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| Mr Mike Burrell  Greater Norwich Planning Policy Team Manager | **Date:**  **Please ask for:**  **Customer Services:** | 13th March 2020  Ruth Bishop  03330 162 000 |

Dear Mr Burrell,

**Greater Norwich Local Plan**

**Regulation 18 Draft Consultation**

Thank you for consulting East Suffolk Council (The Council) on the Greater Norwich Local Plan Draft Strategy. The Council would like to take the opportunity to express its support for the Greater Norwich Local Plan Draft Strategy.

**Section 1 – Introduction**

Paragraph 15 refers to a plan period to 20**36**. This needs amending to 2038, as noted elsewhere in the document.

**Section 2- Greater Norwich Spatial Profile**

Paragraph 70 notes that the A146 forms part of the Government’s Major Road Network (MRN) of local non-trunk roads of national importance. East Suffolk is pleased that the importance of the A146 has been recognised as it is a key link between Lowestoft, Beccles and Norwich. The Suffolk County Transport Model (SCTM) – Preferred Option Traffic Forecasting Report (March 2018) notes that the A146 Norwich Road/Loddon Road and the A146 Norwich Road/A143 Yarmouth Road are two junctions that will reach 90-99% capacity by end of the Waveney Local Plan period, 2036. The two junctions are close to Beccles but fall within the South Norfolk Council/Greater Norwich area. Measures to address traffic issues on the A146 near Beccles are likely to be necessary in future reviews of Local Plans. (See page 36 of The Suffolk County Transport Model (SCTM) – Preferred Option Traffic Forecasting Report (March 2018) <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Suffolk-County-Council-Forecast-Highway-Modelling.pdf>)

It may be of interest to the Greater Norwich Planning Policy Team to know that the Barnby Bends bypass Major Route Network improvement proposal has progressed to the next stage with funding to prepare an outline business case. Improvements to the section of the A146 near Barnby, commonly known as the Barnby Bends, would benefit the whole A146 route between Lowestoft and Norwich, and the A143 link to Diss and Bury St Edmunds.

Paragraph 73. The Norwich rail service provides direct access to Lowestoft. Please update the text to include Lowestoft in the list of rail destinations accessible from Norwich.

**Section 3 – The Vision and Objective for Greater Norwich**

Paragraph 108. The Council supports the overall vision and objectives of the Greater Norwich Local Plan.

Paragraph 111 would benefit from explaining what the term ‘clean growth’ means. The terms ‘clean growth’, ‘clean transport’, ‘clean pubic transport’, ‘clean energy’ and ‘clean water’ are used through the document without explanation. It should not be assumed the audience is already familiar with specific terms and jargon. The terms should be explained in the text or included in the glossary in Appendix 2.

**Policy 1 – The Sustainable Growth Strategy**

We support the Greater Norwich Local Plan’s preferred option to support growth, including the use of the Government’s standard methodology for assessing housing numbers and delivery, use of a settlement hierarchy, and approach to the economy. We are pleased the strategy for growth can meet the area’s need for housing, including a buffer, and need for employment land.

**Policy 2 – Sustainable Communities**

Issue No.2 in Table 8 would benefit from more specific and detailed information to facilitate electric and low-emission vehicles and their ancillary infrastructure needs. Developers should be encouraged to provide electric charging points for dwellings with on-plot parking spaces, and to provide ducting and electricity supply to communal and public parking spaces to enable future installation of charging points. This would complement policies for East Suffolk (contained in the adopted Waveney Local Plan and the emerging Suffolk Coastal Local Plan) on facilities for electric charging points, by enhancing provision in the wider network.

A Housing Design Audit for England by Place Alliance (see <http://placealliance.org.uk/research/national-housing-audit/>) found that lower building densities on projects away from the urban core scored poorly in design and there were clear benefits to designing at higher densities with the best schemes averaging 56 dwellings per hectare. This research may be of interest regarding the minimum densities specified in point 4 of the policy.

The Royal Town Planning Institute has produced detailed guidance on how developments can be designed to support people with dementia by creating familiar, legible, distinctive, accessible, comfortable and safe environments. The application of dementia friendly design principles is considered to result in a higher quality environment for all users. Considering the aging population in the Greater Norwich area, and the surrounding area, and rise in dementia, it is advisable to incorporate dementia friendly design principle where appropriate, especially in larger housing developments. (See <https://www.rtpi.org.uk/media/1312/dementiatownplanning-practiceadvice2017.pdf>) Issue No.7 in Table 8 would benefit from specifically referencing dementia friendly design principles. This would complement the policies in the adopted Waveney Local Plan and the emerging Suffolk Coastal Local Plan.

Overall, we support the approach of the sustainable communities policy and requirement for a sustainability statement.

**Policy 3 – Environmental Protection and Enhancement**

We support the approach to the built and historic environment as it is in accordance with the NPPF.

**Policy 4 – Strategic Infrastructure**

We support the approach in the Strategic Infrastructure policy.

**Policy 5 – Homes**

We are pleased that the Greater Norwich area can meet the housing need, including a buffer, as identified using the Government’s standard methodology, and support the approach in the Homes policy.

**Policy 6 – The Economy**

We support the approach in The Economy policy.

**Policy 7.1 – The Norwich Urban Area including the fringe parishes**

We support the approach in The Norwich Urban Area policy.

**Policy 7.2 – The Main Towns**

We support the approach in The Main Towns policy.

**Policy 7.3 – The Key Service Centres**

We support the approach in The Key Service Centres policy.

**Policy 7.4 – Village Clusters**

The Waveney Local Plan identifies Beccles and Bungay as two of the five Market Towns for housing growth in the former Waveney area. The total growth from homes built, existing commitments and allocations in the Waveney Local Plan for 2014-2036 are 1,458 dwellings for Beccles and Worlingham and 557 dwellings for Bungay. Both Beccles and Bungay boarder the South Norfolk/Greater Norwich area. Any housing development in villages close to the former Waveney area is highly likely to impact high schools, medical centres, shops and other services and facilities in Beccles and Bungay. Housing development in the wider South Norfolk area is highly likely to impact traffic on the A146, which is an important link between Lowestoft and Norwich. Junctions on the A146 close to Beccles will be close to capacity by the end of the Waveney Local Plan period in 2036.

The future allocation of 1,200 new dwellings in village clusters in a South Norfolk Village Clusters Housing Allocations Document should take into consideration the impact on services and facilities in East Suffolk and the overall combined impact of proposed development in South Norfolk and the former Waveney areas on the A146. The Council would wish to be notified of progress on the South Norfolk Village Clusters Housing Allocations Document.

We support the overall approach of allocating housing growth in villages to promote their social sustainability and support rural life and services.

**Policy 7.5 – Small Scale Windfall Housing Development**

We support the approach in the Small Scale Windfall Housing Development policy

We trust our comments above are helpful but please do not hesitate to contact us should you require any clarification on the points raised.

Yours Sincerely

**Ruth Bishop | Senior Planning Policy and Delivery Officer**

East Suffolk Council