

Report to Sustainable development panel
22 July 2020
Report of Director of place
Subject Greater Norwich Local Plan update

Item

4

Purpose

To update members on responses to the recent Greater Norwich Local Plan (GNLP) consultation, and on the decision of the Greater Norwich Development Partnership to revise the GNLP timetable.

Recommendation

To note the level and nature of responses to the recent GNLP consultation, the revised timetable, and likely changes to the planning system which may impact on the plan.

Corporate and service priorities

The report helps to meet the corporate priorities: great neighbourhoods, housing and environment; inclusive economy; and people living well.

Financial implications

There are no direct financial implications arising from this report. The council's contribution towards the cost of producing the plan is expected to be met from existing budgets.

Ward/s: All Wards

Cabinet member: Councillor Stonard - Sustainable and inclusive growth

Contact officers

Graham Nelson, Director of place 01603 212530

Judith Davison, Planning policy team leader 01603 212529

Background documents

None

Report

Introduction

1. The purpose of this report is to update members on reports considered at the recent meeting of the Greater Norwich Development Partnership (GNDP) in relation to the Greater Norwich Local Plan (GNLP). The GNDP is an informal, non-decision-making partnership of the city, South Norfolk and Broadland councils, the county council and the Broads Authority, and oversees the preparation of the GNLP.

Background

2. The draft GNLP comprises:
 - (a) a strategy document which contains the planning strategy for growth in Greater Norwich from 2019 to 2036, including thematic policies, and
 - (b) a site allocations document containing sites proposed to be allocated for development to help implement the growth strategy, containing site specific policies for all sites other than the village clusters in South Norfolk. (A separate allocations plan is being developed by South Norfolk council for these village cluster sites, which will come forward in due course.)
3. Once adopted the GNLP will supersede the Joint Core Strategy for Broadland, Norwich and South Norfolk, and the site allocations plans for the Norwich and Broadland and part of South Norfolk District.
4. The GNLP has been in preparation since 2016 and has undergone several stages of consultation. A full draft (Regulation 18) plan was discussed at sustainable development panel and subsequently approved for consultation by cabinet, both meetings taking place on 15 January 2020. (The cabinet report is available [here](#) (link to council's website, cabinet 15 January 2020). Following endorsement by the other two local planning authorities, the plan was published for consultation from 29 January until 16 March 2020. However, in approving the document for consultation cabinet noted that a number of aspects of the plan should be improved prior to submission of the plan. In summary these aspects were:
 - (a) Inadequate overall scale of growth proposed and overall ambition for growth in the light of the Greater Norwich City Deal;
 - (b) Too great a proportion of development being proposed in village locations which is hard to reconcile with climate change objectives;
 - (c) The rationale for a separate village clusters plan in South Norfolk being weak;
 - (d) Policy for strategic infrastructure considered to be insufficiently ambitious in supporting the transition to a low carbon future by achieving significant modal shift; and

- (e) The lack of ambition on transport issues and the focus on significant development in rural villages is inconsistent with the statements within the plan on addressing climate change.
5. The GNDP Board papers for the 10 July are available online (<https://www.greaternorwichgrowth.org.uk/planning/greater-norwich-local-plan/gndp-board/#NextMeeting2>) and comprise three separate papers, which are discussed briefly below.
- (a) A report providing feedback and initial analysis of the recent public consultation: the board noted this report as per the recommendation;
- (b) A report proposing a delay to the GNLP timetable: the board endorsed the timetable for progressing the GNLP and noted that districts will need to update their Local Development Schemes accordingly; and
- (c) A report noting emerging planning issues that may impact on the emerging GNLP: the board noted this report as per the recommendation.

