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# GREATER NORWICH LOCAL PLAN REGULATION 18 CONSULTATION DRAFT STRATEGY

Representations Submitted on Behalf of  
Landstock Estates Limited and Landowners Group Limited

March 2020

**GREATER NORWICH LOCAL PLAN**

**REGULATION 18 CONSULTATION  
DRAFT STRATEGY**

**REPRESENTATIONS SUBMITTED ON BEHALF OF  
LANDSTOCK ESTATES LIMITED AND LANDOWNERS GROUP LIMITED**

**March 2020**

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## 1.0 INTRODUCTION

1.1 These representations are submitted on behalf of Landstock Estates Ltd and Landowners Group Ltd (the Promoters) in response to the Greater Norwich Growth Board (GNGB) consultation on the January – March 2020 Greater Norwich Local Plan (GNLP) Regulation 18 Consultation. The consultation comprises the following:

- Draft Strategy;
- Sites Allocations Document (split between the introduction and separate settlement papers);
- Site Assessment Booklets; and
- The Evidence Base, including the Sustainability Appraisal, Strategic Housing Market Assessment (SHMA) and Housing and Economic Land Availability Assessment (HELAA).

1.2 The Promoters have land interests in North East Wymondham (**Appendix 1**) which forms part of a larger site previously promoted (HELAA Ref. GNLP0525) through the adopted Joint Core Strategy (2013), South Norfolk Site Specific Allocations and Policies Document (2015), South Norfolk Development Management Policies Document (2015) and the Wymondham Area Action Plan (2015).

1.3 In recent years, a number of applications/appeals have been granted/allowed within the north east Wymondham area amounting to circa. 1,700 dwellings. These parcels no longer form part of the site now being promoted, albeit they have been brought forward in a coordinated fashion to facilitate a potential future allocation of land including access rights, vehicle linkages and green spaces.

1.4 Notwithstanding specific land interests, these representations have been prepared in objective terms and assessed against the prevailing planning policy and guidance framework set out within the National Planning Policy Framework (NPPF) (February 2019) and National Planning Policy Guidance (PPG) (various dates).

1.5 These representations should be read in conjunction with those submitted by the Promoters in response to the GNLP Growth Options Regulation 18 consultation undertaken January to March 2018. A copy of the representations submitted at that stage is included in **Appendix 2** but in summary:

- The consultation lacked an appropriate and proportionate evidence base (such as Education matters) to form a view as to the most appropriate strategy;

- The proposed expansion of the Norwich Urban Area to include lower tier settlements outside the continuous urban area was inconsistent with national policy;
- The SHMA demonstrates that a 'Core Area' exists that represents the strongest functional connection to the Norwich Urban Area. Evidence submitted within the representations supports the continued recognition of an area, akin to the existing Norwich Policy Area, to focus growth. A policy should be prepared to that effect;
- The proposed removal of a Core Policy Area (i.e. NPA) results in all the growth options failing to suitably consider the influence of the 'Core Area' and therefore the area with the strongest functional relationship to Norwich;
- Evidence submitted demonstrated the strength of the A11 corridor and that Wymondham, as a Main Town can play a critical role and support more growth than identified;
- Focusing growth within the Cambridge Norwich Tech Corridor is vital to meet the plan's Visions and Objectives and promote economic growth to meet the City Deal aspirations; and
- The promoted site, at Land at North East Wymondham, is deliverable, providing a sustainable location for growth which can, crucially, provide a solution to the existing education capacity issue, subject to sufficient growth being allocated.

**i) National Planning Policy Framework**

- 1.6 The NPPF, published in February 2019, confirms at the heart of the Framework is a 'presumption in favour of sustainable development' (para 10) which should be applied for both plan-making and decision-taking (para 11).
- 1.7 Paragraph 11 confirms that, for plan-making, plans should positively seek opportunities to meet the development needs of their area and strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses.
- 1.8 As confirmed in paragraph 15, the planning system should be genuinely plan-led, with succinct and up-to-date plans providing a positive vision for the future of an area, addressing housing needs and other economic, social and environmental priorities.
- 1.9 Paragraph 16 confirms that Plans should be:
- Prepared with the objective of contribution to the achievement of sustainable development;
  - Be prepared positively, in a way that is aspirational but deliverable;

- 
- Be shaped by early, proportionate and effective engagement;
  - Contain policies that are clearly written and unambiguous;
  - Be accessible; and
  - Serve a clear purpose, avoiding duplication.
- 1.10 Paragraphs 20 – 25 identifies that authorities should include relevant strategic policies for, and any necessary strategic site allocations to deliver:
- An overall strategy for the pattern and scale of development;
  - The homes and workplaces needed, including affordable housing;
  - Appropriate retail, leisure and other commercial activity;
  - Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - Community facilities (such as health, education and cultural infrastructure); and
  - Climate change mitigation and adaptation, and conservation and enhancement of the natural built and historic environment, including landscape and green infrastructure.
- 1.11 Paragraph 23 confirms the requirement for Strategic policies to provide a clear strategy for bringing sufficient land forward, at a sufficient rate, to address objectively assessed needs over the plan period, including allocating sufficient sites to deliver the strategic priorities of the area.
- 1.12 Paragraph 33 identifies that policies in Plans should be reviewed to assess whether they need updating at least once every five years.
- 1.13 Paragraph 35 confirms the tests of soundness against which Plans will be assessed:
- Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework.

## ii) Summary of Representations

1.14 These representations respond to the content of the current Regulation 18 consultation, with reference where applicable to relevant policy, consultation documents and the evidence base. We reserve the right to comment on wider matters in future consultations.

1.15 Whilst the Vision is broadly supported, these representations highlight significant flaws of the proposed Growth Strategy which would fail to deliver the Vision and Objectives of the Plan. In summary:

- Whilst recognition of the role of the A11, and the Cambridge Norwich Tech Corridor is welcomed, this is not reflected in the Growth Strategy;
- The Authorities have significantly underdelivered against previous plan requirements. The full extent and seriousness of this shortfall is not acknowledged. There is a clear justification for a 20% buffer to be applied;
- The Standard Method is the 'minimum' starting point for determining the number of homes needed in the area, with the overall housing requirement needing to reflect City Deal requirements, alongside the appropriate buffer. This would result in a requirement for 49,000 – 54,000 homes to be delivered in the Plan period;
- A full assessment as to whether existing allocations are deliverable within the Plan period needs to be undertaken, as there are clearly those which are not delivering which risks furthering the existing significant housing shortfall;
- The approach 'reserving' the allocation of 1,200 homes to South Norfolk villages as part of a separate Plan document is not appropriate;
- Focusing growth within the Cambridge Norwich Tech Corridor is vital to meet the plan's Visions and Objectives and promote economic growth to meet the City Deal aspirations;
- The Plan should include the use of a Policy area focused towards Norwich City, whether this be based on the established Norwich Policy Area or the SHMA Core Area;
- Wymondham, as the largest town in South Norfolk, within the Norwich Policy Area and SHMA Core Area, and one of the largest settlements on the Cambridge Norwich Tech Corridor, is a location which can be relied upon to actually deliver growth. In the context of under-supply and the unreliability of other locations, greater emphasis should be put on places where the market is confident it can deliver, such as Wymondham;
- Wymondham should be supported for further growth including upgrading the 'contingency' to a full allocation;

- The promoted site, at Land at North East Wymondham, is deliverable, providing a sustainable location for growth which can meet immediate day to day convenience needs and education needs for this new and expanding community, and, crucially, provide a solution to the existing education capacity issue, subject to sufficient growth being allocated.

### iii) Sustainability Appraisal Review

- 1.16 In addition to these Representations a Review of the Sustainability Appraisal (SA) has also been undertaken and is included in **Appendix 3**.
- 1.17 A full SA review is undertaken using a 'traffic light' scoring system to identify areas that would benefit from improvement and those areas considered to comply fully with the requirements. No areas of major deficiency have been identified.
- 1.18 In addition, the review includes a site-specific appraisal of the Site at North East Wymondham utilising the same matrix methodology and fifteen SA objectives used to consider the alternative site options within the SA. This draws on the extensive evidence base available for the Site, including the illustrative masterplan and draft Environmental Statement to be submitted in support a planning application in due course.
- 1.19 The review concludes the Site should be selected for inclusion within any proposed site allocations based on its location, opportunities and performance against the SA objectives, to aid sustainable development in this urban extension area.
- 1.20 Further, the SA does not adequately reference the Cambridge Norwich Growth Corridor, SHMA Core Area or the Norwich Policy Area, when it is clear from the review that the Plan should focus development here.



## 2.0 THE DRAFT STRATEGY

- 2.1 The Draft Strategy sets out a potential planning strategy for growth in Greater Norwich covering the Plan Period 2018 – 2038 identifying the “preferred options” for meeting housing and other growth needs, alongside “reasonable alternative options”.
- 2.2 The consultation document asks 48 questions in respect of general sections of the Draft Strategy or specific policies. These Representations seek to respond directly to a number of these.

**Q1 & Q2) Please comment on or highlight any inaccuracies within the introduction & Is the overall purpose of the Plan Clear?**

- 2.3 Recognition of the role of the A11, and Cambridge Norwich Tech Corridor is welcomed, but this needs to be reflected better in the wider growth strategy. The chapter also highlights some positive things about the sustainability agenda – and the impacts of this – notably the potential ban on gas boilers, phasing out of diesel cars etc. However, this places even more emphasis on the need for growth to be in sustainable locations that have their immediate needs served from a local community perspective. There is a danger that those less affluent in society are impacted harder – due to cost associated with electric vehicles and decarbonising, and this places an even greater need for development to be planned in settlements of sufficient critical size to support a wider range of local services, and in a comprehensive manner to serve the needs of the local population and minimise the need to travel for smaller journeys – i.e. trips to a local convenience store, to drop children at primary school, or to have access to an area of parkland/open space.
- 2.4 Accordingly, we do not support the Authorities’ proposal to ‘reserve’ the allocation of 1,200 homes to Villages as part of a separate Plan document. This approach pre-judges that is the right number of homes to be allocated, before a full assessment of where housing could most sustainably be accommodated. Some villages may have sufficient services to support small scale growth, particularly where they are located within the wider A11 and Tech Corridors, or served by public transport, but directing additional homes to Villages (many of which have limited to zero services) on a very small scale as advocated – i.e. maximum 1 hectare in size but accommodating between 15 and 25 units – as advocated in the Village clusters plan and referenced in paragraphs 25 and 26, risks being totally at odds with the principles of sustainable development.

- 2.5 Some villages and smaller settlements may be appropriate for growth, but to provide additional homes in the manner suggested, would mean between 50 and 80 separate allocations. This would mean development was never of a critical mass enough to support existing or new facilities. This will mean such development is almost wholly reliant on the private car, and totally at odds with the principle of sustainable development. As such the allocations of all sites should be brought into the one plan increasing the overall amount of housing to be delivered in this plan by 1,200 and directing growth to settlements that have the services, and transport connections to support growth.
- 2.6 Furthermore, the idea of simply 'rolling forward' existing allocations suggests that the Authorities have not undertaken an assessment of whether they are currently delivering growth. The role of a new Plan is to assess the most sustainable means of achieving the needs of the Authorities to 2038 and directing it in a means that is sustainable and 'deliverable'. As we shall detail in later sections of these representations, there are existing allocations that are clearly not 'delivering' as highlighted in the significant housing shortfall that has occurred against planned growth in previous Joint Plan. The shortfall of housing has made the affordability of housing even less within the reach of the population. This is highlighted in the SHMA and on page 16 of the Strategy highlighting the salary multiple in South Norfolk has risen to 8.8 x average salary. This is worse than the national average, where the UK has declared a housing crisis, and it is essential that this plan identified the most sustainable strategy for achieving the growth that is required, rather than simply relying on, and rolling forward previous allocations.

### **Q3, Q4 & Q5) Greater Norwich Spatial Profile**

- 2.7 Table 1 highlights the size of Wymondham as a settlement of significantly greater scale than other centres. It is over double the size of the next settlement (Diss), and the facilities available in Wymondham reflect that. Further Wymondham is served by a train station with regular services to the regional employment hubs of Cambridge and Norwich. It is on the A11 linking the cities and within the Cambridge – Norwich Tech Corridor, highlighted in the previous chapter as a strategic objective for growth. It is an obvious location to accommodate growth.
- 2.8 Paragraph 34 acknowledges the residential profile of the area with a high student population and an ageing population. It is accepted that students will live in smaller accommodation, but page 16 of the Strategy clearly highlights that 81% of the housing need is for houses. As such seeking higher density development (i.e. flatted developments) within the City Centre, or within the Norwich Policy Area, will not deliver this need. High density family houses need to be delivered in areas that are appropriate to that context, and where those most in need

can access local facilities. The focus of housing within the most urban areas will arguably deliver housing that is not tailored to need. The Strategy and direction of growth should clearly correspond to where the need can be provided for – and that is locations that can deliver a range of 2 to 5-bedroom houses, including the appropriate amount of affordable housing. Further, consistent with the vision, it should be directed to locations such as the A11 and Cambridge to Norwich Growth Corridor, rather than such a broad distribution as advocated. Again, it is clear that housing has been delivered in Wymondham and has delivered the type of homes tailored to the local need, including 1-bed to 5-bed market and affordable homes. This makes it a location to 'rely' on when actually 'delivering growth'. In the context of under-supply, and the unreliability of existing/previous allocations to deliver, the Authorities should place greater emphasis on where the market is confident it can deliver. Wymondham is this such location.

- 2.9 Reference at Paragraph 44 of the Draft Strategy that 87% of the Housing Target has been delivered is inaccurate. Against a requirement of 22,506 dwellings in the period 2008/09 – 2018/19, only 18,221 dwellings have been delivered (a 4,283 dwelling shortfall), representing circa. 80% delivery. The situation is even worse in the Norwich Policy Area where, against a requirement of 20,163 dwellings only 13,994 dwellings have been delivered (a 6,169 dwelling shortfall), representing only circa. 69% delivery.
- 2.10 Further reference to 133% of the housing target being delivered between 2015/16 and 2017/18 is wholly misleading, given the shortfall that exists (as highlighted further in response to Question 9) of 4,283 homes. The shortfall increases to 6,169 homes within the 'Norwich Policy Area' where growth has been directed in the previous Plan period to 2026. This extent of under-delivery requires the Authorities to fully assess how to ensure delivery of the growth to 2038. It requires a review of where delivery has successfully occurred vs where it has not, and as necessary re-calibrate the direction and location of growth to those locations that have met or exceeded delivery requirements such as Wymondham.
- 2.11 Drawing comparison to average performance across the Country is irrelevant, and the extent of under-delivery we highlight in response to Question 9 should be clearly highlighted here, as it impacts on affordability of housing, which is as local issue, rather than a national issue, and highlighted as an acute issue in the Greater Norwich Area, worse than the national average. It clearly provides the justification for a 20% buffer to be applied rather than the 9% advocated, a matter supported in assertions from the HBF.

**Q6, Q7 & Q8 – Vision & Objectives for Greater Norwich**

- 2.12 The vision is broadly supported, but the means of achieving it and how growth is distributed is not supported by our client. For reasons set out in responses to latter questions, the number of homes to be delivered should be increased, to improve affordability, particularly in context of shortfalls to date. To reduce emissions and enhance green infrastructure, development needs to be planned for in a means that minimises the number of trips undertaken. People will always need to travel for work, and for various other purposes, and it is important therefore to locate growth in areas where public transport is accessible. However, it is also essential to minimise the number of small trips – i.e. to a convenience store; to a local school etc. particularly for those less affluent who may not be able to afford electric and hybrid vehicles in the short-medium term. The plans for NE Wymondham presented will provide immediate day to day convenience needs and a primary School serving in excess of circa. 1,000 homes within walking distances of the Site, alongside access to bus stops within walking distances with services into Norwich and the train station, as well as dedicated cycle access to Norwich.
- 2.13 Paragraph 114 of the Strategy advises that jobs growth will be delivered on strategic sites in and around Norwich, with good access to the public transport and the major road network. However, the Cambridge – Norwich tech corridor represents the most sustainable option to achieve such growth, but equally it is essential that new homes are made available in the same corridor to cater for those that may be employed by the new jobs. Strong cycle links into the City Centre are also essential, and this highlights the need to focus development in locations where public transport, major roads and cycle access is readily available. Wymondham is one such location within the Tech Corridor. The Authorities’ desire to locate up to 1,200 homes in villages – based on allocations that would support no more than 25 homes, would in most instances mean that none of these three criteria would apply. To actively set aside an arbitrary number of homes (1,200) potentially in areas where there are limited services, no cycle facilities and limited public transport, would be contradictory to the principles of sustainable development, and thus contrary to the NPPF and the NPPG. It would fail all 4 tests of soundness contained in Paragraph 35 of the NPPF.
- 2.14 Paragraph 117 highlights that sustainable communities will be where people have good access to “services and facilities including schools, health care, shops, leisure, and community facilities and libraries – which in turn reduce the need to travel”. Accordingly, irrespective of previous allocations, this Local Plan should undertake services audits of each settlement (including the villages), outside the obvious case of the city centre, and identify a hierarchy of centres. Those centres with the greatest variety of services and accessibility should then be identified as the priority for accommodating future growth. There appears to be no such

assessment within the Local Plan or its supporting evidence base, and thus the soundness of the strategy for growth is brought immediately into question. Indeed the Growth locations identified in Map 7 appear to have no rationale, aside from simply carrying forward allocations from the previous plan period irrespective of whether they have delivered, or meet the tests of soundness for compliance with national policy in 2020, as opposed to when the previous iteration of the Plan was prepared.

