



NORWICH City Council

Committee name: Cabinet

Committee date: 18/01/2023

Report title: Local Development Scheme Update 2023

Portfolio: Councillor Stonard, Cabinet member for inclusive and sustainable growth

Report from: Head of planning and regulatory services

Wards: All Wards

OPEN PUBLIC ITEM

Purpose

To consider the draft revised Local Development Scheme. This is the work programme for producing key planning documents, which will form part of the local plan for Norwich. The scheme is attached at Appendix 1 and covers a two-year period to 2025.

Recommendation:

To agree the Local Development Scheme 2023 update and approve it for publication under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by section 111 of the Localism Act 2011).

Policy framework

The council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report meets the Norwich is a sustainable and healthy city, Norwich has the infrastructure and housing it needs to be a successful city and Norwich City council is in good shape to serve the city corporate priorities.

This report addresses the following strategic actions in the Corporate Plan:

- Provide means for people to lead healthy, connected, fulfilling lives, particularly those who are most vulnerable

- Maintain a clean and sustainable city with a good local environment that people value
- Ensure our services mitigate against any adverse effects of climate change and are efficient to reduce carbon emissions
- Build and maintain a range of affordable and social housing
- Continue sensitive regeneration of the city that retains its unique character and meets local needs
- Mobilise activity and investment that promotes a growing, diverse, innovative and resilient economy.

This report helps to meet the following objectives of the COVID-19 Recovery Plan:

- Housing, regeneration and development
- Climate change and the green economy

Report details

1. The Local Development Scheme (LDS) must be prepared as part of the statutory process of plan making. It is the work programme and project plan for the preparation of the various planning policy document making up the local plan for the city.
2. Preparation of an LDS is required by Section 15 of the Planning and Compulsory Purchase Act, as amended by section 111 of the Localism Act 2011. The Localism Act has amended procedures for LDS production: a local planning authority has only to make a formal resolution to adopt the scheme and publish it on their website in order for it to take effect. There is no requirement to consult on the LDS prior to publication, or to submit it to the government for formal endorsement.
3. The legislation gives local authorities considerable leeway in the form and content of the LDS. However, it requires as a minimum the local planning authority, when publishing the LDS, to make the up-to-date text of the scheme available, provide details of any amendments made to the scheme, and information on its compliance (or non-compliance) with the timetable for the preparation and revision of documents identified within it.
4. The LDS was last reviewed in December 2021 and was intended to cover the period to 2023. Since then, further information has become available surrounding the East Norwich masterplanning exercise, progress on the Greater Norwich Local Plan (GNLP), as well as updates on a neighbourhood planning process and new legislative requirements relating to biodiversity.
5. The revised LDS will run to early 2025 and will entirely supersede the version published in December 2021. It will be rolled forward periodically to ensure that it is as up-to-date and flexible as possible.

Updates to the Local Development Scheme

6. The following summarises the changes made to the previous version of the LDS from December 2021:
 - a. In May 2022, the Government published its Levelling Up and Regeneration Bill (LURB) which includes information on repealing the

duty to cooperate, replacing CIL and S106 obligations with a new Infrastructure Levy, introducing mandatory area-wide design codes, the introduction of national development management policies, removal of the five-year land supply requirement in areas with an adopted local plan, replacement of Environmental Impact Assessments with a new system and introduction of a street vote system for planning permissions (list is not exhaustive). Given the political instability of the past few months, plans set out within the LURB have been delayed and amended and at the time of writing it is still unclear which of the proposals will be implemented. Therefore, this version of the LDS assumes a continuation of the current system. Should any changes to the planning system be formalised in future, a further update of the LDS will be prepared as necessary.

- b. In November 2021, the Environment Act came into force and has a number of implications for the planning system, primarily the need to achieve 10% biodiversity net gain on development sites. This requirement must be implemented by November 2023 and has, in part, generated the need for several additional work streams (Green Infrastructure Strategy and Biodiversity Baseline Study) which are set out below.
- c. The Statement of Community Involvement was fully revised in 2016, but a minor temporary update was approved in 2020 to increase flexibility in planning consultations as a result of the COVID-19 pandemic. This version of the SCI is still in place but is due for review in the coming months.
- d. In 2018, a neighbourhood area was designated for the Northern City Centre Area and the Norwich Over the Wensum neighbourhood forum was subsequently designated by Cabinet in April 2022. The neighbourhood forum is now at the initial stages of preparing their neighbourhood plan. The City Council is required to provide assistance in the plan preparation process and is reviewing the forum's anticipated work programme so that council resource can be assigned accordingly.
- e. The timetable for the production of the GNLP has been amended in the LDS to reflect recent changes to anticipated timescales to adoption. In July 2021, the GNLP was formally submitted to the Planning Inspectorate for examination and the first round of examination hearings were held in March this year. Adoption of the GNLP was previously envisaged in Winter 2022, however a consultation for a call for sites for Gypsy and Traveller development is currently underway and hearings on this issue are currently planned for July 2023, with hearings relating to the housing trajectory and nutrient neutrality planned for March 2023. Given the delay in the examination timetable, the GNLP is now likely to be adopted in early 2024. Further detail of the examination timetable is outlined in Section 5 of the LDS.
- f. In 2019, the council undertook a review of the DM Policies Plan and Site Allocations Plan in accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2017, which concluded that the local plan policies are fit for purpose at the time but that a full review of the DM policies should take place following the

Regulation 19 consultation of the GNLP. However, as set out above in paragraph (a) there is still a significant degree of uncertainty surrounding what planning reforms might be implemented, as well as a delay to the adoption of the GNLP, both of which could impact on any future review of the DM Policies Plan. Therefore, the intention is to commence review of the DM policies in early 2024 when there is greater clarity on proposed planning reforms and the final content of the GNLP.

