, south of the town. Whilst there is no immediate capacity at the school, it is on a site where additional space could be provided. However, depending on the sites chosen for growth at Wymondham, the College could be a considerable distance from new housing, and distant from other services, facilities and employment. At present the admissions arrangements for the College are different to other secondary schools which could also complicate the situation.
- 4.145 The historic core of Wymondham has an extensive conservation area with a large concentration of listed buildings, centred on the Market Cross. Particularly important to the townscape are the setting and views of the grade 1 listed abbey. The development of Wymondham, predominately to the north and east of the historic centre, means that from the Tiffney Valley, Wymondham still has the

‘sense of a small historic town set in a rural landscape³⁴’. To the north and east of the town centre there are large areas of estate-scale development from the mid-20th century onwards, which is still continuing today, as well as large commercial and employment buildings, particularly around Gateway 11.

- 4.146 Wymondham is close to the expanding employment area at Hethel. Improved connectivity between Wymondham and Hethel is a key area for improvement. A 20 hectare allocation has been made at Hethel specifically for ‘uses associated with, or ancillary to, advanced engineering and technology based business³⁵’. The allocation relates to the existing businesses at Group Lotus and Hethel Engineering Centre.
- 4.147 The historic pattern of growth means that there has been little pressure on the countryside between Wymondham and Spooner Row; conversely there has been significant pressure on the remaining countryside between Wymondham and Hethersett, leading to the designation of this area as a Strategic Gap. The gap also includes the historic Kett’s Oak.

Long Stratton

- 4.148 It is anticipated that Long Stratton, which is currently classified as a Key Service Centre rather than a Main Town, will be re-classified as a Main Town once planned growth of around 2,000 homes takes place as it is anticipated that there will be a consequent growth in services. However, the potential for additional growth beyond that proposed through the AAP could be limited by waste water treatment issues. Two sites have been proposed in Long Stratton through the Call for Sites totalling 11 hectares.

Question

22. Do you know of any specific issues and supporting evidence that will influence further growth in the Main Towns?

Settlement Hierarchy

- 4.149 The Greater Norwich settlement hierarchy will group places together according to the availability of services and facilities, access to employment and opportunities for sustainable and active travel. Places that have similar characteristics are grouped in the same level of the hierarchy. In this way, the hierarchy helps to ensure that growth is distributed according to the range of supporting services and infrastructure that are available in a particular location.
- 4.150 This approach is consistent with the NPPF which favours prioritising growth in settlements where it is supported by existing services, facilities and infrastructure,

³⁴ Wymondham Area Action Plan paragraph 2.6

³⁵ South Norfolk Local Plan, HETHEL1

has the strongest links between homes and jobs and where opportunities for sustainable transport are maximised.

- 4.151 In order to maintain the vitality and viability of settlements and enhance choice and competition in the market of land for housing across Greater Norwich, it is however important that growth is distributed across the whole of the hierarchy, not just in those places at the top of it. Options for the distribution of growth to different levels of the Settlement Hierarchy are set out in paragraphs 4.65 to 4.66 of this consultation document.

Options for Defining the Settlement Hierarchy

- 4.152 A settlement hierarchy is identified in current JCS policy.

- 4.153 The existing hierarchy has six tiers:

1. Norwich Urban Area
2. Main Towns
3. Key Service Centres
4. Service Villages
5. Other Villages
6. Smaller Rural Communities and the Countryside

- 4.154 The top three tiers have well defined criteria which it is not proposed to change. However, in order to enable more growth to support the social sustainability of smaller villages and the countryside, we are considering combining tiers 4 to 6 of the hierarchy so that they become a single tier, "Village Clusters".

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

- 4.156 As part of the possible changes to the settlement hierarchy, we are also considering changing the title of tier 3 from Key Services Centres to Service Centres.

- 4.157 Under either option, additional growth could come from windfall development, the scale of which will depend on the approach taken (see options AH7 and 8).

- 4.158 The two **reasonable alternatives**, as set out in detail in figures 5 and 6 below, are:

Options

SH1	Have a 6 tiered hierarchy This would broadly be a continuation of the current approach, with some changes in the detail for tiers 4 to 6. The amount of growth that would take place in the different tiers of the hierarchy would be dependent on the scale and range of services.
SH2	Have a 4 tiered hierarchy including Village Clusters as tier 4. This would be a new approach. While tiers 1 to 3 would be the same as Option SH1, all remaining parishes below tier 3 would be amalgamated into Village Clusters.

Figure 5 Proposed settlement hierarchy – Option SH1

Hierarchy tier	Locations and settlements	Criteria and growth considerations
1. Norwich Urban Area	Norwich, the built-up parts of the fringe parishes of Colney, Costessey, Cringleford, Trowse, Thorpe St Andrew, Sprowston, Old Catton, Hellesdon, Drayton and Taverham and the remainder of the Growth Triangle.	<p>Defining criteria Access to a full range of high level and day-to-day services and employment opportunities.</p> <p>Growth considerations Therefore suitable for infill (within defined development boundaries) and housing allocations, the scale of which would be dependent on site availability, the growth option chosen and local environmental and infrastructure considerations.</p>
2. Main Towns	Aylsham, Diss (including Roydon), Harleston and Wymondham	<p>Defining criteria Local access to range of day-to-day services and employment (schools; healthcare facilities; retail, including a supermarket; comparison goods shopping; a range of employment; other services; and frequent public transport).</p> <p>Growth considerations Therefore suitable for infill (within defined development boundaries) and housing allocations, the scale of which would be dependent on site availability, the growth option chosen and local environmental and infrastructure constraints.</p>
3. Key Service Centres	Acle, Blofield, Brundall, Hethersett, Hingham, Long Stratton, ³⁶ Loddon/Chedgrave, Poringland/	<p>Defining criteria Local access to some services and employment opportunities (a primary school; an accessible secondary school; healthcare facilities; day-to-day retail and services; local employment; frequent public transport).</p> <p>Growth considerations</p>

³⁶ As stated in paragraph 4.45 and 4.148, Long Stratton is currently a KSC, but with the planned growth it is anticipated that the consequent growth in services will make it a Main town

	Framingham Earl, Reepham and Wroxham	Therefore broadly suitable for infill (within defined development boundaries) and housing allocations, the scale of which would be dependent on site availability, the scale and range of local services (higher levels of growth would tend towards locations with a secondary school); the growth option chosen; access to Norwich; and local environmental constraints.
4.Service Villages	See Appendix 3	<p>Defining Criteria</p> <p>A Service Village must have:</p> <p>Access to four key services (accessible primary school³⁷, village hall, food shop and journey to work by public transport).</p> <p>Or</p> <p>Availability of at least six services from a menu of 12, which must include an accessible primary school. The other services are: post office, village hall; food shop; pub; pre-school facilities; petrol station; outdoor recreation; community groups; employment; healthcare facility; journey to work by public transport.</p> <p>Growth considerations</p> <p>Service Villages would be suitable for:</p> <ul style="list-style-type: none"> • infill within (potentially enlarged) development boundaries; and • Housing allocations, the scale of which would be dependent on the growth strategy chosen, the scale and range of local services and the relationship of the village to a Service Cluster (including access to services in the Norwich Urban Area).
5.Other Villages		<p>Defining criteria</p> <p>Has a basic range of services. This is generally a primary school and village hall, although regard will be had to a range of other services.</p> <p>Growth considerations</p> <p>Suitable for infill development within a defined development boundary and, where there is an accessible primary school, small scale housing allocations. Larger allocations may be considered where the village forms part of a Service Cluster.</p>
6.Smaller Rural Communities and the Countryside		<p>Defining criteria</p> <p>Those areas, including villages, not in one of other categories of the hierarchy.</p> <p>Growth considerations</p> <p>Typically unsustainable for growth. Therefore, suitable only for farm diversification, home working, small-scale and medium-scale commercial enterprises where a rural location can be justified, including limited leisure and tourism facilities.</p>

³⁷ Within 2 miles with safe walking facilities

Figure 6 Proposed settlement hierarchy – Option SH2

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

Tier 4 Village Clusters

All remaining parishes would be placed into Village Clusters.

Questions

- 23. Do you agree with the approach to the top three tiers of the hierarchy?**
- 24. Do you favour option SH1, and are the villages shown in appendix 3 correctly placed?**
- 25. Do you favour the Village Cluster approach in option SH2?**
- 26. What criteria should be used to define clusters?**
- 27. Which specific villages could form clusters?**
- 28. How could growth be allocated between villages within a cluster?**

The Influence of the Norwich Urban Area

- 4.159 The concentration of jobs, services, facilities and travel options available in the Norwich Urban Area and its surroundings will continue to exert an influence on its surrounding area. In recognition of this influence, there has long been a policy approach called the Norwich Policy Area (NPA) which focusses development primarily in and around the urban area. This is consistent with the Core Principles in the NPPF³⁸. However, different approaches could also be consistent with national policy.
- 4.160 The NPA originated in strategic plans (the Norfolk Structure Plan, the East of England Plan and the JCS) to enable a co-ordinated approach to the allocation of sites in local plans produced individually by the three districts. In the JCS the NPA is described as “a long-standing local planning area used to ensure that growth needs arising from the Norwich Urban Area are addressed as close to it as possible.”

³⁸ NPPF Paragraph 17

- 4.161 The NPA plays a role in promoting the economic strength of Norwich and its surrounding area, demonstrating the collective importance of the area and showing the scale of housing and jobs growth with a focus on Norwich. It is also the same as the NATS area used for transport planning.
- 4.162 A number of ongoing changes in the area may affect consideration of whether there is a future role for the NPA. For example, the construction of the NDR, the changes to the office market in the city centre (particularly the loss of floor space), the City Deal and changes in working practices and commuting patterns enabled by advances in digital and other new technologies.
- 4.163 The GNLP could continue to identify an area in and close to Norwich in which the strongest influence of, and closest proximity to, the urban area is specifically recognised. This would provide continuity and could be useful in providing data for promotional purposes for economic development and in attracting investment.
- 4.164 However, as the GNLP will be a comprehensive local plan, encompassing both strategic planning policies and the allocation of sites, it is an option not to have a policy akin to the NPA, as the settlement hierarchy and allocations that will be included in this plan will determine the distribution of development.
- 4.165 Currently, the NPA is used as an area for measuring housing land supply, with the remaining parts of Broadland and South Norfolk treated as two separate areas. The NPPF requires needs to be met within the Housing Market Area (HMA). The SHMA identifies HMAs based on commuting patterns and migration. The whole of Greater Norwich and parts of Breckland and North Norfolk comprise the Central Norfolk HMA. The SHMA also identifies a Core Area as a functional HMA which is somewhat larger than the NPA but smaller than Greater Norwich. However, none of the other settlements in the surrounding area are sufficiently self-contained to establish separate functional housing market areas; they each have well-established links with the Norwich Core HMA in terms of both migration and travel to work.
- 4.166 On the basis of the available evidence, the SHMA concludes that the actual HMA is a geographically larger area than the Core Area and that an HMA based on the three Greater Norwich authorities would satisfy the requirements for defining a functional housing market area³⁹. As the NPA is smaller than the Core Area it can also be considered too small to be an HMA.
- 4.167 The Government's proposed methodology for calculating housing need is entirely predicated on establishing need at the level of the local authority. It supports joint plans. These should use the proposed approach to produce a single assessment of

³⁹ SHMA pages 137-138

the housing need for the area as a whole based on the sum of the local housing need for each local planning authority.

4.168 Based on the evidence of the SHMA, and existing and emerging national policy, retention of the NPA or a similar area for measuring 5 year land supply is considered to be **unreasonable**.

4.169 If the GNLP were to have a Norwich centred policy area for other purposes, it could be based on the current NPA boundary⁴⁰ or could be modified to different boundaries.

4.170 Having regard to the above text, both retaining and not having a Norwich centred policy area are considered to be **reasonable alternatives**.

Question

29. Do you support a Norwich centred policy area and, if so, why and on what boundaries?

⁴⁰ See map in appendix 4 of the [JCS](#)

SECTION 5 - IDENTIFYING DEVELOPMENT SITES

- 5.1 As well as providing a growth strategy, the plan will also need to identify the suitable sites to accommodate that development. To start the process of identifying the additional sites to fulfil requirements a 'Call for Sites' was held.

Call for Sites

- 5.2 The Greater Norwich authorities undertook the Call for Sites between 16 May and 8 July 2016, with sites submitted after this date up to 31 July 2017 also being assessed. Notification was sent to a range of individuals and organisations covering planning and land agents, known sites owners (including those who submitted their sites unsuccessfully for possible inclusion in the current local plans), local businesses who may have aspirations to expand and town and parish councils. The call also received extensive publicity in the local press. Approximately 600 sites were submitted. Whilst the call was for sites across the full range of uses, including 'Local Green Spaces', the submissions have predominantly been for additional housing or housing-led development. Additional employment land has been put forward in key locations, including further land at NRP, and the majority of larger scale proposals have suggested mixed uses i.e. housing with an element of employment and/or supporting community infrastructure and open space.
- 5.3 Although the submitted sites are widely distributed across the area, the distribution is not even. Few new sites have come forward within the Norwich City area itself, reflecting the fact that a large number of brownfield sites within the city are already permitted and/or allocated for redevelopment. For the Main Towns, the volume of land submitted ranged from less than 2 hectares at Harleston to over 593 hectares at Wymondham, with a wide range of sites also submitted across smaller settlements.
- 5.4 Until the distribution of growth is established it is not known to what degree the sites submitted actually fulfil the requirements in particular locations. As such, additional sites may be required in some locations (see 5.9 below).

Housing and Economic Land Availability Assessment (HELAA)

- 5.5 An initial assessment of all Call for Sites submissions that were received before 31st July 2017 have been carried out through a Housing and Economic Land Availability Assessment (HELAA). The methodology for the HELAA has been prepared and agreed by all of the Norfolk LPAs under the Norfolk Strategic Framework, and is available on the [GNLP website](#). The HELAA assesses the broad capacity of the sites, and is a desk-top exercise based around Red/Amber/Green (RAG) scores for a range of "Constraints and Impacts" associated with the potential development of those sites. The views of a range of technical stakeholders, such as Norfolk Wildlife Trust, Anglian Water, local authority Conservation and Environmental Health services, and Norfolk County Council's Highways, Ecology and Historic Environment services have been taken into account in the HELAA assessment. The HELAA uses RAG scores to

assess the suitability of the sites (for the uses proposed by those submitting the sites) and this is complemented by an assessment of their Availability and Achievability in order to draw a conclusion about whether the site has potential capacity. The full HELAA can be found on the GNLP website.

- 5.6 The HELAA indicates that relatively few sites have no capacity for development. Consequently, there is more than sufficient land to accommodate the required housing. **However, it should be noted that just because the HELAA identifies a site has capacity for development, this does not mean that it a suitable allocation site or would gain planning permission.**

Sites Proposals document and Response Form

- 5.7 As part of the GNLP consultation, all of the sites submitted to the councils before July 31st 2017 have been published for public consultation. A separate **Sites Proposals** document containing all of the sites has been produced. This document sets out the submitted sites on a settlement-by-settlement basis and is available on the GNLP website. Please use the bespoke sites response form to comment on any of the sites and/or the assessment of a site in the HELAA.
- 5.8 The parish maps also illustrate the existing committed sites; the GNLP is based on the assumption that these sites will be completed by 2036 (many much earlier than that).

Additional Sites

- 5.9 Whilst the 600 sites have already been submitted for consideration, these may not necessarily be the best sites, or in the right locations. If you have a site which has not already been submitted, and you wish to be considered, please complete the sites submission form and return it to the GNLP team before the end of the consultation (22 March 2018).

SECTION 6 – TOPIC POLICIES

THE ECONOMY

Context

- 6.1 There is significant potential for economic growth in Greater Norwich. The City Deal has been signed with Government to promote accelerated growth, the LEP's economic strategy identifies Greater Norwich as the region's main engine of growth and the Norwich Cambridge Tech Corridor initiative promotes further growth of high tech industries which are growing in significance nationally and internationally. In addition, Norwich is part of the "Fast Growth Cities" group⁴¹ whose ability to attract knowledge-based businesses puts them in a strong position to continue to grow in the future. Key growth sectors are the life sciences and biotechnology, agri-tech, food and drink, creative and digital industries and high-value engineering. Other industries including retailing, tourism and financial services, remain important to the area.
- 6.2 While economic growth will occur, changes in the way we work mean that there may not be a need to retain all the current employment land. This section therefore seeks your views on how the plan can best support economic growth.
- 6.3 The NPPF requires local plans to assist in building a strong competitive economy by setting out a clear economic vision and strategy for the area to encourage sustainable economic growth and address barriers to investment, including a poor environment or any lack of infrastructure, services or housing.
- 6.4 Policies should also be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances and there is a particular focus on the expansion of knowledge driven, creative or high technology industries.
- 6.5 In relation to employment land, the long term protection of sites allocated for employment use should be avoided where there is no reasonable prospect of a site being used for that purpose.
- 6.6 The NPPF also requires plans to ensure the vitality of town centres by promoting competitive town centre environments, setting out policies for their management and growth and allocating sites for town centre uses⁴².
- 6.7 In relation to the rural economy, local plans should support sustainable economic growth and a strong rural economy by taking a positive approach to the growth of rural businesses, agricultural businesses, tourism and leisure developments and support local services and facilities.

⁴¹ [Centre for Cities](#) - the other cities are Cambridge, Oxford, Milton Keynes and Swindon.

⁴² Policies should provide for the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres.

- 6.8 The Housing White Paper⁴³ states that economic development is dependent on housing need being provided for and that changes to the NPPF will be made so that non-strategic employment land that has been vacant for five years should be considered for starter home led development.
- 6.9 The current Greater Norwich policy approach⁴⁴ is wide ranging and covers a number of economic development issues, some of which are not directly related to land-use planning. It:
- seeks to develop the local economy in a sustainable way to support jobs and economic growth both in urban and rural locations. The strategy aims to provide for a rising population, develop Greater Norwich's role as an engine of the wider economy, facilitate forecast job growth potential and increase the proportion of higher value, knowledge economy jobs. At the same time, it aims to ensure that opportunities are available for the development of all types and levels of jobs in all sectors of the economy and for all the workforce;
 - requires sufficient employment land to be allocated in accessible locations and, consistent with the overall strategy, to meet identified need and provide for choice; and
 - includes policies to help address the needs of small, medium and start-up businesses; larger scale needs; to overcome constraints to the release and development of key sites; and to control other uses on employment land.
- 6.10 Through a number of measures, it also facilitates opportunities for innovation, skills and training; promotes tourism, leisure, environmental and cultural industries, and supports the rural economy and diversification.
- 6.11 Feedback from the Issues workshops highlighted the importance of early funding and delivery of infrastructure improvements to supporting economic growth and the need for a more flexible approach to economic development which recognises the difficulties of influencing where businesses wish to locate. The importance of the economic opportunities presented by connections to Cambridge and increasingly in the future to Great Yarmouth was also emphasised.
- 6.12 The draft vision for the GNLP promotes a strong economy for Greater Norwich and the economy objective is to support and promote the growth of an enterprising, creative, broad based economy with high productivity and a skilled workforce.
- 6.13 The plan will need to continue to provide a wide ranging approach to supporting economic development and growth.

⁴³ Paragraph 4.18

⁴⁴ In JCS Policy 5 and supporting development management policies

The supply of employment land

6.14 The area currently has around 340 hectares of undeveloped employment land that is allocated or permitted. The Employment, Town Centres and Retail study concludes that, even to support an enhanced level of employment growth, the overall need for land is significantly less at 114 hectares.

6.15 There are a number of issues to take into account when considering how much land should be allocated:

- There is a need for supply to exceed demand to provide choice and competition and to provide for the full range and scale of business requirements, and to ensure that there is a good distribution of local opportunities across the urban and rural area;
- Much of the available land is in extensions to strategic sites, building on success and providing long term certainty for investment extending into the future beyond 2036;
- Significant amounts of land are targeted at strategic needs and particular sectors (e.g. around the airport, at NRP, the Food Enterprise Zone and at Hethel);
- The long term success of the city centre as an engine of growth must be supported;
- The balance between city centre office development, which uses land more intensively and efficiently, and more expansive business parks;
- Too much allocated land could undermine growth by reducing certainty for developers and increasing the risk of investment in supporting infrastructure needed to bring sites forward;
- The HWP proposal that non-strategic employment land should be considered for Starter Homes led development may have a major impact.

6.16 Current larger allocations of undeveloped land are:

Site	Size	Note
Airport Business Park	35ha	An undeveloped area to the north of the NDR and east of the A140
Aeropark (a permission rather than an allocation)	40ha	Within the airport curtilage just south of the NDR
Rackheath	25ha	Within the northern part of the NEG, no specific site has been identified and the scale of growth could be reviewed through a master-planning process
Broadland Business Park (BBP)	15ha	Northern extension of BBP (Laurel Farm).
Broadland Gate	18ha	Next to BBP
NRP	40ha	Extension of the existing NRP
Longwater	11ha	Extensions to the existing employment area

Food Enterprise Zone	19ha	The FEZ is a wider area, mostly unallocated, but includes a site in Honingham, benefitting from a Local Development Order
Browick Road, Wymondham	22ha	A site on the eastern side of the town adjacent to the A11
Hethel	20ha	An extension to the existing Hethel Engineering Centre and adjacent to Lotus Cars

6.17 In addition to these large sites, there is also a wide range of smaller employment sites throughout the area.

6.18 Additional employment land has been put forward for inclusion in the GNLP. Significant proposals include:

- Land at Honingham/Easton which would extend the Food Hub either independently or as part of a new village;
- Land adjacent to the NRP. In particular, 64 hectares of land which wraps around most of the Norfolk and Norwich Hospital has been proposed for commercial and employment use (site GNLP 0331 in the Site Proposals document) – business, office, academic, medical and healthcare facilities. Some of this land might be logically needed for healthcare uses if the hospital wishes to expand at some point by 2036;
- Land at Wymondham/Hethel for a new village including a strategic employment site specialising in advanced engineering and technology.

Options

6.19 There is no evidence to justify increasing the overall supply of employment land. Further increasing supply for which there is no demand increases uncertainty, risking investment to bring sites forward. It also increases the risk of encouraging uses that will be damaging to the city and town centres.

6.20 While there is no overall need for additional land there could be a need for new allocations. Justification could include small sites to support housing growth or larger sites targeted at specific economic sectors.

6.21 Given the NPPF focus on retaining and enhancing “strategic” employment land, there is a need to identify such areas. Failure to do so could lead to the loss of strategic employment land, in full or in part, to housing or other uses over time, and would dilute the certainty for potential new occupiers that particular locations are available. It would also hinder the attractiveness for marketing purposes of Greater Norwich as a key employment location

6.22 Three **reasonable alternatives** have been identified for the supply of employment land:

Option EC1: Broadly maintain the current supply of employment land. While there could be some minor changes, currently allocated employment land would continue to be allocated, and land already allocated or developed for employment uses would not be identified for redevelopment for other uses e.g. residential. This could be an

appropriate strategy, but would run the risk of there being an excessive amount of land available, which might lead to pressure to “convert” some land to other types of use in an unplanned manner (i.e. through applications rather than the GNLP itself). This is considered to be **a reasonable alternative**.

Option EC2: Significantly reduce the overall level of supply while still maintaining choice and flexibility. As the principal of development is already established, employment land could be re-allocated for other uses (such as housing) rather than de-allocated. This is considered to be **a reasonable alternative**.