- 2.15 Similarly, our client wholly supports the sentiment of Paragraph 126, seeking to achieve a radical shift away from the use of the private car. Locations with good quality footpath and cycle links, as well as access to public transport are the most likely locations to achieve such a shift. This is the case for land to the northeast of Wymondham, which has footpath links to the town centre, and dedicated cycle routes into Norwich City Centre. However, achieving this shift will be far more difficult in rural locations and small settlements, where roads are narrow and cannot accommodate cycle/footpaths.
- 2.16 The Plan's Objectives are set out on Page 34, with reference to promoting the 'delivery' of housing, jobs and infrastructure to meet needs. The word delivery being key, as it is a key test of the NPPF. The previous Plan period has failed to deliver the needs of the Greater Norwich Area, particularly in respect of housing as set out in our response to Question 9. This has impacted on affordability and access to housing. The Plan should recognise the shortfalls of over 6,100 homes across the Norwich Policy Area and seek to remedy it through directing growth to locations that have delivered successfully.

**Q9) Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?**

- 2.17 We broadly support the approach to Housing set out in the Delivery Statement.
- 2.18 The Delivery Statement as set out within Section 4 of the Draft Strategy correctly identifies how the delivery of housing, jobs and infrastructure are interlinked and mutually supportive. We support the Plan identifying these matters as being interwoven and expect it to promote and enable growth within key areas which maximise the benefits in respect of these. However, we maintain that growth within the Villages should be assessed as part of a single Plan. Arbitrarily directing 1,200 homes on small sites within villages and small settlements where jobs, infrastructure and supporting services will be least readily available, is not supported. The whole housing provision should be directed to this Plan comprehensively.

- 2.19 Key to this is the need for the Plan for the right number of homes (accounting for past under-delivery anticipated growth). The Authorities appear to have simply identified the minimum number of homes, by referring to the standard method as 40,451 new homes. However, the NPPG states that the standard method is the 'minimum' starting point for determining the number of homes needed in the area. It does not reflect changing economic circumstances. The NPPG specifically highlights that growth strategies and housing deals in place to facilitate greater growth are such reasons to support housing above the standard method. The Strategic Housing Market Assessment for Central Norfolk, specifically references that the three authorities of Broadland, Norwich and South Norfolk have agreed a City Deal with ambitious plans for an additional 13,000 jobs and 3,000 homes by 2026, making their JCS target 27,000 additional jobs, plus those 13,000 City Deal jobs, over the period 2008-26. This is referenced in the Economy Chapter and supporting text to Policy 6 and should be reflected in the Housing Numbers. Accordingly, the SHMA identifies a need for 44,714 new homes across the period 2016 – 2036, which equates to an average of 2,236 dwellings per annum.
- 2.20 It is not clear therefore why Table 6 of the GNLP highlights a need for 40,451 new homes. Further, the SHMA goes on to highlight that to accommodate the additional workers associated with the City Deal, a further 8,361 new homes should also be planned for. Table 6 of the GNLP should therefore clearly provide as a minimum for 44,714 homes, and given the commitment to the City Deal, extend that by a further 8,361 homes in the Plan Period consistent with the NPPG.
- 2.21 Similarly the NPPG states: *"There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests"*
- 2.22 Given the change associated with the standard method, and the high amount of housing in the previous GNLP to 2026, against which there is a significant shortfall, we are strongly of the view that a 20% buffer should be applied. This would support in the region of 9,000 homes over and above the housing need calculated using the standard method, and would thus broadly align with the additional homes that would be required consistent with the City Deal identified within the SHMA.
- 2.23 Once this additional quantity of housing has been accounted for – i.e. circa 49,000 – 54,000, the GNLP should then seek to direct additional growth to the most sustainable locations - for example the A11 and Cambridge to Norwich Tech Corridor as the priority for growth in the region.

2.24 The Joint Core Strategy set a requirement for a total of 36,820 homes to be constructed over the period 2008 to 2026, or 2,046 per year. Expected delivery has failed to materialise resulting in a total shortfall of housing delivery since the start of the Plan period equating to 4,283 homes (a full 2 years of housing requirements). Within the Norwich Policy Area the shortfall is greater with a cumulative under delivery of 6,169 homes since the start of the Plan period (3.4 years of NPA housing requirements).

**Table 2.1: Greater Norwich/Joint Core Strategy Area Housing requirements and delivery (from JCS and AMR's)**

Monitoring Year	Housing Requirement (JCS)	Housing Delivery (JCS Area)	Surplus / Shortfall
2008/09	2,046	1,706	-340
2009/10	2,046	1,237	-809
2010/11	2,046	1,168	-878
2011/12	2,046	1,182	-864
2012/13	2,046	1,214	-832
2013/14	2,046	1,241	-805
2014/15	2,046	1,681	-365
2015/16	2,046	1,728	-317
2016/17	2,046	2,251	+205
2017/18	2,046	2,034	-11
2018/19	2,046	2,779	+733
<b>Total</b>	<b>22,506</b>	<b>18,221</b>	<b>-4,283</b>

**Table 2.2: Norwich Policy Area Housing requirements and delivery (from JCS and AMR's)**

Monitoring Year	Housing Requirement (NPA)	Housing Delivery (NPA)	Surplus / Shortfall
2008/09	1,833	1,163	-670
2009/10	1,833	923	-910
2010/11	1,833	910	-923
2011/12	1,833	915	-918
2012/13	1,833	852	-981
2013/14	1,833	992	-841
2014/15	1,833	1,140	-693
2015/16	1,833	1,164	-669
2016/17	1,833	1,810	-23
2017/18	1,833	1,685	-148
2018/19	1,833	2,440	+607
<b>Total</b>	<b>20,163</b>	<b>13,994</b>	<b>-6,169</b>

- 2.25 We strongly believe that the shortfall in delivery should be remedied in the forthcoming Plan period. Whilst the Authorities have reported an increase in delivery over the past three years in their Annual Monitoring reports, the latter of these for the period 2018/2019 has been specifically reported verbally by the Authorities as 'Draft'. Notwithstanding, the shortfall remains significant, and the means of calculating the delivery is not supported
- 2.26 Further, on the basis of previous under-delivery it is essential that housing numbers are accelerated in the early years of the Plan Period, where we believe a 20% buffer should be provided to the Five Year Housing Supply across the Greater Norwich Area, with a commitment in the Plan to accelerate growth in the first five years of the Plan. Whilst it is recognised that there are external factors that can affect delivery, the collective failure of the Joint Core Strategy's planned allocations in not meeting the target represents a real risk that the existing commitments will not be fully delivered by 2036.
- 2.27 We actively encourage the Authorities to be 'pro-active' and plan for the homes required in the Growth Deal and increase the buffer to 20% (against 'need'). This will also make up for the shortfall against the Core Strategy to date, which we highlight above.
- 2.28 Further, based on previous failings, housing should only be allocated to sites where there is a reasonable prospect of delivery (in line with the requirement of the NPPF). The Plan currently relies on sites (specifically within the Growth Triangle) which have not delivered as anticipated against their Joint Core Strategy requirements. Evidence is not provided to



demonstrate these sites will deliver within the proposed Plan Period which risks the Plan being found unsound on account of being unjustified, not effective and not positively prepared on this basis. This is discussed further in our response to Questions 38 – 40.

- 2.29 In this respect, it will be critical that the Plan allocates deliverable sites in suitable locations. Footnote 45 to the Delivery Statement specifically states that: "*The housing allocations in this draft plan will only be carried forward to the submission version of the Plan if evidence is provided to show that they can be delivered by 2038*". This suggests that the Authorities have not yet undertaken an assessment of when sites will be delivered. The Housing & Economic Land Availability Assessment (HELAA) is vague on detail over delivery and provides no anticipated trajectory as would be expected. As detailed further later in this section, the Growth Strategy fails to achieve this requirement.
- 2.30 We strongly recommend the Authorities revisits the strategy to support development in suitable locations where there has been a track record of delivery. Wymondham, identified as a contingency location, is such a location and continues to experience high demand for new homes.
- 2.31 As a key location within the Cambridge Norwich Tech Corridor, Wymondham should be supported for further growth including upgrading the 'contingency' to a full allocation.

**Q12) Do you support, object, or have any comments relating to the Climate Change Statement?**

- 2.32 We support the principles of the Climate Change Statement, in particular the need to reduce the need to travel, particularly by the private car, and by seeking to locate development in a way that ensures it is close to everyday services and jobs. However, the Strategy as currently drafted fails to do just that. It fails to direct development to the most sustainable locations, simply rolling forward previous allocations, as opposed to identifying those locations that have greatest access to facilities through a services and facilities audit. That audit should inform a hierarchy of sustainable locations against which development should be targeted. The A11 corridor, Cambridge – Norwich tech Corridor is also served by regular trains between Norwich and Cambridge. The locations served by cycle facilities into the city centre, and with direct access to railway stations in this corridor are far more likely to achieve the shift change to non-car modes. To secure a modal shift there has to be genuine choice that is viable, affordable and no more time consuming than the convenience of the private car.

**Q13) Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?**

- 2.33 Simply put, No. Firstly, as highlighted in our response to Question 9, we believe the amount of homes to be identified within the GNLP should as a very minimum be consistent with housing need calculated by the Standard Method and then be increased to account for the Growth Deal, advocated in the SHMA. This would also help make up for the shortfall we have highlighted against the GNLP to 2026. Second, as detailed in our response to questions 38 to 46, the proposed distribution of housing within the hierarchy is unjustified and would not be effective at delivering housing requirements over the plan period.
- 2.34 We would stress that a number of the allocations that appear to have been 'rolled forward' are failing to deliver homes. Allocation GT6 (Land at Brook & Laurel Farm) has not yet commenced, despite permission being granted in June 2014. Work is yet to commence on Allocation GT11, and we note that planning permission has not yet been granted for the Larkfleet Homes site East of Broadland Business Park. Combined these sites are anticipated to deliver 1,450 homes. Accounting for the "Nathaniel Lichfield & Partners Start to Finish – How Quickly do large scale housing sites deliver" (NLP November 2016) on average these sites would take 5.3 years to actually deliver houses, of which circa 13 months would be post approval of planning. The lead in time for smaller sites below 500 units extends to circa 2 years from the grant of planning permission. Sites GT13, GT14, DRA1, HEL1 and REP1 fall into this category. The AMR provides no evidence of delivery or update on progress. As such to carry forward such allocations, the Authorities must (a) be confident (through the provision of clear evidence) that they will be granted planning permission and commence in the Plan period; and (b) be confident that sites GT6 and GT11 will start delivering units before 2028 given the average build out rates for sites of this size are identified by NLP to represent no more than 86 dwellings per annum on Greenfield sites and no more than 52 dwellings per annum on brownfield sites.
- 2.35 In addition, we highlight that Sites GT12 and GT16 are anticipated to deliver 3,500 and 3,000 dwellings respectively in the Plan period. To date neither have commenced – despite being anticipated to deliver from 2019/2020 and 2016/2017 respectively. In the case of GT12, the latter phases are dependent on Infrastructure Forward Funding. Neither sites have secured detailed permission for any phase. Even if permission was to be granted now, accounting for NLP lead in times, they would not commence before 2021. This is ambitious, and even then would have to deliver housing at a rate of 220 dwellings per annum in the case of GT12, and 227 dwellings per annum in the case of GT16 (as set out in the AMR which anticipates no housing on site until 2024). NLP 2016, highlights average build out rates of 171 dwellings per annum on greenfield sites of this size, reducing to 148 dwellings per annum for brownfield

- sites. Based on these averages and the anticipated delivery rates in the 2018/2019 AMR, it would result in a housing shortfall of over 1,200 homes in itself. Accordingly, these allocations should be reduced to 2,927 (GT12) and 2,388 (GT16) respectively. The shortfall must be accounted for elsewhere.
- 2.36 Further, we would highlight that the sites identified above are within the Growth Triangle, where there are clearly questions over deliverability. Allocating additional homes to the Growth triangle in the context of under-delivery on housing to date (a shortfall of 6,169 homes in the NPA), and uncertainty over delivery of sites, would further undermine confidence in the ability of the GNLP to deliver on its needs to 2038.
- 2.37 In addition we note that Page 46 of the GNLP highlights uncertainty over the site of Carrow Works. This accounts for a further 1,200 homes. If there is uncertainty over delivery it should be removed from the Plan. Accordingly, accounting for Carrow Works, and the reductions to allocations GT12, and GT16 we have highlighted above, a further 2,400 need to be identified in the Plan to alternative locations, notwithstanding the additional housing we believe should be provided for in response to Question 9.
- 2.38 We would also stress that Long Stratton is subject to 2no. Hybrid applications submitted Jan and Feb 2018 for 600 dwellings (213 detailed) and 1,275 dwellings (zero detailed) respectively. Both applications remain undetermined. Based on the NLP lead in times, it is unlikely either of these will deliver any houses before 2023/24 (accounting for 5.3 years for schemes of 500-999 dwellings and 5.7 years for schemes of 1,001 – 1,499 dwellings). Based on average build out rates of 86 dwellings per annum, it is unlikely all of the 1,800 homes can be delivered within the plan period to 2038, requiring a further adjustment.
- 2.39 Accounting for the matters we highlight in paragraphs 2.33 – 2.36 above, the distribution of housing set out in Map 7 and Policy 1 should be adjusted. In addition, we strongly object to simply allocating 1,200 additional homes to South Norfolk Village clusters on the grounds of sustainable development. These 1,200 homes should be brought back into the GNLP. Together there is therefore a need to identify additional land for circa 4,000 homes as a minimum, which would increase to circa 13,000 further homes should growth from the New Deal be planned for, as we advocate in response to earlier questions.
- 2.40 As set out in our March 2018 representations we endorse a strategic growth option which serves and supports an identified 'Core Area' whilst focusing and delivering development along the A11 corridor, fulfilling the Spatial Objectives of supporting the Cambridge to Norwich Tech Corridor plus locating growth near to jobs and infrastructure. We continue to advocate this approach which will fulfil the Vision and Objectives of the GNLP, whilst achieving

the full potential of the Cambridge Norwich Tech Corridor in a sustainable way that is consistent with the Climate Change Statement. This area should be the focus of accommodating the above shortfall, and the Housing Growth Allocations and Policy 1 should be updated to reflect that.

- 2.41 The proposed dispersal should align more closely with the Growth Strategy. As discussed above there are aspects of the current approach which need amending and will require additional new allocations to be identified. This should include locating additional development in Wymondham, one of the largest towns on the Cambridge Norwich Tech Corridor, and a reduction in reliance of Sites in the Growth Triangle in recognition of past poor delivery.

**Q14) Do you support, object or wish to comment on the approach for housing numbers and delivery?**

- 2.42 We support the identification of the Government's standard methodology as the starting point for calculating the housing requirements of the Plan. This is consistent with the requirements of the NPPF as the standard methodology is a demographic-based figure which includes an uplift for affordability, partly accommodating past shortfall.
- 2.43 Planning Practice Guidance (Paragraph 010 Reference ID 2a-010-20190220) identifies the circumstances where it may be appropriate to plan for a higher housing need figure than the standard method indicates including situations where increases in housing are likely to exceed past trends because of growth strategies or strategic infrastructure improvements.
- 2.44 The City Deal, which was signed into effect by the Government in December 2013, gives Greater Norwich increased freedom to help business grow and create economic growth. As detailed in the City Deal report (December 2013), the deal aims to bring an additional 13,000 jobs and 3,000 homes (above Joint Core Strategy requirements) to the Greater Norwich Area. As detailed in the Central Norfolk Strategic Housing Market Assessment (June 2017) this equates to a total of 45,390 jobs over the plan period.
- 2.45 Paragraph 4.19 of the Growth Options Consultation Document (January 2018) identified the housing requirement may need to increase to support potential job growth arising from the City Deal, resulting in 1,700 further dwellings being required. No reference to this is included in any form within the Draft Strategy. Furthermore, the Strategic Housing Market Assessment for Central Norfolk, specifically references that the three authorities of Broadland, Norwich and South Norfolk have agreed a City Deal with ambitious plans for an additional 13,000 jobs and 3,000 homes by 2026, making their JCS target 27,000 additional jobs, plus those 13,000

- City Deal jobs, over the period 2008-26. This is referenced in the Economy Chapter and supporting text to Policy 6 and should be reflected in the Housing Numbers.
- 2.46 Nevertheless, the Draft Strategy confirms the GNLP will seek to over-allocate by means of a 10% buffer (equating to circa. 4,050 dwellings) to ensure delivery. It needs to be clarified whether this includes some of the dwellings required by the City Deal (8,361 homes as advocated at figure 101 of the SHMA), thereby reducing the delivery buffer, or if the City Deal requirement will be in addition to the housing requirements identified in Table 6.
- 2.47 It is not clear therefore why Table 6 of the GNLP highlights a need for 40,451 new homes. Further, the SHMA goes on to highlight that to accommodate the additional workers associated with the City Deal, a further 8,361 new homes should also be planned for. Table 6 of the GNLP should therefore clearly provide as a minimum for 44,714 homes, and given the commitment to the City Deal, extend that by a further 8,361 homes in the Plan Period consistent with the NPPG. 3,000 of these homes should be delivered by 2026 in accordance with the commitments of the City.
- 2.48 Similarly the NPPG states: *"There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests"*.
- 2.49 Given the change associated with the standard method, and the high amount of housing in the previous GNLP to 2026, against which there is a significant shortfall, we are strongly of the view that a 20% buffer should be applied. This would support in the region of 9,000 homes over and above the housing need calculated using the standard method and would thus broadly align with the additional homes that would be required consistent with the City Deal identified within the SHMA.
- 2.50 Once this additional quantity of housing has been accounted for – i.e. circa 49,000 – 54,000, the GNLP should then seek to direct additional growth to the most sustainable locations - for example the A11 and Cambridge to Norwich Tech Corridor as the priority for growth in the region.
- 2.51 The 'alternative approaches' to housing numbers identifies that whilst the NPPF encourages a higher housing requirement, this is not the preferred option as evidence of delivery over the medium and longer term suggests that higher targets are unlikely to be achievable or deliverable. We do not believe this position is evidenced, and in fact past poor delivery has

been as a result of incorrect sites being allocated and an overreliance on sites within the Growth Triangle (as detailed above and further in response to Questions 38 – 40).

