

Report to Sustainable development panel
28 September 2016
Report of Head of planning services
Subject Greater Norwich Local Plan update

Item

5

Purpose

This report informs members of the progress of the Greater Norwich Local Plan.

Recommendation

To note:

- (1) progress made on the Greater Norwich Local Plan;
- (2) the content of the stakeholder forum Issues Paper and seek clarification or comment on any issues raised.

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

The local plan is funded from existing budgets.

Ward/s: All Wards

Cabinet member: Councillor Bremner – Environment and sustainable development

Contact officers

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Background documents

None

Report

Background

1. The recommendation to progress with a Greater Norwich Local Plan (GNLP) for Broadland, Norwich and South Norfolk was agreed by sustainable development panel (SD panel) on 24 February 2016 and vabinet on 9 March 2016, with the Local Development Schemes (LDS) being updated accordingly. The commitment to produce the GNLP was also agreed by Broadland and South Norfolk districts, with Norfolk County Council agreeing to work in partnership with the districts.
2. The GNLP will be a review and roll forward of the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk. It will provide both the planning strategy and allocate sites to enable the delivery of the homes, jobs and infrastructure needed in the area to 2036, whilst protecting environmental assets. When adopted, it will supersede the JCS and Norwich's Site Allocation Plan which plan to 2026, as well as other site allocation documents for Broadland and South Norfolk.

Progress on the Greater Norwich Local Plan

3. The progress made to date on joint working and plan making is set out in sections 3 and 4 of the September 2016 Greater Norwich Development Partnership (GNDP) report attached as appendix A. This includes:
 - The Greater Norwich Development Partnership Board has been established (see also below for further details);
 - A dedicated officer team with representatives from all four councils, based at County Hall, has been established;
 - Evidence on projected housing requirements to inform site allocations and affordable housing requirements has been gathered – this will be updated regularly through the plan making process;
 - Work has also begun on other elements of the evidence base including economic and viability evidence for the area;
 - A “Call for Sites”, to help to identify potential sites for allocation for a variety of uses, has been completed, with officers currently logging and mapping the sites, and site assessments being progressed;
 - Work has begun on the Sustainability Appraisal and Habitats Regulations Assessment to accompany the plan. The former will examine the environmental, social and economic implications of the plan. The latter will assess the potential impacts of different possible growth locations on internationally protected habitats;
 - A review of JCS area wide policies has begun;
 - Workshops to gain early stakeholder input on key issues the plan should address have been held. An Issues Paper, which is appendix 2 of the September GNDP report attached as appendix A, informed discussions;
 - Legal and planning “Critical Friends” have been appointed;
 - Work has begun on a communications strategy.

The Greater Norwich Development Partnership

4. On 25 May 2016 the SD panel agreed to recommend to cabinet that the Greater Norwich Development Partnership (GNDP) should be re-established to provide a forum for member oversight and discussion of GNLP plan making in accordance with the terms of reference which formed an appendix to the report. It also agreed to recommend to cabinet that the LDS should be updated to reflect revised timetables for the GNLP. These

recommendations were subsequently agreed by cabinet, with the other constituent authorities also agreeing the re-establishment of the GNDP.

5. The first meeting of the re-established GNDP took place on 5 September 2016.
6. The GNDP firstly agreed the terms of reference which had been considered by the sustainable development panel on 25 May, adding that they should be amended slightly to make it clear that the GNDP meetings would be held in public.
7. Secondly the panel considered an introductory report on the GNLP (appendix A). The GNDP noted progress made on the GNLP, agreed the next steps for plan preparation and provided early views on key issues and themes for the GNLP.
8. The main issues raised were (note – this is not an official minute of the meeting):
 - The importance of the communications strategy for the GNLP highlighting the benefits of the local plan in terms of providing new jobs, infrastructure and increased prosperity in the area, alongside providing new housing;
 - The merits, or otherwise, of retaining the Norwich Policy Area (NPA), of continuing to concentrate the majority of development in and around Norwich and of greater dispersal of development to market towns and villages;
 - The problems associated with the granting of planning permissions (largely on appeal) in recent years in a number of locations in the NPA above JCS requirements due to the lack of a 5 year land supply;
 - The merits or otherwise of establishing a Green Belt around Norwich.

The next steps

9. The high level timetable for plan production is in appendix 1 of the September GNDP report (appendix A).
10. It is intended that the sites submitted under the Call for Sites, the progress on evidence gathering, feedback from the stakeholder workshop sessions and emerging plan themes and directions will be considered at the partners' respective policy development panels/committees and at the GNDP in November/December 2016, including Norwich's SD Panel on 30 November.
11. The regulation 18 public consultation on the GNLP is programmed for October to December 2017. There will be further member engagement on the emerging plan between the planned November/December meetings and this consultation being begun.
12. Adoption of the GNLP is scheduled for late 2020.

Greater Norwich Development Partnership Board

5 September 2016

Item No 2

Greater Norwich Local Plan – Introductory Report

Mike Burrell – Greater Norwich Planning Policy Manager

Summary

The following report provides an introduction to the Greater Norwich Local Plan (GNLP) process for the first meeting of the Greater Norwich Development Partnership (GNDP) Board. The report summarises the work which has already been undertaken in terms of:

- the initial work to start the production of the GNLP, including identifying the housing requirement and the call for sites to accommodate growth;
- establishing the team to deliver the GNLP;
- existing and additional evidence needed to inform the content of the GNLP; and
- the preparation of the GNLP Issues Paper to facilitate stakeholder workshops in mid-September 2016.

Views are sought from the GNDP on any key directions and themes the members would wish to see considered at this early stage of preparing the plan.

Recommendation(s)

It is recommended that members of the GNDP:

- (i) Note initial progress made on the GNLP;
- (ii) Give early consideration to the key issues and themes for the GNLP;
- (iii) Agree the next steps for plan preparation.

1 Introduction

- 1.1 Broadland, Norwich and South Norfolk councils have an existing Joint Core Strategy (JCS) which plans to 2026, and supporting Local Plan documents which plan to at least 2026 and beyond in the case of the Broadland Growth Triangle Area Action Plan.

- 1.2 Working with Norfolk County Council, the three local planning authorities (LPAs) are now reviewing and rolling forward these documents in the form of a joint Greater Norwich Local Plan (GNLP) looking to 2036.
- 1.3 The GNLP will set out both the strategic planning policies and the site allocations and will replace the existing Joint Core Strategy (JCS), as well as the site specific elements of the respective Local Plans¹. The starting point for the review assumes that all sites identified for development in an existing local or neighbourhood plan remain appropriate.
- 1.4 This report sets out the work undertaken to date and the work which will lead to the identification of a favoured option and reasonable alternatives for the GNLP in 2017. It also seeks an initial view from the Greater Norwich Development Partnership (GNDP) Board on key directions and themes that members would wish to see considered at this early stage of preparing the plan.

2 Background

- 2.1 As part of the process of preparing the current local plans for Broadland and South Norfolk the respective examination Inspectors highlighted the need for an early review of the plans in order to extend the time horizon to the 15 years minimum recommended by the National Planning Policy Framework (NPPF). The replacement local plans therefore need to be in place by late 2020, five years after the adoption of the South Norfolk Site Specific Allocations and Policies Document and the Wymondham Area Action Plan.
- 2.2 To demonstrate the commitment to an early review of their local plans, Broadland and South Norfolk councils informed their Inspectors that the Greater Norwich authorities, working with North Norfolk and Breckland councils, had commissioned the Central Norfolk Strategic Housing Market Assessment (SHMA). The SHMA updates information on the overall number of new homes required along with the mix of homes and affordable housing requirements within that overall need. The SHMA projects the requirements forward to 2036, to mirror the end date of the GNLP, see 4.2 below for more details.

3 Joint Working

- 3.1 The authorities have a long track record of co-operation. The JCS was prepared by the GNDP and was originally adopted in 2011, with amendments adopted in January 2014.
- 3.2 Subsequently the focus has been on the implementation and delivery of the JCS policies and allocated local plan sites. This will continue to be the focus of the Greater Norwich Growth Board (GNGB).
- 3.3 On 24 September 2015, the GNGB resolved to recommend to the respective authorities that a GNLP should be produced, consisting of strategic policies (similar to those in the JCS) and site allocations. Development Management Policies would continue to be produced and reviewed separately by the three LPAs. The September report concluded that it would be *'more difficult and risky for each LPA to seek to address the wider strategic matters in a piecemeal, district-by-district basis. In addition, moving away from a joint plan*

¹ Broadland Site Allocations DPD; Broadland Growth Triangle Area Action Plan; Norwich Site Allocations and Site Specific Policies Local Plan; South Norfolk Site Specific Allocations and Policies Document; Long Stratton Area Action Plan & Wymondham Area Action Plan.

would convey a negative message on our commitment to work together to deliver economic growth’.

- 3.4 A key driver for the inclusion of sites within the GNLP is the emphasis on deliverability; the approach in the JCS meant that there was a considerable delay between setting the growth requirements and the allocation of sites to deliver that growth. Amongst other implications, this has not helped with securing a five year housing supply in the Norwich Policy Area (NPA).
- 3.5 The recommendation to progress with a GNLP was reported to the respective authorities and their Local Development Schemes (LDSs) were updated accordingly:

Authority	September 2015 GNGB recommendation reported	Updated LDS
Broadland	Cabinet, 19 January 2016	
Norwich	Sustainable Development Panel, 24 February 2016	Cabinet, 9 March 2016
South Norfolk	Cabinet, 2 November 2015	Cabinet, 15 February 2016

The GNDP Board

- 3.6 Because the production of a new local plan is not within the terms of reference of the GNGB, governance for plan production will fall under a separate body. It was also considered that a broader membership would be beneficial for the plan making role of the group overseeing the GNLP. Following the GNGB meeting of 24 March 2016 the Greater Norwich authorities have agreed that the GNDP Board will be re-established to oversee at least the initial stages in the production of the GNLP. This was agreed by the respective authorities during May and June and the relevant councillors were nominated to make up the Board. The GNDP Board is not a decision making body and this responsibility still sits with the respective councils. Therefore, member engagement will be both through the GNDP Board and through the various committees of the constituent authorities.

The GNLP team

- 3.7 In order to progress the GNLP, a team has been set up and Mike Burrell (Norwich City Council) has been appointed as Greater Norwich Planning Policy Manager. The team comprises one further full time equivalent member of planning staff from Norwich, two each from Broadland and South Norfolk and one from Norfolk County Council; these full time equivalent hours are distributed across more members of staff to maximise the benefits of the existing expertise within the authorities' teams. Additional staff will provide dedicated support for the work of the GNLP team.
- 3.8 The work of the GNLP team is overseen by the Infrastructure Delivery Board (IDB), made up of senior level representatives from the partner authorities and New Anglia LEP. As well as the work streams, the IDB will oversee the GNLP budget and provide coordination with the GNGB and the Greater Norwich Projects Team's work on infrastructure and delivery.

4 Work to date

- 4.1 Previous reports to the respective authorities have noted that work has already been progressing on a number of elements of the GNLP; the following is an

updated summary.