Option EC3: Develop a criteria-based policy allowing windfall development. This may be an appropriate policy choice alongside either EC1 or EC2 as it would provide flexibility. There is a possibility that locational requirements could change as new technologies develop in a rapidly changing economy. This is considered to be **a reasonable alternative**.

Questions

30. Which option or options do you support?

31. Which allocated or existing employment sites should be identified as strategic sites and protected?

32. Are there employment areas that should be identified as suitable for release for residential uses?

33. Are there any new employment sites that should be allocated?

Retail and Town Centre Policy

6.23 The NPPF requires a **sequential approach** to locate retail and other town centre uses within appropriate centres before edge or out of centre locations are considered.

6.24 The NPPF also requires the definition of a **hierarchy of “town” centres**. This helps ensure development of new retailing, services, offices and other town centre uses at a scale that is appropriate to the centre. The current levels of the hierarchy are:

1. Norwich City Centre (a nationally significant retail centre);
2. Town Centres, and Large District Centres within the Norwich urban area (these provide a relatively broad range of shops and services and function as a focus for the community and for public transport);
3. Large Village Centres and District Centres within the Norwich urban area (groups of shops usually containing at least one supermarket or superstore and non-retail service uses such as banks, building societies and restaurants);

4. Local Centres (small groupings of shops, typically comprising a general grocery store, and other small shops of a local nature).

6.25 The centres currently identified at each level can be found in JCS Policy 19. A new district centre on Hall Road, Norwich has recently been built. The NEGTS will be served by a single new district centre within the Beeston Park development.

Accommodating expenditure growth

- 6.26 The Employment, Town Centres and Retail study provides evidence that local rates of “special forms of trading” i.e. expenditure that is not spent in traditional bricks and mortar shops, is higher than the national average. It also advises that retail needs forecast beyond 2027 are unreliable. Based on local data on special forms of trading, the local plan would need to provide for new comparison goods floorspace of around 11,100 sq.m net in the Norwich Urban Area, 2,300 sq.m net in the South Norfolk rural area and 400 sq.m net in the Broadland rural area. Comparison goods are most non-food goods.
- 6.27 There is no quantitative need for any additional convenience goods (i.e. food and everyday items) floorspace in the Norwich urban area over the period to 2027. There is an over-supply in Aylsham and Harleston and therefore there is no quantitative need for any additional convenience goods provision in these two towns. For the other smaller centres there is a need for up to: 2,500 square metres net in Diss; 300 in Wymondham, 1,200 for small centres in rural South Norfolk and 900 in rural Broadland. Where there is no quantitative need there may be a qualitative need, for example to provide a small supermarket in an under-served area of new housing.
- 6.28 In accordance with the sequential approach this floorspace should be accommodated in appropriate town, district or local centres.

Options

- 6.29 While the development management policies documents currently have a sequential approach to new retail development, the strategic nature of the GNLP means that the issue should be covered in the plan. There is no evidence that the levels of the hierarchy are inappropriate but some centres may have changed their position in the hierarchy due to gains or losses of facilities. Therefore two reasonable alternatives have been identified:

<p>Option EC4: Maintain the current retail and town centre hierarchy.</p>
<p>The current hierarchy in paragraph 6.24 is considered to be a reasonable alternative.</p>
<p>Option EC5: Focus new development for retail of comparison goods primarily within existing town centres (i.e. levels 1 and 2 in para 6.24) with perhaps some out of centre allocations. Evidence suggests that there will be a significant growth in retail expenditure on comparison goods. It also indicates that the average turnover across Norwich city centre is lower than comparable centres such as Cambridge. The quality of the offer in the city centre also lags behind some competitor centres. However, there could be some scope for out of centre development in sustainable locations,</p>

particularly if there is limited physical scope within the city centre and market towns to accommodate further comparison goods expenditure.
This is considered to be **a reasonable alternative**.

Questions

34. Should the position of any of the centres in the retail hierarchy be changed?

35. Do any of the existing retail centres have scope to expand to accommodate further floorspace?

The rural economy

6.30 Current policy⁴⁵ supports the rural economy and diversification by promoting:

- the re-use of redundant non-residential buildings for commercial uses (including tourism and possibly affordable housing);
- farmers markets, farm shops and cottage industries;
- e-commerce in villages;
- development of a food hub;
- rural businesses including tourism.

6.31 Technological changes during the plan period that are difficult to predict are likely to have a significant impact on the rural economy. Question 39 below covers broadband.

6.32 A Food Enterprise Zone west of Easton and south of the A47 has been agreed by Government. This will enhance rural development through the growth of food and farming businesses, including encouraging greater collaboration with research and education institutions, particularly those at Easton College and the NRP. A Local Development Order (LDO) covering an initial 10 ha part of the Food Enterprise Zone was approved in 2017. This creates a simplified planning regime for agriculture related development.

Question

36. What measures could the GNLPP introduce to boost the rural economy?

⁴⁵ JCS policy 5

ACCESS AND TRANSPORTATION

Context

- 6.33 Access and transport is fundamental in day to day life. 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 infrastructure required to support the existing strategy will help support delivery of the growth proposed in the GNLP.
- 6.34 Section 4 of the NPPF covers transport issues. It⁴⁶ states that transport policies are important to achieving sustainable development, but that urban and rural areas can present different challenges. Patterns of development which facilitate the use of sustainable transport modes, reducing congestion and greenhouse gas emissions, are encouraged for local plans⁴⁷. It also states that infrastructure investment strategies to support the growth of airports and other large generators of traffic should be supported⁴⁸. Development should, amongst other factors, be located and designed to support public transport, walking and cycling, minimise conflict between traffic and cyclists/pedestrians and where possible incorporate facilities for ultra-low emission vehicles⁴⁹. All developments generating significant volumes of traffic should be required to provide a Travel plan⁵⁰.
- 6.35 Current Greater Norwich access and transport policy⁵¹ covers a number of separate areas, including strategic transport improvements (such as the Long Stratton bypass, NDR and various rail and airport improvements), encouraging walking and cycling, boosting broadband connectivity, and improving public transport to and from Main Towns and Key Service Centres. The policy supports the Norwich Area Transportation Strategy (NATS) and identifies this as the detailed means by which transport improvement across the urban area of Norwich will be developed and delivered. The policy identifies strategic improvements to better link the area with the rest of the county and beyond and promotes travel choice and sustainable modes. It also recognises that the area is a mix of rural and urban and access in which travel issues vary, with the use of the private car being particularly important to the rural economy.
- 6.36 Annual Monitoring Reports detail a variety of transport and accessibility indicators, including commuting mode breakdown (car, cycling etc), carbon dioxide emissions and access to housing and services. A number of other transport measures are monitored through NATS monitoring, although this does not necessarily take place every year.

⁴⁶ Paragraph 29

⁴⁷ Paragraph 30

⁴⁸ Paragraph 31

⁴⁹ Paragraph 35

⁵⁰ Paragraph 36

⁵¹ JCS Policy 6

6.37 The main transport and accessibility issues emerging from the Issues workshops were:

- There are merits to both concentration and dispersal of growth and the plan should promote a balanced mix of both;
- The A11 should be the focus of growth;
- There is a need to promote better rail connections to London and Cambridge;
- More should be made of the local rail network;
- There is a need to secure funding and delivery of transport infrastructure improvements to support growth;
- Norwich Airport is important to the local economy;
- Recent transport improvements in Norwich city centre were welcomed;
- There is a need to consider congestion on radial routes and Inner and Outer ring roads;
- Bus Rapid Transit and other bus improvement measures need to be made to support the services people need, including simpler cross-service ticketing;
- Buses need to be cheaper relative to parking and park-and-ride costs;
- Car use remains important in rural areas, but there is a need to provide better routes for walking and cycling to schools and for commuting;
- Growth should be located to support the viability of bus services; and
- Fast broadband connectivity is key for all parts of Greater Norwich, with rural areas particularly in need of speed improvements.

Strategic Transport issues

6.38 Strategic transport connections are important to the local economy and growth. The recognition of and support for such improvements in the GNLP can be of considerable assistance when funding bids are being proposed, as well as being potentially necessary to support the scale of growth proposed. The GNLP will therefore include a policy on supporting strategic improvements. The wording of the strategic element of the current JCS policy will need updating to reflect recent progress on the NDR and recent Government funding commitments for improvements to the A47. The Roads Investment Strategy has identified improvements at Blofield to North Burlingham, Thickthorn and Easton to East Tuddenham with these starting in 2020. In addition, the policy will need to recognise that the county council has identified **the Norwich Western Link** as one of its infrastructure priorities. As it develops, the GNLP will reflect progress towards delivery of the scheme.

Question

37. Are there any other specific strategic transport improvements the GNLP should support?

The Development and Implementation of Transport Improvements

- 6.39 NATS is founded on the principles of enabling growth through the provision of sustainable development and increasing accessibility through widening transport choice. NATS covers the wider urban Norwich area, so does not cover the whole of Greater Norwich. This reflects the areas of greatest transport concentration and pressure. Outside this area transport improvements are dealt with on a local basis.
- 6.40 While the GNLP will need to identify the strategic transport improvements necessary to support growth in the plan, smaller-scale area-wide transport improvements to manage the impact of growth and pick up existing traffic issues in Norwich built-up area will continue to be managed through NATS.
- 6.41 NATS is being reviewed alongside the development of the GNLP, with public consultation exercises taking place at the same time. There are very clear and obvious links between the GNLP and the review of NATS – different patterns of future growth will impose different transport pressures and transport improvements will need to be delivered in a timely way to support planned growth.

Promoting healthier lifestyles, sustainable travel choices and greater accessibility to broadband

- 6.42 National and local policy is to reduce reliance on the private car and to promote more sustainable and healthy travel choices. Other approaches than that would not accord with local and national policy and are therefore **unreasonable**.
- 6.43 Related to this is a key desire to improve the speed and reach of high-speed broadband connectivity across Greater Norwich. The Better Broadband for Norfolk programme aims to make high-speed broadband available to more than 95% of Norfolk's premises by spring 2020.
- 6.44 National Building Regulations R1 were updated in 2016 to require new buildings to have physical infrastructure to support high-speed broadband (i.e. ducting within the building), but there is no requirement to provide external or site-wide infrastructure beyond the access point. Currently, there cannot be a requirement for broadband connections in local plans, although the HWP proposes to require local plans to set out how high quality digital infrastructure will be delivered in their area.
- 6.45 The next generation of mobile phone networks will be 5G, and the rollout is expected to commence in 2020. Significantly more base and booster stations will be

required than for the current 3G and 4G networks. The draft NSF⁵² states that all Norfolk authorities will aim to work with the telecommunications industry to produce shared guidance on the location of base and booster stations for the 5G network by the end of 2018, with the potential to include this in emerging local plan documents.

- 6.46 To be consistent with national and local policy, the GNLP will promote healthier lifestyles, sustainable travel choices and greater accessibility to broadband.

Option

- 6.47 It is considered necessary to have a positive policy on non-car transport improvements and improved broadband connectivity. The alternative approach of leaving this to NATS and the market to bring forward schemes is **unreasonable**. This is because it would probably not be viewed as positively planning for the longer-term, and would run the risk of reducing opportunities to connect up GNLP policy with Building Regulations and infrastructure investment programmes by utility providers.

Option TRA1: Broadly continue the current approach⁵³ to encourage public transport improvements, walking and cycling improvements and a better, faster, more comprehensive broadband network. This option would enable positive consideration to be given to such measures, and would help support any funding bids that may present themselves. Improved broadband provision is a key issue, and the influence that a 5G mobile network (with ultra-high speeds) could have on this is significant too. This is considered to be **the favoured option**.

Question

- 38. Are there other measures that the GNLP can promote to support improved sustainable transport and broadband and mobile networks across the plan area?**

⁵² Agreement 17

⁵³ In JCS Policy 6

DESIGN

Context

- 6.48 As well as providing the homes and jobs we need, well-designed new development can add positively to existing places and create attractive new communities. This can be achieved through good design creating new green spaces and habitats, along with improved access to local services and sustainable transport networks. Good design is therefore essential to ensuring that Greater Norwich continues to be an attractive place to live.
- 6.49 The importance of good design in new development is recognised throughout the NPPF, and section 7 is titled *Requiring good design*. The Government “attaches great importance to the design of the built environment...good design...is indivisible from good planning and should contribute positively to making places better for people”⁵⁴.
- 6.50 Local plans should also “develop robust and comprehensive policies that set out the quality of development that will be expected for the area”, allowing for the establishment of “a strong sense of place”, to “create and sustain an appropriate mix of uses” and “create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion”⁵⁵.
- 6.51 Other Government policy⁵⁶ means that few additional standards can be required in local plan policies. For the few allowable optional standards, local evidence is required to justify need. For example, developers must not be required to exceed security standards in individual dwellings; there is a national internal space standard on the minimum size of homes which can be applied through local plans where there is evidence that it is needed and there are optional higher building regulation specifications for accessibility of buildings⁵⁷.
- 6.52 Since publication of the JCS, Building for Life (BfL), used in the adopted policy⁵⁸ to provide a means of assessing design quality, has evolved into BfL12. The system now assesses performance against 12 questions, with a traffic-light system (BfL used to be a points score out of 20) and is a collaborative dialogue, rather than an assessable standard. The Design Council recommends avoiding explicitly requiring all developments to achieve 12 greens, but ‘expecting developments to demonstrate they are targeting BfL12’ for outline applications. Importantly, additional standards must not compromise the viability of schemes.

⁵⁴ Paragraph 56

⁵⁵ Paragraph 58

⁵⁶ Established through a House of Commons Written Statement and a subsequent review of technical housing standards through the Building Regulations

⁵⁷ To promote wheelchair adaptable homes (for use in the future) and wheelchair accessible homes (for use now).

⁵⁸ JCS policy 2

- 6.53 The density of development can often be an important element of good design. The NPPF tells LPAs to “set their own approach to housing density to reflect local circumstances”⁵⁹.
- 6.54 Current policy⁶⁰ requires development to the ‘highest standards’, creating a strong sense of place and respecting local distinctiveness. To achieve this, the protection of the landscape, townscape and the historic environment is prioritised. Further requirements cover; providing landscaping/public art; ensuring cycle/walk friendly neighbourhoods; increasing use of public transport; designing out crime; the use of sustainable/traditional materials and avoiding impact on environmental assets. Developments of 500+ dwellings or 50,000m² non-residential development are required to be master-planned and 10+ dwellings should achieve at least 14 points in BfL. Design & Access statements for non-residential development are required to show how it meets similar high standards.
- 6.55 The districts’ development management policies provide further detail to address design in slightly different ways, but all deal with local character, scale and density. Norwich’s local plan⁶¹ requires the national minimum internal space standards and a proportion of wheelchair accessible homes⁶². Neither South Norfolk nor Broadland currently impose such standards.
- 6.56 Current Greater Norwich policy⁶³ covers density of development. It says that development will: “*make the most efficient appropriate use of land, with the density varying according to the characteristics of the area, with the highest densities in centres and on public transport routes*”. Neither the South Norfolk Development Management Policies document, nor the Broadland equivalent, specify any minimum density requirements for development, emphasising the importance of considering appropriate densities in the context of local character. The Norwich Development Management Policies document expresses similar sentiments about respecting existing character and function, but also states⁶⁴ that a minimum net density of 40 dwellings per hectare should normally be achieved in this wholly urban area, with higher densities normally acceptable in the city centre and areas close to other retail centres and the public transport network.
- 6.57 The density of individual planning applications is often calculated, but neither the South Norfolk nor Broadland monitor density specifically. Norwich does, however, and since 2008/9, about 90 per cent of dwellings completed have been at densities of more than 40 dwellings per hectare.

⁵⁹ Paragraph 47

⁶⁰ JCS Policy 2

⁶¹ Policy DM2

⁶² These have been amended to reflect the House of Commons Written Statement on dwelling sizes

⁶³ JCS Policy 1

⁶⁴ Policy DM12

- 6.58 Relatively little was said in the Issues workshops about design and density, apart from emphasising the general importance of high-quality design in new development.
- 6.59 The GNLP's draft objectives for communities promotes well-designed developments with good access to jobs, services and facilities. The homes objective focuses on the delivery of high quality homes of the right size, mix and tenure to meet people's needs throughout their lives. The environment objective promotes design which protects and enhances of the built and natural environment, makes best use of natural resources and addresses climate change.
- 6.60 The HWP has a great deal to say on the importance of good design, and is particularly strong on the need for communities to have a stronger voice in the design of new housing. It proposes⁶⁵ that the NPPF will be amended to require local plans "to set out clear design expectations following consultation with local communities". Area Design Codes and the greater use of Local Development Orders are also encouraged⁶⁶.
- 6.61 In relation to space standards for residential dwellings, the HWP says⁶⁷ that the Government "*will review the Nationally Described Space Standard to ensure greater local housing choice, while ensuring we avoid a race to the bottom in the size of homes on offer*".
- 6.62 In relation to density, the HWP states⁶⁸ that it is the Government's intention to amend the NPPF to make clear that low-density housing should be avoided (where there is an identified shortage of housing land), and the scope for higher-density development in urban areas well-served by public transport should be considered.

Options

- 6.63 Not having a design and density policy in the GNLP, simply relying on existing development management policies, is **unreasonable** as the NPPF clearly requires a specific policy approach to be taken in new local plans. It would also risk a policy vacuum in some areas currently covered by JCS policies 1 and 2. Two reasonable alternatives have been identified:

Option DE1: Broadly continue with the existing design and density policy approaches, with some relatively minor changes and updating, covering general high-quality design, recognising local character, encouraging walking and cycling etc.

⁶⁵ Paragraph 1.46

⁶⁶ Paragraph 1.33

⁶⁷ Paragraph 1.55

⁶⁸ Paragraph 1.53

This would address, albeit in a fairly basic manner, the requirements of NPPF para 58. This approach could be appropriate, but may not enable full recognition of emerging national policy changes, with an increased focus on high-quality design and density.

This is considered to be **a reasonable alternative**.

Option DE2: Create a stronger policy approach to design and density, including giving a clear policy approach to higher-density development in appropriate locations or scenarios. There are links to the housing delivery policies. This approach would allow most of the existing policy content to be rolled forward, with appropriate updates, but it could allow greater specificity of design requirements. It could also allow identification of areas suitable for higher-density development, and perhaps specify minimum densities. It could consider the question of residential space standards, design quality and wheelchair accessibility too.

This is considered to be **a reasonable alternative**.

Question

39. Which approach do you support for promoting good design of new development?

HOUSING

Context

- 6.64 Increasing the delivery of housing is a key aim of Government policy and is a significant issue in Greater Norwich. However, it is important that the GNLP ensures that a plan-led approach can be taken so that much needed housing is delivered in locations where it minimises the need for additional infrastructure and enables new residents to have sustainable access to services and jobs.
- 6.65 The NPPF⁶⁹ requires local plans to set out strategic priorities to deliver the homes needed in the area and highlights the need for authorities to:
- Plan for a mix of housing based on current and future demographic trends, market trends and the needs of various groups, such as families, older people, self-builders, people with disabilities and service families; and
 - Identify the size, type, tenure and range of housing required in particular locations, reflecting local demand.
- 6.66 Much of the key evidence base for housing need in Greater Norwich is in the 2017 SHMA. Chapters 4 and 5 (Core Matters) discuss the overall housing needs of the Greater Norwich area and more specific SHMA evidence is discussed in the relevant sections below.
- 6.67 Current policy in Greater Norwich⁷⁰ covers a number of housing issues, including: the scale and distribution of housing growth; the mix of housing required for balanced communities; the delivery of affordable housing; delivery of Housing with Care; and planning for Gypsies and Travellers and Travelling Showpeople.
- 6.68 [Annual Monitoring Reports](#) (AMRs) in recent years have shown that housing delivery has been variable. In the Norwich Policy Area (NPA), there is not currently a five-year supply of land (the figure for the end of 2015/16, the most recent available, is 4.70 years). The housing land supply position in the two Rural Areas is much higher, being 28.4 years in the Broadland Rural Area and 39.6 years in the South Norfolk Rural Area. The delivery of affordable housing overall in Greater Norwich has also been short of that required in recent years.
- 6.69 Discussions at the Issues workshops in relation to housing delivery covered: early funding of infrastructure being critical to support housing; affordability; the need for developments to offer a balanced mix of housing which considers the needs of an ageing population, general support for appropriate

⁶⁹ Paragraphs 156 and 50

⁷⁰ JCS Policy 4 “Housing Delivery” and its supporting text

densities of housing, space standards, adaptable homes and local distinctiveness.

- 6.70 While the HWP does not have any formal status at present, it is nonetheless a clear statement of the Government's intent and is therefore important. Many of the proposals to speed up the delivery of housing would, if implemented, have important effects on the preparation of local plans. A Government consultation, *Planning for the right homes in the right places*, which ran from September-November 2017, fleshed out some the HWP intentions.
- 6.71 The draft GNLP objective *To enable delivery of high quality homes of the right size, mix and tenure to meet people's needs throughout their lives*, will contribute to the vision to grow vibrant and healthy communities.

What should the minimum affordable housing threshold be?

- 6.72 Current Greater Norwich policy states that affordable housing will be sought on all sites of 5 dwellings or more, with stepped thresholds of 20%, 30% and 33% (for sites of 16 dwellings or more). However, a written ministerial statement in November 2014 (which is reflected in the Planning Practice Guidance) states that developments of fewer than 11 dwellings should not be required to provide affordable housing contributions (the Government's reasoning being that small and medium-sized builders need support). Whilst this does not supplant the primacy of the development plan in the determination of planning applications, it is considered likely to be included in an updated version of the NPPF, which is expected in spring 2018.
- 6.73 Greater Norwich is a mix of urban areas and extensive rural areas, with many small settlements. Smaller sites have tended to be an important source of affordable housing, particularly in more rural areas. Applying a minimum threshold for affordable housing is closely linked to the minimum allocation size that the GNLP will have, but having too high a threshold for affordable housing would risk delivering less affordable housing through Section 106 agreements linked to planning applications.
- 6.74 Irrespective of the affordable housing threshold chosen for the GNLP, it is proposed to require the affordable rented: low-cost home ownership ratio evidenced in the SHMA rounded to 80:20 for sites of 50 or fewer dwellings.

Options

- 6.75 Two potential policy alternatives are suggested for this issue, requiring affordable housing on sites of five or more dwellings, and on sites of eleven or more dwellings. Two further options are considered to be **unreasonable**:
- **Requiring affordable housing on sites of fewer than five dwellings.**
This approach would strongly conflict with Government policy to

support small and medium-sized housebuilders, and would also be likely to generate viability concerns, meaning that some sites may have to go through additional negotiations to reduce or set aside the policy requirement, potentially delaying the delivery of housing.

- **Only requiring affordable housing on sites of more than 15 dwellings.** Excluding sites smaller than 15 from affordable housing requirements is likely boost their viability. However, it could also significantly diminish the delivery of affordable housing, as many sites in Greater Norwich, particularly brownfield sites, tend to be smaller than this. This would therefore eliminate a significant source of affordable housing supply from smaller “windfall” sites that will come forward during the plan period. This approach could also reduce the choice of allocation sites, with potential detrimental impacts on character and appearance and also on securing mixed and balanced communities.