**Q16) Do you support, object or wish to comment on the approach to Review and Five-Year Land Supply?**

- 2.52 We support the option for the Plan to be reviewed after 5 years, which is consistent with the requirement of the Framework (para 33). The NPPF states that plans should be “reviewed to assess whether they need updating at least once every five years” and goes on to state that reviews “should be completed no later than five years after the adoption date of that plan”. As such the Authorities’ policy to review the plan 5 years after adoption is not consistent with national policy. The review must be completed prior to the plan being five years old to allow for the prompt updating of the plan if necessary. We would therefore suggest the following change is made: “This plan will be reviewed and the Authorities will complete and publish a review of this plan 5 years after adoption to assess whether it needs to be updated”.

**Q19) Do you support, object or have any comments relating to the specific requirements of the Policy?**

- 2.53 We would highlight that Point 4 of Policy 2 ‘Sustainable Communities’ seeks to make the most efficient use of land supporting densities of 25 dwellings per hectare across the plan area. This highlights the need to reconsider the approach advocated to Village clusters, where the criteria is for sites of no more than a hectare yet delivering 15 units. This highlights the need to allocate greater quantum of land to locations such as Wymondham and larger settlements where the density can be met without impacting on local character.

**Q24) Do you support, object or have any other comments relating to other strategic infrastructure (energy, waste, health care, schools and green infrastructure)?**

- 2.54 The scale of development will clearly require the provision of new infrastructure to appropriately and sustainably meet the demands of this growth.
- 2.55 There are key pieces of infrastructure that are necessary to be addressed that have otherwise not been delivered or proposed to be delivered as part of the Joint Core Strategy 2013. A good example, and as detailed further below, is the need to positively address the Education capacity issue in Wymondham. This is an issue that has been highlighted by the Examining Inspector for the Wymondham Area Action Plan as being “necessary to review” as part of future plan-making exercises.

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**Q38 - 40) Consultation Questions for Policy 7.1 – The Norwich Urban area including the fringe parishes**

- 2.56 The introduction to the draft Sites Allocation Document (SAD) confirms the document identifies the preferred sites for new allocation, the allocations to be carried forward from the current Local Plans, reasonable alternative sites (where appropriate) and unreasonable housing sites. The SAD is split into 50no. Settlement Papers which summarises the settlement characteristics and the existing and/or proposed allocations.
- 2.57 In the main, these provide a brief summary of existing allocations, and review whether these remain deliverable within the new Plan Period, and the sites submitted through previous call for sites, providing a rationale for why the sites should or should not be allocated.
- 2.58 One exception to the above are the existing allocations within the Growth Triangle, allocated through the Growth Triangle Area Action Plan (2016), which the Settlement Papers conclude to be carried forward:

**High amounts of existing development commitment remains, as the allocations identified in the Growth Triangle Area Action Plan will not be superseded by the new local plan**

- 2.59 No justification for this approach is provided within the Draft Strategy or the SAD.
- 2.60 As acknowledged in Table 2.1 and 2.2, the JCS has delivered poorly against its housing requirement since the start of the Plan period. A significant failing of the JCS has been the under delivery of allocations within the Growth Triangle. In particular allocations GT6, GT11, GT12, GT13, GT14 and GT16.
- 2.61 Policy 7.1 (The Norwich Urban Area including fringe parishes) identifies 12,019 dwellings as the 'existing deliverable commitment' for The Growth Triangle with 1,415 additional dwellings proposed through the GNLP.
- 2.62 Of the 12,019 committed dwellings, Appendix B1 (Broadland Sites Forecast) of Annual Monitoring Report 2018 – 19 (AMR, **Appendix 4**) identifies the Growth Triangle area is expected to deliver 4,485 dwellings between 2019/20 – 2025/26 (i.e. the remainder of the Joint Core Strategy Plan Period).
- 2.63 The AMR identifies the remaining 7,623 dwellings will be delivered in '2026 and beyond'. No updated trajectory is provided within the AMR or as part of the current GNLP consultation to demonstrate when these 7,623 dwellings (circa. 23% of the existing commitments) will be delivered i.e. by 2038 or beyond.

2.64 Table 2.3 below summarises 4no. allocated Growth Triangle sites which account for circa. 6,350 dwellings of the supply to be delivered '2026 and beyond', not account for additional dwellings identified to be delivered in 2024/25 – 2025/26 (for which no evidence is provided).

**Table 2.3: Growth Triangle Area Action Plan allocations**

Site	AMR Status	Evidence of delivery	Notes
Land at Brook Farm & Laurel Farm (GT6)	Not identified to start delivering until 2024/25 with 533 dwellings beyond 2026.	No evidence included in AMR to demonstrate this is achievable.	GTAAP expected delivery 2018/19 – 2024/25.
Land East of Broadland Business Park (GT11)	Not identified to start delivering until 2024/25 with 465 dwellings beyond 2026.	No evidence included in AMR to demonstrate this is achievable.	GTAAP expected delivery 2018/19 – 2024/25.
Land to the North of Sprowston and Old Catton (GT12)	Phase 1 delivery from 2019/20 but later phases not identified to start delivering until 2024/25 with 2,625 dwellings beyond 2026.	Evidence (AMR Appendix C1, page 86 – 87) suggests phase 1 is now achievable (733 dwellings, all identified to be delivered by 2025/26) following receipt of Homes England development funding. Later phases reliant on Housing Infrastructure Fund forward funding for strategic infrastructure required upfront to development.	GTAAP expected delivery of first 1,736 dwellings 2016/17 – 2026, with 1,784 dwellings beyond 2026.
North Rackheath (GT16)	Not identified to start delivering until 2024/25 with 2,728 dwellings beyond 2026.	No evidence included in AMR to demonstrate this is achievable.	GTAAP expected delivery of first 1,300 dwellings 2019/20 – 2026, with 1,700 dwellings beyond 2026.



- 2.65 Sites GT12 and GT16 are anticipated to deliver 3,500 and 3,000 dwellings respectively in the Plan period. To date neither have commenced – despite being anticipated to deliver from 2019/2020 and 2016/2017 respectively. In the case of GT12, the latter phases are dependent on Infrastructure Forward Funding. Neither sites have secured detailed permission for any phase. Even if permission was to be granted now, accounting for NLP lead in times, they would not commence before 2021. This is ambitious, and even then would have to deliver housing at a rate of 220 dwellings per annum in the case of GT12, and 227 dwellings per annum in the case of GT16 (as set out in the AMR which anticipates no housing on site until 2024). NLP 2016, highlights average build out rates of 171 dwellings per annum on greenfield sites of this size, reducing to 148 dwellings per annum for brownfield sites. Based on these averages and the anticipated delivery rates in the 2018/2019 AMR, it would result in a housing shortfall of over 1,200 homes in itself. Accordingly, these allocations should be reduced to 2,927 (GT12) and 2,388 (GT16) respectively. The shortfall must be accounted for elsewhere.
- 2.66 The GNLP needs to provide a clear evidence-based justification for carrying over allocations identified in the Growth Triangle Area Action Plan. No such evidence is currently provided and as such the Plan risks being found unsound on account of being unjustified, not effective and not positively prepared on this basis. At the very least, we highlight for valid reasons the allocations GT12 and Gt16 cannot deliver the numbers anticipated, which should result in a reduction of 1,200 homes.
- 2.67 Furthermore, the Growth Strategy seeks to allocate additional land within the Growth Triangle with a proposed allocation for 1,200 dwellings in Sprowston. This site is under the control of the developers of the adjoining GT20 allocation (White House Farm) which is subject to an Outline application for 516 dwellings submitted August 2019 pending determination (application ref. 20191370). The AMR identifies an expectation for GT20 to commence in 2021/22 and complete in 2025, however given Outline consent has not yet been granted (and subsequent Reserved Matters prepared and submitted), this may be optimistic. The proposed allocation in Sprowston is identified to be built out after GT20 has completed. It is therefore unlikely the proposed allocation, for 1,200 dwellings, will be delivered within the Plan period. Policy 7.1 and Policy 1 should be updated to reflect this site is unlikely to deliver its full allocation within the Plan period.
- 2.68 To ensure the Plan delivers its housing growth requirement over the Plan Period, there is clearly a need to reduce the reliance on the Growth Triangle allocations which have not delivered as anticipated and allocate additional sites which are developable within the Plan Period, including in other locations outside the Growth Triangle.

- 2.69 Furthermore, Page 94 of the GNLP highlights that there is uncertainty over the Unilever/Carrow Works site. The NPPF requires clear evidence of delivery, and as such this allocation should be removed. As detailed in Section 3, Wymondham is such a location to accommodate at least some of this growth.
- 2.70 Accounting for the above, 1,200 homes as a minimum should be removed from the Growth Triangle, with further justification provided for all homes to be delivered in this location. Based on delivery to date in the Growth Triangle, we also strongly object to the addition of a further 1,415 homes in this location. To continue to rely on housing delivery in the Growth triangle undermines confidence in the GNLP to deliver on its needs. As such a minimum of 2,615 homes should be removed from the Growth triangle and re-allocated. As detailed in Section 3, Wymondham is such a location to accommodate at least some of this growth.
- 2.71 Within Wymondham, the Promoters have successfully secured consents resulting in circa. 900 dwellings being completed in the past 14 years from unidentified sites. This reflects not only the suitability of Wymondham as an appropriate location (i.e. people want to live there) but also represents a proven and trusted track record for the Promoters in bringing forward suitable sites.

#### **Q41 - 42) Consultation Questions for Policy 7.2 – The Main Towns**

- 2.72 The Main Towns consist of the settlements of Wymondham, Aylsham, Diss and Harleston. Policy 1 of the Draft Strategy also identifies Long Stratton as a Main Town. Clearly Wymondham is a settlement at least twice the size of any subsequent settlement, and given the services available, it should be identified as a 'Large Main Town' in a means that separates it from the other towns. An audit of facilities and services should be undertaken to support this assertion and create a hierarchy of settlements for which Wymondham should be singled out as the largest town and the most suitable to accommodate growth. This would support the basis for the additional 1,000 homes identified for Wymondham as a 'contingency' location, and also support the case for it to accommodate a portion of the additional growth we have identified as (a) needing to be identified to accommodate additional homes linked to the Growth Deal; and a buffer of 20%; and (b) needing to be re-allocated as a result of re-directing (i) 2,615 homes from the Growth Triangle; (ii) 1,200 homes from East Norwich to account for uncertainty over Carrow Works; and (c) potential re-allocation of land from the 1,200 homes proposed in the Village Clusters (see response to Questions 45 and 46).

- 2.73 We do not object to the identification of Long Stratton given the existing growth committed for the town and its location within the Norwich Policy Area, but as set out in response to Question 13, we do believe the allocation needs scrutinising as based on NLP 2016 evidence, we believe it is unlikely that 1,800 homes can be delivered in Long Stratton before 2038.
- 2.74 As acknowledged at paragraph 308 of the Draft Strategy the Main Towns play a vital role in the rural economy, providing employment opportunities and services for wider hinterlands. We agree with this description but consider Wymondham to have additional roles and services which elevates it above the other Main Towns. Furthermore, Wymondham is located within the Norwich Policy Area (and SHMA 'Core Area') and within the Cambridge Norwich Tech Corridor.
- 2.75 Given the emphasis of the GNLP to focus housing, employment and infrastructure growth within a 'Strategic Growth Area' (illustrated on the Key Diagram of the Draft Strategy) which broadly reflects the Cambridge Norwich Tech Corridor, it is unclear why Wymondham is not a key location for growth within the Plan, and separated out as such within a settlement hierarchy.
- 2.76 Policy 7.2 identifies Wymondham to have an existing deliverable commitment of 2,463 dwellings (including delivery 2018/19). The AMR identifies 1,140 dwellings to be delivered in the next 5-years (2019/20 to 2023/24) with a further 328 dwellings to be delivered in the remainder of the JCS Plan Period.
- 2.77 For 2026 and beyond the AMR identifies a supply of only 502 dwellings for the latter phases of South Wymondham (477 dwellings) and for London Road/Sutton Lane (35 dwelling). This level should be significantly increased given its previous success in delivering homes, to accommodate at least a portion of the homes we have identified as (a) needed to accommodate additional homes linked to the Growth Deal and a buffer of 20%; and (b) needed for re-allocation as a result of re-directing (i) 2,615 homes from the Growth Triangle; (ii) 1,200 homes from East Norwich to account for uncertainty over Carrow Works; and (c) potential re-allocation of land from the 1,200 homes proposed in the Village Clusters (see response to Questions 45 and 46).
- 2.78 The Draft Strategy proposes to allocate an additional 100 dwellings only in Wymondham, across 2no. sites (50 dwellings each). Across the extended Plan Period (2026 – 2038) there is only likely to be circa. 600 dwellings delivered in Wymondham, despite the key location of the settlement within the Cambridge Norwich Growth Corridor and past strong housing delivery. This simply does not represent sustainable planning, and by raising its position

within the settlement hierarchy the case can be made to support additional growth that needs to be re-allocated.

- 2.79 The GNLP does give some recognition to Wymondham, by acknowledging it as a settlement that could accommodate a contingency of 1,000 dwellings. This was based on whether “the GNLP area does not meet its local plan targets”. We have highlighted for reasons above, that the GNLP does not (a) plan for enough housing growth to meet need, particularly as a result of the Growth Deal; and (b) needs to re-allocate land that cannot deliver the anticipated level of housing – i.e. in the Growth Triangle; Carrow Works; Long Stratton and the Village Clusters. Accordingly the ‘contingency’ for Wymondham should be enacted into this Local Plan now, and additional growth beyond the 1,000 dwelling contingency should be allocated to Wymondham given its sustainable location within the A11 and Cambridge to Norwich tech corridor.
- 2.80 The supporting assessment of Wymondham identifies that there are 7 ‘reasonable’ sites that could accommodate additional growth. Park Farm (Site GNLP2168) and Stanfield Road (Site GNLP1055) are identified as new settlements, for which there is no need identified. However, Sites GNLP2155, GNLP2150 and principally GNLP0525R, were identified as ‘reasonable’ sites that together could knit circa 1,730 new dwellings into the housing that has already been delivered at the former Rugby Club; planned at Elm Farm, and located to the north of Tuttle Lane and Norwich Road. As set out in Chapter 3, our client has land that is available, non-constrained and deliverable, that can provide a new sustainable community heart to the existing housing that has been delivered to date, that is permitted at Elm Farm, in addition to a further 600 homes, supported by a new primary school and a Local Centre. This land can also deliver a new Country Park and land for a new Sixth Form College.
- 2.81 The land offers the opportunity to create a new sustainable community that delivers infrastructure to the immediate community and has wider benefits to the town in respect of open space and education provision. This is a well located site within the A11 and Cambridge – Norwich Tech corridor, with good access to trains, bus facilities and dedicated cycle routes. It should form at least part of additional land allocations to Wymondham, necessary to deliver the growth required, and in need of being re-allocated for the reasons set out in responses to previous questions.
- 2.82 As detailed in Section 3 there is an existing education capacity constraint in Wymondham which was not addressed at the time of adoption of the Wymondham Area Action Plan but confirmed by the Examining Inspector as a matter which justified an early review of the Plan and needing a solution. A solution to this is achievable, through the re-location of Wymondham High Sixth Form, and supported by Norfolk County Council Education. However,

this is not currently being addressed by the adopted Development Plan, nor would it be addressed by the emerging GNLP in its current form.

- 2.83 Only through the allocation of sufficient growth to Wymondham will the GNLP resolve the ongoing education capacity constraint. The education 'issue' therefore must be dealt with through this plan-making process, and our client's land offers the opportunity to address that constraint through the provision of sustainable new community that will also bring local shops and services, a new Primary School and a new public park.
- 2.84 In order to achieve the Vision and Objectives set by the Growth Strategy, including realising the full potential of the Cambridge Norwich Growth Corridor and meeting existing infrastructure requirements, it is necessary for the Plan to support Wymondham as a key location for growth, beyond current commitments.
- 2.85 In addition to the above, whilst we have no objection to the Main Towns receiving additional growth to ensure they continue to successfully achieve their roles as providers of employment and services to serve rural areas, but it is clear, for the reasons we have established Wymondham, should be set apart as a new settlement hierarchy to accommodate a higher portion of the additional growth.
- 2.86 Notwithstanding the above comments, we do question why Harleston, as the smallest Main Town, is identified for allocations totalling 450 dwellings in addition to the existing commitments (173 dwellings). Harleston is the least accessible Main Town, not being located on the rail network or on an A road which connects to Norwich and is not located within the Norwich Policy Area or the SHMA Core Area.
- 2.87 The Draft Strategy is therefore not considered to be justified or effective in line with the requirements of the Framework. As such, the proposed strategy is considered unsound.

#### **Q43 - 44) Consultation Questions for Policy 7.3 – The Key Service Centres**

- 2.88 We support the identification of the Key Services Centres as locations which have an important role to play within the overall settlement hierarchy, providing facilities and services to serve the settlement and its hinterland.
- 2.89 Of these, the Draft Strategy only seeks to allocation additional land in Acle, Blofield, Hingham and Loddon/Chedgrave for housing, totalling 515 dwellings.

2.90 With the exception of Hethersett, which has a significant existing deliverable commitment, none of the Key Service Centres are located within the Cambridge Norwich Growth Corridor. However, Poringland, Hethersett, Brundall and Blofield are located within the Norwich Policy Area and, additional to these, Acle is located within the SHMA Core Area.