Strategic Housing Market Assessment (SHMA)

- 4.2 As noted above the Greater Norwich authorities initiated the process of plan review through the commissioning of a SHMA which sets out the projected housing requirements for Central Norfolk to 2036, known as the objectively assessed need (OAN) for housing. The SHMA takes into account the growth aspirations of the Greater Norwich City Deal and equates to approximately a further 12,000 new homes for Greater Norwich between 2012 and 2036, over and above those already built, permitted or allocated, as follows:

SHMA Objectively Assessed Need (April 2012 to March 2036)	52,170
Already built (April 2012 to March 2015)	4,160
Committed sites (at 1 April 2015)	23,375
Emerging sites (at 1 April 2015)	12,782
Remainder to be allocated	11,853

- 4.3 The above figures assume all of the committed sites (permissions and allocations) and emerging allocations will be delivered by 2036, but does not make any assumption about future windfall. This position will be updated as the plan progresses to reflect further completions and additional commitments made since 1 April 2015, along with any changes in the underlying populations/ household projections which underpin the OAN or other relevant changes to evidence.
- 4.4 The NPPF requires local plans to “meet objectively assessed need with sufficient flexibility to adapt to rapid change”. To enable the delivery of OAN, and to help maintain a 5 year land supply, there will be a need to allocate more housing than the minimum OAN figure. This has been reflected by Inspectors’ decisions at examinations into local plans, including for the recent Growth Triangle Area Action Plan.
- 4.5 The exact level of allocation that is appropriate will need to be established through the production of the GNLP taking into account any change in Government policy and relevant inspector’s decisions. An example of how additional allocations above OAN might be reflected in Local Plans is highlighted by the recent Local Plans Expert Group (LPEG) recommendation to Government. This proposes that an additional 20% buffer of ‘reserve’ sites should be identified for all unbuilt homes in local plans. If applied to the GNLP this would mean 52,170 OAN – 4,160 already built = 48,010 remainder of the OAN, 20% of which would equate to reserve sites for a further 9,600 dwellings. Whilst currently far from certain, a 20% uplift is considered likely to represent a “high end” scenario.
- 4.6 It should also be recognised that the OAN in the recently published Central Norfolk SHMA already includes an element of uplift in Greater Norwich related to commitments to jobs growth. The OAN itself may also change as new Government projections for population and household increase are released; this could result in increases or decreases in the final GNLP requirements.
- 4.7 The SHMA also sets out the proportion of affordable housing required to meet the needs of the area, although this is likely to be reviewed to take into account

the Government's Starter Homes requirements.

Call for Sites

- 4.8 Because the GNLP will include site allocations as well as strategic policies a formal 'call for sites' was undertaken between 16 May and 8 July 2016. The call invited the submission of sites for all uses, including housing, employment, retail and town centre uses, recreation and 'Local Green Spaces', the latter of which provides special protection for green areas of particular importance to local communities.
- 4.9 The call for sites was sent to planning and land agents, known sites owners (including those who submitted their sites for inclusion in previous plans), local businesses who may have aspirations to expand and town and parish councils. The call also received extensive publicity in the Eastern Daily Press.
- 4.10 The call invited submission of both green and brownfield sites, from small urban plots to potential large-scale greenfield developments and the authorities have sought to glean as much information as possible from those submitting the site(s) to support the subsequent assessments.
- 4.11 These sites are currently being logged and plotted and further details will follow in the November GNLP report.

Site Assessment

- 4.12 Each of the submitted sites is being assessed, alongside other sites such as unimplemented allocations from the existing local plans and unimplemented (or partially implemented) extant planning permissions. This process is not intended in any way to delay the progress of allocated sites in adopted plans to achieving planning permission given that the GNLP will not be adopted until late 2020.
- 4.13 The sites are being assessed through a Housing and Economic Land Availability Assessment (HELAA). A HELAA methodology, based on the Government's requirements, has been jointly prepared by the Norfolk LPAs as part of the Norfolk Strategic Framework (NSF) process. The assessment of sites will also form part of the Sustainability Appraisal (SA) of the plan.

Sustainability Appraisal & Habitats Regulation Assessment

- 4.14 A key element of the production of any plan is the assessment of the potential impacts of the emerging policies and allocations. Sustainability Appraisal (SA), which is undertaken alongside the development of the plan itself, will examine the environmental, social and economic implications of the proposed policies and allocations and help identify how the proposals can be refined and impacts mitigated. Consultation on the first stage of SA, a scoping report, took place between 20 June and 15 August 2016. Officers are currently finalising the scoping report. The SA will be undertaken by the GNLP together with Lepus Consulting.
- 4.15 In addition the Landscape Partnership has been appointed to undertake the Habitats Regulation Assessment (HRA), which will assess the potential impact of different possible growth locations on internationally protected habitats; the first stage of this is a critical evidence review to identify any outstanding information which is needed to complete the assessment.

Reviewing the JCS area wide policies

- 4.16 Since the GNLP will be a review and roll forward of the JCS, the GNLP team is undertaking an initial review of JCS area wide policies (policies 1 to 8), for example to identify any areas where they have been superseded by national policy changes.

Critical friends

- 4.17 Legal and planning 'critical friends' are being engaged to provide ongoing external challenge and support to ensure the work on the GNLP is legally compliant and produces a sound plan when set against the context of the existing planning legislation and proposed changes.

Timetable

- 4.18 A broad timeline for the production of the GNLP has already been shared with the GNGB; an updated version of this timeline highlighting the key stages at which member involvement will be required is attached at appendix 1.
- 4.19 In line with the current regulatory requirements and in order to produce the GNLP within the required timeframe the stages in document production have been streamlined. Full public involvement will take place at the Regulation 18 consultation stage, which will set out a favoured option and reasonable alternatives, and Regulation 19, which will be the proposed submission plan.
- 4.20 The recent LPEG report to Government has recommended that local planning authorities be able to make changes to the proposed submission version of the plan following Regulation 19. This proposed change is supported by the Greater Norwich authorities as an aid to speeding up the plan process.

5 The Issues Paper and Stakeholder Workshops

- 5.1 The first substantive stage in the development of the plan is a series of stakeholder workshops. Invitations were sent in July for workshops during the week commencing 12 September. The purpose is to gain early stakeholder input on the key issues the plan should address through discussion of the Issues Paper questions. The Issues Paper is attached in appendix 2.
- 5.2 Separate workshops will cover the Issues Paper's themes of: Housing, Transport, the Environment, and the Economy, with the strategic distribution of growth being a key consideration for each of these. In addition, area based workshops will give the opportunity for other organisations, such as town and parish councils, to input at this early stage. The outputs of the workshops will be reported to members in November.

Key Issues for the GNLP Board

- 5.3 While it would not be appropriate to pre-empt discussions and analysis by answering the following questions, it would be useful for members to advise on any key factors that they consider will influence consideration of:
- Whether the Greater Norwich area should be divided into two or more policy areas;
 - Potential patterns of growth;
 - The potential for a new settlement or settlements;
 - Particular locations of growth and restraint;

- Delivering major new infrastructure;
- The desirability of a Green Belt for Norwich;
- Rolling forward area wide policies (JCS policies 1 to 8).

This is by no means an exhaustive list and GNDP members may wish to raise other key considerations on the direction of the plan at this stage.

6 Evidence

6.1 Good quality evidence is key to developing the plan. It is also important that evidence is proportionate and is collected cost effectively. In some cases evidence will be required to assist in the identification of the most appropriate locations for additional growth, in others it will be required at a later stage of plan making to, for example, provide clarification on the infrastructure required to serve the growth options promoted. Consequently evidence gathering will involve:

- Specific studies on core issues such as the local economy and development viability. In these cases it will be necessary to commission dedicated new evidence.
- Where possible, existing JCS evidence will be updated in consultation with key stakeholders. Ongoing engagement is planned with service and infrastructure providers such as Anglian Water, as well as statutory consultees and regulatory bodies such as the Environment Agency, Natural England and Historic England, to fully understand the growth constraints and opportunities. This engagement will cover a wide range of issues including education, health, social infrastructure (sports facilities, community buildings etc.) and utilities.

Transport for Norwich (TfN)

6.2 The current Norwich Area Transportation Strategy (NATS) was adopted in 2004. A small number of minor policy changes were subsequently agreed in April 2010 as part of the development of the JCS. Given the date of the NATS, many of its measures have now been implemented and others need to be reviewed. To assist the development of the GNLP to 2036, a commitment has been made by the NATS Board to update the strategy alongside the GNLP.

7 The Next Steps

Development of the 'plan alternatives'

7.1 Following the workshops the next stage for the GNLP will be the development of a series of options for the plan. The steer on key considerations from the GNDP Board, the outcomes of the stakeholder workshops, the evidence gathered to date and the results of meetings with key infrastructure providers will help to shape the content of the strategic policies and identify areas for possible growth in the GNLP.

7.2 The GNLP team is currently undertaking a high level assessment of the capacity of different locations to accommodate growth.

7.3 Member input in November will help identify a range of plan alternatives which can then be worked up further for members to review in early 2017. The robustness of this stage in the plan preparation will be essential to support the

choice of any favoured option for the Regulation 18 consultation. The timetable at appendix 1 provides details.

8 Issues and Risks

Other resource implications (staff, property)

- 8.1 As noted above, the Greater Norwich Planning Policy Manager has been appointed and a team of planning staff seconded from the four authorities. Provision is also being made for dedicated support staff. The budget to deliver the GNLP is being overseen by the IDB. The GNLP team has recently moved to permanent accommodation in County Hall.

Legal implications

- 8.2 The Greater Norwich authorities are required to have an up-to-date Local Plan and Broadland and South Norfolk Councils have made commitments through the examination of recent plans to a timescale for getting the GNLP in place. NPLaw is providing ongoing advice to ensure that the plan is produced in accordance with current Regulations and with any amendments to those Regulations.

Risks

- 8.3 The risk of not preparing a replacement for the JCS and maintaining a supply of allocated sites is that the plans become increasingly out of date and subject to challenge.
- 8.4 The GNLP is being produced to a streamlined timetable and requires prompt agreement across the participating authorities; the most significant risks are unforeseen events that cause delays within what is currently a very tight timeline and/or significant changes in Government policy which provide new challenges for the plan.

Equality

- 8.5 The GNLP will be supported by an Equalities Impact Assessment.

Environmental implications

- 8.6 The GNLP process is underpinned by national requirements to achieve sustainable development and is supported by both an HRA and SA process. The plan will also continue to identify Green Infrastructure and other environmental enhancements as part of the policies and proposals.