Option AH1 - A proportion of affordable housing would be sought on all sites of five or more dwellings or 0.4 hectares or more (as per current JCS Policy 4)

Historically many small sites have been developed across Greater Norwich. With the potential decline of 100% affordable housing exception sites, smaller sites could become the main source of affordable housing in smaller settlements. The approach would, however, conflict with the threshold set out in national guidance, which is sites of 11 or more dwellings. Therefore, very clear evidence would be needed to show a local necessity, which would outweigh the approach advocated in the PPG (and, potentially in 2018, the NPPF).

The effect of this policy approach on site viability could be minimised by allowing the amount/tenure balance of sites to be adjusted in appropriate circumstances.

Notwithstanding the above, because of the potential importance of a lower threshold to the delivery of affordable housing in smaller settlements, this approach is currently considered to be **a reasonable alternative**.

Option AH2 - A proportion of affordable housing would be sought on all sites of 11 or more dwellings (or 0.5 hectares or more).

This approach is consistent with current Planning Practice Guidance and may well be enshrined in future changes to the NPPF. The effect of this policy approach on site viability could be minimised by allowing the amount/tenure balance of sites to be adjusted in appropriate circumstances.

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

Question

40. Which approach to affordable housing thresholds do you prefer?

Application of affordable housing percentage requirements on sites

- 6.76 The 2017 SHMA conclusion⁷¹ is that a total of 11,030 affordable houses need to be provided over the period 2015-2036. This is 28.9% of the total planned housing need for Greater Norwich (see section 4 above). However, it is inevitable that not all sites will be able to deliver a policy-compliant level of affordable housing. Circumstances can change, and the GNLP, as with all local plans, will need to recognise this through a viability exemption.
- 6.77 The SHMA evidence is that the amount of affordable housing need varies significantly across the three districts, from 19.9% in South Norfolk, and 24.4% in Broadland to 38.3% in Norwich. However, as the GNLP is a joint plan, with a proportion of Norwich's "overspill" housing being accommodated in Broadland and South Norfolk, applying these differential rates is not a reasonable policy approach to take.
- 6.78 Recognising that a reasonable policy approach in the GNLP is to plan for a higher amount of housing than the OAN (to reflect the ambitions of the City Deal), as explained in section 4 above, there are several alternative policy approaches.
- 6.79 Similar to current Greater Norwich policy⁷², it is proposed that a viability test be allowed for. This would allow for the proportion of affordable housing to be provided to be reduced or the balance of tenures⁷³ to be adjusted where infrastructure or affordable housing costs would render a site unviable in current market conditions. It is also proposed that any applicant making a viability case to reduce the affordable housing requirements would need to do so using an open-book process. This means that the viability report could not, as a rule, be kept confidential.

Options

- 6.80 Seeking less than 29% affordable housing on all sites above the qualifying threshold is considered to be **unreasonable**. While this could increase the viability of most sites, it would risk under-delivery of the overall affordable housing target. It would also mean that a higher overall housing figure might be needed to get close to delivering 11,030 affordable houses, which could cause difficulties if excessive amounts of market housing would be needed to help deliver the required amount of affordable housing. Under-delivering affordable housing would also have negative social impacts in terms of alleviating over-crowded accommodation and "hidden families".

⁷¹ See Figure 65

⁷² In JCS Policy 4

⁷³ affordable and/or social rented v low cost home ownership housing

Option AH3 - Seek 29% affordable housing on all sites above the qualifying threshold

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

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

Experience would dictate that not all sites will be able to meet a 29% requirement on viability grounds. Therefore, setting a requirement at 29% could risk under-delivery of affordable housing. This could be mitigated by ensuring that there is an appropriate delivery buffer incorporated in the scale of housing allocation to ensure sufficient sites are available to deliver the overall affordable housing requirement.

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

Option AH4 – Seek more than 29% affordable housing on all sites above the qualifying threshold

The SHMA identifies an overall affordable housing requirement of 29%. Experience would dictate that not all allocated sites will be able to meet a 29% requirement on viability grounds. Therefore, requiring a higher affordable housing requirement would help to mitigate potential under-delivery on some sites.

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

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

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

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

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

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

Question

41. Which approach do you favour for affordable housing percentages?

Tenure split for affordable housing

- 6.81 The evidence of the 2017 Central Norfolk SHMA is that the split between affordable/social rented dwellings and low-cost home ownership (LCHO) should be 79:21 (which would be sensibly rounded to 80:20 for simplicity on sites below 50 dwellings). Whilst it is recognised that the definition of “affordable housing” may perhaps be broadened in the next update to the NPPF to include other tenures, such as Starter Homes, it is believed that this would not justify a different split. As an example, were the changes to come about, Starter Homes, Discounted Market Sales Housing, and some forms of intermediate housing would all “count” as LCHO products.
- 6.82 The evidence from recent AMRs is that, broadly, the current split of 85:15⁷⁴, is met, even if reduced levels of affordable housing are accepted as being justified on viability grounds.
- 6.83 The Government sees Build-to-Rent (the large-scale construction and management of blocks or groups of dwellings) as having potential to increase housing delivery, benefit from off-site construction techniques and tap into less traditional sources of housing finance such as pension funds. The economics of Build-to-Rent schemes are different to normal and there may be an argument to consider the merits of such potential sites differently.

Options

- 6.84 There is no evidence to apply a different affordable housing ratio to that established in the SHMA as doing so would risk insufficient affordable and social rented dwellings being provided. Consequently, this is an **unreasonable** approach.

Option AH6: Require all qualifying sites to provide the SHMA-evidenced ratio of rented and low-cost home ownership housing on all sites

The most straightforward approach is to apply the rounded SHMA requirements of a 79:21 split (rounded to 80:20 for sites of 50 or below for simplicity) between rented and low-cost home ownership products across all qualifying sites. Compliance with such a policy would, in broad terms, ensure that the needs for different tenures are met. Therefore, this is **the favoured option**.

⁷⁴ As required in JCS Policy 4, which applies to sites of 16+ dwellings

Question

42. Do you support the favoured option for tenure split?

Rural Windfall, Exception Sites and Small Sites

- 6.85 Current Greater Norwich policy allows for housing on “exception” sites, either through allocations in Other Villages or above, or elsewhere on a windfall basis, where there is an identified local need. It does not mention cross-subsidy specifically, but says that such houses should be made available “in perpetuity”, although the NPPF glossary on “Rural Exception Sites” says that small numbers of market homes may be allowed at the LA’s discretion (to cross-subsidise the affordable housing), for example where there is no grant funding available for affordable housing. In some cases, funding from the Homes and Communities Agency (shortly to be re-named Homes England) may be available to support specific sites.
- 6.86 The HWP suggests that a broader mix of tenures will be classed as “affordable housing” in the future, including Starter Homes. It states⁷⁵ that Starter Homes are intended, with local connection tests, to be acceptable on rural exception sites, although it is not made clear whether such a tenure mix could be 100% Starter Homes.
- 6.87 The HWP also states⁷⁶ that local plans should have policies to support small “windfall” sites, including allowing an element of cross-subsidy. By “small” it is assumed that what is meant is 10 or below, so potentially below the affordable housing threshold. The worry is that this could mean that most of the historic sources of exception sites could potentially come forward for all-market schemes instead – so why would any landowners want to offer such sites at below market levels if this changes?
- 6.88 It also raises questions about the extent to which the GNLP should consider restricting, if at all, the total number of sites/dwellings which would be allowed under the “small sites windfall” policy that the HWP indicates will be necessary.
- 6.89 There is also a desire on the part of some to make some provision for Custom Build plots/sites in smaller settlements.

Options

- 6.90 Two reasonable alternatives are identified below:

⁷⁵ Paragraph 4.19

⁷⁶ Paras 1.30, A52 and A54

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

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

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

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

Question

43. Which approach do you think should be taken to rural windfall and exceptions sites?

Housing mix – relative ratios of house sizes by bedrooms

6.91 The evidence from the 2017 SHMA ⁷⁷ sets out the mix of dwelling sizes required separately for flats (1 and 2+ bedrooms) and houses (2, 3, 4, and 5+ bedrooms). It also has separate breakdowns for market housing and affordable housing. This reflects some of the recent tax and benefits changes, including changes to Local Housing Allowance (LHA) rates, and the Spare Room Subsidy. The table below includes the percentages too:

⁷⁷ Figure 83

Figure 6 Objectively Assessed Need Housing Mix (excluding the City Deal implications)

	Bedrooms	Market Housing (numbers and percentages)		Affordable Housing (numbers and percentages)		Total (numbers and percentages)	
Flats	1	1,285	4.5%	2,725	24.7%	4,010	10.2%
	2+	1,352	4.8%	1,404	12.7%	2,756	7.0%
Houses	2	3,227	11.3%	2,863	26.0%	6,090	15.4%
	3	16,393	57.6%	3,238	29.4%	19,631	49.7%
	4	4,982	17.5%	661	6.0%	5,643	14.3%
	5+	1,215	4.3%	140	1.3%	1,355	3.4%
TOTAL		28,454	100%	11,031	100%	39,485	100%

- 6.92 There are some significant differences between the mixes for market and affordable housing. For instance, the percentage of flats required is only 9.3% of market dwellings, whereas it is 37.4% of affordable dwellings, and three-bedroom houses constitute 57.6% of market housing need, compared to only 29.4% of affordable housing need. Individual figures for the three Greater Norwich districts⁷⁸ show considerable differences too. As might be expected, given its younger and generally less prosperous population, Norwich has a significantly greater proportional need for one- and two-bedroom properties than Broadland and South Norfolk, especially for affordable housing.
- 6.93 It is important to note that the figures above only relate to the OAN figure for Greater Norwich. Should it be decided that the GNLP will plan to accommodate more than OAN (see section 4), then it would introduce a little more flexibility in terms of housing mix (overall) – in other words, if certain sites could not deliver the SHMA-proposed mix of housing sizes, the overall market housing and affordable housing OAN targets (by numbers) might still be met or exceeded.
- 6.94 There will always need to be some flexibility in this policy area to enable specific proposals to be considered on their merits (i.e. constrained brownfield sites, or to avoid 1-bed flats/houses on small sites in areas where the grain of development is larger houses in spacious plots). The proposal below would be intended to apply to all sites, whether they be allocated or windfall.
- 6.95 All sites above the threshold would be expected to provide the housing mix in line with the most recent evidence. Currently this is figure 6 above, drawn from the 2017 SHMA, but this may change in future updates of the SHMA.

Options

- 6.96 Allowing different housing ratio mixes to apply for Broadland, Norwich and South Norfolk is **unreasonable**. The current evidence base shows that Norwich has a much higher need for 1-2 bedroomed properties, proportionately speaking, than the other

⁷⁸ [Figure 83 of the SHMA](#)

two districts. However, requiring different figures to be applied for each district would run the risk of restricting much needed smaller dwellings in Norwich fringe locations like Thorpe St Andrew and Cringleford, which are likely to accommodate some of Norwich's unmet need. Two reasonable alternatives have been identified:

Option AH9: Specify a threshold above which the identified housing mix would apply.

This would require smaller sites (perhaps 10-50 houses) delivering affordable housing to deliver a mix of smaller and larger dwellings. Sites below the threshold would not need to meet the mix. This would be appropriate if, for example, a rigid application of a mix would require a small brownfield site to provide a four-bedroom house as part of a mix when an all-flatted scheme would be more appropriate and sensible.

This option is regarded at as **a reasonable alternative.**

Option AH10: Do not require the identified housing mix need to be required on all sites individually.

JCS Policy 4 does not have a threshold, instead requiring housing proposals "to contribute to the mix of housing required to provide balanced communities and meet the needs of the area". Overall, it may be that schemes would naturally balance out – higher-density schemes would be expected to deliver more 1 and 2-bed dwellings, whereas more rural schemes might deliver more 3 and 4-bed dwellings. Larger schemes, particularly greenfield sites, tend to provide generally the right mix organically. Also, not requiring a mix explicitly would also allow some flexibility in relation to the ratios of flats and houses as the need/demand for flats is higher in some areas than others.

This is considered **a reasonable alternative.**

Question

44. Which approach to the mix of housing do you support?

Older people & care accommodation

- 6.97 There is a rapidly-ageing population in nationally and locally, which has significant implications for planning and plan-making. All Norfolk's local authorities are working hard to try to reduce pressure on the social care and hospital budgets through a range of "early help" measures, and key amongst them is a desire to help keep people at home for as long as possible before moving into residential care accommodation. There is also increasing demand for specialist retirement-type accommodation, sometimes called "extra-care". This accommodation includes an element of care which helps people to "down-size" to more appropriate and desired accommodation more easily. The NPPF, and the HWP, make clear that planning for older people's housing needs is very important.
- 6.98 The 2017 SHMA says that, on a trend basis, about 1,900 extra "institutional" people are expected by 2036 across Greater Norwich, with the figure not counted as part of the OAN total. However, this does not necessarily mean that this requires an equivalent increase in residential institution bed-spaces, because specialist older

people's accommodation may be more appropriate. If more housing with care or sheltered accommodation is provided, rather than care homes, then there will be a need for some additional figures to be added to OAN, and this is the position Norfolk County Council is promoting in the *Promoting Independence* strategy. The county council is doing further work on this issue and there should be some up-to-date figures available in the next few months.

Housing with Care, Extra-Care Housing and Retirement Housing

6.99 Four **reasonable alternatives** are detailed below:

Option AH11: Enable residential care accommodation uses⁷⁹ to be appropriate on any allocated housing sites, subject to a criteria-based policy

Many housing sites are either existing commitments, or will be newly allocated in the GNLP. One approach could be to allow specialist residential care accommodation (use class C2) to be provided on allocated housing sites. This would enable such accommodation to be provided on a wide range of housing sites in a variety of locations.

This approach would need to be practised alongside a criteria-based policy: residential care accommodation is normally best-placed where it is well-related to local services, particularly a GP surgery, public transport and shops. This is to enable staff, residents and visitors to have good access.

However, it is recognised that there can be competition for many of these housing sites, and some retirement-type uses can sometimes be outbid by market housing developers due to higher build costs.

This is considered **a reasonable alternative**.

Option AH12: Make specific allocations for residential care and retirement care⁸⁰ uses

Some sites, such as those benefitting from good access to services including healthcare, public transport and shops, are particularly suitable for specifically allocating for residential and retirement care uses.

This option is regarded at as **a reasonable alternative**.

Option AH13: Develop a criteria-based policy to enable new retirement/care accommodation to be accommodated on land outside settlement boundaries and/or on other types of land within settlement boundaries

It can sometimes be difficult for developers and operators to find the right sites in the right locations for the these kind of uses – higher build costs can mean that market housebuilders can often outbid retirement/care developers for sites. A criteria-based policy could enable unallocated sites to come forward when a need has been demonstrated, but probably only in higher-order settlements. This could be extended to include under-used or unviable employment land, which will normally be within settlement boundaries. Several such schemes have been approved in Greater Norwich in the last few years.

⁷⁹ Planning Use class C2

⁸⁰ Planning Use class C3

This option is regarded as **a reasonable alternative.**

Option AH14: Require an amount of C2 residential care and/or C3 extra-care or retirement uses to be accommodated on “qualifying” housing allocations in particular locations

Given the difficulties that are sometimes experienced in securing land for retirement/care type accommodation, one option is to require part of larger allocations to be set aside for retirement and/or care accommodation. Whilst this might have some viability implications, it is clear that the need for these types of accommodation is increasing with the ageing population, potentially justifying such a proactive approach.

This option is regarded as **a reasonable alternative.**

Question

45. Which approach or approaches to housing for older people and care accommodation do you favour?

Caravans and houseboats needs

- 6.100 National planning policy for Gypsies & Travellers and Travelling Showpeople is set out in Planning Policy for Travellers Sites (PPfTS) which is an adjunct to the NPPF.
- 6.101 The NPPF⁸¹ and PPfTS require that the accommodation needs of Gypsies and Travellers are met through the local plan which needs to identify a supply of specific, deliverable sites to provide 5 years’ worth of sites against locally set targets. Local plans are also required to identify a supply of specific, developable sites, or broad locations for years 6-10 and, where possible, for years 11-15.
- 6.102 A key change introduced in PPfTS alters the planning definition of Gypsies and Travellers to exclude those who have ceased travelling permanently. Only those who are “of nomadic habit of life”, including those who are temporarily non-nomadic, are classified as Gypsies and Travellers for planning purposes.
- 6.103 Under the requirements of the Housing and Planning Act 2016, local authorities are now required to carry out assessments of those residing or resorting to caravans or houseboats. Consultants were commissioned to carry out this work.
- 6.104 The key findings of the 2017 Norfolk Caravan & Houseboat Accommodation Needs Assessment (ANA) are that:
- There is little need for houseboat moorings outside the Broads Authority area;

⁸¹ Paragraph 156

- There is limited *need* (as distinct from *demand*) for more park homes in Greater Norwich;
- There is need for more Gypsy & Traveller pitches across Greater Norwich; and
- There is need for some additional Travelling Showpeople pitches in Greater Norwich to address over-crowding on two current sites.

Current policy

6.105 Current Greater Norwich policy⁸² quantifies the need for new Gypsy and Traveller pitches to 2026, including new transit provision, based on figures in the former East of England Plan. However, these figures were updated by a Greater Norwich Gypsy and Traveller Needs Assessment in 2012 (which itself has now been superseded by the 2017 ANA), and so are of little relevance now. Policy 4 states that sites should normally not contain more than 10-12 pitches and should be in locations with good access to services, with some provision to be provided in association with large-scale strategic housing growth.

6.106 All three districts have existing criteria-based development management policies to assist in the determination of Gypsies & Travellers planning applications, including transit sites. However, in the light of changes to the national definition of Gypsies and Travellers for planning purposes in the PPfTS and the findings of the Caravans and Houseboats ANA, there may be a case for a new policy approach.

Current accommodation

6.107 Current accommodation for Gypsies and Travellers is a mixture of public sites in South Norfolk and Norwich, and private sites in South Norfolk and Broadland. There are two Travelling Showpeople yards in Norwich (one large) and a site in South Norfolk. There is also a transit site for Gypsies and Travellers at Costessey in South Norfolk.

Future accommodation needs

6.108 The position in relation to future accommodation for Gypsies and Traveller needs is complicated. There is a lack of clarity about whether the change to the definition of Gypsies and Travellers introduced through PPfTS applies to those who are nomadic for work-related reasons or to those who are nomadic for cultural reasons. Most existing case-law supports the first definition, which is the so-called “tighter” approach. The alternative or “looser” approach could also apply to those who travel mainly for cultural reasons, to attend festivals, social gatherings and so on. The ANA includes both sets of figures but emphasises that it is for the Greater Norwich authorities to decide which are more appropriate. The Greater Norwich authorities are of the view that the so-called “tighter” definition is the more appropriate one to

⁸² JCS policy 4

use, in line with current practice, but it is recognised that as case-law and appeal decisions continue to evolve nationally, the situation might change.

- 6.109 The ANA does not make findings on an identified “split” of public site need against private site need, but the findings of the surveys show that most Gypsies and Travellers would prefer to live on a small family site, rather than as part of a larger site with other families. Some families and individuals can likely afford to buy and develop their own site if they can find a suitable and available site; some could afford to develop a site, but not to buy it (at least to begin with); and others are not likely to be able to afford to buy or develop a site, and so would need to live on a public site.
- 6.110 The findings of the ANA show that Gypsies and Travellers are not wedded to living in a specific Greater Norwich district; whilst, in many cases, wanting to stay fairly close to existing family members, they do not draw a distinction between the three districts. This is useful information, and bolsters the recommendation in the PPfTS⁸³ that authorities prepare a joint local plan and “set targets on a cross-authority basis to provide more flexibility in identifying sites”. The ANA therefore provides the need figures for the whole of Greater Norwich, not broken down into district-level figures.
- 6.111 The ANA concludes that whilst there is additional need for temporary stopping places, this does not necessarily need to be in the form of transit sites, but could be through “negotiated stopping places”, where very limited facilities would be available for up to 28 days every year.
- 6.112 In relation to Travelling Showpeople, given the large vehicles and fairground equipment that needs to be stored and transported, the plots that are required are somewhat larger than a Gypsy and Traveller pitch. Frequent travelling also means that good access to the major road network is important.
- 6.113 The Caravans and Houseboats ANA has therefore identified the scale of the need for Gypsies and Travellers (under the “tighter” definition), Residential Caravan Dwellers, Houseboat Dwellers and Travelling Showpeople as:

⁸³ Paragraph 10 c)

Accommodation type/Period	2017-2022	2022-2027	2027-2032	2032-2036	Total
Gypsies and Travellers	-2	11	11	11	31
Travelling Show people	25	6	7	8	46
Residential Boat Dwellers	0	0	0	0	0
Residential Caravan Dwellers	91	5	5	5	106

Options

Houseboats

6.114 Making specific allocations of land for permanent and/or temporary houseboat moorings is considered to be **unreasonable** as there is no evidence of need in Greater Norwich, and no potential sites have been put forward through the Call for Sites.

6.115 The **reasonable alternatives** are:

Option HB1: Develop a criteria-based policy to allow for moorings for houseboats (temporary or permanent) to come forward in appropriate areas in Greater Norwich, subject to evidence of need

There are virtually no permanent, permitted moorings for houseboats in Greater Norwich, with the Broads area having most, and the Accommodation Needs Assessment does not identify any needs over the period to 2036. However, the current local plans do not contain a houseboat policy to allow new applications to be assessed against. Developing a criteria-based policy is therefore considered **a reasonable alternative**.

Option HB2: Continue with the current approach of not having a policy to judge applications for moorings for houseboats against, relying instead on the NPPF and other development plan policies.

As the number of applications for new houseboat moorings is likely to be very low, there may be a case for not having a policy covering this matter in the GNLP – it is not required for a Local Plan to have a policy to cover every possible planning scenario.

This option is regarded as **a reasonable alternative**.

Question

46. Which of the reasonable alternatives for houseboats do you favour?

Gypsies & Travellers

Options

6.116 Having only a criteria-based policy is not an appropriate option. It would reduce the level of certainty that the level of identified need would be provided, given the practical difficulties that there can sometimes be in finding acceptable sites for new Gypsy and Traveller pitches to be located on. It would also run contrary to the PPfTS⁸⁴ which requires local planning authorities to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit accommodation needs. PPfTS requires authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of sites against the target, as well as to identify a supply of specific, developable sites or broad locations for growth for years six to ten and, where possible, years 11-15.

Option GT1: Make specific allocations of land to deliver the quantified need for new Gypsy and Traveller accommodation pitches (as well as a criteria based policy)

This would give the greatest certainty that the scale of required need would be planned for, especially in the first five years of the plan period. These allocations could be new sites and/or extensions to existing sites. This policy approach would need sit alongside a criteria-based policy to judge new windfall applications against, as required by *Planning Policy for Traveller Sites*.

This is therefore considered the **favoured option**.

Option GT2: Require larger housing allocations (say 150+) to include a certain number of Gypsy & Traveller pitches to help meet the overall level of need

This could help meet the overall level of need, and would help secure mixed communities and promote "peaceful and integrated co-existence between the site and the local community"⁸⁵.

This option is regarded at as **a reasonable alternative**.

Questions

47. Which policy approach do you favour to planning for the needs of Gypsies and Travellers?

48. Are there any suitable sites for Gypsy and Traveller accommodation you wish to submit?

⁸⁴ Paragraph 11

⁸⁵ Planning Policy for Traveller Sites, paragraph 13a

Travelling Showpeople

- 6.117 Evidence from the Caravans and Houseboats ANA shows that the current site at Mousehold is over-crowded and that about an additional 46 plots are needed in Greater Norwich or North Norfolk, 25 of which are required from 2016-2021. They generally need to be well-located in relation to the major road network due to the regular use of HGV vehicles. Such plots also need to be fairly large, to allow the storage of both touring caravans and fairground equipment.