2.91 Whilst we do not object to the approach to allocating a limited level of development to the Key Service Centre, in line with our comments in respect of the Main Towns, the strategy needs to be justified, including ensuring it aligns with the Plan's Vision and Aims. As currently drafted, it is unclear why settlements outside of the NPA/Core Area (the area with the strongest functional connection to Norwich) have been chosen in place of those within it.

**Q45 - 46) Consultation Questions for Policy 7.4 – The Village Clusters**

2.92 We object to the approach advocated for the village clusters. Whilst it is acknowledged that these can make a vital contribution towards meeting housing and other growth requirements across the Plan Period, to arbitrarily allocate 1,200 additional homes is not justified or supported by clear evidence. We would argue it conflicts with the principles of sustainable development, and that growth should be focused on larger settlements, particularly those in more sustainable locations, such as the A11 corridor, served by rail and within the Cambridge – Norwich Tech Corridor.

2.93 Paragraph 25 of the Draft Strategy acknowledges that whilst the GNLP promotes housing choice and supports economic activity within the rural parishes, South Norfolk has decided to progress a separate development plan document to meet the overall housing numbers for its village clusters set out in the plan.

2.94 The decision to delay allocation of these sites until a further Development Plan document has been drafted, consulted on, and Examined separately risks serious impeding delivery of a substantial element of housing growth to be delivered by the Plan. Further, the current approach would support up to 80 separate small allocations if it is based on sites of no more than a hectare in size.

2.95 To ensure the Plan is positively prepared, effective and consistent with national policy, the GNLP should be seeking to allocate all housing to achieve its total growth needs in the GNLP, and distributed in a clearly evidenced manner that reflects the principles of sustainable development.

**Q48) Any other Comments?**

- 2.96 As set out within our March 2018 representations to the Growth Options Consultation Document we continue to support the use of a Policy area focused towards Norwich City.
- 2.97 Historically this has been achieved with the Norwich Policy Area (NPA) which enabled growth to be focused in the right areas to deliver a Norwich-centric spatial strategy and allow for appropriate monitoring.
- 2.98 The SHMA (2017), identifies that the NPA itself does not form a functional housing market area (HMA). As such, the Growth Options Consultation Document identified the GNLP would no longer include an NPA specific housing land supply.
- 2.99 The Draft Strategy contains no reference to the NPA or the 'Core Area' which the SHMA identifies as a functional HMA.
- 2.100 We strongly object to the loss of a Policy Area focused towards Norwich City with the Draft Strategy continuing the approach to confuse the role of a SHMA for the purposes of determining Housing Needs and a specific policy based area to ensure the right growth is delivered in the right locations.
- 2.101 The Greater Norwich Technical Report prepared to support our March 2018 representations (**Appendix 2**) the NPA continues to represent a relevant area to direct growth, being an appropriate Travel to Work Area where future job growth will be focused.
- 2.102 The GNLP evidence base further provides support for a functional HMA, in the form of a 'Core Area' (including Acle, Aylsham and Loddon). However, given no other settlements outside this area are sufficiently self-contained to establish a separate HMA (or areas), the SHMA concludes the most appropriate HMA, for the plan, is the Central Norfolk HMA.
- 2.103 Nevertheless, there is a clear evidence an area exists with the strongest functional connection to the Norwich Urban Area.
- 2.104 We strongly urge the GNLP to continue the approach set by the NPA in directing growth to a defined area (whether NPA or similar distinction) with the strongest functional relationship to Norwich. The boundary of this area should also reflect the preferred spatial strategy i.e. towards an A11 focus.

2.105 Without a Policy Area focusing growth in key locations, there are risks that the strategy will fail.



### 3.0 SUITABILITY OF WYMONDHAM

- 3.1 The market town of Wymondham is the largest settlement in South Norfolk, classified as a Main Town within the adopted Joint Core Strategy Settlement Hierarchy. The town is located to the north/north west of the A11 trunk road (Wymondham Bypass) and is approximately 7km south-west of the outskirts of Norwich.
- 3.2 Wymondham currently has outstanding commitments of circa. 1,980 dwellings. Appendix B3 of the AMR (**Appendix 4**) identifies circa. 1,117 dwellings to be delivered over the next 5-year period (2019/20 – 2023/24), with a further 328 dwellings to be delivered in the remaining JCS plan period (up to 2026) and the remainder (circa. 512 dwellings) beyond 2026.
- 3.3 The JCS identified a minimum of 2,200 dwellings to be built in and around Wymondham by 2026. Across 2008 – 2019, circa. 1,700 dwellings have been delivered (circa. 140dpa) including 800 dwellings delivered in the last 3 years.
- 3.4 The town therefore has and continues to successfully deliver and remains a location with a strong demand for further growth.
- 3.5 Due to its size in relation to other settlements, Wymondham should be identified in its own right at the top of the settlement hierarchy of towns. There is a clear case to accommodate additional growth than that currently planned for in the GNLP and to re-distribute growth that is undeliverable within the Growth Triangle; Long Stratton; Carrow Works; and unsustainable within the Village Clusters.
- 3.6 As a key settlement within the Norwich Policy Area as defined by the Joint Core Strategy and within the 'Core Area' identified by the SHMA, Wymondham is identified as appropriate for a 'contingency' of 1,000 homes, which should be enacted and increased to account for the additional and re-allocated need. As one of the largest towns on the Cambridge Norwich Tech Corridor, that has delivered a number of homes in recent years, it is an obvious location to accommodate additional growth in the short – medium term in a sustainable and deliverable way.
- 3.7 Notwithstanding the need to accommodate additional homes, it is recognised that the Wymondham Area Action Plan (2015) identified 3no. key constraints for the town:

### *The Strategic Gap*

A strategic gap has been defined to maintain the separation of Wymondham and Hethersett and safeguard the identity of each settlement. The importance of this gap is confirmed in Policy 10 of the JCS. Policy 4.7 of the Development Management Policies Document seeks to maintain the openness of the strategic gap between Wymondham and Hethersett and inappropriate development which has an unacceptable impact on the openness and separation afforded by the gap will not be permitted. Future growth to the north and north-east of Wymondham is therefore constrained.

### *Wymondham Abbey and the Historic Landscape Setting of the Town*

Wymondham Abbey is a Grade I listed building and its ruins and surrounding meadows are designated as a Scheduled Monument. Wymondham Abbey is arguably the single most historic and important building in the whole of South Norfolk and safeguarding its setting is a critical consideration for the AAP. The importance of protecting the historic setting of the town and abbey is confirmed in Policy 10 of the JCS. Views of the Abbey tower can be seen from a considerable distance, particularly from the west and north-west, but there are glimpsed views from many other parts of the town. Future growth to the west of Wymondham is therefore constrained and development elsewhere (particularly in the south-western part of the town) would need careful consideration.

### *The capacity of Wymondham High School (Academy)*

Wymondham High School (Academy) and Norfolk County Council (as Education Authority) are in agreement that the High School can accommodate additional pupil numbers from up to 2,200 new homes in the period to 2026, but no more. The school's site is constrained, and whilst investment plans are in place to accommodate the additional numbers, the school strongly wishes to retain both its playing fields and sixth form on one site. As an Academy, the scope for Norfolk County Council to 'dictate' admission policy and future expansion proposals is much more limited than for a grant maintained school.

- 3.8 As detailed further in section 4, the Site, at North East Wymondham, can successfully accommodate development despite these constraints. It is not located in the Strategic Gap (with the exception of an area of proposed Country Park, which is appropriate within the Gap designation), it does not affect the setting of the Grade I Wymondham Abbey, and it provides a solution to the education capacity constrain issue.

**i) Secondary Education Capacity**

3.9 As acknowledged within the Wymondham Area Action Plan, previous plan making exercises and relevant Inspector's Reports, there is a clear need to resolve secondary education capacity in Wymondham. The WAAP Inspector, in his report, acknowledged:

**It will be necessary to review the planning and provision of school places in the light of any new housing requirement that extends beyond the current plan period and as planned housing development comes forward, including in Wymondham, Hethersett and Cringleford. This would allow appropriate long term decisions to be made about the location of new housing having regard to the planning of school places (and vice versa). This is a further matter which justifies an early review of the plan, particularly given the potentially lengthy lead in times necessary to plan for additional school places, should they be needed.**

3.10 Whilst the lack of education capacity is, in itself not a valid reason for refusal (as confirmed at the Appeal relating to the Wymondham Rugby Club, Land West of Elm Farm Business Park and Land North of Carpenters Barn, Wymondham (ref. APP/L2630/W/3007004, 08 September 2016)), the continued lack of positively addressing the secondary education capacity in Wymondham (or the wider South Norfolk area) is creating both a short term problem and exacerbating pressure on the existing school infrastructure.

3.11 As a result, the lack of school places is at odds with the requirement of paragraph 20 of the emerging NPPF which identifies education as a strategic policy required for each authority to plan for.

3.12 It is therefore vital that the emerging plan acknowledges the severity of the education capacity issue, in Wymondham as a strategic priority for resolution.

3.13 Following submission of the March 2018 representations, the Promoters met with Education Authority (Norfolk County Council) to better understand how the Site could deliver a suitable solution to the education capacity issue. This confirmed there is unlikely to be sufficient growth or funding to justify a new secondary school and instead the preferred strategy was to expand Wymondham High.

3.14 As acknowledged in the Wymondham Area Action Plan, Wymondham High's site is constrained. To enable it to expand the school is looking to relocate its Sixth Form off-site. This would release sufficient capacity to address the existing secondary education capacity constraint and allow further growth to be accommodated.

- 3.15 The GNLP should acknowledge and seek to resolve this infrastructure constraint through delivery of a new Sixth Form, which can be delivered on the promoters land at NE Wymondham.
- 3.16 Should the proposed plan fail to adequately deal with this matter it risks being found unsound on the basis it will not be positively prepared, be unjustified and inconsistent with national policy.

## 4.0 SUITABILITY OF LAND AT NORTH EAST WYMONDHAM

- 4.1 Land at North East Wymondham (the Site) has been promoted through previous plans, including the Joint Core Strategy and Wymondham Area Action Plan. The Site area (**Appendix 1**) has been updated to reflect the land under the control of the Promoters. It has been identified as a 'reasonable' site by the Authorities and was not dismissed as inappropriate for development.
- 4.2 The Site represents a sustainable location for development which can deliver sustainable growth which will complement and enhance the existing and committed developments in North East Wymondham, creating a new community heart with a local centre in walking and cycling distance of approximately 1,500 homes alongside delivering a solution to Wymondham's primary and further education capacity constraints.
- 4.3 As identified throughout these representations, Wymondham is a key settlement located within the Cambridge Norwich Growth Corridor and within the Norwich Policy Area and SHMA Core Area. The GNLP should be seeking to deliver growth to these areas (and Wymondham) to ensure it achieves its Vision and Objectives.
- 4.4 The Site comprises circa 60 hectares of mainly agricultural land, extending from Norwich Common in the south to Tuttle Lane in the north, adjoining existing and committed residential and leisure development in North East Wymondham. In the main, the site is located outside the designated Hethersett – Wymondham Strategic Gap, with the exception of an area east of the site (identified for open space).
- 4.5 The Promoters are in the process of preparing an Outline application for the Site, due to be submitted in Spring 2020, which will be supported by a full suite of technical and environmental reports (including an Environment Statement) demonstrating the suitability of the site for development.
- 4.6 The emerging Illustrative Masterplan for the Site is included in **Appendix 5** demonstrating the site's context within its surroundings, including reflecting the planning permissions granted for residential and other development adjoining the site.

- 4.7 As demonstrated on the Masterplan, the development seeks to deliver:
- 650 new homes, including 33% affordable housing;
  - A Local Centre (accommodating up to 1,950sqm floorspace with potential for A1 – A5 and D1 uses);
  - Land for a 2-form entry primary school;
  - Land for the relocation of Wymondham High’s Sixth Form; and
  - Significant areas of open space including the creation of a new Country Park.
- 4.8 The delivery of a new Sixth Form site in Wymondham is a strategically important matter. Therefore, the provision of land to enable this within the Site is considered to be a substantial benefit that the scheme can deliver, thus providing a solution to the persistent education constraint which has continued through previous plan-making exercises.
- 4.9 The new Sixth Form site is ideally located on the new Wymondham Hethersett cycle route located along the B1172 (Norwich Common), as well as being accessible to the existing bus stops along this road and the proposed route of the Bus Rapid Transit service from Wymondham Railway Station to Norwich.
- 4.10 The Site would enable the delivery of ‘Kett’s Oak Common’ a new Country Park located to the east of Wymondham and an accessible location to Hethersett. This has the dual purpose of enhancing the seeking of the historic Kett’s Oak tree and improving public accessible and recreational opportunities to the countryside, a key policy objective (WYM 9) of the Wymondham Area Action Plan.
- 4.11 A Preliminary Vision Document has been prepared (**Appendix 6**) which demonstrates how development on the Site would assist in enhancing the new community in North East Wymondham by providing much needed day-to-day services.
- 4.12 The remainder of this section summarises the technical and environmental work being undertaken to support the emerging planning application for the Site which demonstrate it is wholly suitable for development.
- i) Landscape and Visual**
- 4.13 A Landscape and Visual Impact Assessment has been undertaken assessing likely significant effects of the proposed development on the environment in respect of landscape and views.

- 4.14 The Assessment concludes that whilst the Site would change in character, the key landscape features would be retained, maintaining a physical and visual enclosure of substantial vegetation which contains potential visual effects. The impact of the development would further be minimised through the implementation of a landscape strategy to reinforce and enhance existing landscape features and deliver a framework of cohesive open space.
- 4.15 Visibility from surrounding areas towards the Site is relatively limited by existing vegetation and the relatively flat topography. Views will be restricted to a limited number of receptors in close proximity to the Site, with longer range views heavily curtailed.
- 4.16 Given the limited public viewpoints from within surrounding areas of countryside and the limited contribution of the Site with regard to the landscape setting, the Development is considered to avoid any significant harm to the character of the wider landscape. None of the landscape effects identified would be unacceptable in landscape or visual terms.
- 4.17 Furthermore, the proposed country park would ensure that the gap between the settlements of Wymondham and Hethersett would remain in open in perpetuity and would secure a significant area for community use where the increased levels of publicly accessible greenspace would increase the opportunities for access to historic landscape elements as well as recreation.

**ii) Traffic and Transport**

- 4.18 A Transport Assessment is being prepared to assess existing and proposed highway infrastructure in the vicinity of the Site, including detailed traffic surveys on the local highway network undertaken in June 2019, and provide a review of local walking, cycling and public transport infrastructure.
- 4.19 The anticipate development-generated traffic has be tested on the local highway network at a future time year assessment of 2029, along with allowances for consented developments in the area. With the introduction of mitigation measures proposed at Tuttlles Lane roundabout, the local highway network was found to continue to operate in a satisfactory manner.
- 4.20 A review of local highway safety found no significant issues at locations where improvements to the local network were not already being made. The development is therefore unlikely to give rise to any significant safety issues on the local highway network.

- 4.21 Furthermore, there are good pedestrian, cycle and public transport links between the Site and existing services and facilities in Wymondham. The majority of key facilities within Wymondham can be reached by either walking or cycling from the Site, and more distant facilities can be reached by public transport which is readily accessible along the B1172, or by rail.
- 4.22 The Site is therefore considered wholly appropriate for the proposed development in this respect.
- 4.23 To encourage the take up of more sustainable modes of travel for journeys a Residential Travel Plan will be prepared seeking to influence travel behaviour of occupants of the development through a range of measures aimed at reducing reliance on private car, particularly for single occupancy trips.
- 4.24 The Residential Travel Plan will include indicative targets against which success will be assessed against. Through updating, evolution and annual monitoring, the Travel Plan will remain a relevant and active process. A Travel Plan commitment will be made to ensure funded from commencement until the completion of 'year 5' monitoring surveys.

**iii) Flood Risk and Drainage**

- 4.25 A Flood Risk Assessment and Drainage Strategy is being prepared to support the forthcoming application and provide a review of flood risk implications for the site, foul drainage requirements and any proposed mitigation necessary for the development.
- 4.26 The Site is located within Flood Zone 1, defined as an area with 'low' risk, having a less than 1 in 1,000 annual probability of river (fluvial) or sea (tidal) flooding. The Site is therefore considered to be at a low risk of fluvial/tidal flooding.
- 4.27 The majority of the Site is at 'very low' risk of surface water flooding from extreme rainfall (less than 1 in 1,000 annual probability). There are some small areas of surface water flood risk within the Site, mainly along field boundaries. No dwellings or attenuation basins are proposed to be identified in areas at risk for surface water flood and all dwellings close to these areas will be raised above ground level as appropriate. The risk of flooding from all sources is considered to be low.



- 4.28 The proposed development will include a surface water drainage strategy ensuring that runoff from the Site is managed. The strategy will include the use of SUDS features to ensure flows from the Site are restricted (within a 40% allowance for climate change) prior to discharge into the existing site boundary ditches. Development on Site will therefore not increase the risk of flooding in other areas surrounding it.
- 4.29 In respect of foul drainage, the Site is designed to drainage via gravity to a foul water pumping station to the north of the Site. This will subsequently pump flows to a connection in either Norwich Common or to the junction of Melton Road and Tuttle's Lane. Foul Water will be accommodated within the Anglian Water network, alongside any necessary offsite upgrades required to support this.