- g. Following the cessation of the Britvic/Colmans/Unilever operations at the Carrow Works site, the Council and key partners commissioned a masterplan for the East Norwich Strategic Regeneration Area (ENSRA) in early 2021, to guide its future regeneration. The Stage 1 masterplan for East Norwich was endorsed by Norwich City Council's Cabinet in November 2021 and the Stage 2 masterplan and associated documents, including a draft supplementary planning document (SPD), in June 2022. A further stage of work (stage 3), led and funded by Homes England, is currently underway which considers a range of delivery issues, potential delivery mechanisms and refinement of infrastructure costs and triggers. The stage 3 work will help inform the final SPD which will be subject to statutory consultation prior to adoption. Once formally adopted, either alongside or following adoption of the GNLP, the SPD will supplement policies in the GNLP and will be a joint document guiding planning decision making for Norwich City Council, South Norfolk Council, and the Broads Authority.
- h. Over the past few years Norwich has seen a significant reduction in the office floorspace, largely attributed to the ability to convert offices to residential accommodation under the prior approval process and without planning permission. In July 2021, Cabinet agreed to delegate authority to officers to make an Article 4 Direction to remove permitted development rights for the conversion of offices to residential within Norwich City Centre. A copy of the direction and notice was submitted to the Secretary of State (SoS) for consideration, however feedback from the Department for Levelling Up, Housing and Communities (DLUHC) indicated that the area covered by the Direction needs to be more focussed. Further evidence was commissioned, and the boundaries covered by the Direction have been amended. Informal discussion with officers from DLUHC indicates that this would be an acceptable amendment. Cabinet approved the revised Article 4 Direction boundary in December 2022. The next step is to submit a formal request to the SoS to modify the Article 4 Direction. Should the process proceed as envisaged, the Direction should come into force in 2023.
- i. The River Wensum Strategy was adopted by Norwich City Council and partners in 2018. The River Wensum Strategy Partnership group continue to meet and have progressed to the delivery phase of the project, producing a Delivery Plan in 2021 to focus project delivery for the next two-year period. A number of projects identified within the strategy have already been completed such as the installation of canoe portages, an eel pass at New Mills and Barn Road Gateway public realm and accessibility improvements.
- j. Through the Greater Norwich Development Partnership, Norwich City Council, Broadland and South Norfolk Council's are jointly working on

preparing a new Green Infrastructure Strategy for Greater Norwich. This work is currently at the data collection and analysis stage, with the final work expected Spring/Summer 2023.

- k. To support the implementation of biodiversity net gain as introduced by the Environment Act, Norwich City Council has commissioned a Biodiversity Baseline Study to understand the threats to and opportunities for biodiversity across the city. This study commenced in November 2022 and is currently at data collection stage, with the final work outputs expected in Summer 2023.
- l. The Norfolk authorities previously commissioned the Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy (GIRAMS) to identify compensatory measures to mitigate the recreation impacts of new development. This study identifies the need to provide green infrastructure as well as payment of a tariff towards mitigation measures set out within the strategy. A review and refining exercise of the mitigation package and monitoring strategy is currently being commissioned with anticipated completion in mid-late 2023.
- m. In March 2022, a written Ministerial Statement on Nutrient Levels in River Basin Catchments was issued with supporting documentation that identified that water bodies in the River Wensum and Broads Special Areas of Conservation (SACs) and in the Broadland Ramsar are in unfavourable condition due to nutrient pollution. As such the local planning authorities are unable to grant planning permission for development resulting in additional overnight accommodation unless they are certain it will have no negative effect in nutrient terms on the protected sites. The Norfolk Councils appointed consultants Royal Haskoning in May 2022 to produce a Nutrient Neutrality Mitigation Strategy for the River Wensum and Broads SACs. This will identify specific and deliverable mitigation at a strategic level and is expected to be adopted by local authorities by June 2023. A separate report to this Cabinet meeting seeks approval for the establishment of a Joint Venture company (JV) with Anglian Water and Norfolk authorities. The purpose of the JV is to enable delivery of additional overnight accommodation and unlock homes that are currently on hold by enabling developers to purchase environmental credits to cover the additional nutrient load calculated for their sites. The GNLP will consider policy changes to reflect the issues of nutrient neutrality, and further examination hearings covering this topic will be held in March 2023.

Conclusions

- 7. The principal challenges to meeting the aims and timescales set out in the revised LDS remain the uncertainty around changes to national policy, availability of resources (both staff and financial), timescales surrounding local plan production process including the GNLP and a Neighbourhood Plan, and the continued joint working with other authorities across Norfolk.
- 8. In addition, many other aspects of the planning policy team's workload are not included in the LDS (such as monitoring and implementation of local plan policies) which require a significant staff resource. New planning priorities may

also emerge during the LDS period, which may impact upon achievement of LDS timescales.

9. Information about the workstreams identified in this LDS and any new priorities will be reported to Sustainable Development Panel as required and will be included in any future revisions to the LDS as appropriate.

Consultation

10. LDS must be made publicly available and kept up to date. There is no requirement for consultation on their content. However, the LDS is prepared with input internally as well as through engagement with partners such as the GNLP and Norfolk Strategic Planning Forum teams on workstreams that involve joint working and neighbourhood groupings.
11. This report will be presented to a meeting of Sustainable Development Panel on 10th January 2023. A verbal update on the Panel's recommendation will be presented at Cabinet.
12. In addition, the relevant portfolio holder was made aware of the contents and updates to the LDS prior to this report being completed.

Implications

Financial and resources

13. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and budget.
14. The information contained within the updated LDS is the Planning Policy team's planned workload based on the information available at the current time and this takes into account both financial and resource implications as part of the planning exercise.
15. Any changes to workloads that have financial or resource implications over and above existing budget provision will be subject to review and further approvals within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and Budget.

Legal

16. As set out in paragraph 2 of this report, the Council has a duty to approve and publish the Local Development Scheme. The Scheme itself does not form part of the local plan and therefore is for Cabinet to approve. This report also establishes the legal requirements in respect of publication of the Scheme.

Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	This information report does not have any direct implications for the council's equality and diversity considerations.
Health, social and economic impact	This information report does not have any direct implications for the council's health, social and economic impacts considerations.
Crime and disorder	This information report does not have any direct implications for the council's crime and disorder considerations.
Children and adults safeguarding	This information report does not have any direct implications for the council's children and adults safeguarding considerations.
Environmental impact	This information report does not have any direct implications for the council's environmental impact considerations.

Risk management

Risk	Consequence	Controls Required
Government makes significant changes to the planning system	Many of the workstreams identified in the LDS may not be required any longer and risks undertaking abortive work; new workstreams may be required which will have an impact on timescales and resources	The LDS already highlights areas of work which may be at risk from Government changes to the planning system. The LDS can be revised at any time to take account of changing circumstance. Reporting and sign off via SD Panel and Cabinet will be required for any future revision of the LDS.
Timescales for planned workload are brought forward/slip	This may impact on the resources required to ensure the workstreams continue/are completed.	The LDS can be revised at any time to take account of changing circumstance. Reporting and sign off via SD Panel and Cabinet will be required for any future revision of the LDS.