Option

- 6.118 Given the practical difficulties that there can be in finding appropriate sites for new Travelling Showpeople plots to be located on (no new sites have been provided since the JCS has been adopted, despite an identified need), it is necessary to allocate sites.

Option TS1: Make allocations to deliver some or all of the need for new Travelling Showpeople plots, along with a criteria based policy

This gives the greatest certainty that the scale of required need would be being planned for. Due to constraints at existing sites preventing extensions, these sites would need to be new sites. Such a policy approach would be best practised alongside a criteria-based policy to judge new windfall applications against.

Allocating to meet the most or all of the identified level of need is therefore considered **the favoured option**.

Questions

49. Do you support the favoured option for planning for the needs of Travelling Showpeople?

50. Are there any suitable sites for Travelling Showpeople accommodation you wish to submit?

Residential Caravans/Park Homes

- 6.119 The ANA concludes that there is a need/demand for about 106 dwellings in Greater Norwich to 2036, most of which is in the period 2017-2022. The two main sources of need/demand for this type of accommodation are firstly those who choose this accommodation for affordability reasons, and secondly those who choose it for “lifestyle” reasons. In addition, some who self-identify as a Gypsy or Traveller, but who do not travel at all for work reasons, likely form part of the need/demand in this category.

6.120 Some existing caravan parks could perhaps expand to meet need, and other sites new sites could also be considered.

Option

6.121 Having only a criteria-based policy would not be a reasonable approach to take, as it would not demonstrate how the Greater Norwich authorities would best meet the identified need/demand for this type of accommodation.

Option RC1: Make allocations to deliver at least part of the quantified need/demand for new Residential Caravans, along with a criteria based policy

Such locations would generally be outside existing settlement boundaries, albeit they could be included within new/expanded settlement boundaries. As with Gypsies and Travellers, a criteria-based policy to assess potential new sites against would also need to be included

Allocating to meet the most or all of the identified level of need is therefore considered **the favoured option.**

Questions

51. Do you support the favoured option for residential caravans and park homes?

52. Are there any potential locations for new/expanded residential caravans sites that you wish to propose?

CLIMATE CHANGE

Context

- 6.122 Local plans, particularly those which deliver housing and jobs growth, must take account of their impacts on climate change.

National policy⁸⁶ requires that the net UK carbon account for six key greenhouse gases is reduced by 80% by 2050 and imposes a legal duty⁸⁷ to include “Policies designed to secure that the development and use of land in the local planning authority area contribute to mitigation of, and adaption to, climate change”.

- 6.123 Climate change is highlighted in the NPPF as “central to the economic, social and environmental dimensions of sustainable development”⁸⁸, with LPAs told to “adopt proactive strategies to mitigate and adapt to climate change”⁸⁹. LPAs are also instructed to “plan for new development in locations and ways which reduce greenhouse gas emissions”⁹⁰ and “take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape”⁹¹. Energy issues are covered in paragraphs 6.172 to 6.180 below.
- 6.124 The JCS covers climate change in Policy 1: *Addressing Climate Change and Protecting Environmental Assets*, although the matter also finds expression in several other JCS policies. The two “parts” to climate change are addressed in Policy 1: mitigation (through locating and designing development to use resources efficiently and minimising greenhouse gas emissions) and adaptation (the location and design of new development to be adapted to a changing climate and more extreme weather).
- 6.125 Annual monitoring results show that carbon dioxide (CO₂) emissions per capita have generally decreased year-on-year across Greater Norwich since 2011/12. However, it is unclear whether, with a growing population, overall emissions have risen over the period.
- 6.126 The GNLP’s draft environment objective is: *To protect and enhance the built and natural environment, make best use of natural resources, mitigate against and adapt to climate change* and the communities objective is: *To grow vibrant, healthy communities giving people a high quality of life in well-designed developments with good access to jobs, services and facilities*. The overall vision is relevant to climate change too: *To grow vibrant, healthy communities supported by a strong economy and the delivery of homes, jobs, infrastructure and an enhanced environment*. It is also important to note that greenhouse gas emissions/climate change is one of the

⁸⁶ The 2008 Climate Change Act

⁸⁷ The 2004 Planning and Compulsory Purchase Act

⁸⁸ Paragraph 93

⁸⁹ Paragraph 94

⁹⁰ Paragraph 95

⁹¹ Paragraph 99

Sustainability Appraisal objectives and so reasonable alternatives for all policies will all be assessed against it.

Option

6.127 No alternative approaches to **the favoured option** have been identified.

CC1 Continue the current policy approach

The favoured option is for the GNLP to include a policy to consider the impacts of climate change based on the current policy approach.

Question

53. Do you support the favoured option for climate change policy?

AIR QUALITY

Context

- 6.128 Successful planned growth needs to take account of its impacts on air quality. Air quality impacts on health and quality of life and the plan should take positive steps to address current air quality problems. This section discusses how the plan should tackle the issue.
- 6.129 The NPPF⁹² requires that planning policies should ensure that, taking into effect cumulative impacts and the presence of any Air Quality Management Areas (AQMA), compliance with air quality values should be achieved. The inter-relationship between planning and air pollution is further detailed, with new development in AQMA being required to be consistent with the local Air Quality Action Plan and the importance of assessing cumulative impacts of developments on air quality being particularly noted.⁹³
- 6.130 There are limited references to air quality in the JCS, although poor air quality in Hoveton (just across the bridge from Wroxham, in North Norfolk district) is noted. An AQMA was designated in Hoveton and so development in Wroxham may impact air quality in Hoveton, and vice versa.
- 6.131 There has been at least one AQMA in Norwich since 2003. Four individual AQMA were amalgamated into a single Central Norwich AQMA in 2012, covering the area within the Inner Ring Road. Norwich City Council published the most recent Air Quality Action Plan in 2015, and an Air Quality Annual Status Report was published in 2016. The action plan details measures to be taken to reduce nitrogen dioxide (NO₂) to below threshold levels, largely focussing on transport and travel measures. NATS has an important role in tackling these issues through implementation measures such as prioritising sustainable transport.
- 6.132 All three Greater Norwich authorities have existing development management policies covering air quality⁹⁴, although the precise details and coverage vary. All three authorities also have development management policies requiring Transport Assessments and/or Travel Plans to be prepared and submitted alongside relevant applications, which must encourage sustainable modes of travel.
- 6.133 Air quality, particularly in Norwich, was noted as a concern by stakeholders at the Issues workshops, and it was felt that traffic reduction should be tackled. The need for better monitoring of air quality elsewhere in Greater Norwich was also raised as an issue.
- 6.134 In July 2017, in response to the requirements of the High Court, the Government published the [UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations](#). In it,

⁹² Paragraph 12

⁹³ Paragraphs 109, 120 and 124

⁹⁴ EN4 (Broadland), DM 11 (Norwich City) and DM 3.14 (South Norfolk)

29 local authority areas are identified as having exceeded NO₂ target levels persistently, and so are required to take local action to resolve the issue within the shortest time possible. No particular measures are mandated, but they could include retro-fitting improved engines to local buses, support for cycling, changes to infrastructure and the introduction of vehicle charging zones. No Greater Norwich authorities are on the current list, but should NO₂ emissions worsen in Norwich, or not improve sufficiently, it is conceivable that Norwich could be added to the list later. The Government also announced in July 2017 that the sale of new petrol- and diesel-fuelled cars would be banned in the UK by 2040.

- 6.135 The draft GNLP environment objective is: *To protect and enhance the built and natural environment, make best use of natural resources, mitigate against and adapt to climate change* and the communities objective is: *To grow vibrant, healthy communities giving people a high quality of life in well-designed developments with good access to jobs, services and facilities*. The overall vision is relevant too: *To grow vibrant, healthy communities supported by a strong economy and the delivery of homes, jobs, infrastructure and an enhanced environment*.

How should air quality be covered in the GNLP?

- 6.136 The potential implications of development on air quality (and vice versa) will be considered through the development of the GNLP. Individual sites will be considered through the site assessment process, and relevant planning applications may need to demonstrate how they have assessed air pollution impact. Given the increased recognition of the dangers caused by poor air quality, the existing development management policies may need to be strengthened to enable air quality impacts to be assessed and mitigated.
- 6.137 There are links to other issues, and not just NATS. For example, improving the availability of high-speed broadband in rural areas could potentially facilitate greater home-working, and so reduce the need to travel by motorised vehicles. Two reasonable alternatives have been identified:

Options

Option AQ1 – Require planning applications which have the potential to impact on air quality to be accompanied by air pollution impact assessments and mitigation measures

This approach could see policy criteria developed against which types of planning applications would be judged, and/or in which areas of Greater Norwich would need to be accompanied by air pollution impact assessments. The results of the assessments would need to influence the design and layout of the scheme, and would be expected to also influence other potential mitigation measures (such as open space provision, tree-planting, cycle-path provision, public transport provision, any electric vehicle charging points etc).

There are potential benefits from having an over-arching air quality policy in the GNLP, to better ensure that cumulative and consequential impacts of developments can be considered on a similar basis throughout Greater Norwich. It would also clearly demonstrate that the requirements of the NPPF in relation to air quality are being considered. A further benefit is that this policy approach could evolve with the review of the NATS programme.

This is considered to be **a reasonable alternative**.

Option AQ2 – Do not have a specific policy in the GNLP on air quality

There is already existing policy coverage of air quality matters and related issues in the three districts' development management policies documents. Taken with the NPPF requirements in relation to air quality, specific policy coverage in the GNLP could represent unnecessary duplication.

However, there is an existing AQMA in Norwich, and with the Government's increased focus on improving air quality nationwide, a new, up-to-date policy to detail how relevant applications will need to consider the issue of air quality may be needed.

Although arguably a less positive approach than Option AQ1, this is also considered to be **a reasonable alternative**.

Question

54. Which approach do you favour for air quality?

THE ENVIRONMENT

FLOODING

Context

6.138 Given the likely impact of climate change on increasing flood risk, it is important that the GNLP, like current planning policy for Greater Norwich, steers new development away from flood risk areas as far as possible. The plan must ensure that development mitigates against, and if necessary, is adapted to flood risk.

It is also important that statutory bodies and undertakers have full regard to flood risk and provide clear advice to the local planning authorities to enable them to assess planning applications.

6.139 To achieve this, the NPPF states that LPAs should take “full account” of flood risk⁹⁵ and requires local plans to “take account of climate change over the longer term, including factors such as flood risk”.⁹⁶ It also makes it clear how local plans should consider the assessment, and implications, of flood risk in seeking to steer development to areas with the lowest probability of flooding⁹⁷, with the Planning Practice Guidance providing much more detail.

6.140 Current Greater Norwich flood risk policy⁹⁸ emphasises that mitigation of any existing risk to be undertaken through good design and the use of sustainable drainage (SuDS) techniques. More detailed flood risk policies are in development management documents. Monitoring results over the years since 2011/12 show that no developments have been approved against the advice of the Environment Agency.

6.141 The main flood-related issue raised at the Issues workshops was the need to consider a whole-catchment approach to water management – such as flood storage in more upstream parts of river catchments.

6.142 A Stage 1 Strategic Flood Risk Assessment (SFRA) has been carried out for the Greater Norwich area, alongside the production of SFRAs for Great Yarmouth, North Norfolk and King’s Lynn and West Norfolk Borough Council by the same consultancy, JBA. The SFRA has been prepared with the ongoing involvement of Norfolk County Council (as Lead Local Flood Authority) and the Environment Agency. It applies the latest climate change allowances to models of river (fluvial) flooding, taking into account existing information on tidal/coastal flooding, groundwater flooding and surface water flooding (amongst other types). The SFRA maps show that some fluvial flood areas have expanded (as would be expected, given that the most recent climate change allowances require higher levels of rainfall and river flow to be taken into account), but there are no major differences compared to the previous (2007)

⁹⁵ Paragraph 94

⁹⁶ Paragraph 99

⁹⁷ Paragraphs 100-102

⁹⁸ JCS policy 1

SFRA that was prepared to inform the JCS. Surface water flooding has been the main type of flooding in Greater Norwich in recent years, caused by intense rainfall overwhelming drainage infrastructure, and the 2017 SFRA details some of these events.

- 6.143 The main fluvial flood risks are along the main rivers (the Wensum, Yare, Waveney and their tributaries), although smaller, non-main rivers can also have areas of risk. Norwich is the area with most (about 11,000) properties at risk of flooding in a 1 in 100-year flood event, and the city was named an Indicative Flood Risk Area by the Environment Agency in July 2017. Surface water flooding is known to be an issue in various settlements, including parts of Norwich, Poringland/Framingham Earl, Harleston, Long Stratton, Acle and Aylsham.
- 6.144 The draft GNLP environment objective is: *To protect and enhance the built and natural environment, make best use of natural resources, mitigate against and adapt to climate change.* The overall vision is relevant too: *To grow vibrant, healthy communities supported by a strong economy and the delivery of homes, jobs, infrastructure and an enhanced environment.*

How should flooding and flood risk be covered in the GNLP?

- 6.145 There is relatively little flexibility in how flood risk should be considered in preparing a local plan. In essence, development should be located away from areas of highest flood risk through the application of the Sequential Test⁹⁹. If, following consideration of the Sequential Test, it is felt that, consistent with wider sustainability objectives, it is not possible for development to be located in lower flood-risk areas, then the Exception Test can be applied¹⁰⁰. Parts of the centre of Norwich are most likely to fall into this category, but other areas of Greater Norwich, where there is brownfield land in town centres, could also do so.
- 6.146 All relevant planning applications¹⁰¹ must be accompanied by a site-specific Flood Risk Assessment. Mitigation of residual flood risk is important, as stated in the NPPF, and where possible, new developments should reduce flood risk overall. The use of SuDS techniques is strongly encouraged by the SFRA, and it also recommends that all relevant applications be accompanied by a Surface Water Drainage Strategy, to show how the design and drainage of a scheme will prevent properties from flooding from surface water. A key issue for the GNLP to consider is the extent to which a whole-catchment approach to flood risk should be practised.

Option

- 6.147 Some LPAs rely on requiring new development to follow the NPPF requirements only. However, as this approach would not meet the clear recommendations of our

⁹⁹ NPPF paragraphs 100 and 101

¹⁰⁰ NPPF paragraph 102

¹⁰¹ As defined in footnote 20 to NPPF paragraph 103

SFRA, especially to deal with surface water flooding risks, and would risk a lack of co-ordination between sites and a lack of clarity about the long-term maintenance regime for SuDS infrastructure, it is **unreasonable**. Based on national policy and local evidence, a favoured option has been identified:

Option FR1 – Require all relevant applications to undertake a site-specific Flood Risk Assessments and to provide a Surface Water Drainage Strategy showing how any SuDS infrastructure will be maintained in perpetuity

This approach follows NPPF and Greater Norwich SFRA recommendations, requiring flood risk and drainage matters to be considered at the very earliest stages of a scheme's design.

This is **the favoured option**.

Question

55. Do you support the favoured option for flood risk policy?

NATURE CONSERVATION, GREEN INFRASTRUCTURE AND HABITATS REGULATION

ASSESSMENT MITIGATION

Context

- 6.148 Greater Norwich's high quality natural environment is a significant factor in defining the area. Maintaining and enhancing these natural assets provides benefits for existing and new communities. It is important that the impacts of growth on the natural environment are mitigated both for environmental reasons and because the character of the area is key to the local economy, supporting successful growth.
- 6.149 Greater Norwich has a number of nature conservation sites that are protected under international legislation or agreements – Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites. In addition, the Norfolk and Suffolk Broads has a status equivalent to that of a National Park. Other sites are designated nationally, principally Sites of Special Scientific Interest (SSSIs), and a variety of habitats and species are protected under the 1981 Wildlife and Countryside Act.
- 6.150 Green infrastructure (GI) is defined in the NPPF Glossary as *“a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities”*. Section 11 of the NPPF is entitled *Conserving and Enhancing the Natural Environment* and details the main national policies on environmental protection, which include a range of requirements, such as planning for the creation, protection enhancement and management of green infrastructure and biodiversity¹⁰². The NPPF also says that “Great weight” should be given to conserving the landscape and scenic beauty of the Broads¹⁰³ and criteria-based policies should be developed which will distinguish between the hierarchy of designated sites¹⁰⁴. This is important to the GNLP as development and recreation and tourism pressure on the Broads is significant.
- 6.151 Current Greater Norwich policies¹⁰⁵ cover the protection of nationally and internationally designated nature conservation sites, and promotes improvements to open spaces, green infrastructure and biodiversity. The proposed Green Infrastructure Network for Greater Norwich¹⁰⁶ is a map showing the key existing and planned areas of protection and improvement. The three districts all have individual development management policies protecting lower-tier designated nature conservation sites.
- 6.152 The Habitat Regulations Assessment (HRA) for the JCS highlighted the particular pressures on the Broads, and various mitigation measures were identified as being required, including buffer zones and alternative destinations to help manage visitor pressure on the Broads and other nearby nature conservation sites. The need for

¹⁰² Paragraph 114

¹⁰³ Paragraph 115

¹⁰⁴ Paragraph 113

¹⁰⁵ JCS policies 1 and 2

¹⁰⁶ In JCS Policy 1

mitigation measures were identified for the homes allocated in the NEGТ in Broadland¹⁰⁷ with greater detail considered in the now-adopted Growth Triangle Area Action Plan.

- 6.153 The AMRs show that a number of improvements to the GI network have been delivered, or are planned to be delivered, as new development has been permitted and delivered. The condition of designated nature conservation sites has generally improved since 2011/12 too, although it remains below target for SSSIs.
- 6.154 Attendees at the Issues workshops believed there to be a deficiency of green infrastructure in Greater Norwich, focussing particularly on the availability of accessible semi-natural green spaces, such as country parks. The problem of funding and maintenance of such spaces was recognised, but self-funding (through car-parking charges, on-site café etc.) were identified as options. Improved links to GI outside Greater Norwich were also identified as being important.
- 6.155 Various pieces of evidence base work have been undertaken, or are still underway, in relation to nature conservation and GI. A *Recreation Impacts Study – Visitor Surveys at European Protected Sites* was carried out across Norfolk and published in 2017. The study concludes that, in Greater Norwich, tourism and pressure from a growing population of local residents will continue to increase, especially in the Broads. Further work will be likely to need to be done to investigate the capacity of specific sites to absorb visitor pressure. Working with the other Norfolk LAs to investigate cumulative impacts and potential mitigation measures will therefore be important.
- 6.156 A Green Infrastructure Mapping Project is also underway across the whole of Norfolk. When complete later in 2017 this should allow the expansion of the current Greater Norwich GI network, which is viewed as an exemplar project, into the rest of Norfolk and the adjoining counties.
- 6.157 The HRA for the GNLP, which must be prepared to accompany any local plan, is also underway. The HRA screening report identifies different types of impact and mitigation for SAC, SPA and Ramsar sites. Potential impacts on European-designated sites identified include:
- Increased urbanisation of the countryside leading to fly tipping, littering or predation by domestic animals;
 - Increased ground water abstraction, leading to detrimental impacts on biodiversity through:
 - changing the balance of freshwater to saline water in coastal wetlands;
 - depleting river flows and increased potential for saline water incursion;
 - depleting river flows with the effect of reducing dilution of pollutants and nutrients;
 - reduced ground water inputs/irrigation of fen areas

¹⁰⁷ JCS Policy 10

- Chemical release or water recycling plant failure resulting in pollution from waste water discharges;
- Increased emissions from vehicular traffic;
- Disturbance and trampling from people and especially dog walkers where nutrient enrichment from dog excrement is also an issue.

6.158 The draft GNLP environment objective is: *To protect and enhance the built and natural environment, make best use of natural resources, mitigate against and adapt to climate change.* The overall vision is relevant too: *To grow vibrant, healthy communities supported by a strong economy and the delivery of homes, jobs, infrastructure and an enhanced environment.*

How should nature conservation and Green Infrastructure be covered in the GNLP?

6.159 There are a large number of internationally designated nature conservation sites in the area both in the Broads and in Greater Norwich itself, such as the Wensum Valley. Legally, the GNLP will need to include a policy to ensure that new development does not have a negative impact on these designated sites. Without mitigation measures, some housing sites could probably not be allocated or permitted. Potential impacts on the designated nature conservation sites will depend partly on the growth distribution options and the housing sites chosen.

Options

6.160 Two possible approaches are suggested for protecting the designated sites:

Option NC1 – Require housing developments to provide additional green space on-site to address the impact of housing growth on designated nature conservation sites

This approach could be particularly appropriate for new development near designated sites, especially near the Broads. Such developments are likely to attract regular visitors (especially dog-walkers) to designated sites, adding to pressure there. Larger developments could provide “**Suitable Alternative Natural Green Space**” (SANGS) on their sites; smaller developments would have to make payments to provide the SANGS elsewhere.

This is **a reasonable alternative**.

Option NC2 – Require housing developers to make payments so that impacts on the designated nature conservation sites are addressed.

Payments could be used to fund measures such as: relocating parking, improved signage, wardens, other management measures, directing visitors to less sensitive parts of the sites or other locations and reducing vehicular access to designated sites.

This is also **a reasonable alternative**. Implementation will require agreement and work with other authorities and organisations, particularly the Broads Authority.

Question

56. Which option do you support?

6.161 It will also be essential that the multi-functional GI network established in the JCS¹⁰⁸, which is intended to provide a long term focus for investment, continues to be developed. Parts of this network have been added to or improved in recent years, in many cases with CIL funding. Greater Norwich's approach to developing the GI network is planned to be extended county-wide through the NSF.