#### **iv) Ecology**

- 4.30 An Baseline Ecological Assessment has been undertaken, including a desktop and on-site survey to establish existing ecological interest of the Site. The Site was surveyed in June 2019 to update those previously undertaken, alongside more detailed surveys for a number of protected species.
- 4.31 There are no statutory or non-statutory nature conservation designations present within or immediately adjacent to the Site, with the nearest designation being the non-statutory Melton Road Meadow County Wildlife Site, approximately 50m to the north-west.
- 4.32 The results of the survey work for the Site demonstrates it is dominated by arable habitat not considered to be of ecological importance, with woodland, trees, ponds and hedgerows considered to be of importance at the local level.
- 4.33 Habitats within the Site have potential to support a number of protected species including bats, breeding birds and invertebrates. Further, the presence of Great Crested Newt has been confirmed in an off-site pond in close proximity to the Site.
- 4.34 Mitigation and enhancement measures will be employed across the Site including construction safeguards to ensure the proposed development complies with relevant legislation and planning policy and avoid any significant effects in relation to habitats of ecological importance.
- 4.35 The Development would result in an overall gain in the existing ecological interest supported by the site, with significant benefits anticipated in respect of habitats, bat species, birds, invertebrates, reptiles and Great Crested Newt. Proposed enhancements will also deliver

significant benefits in terms of green infrastructure, providing an extensive network of green links and corridors through and around the Site.

**v) Built Heritage and Archaeology**

4.36 A Cultural Heritage Desk-Based Assessment has been undertaken to review potential heritage constraints to the proposed development.

4.37 In respect of Built Heritage, there are no designated assets located within the Site or the immediate area. Furthermore, the Site is not located within the vicinity of a Conservation Area.

4.38 The proposed development would therefore have a 'neutral' impact upon the significance of any built heritage assets in the surrounding area. No built heritage specific mitigation is required in this instance.

4.39 In respect of archaeological assets, no Scheduled Monuments, World Heritage Sites, Historic Battlefield Sites or Historic Wreck Sites lie within the immediate vicinity of the Site. Past archaeological investigations within the immediate vicinity of the Site have identified archaeological evidence of low (local) significance only.

4.40 A geophysical survey of the Site has taken place confirming there to be no features of likely archaeological interest.

4.41 It is anticipated no further work is necessary to inform a planning application in respect of the proposed development however proportionate targeted archaeological investigation (trial trenching) can be undertaken post-consent secured by an appropriately worded planning condition.

**vi) Air Quality**

4.42 An Air Quality Assessment has been undertaken to inform the proposed development for the Site to consider potential air quality impacts associated with both construction and operation.

4.43 Modelling work completed to date confirms pollutant levels at sensitive locations across the Site are below relevant Air Quality Objectives. The location is therefore considered suitable for development without the need for mitigation measures to protect future users from poor air quality.

- 4.44 Development has potential to cause air quality impacts, for example from dust emissions from construction works and road vehicles exhausts and energy emissions from the operation of the development
- 4.45 During construction, good practice dust control measures will be implemented to ensure there is negligible significance of potential air quality impacts arising from dust generated by earthworks, construction and other activities.
- 4.46 Air quality impacts as a result of operational phase exhaust emissions are predicted to be negligible at all sensitive receptor locations considered. However, good practice measures will be implemented to ensure a clean and safe air for future users of the Site, including potential for EV Charging Points and use of a Travel Plan.
- 4.47 The overall significance of potential impacts was therefore determined to be not significant, in accordance with the EPUK and IAQM guidance.

**vii) Utilities**

- 4.48 Utilities work completed to date, including pre-application engagement with relevant providers, has confirmed there are feasible and achievable connections to the Site in regard to water, electricity, gas and telecommunications.
- 4.49 A further stage of Utility Assessment will be undertaken as the scheme progresses to detailed design.

**viii) Energy**

- 4.50 An Energy Statement is under preparation to support the emerging application and to set out a energy strategy for the Site. Alongside adopted policies, the strategy will address future and emerging policies likely to have an impact on development for throughout construction phases, in particular zero carbon, or near zero carbon.
- 4.51 At its core, the strategy will incorporate the reduction of energy use through effective energy efficiency measures and efficient servicing solutions. The specification of energy saving features within the services design will lead to a significant reduction in anticipated energy consumption and CO2 emissions compared to a standard development.

- 4.52 The most suitable low and zero carbon technologies have been reviewed for potential integration into the proposed development. It is highly likely that there will be a move away from technologies such as conventional gas boilers and CHP towards electric solutions such as heat pumps.
- 4.53 The strategy will be developed further as the scheme progressed to detailed design; however it is envisaged the development would holistically incorporate sustainable principles into the full range of sustainability aspects covered by relevant policy requirements relating to energy conservation and carbon emissions reduction.

**ix) Contamination**

- 4.54 A Contamination Land Assessment is being completed to support the forthcoming application and review potential contamination constraints on the Site and in the surrounding area.
- 4.55 The Site is predominately arable farmland however there are a number of potential contamination sources associated with historic and current uses of the Site and uses in the surrounding area including potentially infilled ponds within the Site boundary, potential for presence of made ground, and a former filling station to the east of the Site. The potential presence of contamination is considered to pose a moderate/low risk to future residential uses.
- 4.56 Further limited investigations are recommended to inform detailed design of the proposed development and any remedial action necessary to mitigate risks. These are not required pre-determination of any application and can be secured by an appropriately worded condition.

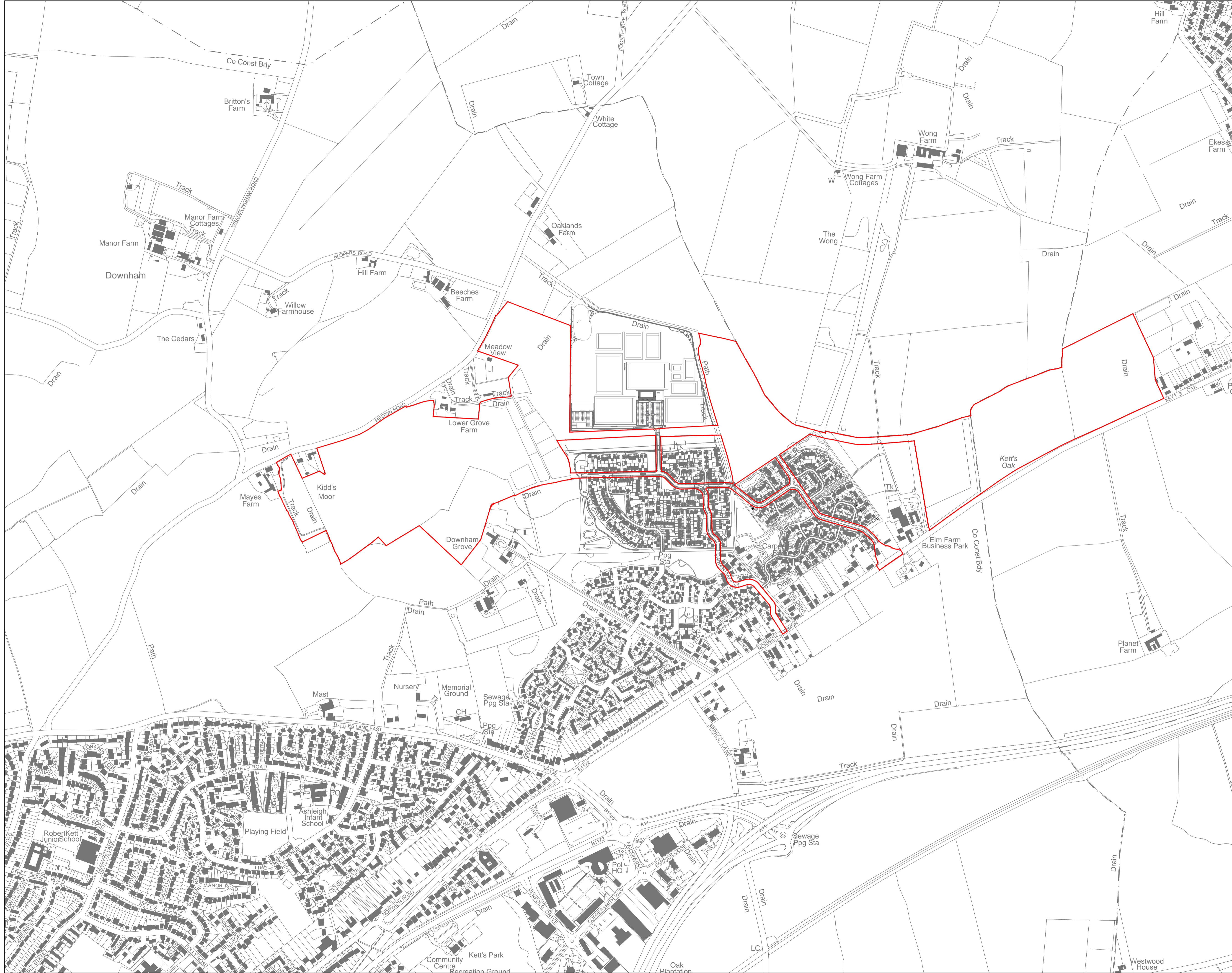
**x) Noise and Vibration**

- 4.57 To review potential acoustical environmental constraints associated with the Site and noise and vibration arising from construction on surrounding sensitive uses, a Noise and Vibration Impact Assessment is being prepared to support the forthcoming application.
- 4.58 The results of the acoustic survey completed to date demonstrates suitable internal sound levels would be achievable across the Site, in line with World Health Organisation requirements.
- 4.59 Furthermore, the construction phase has been assessed and the noise and vibration impacts have been shown to be Negligible and Not Significant, with best practice methods being employed during construction.

- 4.60 Operational noise has also been assessed in terms of increased road traffic and plant noise, demonstrating the impact to be Negligible and Not Significant following implementation of proposed mitigation.
- 4.61 A more concise plant noise impact assessment can be undertaken at detailed design stage once plant selection has been confirmed.
- 4.62 The proposed development, either on its own or cumulatively with other developments in the locality, would not result in any significant noise or vibration impacts.
- 4.63 As detailed throughout this section, the Site is deliverable, providing an appropriate location for growth which will help the GNLP achieve its Visions and Objectives. The site is considered to be sustainable and located in proximity to existing services and facilities. As such, it is considered a suitable site to be allocated in the GNLP.

**APPENDIX 1**  
**SITE LOCATION PLAN**

Application Site Boundary  
 (59.87Ha / 147.94Ac)



Project  
**NORTH EAST WYMONDHAM**

Drawing Title  
**Site Boundary Pan**

Date	Scale	Drawn by	Check by
08.03.19	1:5000@A1	SG	VA
Project No	Drawing No	Revision	
29704	RG-M-15	L	

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## **APPENDIX 2**

### **MARCH 2018 CONSULTATION REPS**



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# GREATER NORWICH LOCAL PLAN

## REGULATION 18 CONSULTATION

### GROWTH OPTIONS

Representations Submitted on Behalf of  
Landstock Estates Limited and Landowners Group Limited

March 2018

**GREATER NORWICH LOCAL PLAN**  
**REGULATION 18 CONSULTATION**  
**GROWTH OPTIONS**  
**REPRESENTATIONS SUBMITTED ON BEHALF OF**  
**LANDSTOCK ESTATES LIMITED AND LANDOWNERS GROUP LTD**  
**March 2018**

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## APPENDICES

**APPENDIX 1: Illustrative Site Masterplan**

**APPENDIX 2: Annual Monitoring Report 2016 – 17 – Appendix A (March 2018)**

**APPENDIX 3: Greater Norwich Technical Report – Economic Geography (Barton Willmore, March 2018)**

## 1.0 INTRODUCTION

1.1 These representations are submitted on behalf of Landstock Estates Ltd and Landowners Group Ltd (the Promoters) in response to the Greater Norwich Growth Board (GNGB) consultation on the Greater Norwich Local Plan (GNLP) Regulation 18 Consultation. The consultation comprises the following documents, with no single overarching 'plan' for review:

- Site Proposals consultation document (SPCD);
- Growth Options consultation document (GOCD);
- Interim Sustainability Appraisal; and
- The Evidence Base, including the Strategic Housing Market Assessment (SHMA), Housing and Economic Land Availability Assessment (HELAA) and New Settlements Topic Paper.

1.2 The Promoters have land interests in North East Wymondham (circa 160ha) (**Appendix 1**) which forms part of a larger site previously promoted (HELAA Ref. GNLP0525) through the adopted Joint Core Strategy (2013), South Norfolk Site Specific Allocations and Policies Document (2015), South Norfolk Development Management Policies Document (2015) and the Wymondham Area Action Plan (2015).

1.3 In recent years, a number of applications/appeals have been granted/allowed within the previously promoted site area amounting to circa 1,430 dwellings (and as shown in Appendix 1). These parcels no longer form part of the site now being promoted, albeit they have been brought forward in a coordinated fashion to facilitate potential future allocation of land including access rights, vehicle linkages and green spaces.

1.4 Notwithstanding specific land interests, these representations have been prepared in objective terms and assessed against the prevailing planning policy and guidance framework set out within the National Planning Policy Framework (NPPF) (March 2012) and National Planning Policy Guidance (PPG) (March 2014). In addition, the emerging amendments to the NPPF (presently out for consultation) have been taken into account.

### i) National Planning Policy Framework

1.5 The NPPF, published in March 2012, put the 'presumption in favour of sustainable development' at the forefront of planning, to be seen as the 'golden thread' running through both plan making and decision taking (para 14).

- 1.6 Para 15 confirms that 'policies in Local Plan should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay'.
- 1.7 As detailed in Para 47, in seeking to ensure a 'presumption in favour of sustainable development' is achieved, local planning authorities should, among other things, 'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period'.
- 1.8 Paragraphs 150 – 185 regard Plan Making. Para 151 confirms that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development.
- 1.9 Para 178 refers to the 'duty to cooperate', requiring authorities to seek agreement on cross administrative boundary planning issues, particularly those relating to the strategic policies in Para 156, including the homes and jobs needed in an area. Further, para 178 notes an expectation on authorities to demonstrate joint working on areas of common interest, for the mutual benefit of neighbouring authorities.
- 1.10 As detailed in Para 182, Local Plans will only be considered 'sound' where they are:
- **Positively prepared** – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
  - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
  - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
  - **Consistent with national policy.**
- ii) **Proposed Amendments to the National Planning Policy Framework**
- 1.11 An amended version of the National Planning Policy Framework is currently being consulted, with the draft text for consultation being published on 05 March 2018. The draft incorporates proposed amendments arising from the Housing White Paper (February 2017) to 'fix the housing market', as well as incorporating the proposed Standardised Housing Needs methodology, as detailed in the Planning for the Right Homes in the Right Places consultation (September 2017).

- 1.12 The revised text, as currently published, re-iterates the requirement for sustainable development to be pursued in a positive way, with the heart of the framework being the presumption in favour of sustainable development (para 10).
- 1.13 In respect of plan-making, the tests of soundness remain, albeit amended and plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (para 11).
- 1.14 Plan-making has been brought forward to the front of the Framework, now forming Section 3. As confirmed in para 15, the planning system should be genuinely plan-led, with succinct and up-to-date plans providing a positive vision for the future of an area, addressing housing needs and other economic, social and environmental priorities.
- 1.15 Paragraphs 20 – 25 regard the strategic policies/priorities of the plan, confirming that authorities should include relevant strategic policies for, and any necessary strategic site allocations to deliver:
- An overall strategy for the pattern and scale of development;
  - The homes and workplaces needed, including affordable housing;
  - Appropriate retail, leisure and other commercial activity;
  - Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - Community facilities (such as health, education and cultural infrastructure); and
  - Climate change mitigation and adaptation, and conservation and enhancement of the natural built and historic environment, including landscape and green infrastructure.
- 1.16 Strategic policies should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues) to provide a clear starting point for any local policies that may be needed (para 21). Furthermore, strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities (para 22).
- 1.17 Paragraph 36 confirms plans are to continue to be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound (on the basis of them being positively prepared, justified, effective and consistent with national policy). These tests of soundness will be applied to local policies in a proportionate way taking into account the extent to which they are consistent with relevant strategic policies for the area (para 37).

### iii) Summary of Representations

1.18 These representations respond to the content of the GNLP Regulation 18 consultation, with reference where applicable to relevant policy, consultation documents and the evidence base. We reserve the right to comment on wider matters in future consultations.

1.19 The Regulation 18 consultation sets out 6No. potential 'Growth Options' for the GNLP. It is recognised at this stage that the options represent a range of suitable alternatives to be considered by the GNGB, but the Regulation 18 consultation is lacking in an appropriate and proportionate evidence base (such as Education matters) to form a view as to the most appropriate strategy. Further iterations of the plan need to rectify this otherwise the plan would not be **Justified** or **Positively Prepared**.

1.20 In summary, our representations demonstrate:

- The GNLP is required to allocate land for 7,200 new dwellings, incorporating the proposed Standardised Methodology as the OAN starting point, plus a 10% buffer. This is **positively prepared**;
- The proposed expansion of the existing Norwich Urban Area to include lower tier settlements outside the continuous urban area is **inconsistent with national policy**;
- The SHMA demonstrates that a 'Core Area' exists that represents the strongest functional connection to the Norwich Urban Area. Evidence, reviewing the functional economic relationships within the Greater Norwich Area, has been prepared and supports the continued recognition of an area, akin to the existing Norwich Policy Area, to focus growth. A policy should be prepared to that effect;
- The proposed removal of a Core Policy Area (i.e. NPA) results in all the growth options failing to suitably consider the influence of the 'Core Area' and therefore the area with the strongest functional relationship to Norwich. **It is not effective**;
- It is recognised that some options focus growth as an Urban Concentration, but this would not address the wider plan objectives. It is proposed that *a combination of the growth options 2 and 3 is considered*;
- These representations present evidence which demonstrates the strength of the A11 corridor and that Wymondham, as a Main Town can play a critical role and support more growth than presently identified. This includes the delivery of specific infrastructure to address the South West sector;
- Focusing growth within the Cambridge Norwich Tech Corridor is vital to meet the plan's Visions and Objectives and promote economic growth to meet the City Deal aspirations;

- It is vital the GNLP acknowledges the severity of the education capacity issue in Wymondham and the south-west sector and identifies this as a strategic priority for resolution; and
- The promoted site, at Land at North East Wymondham, is deliverable, providing a sustainable location for growth which can, crucially, provide a solution to the education capacity issue, subject to sufficient growth being allocated.

