

# Greater Norwich Local Plan: Regulation 18 Consultation

## General Response Form

Thank you for responding to the Regulation 18 consultation on the emerging Greater Norwich Local Plan. If you have any questions relating to the consultation please contact the Greater Norwich Local Plan team on 01603 306603 or email [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

It is easier to respond online at [www.gnlp.org.uk](http://www.gnlp.org.uk) . If you cannot do this, please use this form to respond to the:

- Growth Options document – there are 66 questions covering the Vision and Objectives, Strategy and Topic Policies. There is no need to answer all the questions – just respond to those you are interested in;
- Site Proposals document for commenting on submitted sites and development boundaries (you'll need the Site Submission form to submit additional sites);
- Interim Sustainability Appraisal;
- Evidence Base.

All documents are available from [www.gnlp.org.uk](http://www.gnlp.org.uk)

Hard copies of the documents are available at consultation "Deposit Points" at:

- County Hall, Martineau Lane, Norwich (main reception);
- City Hall, St Peters Street, Norwich (2<sup>nd</sup> floor reception);
- Broadland District Council, Thorpe Road, Thorpe St Andrew (main reception);
- South Norfolk Council, Cygnet Court, Long Stratton (main reception).

### Submitting your Response Form

Responses should be made electronically on the webform which is available at [www.gnlp.org.uk](http://www.gnlp.org.uk) . Alternatively this response form can be downloaded and submitted by email to [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

Completed hard copy forms can also be sent to:

*Greater Norwich Local Plan Team*  
PO Box 3466  
Norwich  
NR7 7NX

All submissions should be made on or before **5pm on Thursday 15 March 2018**.

Please note that anonymous submissions cannot be accepted.

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**Please make your comments below. Please use a separate form if you are commenting on more than one document. Please clearly state the paragraph and page number your comments refer to.**

<b>Document (please tick as appropriate)</b>		
Growth Options consultation document	Site proposals consultation document	Interim Sustainability Appraisal
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Evidence Base	Caravans and Houseboats	<input type="checkbox"/>
	Employment, Town Centres and Retail Study	<input type="checkbox"/>
	Habitats Regulation Assessment (HRA)	<input type="checkbox"/>

Evidence Base	New Settlements Topic Paper	<input type="checkbox"/>
	Strategic Flood Risk Assessment (SFRA) <sup>1</sup>	<input type="checkbox"/>
	Strategic Housing Market Assessment (SHMA)	<input type="checkbox"/>
	Viability Study	<input type="checkbox"/>
	Housing and Economic Land Availability Assessment (HELAA)	Please respond to the Site Proposals document quoting the site reference number if you have comments to make on individual site summaries or on the HELAA process

**Comments (please clearly state the paragraph and page number your comments refer to). You can respond to as many questions as you wish below, but if you are responding to more than one document, please submit a separate form for each document.**

**Q2 Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in Paragraphs 4.1 to 4.7?**

We largely support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1 to 4.7 with the following suggestions of necessary focus. The strategy recognises the need to align delivery of jobs, homes and infrastructure and make the most of opportunities for economic and housing growth made available by recent infrastructure improvements and existing strengths of the Norwich area.

We particularly support in paragraph 4.2 the specific drive for economic growth in proven sectors already active in the Norwich area. These include those aviation related industries concentrated around Norwich Airport. Although the delivery of some of the existing allocations around the airport have been delayed, the completion of the new strategic infrastructure project of the Norwich Northern Distributor Road (NNDR) is likely to give the area and its contribution to economic and housing growth a necessary boost. In cases close to the strategic employment locations it is worth considering the opportunities which might be afforded to smaller and medium sized businesses to locate in close sustainable and symbiotic proximity to the principal destination and economic attractor.

Proposals for a comprehensive form of development on land located between Reepham Road and Cromer Road, Horsford and Hellesdon parished and immediately to the west of the Airport could accommodate such uses in a highly sustainable manner.

The aligned strategy of providing housing to support the economic growth opportunities of the area is welcomed together with its recognition that planned growth should be focussed in and around Norwich supporting the area's regional, national and international economic functions and in the suburbs and fringe parishes providing growing sustainable communities. Such an approach is in accordance with government advice contained in the National Planning Policy Framework (NPPF) for sustainable development.