Question

57. Do you think any changes should be made to the Green Infrastructure network?

¹⁰⁸ See JCS page 33

LANDSCAPE

Context

- 6.162 The varied landscapes of Greater Norwich, as well as the unique landscape of the neighbouring Broads, are a major asset for the area. Therefore it is essential that new development is focussed in areas where it will minimise impacts on the landscape and respects its character, being designed to take account of and enhance landscape settings.
- 6.163 The NPPF states that valued landscapes should be protected and enhanced¹⁰⁹, and LPAs are required to set criteria-based policies against which development proposals potentially affecting protected landscape areas¹¹⁰. A “hierarchy” approach to policies should be practised, reflecting the distinctions between national and local landscape designations, with intrinsically dark landscapes protected from light pollution through effective planning policies¹¹¹. Where appropriate, landscape character assessments should be prepared, along with historic landscape character assessments¹¹².
- 6.164 Various landscape character assessments have previously been undertaken to support local plan documents. There are no nationally-designated landscape areas in Greater Norwich, although the Broads Authority area has status equivalent to a National Park, and there is thus a statutory duty to “conserve and enhance the natural beauty, wildlife and cultural heritage of the area”. Current Greater Norwich policy¹¹³ highlights that there are five distinct countryside character areas. Various areas are of particular historic and cultural significance, and there are sensitivities on the urban edges of Norwich and market towns. The Broads area is clearly of particular significance.
- 6.165 Current policy states the importance of maintaining important “Strategic Gaps”¹¹⁴ between Wymondham and Hethersett and between Hethersett and Cringleford. The precise geography of these gaps is out in the South Norfolk Development Management Policies Document¹¹⁵. JCS Policy 2 also emphasises the urban/rural transition and the treatment of key “gateways”. South Norfolk policy¹¹⁶ defines four planning policy tools to protect the landscape setting of Norwich:

- 1) The Norwich Southern Bypass Landscape Protection Zone (NSBLPZ - much of the A47 corridor around the south of Norwich);

¹⁰⁹ Paragraph 109

¹¹⁰ Paragraph 113

¹¹¹ Paragraph 125

¹¹² Paragraph 170

¹¹³ JCS Policy 2

¹¹⁴ JCS Policy 10

¹¹⁵ Policy DM 4.7 and the Proposals Map

¹¹⁶ Policy DM 4.6

- 2) Key Views (long-distance views into Norwich from the south-west and south-east);
 - 3) Undeveloped Approaches (various road and rail corridors with a distinctive rural character); and
 - 4) Gateways (distinct landscape/townscape changes which mark the “arrival” into Norwich.) The Norwich Local Plan also identifies key gateways, both on the edge of the city council area, and on the edge of the city centre.
- 6.166 Finally, Rural River Valleys and Urban Valley Fringe landscape areas are identified as having special qualities¹¹⁷, with the Norwich policies recognising the significance of the Wensum and Yare valleys in landscape terms¹¹⁸.
- 6.167 Broadland policies¹¹⁹ focus on its Landscape Character Assessment SPD, and the protection of gaps between settlements, although these are not formally designated as Strategic Gaps.
- 6.168 The Broadland North East Growth Triangle AAP has a policy¹²⁰ protecting an area either side of the NDR from inappropriate development. This is similar to the A47 southern by-pass protection zone in the South Norfolk Local Plan.
- 6.169 The AMRs show that landscape protection policies generally work well. Relatively few applications that might adversely affect key landscape designations tend to be made, because of the high chance of refusal, and those that are tend to have significant mitigation requirements. More generally, landscape character is an important consideration in a number of planning applications, and the layout and design of schemes need to take into account the effect of landscape character.
- 6.170 One major housing application within the Wymondham-Hethersett Strategic Gap was approved on appeal by the Secretary of State in 2016, comprising about 12 hectares of land (up to 300 dwellings), and two small applications in one of the Strategic Gaps were approved by South Norfolk Council.
- 6.171 At the Issues workshops key valley forms and geological/geomorphological landforms were felt to need appropriate protection, including some undesignated sites. Some attendees also asserted that a robust assessment of the need for, and extent of, any Strategic Gaps should be undertaken, particularly in locations where their existence might prevent the delivery of much needed housing.
- 6.172 The draft GNLP environment objective is: *To protect and enhance the built and natural environment, make best use of natural resources, mitigate against and adapt to climate change.* The overall vision is relevant too: *To grow vibrant, healthy communities supported by a strong economy and the delivery of homes, jobs, infrastructure and an enhanced environment.*

¹¹⁷ South Norfolk development management policy DM 4.5

¹¹⁸ Policy DM3

¹¹⁹ Policy EN2 *Landscape*

¹²⁰ GT2: *Green Infrastructure*

How should landscape be covered in the GNLP?

- 6.173 Two main areas need to be covered: firstly, landscape character and specific landscape protection policies; and secondly, the need for, and location and extent of, any Strategic Gaps.

Landscape character and protection

- 6.174 The existing landscape character evidence base in Greater Norwich is up-to-date; whilst landscape character can alter over time due to changes caused by new development and differing land management practices, these changes tend to be slow and rarely alter the fundamental character of landscapes.
- 6.175 The slightly different approaches to landscape taken in South Norfolk, Norwich and Broadland could be continued, or a similar approach could to be taken to landscape protection in Broadland as exists in South Norfolk.

Options

Option LA1 – Retain the current South Norfolk Local Plan approach, extending the principles to those parts of Broadland closest to Norwich, including the route of the Norwich Northern Distributor Road.

This approach recognises that maintaining the setting of Norwich in relation to its rural hinterland is important, with the considerable development pressures that exist in fringe areas. It does not mean that development would be inappropriate, but the sensitivity needs to be recognised. Similarly, some key landscape types – particularly the Broads, rural river valleys, and the Yare and Wensum valleys are of particular landscape sensitivity. Some more detailed landscape work would be necessary to identify locations for Key Views, Undeveloped Approaches and Gateways in the Broadland/Norwich transition zone.

This is considered to be **the favoured option**.

Option LA2 – Retain the general current approach to landscape protection in the current three separate local plans

This option recognises there are different policy frameworks dealing with landscape issues in the three districts in current local plans, and that this could be rolled together into the GNLP. This might not enable a more consistent approach to be taken in the GNLP, including a wider consideration of impacts on the Norwich/Broadland boundary, but it is considered to be **a reasonable alternative**.

Question

58. Which of these options do you favour?

Strategic Gaps

- 6.176 Strategic Gaps are not purely a type of landscape designation. They are generally used where there is separation between settlements, and that separation is an important in retaining the identity of separate settlements and, often, in the landscape character of the area.
- 6.177 The two current Strategic Gaps in Greater Norwich were designated after considerable debate and challenge in the adopted South Norfolk development management policies document. Broadland development management policy EN2 highlights the gaps between settlements as one of the landscape characteristics that must be taken into account when considering development proposals, but does not identify and designate any specific Strategic Gaps.

Option

- 6.178 No alternatives have been identified for this issue.

Option SG1 – Assess whether any new locations should be designated as Strategic Gaps.

The two current Strategic Gaps were subject to rigorous debate in the production of the South Norfolk local plan, and are likely to remain a soundly based (notwithstanding that some residential permissions have been allowed in the two Gaps subsequently). The current South Norfolk policy (DM4.7) does not completely prohibit non-agricultural development in the Gap, but is criteria-based. A similar criteria-based policy would appear appropriate in the GNLP, alongside the consideration of the correct geography of the two current Gaps, and any other areas that might now be considered appropriate to be designated as new Strategic Gaps

This is considered to be **the favoured option**.

Question

- 59. Should the GNLP protect additional Strategic Gaps and if so where should these be?**

ENERGY

Context

- 6.179 Local plans must demonstrate a positive strategy to promote the delivery of renewable and low carbon energy¹²¹. There has been a significant growth in renewable energy production in Greater Norwich in recent years, largely from small and large-scale solar installations and wind energy, along with a more limited amount of biomass development. However, recent Government policy and legislation¹²² mean that local plan policies cannot require energy efficiency for dwellings in excess of Building Regulations requirements, and wind turbines can only be developed in areas specifically identified in Local or Neighbourhood Plans.
- 6.180 Current Greater Norwich policy¹²³ requires developers to maximise the use of decentralised and renewable or low carbon energy (DRLCE) sources, with a 'Merton Rule' requirement for sites of 10+ dwellings or 1,000m² of non-residential development to provide 10% of the scheme's expected energy requirements from these and maximise opportunities for sustainable construction. Larger schemes (500+ dwellings or 50,000m² non-residential development) should maximise energy from DRLCE sources.
- 6.181 This has been monitored in the AMR by CO₂ emissions per capita, which have reduced, and by the capacity of renewable energy permitted, which has fluctuated, although permitted development rights mean there may be significant micro-generation installations which are not recorded.
- 6.182 There was considerable discussion of the energy issues at the Issues workshops. Some felt that there should be a push for more rooftop solar/photovoltaics as the recent development of battery technology could enable better and more effective storage of locally-generated renewable electricity.
- 6.183 Wind turbines were believed to sometimes be "imposed" on communities and consequently taking more local control and ownership should be considered, perhaps through Neighbourhood Plans. Others felt that wind power should only be considered offshore, instead of using valuable agricultural land.
- 6.184 Some felt that solar farms should only be allowed on agricultural land of grades 3-5 (i.e. not the highest quality grades 1-2). Others believed that it is unnecessary to have policies on energy use because Building Regulations deal with the issues.

How should energy be covered in the GNLP?

- 6.185 Some evidence suggests that the minimum development size appropriate for decentralised energy is approximately 500 dwellings, but in a densely developed location, decentralised energy can be provided for existing dwellings so the

¹²¹ NPPF Paragraph 97

¹²² Set out in written ministerial statements and elements of the Deregulation Act 2015

¹²³ JCS policy 3

minimum development threshold could perhaps be lower. The “Merton Rule” requirement could potentially be increased but this could end up increasing costs overall, causing reductions in the spending on fabric of the buildings (i.e. for greater energy efficiency). One main issue identified is the limited previous consideration of local grid connections, particularly at strategic employment locations, and the need to consider this at an early stage in the planning process. The capacity of the grid and local grid connections are likely to take on increased importance and are a key Duty to Co-operate issue.

Options

- 6.186 There are two **unreasonable** approaches in this policy area. Not having a policy at all, merely relying on the relying on national and DM policies already adopted by districts is considered to be unacceptable as this option would not conform to the NPPF¹²⁴ requirement for a positive strategy to promote energy from renewable and low carbon sources and to maximise renewable and low carbon energy development.
- 6.187 A second **unreasonable** approach would be to require a higher minima of DRLCE sources than the current JCS – there is no current evidence that this is achievable.

Option EN1: Keep a “Merton” policy approach, but remove sustainable construction content to avoid conflict with recent Government policy changes. Also identify suitable locations for wind and/or solar power.

This option would be a positive step towards helping to meet carbon reduction targets and would meet the requirements of the NPPF.

This is considered to be **the favoured option**.

Question

60. Should option EN1 be included in the GNLP?

¹²⁴ Paragraph 97

WATER

Context

- 6.188 Greater Norwich, like many parts of the south and east of England, experiences low levels of rainfall and is defined by Environment Agency as an area of water stress. At the same time it has and neighbours internationally important water based environmentally protected sites. In addition, the Water Resources Management Plan 2014 emphasises the need for new development to be water efficient throughout the Anglian Water area, promoting water efficiency, enhanced metering and additional leakage control. The Inspectors at the JCS firmly supported a policy approach focussing on water quality and efficiency. It is therefore essential that growth in Greater Norwich addresses water efficiency and quality issues.
- 6.189 The NPPF¹²⁵ states that “Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of water supply and demand considerations”. A requirement for all housing development to have higher levels of water efficiency than the Building Regulations can be set if there is local evidence that it is needed and it will not affect viability.
- 6.190 A water policy, supported by an Advice Note to aid implementation, is included in the JCS and has been encouraged regionally for a number of years, previously through the Regional Spatial Strategy and more recently in the emerging Norfolk Strategic Framework. There needs to be a long term commitment to addressing water issues whilst promoting growth.
- 6.191 Water issues discussed at the Issues workshops included the role of the Building Regulations, capacity in waste water treatment networks (WWTW) and the use of reed-bed filtration techniques. Inclusion of a water policy in the GNLP would help to implement draft plan objectives to promote the timely delivery of infrastructure and to protect and enhance the natural environment, make best use of natural resources, mitigate against, and adapt to climate change.
- 6.192 The current JCS policy requires sufficient infrastructure to be provided to meet the needs of additional growth, whilst at the same time generally promoting water efficiency, protection of water quality and protection of areas of environmental importance. It also mentions specific infrastructure upgrades, including strategic sewers and upgrades to Whitlingham and other WWTW.
- 6.193 Specifically in relation to water efficiency in new housing development, changes to the Building Regulations in 2015 removed the ability to continue to apply the adopted JCS policy requirement of 80 litres per person per day (lpppd). The standard Building Regulations requirement is 125 lpppd, but the 2015 changes continue to

¹²⁵ Paragraph 94

allow for a higher standard of 110 lpppd to be applied, if evidence supports it and it is viable.

- 6.194 Viability of development is not affected by water efficiency requirements. The cost per dwelling of implementing the higher Building Regulations water efficiency standard of 110 lpppd is only £10 and the emerging GNLP viability study has shown that such a low additional cost will have no impact on development viability.
- 6.195 The requirement for water efficiency applies equally to non-housing development, so it is appropriate to continue the JCS approach, supported by an updated Advice Note using BREEAM standards, of requiring non domestic development to be water efficient.
- 6.196 Taking the above into consideration, continuation of the current approach is suitable and no alternatives have been identified for water.

Option

Option W1: Require sufficient infrastructure to meet the needs of additional growth, whilst at the same time promoting water efficiency (using available standards), protection of water quality and areas of environmental importance.

This is the favoured option.

Question

61. Do you support option W1?

COMMUNITIES

Context

- 6.197 The GNLP must provide the policy background to enable new communities to grow which have a range of services, good access, and enable people to lead active and healthy lifestyles. The NPPF¹²⁶ has as a Core Principle that planning should: “Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs. It says that local plans should “promote the retention and development of local services and community facilities in villages such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship”¹²⁷. It also requires that LPAs should “create sustainable, inclusive and mixed communities”¹²⁸ and promotes healthy communities¹²⁹.
- 6.198 Current Greater Norwich policy¹³⁰ covers four main areas: health (including healthy living and care homes needs); crime (designing out crime); education (supporting tertiary education facilities, expansion to/new schools; and community infrastructure and cohesion (new community facilities, libraries and community integration).
- 6.199 The AMRs record a range of indicators for healthy and active living, including obesity, life expectancy and the accessibility to leisure and recreation facilities. There are no clear trends for these indicators in recent years, and recorded crime levels have also fluctuated somewhat. The AMR also records the level of education qualifications – broadly, these have all improved in recent years.
- 6.200 There was general support for the need for healthy communities to be developed at the Issues workshops. Some attendees believed that there is a deficit of GI across Greater Norwich, with accessibility of semi-natural green spaces for residents important.
- 6.201 The draft GNLP communities objective is to grow vibrant, healthy communities giving people a high quality of life in well-designed developments with good access to jobs, services and facilities.

¹²⁶ Paragraph 17

¹²⁷ Paragraph 28

¹²⁸ Paragraph 50

¹²⁹ Section 8

¹³⁰ JCS Policy 7, *Supporting Communities*

Location of affordable housing within sites

- 6.202 The amount of affordable housing secured through Section 106 agreements on normal “market” housing sites is covered in the Housing Delivery section of the GNLP. The provision of affordable housing as part of sites above the affordable housing threshold is an important part of achieving mixed and balanced communities and the location of affordable housing within sites can be important, too.
- 6.203 Affordable housing on a mixed should be “tenure-blind” – in other words, it should be very difficult to tell the affordable housing from external appearance of the building. “Pepper-potting” of affordable houses is the generally preferred approach (i.e. mixing affordable houses with market houses), but it is recognised that for Registered Providers (companies managing affordable houses), there can sometimes be economies of scale in the locating small clusters of affordable houses together. An outcome to avoid is the location of **all** the affordable housing for a development to be located in one part of the site together.

Options

- 6.204 Not setting policy for the distribution of affordable housing across and within housing sites would be **unreasonable**. This is because it would run a significant risk of “affordable only” sections of development sites being created and would be contrary to the NPPF.

Option COM1: Affordable housing should usually be spread evenly across housing sites and should be tenure-blind in appearance.

It is accepted that management scales of efficiency may sometimes militate in favour of small clusters of affordable dwellings rather than individual affordable dwellings. However, overall this approach is to avoid the danger of affordable housing (particularly social/affordable rented) being located away from the main body of ‘market’ housing, thus risking the creation of unmixed and unbalanced local communities. It would not apply “exception” sites (which will be mostly or entirely affordable housing anyway).

This is considered to be **the favoured option**.

Question

62. Do you support option COM1 for the distribution of affordable housing?

Health Impact Assessments

- 6.205 Current policy¹³¹ requires that Health Impact Assessments (HIAs) are undertaken to support “large-scale” housing proposals, with the threshold specified at 500 dwellings in the accompanying advice note. HIAs assess the potential effects of a

¹³¹ JCS Policy 7

scheme on active lifestyles and the health of a population and identify the health care facilities required to support the development. This should help inform the design and layout to best allow for walking, cycling, open space and recreation and mitigate the impacts of vehicular traffic, especially in relation to air quality and noise.

Options

Option COM 2: Require that developers submit a Health Impact Assessment for sites of 500 dwellings plus

The HIA would show how the layout and facilities of new communities would give people the best opportunities to live healthy and active lifestyles and identify the health care facilities required to support the development. Where larger sites are sub-divided, the overall size of the site would be used as the threshold, with an overarching masterplan and/or design code necessary covering the whole site

This is **the favoured option**.

Option COM 3: Do not require that developers prepare and submit a Health Impact Assessment for any scale of development. Instead, only the requirements of the NPPF and any relevant adopted Development Management policies would need to be taken into account. Voluntary HIAs would be welcomed, however, and there could be supporting text even without a policy

This is **a reasonable alternative**.

Question

63. Which option do you support?

Neighbourhood Planning

6.206 Neighbourhood Plans provide local communities with the power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They give local communities the ability to choose where they want new development to take place, to say what new buildings should look like and what infrastructure should be provided. They are prepared in consultation with the local community and be the subject of a local referendum before they are “made” (adopted). They should support the strategic needs set out in the local plan and plan positively to support local development. When made they become part of the development plan and are considered alongside the district local plan when planning applications are determined.

6.207 As of September 2017, a number of neighbourhood plans have been “made” (adopted) in Greater Norwich. For further information on these, see the [Broadland](#) webpage and the [South Norfolk](#) webpage.

6.208 A number of further parishes have been the subject of area designation and plans for these parishes are at various stages of preparation. Neighbourhood plans can be

brought forward at any time and can be developed before or at the same time as the local planning authority is producing its local plan. It is for the local planning authority to work closely with neighbourhood planning groups to minimise any conflicts between policies in the neighbourhood plan and the emerging local plan.

- 6.209 There is an opportunity for local communities to bring forward sites for development in neighbourhood plans in parallel with the developing local plan process and accordance with the emerging level of growth agreed with the local planning authority and share evidence the evidence being prepared by the Local Planning Authority and vice versa. Where there is a “made” neighbourhood plan, the local community will also benefit from enhanced Community Infrastructure Levy contributions. The councils therefore encourage local communities to prepare neighbourhood plans, particularly where those communities are identified for growth. If there is any conflict between plans the decision maker must favour the policy which is contained in the last document to become part of the development plan.
- 6.210 An important part of the assessment of the “Basic Conditions” tests of a Neighbourhood Plan is that the policies of the Neighbourhood Plan are in “general conformity” with the strategic policies contained in the development plan for the area (i.e. the various local plan documents).

Option

Option NP1: Identify which policies in the GNLP are classed as “strategic” for Neighbourhood Planning.

The strategic policies in the GNLP will be identified and set out in a table in supporting text.

This is **the favoured option.**

Question

64. Do you support option NP1? If so, which GNLP policies should be “strategic”?

CULTURE

Context

- 6.211 Culture comes into many aspects of planning. It is of particular significance in Greater Norwich, both due to the current breadth and depth of the cultural offer available and the potential for culture to play an increasing role as our communities grow. The NPPF state that planning should support strategies to improve cultural wellbeing for all, and deliver sufficient community and cultural facilities to meet local needs. Many of the uses that could be classified as 'cultural' facilities are also classified as Town Centre Uses in the NPPF, indicating that a significant element of cultural provision will relate to the strategy for the city and town centres.
- 6.212 Within the JCS culture is specifically contained within Policy 8 'Culture, Leisure & Entertainment'. This clearly places culture as part of the wider 'offer' the Greater Norwich area, with venues and events being seen as bringing economic benefits, related to both visitors and residents, both in terms of direct income generation and spin-off effects for the wider economy. Cultural assets which enhance the local economy include museums, galleries, theatres, sports venues and festivals; specific events and venues mentioned include Norwich City Football Club and the Royal Norfolk Show. The scope of JCS Policy also sets culture within the wider context of the history, architecture and landscape of the Greater Norwich, recognising the multitude of historic buildings such as Norwich Cathedral, Norwich Castle, Blickling Hall and Wymondham Abbey, and the distinctive landscapes of the area. Culture also performs a function in terms of building and maintaining community identity.
- 6.213 The three development management policies documents also contain a number of cultural elements.
- 6.214 Currently there is little evidence from the AMR on the extent to which the existing policy has been used directly, either to support other local plan documents or through the development management process. Whilst the role of culture is referred to in the Norwich and South Norfolk development management policy documents, it is principally in the context of main town centre uses. Currently there are no indicators in the AMR which effectively measure the effectiveness of the current policy.
- 6.215 The Issues workshops had no direct outputs related to culture, the workshop outputs identified a need to build on current employment strengths, and to emphasise the local lifestyle to attract inward investments. Cultural and creative industries are already strong in the Norwich area and the role of the breadth of cultural facilities is a key factor in the high quality of life in the area.
- 6.216 Because of the broad influence of culture in the wider sense, a number of the draft GNLP objectives include elements that are relevant:

- The economy objective makes specific reference to promoting the growth of a '*creative and broad based economy*', which would undoubtedly include the creative and cultural sectors;
- The communities objective emphasises the need '*to grow vibrant, healthy communities*', again this would indicate that protection of cultural assets and the provision of new facilities, in the broadest sense, will be a factor in the delivering this objective; and
- The environment objective includes the protection and enhancement of the built and natural environment.

How should Culture be covered in the GNLP?

6.217 The main question in developing a Culture policy is the extent to which it needs to be set out as a standalone policy within the GNLP, rather than being an integral element of other policies. Because all of the GNLP policies are currently in their formative stages, the extent to which the elements related to culture will be covered remains uncertain. Three reasonable alternatives have been identified:

Options

Option CUL1: Broadly retain the current approach in existing JCS Policy 8 'Culture Leisure and Entertainment'.

This policy would primarily act as a basis to make requirements:

- Future development management policies in terms of open space, design etc.;
- Site Specific elements of this plan or other documents, such as Neighbourhood Plans or Area Action Plans;
- For the protection of particular assets, such the Norfolk Showground.

The potential consequence of continuing with the current policy approach is that there could continue to be some repetition in the GNLP. For example, the current approach includes: the provision of public art and the promotion of innovative design, which are/could also be covered in a design policy; built facilities for leisure, which are/could equally be included in a communities policy; and access to green spaces, country parks and the wider countryside, which are/could be included in an environment or GI policy.

This is **a reasonable alternative**.

Option CUL2: Develop a simplified Culture policy focussing just on the protection, enhancement and provision of facilities.

This policy alternative would focus on the protection, enhancement and provision of facilities specifically for culture i.e. theatres, cinemas, concert venues, galleries, museums and other venues/spaces which are used for cultural events. This option is likely to need consequent development management policies and/or supplementary planning documents to ensure any criteria for the protection of existing facilities are

clearly set out, or for new facilities which might fall outside defined development boundaries of outside the defined city or town centres.

This is **a reasonable alternative**.

Option CUL3: Do not have a specific policy on Culture. This would effectively incorporate all of the current JCS Policy 8 elements into other policies within the GNLP i.e. open space/leisure/community space and building provision within a 'communities' policy; access to the countryside through the GI element of an 'environment' policy; innovative design/public art within a 'design policy'; and protection of entertainment venues and support for creative industries within the 'economy' and/or 'retail centres' policy (for those cultural venues and facilities, such as markets, cinemas, galleries etc. which are classified as Town Centre uses in the NPPF).

For this policy approach to be effective it would be necessary for culture to be a clear underlying theme throughout the plan, noting that it forms an essential element of many different aspects, including the economy, protection and enhancement of existing assets and leisure/recreation time.

This is **a reasonable alternative**.