1.21 A summary of our response to questions contained within the GOCD, as well as other responses to specific GOCD proposals, is shown below in table 1.1.

**Table 1.1 – GOCD response summary**

	<b>Support/Object/Comment</b>	<b>Soundness Reason</b>	<b>Summary</b>
<b>Question 2</b>	Support	-	We support the broad objectives and policy headings listed. Certain Growth Options will need to be pursued (i.e. Options 2 and/or 3) to ensure these objectives are met. Places such as Wymondham are critical in this respect.
<b>Question 3</b>	Comment	-	We support Option JT1.
<b>Question 4</b>	Support	-	The GOCD correctly identifies the Government's proposed standardised methodology as the starting point.
<b>Question 5</b>	Support	-	A 10% buffer will support delivery to achieve social and economic growth, provided the distribution of allocation is appropriate.
<b>Question 6</b>	Support	-	Provision of windfall development 'in addition' to housing requirement is consistent with the context of the NPPF and reflects the GNGB 'pro-growth' agenda.
<b>Question 7</b>	Comment	-	The proposed scale of development will require provision of new infrastructure, including those which have not been addressed



	<b>Support/Object/ Comment</b>	<b>Soundness Reason</b>	<b>Summary</b>
			through previous plan making exercises (i.e. Secondary Education capacity in the South West sector).
<b>Question 8</b>	Comment	-	There is clear evidence that delivery rates in the Joint Core Strategy Area have never been met. The collective failure of the Joint Core Strategy's planned allocations represent a real risk that existing commitments will not be fully delivered by 2036. In this respect, it will be critical that the GNGB selects deliverable sites in suitable locations, Wymondham is such a location.
<b>Question 9</b>	Comment	Option 1, 4 – 6 result in a plan which is ineffective / unjustified / not positively prepared	Option 2 has a number of merits and is a favoured option, however the overall distribution risks delivering unsustainable development towards Diss and allocations in locations that have a history of not delivering. Option 3 is a favoured option, however the proposed distribution is presently inappropriate.
<b>Question 11</b>	Comment	-	A hybrid version of Options 2 and 3 should come forward as a preferred option, serving to ensure a 'Core Area' is supporting while focusing development along the A11 corridor. Evidence has been prepared to demonstrate the continued importance of the NPA/Core Area for directing growth and confirms the most appropriate strategy for growth will include

	Support/Object/ Comment	Soundness Reason	Summary
			necessary measures to realise the full economic and social benefits of the Cambridge Norwich Tech Corridor. Table 4.2 proposes an appropriate dispersal to achieve this and elevates the role of Wymondham. The allocation of sufficient growth in Wymondham will also resolve the strategically important Secondary Education capacity issue.
<b>Question 12</b>	Object	The delivery of a new settlement is not justified or considered effective	The delivery of a new settlement could be a suitable long-term aspiration of the plan, however its delivery is risky and unpredictable and therefore should not be relied upon in the current plan period. Further, sufficient suitable and deliverable land, adjoining existing sustainable settlements, has been identified, and therefore it is not considered necessary for a new settlement to be relied upon at this time.
<b>Question 26</b>	Support	The removal of a policy directing growth to a suitable area risks the Plan being found not effective	Without a policy area focusing growth in key locations there are risks the strategy will fail. We strongly urge the GNLP to continue the approach set by the NPA in directing growth to a defined area with the strongest functional relationship to Norwich (with NPA or similar distinction). Evidence provided as part of these representations demonstrates the NPA remains a relevant area to

	<b>Support/Object/ Comment</b>	<b>Soundness Reason</b>	<b>Summary</b>
			direct growth, given its continued high degree of self-containment.
<b>Growth Options - Baseline</b>	General Comment / Objection	The current approach is unjustified	No evidence is presented which supports the baseline proposed. The current distribution suggests a predetermined strategy which is inappropriate and disproportionate.
<b>Growth Options – Settlement Hierarchy</b>	General Comment / Objection	The current approach is unjustified and inconsistent with national policy	The proposed extension of the Fringe Area to include Hethersett (among others) inappropriately elevates less-sustainable locations in the Settlement Hierarchy.

## 2.0 HOUSING NUMBERS

**Q4) Do you agree that the OAN for 2017 – 2036 is around 39,000 homes.**

2.1 Yes. The Government's proposed standardised methodology for Greater Norwich requires the delivery of 2,052 dwellings per annum, or a requirement of 38,988 dwellings across the plan period (2017 to 2036). The Growth Options consultation document (GOCD) correctly identifies this as the starting point for calculating the housing requirement for the plan (para 4.18).

**Q5) Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?**

2.2 Yes. Para 4.20 – 4.21 of the GOCD confirms the GNLP will seek to over-allocate by means of a 10% buffer to maximise the potential delivery and ensuring housing is delivered to tackle the housing shortage and support economic growth. The 10% buffer, equating to a total of 3,899 dwellings would include the additional 1,700 dwellings identified to meet the City Deal and results in a remaining additional 2,199 dwellings to be allocated. This takes the total housing requirement to 42,887 and the need to identify 7,200 new allocations.

2.3 Section 4 of the GOCD confirms one of the key aims of the GNLP will be to drive economic growth across the plan period by delivering an increase on forecast growth in jobs and productivity. This is a reflection of the aims and aspirations of the Greater Norwich City Deal which covers the GNLP area and is being delivered by the Greater Norwich Growth Board (GNGB).

2.4 The City Deal, which was signed into effect by the Government in December 2013, gives Greater Norwich increased freedom to help business grow and create economic growth. As detailed in the City Deal report (December 2013), the deal aims to bring an additional 13,000 jobs and 3,000 homes (above Joint Core Strategy requirements) to the Greater Norwich Area. As detailed in the Central Norfolk Strategic Housing Market Assessment (June 2017) this equates to a total of 45,390 jobs over the plan period. **In this respect, we support Option JT1 as identified in Question 3.**

2.5 This approach will help support delivery to achieve social and economic growth, provided that the distribution of these new allocations is appropriate.

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

- 2.6 Yes. To ensure the GNLP provides sufficient flexibility to enable growth to come forward, the GOCD proposes windfall development be 'in addition' to the housing requirement. This is consistent with the context of the NPPF (including the emerging NPPF).
- 2.7 Given the lack of delivery in the Joint Core Strategy area, there is a particular need to ensure a strong emphasis on boosting housing supply. In this respect, the current Joint Core Strategy provides an 'at least' housing target. In the light of the intention to rely on so many additional windfall dwellings (5,600 dwellings) to introduce the flexibility, the plan should reflect that the 42,887 target is an at least figure with the housing requirement figure not being a ceiling. This would support the GNGB 'pro-growth' agenda.
- 2.8 While anticipated windfall development will go some way to delivering additional housing, the scale of the windfall figure could have an impact on local infrastructure and services. It is therefore recommended that the GNGB undertake an appropriate evidence base (i.e. SEA/SA) on a total housing figure of **48,487 dwellings**.

**Q7) Are there any infrastructure requirements needed to support the overall scale of growth.**

- 2.9 Yes. The scale of development will clearly require the provision of new infrastructure to appropriately and sustainably meet the demands of this growth. There are key pieces of infrastructure that are necessary to be addressed that have otherwise not been delivered or proposed to be delivered as part of the Joint Core Strategy 2013. A good example, and as detailed further below, is the need to positively address the Secondary Education capacity in the South West sector and specifically in Wymondham. This is an issue that has been highlighted by the Inspector examining the Wymondham Area Action Plan as being "necessary to review" as part of future plan-making exercises.

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

- 2.10 Yes. At the mid-point of the Joint Core Strategy plan period (01 April 2017), there is clear evidence that the delivery rates in the Joint Core Strategy Area have never been met (see Annual Monitoring Report 2016 – 17, March 2018, Appendix A ). There is at present a deficit of 4,957 dwellings (of a midpoint cumulative requirement of 18,414) from the start of the

plan period (2008/09) to the most recent monitoring year (2016/17) (collective failure) across the plan area as a whole. The deficit within the NPA is even higher at 6,493 dwellings during the same period.

- 2.11 Whilst it is recognised that there are external factors that can affect delivery, the collective failure of the Joint Core Strategy's planned allocations in not meeting the target represents a real risk that the existing commitments will not be fully delivered by 2036.
- 2.12 Within the NPA, the forward 5-year annual completion rate to meet the Joint Core Strategy minimum target level, including the required 20% buffer, is now in the range of 3,056 to 3,748 dpa (double the planned rate), with the Annual Monitoring Report 2016-17 conceding the requirement in the 5-year period 2017 – 2022 will fall short by up to 4,650 dwellings.
- 2.13 In this respect, it will be critical that the GNGB selects deliverable sites in suitable locations. As detailed in Section 1, the Promoters have successfully secured consents resulting in some 800 dwellings being completed in Wymondham over the past 12 years from previously unidentified sites. This reflects not only the suitability of Wymondham as an appropriate location (i.e. people want to live there) but also represents a proven and trusted track record for the Promoters in bringing forward suitable sites where people want to live. This is a material consideration in determining the suitability of sites coming forward. Additionally, it should be noted that the land being promoted lies adjacent to the existing urban area including new development. As such, utilities and services are being actively delivered and this brings with it advantages compared to the creation of say, a new garden Village which will require substantial upgrades to existing infrastructure and significant new infrastructure.
- 2.14 The new annual target for 2017 – 2036 (assuming 42,887 dwellings) across the entire plan area will represent an annual requirement of 2,257dpa. This equates to 11,286 dwellings in any given 5-year period and **assumes** that the current deficit (in excess of 6,400 dwellings) is 'wiped clean'. This could potentially give the impression that 'all is well' and the failure to meet past targets is simply forgotten.

### 3.0 SPATIAL OPTIONS

#### Q2) Do you support the broad strategic approach to delivering jobs, homes and infrastructure

3.1 Yes. Para 4.1 of the GOCD confirms delivery is key to the success of the plan. To realise this, and to successfully achieve the Visions and Objectives of the plan, the document identifies 6no. policy headings which will be included in the GNLP. These are:

- Support the economy through infrastructure investment, environmental enhancement and quality of life improvements;
- Enable development of the strategic employment locations in the city centre, the Norwich Airport area, Broadland Business Park/Broadland Gate, NRP, Wymondham/Hethel, Longwater and the Food Enterprise Zone;
- Promote the Cambridge Norwich Tech Corridor growth initiative;
- Promote inclusive growth and social sustainability;
- Provide for local employment close to where people live;
- Support a thriving rural economy.

3.2 We support the broad objectives and the policy headings detailed above. We note that if these objectives are to be met, there is a need to ensure that certain Growth Options are pursued i.e. Growth options 2 and/or 3. These options focus growth in the above stated location specific areas (i.e. locations along the A11 corridor and others) as well as being able to achieve the other stated non location specific objectives. Places such as Wymondham are critical in this respect.

## 4.0 THE GROWTH OPTIONS

### i) The Base Line

- 4.1 The GOCD presents 6no. 'alternatives' each identifying a different approach to the distribution of growth.
- 4.2 The 6 options are all predicated on a base line position that 3,900 dwellings have already been distributed to certain locations. Of this, 1,700 dwellings have been cited to be delivered in Norwich City. It is assumed that this reflects the additional dwellings necessary to deliver the City Deal, and therefore is broadly acceptable.
- 4.3 However, the remaining 2,200 dwellings have been spread across various settlements. This suggests that a predetermination of the strategy (in part) has already taken place. This is not appropriate as up to 1,000 dwellings have been located in service villages and only 550 dwellings in Main Towns. Whilst there are more service villages (and therefore a greater number of dwellings have been spread across those locations), it should be recognised that the net effect is that up to 1,000 dwellings (14% of the total new allocations) are already assigned to service villages before the main strategy has been set. This is disproportionate and would in fact double the existing commitments of the service villages.
- 4.4 There is no evidence presented that supports the above baseline of spreading the 2,200 dwellings and we recommend that the base line should only apply to 1,700 dwellings in Norwich City.

### ii) The Ranking of Locations Outside of the Settlement Hierarchy

- 4.5 The 6No. options are all accompanied by supporting tables which seek to place locations in sustainability order from Norwich City, to Fringe Sectors to Main Towns and so on. Whilst it is necessary to prepare such a hierarchy, it is noted that the designation of 'Fringe Sectors' includes some locations which are, in their own right, not as sustainable as locations which are further from Norwich City but larger in scale. A good comparison is the relationship of Hethersett (a Key Service Centre and identified in the Fringe Sector) and Wymondham, some 1.5km (from New Road to Elm Farm Business Park, i.e. the development boundary edges) to the southwest (a Main town and not in the Fringe Sector).



- 4.6 The result is that a location that is recognised as being only a Service Centre, is deemed more appropriate for large scale growth simply because the perception that the location is closer to Norwich and therefore by default a more appropriate location to deliver greater growth.
- 4.7 There is no justification for the scale of growth identified in locations such as Hethersett as a fringe location when it is in practice, truly a Key Service Centre and are located beyond the continuous development of Norwich.
- 4.8 As a consequence, the increased status of these locations, in the broad 'Urban Area' definition, risks them receiving a disproportionate level of growth which is not an accurate representation of each settlement's sustainability. This has come through in some of the Options put forward.
- 4.9 Whilst we accept the existing Norwich Urban Area is likely to be suitable for an element of additional growth above existing commitments, the proposed extension of the Fringe Area to include Hethersett is **unjustified** and should be reviewed. The plan risks being found **inconsistent with national policy** if this approach is pursued, with less-sustainable locations elevated in the Settlement Hierarchy. This is not in accordance with Section 39(2) of the Planning and Compulsory Purchase Act 2004 which confirms the plan-making process must exercise the objective of contributing to the achievement of sustainable development.
- 4.10 Whilst the hierarchy is a starting point, it does not determine the scale of development appropriate in a particular settlement. As confirmed in para 4.42 of the GOCD, the scale of development appropriate to a particular settlement will depend on a number of factors including local service, deliverability, location in relation to strategic services and job opportunities, as well as local constraints and opportunities.
- 4.11 The most appropriate strategy for growth will therefore be influenced by a number of key factors, most importantly the opportunities identified to achieve the Visions and Objectives of the plan and the measures enabled to deliver economic, social and environment sustainable development.

**Q9) Which alternative or alternatives do you favour**

- 4.12 **Our favoured Options lean towards Option 2 and/or 3.** This is in part a reflection of the aims and visions identified in the Spatial Options, the evidence presented in these representations and the role Wymondham can play both in its location to the A11 and Norwich, as well as the suitability and deliverability of the site itself.

- 4.13 Para 4.65 of the GOCD acknowledges the chosen strategy may be an amalgamation of the options, with no 'preferred' options identified at this time. We support this recognition (see response to Question 11), but set out our position on each alternative scenario below.
- 4.14 The Interim Sustainability Appraisal assesses each alternative against 15no. sustainability objectives, on the basis of its likely effects. The alternatives have been tested and show that Options 1 -3 score more preferably than options 4 – 6. Of interest to note, the SA shows that Options 4 and 5 score particularly negatively on sustainable transport modes. Options 1 -3 score the same.
- 4.15 The potential distributions, specifically in regards to Main Towns, is as set out below in Table 4.1.

**Table 4.1 – Main Town Distribution (dwellings)**

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6
<b>Baseline</b>	550	550	550	550	550	550
<b>Main Towns</b>	0	1,100	700	650	650	150
<b>Total</b>	550	1,650	1,250	1,200	1,200	700
		Predominately to Wymondham in the A11 corridor and to Diss	Predominately to Wymondham in the A11 corridor	Large majority to Wymondham, Diss and possibly Harleston	Large majority to Wymondham, Diss and possibly Harleston	To Wymondham, Diss and possibly Harleston

### iii) Option 1 – Concentration Close to Norwich

- 4.16 Option 1 seeks to deliver all growth within the confines of the existing urban area fringe sectors, with 1,000 homes being delivered in the north-east, 600 in the north and north-west, 500 in the west and 1,200 in the south-west. There would be no growth, beyond baseline, in other settlements outside this area (including the Main Towns).
- 4.17 The SA suggests this option results in development likely being in close proximity to existing employment opportunities and within easy access to public transport. It therefore scores highly in the Interim Sustainability Appraisal (SA11 and SA12). Option 1 is also identified to provide the best option in regards to reducing carbon emissions, adapting to and mitigating against the effects of climate change.

- 4.18 As confirmed in the Interim Sustainability Appraisal, Option 1 would result in a reliance in a number of large allocations, therefore exposing the plan to long lead-in times. Furthermore, growth would be focused in locations already experiencing significant growth and therefore provide less diversity in the market.
- 4.19 This risk is further exacerbated by the historic under delivery of sites within the north-east of the Urban Fringe (including the Growth Triangle) which leads to doubt as to whether this option would be able to achieve the level of growth intended.
- 4.20 Further, while the option includes an element of growth along the Cambridge Norwich Corridor (within the south-west fringe) this option will fail to deliver the necessary homes along this corridor, in locations close to potential employment opportunities, to fully deliver the economic potential of this key location and undermine the Spatial objectives of the plan.
- 4.21 On this basis, Option 1 is considered to be an inappropriate strategy for growth which would not result in an effective or positively prepared plan. **Option 1 is not supported.**

**iv) Option 2 – Transport Corridors**

- 4.22 Option 2 aims to direct growth along existing transport corridors, specifically the A11, A47 (W), A140 and A1151. The options identifies the following distribution above baseline:
- Fringe Sectors - 2,200 dwellings inc. 1,000 in north-east, 200 in north and north-west, 500 in west and 500 in south-west; and
  - Main Towns - 1,100 dwellings, predominantly in Wymondham in the A11 Corridor and Diss, and possibly including villages on A140 (S), other than Long Stratton.
- 4.23 Option 2 would result in a more 'distributed' form of development, with allocations (above baseline) attributed to key locations along the 'transport corridors'. Thereby ensuring that development would be located within highly accessible locations on existing transport routes. Importantly, the specific identification of the main towns ensures that the development is directed to the most sustainable locations along these corridors.
- 4.24 Option 2 will support the Cambridge Norwich Corridor, with allocation in the south-west Fringe and in Wymondham. We question if Diss, located circa. 20 miles from Norwich, can truly play a role delivering sustainable development when assessed against the spatial objectives of the A11 corridor and the Core Area.