Risk	Consequence	Controls Required
Unknown additional workstreams not currently planned for	This may impact on timescales and resources available for planned-for workstreams.	The LDS can be revised at any time to take account of changing circumstance. Reporting and sign off via SD Panel and Cabinet will be required for any future revision of the LDS.
Changes to available resources	This may impact on timescales for planned-for and unknown additional work streams.	The LDS can be revised at any time to take account of changing circumstance. Reporting and sign off via SD Panel and Cabinet will be required for any future revision of the LDS.

Other options considered

17. Preparation of an LDS is required by section 15 of the Planning and Compulsory Purchase Act, as amended by section 111 of the Localism Act 2011, therefore no other options have been considered

Reasons for the decision/recommendation

18. The recommendation is to agree the Local Development Scheme and recommend that Cabinet approves it for publication to ensure that the Council complies with the requirement of section 15 of the Planning and Compulsory Act 2004 (as amended by section 111 of the Localism Act 2011).

Background papers: None

Appendices:

- 1 Local Development Scheme January 2023

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NORWICH
City Council

Local Development Scheme for Norwich

January 2023

1. Introduction

- 1.1 A Local development scheme (LDS) must be prepared under Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). It must identify the documents that will be prepared to set out the strategy for the development and use of land in the local planning authority's area – collectively called development plan documents. An LDS is a project plan which identifies the documents which, when prepared, will make up the Local Plan for the area. It must be made publicly available and kept up-to-date. It allows the public and stakeholders to find out about planning policies in their area, the status of any emerging policies in the development plan, and the details of and timescales for production of all relevant documents.
- 1.2 This LDS applies only to the area of the city for which Norwich City Council is the local planning authority. It should be noted that part of the administrative area of Norwich (namely the tidal river Wensum downstream of New Mills and an area of land at Cremorne Lane) falls within the planning jurisdiction of the Broads Authority, which is subject to a separate local plan and LDS.
- 1.3 In addition to providing information about the main development plan documents in preparation, this LDS also provides detail about the preparation of Supplementary Planning Documents (SPDs) and other informal planning guidance and adopted local development documents, to provide a full account of the planning policies that will operate in Norwich. This document also refers to committed and potential workstreams contributing to documents, which may form part of the LDS.
- 1.4 The LDS was last updated in December 2021. Since the publication of that document, further information has become available surrounding the East Norwich masterplanning exercise, progress on the Greater Norwich Local Plan, as well as neighbourhood planning and biodiversity related workstreams.
- 1.5 In May 2022, the Government published its Levelling Up and Regeneration Bill (LURB) which includes information on repealing the duty to cooperate, replacing the Community Infrastructure Levy and S106 obligations with a new Infrastructure Levy, introducing mandatory area-wide design codes, the introduction of National Development Management Policies, removal of the five year land supply requirement in areas with an adopted plan, replacement of Environmental Impact Assessments with a new system and introduction of a street vote system for planning permissions (list is not exhaustive).
- 1.6 Given the political instability of the past few months, plans set out within the LURB have been delayed and amended, however it is still unclear at this time which of the initial proposals will end up being implemented. Therefore, this revision of the LDS, and all the workstreams contained within it, assume a continuation of the current system. Should any changes to the planning system be formalised in future, a further update of the LDS will be prepared as necessary.

Summary of progress since the last LDS

- 1.7 Since publication of the last LDS, progress has been made on the preparation of the **Greater Norwich Local Plan (GNLP)**. Further details are set out in the main body of this document.
- 1.8 The **Statement of Community Involvement (SCI)** was fully revised and published in November 2016, and replaces the version published in July 2013. The SCI is the council's code of practice for involving the community in planning issues, including decisions about plan making and on planning applications. A minor temporary update was made to the SCI in 2020 to increase flexibility in planning consultations as a result of the COVID-19 pandemic. The latest version of the SCI remains in place and is due for review in the coming months.
- 1.9 The **Brownfield Register (Part 1)** was last published in October 2022. This includes sites that have been assessed as being appropriate for residential development, such as sites with planning permission and allocations in local plans. The register will be updated at least once a year in accordance with Regulation 17 of the Town and Country Planning (Brownfield Land Register) Regulations 2017.
- 1.10 A **Self-build Register** for Norwich was established in 2016 to enable individuals and organisations to register their desire for land for self-build or custom-built housing. The register will enable the council to monitor the demand for self and custom build plots. A local connection test and annual fee were introduced in 2017.
- 1.11 The **River Wensum Strategy** was adopted by Norwich City Council (in June 2018) and by the other partner authorities during summer 2018. The strategy development and ongoing delivery is led by Norwich City Council working in partnership with the Broads Authority, Norfolk County Council, the Environment Agency and the Norwich Society. This is a non-statutory strategy aimed at facilitating change and regeneration in the river corridor by helping to change perceptions of the city as a visitor destination and acting as an economic driver to attract investment. It promotes greater use of the river Wensum, in particular promoting improved access/signage to the river, increasing activity on the river, enhancing its function as a key piece of green infrastructure and its contribution to biodiversity, and increasing its attractiveness to tourists and visitors. The River Wensum Strategy Partnership group continue to meet and have progressed to the delivery phase of the project, producing a Delivery Plan in 2021 to focus project delivery for the next two-year period. A number of projects identified in the strategy have already been completed, such as the installation of canoe portages, an eel pass at New Mills, and Barn Road Gateway public realm and accessibility improvements.
- 1.12 In June 2018, the city council's Cabinet formally designated the area that was previously the subject of the Northern City Centre Area Action Plan as a neighbourhood area. This followed applications for designation of a wider area (the Cathedral, Magdalen and St Augustine's Street area - CMSA) as a neighbourhood area and for designation of a forum for that area. Following a public consultation in early 2018, both applications were

refused by Norwich City Council and the Broads Authority (the latter being involved as part of the River Wensum falls within the proposed area) in June 2018. The Localism Act 2011, S61G(5) states that, where a local authority refuses an application for designation of a neighbourhood area because they consider the specified area to be inappropriate as such, they must exercise their powers of designation to secure that some or all of the specified area forms part of one or more areas designated as neighbourhood area.