<sup>1</sup> Please note that whilst a hard copy the main SFRA document is available at the Deposit Points, the remaining documents (maps etc.) are only available online – follow the links from [here](#)

We also support the strategy focus on delivery as a key to the success of the plan (paragraph 5.1). The plan must avoid the mistakes of the past where sites in inappropriate locations, often not sustainable and in areas which are not favoured by the market or supported by adequate infrastructure are allocated and other more appropriate and deliverable sites are rejected.

**Q3 Which option do you support for jobs growth?**

We support option JT1. As explained and justified in the Employment Land Assessment (ELA) it is unlikely that “business as usual” will be a true reflection of the future economy of Greater Norwich (paragraph 5.5 of ELA). The economy of the area displays exciting opportunities emanating from a number of high productivity tech industries such as those which have already developed a momentum at the NRP and Norwich Airport and those which have established a firm and respected local base. In addition, the recent improvements to strategic infrastructure have delivered much greater opportunities for expansions and access to wider markets.

**Q4 Do you agree that the OAN for 2017-2036 is around 39,000 homes?**

The plan should seek to provide for the full OAN with appropriate buffers applied to ensure a sustainable and regular delivery of homes. Although the provision of around 39,000 homes appears to be a reasonable minimum the OAN and methodology should be regularly and carefully monitored. Small changes in input data over time can have significant impacts on the levels of need. The NPPF (paragraph 158) urges Councils in preparing their local plans to ensure they use the most up to date and relevant evidence. We would urge the councils to ensure that the OAN is monitored closely and kept under review as the later stages of the local plan process progress.

**Q6 Do you agree that the windfall development should be in addition to the 7,200 homes?**

Yes, any windfall development should be in addition to the identified minimum 7,200 homes. Any windfall development which comes forward during the plan period will provide flexibility to enable enough additional growth to come forward to fully support the jobs growth sought through the City Deal and will assist in achieving the broad strategic approach referred to in paragraph 4.2 of promoting inclusive growth and social sustainability in village locations. Such an approach will also present opportunities for smaller house builders where larger developers would not achieve the larger returns on capital employed. We would though favour favour concentrating the delivery of windfall sites to those areas and villages within the Norwich Policy Area where the most sustainable

**Please add additional sheets if necessary** locations will exist (Q 26).

NOTE - Additional sheets attached at the end of this form.

**Disclaimer**

Data Protection and Freedom of Information

The Data Controller of this information under the Data Protection Act 1998 will be Norfolk County Council, which will hold the data on behalf of Broadland District Council, Norwich City Council and South Norfolk Council. The purposes of collecting this data are:

- to assist in the preparation of the Greater Norwich Local Plan
- to contact you, if necessary, regarding the answers given in your form

The response forms received as part of the Greater Norwich Local Plan Regulation 18 Consultation will be made available for public viewing. By submitting this form you are consenting to your comments being stored by Norfolk County Council, and the details being published for consultation purposes.

**Declaration**

I agree that the details within this form can be held by Norfolk County Council and that those details can be made available for public viewing and shared with Broadland District Council, Norwich City Council and South Norfolk Council for the purposes specified in the disclaimer above.

Name Mike Carpenter (Director)

Date 22/03/2018

## Greater Norwich Regulation 18 General Response Form

FOR OFFICIAL USE ONLY	
Response Number:	
Date Received:	

Your completed form should be returned to the Greater Norwich Local Plan team no later than **5pm on Thursday 15 March 2018**.

By email: [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

Or, if it is not possible submit the form electronically,

By post to:

*Greater Norwich Local Plan Team  
PO Box 3466  
Norwich  
NR7 7NX*

Further advice and guidance can be obtained by visiting the Greater Norwich Local Plan website or by contacting the Greater Norwich Local Plan team directly:

Website: [www.gnlp.org.uk](http://www.gnlp.org.uk)

E-mail: [gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

Telephone: 01603 306603

## Comments continued:

### **Q8 Is there any evidence that the existing housing commitment will not be delivered by 2036?**

We are severely concerned that policies designed to identify and direct housing allocations should be unambiguously content that the number of homes concentrated in single locations can be delivered within the plan period. Any doubts on this point are likely to put at risk the delivery of homes and the consequent achievement of the vision and objectives of the plan. The plan must be 'sound' and as such must be able to demonstrate its policies and allocations are effective and deliverable.