4.25 Furthermore, Option 2 seeks to allocate up to 1,000 dwellings to the north-east of the Urban Fringe. This area already has a substantial number of committed sites or allocations which are not delivering at the rate anticipated. Locating so many dwellings in this area would represent a significant risk of delivering the number of dwellings in the plan period.

4.26 Option 2 has a number of merits and is a **favoured option**, particularly the main role Wymondham can play in this option, but the overall distribution risks deliver unsustainable development towards Diss and the identification of allocations in locations that have a history of not delivering.

**v) Option 3 – Support the Cambridge Norwich Tech Corridor**

4.27 In addition to baseline growth, Option 3 directs allocations to the A11 corridor, supporting the Cambridge Norwich Tech Corridor. The following distribution above baseline is identified:

- Fringe Sectors – 2,000 dwellings inc. 500 in the east (between NRP and Food Enterprise Zone) and 1,500 in the south-west;
- Main Towns – 700 dwellings predominately in Wymondham;
- Key Service Centres – 100 dwellings to Hingham; and
- New Settlement – 500 dwellings, in or near the A11 corridor.

4.28 The Interim Sustainability Appraisal (SA11 Encouraging Economic Development) identifies that this alternative has been specifically derived to support economic growth plans and therefore has further potential benefits (above others) that would result in a housing distribution to support a specific economic growth initiative.

4.29 Despite the focus on the A11 corridor and that Wymondham is the only Main Town on the A11 Corridor, it oddly receives a reduced allocation that Option 2 above. This is in part because the south-west Fringe Area Locations have in our view, been afforded an over-reliance on growth (1,500 dwellings) that is not truly reflective of their sustainability credentials or place in the settlement hierarchy (see response to Q26). Furthermore, Option 3 includes provision of a new settlement, located along the Corridor, which is not considered to be appropriate to be relied upon at this time.

4.30 In its current form, Option 3 is considered to be ineffective as the role of Wymondham has been diluted in favour of less sustainable locations (i.e. Hethersett) or more challenging sites to be delivered (i.e. new settlement).

4.31 **Option 3 is a favoured option** as it is considered appropriate to focus on the A11 corridor. However, the exact split of dwellings across the south-west sector is presently inappropriate and can be remediated through a revised distribution (from south-west fringe and new settlement) to providing additional growth in Wymondham – more akin to the levels in Option 2.

**vi) Option 4 – Dispersal**

4.32 Option 4 provides high level dispersal to villages with only limited growth allocated to the fringe and A11 Corridor, with the following above baseline:

- Fringe Sectors – 350 dwellings inc. 100 in north and north-west, 100 in west and 150 in south-west;
- Main Towns – 650 dwellings mainly to Wymondham, Diss and possibly Harleston;
- Key Service Centres – 400 dwellings majority to those in South Norfolk; and
- Other – 1,900 dwellings to villages dependent on a range of factors including availability of sites, location, access to services and deliverability.

4.33 The option scores poorly, in the Interim Sustainability Appraisal, in regards to potential impacts on air, noise and light pollution (SA1), the protection and enhancement of biodiversity and geodiversity assets (SA3) and reducing the need to travel and promote the use of sustainable transport modes (SA12), with a 'likely significant negative effect' in all these regards. The option performs less well (likely positive effect) than Options 1 – 3 (likely significant positive effect) in regards to the encouragement of economic development (SA11).

4.34 Option 4 seeks to distribute a significant level of growth to areas outside of the 'Core Area' and settlements lower down the settlement hierarchy, and therefore by nature less sustainable. As acknowledged in the Interim Sustainability Appraisal, this option would result in the 'least preferential' relationship to the focus of jobs, facilities, services and sustainable transport options near to Norwich.

4.35 Furthermore, the distribution of Option 4 is largely unknown, with a significant proportion to be 'dependent on a range of factors'. As such it is currently not possible to consider, in detail, the potential sustainability impacts (or benefits). This is a significant risk which cannot be properly assessed this time.

4.36 Option 4 is not considered to be the most appropriate strategy for growth and would result in a plan which is unjustified and inconsistent with national policy. **It is not favoured.**

**vii) Option 5 – Dispersal plus New Settlement**

4.37 Broadly similar to Option 4, albeit with the provision of a new settlement, the following distribution is proposed above baseline:

- Fringe Sectors – 350 dwellings inc. 100 in north and north-west, 100 in west and 150 in south-west;
- Main Towns – 650 dwellings mainly to Wymondham, Diss and possibly Harleston;
- Key Service Centres – 400 dwellings majority to those in South Norfolk;
- Other – 1,400 dwellings to villages dependent on a range of factors including availability of sites, location, access to services and deliverability; and
- New Settlement – 500 dwellings, within a transport corridor.

4.38 The findings of the Interim Sustainability Appraisal are as per Option 4, with Option 5 likely to result in significant dispersal of development to locations less well related to services, facilities and employment opportunities.

4.39 Furthermore, Option 5 includes the provision of a new settlement, located within a transport corridor. While this may result in a benefit above that proposed in Option 4 (if the new settlement is located within the 'Core Area' and/or Cambridge Norwich Corridor), as detailed below, it is not considered appropriate for this to be relied upon at this time.

4.40 Option 5 is not considered to be the most appropriate strategy for growth, resulting in a strategy which would be unjustified and inconsistent with national policy. **Option 5 is not favoured.**

**viii) Option 6 – Dispersal plus Urban Growth**

4.41 Option 6 provides general dispersal across villages, while allowing significant growth in the fringe parishes, particularly the north east and west fringe. The proposed distribution, above baseline, is as below:

- Fringe Sectors – 1,900 dwellings inc. 1,000 in north-east, 200 in north and north-west, 500 in west and 200 in south-west;
- Main Towns – 150 dwellings distributed to Wymondham, Diss and possibly Harleston;
- Key Service Centres – 150 dwellings majority to those in South Norfolk; and
- Other – 1,100 dwellings to villages dependent on a range of factors including availability of sites, location, access to services and deliverability.

- 4.42 Option 6 scores similarly in the Interim Sustainability Appraisal to Options 4 and 5, with the exception of SA12 (reducing the need to travel and promote the use of sustainable transport modes) where development in the Fringe Sectors would be better related to the Urban Area of Norwich. Despite this, a significant element of growth (1,100 dwellings) would be located within village areas, which would not be well placed to meet this sustainability criteria.
- 4.43 As noted above for Option 4 (and 5), the proposed distribution within villages is largely unknown, to be 'dependent on a range of factors'. As such it is currently not possible to consider, in detail, the potential sustainability impacts (or benefits). This is a significant risk which cannot be properly assessed at this time.
- 4.44 In regards to the remaining distribution, there is significant growth allocated to the north-east sector which, as detailed in Option 1, has experienced historic under delivery thereby leading to doubt as to whether this level of growth could be achieved within the plan period.
- 4.45 There is also limited growth attributed to other key locations, outside the Fringe Area, including others within the 'Core Area' and along the Cambridge Norwich Corridor which jeopardies the potential economic benefits these vital areas could deliver.
- 4.46 On this basis, Option 6 results in an unsuitable distribution of growth with a significant dependence on unknown village locations (which are, by nature, less sustainable than overlooked settlements), inappropriate reliance on northeast sites and a lack of support for the 'Core Area' and Cambridge Norwich Corridor. Therefore, Option 6 would result in an ineffective and unjustified plan which risks being inconsistent with national policy. **This option is not favoured.**

**Q11) Are there any other strategic growth options that should be considered; and**

- 4.47 Yes. We consider that a hybrid version of Options 2 and 3 should come forward as a preferred option. This would serve to ensure that a 'Core Area' is supported but that there is a focus for delivering development along the A11 corridor, fulfilling the Spatial Objectives of supporting the Cambridge to Norwich Tech Corridor plus locating growth near to jobs and infrastructure.
- 4.48 Wymondham has the capacity to accommodate a significant scale of growth. This is due to its Main Town status and that it is a location that has delivered housing. It has good employment areas in its own right but it located close proximity to Norwich.
- 4.49 We believe the role of Wymondham should be elevated and our proposed dispersal in Table 4.2 below seeks to achieve that.

Table 4.2 – ‘Hybrid Options’ Proposed Dispersal

	Commitment	Baseline	Option	Total	Growth %	Distribution of growth option
Norwich	6,999	1,500	-	8,499	20	The current figure of 1,500 homes in the baseline aims to maximise growth on brownfield sites whilst retaining sites for employment, town centre and open space uses. It will be kept under review as the plan progressed.
Fringe Sectors	21,381	200	1,700	23,281	54	Around: 500 homes in the north east; 200 in north and north west; 500 in the west; 500 in the south west. Due to existing commitment and environmental constraints associated with the Broads, there would be no growth in this option above the baseline in A47 (E) corridor.
Main Town	5,468	550	1,600	7,618	18	The remaining 1,600 homes would be allocated to Wymondham in the A11 Corridor.
KSCs	674	450	-	1,124	3	



	Commitment	Baseline	Option	Total	Growth %	Distribution of growth option
Service and Other Villages or Village Groups	1,143	1,200	-	2,343	5	
<b>Totals</b>	<b>35,665</b>	<b>3,900</b>	<b>3,300</b>	<b>42,865</b>	<b>-</b>	
		<b>7,200</b>				

- 4.50 Furthermore, through the allocation of sufficient growth to Wymondham the GNLP has the potential to resolve the ongoing Secondary Education capacity constraint currently affecting the south-west area (as detailed further in subsequent sections). While identified as an existing constraint by the Interim Sustainability Appraisal under objective SA10, the consultation fails to regard how the alternatives would influence this (either negatively or positively). Currently, any growth attributed to the south-west of the District has the potential to exacerbate this issue, with a risk that a no growth option could be considered if the situation is not suitably dealt with. This would have a fundamental impact on the potential of the GNLP to deliver its full economic and social benefits, with any growth directed away from the Cambridge Norwich Tech Corridor. It is therefore considered that a 'no growth' option within this south-west area is not an appropriate alternative. The education 'issue' therefore must be dealt with through this plan-making process.
- 4.51 Therefore, the preferred alternative is one which includes a recognition of the importance of the 'Core Area', directs significant growth to the Cambridge Norwich Corridor and allocates sufficient growth in Wymondham to resolve the strategically important issue of Secondary education capacity. This is a reasonable alternative which would help achieve the objectives of the GNLP. To ensure the plan is justified, this reasonable alternative therefore needs to be assessed as part of the Sustainability Appraisal to be undertaken.
- 4.52 A report, commissioned by Norwich City Council, entitled Norwich Economic Analysis (GVA, June 2017) examines the functional economic geography of Norwich and its growth potential. As acknowledged in para 2.8 of this report, the authority area of Norwich City Council is not an accurate geography in seeking to understand or capture the true economic value or potential created by Norwich. Instead the economic influence of Norwich extends beyond this urban area. Para 2.19 and Figure 6 (taken directly from the SHMA 2016) identify strong labour

connections with 11no. proximate settlements (including Wymondham), with Norwich functioning as part of a wide and interconnected network. As concluded in para 2.26 the 'Core Area' shows the settlements with the strongest connections to the Norwich Urban Area, suggesting a large proportion of housing should be delivered in these locations.

- 4.53 This is further reviewed in evidence prepared by Barton Willmore Development Economics (Greater Norwich Technical Report – Economic Geography, March 2018, Appendix 2) which provides an analysis of the functional economic relationships within the Greater Norwich Area, looking at the relationships between places where people live and places where people work.
- 4.54 A review of Travel to Work data highlights the strongest flows, outside the Urban Area and Fringe, are along the main arterial routes into the city, particularly along the A11 from the southeast. Relatively few people travel to Norwich from settlements near to the southern edge of the HMA, including Diss. The evidence highlights that the existing NPA, with 71% of Norwich workers residing within this area, broadly represents a Travel to Work Area.
- 4.55 Further to this, 81% of jobs in the Greater Norwich Area are located within the NPA, the majority of which are located within Norwich, its Fringe and Wymondham. The only settlement outside the NPA having in excess of 2,500 existing jobs being Diss.
- 4.56 Over the plan period, employment forecasts (provided by Oxford Economics) identify strong employment growth (circa. 17,000 across the Greater Norwich area), of which 83% of the forecast is predicted be located within the NPA (mainly Norwich and South Norfolk). These forecast, from Oxford Economics, are derived from nationally-consistent forecasts and therefore do not take full account of potential policy interventions designed to promote above-trend growth. In this instance, the GNLP acknowledges external influences which have the potential to deliver additional growth, including the Cambridge Norwich Tech Corridor and the City Deal.
- 4.57 This evidence highlights the importance of ensuring an appropriate spatial strategy is proposed which delivers the right number of homes in sustainable locations close to where jobs are expected to be created, including taking full account of initiatives such as the Tech Corridor and City Deal, which have the potential to deliver above-trend employment growth, boosting the local economy. The preferred option, a hybrid version of Option 2 and 3, will help achieve this.

**Q26) Do you support a Norwich centred policy area and, if so, why and on what boundaries?**

- 4.58 Yes. We support a Policy area focused towards Norwich City. This would ensure Growth is focused in the right areas to deliver the spatial strategy plan and allow for appropriate monitoring.
- 4.59 Historically, the Norwich Policy Area (NPA) has been the area used to ensure that growth needs arising from the Norwich urban area are delivered as acknowledged through para 4.159 – 4.170 of the GOCD.
- 4.60 The NPA is a long-standing policy designation, previously identified within the Norfolk Structure Plan and carried forward within the East of England Regional Spatial Strategy which encouraged Norwich-related growth to be located in close proximity to the City. As detailed in para 13.68 of the Regional Spatial Strategy (2008):

**The Norwich policy area covers the urban area, the first ring of villages and the market town of Wymondham. In terms of numbers it is, with Cambridge, one of the two locations with the highest level of growth in the region. It will be the main focus for the north-east of the region, and has the potential to develop further as a major focus for long term economic development and growth.**

- 4.61 The importance of the NPA was acknowledged in the adopted Joint Core Strategy (2011) which sought to direct strategic growth to this area, including significant levels of housing, improved employment opportunities and key infrastructure development. This included enhancements to public transport, including the Bus Rapid Transport, and highways improvements, including the Northern Distributor Road.
- 4.62 The NPA has been successful in directing growth to this area and ensuring the identified social and environmental benefits have been (or are being) successfully delivered. This has, in part, been due to the requirement for sufficient sites to be identified to meet the NPA housing requirement, and as such a 5-year housing land supply within the NPA to be maintained.
- 4.63 The SHMA, which forms part of the evidence base for this consultation, identifies that the NPA itself does not form a functional housing market area (HMA). While the GOCD acknowledges the role the NPA has played in the past it argues it is no longer appropriate for a NPA specific housing land supply to be required/monitored.

- 4.64 We disagree with this conclusion and consider the GOCD is confusing the role of a SHMA for the purposes of determining Housing Needs and a specific policy based area to ensure the right growth is delivered in the right locations.
- 4.65 While the NPA itself does not form a functional HMA, a slightly larger area, defined as the 'Core Area' (including Acle, Aylsham and Loddon) has been concluded to be a functional HMA. However, given no other settlements outside this area are sufficiently self-contained to establish a separate HMA (or areas), the SHMA concludes the most appropriate HMA, for the plan, is the Central Norfolk HMA.
- 4.66 Regardless of the HMA, the SHMA identifies the Core Area to be the area with the strongest functional connection to the Norwich Urban Area. On this basis, the Council's own evidence clearly supports the GNLP directing growth to this Core Area
- 4.67 As detailed in the Greater Norwich Technical Report (Appendix 2), and as summarised above, the NPA continues to represent a relevant area to direct growth, being an appropriate Travel to Work Area where future job growth will be focused. Given its continued high degree of self-containment it is questionable whether it is necessary for a new 'Core Area' to be defined.
- 4.68 **We strongly urge the GNLP to continue the approach set by the NPA in directing growth to a defined area (whether NPA or similar distinction) with the strongest functional relationship to Norwich. The boundary of this area should also reflect the preferred spatial strategy i.e. towards an A11 focus.**
- 4.69 Without a policy area focusing growth in key locations, there are **risks that the strategy will fail.**
- 4.70 As acknowledged as one of the key policy headings for the GNLP, in order to meet the plan's Visions and Objectives, the GNLP will promote the Cambridge Norwich Tech Corridor. The Cambridge Norwich Tech Corridor (initially proposed as the A11 Growth Corridor) began as a partnership between South Norfolk, Breckland and Forest Heath Councils. The Councils funded a comprehensive study of the corridor (Delivering the Economic Growth Potential of the A11 Corridor, Bruton Knowles, June 2016) which highlighted the potential for it to deliver significant economic growth by 2031, including 6,100 net additional jobs, many of which will be within high value employment sectors.