- 1.13 The designated **Northern City Centre Neighbourhood Area** is already well established as an appropriate area for planning purposes, and development of a neighbourhood plan could help to positively build on the area's significant regeneration potential. Since the last version of the LDS was published, the Norwich Over the Wensum Neighbourhood Forum was designated by Cabinet in April 2022. The Forum have begun initial preparation work for a **Neighbourhood Plan**.
- 1.14 In November 2019, the **Purpose Built Student Accommodation in Norwich: Evidence and Best Practice Advice Note** was adopted by cabinet. Following a significant rise in the number of applications for Purpose Built Student Accommodation (PBSA) over a number of years, the PBSA advice note was prepared to provide guidance for applicants and decision-makers in the absence of a specific policy in the Local Plan. The council has produced the advice note with the aim of ensuring delivery of high quality PBSA in Norwich. This includes an assessment of the need for purpose-built accommodation and guidance on a range of issues including the location, scale, external and internal design and management of PBSA, and how to encourage an accommodation mix for a wide range of students. The Council is continuing to work with local higher education institutions and their student's unions through PBSA working groups, to monitor and share information to support the provision of good quality and appropriate student accommodation. An update to the PBSA advice note to reflect current need and to support the emerging policy in the GNLP is anticipated in 2023/24.
- 1.15 UEA has updated its **Estates Strategy** to focus on the approach to new development and refurbishment on campus. The university also has the 2019 Development Framework Strategy which is part of the evidence base for the Greater Norwich Local Plan.

2. Scope of the Norwich Local Development Scheme

- 2.1 The Local Development Scheme covers the following types of documents:

Development plan documents (DPDs)

- 2.2 Development plan documents or DPDs are the formal policy documents which make up the statutory development plan (the *local plan*) for Norwich. Once adopted, these have full legal weight in decision-making. The council's decisions to approve or refuse any development which needs planning permission must be made in accordance with the local plan unless material considerations indicate otherwise. The local plan may be either a single document or a number of separate related documents.

- 2.3 The adopted local plan for Norwich comprises the **Joint Core Strategy for Broadland, Norwich and South Norfolk** (the JCS) adopted in March 2011, amendments adopted January 2014; the **Norwich Site Allocations and Site Specific Policies Local Plan** (the Site Allocations Plan), adopted December 2014 and the **Norwich Development Management Policies Local Plan** (the DM Policies Plan), adopted December 2014. The **Northern City Centre Area Action Plan** (NCCAAP) as stated earlier no longer forms part of the local plan, although policy 11 of the JCS remains adopted and requires regeneration of the northern city centre in accordance with NCCAAP principles. Accordingly, a commitment to regenerate the northern city centre will remain a material consideration in determining planning applications in that area.
- 2.4 The JCS and Site Allocations plan will be replaced by the emerging Greater Norwich Local Plan (GNLP), which will run until 2038 and is scheduled to be adopted in early 2024.
- 2.5 Each document must be prepared in accordance with a nationally prescribed procedure set out in the national Local Planning Regulations for England, which were last reviewed in 2012 and in accordance with the National Planning Policy Framework. At key stages of plan-making there is an opportunity for the public to comment on emerging planning policies and proposals in the documents. At the end of the process, development plan documents must be submitted to the Secretary of State and independently examined by a government appointed inspector to assess their soundness and legal compliance before they can be *adopted* by the city council and come into force.
- 2.6 Certain other documents must be published alongside each DPD, including:
- the **sustainability appraisal** (SA) report of the plan at each stage (a **sustainability appraisal scoping report** is prepared and consulted on at the start of the process to set out what sustainability issues and objectives the SA should cover and what evidence it will use);
 - A **habitats regulations assessment** (HRA) if policies and proposals in the plan are likely to have impacts on important natural and wildlife habitats protected by national and international legislation. This is also known as the “Appropriate Assessment”.
 - a **policies map**, setting out the DPDs policies and proposals on a map base (if relevant);
 - a **statement of consultation** summarising public representations made to the plan and how they have been addressed (called the “Regulation 22(c) statement”);
 - copies of any representations made;
 - any other supporting documents considered by the council to be relevant in preparing the plan;
 - an **adoption statement and environmental statement** (when the plan is adopted).

Supplementary planning documents (SPDs)

- 2.7 Supplementary planning documents (SPDs) help to support and explain in more detail how the city council will implement particular policies and proposals in the Local Plan.

SPDs can also take the form of master plans, detailed design briefs or development briefs for sites identified for future development (“allocated”) in the plan, as well as for other emerging sites.

- 2.8 SPDs can be reviewed frequently and relatively straightforwardly to respond to change, whereas a review of the policies in the plan is a longer and more complex process.
- 2.9 National **Planning Practice Guidance** (PPG) states that SPDs should build upon and provide more detailed advice or guidance on the policies in the Local Plan and should not be used to add unnecessarily to the financial burdens on development. SPDs should not introduce new or include excessively detailed policy guidance, but ought to be used only where it can clarify and amplify existing policy and set out how it will help to bring forward sustainable development.
- 2.10 There are currently five adopted SPDs in place, which support the policies in the JCS and DM Policies Plan. Other planning guidance may also be produced during the lifetime of this LDS (see below).

Other local plan documents

- 2.11 In addition to the progress report provided by this LDS, a number of other documents must be prepared alongside the local plan, but do not form part of it.
- 2.12 A **Statement of Community Involvement** (SCI) must show how the council intends to involve the community in plan preparation and planning decision-making. It is not a local development document but legally it must set out how documents specified in the LDS will be consulted on.
- 2.13 To ensure that plans and policies are effective, an **Annual Monitoring Report** (AMR) must also be prepared to record progress on implementing the local plan and how new development and change taking place in the previous year has contributed to achieving its targets. From 2011, the AMR for Norwich has been incorporated within a combined monitoring report for the JCS prepared jointly by Norfolk County Council and the three district authorities covering Greater Norwich. The most recent JCS AMR, for the monitoring period April 2020 to March 2021, was published in November 2022¹.

Associated documents and initiatives

- 2.14 Although not required to be published as part of the LDS programme, the following additional documents and initiatives are listed in this LDS for information, as they will inform the preparation of future statutory development plan documents and/or provide a wider context for their implementation.

- a) **Non-statutory strategic guidance** including the **Norfolk Strategic Planning Framework** (NSPF);

¹ [Annual Monitoring Report » Greater Norwich Growth Board](#)

- b) Other **potential and anticipated workstreams** arising from ongoing national and local policy changes. The scope and extent of the work that may be undertaken depends on resources available to the council and (in some cases) further clarification from central government about how proposed new planning measures would operate in practice. For that reason, no detailed timescales can be specified for future informal local guidance and other work items in this category.