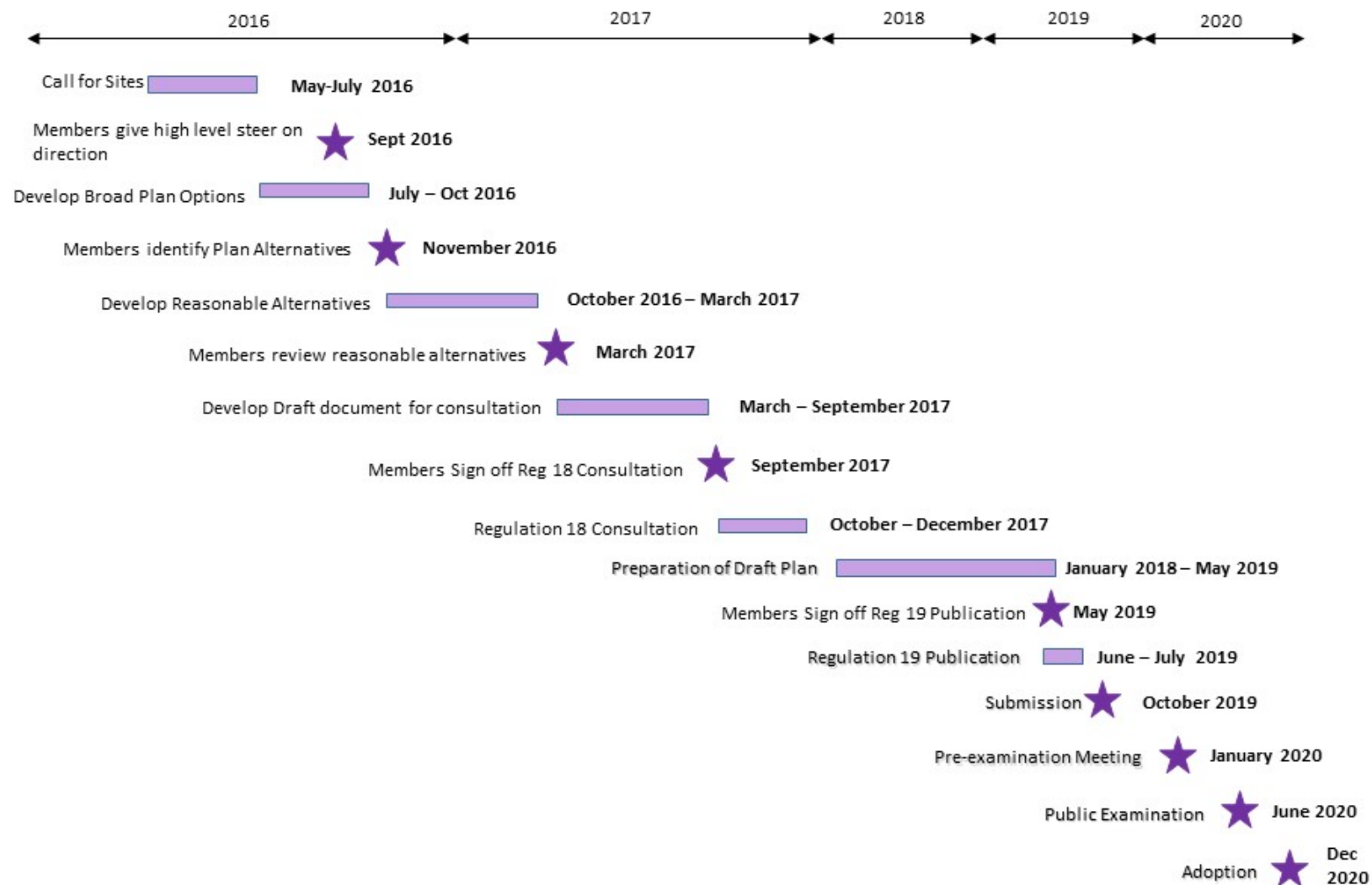
Officer Contact

If you have any questions about matters contained in this paper please contact:

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Appendix 1

Greater Norwich Local Plan: High Level Timetable to Adoption



Appendix 2

Greater Norwich Local Plan

Issues Paper

July 2016

This paper has been issued as a discussion document intended to stimulate technical debate at the Greater Norwich Local Plan workshops in September 2016. It has been prepared by district and county council officers and does not represent policy.

Preamble

This “issues” paper has been produced to support discussions at stakeholder workshops designed to help inform the early stages of development of the **Greater Norwich Local Plan (GNLP)**.

The GNLP will need to address the challenge of rolling forward the existing local plan strategy, set out in the Joint Core Strategy (JCS) and site allocation plans, to 2036. It will also need to support the positive approach to growth set out in the City Deal. The GNLP will provide both the strategic policies and allocate the sites to enable the sustainable delivery of the additional growth our early evidence shows we will need.

This paper consists of an introduction followed by sections focussing on key inter-linked issues: the strategic distribution of growth; transport; housing; the economy and the environment. Each section contains questions intended to stimulate discussion at the GNLP stakeholder workshops.

Each workshop is focussed on its single topic (e.g. transport) but will also consider how it impacts on other topics and, in particular, the approach to the strategic distribution of growth. The discussions at the stakeholder workshops will help inform the early stages of plan development and should primarily focus on the issues set out in this paper. Site specific issues are unlikely to be relevant to these discussions unless they will have a significant influence on the strategic direction of the GNLP. Further opportunities will exist for representations to be made on site specific issues at later stages of the plan making process.

The workshops are the first stage in stakeholder engagement and will assist the councils in drafting the consultation version of the plan, the “Favoured Options and Reasonable Alternatives”. This will be subject to full public consultation scheduled for October 2017.

Section 1 - Introduction

National Planning Policy

1.1. The **National Planning Policy Framework (NPPF)** sets out Government’s policies for Planning. The NPPF requires Local Plans to be “aspirational but realistic”². Local Plans should contain strategic policies to deliver, amongst other things: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure; climate change mitigation and adaptation; and, conservation and enhancement of the natural and historic environment, including landscape.

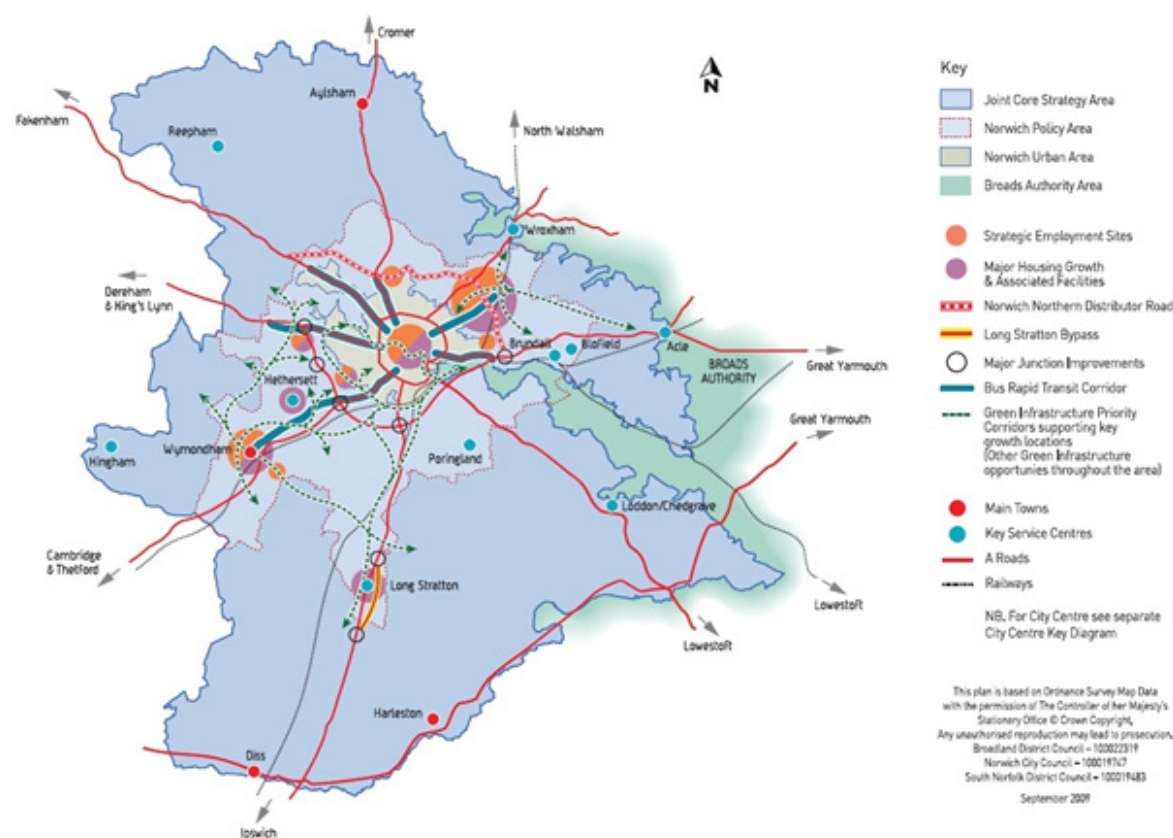
Existing local planning documents

1.2. The **Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS)** establishes a planning strategy for 37,000 new homes and 27,000 new jobs between 2008 and 2026. The development sites to achieve this growth are set out in six site specific planning documents³. The **Greater Norwich City Deal** provides tools to support the delivery of the infrastructure, jobs and skills needed to deliver the JCS. The **Greater Norwich Infrastructure Plan (GNIP)** and **Annual Growth Programmes** are used to manage investment in new infrastructure to deliver this strategy. The GNLP will need to take account of **New Anglia Local Economic Partnership’s Strategic Economic Plan (SEP)**.

² NPPF, 2012, paragraph 143, pg. 37

³ The six site specific documents within the Greater Norwich Area are the: Broadland District Council Site Allocations DPD; Growth Triangle Area Action Plan; Norwich City Site Allocations DPD; South Norfolk Site Allocations Local Plan; Wymondham Area Action Plan; and, Long Stratton Area Action Plan.

Figure 1 The JCS Key Diagram



1.3. The content and implementation of the JCS, Site Specific documents and the City Deal will strongly influence the strategy in the GNLP. The JCS growth strategy to 2026 is summarised in its Key Diagram in figure 1 above.

The Greater Norwich Local Plan

1.4. The **GNLP** will set out strategic planning policies and identify sites to meet the need for development to 2036 building on the adopted plan. When adopted, the GNLP will supersede the JCS and the six site specific planning documents. The GNLP will not set out locally specific development management policies.

1.5. Early evidence indicates that the GNLP will need to plan to meet the need for 52,170 dwellings between 2012 and 2036. This is approximately 12,000 more homes than are contained in sites with planning permissions and sites allocated in site specific planning documents.

Delivery

1.6. A fundamental thread for the GNLP will be to ensure that all policies and sites are deliverable. Currently the authorities work together closely to deliver the infrastructure that supports growth. Work on the **Norfolk Strategic Framework (NSF)**, which has included engagement with key infrastructure providers, has not identified any overriding infrastructure constraints to the likely scales of growth to 2036 that cannot be overcome. The precise infrastructure needs of the GNLP will be dependent on the location and distribution of development. Where localised infrastructure constraints exist they will influence the strategy and allocations.

Section 2 – The Strategic Distribution of Growth

Background

2.1 The strategic distribution of growth is fundamental to the plan's success. Three overriding considerations for the distribution of new growth are:

- The pattern of existing and planned development. The latter is set out in the JCS and in the committed permissions and allocations that deliver it;
- Delivery - ensuring that the GNLP does all it can to deliver necessary housing and employment growth;
- Sustainability – for example ensuring new housing is well related and accessible to jobs and services, reduces reliance on the private car and avoids environmentally sensitive areas.

2.2 The pattern of new growth will also be influenced by infrastructure provision including:

- Recent and planned improvements such as the NDR, A47 dualling and junction improvements, bus priority measures, and the cycling network;
- Constraints - such as lack of waste water capacity in some areas; and
- Opportunities – such as forecast capacity in local schools.

2.3 Growth and the pattern of development in neighbouring districts outside the Local Plan area may also have an influence. In particular:

- 4,000 houses are planned in Attleborough, and 5,000 in Thetford;
- Energy related economic growth taking place at Gt Yarmouth and Lowestoft and
- The role of out-of-area “border” towns such as Beccles and Bungay.

2.4 The distribution of development around some urban areas in the UK is strongly influenced by designated Green Belts. Currently there is no Green Belt in the Greater Norwich area but one has been promoted by the Campaign to Protect Rural England (CPRE).

2.5 Green Belts prevent most types of development and are intended to prevent urban sprawl and the coalescence of settlements. Their primary intent is not therefore to protect attractive countryside, which can be sought through other policy measures.

2.6 If a Green Belt were introduced in the area, the overall growth needs of Greater Norwich would still need to be met and the GNLP would also have to demonstrate how growth needs could be delivered over a longer period than just the plan period to 2036. This would likely require allocating or safeguarding significant amounts of urban fringe land on the inside edge of the Green Belt, or as “holes” within it, alongside the identification of land outside. The metropolitan Green Belt, designated in the 1950s, was supported by a programme of new towns and expanded towns to deliver growth.