Question

65. Which option do you support?

THE BROADS

Context

- 6.218 The Broads, which have a status equivalent to a National Park, border various parts of Greater Norwich, mostly along the main rivers of the Bure, Yare and Waveney. The Broads Authority has its own local plan and is the planning authority for most planning applications within its area. Due to the Broads importance, national policy and legislation recognises their special character and nature. The main functions of the Broads Authority **and others** in relation to the Broads¹³² are: conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads and promoting public opportunities to enjoy the special qualities of the Broads. This means that the GNLP is required to contribute to these functions.
- 6.219 Current Greater Norwich policy¹³³ details how planning applications close to, but outside, the Broads area should take into account its special characteristics:

JCS 18 - The Broads

In areas of close proximity to the Broads Authority particular regard will be applied to maintaining and enhancing the economy, environment, tranquillity, setting, visual amenity, recreational value and navigational use of the Broads.

Opportunities will be taken to make better use of the benefits of the Broads, and to support its protection and enhancement while ensuring no detrimental impact on the Broadland SPA, Broadland Ramsar and Broads SAC.

- 6.220 A policy focussing on the Broads needs to be kept, with suggested modifications including:
- Provide greater clarity about the need for the Greater Norwich authorities to have due regard to National Park and Broads objectives¹³⁴;
 - Adding reference to the Broads area's purposes and protected status as well as its conservation designations;
 - Add references to the protection of landscape character in the Broads;
 - Provide greater clarity about how the Greater Norwich authorities should work closely together when considering planning proposals on the boundary with, or near to, the Broads; and
 - Ensure that the policy requires proposals near to the Broads area have regard to the protection of the tranquillity and dark skies of the Broads.
- 6.221 It is important to note that any applications for areas outside the Broads, but which could potentially affect the Broads, would need to take into account the special

¹³² Set out in the Norfolk and Suffolk Broads Act 1998 (as amended)

¹³³ Joint Core Strategy Policy 18 and its supporting text

¹³⁴ This is needed to reflect the Natural Environment and Rural Communities Act 2006 and the Duty to Co-operate

character of the Broads, relevant Broads Local Plan policies and national policies and legislation, irrespective of whether there is a local plan policy covering this matter.

- 6.222 There was relatively little discussion of the Broads at the Issues workshops. However, the need for strong policies to recognise valued landscapes was highlighted, as was adequate provision of and maintenance of GI.
- 6.223 The most relevant objective is the environment objective to protect and enhance the built and natural environment, make best use of natural resources, mitigate against and adapt to climate change.

Option

- 6.224 Given the equivalent National Park status of the Broads and the strong protection set out in legislation and national planning policy for the Broads area, a positive policy approach should be taken.

Option BR1: Have a specific policy covering development proposals close to the Broads, requiring the special characteristics and nature of the Broads area to be taken into account.

The Broads area has long “borders” with the three Greater Norwich districts (particularly Broadland and South Norfolk), and settlements such as Acle, Brundall, Loddon and Wroxham are partly within the Broads. Consideration of the potential implications of planning applications on the Broads from land which is close to, but outside, the Broads area, is therefore important. This is **the favoured option**.

Question

66. Do you support option BR1?

SECTION 7 - MONITORING THE PLAN

Context

- 7.1 Effective monitoring will be central to understanding how well the draft plan's vision and objectives are being achieved. To ensure that the strategy remains on track, the plan will require an effective, appropriate and proportionate monitoring framework to record development progress, assess whether its objectives are being met and gauge the effectiveness of policies, highlighting the need for any policy review at an early stage. Any GNLP policies which are not capable of being monitored effectively may need special justification for inclusion in the plan.
- 7.2 To do this, LPAs are required to publish an AMR. As a minimum, this must cover the preparation and implementation of local plans and report on Duty to Co-operate activities.
- 7.3 Since the JCS was originally adopted in March 2011, monitoring has been undertaken against a range of indicators based on that plan's 12 spatial planning objectives, as well as the separate social, economic and environmental indicators deriving from the JCS sustainability appraisal. The results are published in the Greater Norwich authorities' AMR. As of the last published [AMR](#), which reports on progress for the 2015-16 monitoring year, a total of 53 separate monitoring indicators were used. Monitoring of separate local plan documents in the three districts is included within the overall JCS AMR.

Monitoring of the GNLP

- 7.4 As central and local government resources have reduced in recent years, so monitoring of some contextual plan indicators has also reduced somewhat, with the focus being on key policy information (such as housing and employment land development).
- 7.5 Given that the GNLP will be allocating individual sites, rather than simply setting out strategic development locations as the JCS did, it will be important to ensure that a detailed monitoring framework is in place to record progress on the implementation and delivery of the plan allocations, as well as the strategic area wide policies. This is particularly important in relation to maintaining a five year housing land supply. One specific issue policy may need to cover, however, is the approach that would be taken to help address a shortfall in the five-year supply of deliverable housing land (see below).

Question

67. Are there any current indicators that should be excluded or included in the GNLP monitoring framework?

Shortfall in Housing Land Supply

- 7.6 The NPPF¹³⁵ requires LPAs to “*identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements...*”. Where this cannot be met from existing permissions and unphased allocations in the local plan, allocations phased for delivery later in the plan period should be brought forward. If, despite these steps, it is still not possible to demonstrate a five-year supply of land, then it may be useful for the GNLP to state how additional sites could be considered in a semi-planned way.
- 7.7 The most obvious solution is for the Greater Norwich authorities to turn to the annually-updated Housing and Economic Land Availability Assessment (HELAA). There are likely to be unallocated sites in the HELAA list which could potentially come forward for development. These would have the advantage over completely new sites in that they have already undergone a level of assessment, and so there could be a higher level of certainty of their delivery compared to windfall developments, which are inherently somewhat unpredictable.

Options

- 7.8 One approach would be to not have a specific policy approach in the GNLP on this matter. In the event of a shortfall in housing land supply, the NPPF requires¹³⁶ that the presumption in favour of sustainable development be applied, with reduced weight afforded to “out-of-date” local plan policies. In practical terms, this means that housing applications on unallocated land should not be refused unless the harm would “significantly and demonstrably outweigh the benefits”. However, having no policy would not meet the NPPF requirement¹³⁷ that steps be taken to “boost significantly the supply of housing”. This option is therefore considered to be **unreasonable**.

Option HLS1 – Allow the most appropriate HELAA sites to come forward if there were no 5-year housing land supply

Depending on the extent of the housing land supply shortfall, a shortlist of potentially acceptable sites would be in the annual Housing Land Supply report. There would need to be a surplus of HELAA sites identified, to ensure choice and competition to be able to demonstrate that there was a five-year supply. Criteria would need to be developed against which to assess the HELAA sites. The councils would aim to work with developers and landowners to deliver sites identified through this process.

This is considered to be **the favoured option**.

Option HLS2 – Do a review of the GNLP to allocate more deliverable sites if there were no 5-year housing land supply

¹³⁵ Paragraph 47

¹³⁶ Paragraphs 14 and 49

¹³⁷ Paragraph 47

The NPPF¹³⁸ states that a local plan “can be reviewed in whole or in part to respond flexibly to changing circumstances”, and the HWP suggests that local plans should be reviewed at least every five years. Given the time it takes to prepare or review even a relatively straightforward local plan, this is unlikely to be a quick solution to remedying a housing land supply shortfall, but it is **a reasonable alternative.**

Question

68. Which option do you support?

General question

69. Are there any other issues relating to the GNLPS you would like to raise?

¹³⁸ Paragraph 153

APPENDIX 1 – THE GROWTH OPTIONS

The growth options tables 1 to 6 below divide housing figures into commitment, the plan baseline and how the additional homes from the various options would be broadly distributed, including percentage figures of overall growth. “Conceptual” maps are also provided for each option.

The growth options tables 1 to 6 below use the most up to date information on commitment from April 2017 and group commitment and growth in parishes into planning areas as follows:

	Location	Homes Committed	Parish	Homes Committed
Norwich	Norwich	6,999	Norwich	6,999
Fringe Sectors	West	1,625	Bawburgh	14
			Costessey	706
			Easton	905
			Honingham	0
	South West	2,828	Colney	2
			Cringleford	1,458
			Hethersett	1,295
			Keswick	5
			Little Melton	68
	South	290	Bracon Ash	24
			Ketteringham	0
			Mulbarton	117
			Swainsthorpe	1
			East Carleton	0
			Swardeston	76
			Tasburgh	34
			Newton Flotman	38
	South East I	752	Bixley	60
			Caister St Edmunds	18
			Framingham Earl	73
			Framingham Pigot	0
			Poringland	511
			Stoke Holy Cross	90
	South East II	264	Bramerton	0
			Kirby Bedon	0
			Trowse	264
	East	631	Blofield	465
			Brundall	33
			Great and Little Plumstead	129

			Postwick with Witton	4
	North East	12,976	Spixworth	47
			Old Catton	29
			Rackheath	3
			Sprowston	19
			Thorpe St. Andrew	365
			Growth Triangle	12,513
	North	1,722	Hellesdon	1,377
			Horsford	284
			Horsham St. Faith and Newton St. Faith	61
	North West	297	Drayton	285
			Taverham	12
Main Towns	Aylsham	350	Aylsham	350
	Wymondham	2,674	Wymondham	2,674
			Spooner Row	0
	Diss	319	Diss	269
			Roydon	50
	Long Stratton	1,968	Long Stratton	1,870
			Tharston	98
Harleston	157	Harleston	157	
Key Service Centres	Acle	210	Acle	210
	Wroxham	32	Wroxham	32
	Reepham	173	Reepham	173
	Hingham	53	Hingham	53
	Loddon	206	Loddon	206
			Chedgrave	0
		Service and Other Village	38	Scole
51			Dickleburgh	51
372			Other BDC Village	372
678			Other SNDC Village	678
	Total	35,665	Total	35,665

Option 1 Concentration close to Norwich

The majority of the plan's housing requirement to 2036 is already committed. The total requirement for new allocations is 7,200. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all options include a "baseline position" which provides for 3,900 homes. Therefore there are sites for 3,300 further dwellings to find. Option 1 would concentrate all the 3,300 additional dwellings close to Norwich as urban extensions or in some of the closest villages.

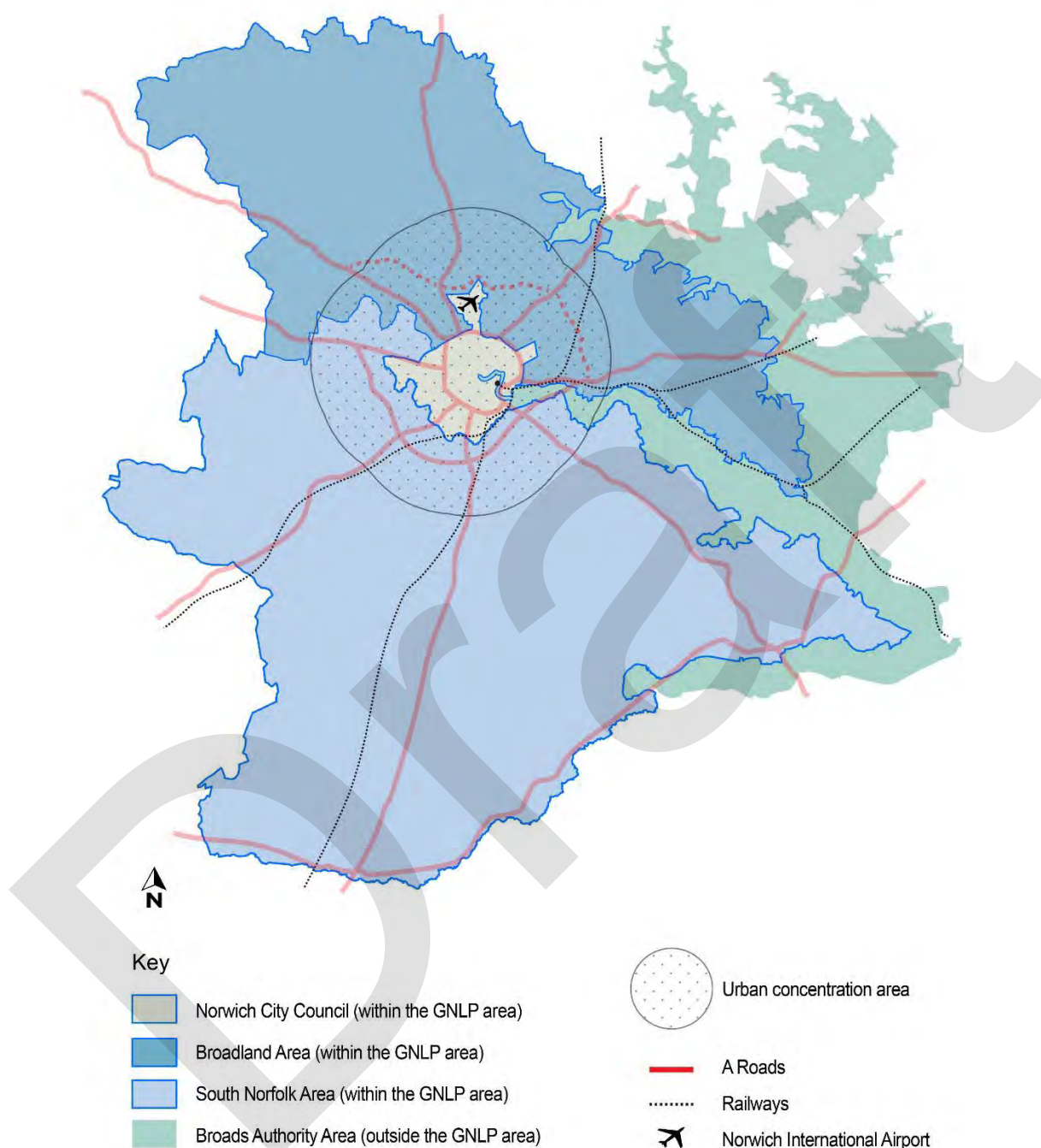
	Commitment ¹³⁹	Baseline	Option 1	Total	Growth %	Distribution of growth option
Norwich	6,999	1,500		8,499	20	The current figure of 1,500 homes in the baseline aims to maximise growth on brownfield sites whilst retaining sites for employment, town centre and open space uses. It will be kept under review as the plan is progressed.
Fringe Sectors	21,381	200 ¹⁴⁰	3,300	24,881	58	Around: 1,000 homes in the north east; 600 in the north and north west; 500 in the west; 1,200 in the south west.
Main Towns ¹⁴¹	5,468	550		6,018	14	There would be no additional homes beyond the baseline in Main Towns, KSCs or Service and Other Villages under this option.
KSCs	674	450		1,124	3	
Service and Other Villages or Village Clusters	1,143	1,200		2,343	5	
Totals	35,665	3,900	3,300	42,865		
		7,200				

¹³⁹ As of April 2017, Service and Other Villages commitment also includes Countryside figures (applies to all options)

¹⁴⁰ Brownfield sites in Broadland urban fringe (applies to all options)

¹⁴¹ Includes Long Stratton which will become a Main Town once anticipated growth is delivered (applies to all options)

Urban Concentration (close to Norwich)



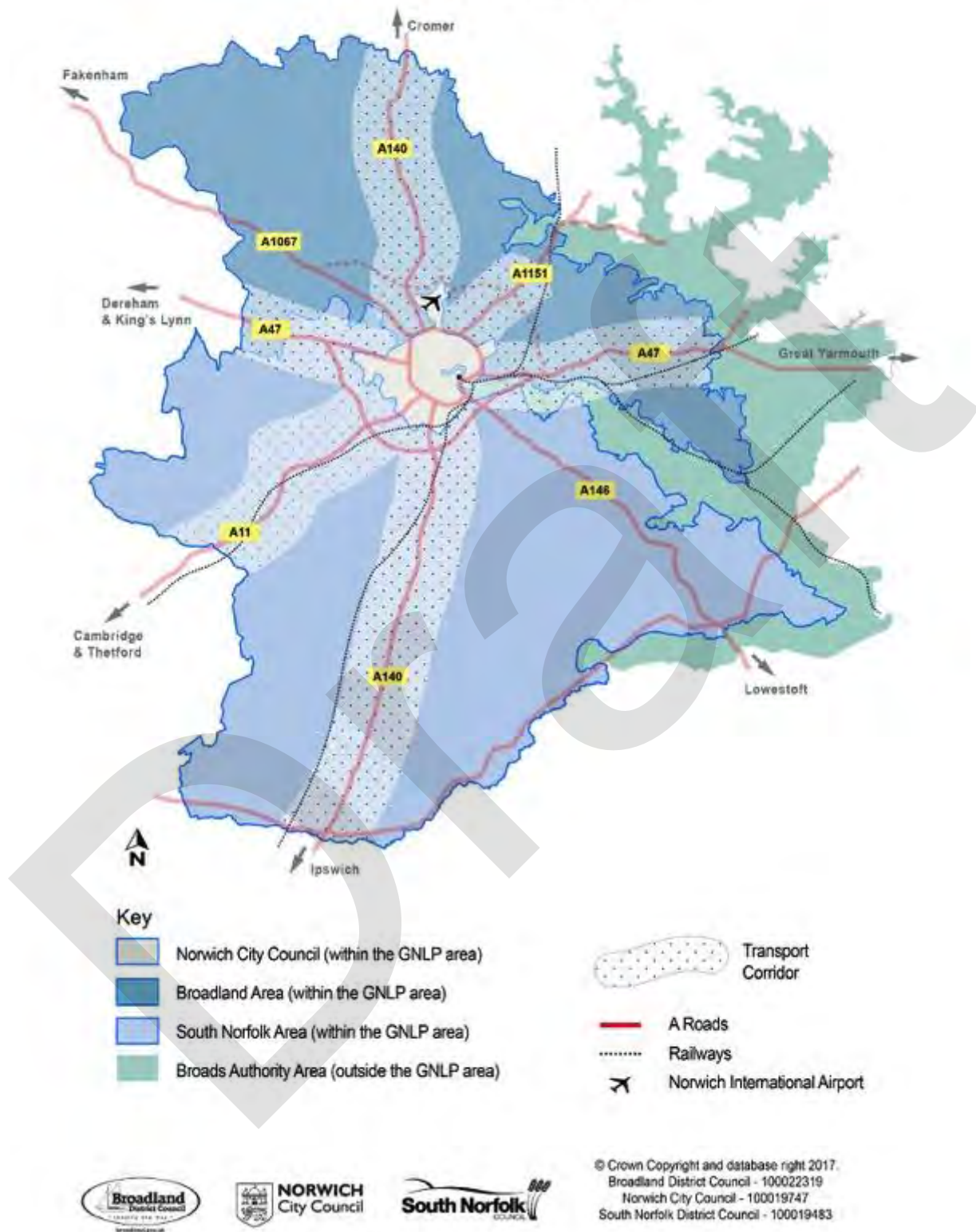
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 Broadland District Council - 100022319
 Norwich City Council - 100019747
 South Norfolk District Council - 100019483

Option 2 Transport Corridors

The majority of the plan's housing requirement to 2036 is already committed. The total requirement for new allocations is 7,200. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all options include a "baseline position" which provides for 3,900 homes. Therefore there are sites for 3,300 further dwellings to find. Option 2 would concentrate all of the additional 3,300 dwellings in the main transport corridors. There is a degree of overlap with Option 1 as urban fringe locations tend to be well served by transport corridors.

	Commitment	Baseline	Option 2	Total	Growth %	Distribution of growth option
Norwich	6,999	1,500		8,499	20	The current figure of 1,500 homes in the baseline aims to maximise growth on brownfield sites whilst retaining sites for employment, town centre and open space uses. It will be kept under review as the plan is progressed.
Fringe Sectors	21,381	200	2,200	23,781	55	Around: 1,000 homes in the north east; 200 in the north and north west; 500 in the west; 500 in the south west. Due to existing commitment and environmental constraints associated with the Broads, there would be no growth in this option above the baseline in the A47 (E) corridor.
Main Towns	5,468	550	1,100	7,118	17	The remaining 1,100 homes would be predominantly allocated to Wymondham in the A11 Corridor and to Diss, possibly including villages on the A140 (S) (other than Long Stratton where there are significant constraints to growth beyond current commitments).
KSCs	674	450		1,124	3	Other than possibly in villages on the A140 (S) near Diss, there would be no additional homes in KSCs or Service and Other Villages beyond the baseline under this option.
Service and Other Villages or Village Clusters	1,143	1,200		2,343	5	
Totals	35,665	3,900	3,300	42,865		
		7,200				

Transport Corridors

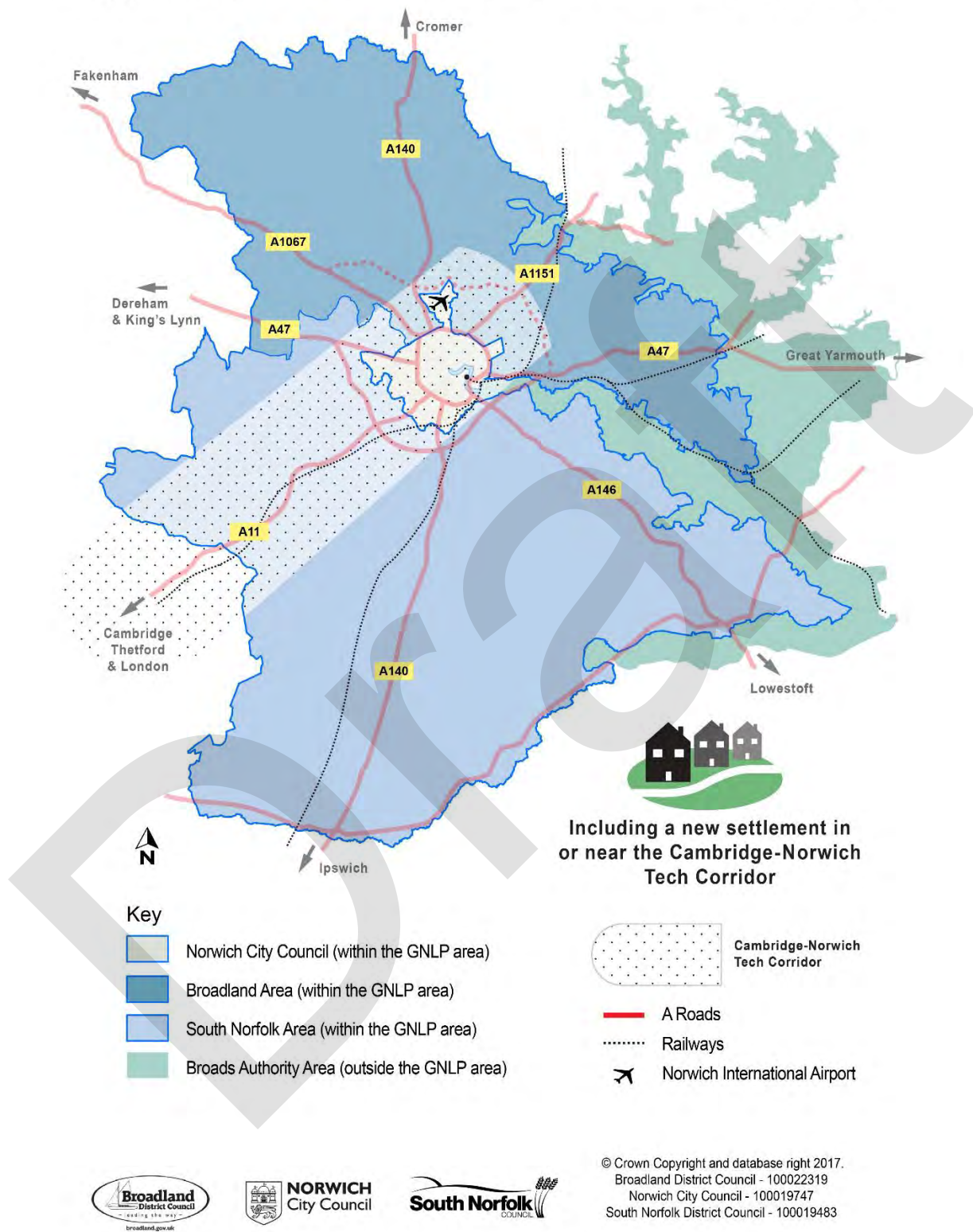


Option 3 Supporting the Cambridge Norwich Tech Corridor

The majority of the plan's housing requirement to 2036 is already committed. The total requirement for new allocations is 7,200. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all options include a "baseline position" which provides for 3,900 homes. Therefore there are sites for 3,300 further dwellings to find. Option 3 would concentrate the great majority of the additional 3,300 dwellings in the A11 corridor, with significant growth in the south west fringe, Wymondham and a new settlement in or near the corridor.