Our particular concern on this point is the over-reliance on the delivery of an unusually large number of homes within the Growth Triangle and adjacent fringe parish of Thorpe St Andrew in the North East Sector of the Norwich area. Existing commitments already amount to 12,976 (Fig 3 of Growth Options Document). All six growth options contain baseline allocations of a further 200 homes, with Growth Options 1, 2 and 6 suggesting the possibility of an additional 1200 homes. In this relatively small area of the north eastern fringe parishes there is therefore an assumption that the market could accommodate and sell an average annual delivery rate of between 732 and 788. Development is concentrated in the area on a relatively small number of large sites where a relatively small number of housebuilders will be competing for sites and sales. The most likely reaction of the market in such circumstances is likely to be to look to invest in less competitive and saturated locations.

### **Q9 Which alternative or alternatives do you favour?**

Having considered a wide range of complementary factors related to the achievement of the plan's vision and broad strategic approach we believe that each of the stated options have both strengths and weaknesses. However, none of them present an ideal option for growth. We suggest and justify in answer to Q 11 a favoured reasonable alternative. See response to Q 11.

### **Q 11 Are there any other strategic growth options that should be considered?**

The selected strategic growth option must be designed to provide the best opportunity to achieve the plan's vision and broad strategic approach as detailed on pages 17 and 19 of the Growth Options Document. The key elements to the success of the plan include identifying suitable sites in the most sustainable locations, closely related to existing and improved strategic infrastructure, aligned to the aims of economic growth and with the greatest likelihood of deliverability. The selection of locations for specified housing growth numbers is not supported by adequate evidence. The following concerns are relevant: There is a severe over-reliance on the delivery of an unusually large number of homes within the Growth Triangle and adjacent fringe parish of Thorpe St Andrew in the North East Sector of the Norwich area. Existing commitments already amount to 12,976 (Fig 3 of Growth Options Document). All six growth options contain baseline allocations of a further 200 homes, with Growth Options 1, 2 and 6 suggesting the possibility of an additional 1200 homes. In this relatively small area of the north eastern fringe parishes there is therefore an assumption that the market could accommodate and sell an average annual delivery rate of between 732 and 788. Development is concentrated in the area on a relatively small number of large sites where a relatively small number of housebuilders and house purchasers will be competing for sites and sales. The most likely reaction of the market in such circumstances is likely to be to look to invest in less competitive and saturated locations. In our view this assessment of market reality should lead to a substantial reduction in the targeted number of dwellings for this sector.

The majority of (3 of the 5) Main Towns (Harleston, Diss and Aylsham) are located outside of the Norwich Policy Area, where established policy has always ensured growth took place in the most sustainable locations close to Norwich. This remains a valid policy framework for the future (See Q22 and Q26). In our view, while those Main Towns outside of the NPA should be identified for some growth proportionate to their functions as sustainable communities for their immediate hinterlands they should not be seen as being sufficiently sustainable to accommodate the most sustainable and appropriate growth close to Norwich. In addition, the Main Town of Wymondham has accommodated substantial levels of growth over recent years and may need time to adapt and integrate the new communities before any further major allocations are made. The consequences of these points for the Growth Options is that the target numbers for the Main Towns should be maintained at the lower levels of suggested allocations. The reference to the parishes within the South West Sector should include Colney. The parish of Cringleford has had substantial growth over recent years and the adopted Neighbourhood Plan confirms that the majority of the previously undeveloped areas of the parish are already committed to development. In the meantime, Hethersett has also had substantial growth to its northern boundary moving development closer to Norwich and eroding the strategic gap. It is therefore difficult to see where within these two parishes further housing development could be accommodated. The parish of Little Melton lies to the south of the Norwich Southern bypass and further away from the strategic employment site of NRP. Development here would therefore be less sustainable than appropriately located development directly adjacent to the NRP and the existing community of Cringleford. The relative lack of site availability in this sector suggests the need to be careful in targeting large numbers of new homes to its parishes less able and appropriate to accommodate additional growth.

There is no objection to identifying Service and Other Villages or Village Groups for proportionate scales of development and indeed for the purposes of promoting inclusive growth and social sustainability and supporting a thriving rural economy, limited development should be encouraged. However, it remains important to ensure that any growth is proportionate and relevant to the function of the settlement and designed to support and encourage economic growth rather than divert development away from the more sustainable and deliverable locations in and next to Norwich.