2.7 The implications of a Green Belt are far reaching for the growth strategy and should be considered for each remaining issue in this paper.

Delivering homes – site size and concentrated or dispersed growth patterns

2.8 The size of sites affects delivery:

- The smaller a site the more likely it is to have limited site-specific infrastructure requirements, be more attractive to smaller builders (broadening the range of firms engaged in delivery) and to be able to take advantage of any capacity in existing infrastructure. Very small sites of fewer than 5 dwellings are more likely to be “windfall” rather than allocated in the GNLP;
- Larger developments have longer lead-in times but benefit from economies of scale, tend to deliver well once started, and are more likely to provide and support new infrastructure.

Current commitment and distribution

2.9 The plan could seek a high degree of concentration of growth or greater dispersal. Concentration will generally be delivered by large sites, although it is also possible to have a number of medium or smaller sites concentrated around a village or town. Delivery may be enhanced by greater geographical dispersal to widen markets but there will also be a greater tendency for residents to need to travel to jobs and services with less opportunity to use public transport, cycling or walking. Dispersal can increase the costs of service provision such as for school transport.

- 1. To ensure delivery, what is likely to be the best balance between small, medium and large sites and how will this vary across the area?**
- 2. What is likely to be the best balance between concentration of sites and dispersal?**

Towns, Key Service Centres, Service Villages and Other Villages

2.10 Policies 13 to 17 of the JCS identify a hierarchy of settlements that reflects the scale and type of services and facilities available. The approach to defining each type of settlement is set out in the supporting text to each policy. Generally speaking the scale of planned growth in a town or village reflects this hierarchy, but also takes account of the settlement's accessibility to Norwich and other constraints and opportunities.

- 3. Are the JCS criteria for defining the hierarchy still appropriate and should any towns or villages move up or down?**
- 4. Should the Plan provide higher levels of housing and employment growth in a wider range of settlements, including encouraging growth in small villages with few or no services?**

Allocations, neighbourhood plans and rural development

2.11 A possible approach for the GNLP would be to allocate all the sites required to deliver the identified level of need for homes and jobs only in locations at the higher end of the settlement hierarchy, leaving neighbourhood plans to allocate additional sites and review settlement boundaries in smaller settlements. A local plan must be able to demonstrate that it can deliver the scale of growth needed and it is normal practice to identify additional opportunities for homes and jobs to ensure that needs are met (i.e. to over-allocate slightly to ensure there is a choice of sites). The neighbourhood plan allocations would contribute to these additional opportunities. This approach would provide flexibility and choice, but also has greater uncertainty.

- 5. Is this approach reasonable or appropriate?**
- 6. Is the neighbourhood planning process likely to deliver sufficient growth and flexibility?**
- 7. Where would the cut-off be (at which tier of the hierarchy)?**

Greater Norwich Planning Policy Areas

2.12 The JCS currently divides Greater Norwich into three separate policy areas, the Norwich policy area (NPA), the rural area of South Norfolk and the rural area of Broadland (see figure 1 above). The NPA is intended to keep Norwich related growth as close as possible to the Norwich urban area (reflecting the area's importance as an employment, retail and leisure hub). Historically, with Broadland, Norwich City and South Norfolk producing separate local plans, the policies of the NPA allowed growth to be co-ordinated and distributed across the three local planning areas. Currently, the JCS allocates around 90% of housing growth and all strategic employment locations to the NPA. The NPA is an area over which a five year supply of housing is currently calculated, with separate assessments of the remaining parts of Broadland and South Norfolk.

2.13 Given that this plan includes site allocations, the need for retention of the NPA needs to be considered. Since the role of the NPA has been to provide the strategic framework for subsequent local plan documents allocating sites, it may be that alternative policy approaches are now more appropriate to steer the identification of sites. A policy providing a criteria-based approach which continues to focus most growth near Norwich could be considered. Alternatively, greater dispersal of some of the growth away from the Norwich urban area than previous plans promoted may have benefits in delivery terms.

2.14 With the more extensive growth plans for Broadland, Norwich and South Norfolk into the future one approach would be to remove the NPA definition and area entirely and regard the whole area of Broadland, Norwich and South Norfolk as a planning area in this context. Any development would still be subject to a criteria based sequential approach to ensure the key elements of sustainability and deliverability remain.

2.15 Should we decide to retain the NPA approach, consideration will need to be given to whether the NPA's current boundaries remain appropriate.

<p>8. Given the above explanatory paragraphs, what is the best policy approach for managing the distribution of growth across the three districts?</p>

The influence of existing strategic growth locations

2.16 The selection of the existing growth locations in the JCS (identified on the Key Diagram in figure 1 above with further details in figure 2 below) was supported by wide ranging evidence including sustainability appraisal. These areas are supported by varying levels of existing services and employment opportunities, and by infrastructure investment. Each of these locations could be considered for additional growth, taking account of local constraints and opportunities. However, there may be questions about whether some of these areas could or should take significant further growth, or whether a period of consolidation for them, with growth focussed elsewhere, would be a more appropriate strategy.

2.17 Within the urban area, redevelopment sites will continue to come forward. While the overall scale of land that can be found is likely to decline through time, there is some demand for more intense use of sites. The scale of growth that can be accommodated will depend on the approach to intensification.

Figure 2 Current growth commitment

Current growth location	Current growth commitment
Norwich (City Council area)	Around 7,400 homes and office development.
NE quadrant (Growth Triangle and adjacent locations)	Around 13,400 homes in the Growth Triangle and adjacent parts of parishes; 140ha of employment land.
Easton/Costessey area	Around 1,800 homes; 13 ha of employment land at Longwater, plus additional potential at the emerging Food Enterprise Zone.
Crangleford/Colney	Around 1,500 homes; 44 ha of employment land allocated at Norwich Research Park (NRP)/Norfolk and Norwich University Hospital (NNUH).
Hethersett	Around 1,400 homes; Close to NRP/NNUH.
Wymondham	Around 2,200 homes; 20 ha of employment land in Wymondham and 20 ha at Hethel.
Long Stratton (part Tharston parish)	Around 2,000 homes; 12 ha of employment land; Bypass to be provided as part of current committed development; Capacity for sewage disposal may be a significant constraint.

9. Are any of the existing locations suitable for significant additional growth?

10. Are there constraints to further growth and could they be overcome?

11. Can the GNLP help speed up delivery of the existing commitment in these locations?

The potential for new settlements/significant urban extensions

2.18 The GNLP could consider new opportunities for large scale growth, either as new settlements or urban extensions. New settlements are rarely completely new and usually involve the expansion of an existing settlement. Large scale development has a long lead in time but could deliver later in the plan period and/or prepare the ground for the next plan. A number of locations for large scale growth have been proposed to the councils in the past such as Acle, ex RAF Coltishall, and Mangreen. Other locations may also be proposed.

12. Are there opportunities for strategic growth outside the areas identified in the JCS, and what would be the key issues?

13. What would be the role of transport access including rail?

14. To what extent could and should a new or expanded settlement be “stand alone”?

Other options and issues for the strategic distribution of growth

15. Are there and other potential options for the strategic distribution of growth which have not been covered above?

Section 3 - Transport

3.1 Transport spans a wide range of issues, with some being very localised and others linked to the wider economy and connectivity of the Greater Norwich area as a whole. Transport policy and Investment in transport projects and will influence and can be influenced by the scale and location of growth and how those new travel demands are met. To focus discussion, issues are considered under the broad headings of rail, air, major road connections, the Norwich Urban area and rural areas.

Rail

3.2 Rail connections provide important strategic links to the plan area and are important to the vitality of the local economy. Existing JCS policy promotes enhancement of rail services, including improved journey time and reliability to London and Cambridge, station improvements and innovative use of the local rail network.

3.3 The current franchise renewal process will result in commitment to delivering new and improved train services, though the detail is awaited.

16. How can rail infrastructure and services be developed to support the housing and economic growth needs of the area?

Air

3.4 The JCS supports the growth and regional significance of **Norwich International Airport** for both leisure and business travel to destinations across the UK and beyond. Because of its connections, the airport is a focus for airport related employment and sites have been identified in adopted plans for further employment growth. Completion of the NDR by 2018 will improve surface access and connection to the trunk road network.

17. Should the GNLP continue to promote the airport and related activities to support the housing and economic growth needs of the area and if so how?

Major Road Connections

3.5 The **A11** provides access to the A14, Cambridge and London. Dualling from Thetford to Fiveways was completed in late 2014 removing the last single carriageway section between the A11 and A14. On the back of this an economic study has been commissioned looking the opportunities the improved route can bring to the area. Longer term aspirations include grade separation at the Fiveways junction at Mildenhall and improving the A11/A14 junction near Newmarket to cater for all movements.

3.6 Highways England (formerly the Highways Agency) carried out a Route Based Strategy (RBS) on the **A47**, including the A12 from Great Yarmouth to Lowestoft. The findings of the RBS informed Government's Roads Investment Strategy. The investment plan identifies a number of schemes on the A47 in the GNLP area that government have committed to progress for delivery by 2021. These are;

- **A47 North Tuddenham to Easton dualling;**

- **A47 Blofield to North Burlingham dualling;**
- **A47/A11 Thickthorn Junction improvement.**

3.7 The Longwater junction has been the focus of significant development. A scheme funded from a mix of developer contributions and the public sector is being developed to improve traffic flows in the area.

3.8 The A47 Alliance is a group of councils, MPs and business leaders. The long term ambition of the group is for complete dualling of the A47 and grade separation of junctions along the route.

3.9 The **A140** south of Norwich is a former trunk road and provides a strategic link to Ipswich, the port of Felixstowe and the South East. There has been a long term aspiration for a **Long Stratton Bypass** to improve this route. The JCS supports a Long Stratton Bypass and seeks to achieve the bypass by identifying Long Stratton as a growth location as a means of securing its delivery. An Area Action plan for Long Stratton has been adopted which sets out more detailed policy to secure delivery of the bypass.

3.10 Main roads that connect urban areas can be protected from development that would erode their strategic function by **corridors of movement policies**. Protection does not necessarily mean no development, but more weight would be put on ensuring that growth does not have a detrimental effect on the efficiency of the strategic road network.

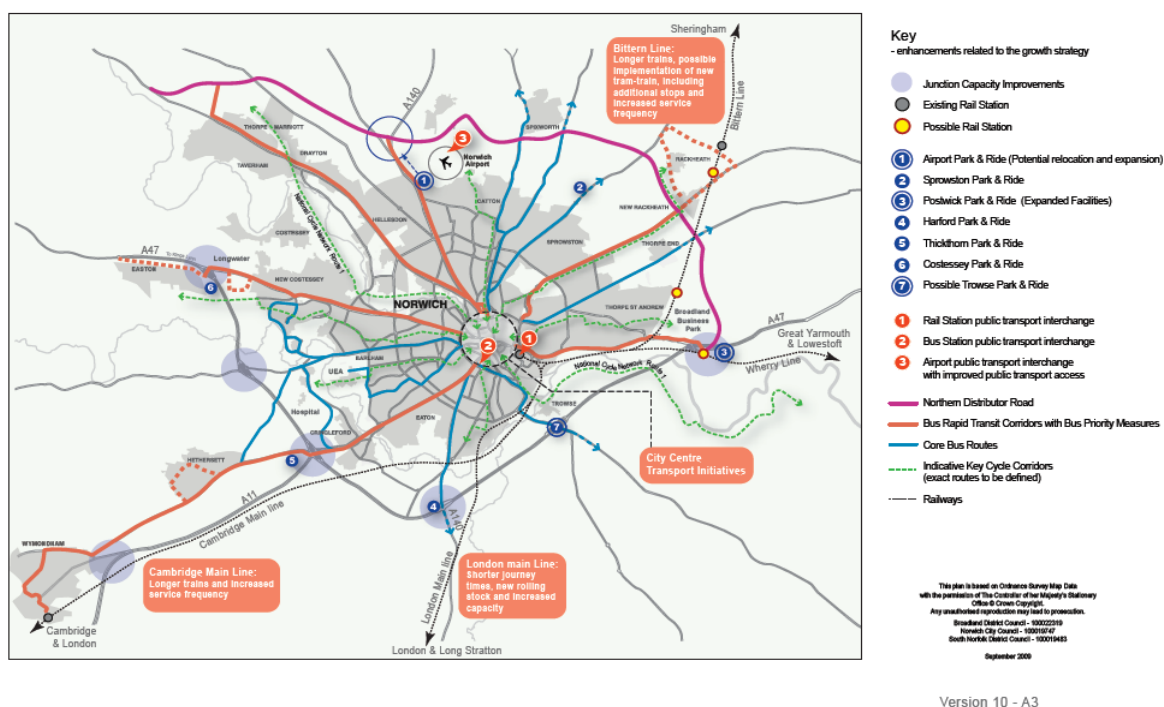
18. Are there any major road connections the plan should promote, protect and improve?