	Commitment	Baseline	Option 3	Total	Growth %	Distribution of growth option
Norwich	6,999	1,500		8,499	20	The current figure of 1,500 homes in the baseline aims to maximise growth on brownfield sites whilst retaining sites for employment, town centre and open space uses. It will be kept under review as the plan is progressed.
Fringe Sectors	21,381	200	2,000	23,581	55	Around: 500 dwellings in the west (which lies between the NRP and the Food Enterprise Zone, close to the A11 corridor); 1,500 in the south west on the A11 corridor.
Main Towns	5,468	550	700	6,718	16	The additional 700 homes would be predominantly allocated to Wymondham in the A11 Corridor rather than the other Main towns.
KSCs	674	450	100	1,224	3	The 100 additional homes in KSCs beyond the baseline would most likely be allocated to Hingham, which already has high tech businesses and is close to the A11 corridor.
Service and Other Villages or Village Clusters	1,143	1,200		2,343	5	There would be no additional homes in Service and Other villages beyond the baseline under this option.
New Settlement			500	500	1	There would be a new settlement in or near the A11 corridor under this option.
Totals	35,665	3,900	3,300	42,865		
		7,200				

Supporting the Cambridge-Norwich Tech Corridor

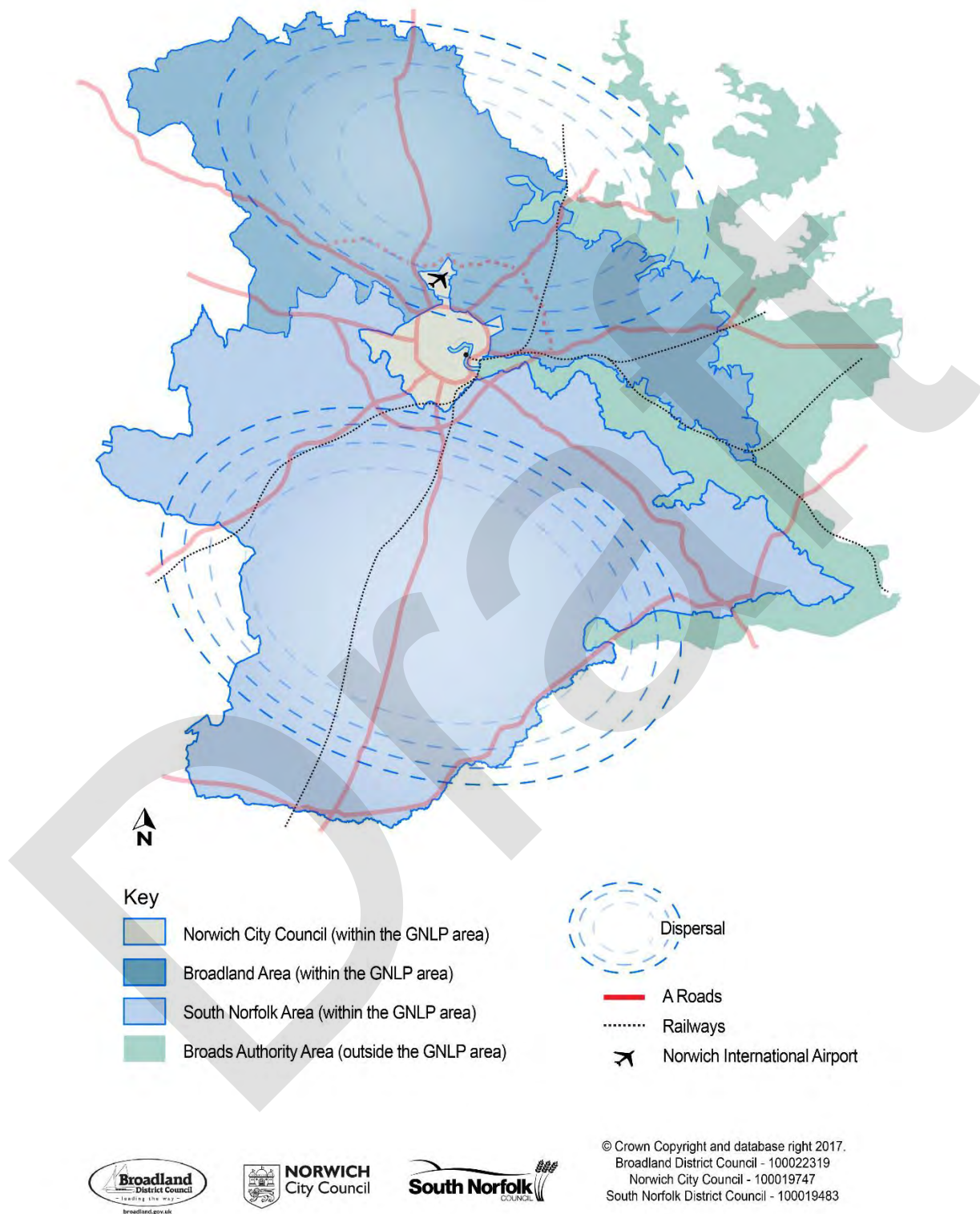


Option 4 Dispersal

The majority of the plan's housing requirement to 2036 is already committed. The total requirement for new allocations is 7,200. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all options include a "baseline position" which provides for 3,900 homes. Therefore there are sites for 3,300 further dwellings to find. Option 4 provides high levels of dispersal to villages while also putting a limited amount of growth in the Norwich fringe parishes and the A11 corridor.

	Commitment	Baseline	Option 4	Total	Growth %	Distribution of growth option
Norwich	6,999	1,500		8,499	20	The current figure of 1,500 homes in the baseline aims to maximise growth on brownfield sites whilst retaining sites for employment, town centre and open space uses. It will be kept under review as the plan is progressed.
Fringe sectors	21,381	200	350	21,931	51	Around: 100 homes in the north and north west; 100 in the west; 150 in the south west.
Main Towns	5,468	550	650	6,668	16	The large majority of the option's 650 homes would be distributed to Wymondham, Diss and possibly to Harleston.
KSCs	674	450	400	1,524	4	The large majority of the option's 400 homes would be likely to be distributed to the KSCs in South Norfolk (Loddon, Hingham and Poringland).
Service and Other Villages or Village Clusters	1,143	1,200	1,900	4,243	10	The distribution of growth between these villages would be dependent on a range of factors including availability of sites, location, access to services and deliverability.
Totals	35,665	3,900	3,300	42,865		
		7,200				

Dispersal

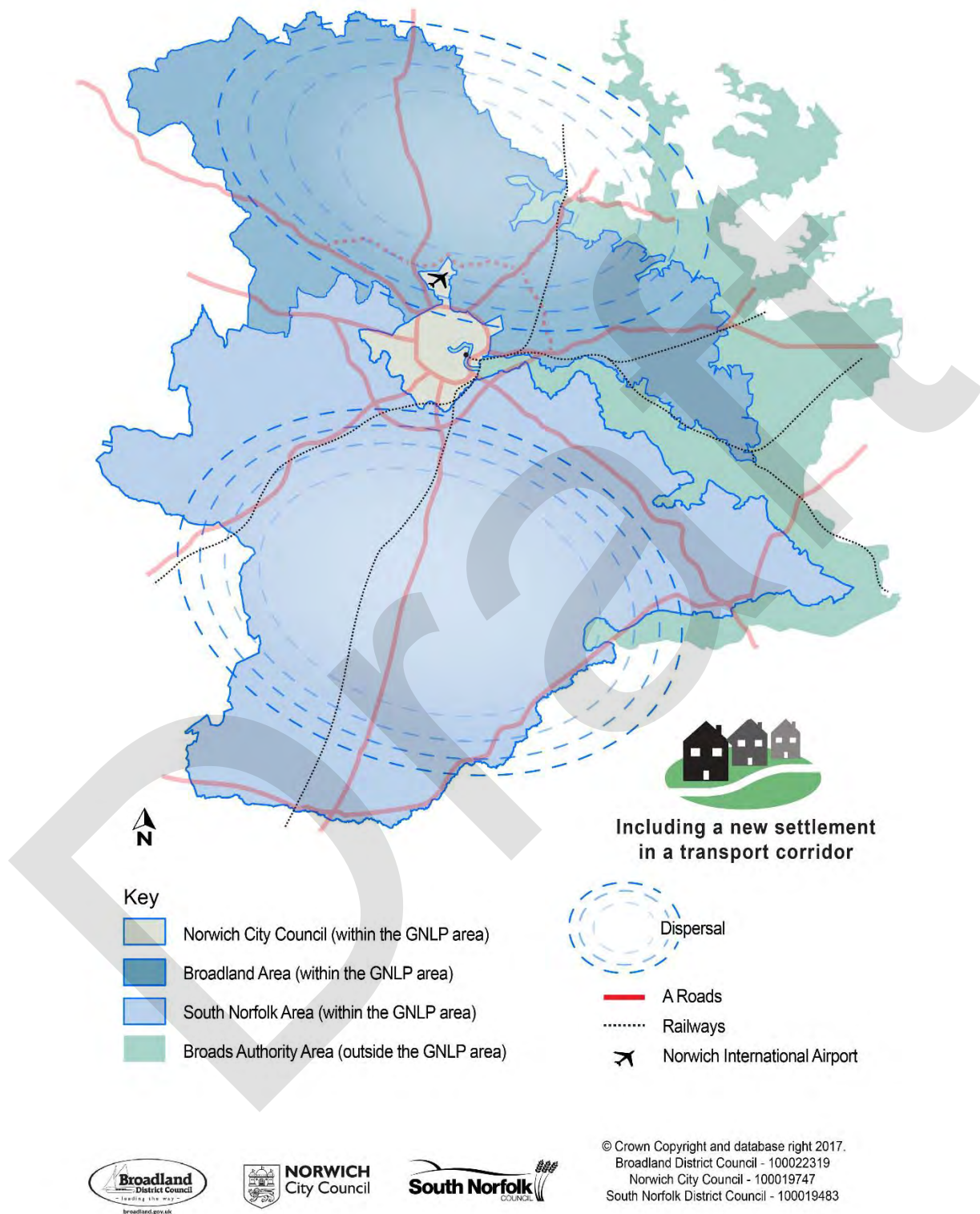


Option 5 Dispersal plus New Settlement

The majority of the plan's housing requirement to 2036 is already committed. The total requirement for new allocations is 7,200. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all options include a "baseline position" which provides for 3,900 homes. Therefore there are sites for 3,300 further dwellings to find. Option 5 is similar to Option 4 in that it provides high levels of dispersal to villages while also putting a limited amount of growth in the Norwich fringe parishes and the A11 corridor. It differs to Option 4 in that it diverts some of the village growth to a new settlement.

	Commitment	Baseline	Option 5	Total	Growth %	Distribution of growth option
Norwich	6,999	1,500		8,499	20	The current figure of 1,500 homes in the baseline aims to maximise growth on brownfield sites whilst retaining sites for employment, town centre and open space uses. It will be kept under review as the plan is progressed.
Fringe Sectors	21,381	200	350	21,931	51	Around: 100 homes in the north and north west; 100 in the west; 150 in the south west.
Main Towns	5,468	550	650	6,668	16	The large majority of the option's 650 homes would be likely to be distributed to Wymondham, Diss and possibly Harleston.
KSCs	674	450	400	1,524	4	The large majority of the option's 400 homes would be likely to be distributed to the KSCs in South Norfolk (Loddon, Hingham and Poringland).
Service and Other Villages or Village Clusters	1,143	1,200	1,400	3,743	9	The distribution of growth between these villages would be dependent on a range of factors including availability of sites, location, access to services and deliverability.
New Settlement			500	500	1	A new settlement in a transport corridor
Totals	35,665	3,900	3,300	42,865		
		7,200				

Dispersal plus new Settlement

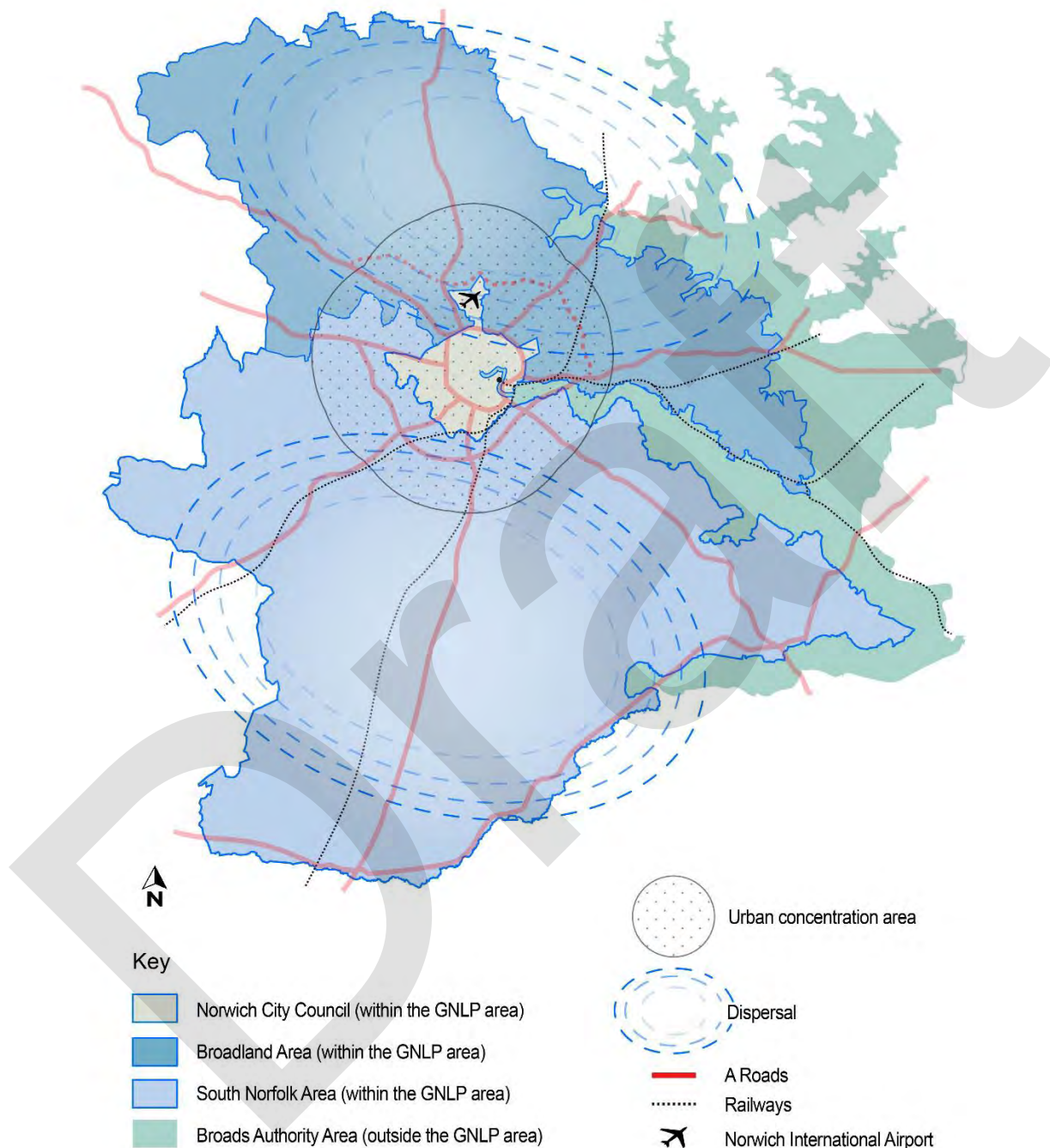


Option 6 Dispersal plus Urban Growth

The majority of the plan's housing requirement to 2036 is already committed. The total requirement for new allocations is 7,200. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all options include a "baseline position" which provides for 3,900 homes. Therefore there are sites for 3,300 further dwellings to find. Option 6 provides higher levels of dispersal to villages while putting significant growth in the Norwich fringe parishes, particularly in the north east and the west fringe.

	Commitment	Baseline	Option 6	Total	Growth %	Distribution of growth option
Norwich	6,999	1,500		8,499	20	The current figure of 1,500 homes in the baseline aims to maximise growth on brownfield sites in the urban area whilst retaining sites for employment, town centre and open space uses. It will be kept under review as the plan is progressed.
Fringe Sectors	21,381	200	1,900	23,481	55	Around: 1,000 homes in the north east; 200 in the north and north west; 500 in the west; 200 in the south west.
Main Towns	5,468	550	150	6,168	14	The option's 150 homes would be likely to be distributed to Wymondham, Diss and possibly Harleston.
KSCs	674	450	150	1,274	3	The large majority of the option's 400 homes would be likely to be distributed to the KSCs in South Norfolk (Loddon, Hingham and Poringland).
Service and Other Villages or Village Clusters	1,143	1,200	1,100	3,443	8	The distribution of growth between these villages would be dependent on a range of factors including availability of sites, location, access to services and deliverability.
Totals	35,665	3,900	3,300	42,865		
		7,200				

Dispersal plus Urban Growth



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APPENDIX 2 - JCS DEFINITION OF NORWICH CITY CENTRE



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APPENDIX 3 – SERVICE, OTHER VILLAGES AND SMALLER RURAL COMMUNITIES for OPTION SH1

DEFINING CRITERIA

Service Village - a Service Village must have:

Either access to four key services **accessible primary school***, village hall, food shop and journey to work by public transport).

Or availability of at least six services from a menu of 12, **which must include an accessible primary school***. The other services are: **post office, village hall; food shop; pub; pre-school facilities; petrol station; outdoor recreation; community groups; employment; healthcare facility; journey to work by public transport.**

If the range of services in a settlement is not sufficient to meet the above criteria, the categorisation is as follows:

Other Village with accessible primary school: has at least three services from above list of 12 including village hall and accessible primary school.

Other Village: has at least three services from above list of 12 including village hall (but no accessible primary school).

Small Rural Community (SRC): has three services or less from above list, and no village hall or accessible primary school.

***Note:** For both Service and Other villages, a settlement was classified as having an accessible primary school if the school was within 2 miles from the centre of the settlement, and accessible the whole way from the outskirts of the settlement via a pavement.

LOWER TIERS OF THE SETTLEMENT HIERARCHY

	Broadland	South Norfolk
Service Village	Blofield Heath, Buxton, Cantley, Cawston, Coltishall (with Horstead), Foulsham, Freethorpe, Gt and Lt Plumstead, Hainford, Hevingham, Horsford, Horsham and Newton St Faith, Great Witchingham (Lenwade), Lingwood (and Burlingham), Reedham, Salhouse, South Walsham, Spixworth	Aslacton and Great Moulton, Barford, Barnham Broom, Bressingham, Brooke, Bunwell, Burston, Dickleburgh, Ditchingham, Earsham, Fornsett (St. Peter & St. Mary), Gillingham, Hales (including part in Heckingham parish), Hempton, Kirby Cane (including part in Ellingham parish), Little Melton, Mulbarton and Bracon Ash, Morley, Needham, Newton Flotman, Pulham Market, Pulham St Mary, Rockland St Mary, Roydon, Saxlingham Nethergate, Scole, Seething, Stoke Holy Cross, Surlingham, Tacolneston, Tasburgh, Thurton (including part in Ashby St Mary parish), Thurlton and Norton Subcourse, Tivetshall St Mary & St Margaret, Wickelwood, Wreningham, Woodton (including part within Bedingham parish), Yelverton (including part in Alington parish)
Other Village (with accessible primary school)	Frettenham, Marsham, Strumpshaw.	Alburgh, Bawburgh, Broome, Carleton Rode, Harwick, Tharston & Hapton (excluding part adjacent to Long Stratton), Winfarthing, Spooner Row.