## Comments continued:

The West Sector including the parishes of Bawburgh, Costessey and Easton has limited additional and suitable land for development beyond that which is already committed. Large areas of land directly adjacent to Costessey is situated in the flood plain and in areas of landscape value. The village of Easton has recently been the subject of planning permissions for substantial growth which will take time to assimilate into what is currently a relatively small community.

In view of the above concerns, while there will inevitably be a mix of dwelling numbers to be targeted towards various sectors, Main Towns, Key Service Centres and Other Villages it is important to ensure that homes are targeted to those areas most sustainable, deliverable and supportive of economic growth (all key drivers in achieving the vision and strategic approach of the plan). In view of the above assessment, an alternative growth option is suggested which targets a higher number of homes to North/North West Sector, includes the parish of Colney in the South West Sector, encourages appropriate numbers in other areas and reduces numbers in those areas which are less sustainable, have insufficient land or cannot be sure of an ability to deliver high numbers of homes in the plan period.

### **Q 13 Do you support the establishment of a Green Belt?**

We do not support the establishment of a Green Belt. There is no evidence to meet the requirements of the NPPF to demonstrate exceptional circumstances. Paragraph 82 of the NPPF is clear that new Green Belts should only be established in exceptional circumstances. Although the NPPF refers to an example where a council may be planning for larger scale developments such as new settlements or major urban extensions this feature alone is insufficient to meet the other criteria for assessing exceptional circumstances.

“Demonstrate why normal planning and development management policies would not be adequate;”

Whether any major changes in circumstances have made the adoption of this exceptional measure necessary;”

Show what consequences of the proposal would be for sustainable development;

Demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas: and

Show how the Green Belt would meet the other objectives of the Framework.”

### **Q22 Do you know of any specific issues and supporting evidence that will influence further growth in the Main Towns?**

The majority of (3 of the 5) Main Towns (Harleston, Diss and Aysham) are located outside of the Norwich Policy Area, where established policy has always ensured growth took place in the most sustainable locations close to Norwich.

This remains a valid policy framework for the future (See Q11 and Q26). In our view, while those Main Towns outside of the NPA should be identified for some growth proportionate to their functions as sustainable communities for their immediate hinterlands they should not be seen as being sufficiently sustainable to accommodate the most sustainable and appropriate growth close to Norwich. In addition, the Main Town of Wymondham has accommodated substantial levels of growth over recent years and may need time to adapt and integrate the new communities before any further major allocations are made. The consequences of these points for the Growth Options is that the target numbers for the Main Towns should be maintained at the lower levels of suggested allocations.

### **Q 23 Do you agree with the approach to the top three tiers of the hierarchy?**

We agree that the top three tiers should be the focus of development subject to comments made to Q 11. However, for the sake of clarity the reference to “the built up parts of the fringe parishes” should be removed in Tier 1 because in order to meet the growth opportunities and the OAN it will be necessary to develop land outside but adjacent to the built up parts of specific parishes. Also for clarity the parish of Horsford should be added to the list of fringe parishes in Tier 1. Horsford is a key parish in the North/North West Sector as recognised in Fig 3. The parish has sustainable built form in the shape of Horsford village located close to Norwich, the NNDR strategic infrastructure, close to the strategic employment sites around Norwich Airport and a boundary contiguous with the built up area of Hellesdon.

### **Q 26 Do you support a Norwich centred policy area and, if so, why and on what boundaries?**

Yes. The existing boundaries of the Norwich Policy Area (NPA) should be maintained as a focussed tool for targeted sustainable growth to assist in achieving the vision and strategic approach to economic growth in the plan. The policy approach has served Norwich and Norfolk well over many years and has helped Norwich achieve and then maintain an established reputation for sustainable growth and economic excellence in sectors such as bio-medical and life science research. The maintenance of this approach combining sustainable and accessible, often co-located employment and housing will continue to give Norwich a Unique Selling Point (USP) to compete in a market place which in some areas has become ‘over-heated’, eg Cambridge.

We support the sentiment of paragraph 4.161 of the Growth Options Document.

“4.161 The NPA plays a role in promoting the economic strength of Norwich and its surrounding area, demonstrating the collective importance of the area and showing the scale of housing and jobs growth with a focus on Norwich. It is also the same as the NATS area used for transport planning.”