Norwich Urban Area

3.11 Transport in and around the urban area of Norwich has been developed through the **Norwich Area Transportation Strategy (NATS)**. An implementation plan was devised for NATS to set out the range of individual projects and interventions to meet the strategy.

Figure 3 NATS proposed implementation plan

Norwich Area Transportation Strategy - proposed implementation plan



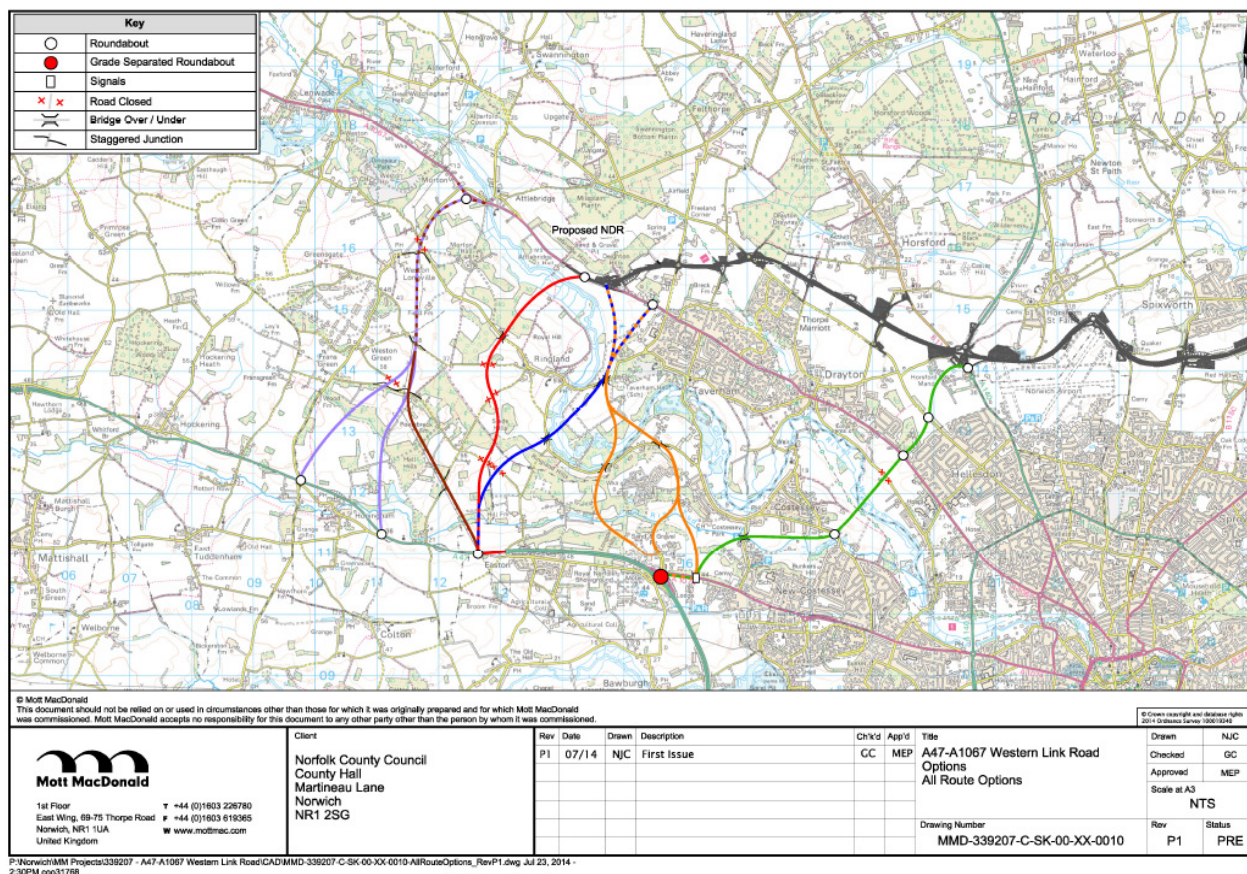
3.12 The JCS and NATS implementation plan were developed in parallel. A number of focused changes were made to the policy to support delivery of the JCS. The existing strategy and implementation plan supports the current approach to planned growth.

3.13 The key elements of NATS as contained within the JCS are delivery of the **Norwich Northern Distributor Road (NDR)**, the promotion of six Bus Rapid Transit (BRT) routes serving areas of significant growth, continued support and development of Park and Ride to manage city centre car parking pressures and enhancements within the city centre to aid walking and cycling.

3.14 In addition to the schemes already being delivered, there is funding secured for targeted improvements to tackle congestion on the inner and outer ring road; bus improvements on Salhouse Road and further phases of work within the city centre to reduce through traffic and improve conditions for pedestrians, cyclists and bus service operation.

3.15 Alongside the development of the GNLP, a NATS policy and implementation plan review will be carried out. The outcomes of these issues workshops will also inform early stages of the NATS review.

19. What changes should be made to the current Norwich Area Transportation Strategy and the focus of the schemes in the current implementation plan to support the GNLP?



Norwich Northern Distributor Road

3.16 The NDR is scheduled to be open by 2018. There remains some pressure to explore a link between the planned western junction of the NDR with the A1067 Fakenham Road and the A47. Norfolk County Council is investigating the issues associated with this. A report was presented to its Environment, Development and Transport Committee in September 2014 which included potential routes (see figure 4 below).

Figure 4 Potential “Western Link” road routes

20. Should the plan support a road link between the A47 and the A1067? If so, what are the reasons for this?

Rural Issues

3.17 Market towns contain a range of services and facilities such as employment, retail and education. Existing policy is to ensure, as far as is practicable, that market towns are served by public transport services. This allows people in the more rural areas without access to a car to get to opportunities likely to be sited in market towns. Bus services are generally run commercially by private companies and this can mean that there are few services, particularly at evenings and weekends. Demand responsive services, often run by community groups, are an alternative to scheduled bus services in many areas but

can sometimes be overlooked by potential users, or seen as offering services only to particular groups such as the elderly.

3.18 The main considerations within market towns are cycle and pedestrian networks (including the pedestrianisation of centres) and the amount of car parking provision.

21. How should rural transport issues influence the GNLP's approach to housing, employment and other development?
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Delivery

3.19 An important issue for any plan is that it must be deliverable. GNLP challenges are likely to be meeting the housing needs of the area and strengthening the local economy. Transport policy will continue to be an important influence on the delivery of housing and jobs and should support the wider aims of the plan. Views on how this can be achieved are varied.

22. How can transport policy and implementation increase housing delivery and grow the local economy and what is the evidence to support this?

Section 4 - Housing

Central Norfolk Strategic Housing Market Assessment

4.1 A new **Strategic Housing Market Assessment (SHMA)** was published in January 2016. It covers a wider area than the three Greater Norwich districts to include Breckland and North Norfolk districts, because evidence suggests that the Housing Market Area (HMA) covers these two districts too. The SHMA methodology is consistent with national policy and guidance, and has taken account of planning inspectors' decisions and High Court judgements. It covers the period 2012 to 2036

4.2 Having established the HMA, demographic projections from the Office of National Statistics, local trends, market signals⁴ and employment forecasts and commitments were used to establish the Objectively Assessed Need (OAN) for Central Norfolk area as a whole, and for Greater Norwich.

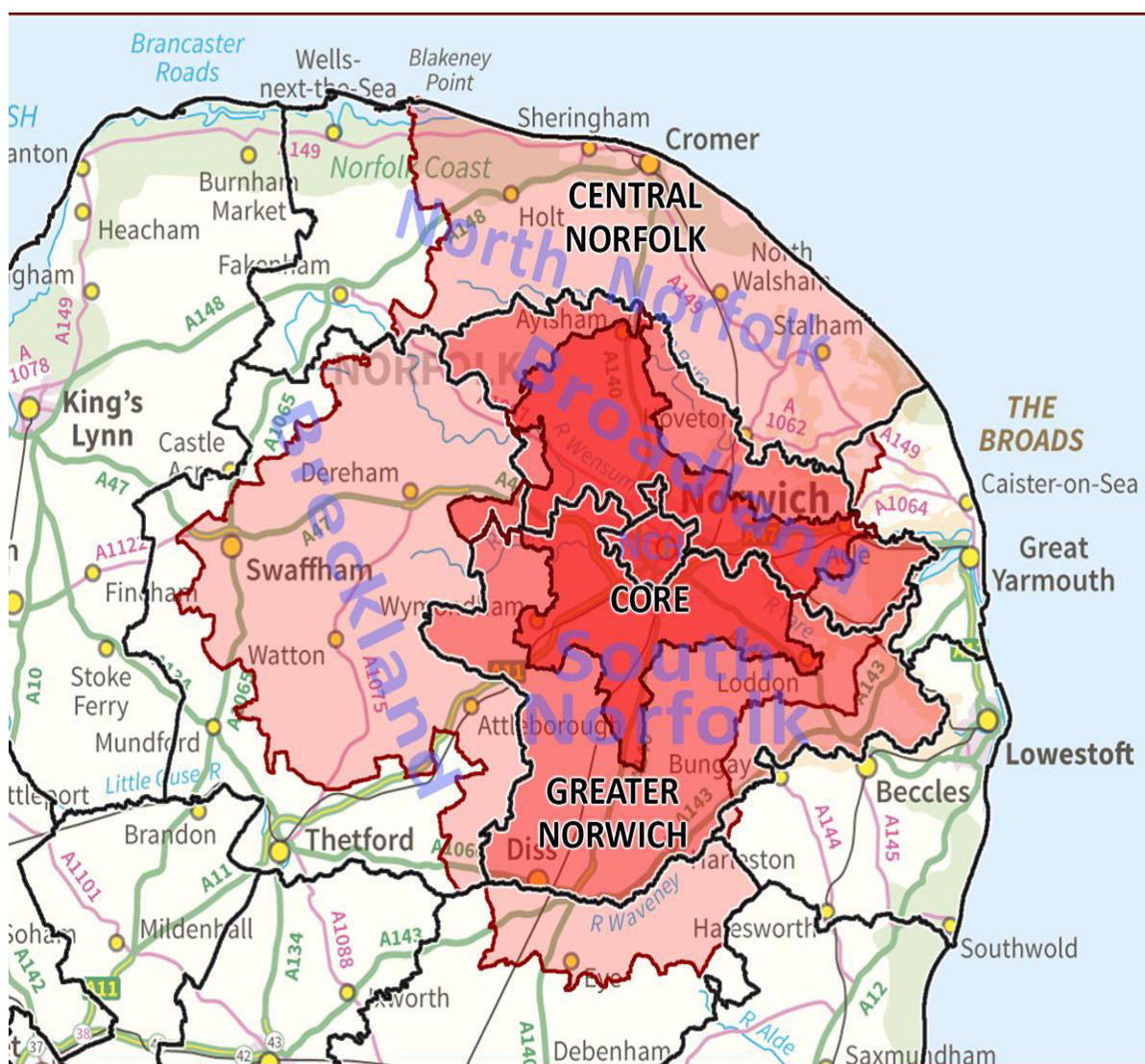


Figure 5 Central Norfolk Housing Market Area

4.3 The OAN for Greater Norwich established by the SHMA is 52,170 dwellings over the 24-year period 2012-36.

⁴ Market signals include property prices, rents, affordability, overcrowding and recent rates of development.