Other Village	Felthorpe, Halvergate, Honingham, Stratton Stawless, Upton with Fishley, Weston Longville, Woodbastwick.	Ashwellthorpe, Bergh Apton, Brockdish, Burgh St Peter (including parts in Wheatacre & Aldeby), Denton, Geldeston, Gissing, Hedenham, Keswick, Ketteringham, Langley Street, Marlingford & Colton, Shotesham, Starston, Swainsthorpe, Swardeston, Tibenham, Topcroft Street, Wacton, Wortwell.
Smaller Rural Communities	Alderford, Attlebridge, Beighton, Belaugh, Blickling, Booton, Brampton, Brandiston, Burgh & Tuttington, Crostwick, Guestwick, Haveringland, Hemblington, Heydon, Little Witchingham, Morton on the Hill, Oulton, Postwick with Witton, Ringland, Salle, Swannington, Themelthorpe, Wood Dalling.	Aldeby, Bixley, Bramerton, Caistor St Edmund, Carleton St Peter, Claxton, Deopham, East Carleton, Flordon, Framingham Pigot, Great Melton, Haddiscoe, Hellington, Heywood, Holverston, Howe, Kimberley and Carleton Forehoe, Kirby Bedon, Kirstead, Morningthorpe & Fritton, Mundham, Raveningham, Runhall, Shelfanger, Sisland, Stockton, Thwaite, Toft Monks, Wheatacre, Wrampingham.
Changes from JCS	<p>Other Village to Service Village: Cantley, Hainford, Hevingham</p> <p>Smaller Rural Community to Other Village: Felthorpe, Halvergate, Honingham, Stratton Stawless, Upton with Fishley, Weston Longville, Woodbastwick.</p>	<p>Other Village to Service Village: Bressingham, Burston, Forncett (St. Peter & St. Mary), Morley, Needham, Tivetshall St. Mary & St. Margaret.</p> <p>Service Village to Other Village (with accessible primary school): Alburgh, Broome, Carleton Rode, Spooner Row.</p> <p>Smaller Rural Community to Other Village (with accessible primary school): Tharston & Hapton (excluding part adjacent to Long Stratton).</p> <p>Service Village to Other Village: Ashwellthorpe, Bergh Apton, Geldeston, Swardeston, Wortwell.</p> <p>Smaller Rural Community to Other Village: Gissing, Wacton</p> <p>Service Village to Smaller Rural Community: Bramerton,</p> <p>Other Village to Smaller Rural Community: Aldeby, Caistor St Edmund, Claxton, Flordon, Great Melton, Haddiscoe,</p>

DATA FOR LOWER TIERS OF THE SETTLEMENT HIERARCHY

Broadland Settlements	Core Services				Secondary Services								Status in Settlement Hierarchy
	Primary School	Village Hall	Food Shop	Journey to Work by Public Transport	Post Office	Pub	Pre-School	Petrol Station	Outdoor Recreation	Community Groups	Employment Opportunities	Healthcare Facility	
Alderford	x	x	x	x	x	x	x	x	x	x	✓	x	Smaller Rural Community

Attlebridge	x	✓	x	✓	x	x	x	x	x	x	x	x	Smaller Rural Community
Beighton	x	✓	x	x	x	x	x	x	✓	x	x	x	Smaller Rural Community
Belaugh	x	x	x	✓	x	x	x	x	x	x	x	x	Smaller Rural Community
Blickling	x	✓	x	x	x	✓	x	x	x	x	x	x	Smaller Rural Community
Blofield Heath	✓	✓	✓	✓	x	✓	✓	x	✓	✓	✓	x	Service Village
Booton	x	x	x	x	x	x	x	x	x	x	x	x	Smaller Rural Community
Brampton	x	✓	x	✓	x	x	x	x	x	x	x	x	Smaller Rural Community
Brandiston	x	x	x	x	x	x	x	x	x	x	x	x	Smaller Rural Community
Burgh and Tuttington	x	✓	x	x	x	x	x	x	x	x	x	x	Smaller Rural Community
Buxton	✓	✓	✓	✓	x	✓	✓	x	✓	✓	x	✓	Service Village
Cantley	✓	✓	x	✓	x	✓	✓	x	x	x	✓	x	Service Village
Cawston	✓	✓	✓	✓	x	✓	✓	✓	✓	✓	✓	✓	Service Village
Coltishall (with Horstead)	✓	✓	✓	✓	x	✓	✓	✓	✓	✓	✓	✓	Service Village
Crosthewick	x	x	x	✓	x	x	x	x	x	x	x	x	Smaller Rural Community
Felthorpe	x	✓	x	x	x	✓	x	✓	✓	x	x	x	Other Village
Foulsham	✓	✓	✓	x	x	✓	✓	x	✓	✓	✓	x	Service Village
Freethorpe	✓	✓	x	✓	x	✓	x	✓	✓	✓	x	x	Service Village
Frettenham	✓	✓	x	✓	x	✓	x	x	✓	x	x	x	Other Village (with accessible Primary School)
Gt & Lt Plumstead	✓	✓	✓	✓	x	✓	✓	✓	x	x	✓	x	Service Village

Great Witchingham (Lenwade)	✓	✓	✓	✓	x	✓	x	x	✓	x	✓	✓	Service Village
Guestwick	x	✓	x	x	x	x	x	x	✓	x	x	x	Smaller Rural Community
Hainford	✓	✓	x	✓	x	✓	✓	x	✓	✓	x	x	Service Village
Halvergate	x	✓	x	x	x	✓	x	x	✓	✓	x	x	Other Village
Haveringland	x	x	x	x	x	x	x	x	x	x	x	x	Smaller Rural Community
Hemblington	x	x	x	✓	x	x	x	x	x	x	x	x	Smaller Rural Community
Hevingham	✓	✓	x	✓	x	✓	✓	x	✓	x	x	x	Service Village
Heydon	x	✓	x	x	x	✓	x	x	x	x	x	x	Smaller Rural Community
Honingham	x	✓	x	x	x	✓	x	x	✓	x	x	x	Other Village
Horsford	✓	✓	✓	✓	x	✓	✓	✓	✓	✓	✓	✓	Service Village
Horsham & Newton St. Faith	✓	✓	✓	✓	x	✓	x	✓	✓	x	✓	✓	Service Village
Lingwood (and Burlingham)	✓	✓	✓	✓	x	✓	x	x	✓	x	x	x	Service Village
Little Witchingham	x	x	x	x	x	x	x	x	x	x	x	x	Smaller Rural Community
Marsham	✓	✓	x	✓	x	✓	x	x	x	x	x	x	Other Village (with accessible Primary School)
Morton on the Hill	x	x	x	x	x	x	x	x	x	x	x	x	Smaller Rural Community
Oulton	x	✓	x	x	x	✓	x	x	x	x	x	x	Smaller Rural Community
Postwick with Witton	x	✓	x	x	x	x	x	x	✓	x	x	x	Smaller Rural Community
Reedham	✓	✓	✓	✓	x	✓	✓	x	✓	✓	x	✓	Service Village
Ringland	x	✓	x	x	x	✓	x	x	x	x	x	x	Smaller Rural Community

Salhouse	✓	✓	x	✓	x	✓	x	x	✓	✓	x	x	Service Village
Salle	x	✓	x	x	x	x	x	x	x	x	x	x	Smaller Rural Community
South Walsham	✓	✓	x	✓	x	✓	✓	✓	✓	x	x	x	Service Village
Spixworth	✓	✓	✓	✓	x	✓	✓	✓	✓	✓	x	✓	Service Village
Stratton Strawless	x	✓	x	✓	x	x	x	✓	x	✓	✓	x	Other Village
Strumpshaw	✓	✓	x	✓	x	✓	x	x	x	x	x	x	Other Village (with accessible Primary School)
Swannington	x	x	✓	x	x	x	x	x	✓	x	✓	x	Smaller Rural Community
Themelthorpe	x	x	x	x	x	x	x	x	x	x	x	x	Smaller Rural Community
Upton with Fishley	x	✓	x	✓	x	✓	x	x	✓	✓	x	x	Other Village
Weston Longville	x	✓	x	x	x	✓	x	x	✓	x	x	x	Other Village
Wood Dalling	x	✓	x	x	x	x	x	x	x	x	x	x	Smaller Rural Community
Woodbastwick	x	✓	✓	x	x	✓	x	x	x	x	x	x	Other Village

South Norfolk Settlements	Core Services				Secondary Services								Status in Settlement Hierarchy
	Primary School	Village Hall	Food Shop	Journey to Work by Public Transport	Post Office	Pub	Pre-School	Petrol Station	Outdoor Recreation	Community Groups	Employment Opportunities	Healthcare Facility	
Alburgh	✓	✓	x	x	x	x	✓	x	✓	✓	x	x	Other Village (with accessible Primary School)
Aldeby	x	x	x	x	x	x	x	✓	x	x	x	x	Smaller Rural Community
Ashwellthorpe	x	✓	x	x	x	✓	x	x	✓	✓	x	x	Other Village
Aslacton & Great Moulton	✓	✓	x	✓	x	✓	x	x	x	✓	✓	x	Service Village
Barford	✓	✓	x	✓	x	x	✓	✓	✓	✓	✓	x	Service Village
Barnham Broom	✓	✓	✓	x	✓	✓	✓	x	✓	✓	✓	x	Service Village
Bawburgh	✓	✓	x	x	x	✓	x	x	✓	✓	x	x	Other Village (with accessible Primary School)
Bergh Apton	x	✓	✓	✓	✓	x	x	x	✓	✓	✓	x	Other Village
Bixley	x	x	x	✓	x	x	x	x	x	x	x	x	Smaller Rural Community
Bramerton	x	✓	x	x	x	✓	✓	x	✓	✓	✓	x	Smaller Rural Community
Bressingham	✓	✓	✓	x	x	✓	x	x	✓	✓	✓	✓	Service Village
Brockdish	x	✓	x	✓	x	✓	x	x	x	x	x	x	Other Village
Brooke	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	x	Service Village
Broome	✓	✓	x	✓	x	✓	x	x	x	✓	x	x	Other Village (with accessible Primary School)
Bunwell	✓	✓	✓	x	✓	x	✓	✓	✓	✓	✓	x	Service Village
Burgh St Peter (including parts in Wheatacre & Aldeby)	x	✓	x	x	x	✓	x	x	x	x	✓	x	Other Village
Burston	✓	✓	x	✓	x	✓	✓	x	✓	✓	✓	x	Service Village
Caistor St Edmund	x	x	✓	✓	x	x	x	x	✓	x	✓	x	Smaller Rural Community
Carleton Rode	✓	✓	x	x	x	x	✓	x	✓	✓	x	x	Other Village (with accessible Primary School)
Carleton St Peter	x	x	x	x	x	x	x	x	x	x	x	x	Smaller Rural Community
Claxton	x	✓	x	x	x	x	x	x	x	✓	x	x	Smaller Rural Community

Denton	x	✓	x	x	x	x	x	x	✓	✓	x	x	Other Village
Deopham	x	x	x	✓	x	✓	x	x	✓	x	x	x	Smaller Rural Community
Dickleburgh	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	x	Service Village
Ditchingham	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	x	Service Village
Earsham	✓	✓	x	✓	x	✓	✓	x	x	✓	✓	x	Service Village
East Carleton	x	x	x	x	x	x	x	x	x	x	✓	✓	Smaller Rural Community
Flordon	x	✓	x	x	x	x	x	x	x	x	x	✓	Smaller Rural Community
Forncett (St. Peter & St. Mary)	✓	✓	x	✓	x	x	✓	x	x	✓	✓	x	Service Village
Framingham Pigot	x	x	x	✓	x	✓	x	x	x	x	✓	x	Smaller Rural Community
Geldeston	x	✓	✓	✓	x	✓	x	x	✓	✓	✓	x	Other Village
Gillingham	✓	✓	✓	✓	x	✓	✓	✓	✓	x	x	✓	Service Village
Gissing	x	✓	x	✓	x	✓	✓	x	x	✓	x	x	Other Village
Great Melton	x	x	x	✓	x	x	x	x	x	✓	x	x	Smaller Rural Community
Haddiscoe	x	✓	x	✓	x	✓	✓	x	✓	✓	x	x	Smaller Rural Community
Hales (including part in Heckingham Parish)	✓	✓	✓	✓	x	x	x	✓	✓	x	x	x	Service Village
Hedenham	x	✓	x	✓	x	x	x	x	x	✓	x	x	Other Village
Hellington	x	x	x	✓	x	x	x	x	x	x	x	x	Smaller Rural Community
Hempnall	✓	✓	✓	✓	✓	✓	x	✓	✓	✓	✓	x	Service Village
Heywood	x	x	x	x	x	x	x	x	x	x	x	x	Smaller Rural Community
Holverston	x	x	✓	x	x	x	x	x	x	x	x	x	Smaller Rural Community
Howe	x	x	x	✓	x	x	x	x	✓	x	x	x	Smaller Rural Community
Keswick	x	✓	x	✓	x	x	x	x	✓	✓	x	✓	Other Village
Ketteringham	x	✓	x	✓	x	x	✓	✓	x	✓	✓	x	Other Village
Kimberley and Carleton Forehoe	x	x	x	✓	x	x	x	x	x	x	x	x	Smaller Rural Community
Kirby Bedon	x	✓	x	✓	x	x	x	x	x	x	x	x	Smaller Rural Community
Kirby Cane (including part in Ellingham Parish)	✓	✓	✓	x	✓	✓	x	x	x	✓	x	x	Service Village
Kirstead	x	x	x	✓	x	x	x	x	x	x	✓	x	Smaller Rural Community

Langley Street	x	✓	x	x	x	x	x	x	✓	x	✓	x	Other Village
Little Melton	✓	✓	✓	✓	x	✓	✓	✓	✓	✓	✓	x	Service Village
Marlingford & Colton	x	✓	x	✓	x	✓	x	x	✓	✓	✓	x	Other Village
Morley	✓	✓	x	x	x	✓	✓	x	x	✓	✓	✓	Service Village
Morningthorpe & Fritton	x	x	x	x	x	x	✓	x	x	x	✓	✓	Smaller Rural Community
Mulbarton and Bracon Ash	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	x	Service Village
Mundham	x	x	x	x	x	x	x	x	x	x	x	✓	Smaller Rural Community
Needham	✓	✓	x	✓	x	✓	x	x	x	✓	✓	x	Service Village
Newton Flotman	✓	✓	x	✓	x	x	✓	✓	✓	✓	✓	x	Service Village
Pulham Market	✓	✓	✓	x	✓	✓	✓	x	✓	✓	✓	x	Service Village
Pulham St Mary	✓	✓	✓	x	✓	x	x	✓	✓	✓	x	x	Service Village
Raveningham	x	x	x	✓	x	✓	x	x	x	x	x	x	Smaller Rural Community
Rockland St Mary	✓	✓	✓	✓	✓	✓	x	x	✓	x	x	x	Service Village
Roydon	✓	✓	x	✓	x	✓	✓	✓	✓	✓	x	x	Service Village
Runhall	x	x	x	x	x	x	x	x	✓	x	✓	x	Smaller Rural Community
Saxlingham Nethergate	✓	✓	x	✓	x	x	✓	x	✓	✓	x	x	Service Village
Scole	✓	x	✓	✓	x	✓	✓	✓	✓	x	x	x	Service Village
Seething	✓	✓	✓	x	✓	x	✓	✓	✓	x	✓	✓	Service Village
Shelfanger	x	✓	✓	x	x	x	x	✓	✓	✓	x	✓	Smaller Rural Community
Hardwick	✓	✓	x	✓	x	x	x	x	x	x	x	✓	Other Village (with accessible Primary School)
Shotesham	x	✓	x	✓	x	✓	x	x	✓	✓	x	x	Other Village
Sisland	x	x	x	x	x	x	x	x	x	x	✓	x	Smaller Rural Community
Starston	x	✓	x	x	x	x	x	x	✓	✓	x	x	Other Village
Stockton	x	x	x	✓	x	x	x	x	x	x	x	✓	Smaller Rural Community
Stoke Holy Cross	✓	✓	x	✓	✓	✓	✓	x	✓	✓	x	x	Service Village
Surlingham	✓	✓	✓	✓	✓	✓	x	✓	✓	✓	✓	x	Service Village
Swainsthorpe	x	✓	x	✓	x	✓	x	✓	✓	x	✓	✓	Other Village
Swardeston	x	✓	✓	✓	x	x	x	✓	✓	✓	✓	x	Other Village
Tacolneston	✓	✓	x	x	x	✓	✓	x	✓	✓	x	✓	Service Village
Tasburgh	✓	✓	x	✓	x	✓	✓	✓	✓	✓	x	✓	Service Village
Tharston & Hapton (excluding part	✓	✓	x	x	x	x	x	✓	x	✓	x	x	Other Village (with accessible Primary School)

adjacent to Long Stratton)														
Thurlton and Norton Subcourse	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	Service Village
Thurton (including part in Ashby St Mary Parish)	✓	✓	✗	✓	✗	✓	✓	✗	✗	✓	✓	✓		Service Village
Thwaite	✗	✗	✗	✗	✗	✗	✗	✗	✗	✓	✗	✓		Smaller Rural Community
Tibenham	✗	✓	✗	✗	✗	✓	✗	✗	✓	✓	✗	✗		Other Village
Tivetshall St Mary & St Margaret	✓	✓	✗	✗	✓	✓	✗	✗	✗	✓	✓	✗		Service Village
Toft Monks	✓	✗	✗	✗	✗	✓	✗	✓	✗	✗	✗	✗		Smaller Rural Community
Topcroft Street	✗	✓	✗	✗	✗	✗	✗	✗	✓	✓	✗	✗		Other Village
Wacton	✗	✓	✗	✓	✗	✗	✗	✗	✓	✓	✗	✗		Other Village
Wheatacre	✗	✗	✗	✗	✗	✓	✗	✗	✗	✗	✓	✗		Smaller Rural Community
Wicklewood	✓	✓	✗	✓	✗	✓	✓	✓	✓	✓	✗	✗		Service Village
Winfarthing	✓	✓	✗	✗	✗	✓	✗	✗	✗	✓	✗	✗		Other Village (with accessible Primary School)
Woodton (including part in Bedingham parish)	✓	✓	✓	✓	✗	✓	✓	✓	✓	✓	✗	✓		Service Village
Wortwell	✗	✓	✓	✓	✗	✓	✗	✓	✓	✓	✓	✓	✗	Other Village
Wramplingham	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗	✗		Smaller Rural Community
Wreningham	✓	✓	✗	✓	✗	✓	✗	✗	✓	✓	✓	✗		Service Village
Spooner Row	✓	✓	✗	✓	✗	✓	✗	✗	✗	✗	✗	✗		Other Village (with accessible Primary School)
Yelverton (including part in Alington Parish)	✓	✓	✗	✓	✗	✓	✓	✓	✓	✓	✗	✗		Service Village

APPENDIX 4 – GLOSSARY

Accessible

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

- **Affordable housing**

Housing provided for sale, rent or shared equity at prices in perpetuity below the current market rate, which people in housing need are able to afford.

- **Allocated**

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

- **Area Action Plan (AAP)**

A development plan document within the adopted local plan that establishes a set of development proposals and policies for a specific area.

- **Biodiversity**

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

- **Brownfield land, brownfield site**

Land or site that has been subject to previous development.

- **Built environment**

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

- **Bus Rapid Transit (BRT)**

Bus-based public transport service providing more frequent and faster services than an ordinary bus route, achieved by making improvements to existing infrastructure, vehicles and scheduling.

- **Community Infrastructure Levy**

A Government initiative under which local authorities publish a schedule of standardised charges per new dwelling which are then paid by developers to help provide new infrastructure.

- **City centre**

The main commercial area of Norwich as set out on the city centre key diagram.

- **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 post offices, village halls, food shops, public houses, pre-school facilities, petrol stations, outdoor recreation, community groups, GP practices and bus services.

- **Comparison goods**

Household or personal items which are more expensive and are usually purchased after comparing alternative models/types/styles and price of the item (e.g. clothes, furniture, electrical appliances).

- **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.

- **Convenience goods**

Items bought for everyday needs, including food, drink, newspapers and tobacco and chemist's goods.

- **County Wildlife Site**

Wildlife habitat identified and designated as being of particular local interest or importance by Norfolk County Council and the Norfolk Wildlife Trust but which is not of sufficient national merit to be declared as a Site of Special Scientific Interest.

- **Criteria-based policies**

Policies which set out conditions to be met for that type of development, so that ad hoc proposals may be assessed, even if the site is not identified for that land use in the local plan.

- **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 may consist of a range of locally prepared development plan documents including the local plan, policies maps, site allocation plans, neighbourhood plans, core strategies, area action plans. The previous system referred to the local plan as the local development framework, or LDF.

- **Development Plan Document**

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

- **Development boundary**

See settlement boundary

- **District centre**

A group of shops, containing at least one supermarket or superstore and other services, providing for a catchment extending beyond the immediate locality.

- **Employment use**

Use primarily for industrial, warehousing, office or other business uses usually falling within classes B1, B2 and B8 of the use classes order.

- **Exception site**

A small site to be used specifically for affordable housing that would not normally be used for housing, because they are subject to policies of restraint. Exception sites should be used for affordable housing in perpetuity. (NPPF, paragraph 54).

- **Green infrastructure**

Green spaces and interconnecting green corridors in urban areas, the countryside in and around towns and rural settlements, and in the wider countryside. It includes natural green spaces colonised by plants and animals and dominated by natural processes as well as man-made managed green spaces such as areas used for outdoor sport and recreation including public and private open space, allotments, urban parks and designed historic landscapes as well as their many interconnections like 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. Does not include residential garden land in rural areas.

- **Habitats Regulations Assessment (HRA)**

This is a report which must be prepared to accompany a local plan. It identifies the impacts of the plan on, and any mitigation required for SAC, SPA and Ramsar sites.

- **Health Impact Assessment**

An assessment to judge whether development proposals may have an impact on health or health inequality in terms of its effects on health and social care services, or wider lifestyle related considerations or factors such as social inclusion, independence or air pollution, for example.

- **Index of Multiple Deprivation**

An index, at Lower Super Output Area level, made up from seven domains (income; employment; education, skills and training; health and disability; crime; housing and services; and living environment).

- **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. It includes physical services serving the particular development (e.g. gas, electricity and water supply; telephones, sewerage) and also includes networks of roads, public transport routes, footpaths etc as well as community facilities and green infrastructure.

- **Joint Core Strategy (JCS)**

Part of the adopted development plan in Greater Norwich - a spatial planning strategy that sets out long-term objectives for planning to 2026.

- **Knowledge economy**

The sector of the economy which is increasingly based on knowledge-intensive activities, creating a greater reliance on intellectual capital rather than physical outputs. It does not rely solely on a few advanced technology industries but is applicable to many traditional industries.

- **Life Sciences**

Any of several branches of science, such as biology, medicine, anthropology, or ecology, that deals with living organisms and their organisation, life processes, and relationships to each other and their environment.

- **Local centre**

A group of shops or services forming a centre of purely local significance. See also city centre, district centre and commercial area.

- **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.

- **Low-carbon**

To minimise carbon dioxide emissions from a human activity.

- **Northern Distributor Road (NDR)**

A dual-carriageway road under construction 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. The most recent Implementation Plan was adopted in 2013.

- **Norwich fringe**

Area next to the city of Norwich, but lying in other administrative districts which is predominantly developed, including open spaces encompassed within the developed area. For Broadland this includes the continuously built up parts of Hellesdon, Drayton, Taverham, Old Catton, Sprowston and Thorpe St Andrew and in South Norfolk it includes Colney, Costessey, Cringleford and Trowse.

- **Norwich Policy Area**

Part of the county which is centred on and strongly influenced by the presence of Norwich as a centre for employment, shopping and entertainment, generally comprising the fringe and first ring of large villages around the city of Norwich, but extending to Long Stratton and Wymondham.

- **Park and ride**

Provision of 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 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 agreements. See also Community Infrastructure Levy (CIL)

- **Previously developed land**

See brownfield land.

- **Protected sites or species**

Any site or species which, because of its rarity or threatened status is protected primarily by statutory legislation (The Wildlife and Countryside Act 1981 (as amended) and the Conservation (Natural Habitats etc) Regulations 1994) or international legislation.

- **Ramsar site**

A European designation that protects areas of wetland.

- **Regional Spatial Strategy (RSS)**

Formerly, a broad strategy setting out spatial planning policies for a region and helped to shape the adopted Joint Core Strategy. RSSs were revoked in 2010.

- **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.

- **Settlement Hierarchy**

A way of grading settlements based upon a number of criteria, such as population and services available.

- **Settlement boundary**

This is an area where development appropriate to the settlement in question will usually be permitted. Sometimes called village envelopes or development boundaries.

- **Site allocation plan or DPD**

A document used to identify sites to accommodate the range of land uses necessary to implement the objectives of a core strategy where this has been adopted already.

- **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, amended in 1985 and further substantially amended in 2000 (by the Countryside and Rights of Way Act 2000)

- **Spatial portrait**

This provides the context for the local plan. It describes the area in question, 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). They are defined to protect the 189 habitats and approximately 800 species listed in Annex I and II of the directive (as amended) which are considered to be 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 came into force in April 1979. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species.

- **Street furniture**

Collective term for permanent structures installed within the highway, including footways and pedestrian areas. Includes street lighting columns, signs, seats, litter bins, telephone kiosks, post boxes etc.

- **Supplementary Planning Document (SPD)**

Guidance published by 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 a particular issue, or may give more detailed guidance of the development of a specific site, covering a whole range of issues.

- **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**

The United Nations have defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At the heart of the National Planning Policy Framework (NPPF) is a presumption in favour of sustainable development. At paragraph 14 the NPPF states that this means local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The NPPF promotes environmental, economic and social sustainability.

- **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. Designed to minimise the impact of development on the natural water environment.

- **Tertiary education**

Tertiary education is the educational level following the completion of secondary education and includes further, as well as higher, education.

- **Transport assessment**

An assessment that may be required in connection with major development proposals that looks at how people are likely to access the development and its effects on travel patterns. It will also look at how any undesirable consequences can be mitigated. It should consider how access on foot, by cycle or public transport can be promoted and how the demand for car parking can be minimised.

- **Use class**

The Town and Country Planning (Use Classes) Order, 1987 groups land uses into different categories called use classes. Change of use within a use class and some changes between classes do not require planning permission.

- **Windfall**

Describes planning permission for housing development which is granted during the plan period but which is not identified in the plan for housing development.