3. The existing local plan

- 3.1 A number of planning documents are already in place to guide the council's decisions on planning applications. Together these form the existing adopted local plan for Norwich, which has been through a formal process of consultation and independent examination before adoption. These documents include the **JCS**, the **DM Policies Plan** and the **Site Allocations Plan**.
- 3.2 As these documents are already in use, they are not part of the formal LDS schedule set out in the Annex, which deals in the main with the new and emerging documents that will be prepared to replace or supplement them. However, they are referred to below in order to provide a complete picture of the planning policy documents that apply in Norwich.
- 3.3 The documents making up the local plan must conform to national planning policy in the **National Planning Policy Framework (NPPF)**, supported by national **Planning Practice Guidance (PPG)**. In preparing its local plan, the council must show that it has met the statutory **Duty to Cooperate** with adjoining authorities and other relevant bodies. The Duty to Cooperate places a legal duty on local planning authorities and county councils in England to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.
- 3.4 The local plan documents fit into a hierarchy with broad strategic policies at the top and more detailed policies interpreting the strategic approach at a district and small area level. This is illustrated in Figure 1 on page 9.
- 3.5 For the Norwich area, the adopted **JCS** is the primary document at the top of the hierarchy with which other development plan documents prepared by individual districts should conform. The JCS was adopted in March 2011, with amendments adopted in January 2014. It is a strategic planning document prepared jointly by the three constituent districts in Greater Norwich and Norfolk County Council, and provides the long-term vision, objectives and spatial strategy for development of Norwich and its surrounding area for the period to 2026. The JCS is therefore at the heart of the present local plan for Norwich until it is superseded by the Greater Norwich Local Plan once adopted (see section 4 below).
- 3.6 The **Site Allocation Plan** identifies and sets out policies for sites in Norwich city where development is proposed or expected to occur between now and 2026. It responds to the requirement of the JCS to identify additional sites for 3000 new homes in the city by 2026 over and above existing housing commitments. It also identifies opportunities to accommodate the overall levels of growth in jobs and services anticipated over that period and to ensure that these can be delivered and located sustainably, with a particular focus on expanding office employment and retail and leisure uses in the city centre. It will also help to deliver the community facilities and green infrastructure and elements of the sustainable transport network required to support new development as it occurs, in accordance with the JCS. The Site Allocations Plan was adopted in December 2014.

- 3.7 The **DM Policies Plan** sets out a range of more detailed policies applying throughout Norwich to be used in the council's assessment of development proposals and to guide future council decisions on applications for planning permission up to 2026. Its 33 policies cover a range of topics, building on the national policy principles for sustainable development set out in the NPPF and the strategic policies and objectives of the JCS. In certain cases, the policies also set out local criteria and standards for different kinds of development. The DM Policies Plan was also adopted in December 2014.
- 3.8 The Localism Act 2011 allows for community led **neighbourhood plans** to be brought forward to complement the adopted local plan, and this is reflected in Figure 1. As stated above (paragraph 1.10), a neighbourhood area and neighbourhood forum have been designated for the northern city centre area. However, no neighbourhood plans are yet adopted within the city boundary although a number of neighbourhood plans are now formally in place ("made") for the adjoining suburban parishes of Cringleford in South Norfolk, and Sprowston, Hellesdon and Old Catton in Broadland. The city council remains open to working in cooperation with community-led groups to produce neighbourhood plans where these help to promote beneficial development, regeneration or neighbourhood enhancement in accordance with the presumption in favour of sustainable development and the general principles set out in the NPPF.