23. Is there any evidence that suggests that the defined housing market area, or the overall level of housing need in the Greater Norwich Area, is wrong?

Distribution of New Housing across Central Norfolk

4.4 As the Central Norfolk HMA is larger than Greater Norwich there is the potential to redistribute some housing numbers between Greater Norwich, North Norfolk and Breckland. Consideration could also be given to redistribution outside the Central Norfolk HMA e.g. between Central Norfolk, Great Yarmouth and Waveney. However, apart from a very small part of rural Breckland, the core market area identified in the SHMA is entirely within the Greater Norwich Area and in general linkages between the wider area and Norwich are weak. Any housing redistribution policy would require robust justifications and evidence and agreement from the relevant neighbouring authorities.

24. Is there any evidence that there should be any redistribution of some of the Breckland and/or North Norfolk need into the Greater Norwich area or vice versa?

25. Is there any evidence that there should be any redistribution of some of the need from Mid Suffolk, Waveney or Great Yarmouth into the Greater Norwich area or vice versa?

Affordable Housing

4.5 The GNLP will need to address the full OAN for affordable housing as well as for market housing. The SHMA indicates if the full OAN for affordable housing is to be met then 26% of all housing delivered across the Central Norwich HMA must be affordable housing. The Government has moved the emphasis to affordable home ownership rather than affordable rented homes⁵. However, there remains a need for affordable housing for rent. The SHMA indicates that to meet housing needs, 79% of all affordable housing in South Norfolk, 86% in Broadland and 90% in Norwich will need to be affordable housing for rent. *(Note: the SHMA figures on affordable housing need do not take account of the intended Government requirement for 20% of dwellings on all sites above a certain threshold to be delivered as Starter Homes. The SHMA may need to be updated to reflect the position when the Starter Homes situation becomes clearer).*

26. How can the GNLP address affordable housing need, including affordable housing for rent?

Specialist Housing

4.6 Changing health, longevity and aspirations of older people and current health and social care policy affects the need for specialist older people's housing. While new technologies and models of care will enable more elderly people to continue to live independently for longer, much greater levels of care and support will be necessary for some. As well as offering new specialist housing there is already an existing stock of older people's housing, including sheltered housing for rent offered by councils and

⁵ House of Commons Library, Housing and Planning Bill (Briefing Paper Number 07331)
<http://researchbriefings.files.parliament.uk/documents/CBP-7331/CBP-7331.pdf>

housing associations, housing with care, and nursing and residential care homes. The health and care sector will determine how existing buildings and services evolve, as well as what new provision is needed. There is also a role for private sector developers respond in meeting the demands for older people's specialist housing. The GNLP will engage with relevant bodies to address these issues.

27. How can the GNLP best help to meet the need for specialist housing for older people?

Provision for Gypsies and Travellers and Travelling Showpeople

4.7 Local planning authorities are responsible for assessing need and making provision for sufficient Gypsies and Travellers sites in their area⁶. This includes securing a five-year supply of deliverable sites. The most recent sub-regional work was done in 2012. The study found a need for 3 pitches in Broadland, 8 pitches in Norwich, and 37 in South Norfolk, plus 6 transit pitches across Greater Norwich over the years to 2026, although South Norfolk prepared a South Norfolk Gypsies & Travellers Accommodation Assessment in 2014, which identified a need for 35 additional pitches from 2014-2031. Furthermore, a need exists to provide more sites for Travelling Showpeople, due to the existing site in Norwich being at capacity. However, this need may be best met outside Greater Norwich because of Showpeople wanting to live more centrally in England for work purposes.

4.8 The three Greater Norwich councils plan to meet the needs for Gypsies and Travellers slightly differently. Broadland is meeting its demand through windfall planning permissions. Norwich has a policy in its Local Plan for meeting the needs of Gypsies, Travellers, and Travelling Showpeople. South Norfolk has begun work on a Local Plan for Gypsies and Travellers but has since paused in the wake of the national changes in policy.

4.9 There is likely to be a need for a mix of private and public Gypsies and Traveller sites across Greater Norwich, and also additional transit sites for temporary use.

28. How can the GNLP meet the needs of Gypsies and Travellers and Travelling Showpeople?

Building Enough New Homes

4.10 The NPPF is explicit in its requirement that Local Planning Authorities (LPAs) should ensure that their local plan meets the full OAN for housing⁷. Delivering insufficient housing poses a number of risks to the Greater Norwich area, including failing to deal with people's needs and reducing the area's economic potential. The national Local Plan Expert Group (LPEG) has recently recommended to Government that 20% over allocation above OAN requirements is necessary to help to ensure full needs are met.

⁶ Planning Policy for Traveller Sites, DCLG, March 2012

⁷ National Planning Policy Framework (NPPF), 2012, paragraph 47, pg. 12

4.11 LPAs must be able to demonstrate a five-year housing land supply. In the absence of an adequate supply of housing land, applications for housing should be granted unless “any adverse impact would significantly and demonstrably outweigh the benefits”⁸.

4.12 An inadequate land supply could therefore lead to additional, unallocated, sites being developed. Whilst this may help delivery in the short term there are also potential adverse effects. In particular it could undermine investor confidence in, or developer activity on, allocated sites. Not only may this undermine the plan-led approach to long term-sustainable planning, it is also likely that unallocated sites will not be as well related to existing or planned infrastructure as allocated sites by virtue of the fact that they do not form part of that plan-led approach.

29. Are there any reasons why the GNLP should not over allocate to help the delivery of houses?

30. Are there any other measures the GNLP could include to help ensure that sufficient housing is delivered in a timely manner?

Windfall Development

4.13 Windfall development, i.e. the development of non-allocated sites, has and will continue to occur across Greater Norwich during the GNLP plan period to 2036. Through the JCS the Greater Norwich authorities sought to allocate enough sites to meet identified housing requirements without relying on any contribution from windfall development that will occur after the allocation of sites.

31. How should windfall development be taken into account in the GNLP?

Public Concern about New Development

4.14 Proposals for new development can meet local resistance. Residents can have concerns about the quality of development and ensuring that the impact on infrastructure, local services and the environment is acceptable.

32. What can the GNLP do to address negative perceptions about development?

33. Are JCS policies 2, 3 & 6 on the quality of design and supporting infrastructure requirements still appropriate?

Design and Space Standards in new homes

4.15 There is evidence that Britain builds some of the smallest homes in Europe, and that some people are dissuaded from choosing new build properties because of cramped rooms and lack of adequate storage⁹. LPAs have discretion to prescribe internal space standards for new homes but this has to be evidenced. Likewise, on the accessibility standards for disabled people, the onus is on the LPA to justify a higher requirement than national standards. Norwich City Council has policies covering both these issues, in the latter case requiring that 10% of homes on schemes in the city should be built to higher Building Regulations standards for accessible and adaptable dwellings.

⁸ National Planning Policy Framework (NPPF), 2012, paragraph 14 pg. 4

⁹ RIBA, Improving Housing Quality: Unlocking the Market,
<https://www.architecture.com/Files/RIBAHoldings/PolicyAndInternationalRelations/Policy/Housing/ImprovingHousingQuality.pdf>

4.16 At present Policy 3 of the JCS sets design quality requirements for homes on larger schemes based on Building for Life requirements, which has now been superseded by BfL12.¹⁰

34. How can the GNLP increase the space standards in new homes and the design quality of new development without making the new homes financially unviable?

¹⁰ Joint Core Strategy, page 38

Section 5 – The Economy

Jobs needs

5.1 JCS Objective 3 is to promote economic growth and diversity, with a plan target of 27,000 additional jobs.

5.2 The Greater Norwich City Deal, which seeks to secure major new investment at the Norwich Research Park (NRP), Hethel Engineering Centre, Norwich city centre and Norwich International Airport, is intended to create more than 13,000 additional jobs above JCS targets. These additional jobs are intended to be delivered by growing high value sectors of R&D around health, agri-tech and environmental sciences; advanced manufacturing and engineering; and, digital creative.

5.3 Economic evidence to support the JCS was collected pre-recession and used to inform the allocation of land for employment development and the amount of office growth required. New evidence will be commissioned to support GNLP policy development.

5.4 The East of England Forecasting Model (<http://www.cambridgeshireinsight.org.uk/EEFM>) provides some recent evidence through its economic forecasts. The latest 2015-based projections were published recently. The EEFM baseline forecast can be considered as “business as usual”. The 2015 run suggests that:

- Growth in the JCS period (2008-2026) could be less than planned at around 22,000 jobs. This is largely due to the jobs decline in the period immediately after 2008 (between the low point in 2011 and 2026 forecast growth is around 30,000 jobs);
- Under “business as usual”, very little growth is forecast in the sectors targeted by the City Deal. Consequently, any growth that can be delivered in these sectors will be additional to baseline forecasts.

35. How can we achieve these levels of growth?

36. If they are not realistic, what might the alternatives be?

Norwich City Centre

5.5 Norwich city centre plays a fundamental and wide ranging role in the area’s economy, and its success is key to promoting inward investment into Greater Norwich as a whole. It is the largest location for employment, retailing and leisure uses in the region, as well as being a significant visitor attraction and a transport hub. It has the potential to expand and enhance these roles, with a number of brownfield sites available for development, and area wide regeneration opportunities.

5.6 The NPPF places a strong focus on protecting the vitality of town centres. The JCS identifies the city centre as the main focus for employment development to keep the city centre vibrant and successful, promoting expansion of the office, retail, cultural, tourism, leisure and education sectors. The considerable potential for growth of the digital creative sector is highlighted in the City Deal. The JCS also promotes housebuilding to support city centre vitality.

5.7 A rapid growth in the education, café, restaurant and bar sectors since 2008 has enhanced vitality. The city centre's retail sector remains one of the strongest nationally although the expansion promoted by the JCS has not taken place.

5.8 The vitality of the city centre has also been enhanced by significant residential development, including student accommodation. Housing led regeneration of the King Street area is progressing and there is potential for significant mixed use developments elsewhere in the centre.

5.9 In recent years there has been limited new office development and some allocated office sites are being proposed for other forms of development. Discussions with local market experts suggest that these trends may be due to:

- Current low rental values and the ready supply of budget accommodation limiting the prospect of large scale office building and favouring residential conversion, which no longer requires planning permission; and
- expansion in mobile working reducing the need for large scale office accommodation.

5.10 The possible development of a Norwich City Centre Strategy, produced in collaboration with businesses, has been identified. The aim of the strategy would be to help deliver the local plan, promote investment, access funding opportunities and promote development to further improve the attractiveness of the city centre as a place to shop, work, live and do business in.