Report 1: GNLP public consultation

6. The Regulation 18 consultation took place between 29 January and 16 March and therefore was completed prior to entering lockdown. This had the advantage of ensuring that the consultation could be completed without any of the consultation events being impacted but clearly has meant that none of the consultation responses address the impact of whether any of the emerging policies should be changed in the light of the impacts of Covid-19. Over 1,150 people attended the 14 consultation events. There was a good overall level of response to the consultation which is summarised in the table below:

	No. of respondents	Total reps	Method			Support	Object	Comment
			Web	Email	Paper			
Strategy	242	1566	568	983	12	356	427	783
Sites	753	1761	1186	526	46	538	777	446
Evidence	7	12	1	11	0	0	3	9
Totals	N/A¹	3339	1755	1520	58	894	1207	1238

7. Table 3 in Report 1 summarises the most significant issues raised through the consultation and provides an initial response to each by the GNLP team (see pages 16-23 of the GNDP report). A considerable number of representations

¹ Note that a response is counted as one submission in the online consultation system. A submission can then have a number of representations that sit within it. Therefore, no total figure has been given for respondents because some respondents will have been counted twice as they will have responded to both strategy and sites documents in the same submission. If an agent made more than one response, i.e., they were responding on behalf of multiple clients, they will be recorded multiple times as respondents in the online consultation system.

made overlap with concerns raised by the city council. For example, these include comments on the climate change statement, including noting some scepticism as to whether the GNLP will achieve its stated aims and/or whether these go far enough. Some representations also express concern at the growth strategy and in particular overall housing numbers: a number of representations from the development industry state that the GNLP housing numbers should be raised to take account of the City Deal, provide a larger buffer, and correct errors in the interpretation of the standard methodology; whilst other representations considered the housing numbers to be too high.

8. Other significant issues noted in Table 3 include the call in some representations for a stronger focus on modal shift in transport policies, and concerns over the separation of the South Norfolk Village Clusters from the plan. In addition, the table notes representations from Historic England which contend that the plan does not provide a sound planning framework for Norwich city centre with potential implications for the historic environment.
9. The table notes that a number of representations identify what those commenting consider to be potential soundness issues, for example in relation to housing numbers, the location of growth, and the Village Clusters plan for South Norfolk.
10. In relation to housing numbers, it is relevant to note that the city council is leading on the procurement and project management of a new Housing Needs Assessment to provide up-to-date evidence on housing need and supersede the 2017 Central Norfolk Strategic Housing Market Assessment update. This study is being carried out for all Norfolk authorities, apart from Kings Lynn and West Norfolk which has a recently produced SHMA. Once finalised, the Central and East Norfolk Housing Needs Assessment ('the HNA') will inform local plan preparation processes across Norfolk, including the GNLP, and ensure that the relevant local authorities understand and can plan soundly for their housing need. In addition to informing the housing requirement figure in local plans it will identify the size, type and tenure of housing needed for different groups in the community, including those who require affordable housing, families with children, older people, students, and people with disabilities (not an exhaustive list). This important evidence study is likely to commence in autumn 2020 and be completed in early 2021. Its progress will be dependent on the publication of a new standard methodology for assessing housing need, which was expected to be published by Government in June but is now anticipated in autumn. Planning practice guidance makes clear that the housing target produced through application of the standard method will be a starting point for identifying housing targets in local plans and that a number of matters need to be taken into consideration such as growth strategies in place to promote and facilitate additional growth (such as the Greater Norwich City Deal), consideration of previous levels of housing delivery, changes to government policy, and changing economic circumstances. It is also relevant to note that recently published 2018 household growth projections for Greater Norwich are significantly higher than the 2014 projections (the current standard methodology is based on the latter). This strongly suggests that the GNLP housing target based on the new methodology using the latest projections is likely to be higher than previously.

11. The vast majority of representations on sites (summarised in tabular form in pages 40-58 of the report) were concerning those proposed outside of the city's boundaries, although some moderate level of objection was received to the proposed allocation for the expansion of UEA. No new sites have been proposed in Norwich through the consultation.
12. The report notes that in progressing towards the pre-submission (Regulation 19) version of the plan and then submission of the plan to the Secretary of State, officers will consider the Regulation 18 consultation comments through a number of topic papers, to provide advice for members on how draft policies should be amended in the next version of the plan. The topic papers will then be adapted and submitted with the plan to the Secretary of State. They will justify the plan approach by providing further detail than will be in the concise plan itself. A consultation report covering all stages of consultation will be submitted to the Secretary of State alongside the GNLP.