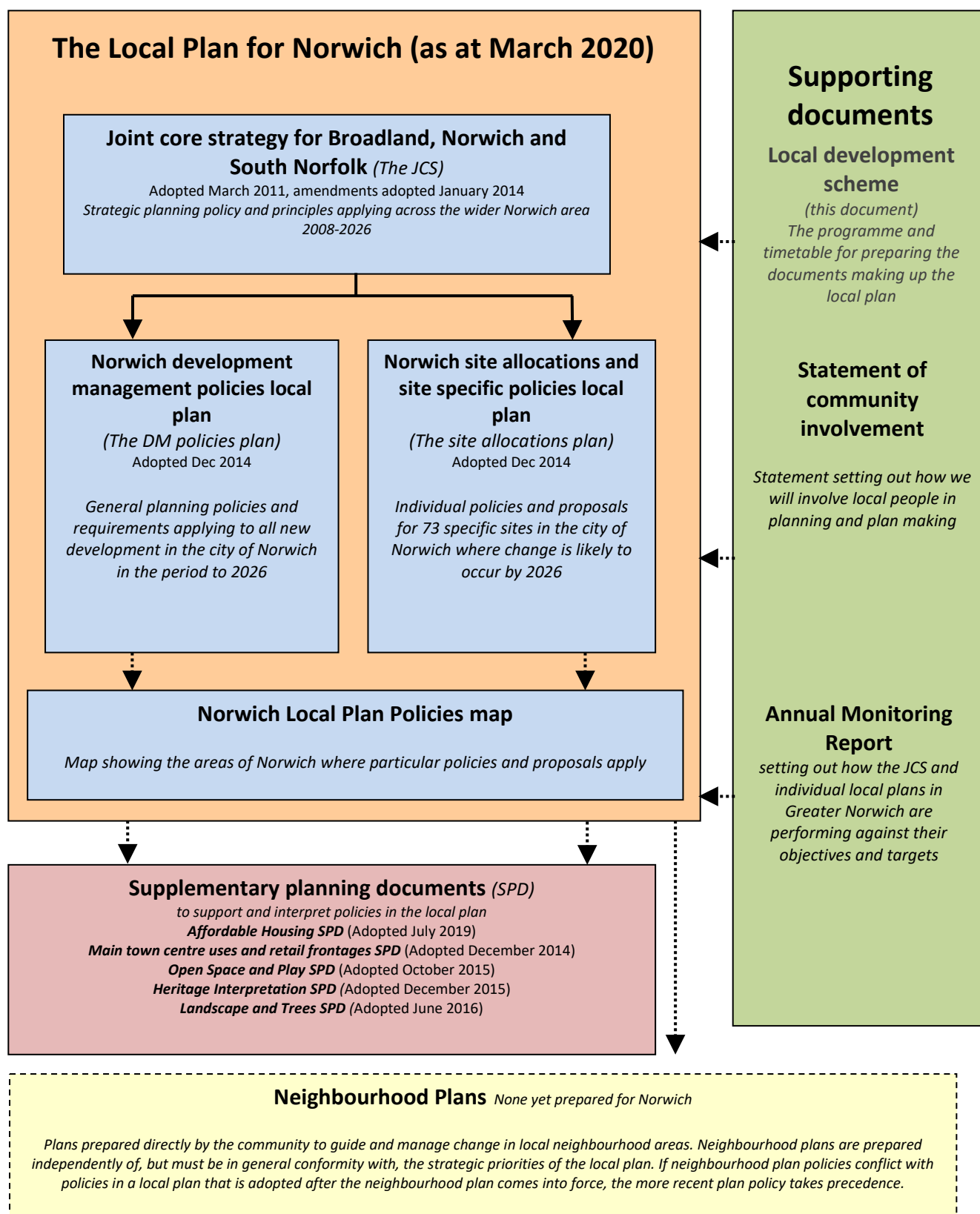


Figure 1: Hierarchy of the local policy context in Norwich

4. Looking forward – the emerging local plan and the 2023-25 LDS programme

- 4.1 The LDS was last reviewed in full in December 2021. This review is required to make updates to local plan preparation timescales and to provide updates on the progress of workstreams since the last revision. This revision of the LDS outlines the programme of documents and associated workstreams that will contribute to the replacement and review of the local plan. These will include the statutory and non-statutory planning documents detailed below.
- 4.2 Further detailed information on the GNLP is included in the Key Document Profiles in section 5. The work programme set out for this document may be subject to review dependent on the extent of evidence and resources likely to be required and timescales proposed by the Planning Inspectorate.

New Development Plan Documents

- 4.3 The proposed **Greater Norwich Local Plan**² (GNLP) will be a new statutory local plan for Broadland, Norwich and South Norfolk to update the present JCS. This will similarly set out a statement of strategic planning policy for the wider Norwich area but, unlike the JCS, will also include policies and proposals for individual sites. As such, the GNLP will also replace separate site allocations plans for individual districts – in the case of Norwich, the Site Allocations plan. However, the village clusters site allocations policies for the South Norfolk District will be included in a separate South Norfolk Village Clusters local plan which is being prepared alongside the GNLP. Only the overall number of dwellings proposed within these settlements is included within the GNLP itself.
- 4.4 The timetable for the production of the GNLP shown in this LDS has been adjusted to reflect changes in the production timetable and to account for progress over the last year. In July 2020 the Greater Norwich authorities agreed to extend the timescales for GNLP preparation to allow more time to make updates and amendments following the Regulation 18 consultation, to take on board updated evidence, to allow for an additional Regulation 18(d) consultation and to take account of the impacts of COVID-19. In August 2020, the Government published the Planning White Paper and Changes to the Current Planning System documents, which included a revision to the standard methodology for calculating housing need. Following consideration of options by the GNLP Board, the decision was taken to accelerate plan production making use of the transitional arrangements provided by the Government, based on the draft GNLP already consulted upon. In December 2020, the Government announced that the existing standard methodology would be retained meaning that the GNLP would no longer need to proceed through transitional arrangements. However, the Greater Norwich authorities agreed to proceed to the accelerated timescales in order to avoid any further delay in the plan's production and to ensure that plan-making momentum was maintained. In July 2021, the GNLP was formally submitted to the Planning Inspectorate for examination and the first round of examination hearings were held in March this year. Further hearings covering

² <https://gnlp.oc2.uk/>

topics such as the housing trajectory and nutrient neutrality are planned to be held in Spring 2023 with further sessions relating to Gypsy and Traveller sites in July 2023. Given the delay in the examination timetable, the GNLP is now likely to be adopted early 2024.

- 4.5 In accordance with paragraph 33 of the NPPF and S10A of the Town and Country Planning (Local Planning) (England) Regulations 2017, the council undertook a review of the DM Policies Plan and the Site Allocations Plan³, to review whether the plans are up to date and respond to changing local needs and circumstances. The review was carried out in October-November 2019 and endorsed by cabinet on 13 November 2019. It concluded that, in general, the local plan policies are fit for purpose at the current time, however it recommends that a full review of the DM Policies Plan should commence following the Regulation 19 consultation of the GNLP. The Regulation 19 consultation of the GNLP took place in early 2021 and therefore the review of the DM policies plan could, in theory, commence.
- 4.6 However, as set out in paragraphs 1.5-1.6, there is still a significant degree of uncertainty surrounding what planning reforms may be implemented by the government which could impact upon any future review of the DM Policies Local Plan. The intention is to consider commencement of a review of the DM Policies Local Plan in early 2024 when there is greater clarity on proposed planning reforms and on the final content of the GNLP. Once this is clarified, the LDS will be updated to include the programme of work.

Review of the non-statutory Norfolk Strategic Planning Framework

- 4.7 The **Norfolk Strategic Planning Framework**⁴ (NSPF) is a non-statutory strategic policy statement setting out broad strategic targets and priorities for the next round of statutory local plans for individual local planning authorities in Norfolk, facilitating joint working across district boundaries and helping to fulfil the statutory Duty to Co-operate. Current workstreams being facilitated through this joint working group include work to resolve cross-boundary issues of nutrient neutrality, and implementation of the Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy. The NSPF was revised and endorsed by Norwich City Council in April 2021.
- 4.8 As part of the LURB, it is proposed that the Duty to Cooperate requiring authorities to work together in an ongoing and meaningful way is abolished and replaced with a more flexible alignment test, which is still to be defined/described. The position on joint working will need to be kept under review when there is further clarity on proposals in the LURB.

³ https://www.norwich.gov.uk/info/20199/adopted_local_plan/2494/regulation_10a_review_of_the_local_plan

⁴ https://www.norwich.gov.uk/info/20022/planning_policy/1194/emerging_local_plan_and_evidence_documents/2

New Supplementary Planning Documents and planning guidance

- 4.8 Following the cessation of the Britvic/Colmans/Unilever operations at the Carrow Works site, the Council and key partners commissioned a **masterplan for the East Norwich Strategic Regeneration Area (ENSRA)** in early 2021, to guide its future regeneration. The ENSRA comprises approximately 50ha of brownfield land including Carrow works, the adjacent Carrow House, the Deal Ground/May Gurney site, and Utilities Site. Its regeneration is of strategic importance to the future growth and success of the city and wider area. It represents the largest regeneration scheme in Greater Norwich and has the potential to deliver a highly sustainable mixed use new community comprising up to 4,000 homes (as proposed in the Regulation 19 Greater Norwich Local Plan) alongside considerable employment and community spaces, linking the city centre with the Broads National Park at Whitlingham. To unlock the potential of this area there will need to be considerable investment in physical, social and community infrastructure to support redevelopment.