37. How can the GNLP maintain and enhance the role of Norwich city centre and encourage new jobs, investment and development?
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Strategic Employment Locations

5.11 The NPPF requires local plans to set out a clear strategy identifying suitable sites and areas for business investment, responding to predicted changes in different market sectors and avoiding the long-term safeguarding of land for employment purposes which is unlikely to be required.

5.12 The JCS provides for large scale employment development in strategic locations within the Norwich Policy Area at Thorpe St Andrew, Longwater, Rackheath, Hethel, Norwich International Airport, Norwich Research Park (NRP) – which, as of April 2016, has Enterprise Zone status – and Wymondham, as well as smaller scale growth at Long Stratton (see figure 6 below).

5.13 More recently, Food Enterprise Zone status has been granted to the Greater Norwich Food Cluster in the Easton/NRP areas to the west of Norwich to promote the food, drink and agricultural sectors and associated research.

5.14 An A11 Technology Corridor initiative has been developed over the past 18 months. The project aims to create up to 10,000 new jobs and attract nearly £1bn of private investment by 2031. There will be a focus on developing at least 11 key employment areas along the route in South Norfolk, Breckland, Forest Heath and East Cambridgeshire, including development of a Technology Park at Hethel and the development of 20 hectares of allocated land at Browick Road, Wymondham.

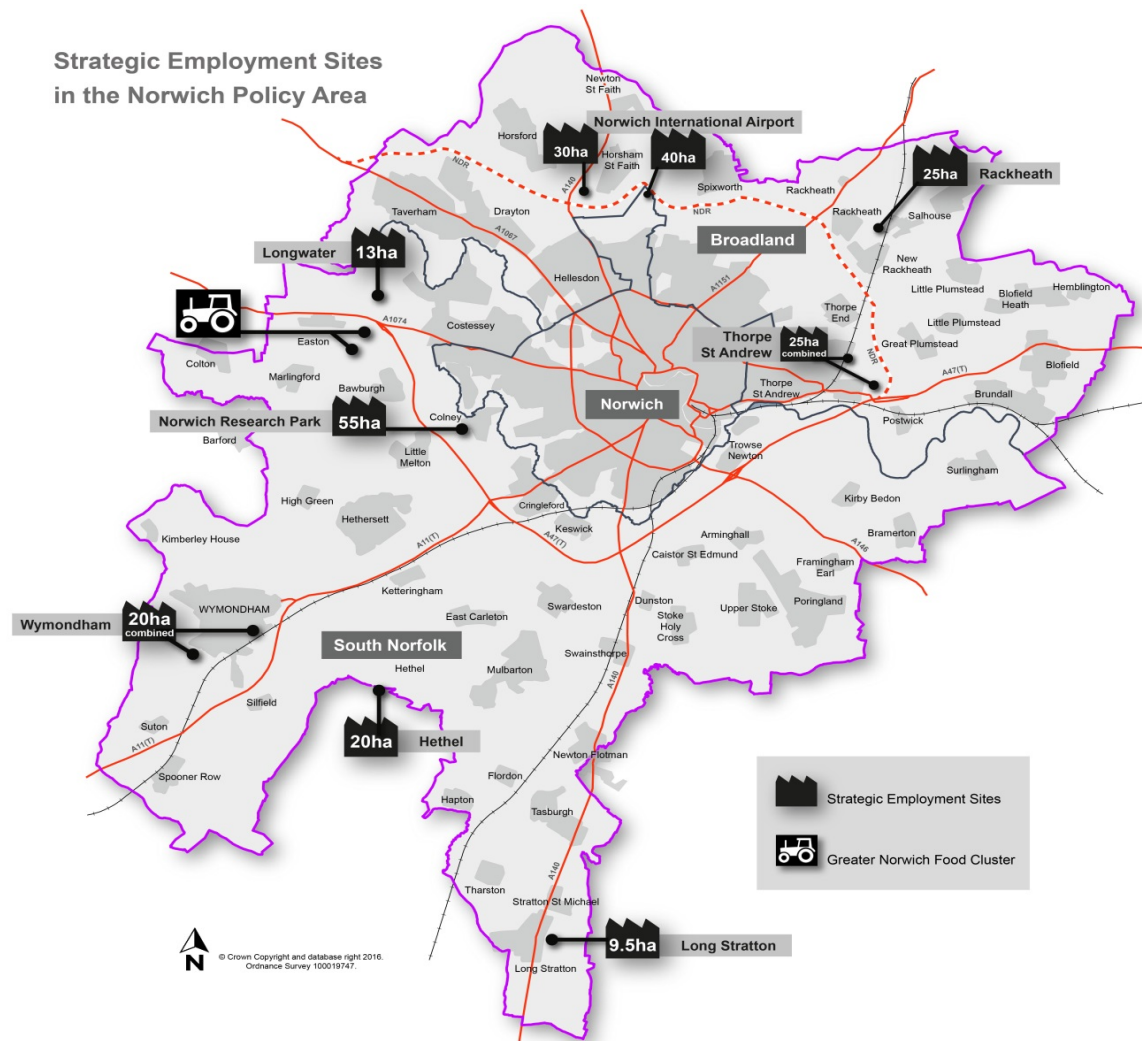


Figure 6 Strategic Employment Sites in the NPA

5.15 So far, development of these strategic sites has been limited. This is likely to be due to the recession; changing business needs; individual site constraints; the viability of speculative development; and the fact that many allocations have only recently been confirmed.

5.16 The GNLP will need effective policies catering for the needs of key sectors to support enterprise and innovation, in particular within those knowledge intensive industries targeted for significant job growth in the City Deal. Policies will need to encourage businesses to expand and change, and increase the attractiveness of the area for inward investment.

38. How and where can GNLP policies best meet employment land needs?

39. Should any existing or allocated employment sites be re-allocated for other purposes?

Towns, villages and rural areas

5.17 The JCS supports economic growth in market towns and revitalising the rural economy.

5.18 Policy 13 classifies Aylsham, Diss, Harleston and Wymondham as **Main Towns**. The first three are identified for modest growth in employment uses, whilst Wymondham, within the NPA and with good transport links, is identified for larger scale employment growth, including 20 hectares of new employment land.

5.19 Policy 14 identifies Acle, Blofield, Brundall Hethersett, Hingham, Loddon/Chedgrave, Long Stratton, Poringland/Framingham Earl, Reepham and Wroxham as **Key Service Centres**. Apart from Long Stratton, which is identified for more significant growth, the Key Service Centres are expected to accommodate limited growth, with existing shops and services protected and local employment opportunities promoted.

5.20 Norfolk County Council's Market Towns Report 2015¹¹ showed that most of the market towns in the area have experienced a fall in retail vacancies and are performing better than they have been for a number of years.

40. How can the GNLP best realise the economic potential of towns, villages and the rural areas?

41. What could the GNLP do to help protect and enhance town and village centres?

The Further and Higher Education sector

5.21 The JCS promotes development of education institutions in the area including the University of East Anglia (UEA), Norwich University of the Arts (NUA), City College and Easton & Otley College to offer educational opportunities and as a catalyst for economic growth in the area.

42. How can the GNLP help meet the future development plans and needs of Further and Higher educational establishments and maximise their contribution to the economy?

Links to employment clusters elsewhere

5.22 Significant employment growth is also anticipated in neighbouring districts. Most notably, growth of advanced manufacturing, engineering and agri-tech sectors is planned along the A11 corridor to Cambridge (see paragraph 5.14 above) and further development of off-shore renewable energy industry is anticipated in Great Yarmouth and Waveney.

43. How should the GNLP address opportunities for the Greater Norwich economy presented by economic growth in neighbouring areas?

Culture, tourism and the economy

5.23 The JCS promotes culture as a means of developing the economy, stimulating regeneration and promoting community involvement. This is to be implemented by maintaining and enhancing existing cultural assets and promoting the development of new or improved facilities. With the Broads, Norwich city centre, the market towns and the countryside providing a significant attraction for visitors, the strategy also promotes tourism as a growth sector.

44. Should the GNLP continue with the JCS approach of promoting culture and tourism as economic growth sectors?

¹¹ <https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/monitoring-land-use/market-towns-report-2015.pdf>

Section 6 – The Environment

Climate Change

6.1 Local Plans are required to contribute to the mitigation of, and adaptation to, climate change.

6.2 Mitigation measures could include: Reducing the need to travel and providing for sustainable transport (this is considered in sections 2 and 3 of this paper); providing for renewable and low carbon energy technologies; providing opportunities for decentralised energy and heating; and promoting low carbon design approached to reduce energy consumption. Adaptation could include the provision of Green Infrastructure, flood risk mitigation or water efficiency measures.

Renewable and Low Carbon Energy

6.3 The NPPF states that LPAs should “encourage the use of renewable resources (for example, by the development of renewable energy)” and “have a positive strategy to promote energy from renewable and low carbon sources”¹². It also states that LPAs should consider identifying suitable areas for renewable and low carbon energy sources in their plans, making the criteria used to identify these areas and the scale of development which is considered suitable clear. This would require an evidence study to be produced to identify such areas.

45. Should the GNLPP identify areas suitable for renewable energy development?

6.4 Policy 3 of the JCS requires larger housing developments to provide 10% of their energy from sustainable energy sources and to maximise opportunities for sustainable construction. While changes in government policy require energy efficiency and sustainable construction to be addressed through the national Building Regulations, it currently remains possible for LPAs to set local requirements for a percentage of energy to be produced from sustainable sources.

46. What should the GNLPP do to maximise decentralised energy and heating?

Ecology, Biodiversity, Geodiversity and Green Infrastructure

6.5 Over recent decades Norfolk has seen a significant decline in biodiversity resulting from habitat fragmentation caused by intensive agriculture alongside the development of housing and infrastructure. The key actions to address this issue are: protection of important wildlife sites; proper management of wildlife sites; and, the reconnection and restoration of habitats¹³. Monitoring information for the JCS does show, however, that since the base date of the JCS (2008), there has been a significant increase in the proportion of Sites of Special Scientific Interest in a favourable or recovering condition (from about 50% to about 85%).