Report 2: GNLP revised timetable

13. Report 2 sets out a revised timetable for the remaining stages of the GNLP. The report explains that this is required to address the large volume of representations made and to ensure that proper consideration is given to the issues raised, and also to reflect revised circumstances in the light of the Covid-19 pandemic. Furthermore it states that in order to ensure that the evidence base is as robust as possible and to have regard to new Government planning policy, it is considered necessary for the GNLP to agree the content of the Regulation 19 draft plan following elections in May 2021 instead of November 2020. This will also enable the GNLP team to overcome some of the practical impacts of Covid-19 on the team's workstreams.
14. The Covid-19 pandemic has implications for the robustness of the GNLP evidence base. The report notes the importance of updating evidence in a number of areas including housing and delivery issues, viability and CIL evidence, and the Housing Needs Assessment referred to above. In addition the East Norwich masterplan, which was recently given the go-ahead by cabinet and the procurement of which is now underway, will also be an important part of the evidence base for the Regulation 19 plan and will help inform the east Norwich site allocation policies.
15. The table below sets out the difference between current and revised timetables. The revised timetable enables further focused consultation to take place on possible changes to the plan and is considered advantageous in reducing risks to soundness and allowing improvements to the plan. In particular this will allow the GNLP to reflect on progress made in relation to the Norwich Western Link and to consult on the possibility of including a specific allocation for the use of land for it within the plan (see para 2.3 of the report).
16. Some aspects of the proposed timetable are outside the control of the GNLP team and GNLP. For example, the period from submission to examination will be dependent on the Planning Inspectorate, and the dates of the proposed consultation on the main modifications will depend on the outcome of the examination. The revised timetable is as follows:

Production timetable	Current timetable	Revised timetable
Regulation 18 consultation ends	16/03/20	16/03/20
GNDP board meeting (public)		10 July
Focussed Reg. 18 consultation		2/11 – 14/12/20
Pre-election period/elections		End March – early May 2021
Reg. 19 Plan to be endorsed by GNDP (public)	19/11/20	Late June 2021
Cabinets agree Reg. 19 plan	18/12/20	Late July 2021
Reg. 19 consultation on soundness and legal compliance	Jan/March 21	August / September 21
Submission of GNLP to the Secretary of State	June 21	Oct/Nov 21
Public Examination	Nov/Dec 21	Feb/Mar 22
Adoption of the Greater Norwich Local Plan	Aug/Sept 22	Nov/Dec 22

17. The new timetable means that all Greater Norwich Authorities will need to update their Local Development Schemes (LDSs). The city council's LDS was due to be discussed at sustainable development panel in March. This meeting was cancelled due the start of the Covid-19 pandemic, but members were consulted on the report by email. The LDS was subsequently approved by cabinet in June. It will now need to be updated to take account of the revised timetable, likely in autumn 2020.
18. Another implication for the city council relates to the proposed review of Norwich's Development Management Policies Plan (DMPP). This was discussed at sustainable development panel and cabinet in November 2019 in relation to the Regulation 10A review of the local plan, which noted that the review of the DMPP would commence following the Regulation 19 consultation when the GNLP's policy content would be clearer. It is now likely that this review will commence in mid-2021 at earliest.

Report 3: Assessment of emerging government policy and impacts

19. The third report looks at two key elements of emerging government policy for local plans, Planning for the Future and the Environment Bill, along with a

potentially significant Department for Transport document, Decarbonising Transport. All are likely to have some impacts on the GNLP. The report also notes the intention to incorporate new national policy, where possible, into the emerging GNLP.

20. Table 1 in the report analyses the potential implications of Planning for the Future on the GNLP. The report concludes that the draft GNLP is sufficiently flexible to provide a good basis to respond to change.
21. In terms of the Environment Bill (the progress of which has been delayed due to current circumstance) , the report notes that the draft plan clearly references the intention to make biodiversity net gain a mandatory requirement at Regulation 19 stage once the Bill is enacted. There will however be a need to review relevant evidence studies, including for example assessment of what further work is required to produce the Greater Norwich Local Nature Recovery Strategy.