The master-planning exercise was completed by consultants Avison Young and partners and overseen by a public private partnership led by Norwich City Council and including Homes England. The Stage 1 masterplan for East Norwich was endorsed by Norwich City Council's Cabinet in November 2021 and the Stage 2 masterplan and associated documents, including a draft supplementary planning document, in June 2022. The stage 2 masterplan and draft SPD envisage around 3,600 new homes and at least 4,000 new jobs for East Norwich as a whole.

A further stage of work (Stage 3), led and funded by Homes England, is currently underway which considers a range of delivery issues including potential delivery mechanisms, and refinement of infrastructure costs and triggers. The Stage 3 work will help inform the content of the final SPD which will be subject to statutory consultation prior to adoption (see section 5 for timescales) in order to reflect the revised programme for adoption of the GNLP.

The SPD once formally adopted will supplement policies in the GNLP, currently undergoing public examination, and provide a framework for delivery of significant regeneration of the East Norwich area. The SPD will be a joint document, guiding planning decision making for Norwich City Council, South Norfolk Council and the Broads Authority.

Other committed and potential workstreams

- 4.9 The following paragraphs refer to committed and potential workstreams, which are or may be part of the Council's work programme, although in many cases the status and timescales for production of these have yet to be confirmed. None are formal development plan documents or supplementary planning documents but are included in the LDS for completeness. Subsequent revisions to the LDS would identify the need for any formal DPDs or SPDs emerging from this work.

Committed

4.10 Additional workstreams which are **committed** and form part of the planning service's work programme during this LDS period are as follows:

- Maintenance of the **Brownfield Land Register updates**. The Town and Country Planning (Brownfield Land Register) Regulations 2017 require local planning authorities to maintain a statutory Brownfield Land Register. The regulations state that the Part 1 Registers must be updated at least annually so this will form an ongoing commitment. Part 2 of the register is intended to include sites listed in Part 1, which are considered suitable for the granting of planning permission in principle for residential development. There is no intention at this stage to produce a Part 2 Register.
- The **Self-Build Register** (set up in April 2016) will continue to be maintained in accordance with the Self-build and Custom Housebuilding Act 2015⁵ (as amended by the Housing and Planning Act 2016).
- Through the Greater Norwich Development Partnership, Norwich City, Broadland and South Norfolk Council's are jointly working on preparing a new **Green Infrastructure Strategy for Greater Norwich**. This work is currently at the data collection and analysis stage, with the final work expected in Spring/Summer 2023.
- To support the implementation of biodiversity net gain as introduced by the Environment Act, Norwich City Council has commissioned a **Biodiversity Baseline Study**. This study commenced in November 2022 and is currently at data collection stage, with the final work expected in Summer 2023.
- In exercising their duties as a local authority, the council has a legal duty to comply with the Conservation of Habitats and Species Regulations 2017. This requires the authority to assess the impacts of all plans and programmes that may affect the protected features of any site protected under those regulations. Recreational pressures from growth and the resultant impact on designated habitat sites is a cross boundary issue affecting all local plans in Norfolk. Compensatory measures to mitigate the recreation impacts have been identified within the **Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy (GIRAMS)**, which was commissioned on behalf of all the Norfolk authorities. This identifies that new developments are required to provide appropriate green infrastructure as well as payment of a tariff towards mitigation measures set out in the strategy. A review and refining exercise of the mitigation package and monitoring strategy set out in the original strategy is currently being commissioned with anticipated completion in mid-late 2023.
- On March 16th 2022, a Written Ministerial Statement (WMS) on Nutrient Levels in River Basin Catchments was issued. It signalled changes in the approach to the assessment of development proposals in catchments where water bodies that are

⁵ <http://www.legislation.gov.uk/ukpga/2015/17/contents/enacted/data.htm>

protected sites under the Habitat Regulations are in unfavourable condition due to nutrient pollution. The WMS stated that “Local Planning Authorities can only approve a project if they are certain it will have no negative effect on the protected site”. At the same time, the Chief Planner sent a letter to the affected local planning authorities (LPAs) on nutrient pollution issues, support and funding. NE also published advice and support on how to evidence that nutrient neutrality will be achieved in relevant new development in order to mitigate impacts on the protected habitats. Supporting documentation identified that relevant development in large parts of Greater Norwich impacts on protected water bodies in the River Wensum and the Broads Special Areas of Conservation (SACs) and in the Broadland Ramsar. As with all affected councils, this means that the city council is currently unable to grant planning permission where a development will result in additional overnight stays. The Norfolk councils appointed consultants Royal Haskoning in May 2022 to produce a **Nutrient Neutrality Mitigation Strategy** for the River Wensum Special Area of Conservation (SAC) and the Broads SAC. The strategy will identify specific and deliverable mitigation at a strategic level. It is currently expected that the strategy will be adopted by Local Authorities by June 2023. Work is underway to establish a Joint venture (JV) company with Anglian Water and Norfolk authorities (subject to Cabinet approval). The purpose of the JV is to enable delivery of additional overnight accommodation and unlock homes that are currently on hold by enabling developers to purchase environmental credits to cover the additional nutrient load calculated for their sites. The GNLP will consider policy changes to reflect the issue of nutrient neutrality; the GNLP examination hearing on nutrient neutrality session is programmed for March 2023.

- Over the past few years, Norwich has seen a significant reduction in office floorspace. This is largely attributed to the ability to convert offices to residential accommodation under the prior approval process, and without planning permission. In July 2021, Cabinet agreed to delegate authority to officers to make an Article 4 Direction to remove permitted development rights for the conversion of offices to residential within Norwich City Centre. Following this, a copy of the direction and notice was submitted to the Secretary of State (SoS) for consideration, however feedback from the Department of Levelling Up, Housing and Communities indicated that the area to be covered by the Article 4 Direction needs to be more focused. Subsequently, consultants were commissioned to update the evidence for the Article 4 Direction, and the boundaries to be covered by the Direction have been amended. Informal discussion with officers from DLUHC have indicated that this would be an acceptable amendment. Cabinet approved the revised Article 4 Direction boundary in December 2022. The next step is to submit a formal request to the SoS to modify the Article 4 Direction. Should the process proceed as envisaged, the Direction should come into force in 2023.
- In 2018, a neighbourhood area was designated for the Northern City Centre Area and the Norwich over the Wensum neighbourhood forum was subsequently designated by Cabinet in April 2022. The neighbourhood forum is now at the initial stages of preparing their neighbourhood plan. The City Council is required to provide assistance

in the plan preparation process and is reviewing the forum's anticipated work programme so that council resource can be assigned accordingly.