Paragraph 4.162 comments that “a number of ongoing changes in the area may affect consideration of whether there is a future role for the NPA.” In fact, the changes positively affect the suitability of sites within the NPA such as being adjacent to the new strategic infrastructure of the Norwich Northern Distributor Road (NNDR) or in the south being in close proximity to a now designated Enterprise Zone of the NRP. These changes only strengthen the justification for maintaining the NPA policy framework.

## Comments continued:

### **Q 36 Which approach do you support for promoting good design of new development?**

We support Option DE1. It is essential that planning policy is not so prescriptive it removes the flexibility and design opportunities for developers, architects, urban designers, landscape architects and development management teams to address innovative specific site related design issues.

The GNLP is not the appropriate process or plan in which to introduce design and development management policies. According to paragraph 1.25 of the Growth Options document, the GNLP will not amend existing adopted Development Management policies.

### **Q 38 Which approach do you favour for affordable housing percentages?**

The only option which is supported by evidence is Option AH3.

### **Q 41 Which approach to the mix of housing do you support?**

We strongly favour Option AH10. Any evidence gathered on housing mix, particularly in respect of market housing mix can only be a 'snap shot' in time based on a wide and generic consideration of influencing factors. It fails to take into account often large swings in housing mix requirements brought about by economic conditions and site specific issues such as surrounding uses, landscape integration, need for inclusive communities, viability, affordability and access.

### **Q 44 Which policy approach do you favour to planning for the needs of Gypsies and Travellers?**

We strongly favour Option GT1 which would give the planning authorities, applicants and existing communities the opportunity to consider the detailed and very site specific nature of such proposals.

### **Q 53 – Which option do you support? [Nature Conservation and Green Infrastructure]**

The GNLP is not the appropriate process or plan in which to introduce changes to the approach to protecting designated sites. Policies for the provision of additional GI space are contained in the Development Management policies Local Plan According to paragraph 1.25 of the Growth Options document, the GNLP will not amend existing adopted Development Management policies. These are currently largely contained in policies EN2 and EN3. If these policies are to be changed in the GNLP process there would need to be much greater transparency and a whole new level of evidence gathering.

### **Q 54 Do you think any changes should be made to the Green Infrastructure network?**

The GNLP is not the appropriate process or plan in which to introduce changes to the approach to protecting designated sites. Policies for the provision of additional GI space are contained in the Development Management policies Local Plan According to paragraph 1.25 of the Growth Options document, the GNLP will not amend existing adopted Development Management policies. These are currently largely contained in policies EN2 and EN3. If these policies are to be changed in the GNLP process there would need to be much greater transparency and a whole new level of evidence gathering.

The extent of the Green Infrastructure network is also, in some cases shown in Area Action Plans, including in the Growth Triangle AAP. According to paragraph 1.26 the future role of the adopted AAPs for Long Stratton, Wymondham and the North East Growth Triangle and Neighbourhood Plans will be considered in plan making. If there is a possibility that the GNLP will seek to change the Green Infrastructure network this should be made clear now and consulted upon properly. Designation and delivery of GI sites affects individual landownerships and communities and it would be unreasonable to exclude those stakeholders from participation.

### **Q 55 Which of these options do you favour? [Landscape]**

Of the two options identified as reasonable alternatives, we favour Option LA2. Landscape protection policies are not just contained in the JCS and various Site Allocation documents. Some are contained in the Development Management Policies Local Plan and AAPs. According to paragraph 1.25 of the Growth Options document, the GNLP will not amend existing adopted Development Management policies. Additionally, according to paragraph 1.26 the future role of the adopted AAPs for Long Stratton, Wymondham and the North East Growth Triangle and Neighbourhood Plans will be considered in plan making. If there is a possibility that the GNLP will seek to adopt a similar approach to that adopted in the current South Norfolk Local Plan, designating large areas on either side of the main circulatory road for landscape protection with newly worded policies and explanatory texts this should be made clear now and consulted upon properly. Changes to policies and designations would affect individual landownerships and communities and it would be unreasonable to exclude those stakeholders from participation.

In addition, the circumstances which apply to South Norfolk and applied when the Bypass Landscape Protection Zone was first introduced requires interrogation before it is simply and blindly adopted to apply to an entirely different road with very different features.