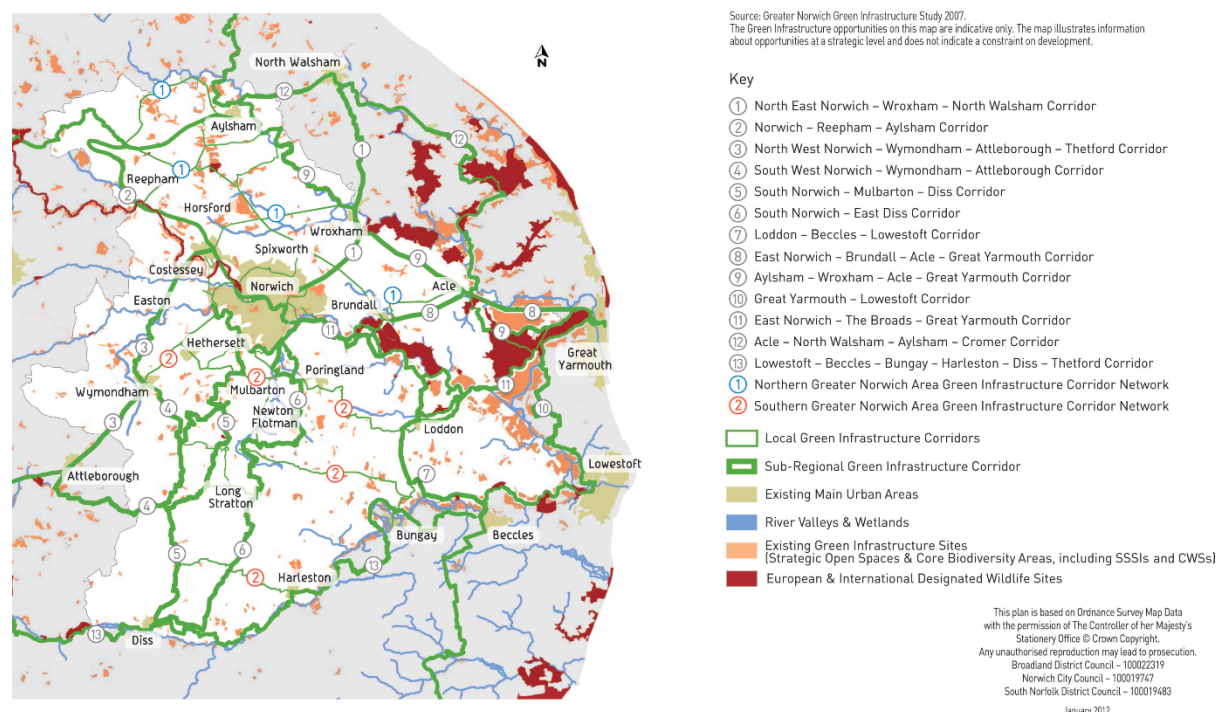
6.6 Policy 1 of the JCS seeks to protect the wealth of important wildlife sites in Greater Norwich. The reconnection of habitats is supported by the Green Infrastructure (GI) Strategy for Greater Norwich (see figure 7 below). Delivered through a combination of on-site developer contributions, planning obligations and conditions, and other funding, including Community Infrastructure Levy (CIL) funding, the GI strategy will improve connections between important wildlife sites through the protection and enhancement of a defined network of multifunctional green spaces. The GI strategy also performs an important role in climate change adaptation: providing cooling and shading in urban areas; helping to manage surface water by reducing the rate and volume of run-off; and providing a more vegetated and permeable landscape helping wildlife adapt to a changing climate.

¹² NPPF, paragraph 17, page 5 and paragraph 97, page 22.

¹³ Making Space for Wildlife and People: Creating an Ecological Network for Norfolk, Norfolk Biodiversity Partnership, 2005

6.7 Significant areas of new publically accessible green space provided as part of the GI Strategy, including the recently opened Harrisons Woodland, are expected to mitigate increased recreational pressure on protected habitats and species. Some stakeholders remain concerned, however, that there needs to be greater monitoring and management of protected sites, and mitigation plans in the event that detrimental impact is found to be occurring, to ensure effective protection.

Figure 7 The JCS proposed Green Infrastructure network for Greater Norwich



6.8 As well as biodiversity assets there are also geodiversity assets across Greater Norwich.

47. Will the GI Strategy adequately address growth pressures?

48. What should be done to protect geodiversity?

Minimising Flood Risk

6.9 The main sources of flood risk¹⁴ in the Greater Norwich area are identified as: flooding from the River Wensum in Norwich, the River Bure and Camping Beck at Buxton; combined river and tidal flooding in Wroxham/Hoveton and Brundall; failure or overwhelming of pumping stations causing localised flooding in Wymondham, Aylsham, and Upton; breaching/failure of embankments in Norwich; and surface water and sewer flooding in a range of places. By 2100 the largest increase in flood risk from rivers is predicted to be in Norwich.

6.10 In respect of other sources of flooding, such as surface water, ground water and ordinary water courses, no *nationally significant* indicative Flood Risk Areas have been identified in the Greater Norwich area by the Environment Agency. However, Norwich was identified as having approximately 14,000 people at risk of surface water flooding and was ranked 19th in a list of English settlements outside the indicative Flood Risk Areas¹⁵.

¹⁴ Broadland Rivers Catchment Flood Management Plan

¹⁵ Norfolk Preliminary Flood Risk Assessment, 2011

6.11 Potential measures to mitigate for and adapt to this risk are identified in the Norfolk Local Flood Risk Management Strategy. Such mitigation measures include retrofitting sustainable drainage (SuDS), flood defences, increased capacity and conveyance of drainage systems and improved land management practices¹⁶.

6.12 Policy 1 of the JCS requires development to “be located to minimise flood risk, mitigating any such risk through design and implementing sustainable drainage”. This policy is augmented by more detailed development management policies for each of the three Greater Norwich authorities which provide detail on how developers should address issues of flood risk within development proposals and planning applications. JCS monitoring shows that since 2011/12, there have been no instances in Greater Norwich of planning permissions being granted in an area of fluvial flood risk contrary to the Environment Agency’s advice.

6.13 In terms of evidence to support the GNLP, the Greater Norwich authorities continue to work with the lead local flood authority and the Environment Agency to identify where updating of the Strategic Flood Risk Assessment is necessary.

49. Does the existing strategy adequately manage flood risk and should this approach be carried forward?

Water Resources and Water Efficiency

6.14 Anglian Water’s Resource Management Planning predicts large water supply deficits in the Norwich and the Broads Resource Zone, which serves much of Greater Norwich. This is a result of the need to reduce the amount of water taken from the River Wensum¹⁷. To address this issue, £18.9 million of investment is planned between 2015 and 2020 on a scheme to relocate the abstraction point on the Wensum from Costessey to Heigham. Further investment of £5.5 million in metering and £1.3 million on water efficiency is also planned.

6.15 The Water Resource Management Plan also contains longer term proposals for the Norwich and the Broads Water Resource Zone to reduce leakage and investigate alternative sources of water supply from 2035/40, which may include water re-use, involving treating waste water to a high standard before pumping it upstream to support further abstraction from the River Wensum.

6.16 To complement efforts by Anglian Water to reduce water use in the existing housing, JCS policy 3 requires new development to be as water efficient as nationally set housing standards allow¹⁸ and restricts the release of land for development unless sufficient water supply infrastructure exists.

50. Is the existing JCS policy for water efficiency appropriate?

Water Quality and Waste Water Disposal

6.17 The European Water Framework Directive seeks to reverse deterioration of water quality and to improve environmental standards.¹⁹ The aim is for each inland and coastal water area to achieve at least Good Ecological Status over a range of different timescales between 2015 and 2027.

6.18 Water abstraction, waste water disposal and run-off from agricultural processes all impact on water quality, including that within the Broads. In terms of disposal, there are fourteen Wastewater Treatment Works in Greater Norwich. Significant parts of Greater Norwich are served by the Whitlingham

¹⁶ <http://norfolkcc.cmis.uk.com/norfolkcc/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/401/Committee/18/Default.aspx>

¹⁷ Joint Nature Conservation Committee, River Wensum, <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0012647>

¹⁸ GNGB, Water Efficiency Advice Note <http://www.greaternorwichgrowth.org.uk/document-search/>

¹⁹ The EU Water Framework Directive - Integrated River Basin Management for Europe http://ec.europa.eu/environment/water/water-framework/index_en.html

works, to the east of Norwich, which discharges water into the tidal River Yare. Other treatment works, with the rivers they discharge into, are at:

- Acle-Damgate, Aylsham, Belaugh (River Bure);
- Rackheath (Dobbs Beck, a tributary of the Bure);
- Diss and Harleston (River Waveney);
- Long Stratton (Hempnall Beck);
- Sisland and Poringland (River Chet);
- Reepham (Blackwater Drain, a tributary of the Wensum);
- Stoke Holy Cross (River Tas);
- Swardston Common (Intwood Stream, a tributary of the Yare); and
- Wymondham (River Tiffey).²⁰

6.19 Capacity for the treatment of waste water varies across the area. In some locations there is ample capacity relative to current demand and coping with increased demand from new development is less of an issue. In other locations, such as Long Stratton, demand and capacity are much closer.

6.20 Policy 3 of the JCS states that “the release of land for development will be dependent on there being sufficient water infrastructure to ... ensure water quality is protected or improved, with no significant detriment to area of environmental importance”.

51. Are the existing policies of the JCS adequate to protect water quality?

52. Are there any locations where growth is restricted by the capacity of the waste water treatment works?

Air Quality, Noise and Light

6.21 Local authorities are responsible for declaring places where air quality falls below target levels. In 2012 Norwich City Council declared an AQMA for the whole of central Norwich within the Inner Ring Road. This holistic approach to reducing pollution levels has been effective in bringing nitrogen dioxide levels down. Efforts continue to divert non-essential traffic from the city centre, provide more bus lanes, add cycle routes, and monitor the use of the Park & Ride facilities²¹. Outside central Norwich there are no Air Quality Management Areas. There is an AQMA in Hoveton, which is just outside the boundary of the study area. Hoveton (in North Norfolk) and Wroxham (in Broadland) are separated by the River Bure. Therefore, development in Wroxham may impact on the air quality of Hoveton, and the air quality in Hoveton may impact on the residents of Wroxham.

6.22 Local Plans can set specific noise standards for new development, but these should not become “fixed thresholds”²² and should be weighed together against other economic, social and environmental considerations. Mechanisms to minimise noise impact include building design and layout choices, controlling the times of day noise is emitted or installing mechanical ventilation systems in affected homes.

6.23 Known sources of noise disturbance in Greater Norwich relate to the operation of Norwich Airport and road traffic, especially on trunk roads. The Northern Distributor Road (NDR) will also be a source of noise disturbance. On a more localised scale some industrial activities can also generate noise issues. Noise is also an ecological concern as some species can be susceptible to noise disturbance.

²⁰ Greater Norwich Development Partnership
Stage 2b Water Cycle Study, 2010 <http://www.greaternorwichgrowth.org.uk/>

²¹ Norwich City Council, Air quality monitoring reports and assessments
https://www.norwich.gov.uk/downloads/file/3020/2015_air_quality_action_plan

²² Planning Practice Guidance, Reference ID: 30-010-20140306

6.24 Light pollution can affect people, wildlife and the tranquillity of naturally dark landscapes.

53. How can the GNLP help to improve air quality and reduce noise pollution?

54. What should the GNLP do to prevent increases in light pollution?

Agricultural Land and Soil Protection

6.25 Agricultural land and soil is a finite natural resource and farming is a major industry locally. National planning policy seeks to protect the best and most versatile grade 1 (excellent), grade 2 (very good) and grade 3a (good) agricultural land from development²³. The largest concentrations of grades 1 and 2 land in Greater Norwich are in the east of the area between Thorpe St. Andrew and Acle. Where development is necessary on green field sites, the preference should be to build on the lower grades: grade 3b (moderate), grade 4 (poor), and grade 5 (very poor), before using sites of higher grade.

55. How should the GNLP minimise impact on high quality agricultural land?

Heritage, Landscape Value and Amenity

6.26 The landscape of Greater Norwich is predominantly rural with large areas of low lying arable land, smaller occurrences of pasture farmland and numerous woodlands and plantations.

6.27 Particular sensitivities within the Greater Norwich Landscape include preserving the setting and integrity of areas of historic parkland²⁴, protecting the landscape of the Yare valley²⁵ and maintaining separation between distinct settlements.

56. What parts of the Greater Norwich landscape do you consider to be of particular heritage, landscape or amenity value and how can the GNLP best preserve and enhance areas?

²³ Agricultural Land Classification: protecting the best and most versatile agricultural land (TIN049)

<http://publications.naturalengland.org.uk/publication/35012>

²⁴ Broadland Landscape Character Assessment SPD, paragraph 1.2.2, page 1 http://www.broadland.gov.uk/housing_and_planning/618.asp

²⁵ South Norfolk Local Landscape Designations Review 2012 http://www.south-norfolk.gov.uk/planning/media/11115101R_Final_DW_06-12.pdf