Potential Additional Work

4.11 Additional workstreams which may be progressed, but which **are not firm commitments** in this LDS period, are:

- **The Environment Act**⁶ came into force in November 2021. The Act makes provision about targets, plans and policies for improving the natural environment. The Act has a number of implications for the planning system, in particular the need for development sites to achieve 10% biodiversity net gain compared to pre-development levels; as well the production of Local Nature Recovery Strategies to contribute to a national nature recovery network. The LNRS is a workstream led by the county council. The biodiversity net gain requirement must be implemented by November 2023, and has therefore generated the need for several additional work streams (see below).
- In 2019, the Government published the first two parts of the **National Design Guide**⁷. This document sets out the characteristics of well-designed places and demonstrates what good design means in practice. It forms one part of Government guidance aiming to achieve enduring and successful places and forms a material consideration in the determination of planning applications. The third part of the design guide includes the provision of a National Model Design Code and sets a baseline standard of quality and practice across England which local planning authorities will be expected to take into account when developing local design codes and guides, and when determining planning applications. Since then, the LURB proposes that all local planning authorities will be required to produce a design code for its area. These codes will have full weight in making decisions on development either as part of the local plan or as supplementary planning documents. Further clarity is required on what requirements will be put in place as result of the LURB and the timescales for doing so. Additional resource will be required as well as an assessment of internal expertise.

⁶ <https://services.parliament.uk/bills/2019-20/environment.html>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf

5. Key document profiles

Document Title		Greater Norwich Local Plan (GNLP)
Role and content		To provide the strategic vision, objectives and strategy for future development of the greater Norwich area, to accommodate objectively assessed needs for growth and to identify specific sites for development in the period to 2038. The GNLP provides the strategic context for the preparation of lower level policy documents prepared by the three constituent district planning authorities.
Status		Statutory Development Plan Document (DPD)
Conformity		The document must conform with the National Planning Policy Framework (the NPPF). It should also accord with standing advice in national Planning Practice Guidance (PPG).
Geographical coverage		The three districts of Broadland, Norwich and South Norfolk, excluding the parts of those districts falling within the Broads Authority area. This excludes site allocations in village clusters in South Norfolk.
Joint working arrangements (if any)		The plan is being prepared by a joint team comprising officers from Norwich, Broadland and South Norfolk district councils with the support of Norfolk County Council. Each council will make independent decisions at key stages in the plan preparation process.
Relationship with adopted local plan(s)		The GNLP will supersede <ul style="list-style-type: none"> a) the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk (adopted March 2011, amendments adopted 2014) a) the Norwich Site Allocations and Site Specific Policies Local Plan (adopted December 2014)
Production milestones		
Commence document production		December 2015
The work includes a “call for sites” (an invitation to put forward specific		

Document Title	Greater Norwich Local Plan (GNLP)
development sites for inclusion in the GNLP, held in May-July 2016); evidence studies; Regulation 18 stage consultation on issues and options and site proposals held January-March 2018; further Regulation 18 stage consultations on additional sites (October – December 2018), and on a draft plan to include suggested policy options, growth strategy and site allocations (see below). For further details of the timetable for this work see www.gnlp.org.uk .	
Regulation 18 draft plan	January – March 2020
Publish pre-submission (Regulation 19) document	February – March 2021
Formal submission of GNLP to Secretary Of State (Regulation 22)	July 2021
Call for Gypsy and Traveller Sites Consultation	Ongoing
Housing trajectory examination in public hearings	Spring 2023
Gypsy and Traveller sites public hearings	July 2023
Main modifications published for consultation	Autumn 2023
Adoption of the Greater Norwich Local Plan	Early 2024
Monitoring and review	Annual Monitoring report and five year housing land supply updates

The National Planning Policy Framework states that policies in local plans should be reviewed to assess whether they need updating at least once every 5 years, and should then be updated as necessary. Such a review will need to determine whether any significant matters have arisen, for example changes to national policy or needs for development, that mean that

modifications should be made to the local plan or a new replacement local plan produced. The need for a review of policies in the GNLP will be assessed in due course following on from its adoption.

Document Title	East Norwich Masterplan
Role and content	A supplementary planning document for the East Norwich Strategic Regeneration Area to support policy in the GNLP for the coordinated redevelopment of the site and delivery of transformational change of this key area of Norwich.
Status	Non-statutory supplementary planning document.
Geographical coverage	East Norwich sites including the Deal Ground, Utilities Site, May Gurney and Carrow Works identified on East Norwich masterplan map ⁸ .
Joint working arrangements (if any)	A public-private partnership board (the East Norwich Partnership – ENP) was formed in 2020 to drive forward the regeneration of East Norwich and particularly the production of a masterplan. Following completion of the masterplan, the ENP was superseded by the East Norwich Delivery Board (from October 2022). The Board is led by Norwich City Council and membership includes Homes England, South Norfolk Council, Norfolk County Council, and the Broads Authority.
Conformity	As a non-statutory document there is no formal requirement for conformity with higher-level national policy statements, however the masterplan will need to align with the principles set out within the GNLP and National Policy.
Relationship with adopted local plan(s)	The East Norwich Masterplan will be adopted as an SPD by the Greater Norwich authorities and the BA to support policies set out in the emerging GNLP and the BA Local Plan.

Production milestones (provisional) Overall production period Consultation Adoption	November 2021 – March 2022, with updates in mid- late 2023 Late 2023/early 2024 Early 2024 (alongside or shortly after) adoption of GNLP)
Monitoring and Review	Ongoing

ANNEX

LOCAL DEVELOPMENT SCHEME FOR NORWICH, 2023-25
KEY DOCUMENT PROGRAMME

Document

Preparation of Local Development Scheme

ADOPTED DEVELOPMENT PLAN DOCUMENTS IN USE

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