- 4.71 Since this time the partnership team has expanded to also include Cambridgeshire County Council, East Cambridgeshire District Council, Greater Cambridge Greater Peterborough LEP, New Anglia LEP, Norfolk County Council, Norwich City Council, St Edmundsbury Borough Council and Suffolk County Council.
- 4.72 The full economic and social benefits of the Corridor can only be realised if the GNLP provides significant support for this key growth location, including backing development opportunities within this Corridor and, importantly, ensuring sufficient housing is provided, in close proximity to existing and proposed employment opportunities.
- 4.73 Whilst it may be argued that the identification of specific sites will alleviate the need to for a policy area to direct growth, it is still deemed important that the area is defined, in the event that alternative sites are required to be relied upon to deliver houses or jobs in the event the allocated sites, for whatever reason, fail to deliver. This ensures the plan has the ability to respond rapidly to the market with the focus remaining on the growth locations.
- 4.74 A positively prepared, effective and justified Plan will need to ensure it has fully considered the potential benefits arising from the Cambridge Norwich Tech Corridor and, where necessary, supports its delivery. **The most appropriate strategic growth option will include the necessary measures to enable this.**

**Q12) Do you support the long term development of a new settlement or settlements?**

- 4.75 As part of the consultation, a New Settlements Topic Paper has been produced, supporting the GOCD which considers whether a new settlement could assist in meeting the plan's growth objectives. This is considered in response of 2no. sites, at Honingham Thorpe (site reference GNLP 0415 A to G) and West of Hethel (site reference GNLP1055) submitted through the 'call for sites' which could potentially support a new settlement including housing and other uses.
- 4.76 In order for a new settlement to be sustainable, and achieve the principles of being a Garden Village or Garden Town, it must be of sufficient scale to support a range of facilities and services, thereby being relatively 'self-contained'. The Government defines a Garden Village being a settlement between 1,500 and 10,000 homes and a Garden Town in excess of this.
- 4.77 The Topic Paper highlights that a minimum size for a new settlement will need to be 2,000 homes, being able to support a primary school and a small range of local shops and other services. Any site below this, not an extension to an existing urban area or large village, would consequently be an isolated group of houses in the open countryside, and therefore not sustainable.

- 4.78 The delivery of new settlements is risky and unpredictable, with the opportunities and constraints afforded by the submitted sites currently unknown until in-depth and detailed site investigation work has been undertaken. Furthermore, in order to deliver these settlements significant new infrastructure will be required, the costs of which need to be secured by way of legal agreement with landowners prior to allocation, to capitalise the uplift in land values.
- 4.79 The sites put forward, at Honingham Thorpe and Hethel, are not currently serviced by the infrastructure essential to support the necessary growth. The significant infrastructure, including highways and social infrastructure, would need to be delivered up-front. While this may be achievable in the long-term, especially if a necessary legal agreement is entered into, it is unlikely to be deliverable within this plan period.
- 4.80 While the delivery of a new settlement could be a suitable long-term aspiration of the plan, it is not considered appropriate for the emerging GNLP to rely upon it delivering housing in the current plan period.
- 4.81 Furthermore, it is not considered necessary for the GNLP to rely upon the delivery of a new settlement, as sufficient suitable and deliverable land, available adjoining existing sustainable settlements, has been identified.

## 5.0 SUITABILITY OF WYMONDHAM

- 5.1 Wymondham is the largest settlement in South Norfolk and is classified as a Main Town within the adopted JCS Settlement Hierarchy. Furthermore, Wymondham is one of the largest towns on the Cambridge Norwich Tech Corridor, with the A11 being located to the south and east of the settlement. The town is also located within the Core Area defined by the SHMA (and currently sits within the NPA).
- 5.2 The location of the town has good, well establish accessibility and connectivity to both Norwich and the employment opportunities on the A11 corridor, and existing high-quality services.
- 5.3 Wymondham (as a parish) currently has outstanding commitments of 2,674 dwellings, of which all the main committed sites have commenced development and are due to be completed by 2026. Furthermore, there are no known barriers to the completion of this development.
- 5.4 There continues to be a strong housing market in Wymondham with an ongoing demand for new homes.
- 5.5 As acknowledged in previous plan-making exercises, there are a number of continued constraints to growth of the town which remain a consideration for the GNLP. This includes the requirement to protect the historic core (including the Grade I listed Wymondham Abbey), consideration of landscape setting of the town and Secondary School capacity issues.
- 5.6 The adopted Wymondham Area Action Plan (WAAP, 2015) details 3 particular constraints, namely:

### *The Strategic Gap*

**A strategic gap has been defined to maintain the separation of Wymondham and Hethersett and safeguard the identity of each settlement. The importance of this gap is confirmed in Policy 10 of the JCS. Policy 4.7 of the Development Management Policies Document seeks to maintain the openness of the strategic gap between Wymondham and Hethersett and inappropriate development which has an unacceptable impact on the openness and separation afforded by the gap will not be permitted. Future growth to the north and north-east of Wymondham is therefore constrained.**

*Wymondham Abbey and the Historic Landscape Setting of the Town*

Wymondham Abbey is a Grade I listed building and its ruins and surrounding meadows are designated as a Scheduled Monument. Wymondham Abbey is arguably the single most historic and important building in the whole of South Norfolk and safeguarding its setting is a critical consideration for the AAP. The importance of protecting the historic setting of the town and abbey is confirmed in Policy 10 of the JCS. Views of the Abbey tower can be seen from a considerable distance, particularly from the west and north-west, but there are glimpsed views from many other parts of the town. Future growth to the west of Wymondham is therefore constrained and development elsewhere (particularly in the south-western part of the town) would need careful consideration.

*The capacity of Wymondham High School (Academy)*

Wymondham High School (Academy) and Norfolk County Council (as Education Authority) are in agreement that the High School can accommodate additional pupil numbers from up to 2,200 new homes in the period to 2026, but no more. The school's site is constrained, and whilst investment plans are in place to accommodate the additional numbers, the school strongly wishes to retain both its playing fields and sixth form on one site. As an Academy, the scope for Norfolk County Council to 'dictate' admission policy and future expansion proposals is much more limited than for a grant maintained school.

- 5.7 The SPCD acknowledges these constraints, as well as the identifying a potential highways capacity issue regarding a bottleneck under the railway line which could further constrain development to the south of the town.
- 5.8 Regardless of these constraints, as the largest settlement in South Norfolk, a key location within the Core Area and Cambridge Norwich Corridor, and a location with high demand for new homes, Wymondham is a location where continued growth should be encouraged and allowed to occur.
- 5.9 The Site, at North East Wymondham, can deliver significant growth in a sustainable and suitable location which has regard to (where necessary) the limited number of identified constraints. This is detailed further in Section 6. It is not located in the Strategic Gap (save an expect an area of proposed Country Park) nor does it affect the setting of the Grade I Wymondham Abbey.
- i) Secondary Education Capacity**
- 5.10 As acknowledged within the WAAP, previous plan making exercises and relevant Inspector's Reports, there is a clear need to resolve secondary education capacity in Wymondham. The WAAP Inspector, in his report, acknowledged:



**It will be necessary to review the planning and provision of school places in the light of any new housing requirement that extends beyond the current plan period and as planned housing development comes forward, including in Wymondham, Hethersett and Cringleford. This would allow appropriate long term decisions to be made about the location of new housing having regard to the planning of school places (and vice versa). This is a further matter which justifies an early review of the plan, particularly given the potentially lengthy lead in times necessary to plan for additional school places, should they be needed.**

- 5.11 Whilst the lack of education capacity is, in itself not a valid reason for refusal (as confirmed at the Appeal relating to the Wymondham Rugby Club, Land West of Elm Farm Business Park and Land North of Carpenters Barn, Wymondham (ref. APP/L2630/W/3007004, 08 September 2016)), the continued lack of positively addressing the delivery of a new secondary school in Wymondham or indeed the south west sector is creating both a short term problem and exacerbating pressure on the existing school infrastructure.
- 5.12 As a result, the lack of school places is at odds with the requirement of para. 72 of the NPPF and para. 20 of the emerging NPPF which identifies education as a strategic policy required for each authority to plan for.
- 5.13 **It is therefore vital that the emerging plan acknowledges the severity of the education capacity issue, in Wymondham and the south-west sector and identifies this as a strategic priority for resolution.**
- 5.14 Furthermore, in order to achieve resolution, the plan will need to identify a suitable solution, through delivery of a new Secondary School.
- 5.15 **Should the proposed plan fail to adequately deal with this matter it risks being found unsound on the basis it will not be positively prepared, be unjustified and inconsistent with national policy,** including the proposed amendments to the NPPF which highlight education as a key provision of the strategic policies.

## 6.0 SUITABILITY OF LAND AT NORTHEAST WYMONDHAM

- 6.1 Land at North East Wymondham (the Site) has been promoted through previous plans, including the Joint Core Strategy and WAAP. The Site represents a sustainable location for development which will deliver a significant level of housing and, crucially, can deliver a solution to Wymondham's secondary education capacity constraint.
- 6.2 As identified throughout these representations, the GNLPP should seek to deliver growth within the Core Area and Cambridge Norwich Growth Corridor. The Site is located within both of these key areas. Furthermore, it is located within the existing Norwich Policy Area (NPA).
- 6.3 An indicative Masterplan for the site is included in **Appendix 1** demonstrating the site's context within its surroundings, including reflecting the planning permissions granted for residential and other development adjoining the site.
- 6.4 The site currently comprises circa 160 hectares of mainly agricultural land, extending from the A11 in the south, across Norwich Common and to Tuttle Lane in the north. In the main, the site is located outside the designated Hethersett – Wymondham Strategic Gap, with the exception of an area east of the site (identified for open space).
- 6.5 As demonstrated in the Masterplan, as well as delivering up to 1,500 residential dwellings (including affordable housing), the site could deliver mixed use/employment land, a local centre, land for a primary school / High School / All through school, allotments, significant areas of formal and informal open space included sports pitches and courts.
- 6.6 In addition, the site would allow the delivery of 'Kett's Oak Country Park' to the east of the town, seeking to enhance the setting of the historic Kett's Oak and improving public access and recreational opportunities to the countryside, a key policy objective (WYM 9) of the adopted WAAP.
- 6.7 The proposed site includes capacity for the provision of a new Secondary School site, located between Norwich Common and the A11. The location of the school would be ideally located, servicing the consented development (and proposed allocation) to the northeast of Wymondham, while remaining accessible to the remainder of the town and nearby villages, including Hethersett.

- 6.8 The delivery of a secondary school in Wymondham (or in the south-west sector of the NPA) is a strategically important matter. Therefore, the provision of a school site within the promotion land is considered to be a substantial benefit that the scheme can deliver, thus providing a solution to the persistent secondary education constraint which has continued through previous plan-making exercises.
- 6.9 Furthermore, as noted in the Site Proposals consultation report, no other HELAA sites in Wymondham or within the wider area have identified the potential to deliver a solution to the secondary school capacity issues that will arise through development to 2036. As such, the proposed allocation presents a unique and significant opportunity to achieve a strategic priority of the plan.
- 6.10 In regards to the other constraints identified in the Site Proposals consultation document and as detailed in Section 5, the site is located to maintain the separation of Wymondham and Hethersett with no residential development located within the strategic gap, the site is located away from Wymondham Abbey and the historic market town core, thereby ensuring the setting of these key heritage assets is preserved, and the site is well located to the existing highway network with no requirement for any off-site highway improvements relating to access under the railway line affecting south Wymondham.
- 6.11 The Site Proposals consultation document concludes that the least constrained sites within Wymondham are located to the north of the town, with the site (HELAA site GNLP0525) potentially suitable for significant growth.
- 6.12 This area, to the north of Wymondham, has been subject to a number of applications/appeals over the past decade, all of which have been granted/allowed and have or are shortly to commence development. These committed developments are shown on the indicative Masterplan.
- 6.13 Within this north east sector of Wymondham, on land promoted by the Promoters, delivery has historically been very strong. Over the past 12 years circa. 800 dwellings have been completed at varying rates. Most recently, at the Carpenters Barn site, 106 dwellings have been completed in the 12 month period (January 2017 - December 2017) by a single developer.
- 6.14 In addition, the site is located on the B1172 Norwich Common. This is on the proposed route of the Bus Rapid Transit route from Wymondham Railway Station to Norwich. This represents significant advantages of located development at the site and access to high quality public access. The delivery of further growth can assist in contributing towards the delivery of the BRT in this location.

6.15 The site, at 'Land at North East Wymondham' is deliverable, providing an appropriate location for growth which will help the GNLP achieve its Visions and Objectives. Crucially, the site provides a solution to the persistent Secondary education constraint in Wymomdham and across the south-west. The site is considered to be sustainable and located in proximity to existing services and facilities, as well as near to proposed employment opportunities along the Cambridge Norwich Tech Corridor. As such, it is considered a suitable site to be allocated in the GNLP.

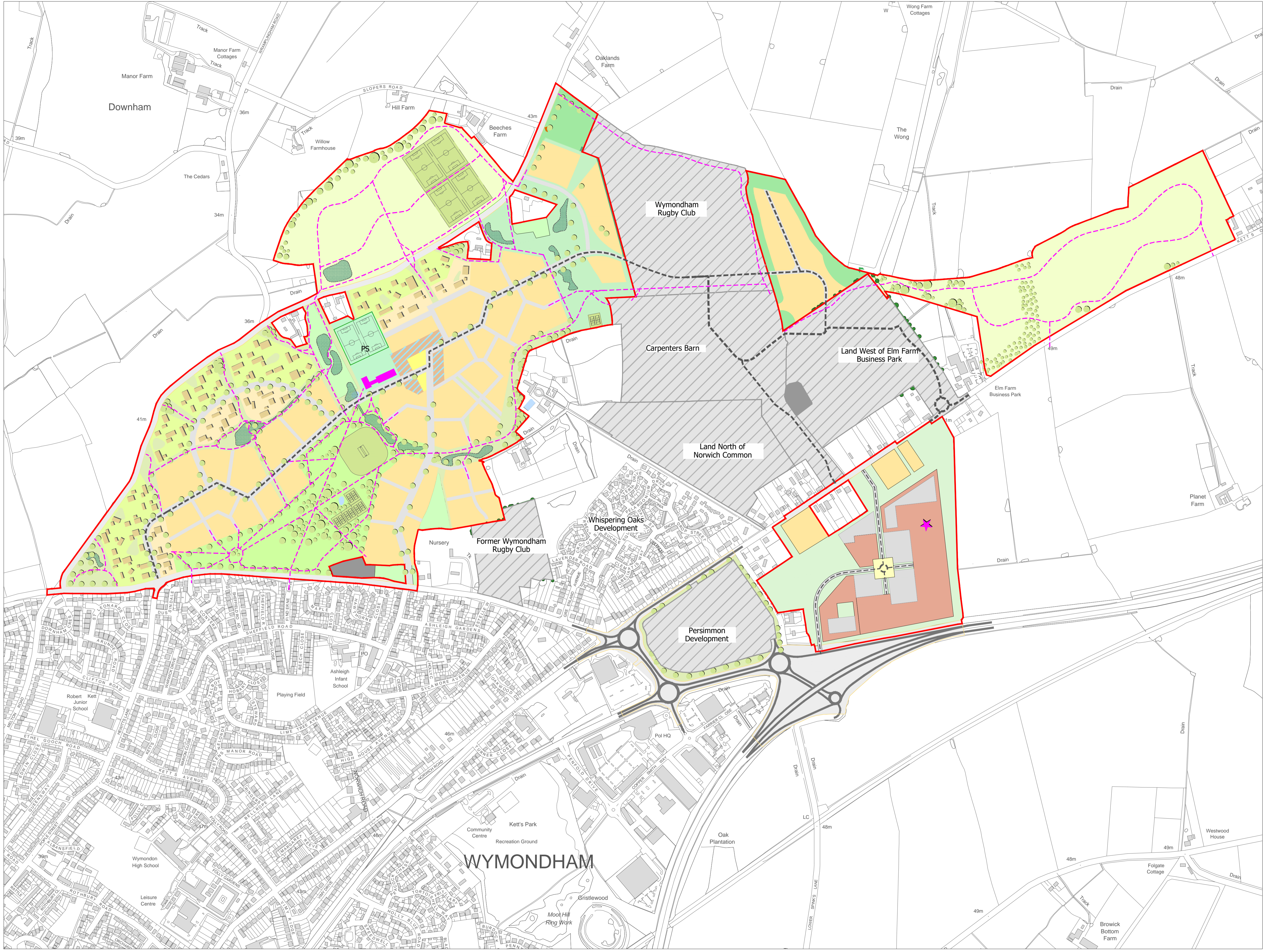
## 7.0 CONCLUSION

- 7.1 As acknowledged in the foreword to the Growth Options Consultation Document, well planned growth brings forward great benefits, providing high quality homes, jobs and infrastructure, while at the same time protecting and improving the environment. The current consultation sets out a number of potential 'Growth Options' which seek to successfully achieve the Visions and Objectives of the emerging plan.
- 7.2 As detailed in Para 182 of the NPPF, Local Plans will only be considered 'sound' where they are:
- Positively prepared – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
  - Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
  - Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
  - Consistent with national policy.
- 7.3 In order to meet the housing requirement, it will be necessary to allocate land for 7,200 dwellings, incorporating the proposed Standardised Methodology as the OAN starting point plus appropriate buffer.
- 7.4 The Strategic Housing Market Assessment demonstrates that a 'Core Area' exists, representing the strongest functional connection to the Norwich Urban Area. Evidence has been prepared and is included within this submission (Appendix 2) which highlights the continued importance of the NPA as a relevant area to direct growth. This area, or a similar distinction (i.e. Core Area) should remain the focus of growth and a Policy be prepared to that effect, similar to the existing NPA approach. The current Growth Options fail to consider the influence of the NPA/Core Area.
- 7.5 As well as housing delivery, a focus of the plan will be on the delivery of economic growth, in order to achieve the aspirations of the City Deal. Key to this, as acknowledged as one of the proposed Visions and Objective policy headings, will be the promotion of the Cambridge Norwich Tech Corridor. Focusing growth within the Corridor is vital to meeting the plan's Vision and Objectives and promote economic growth.

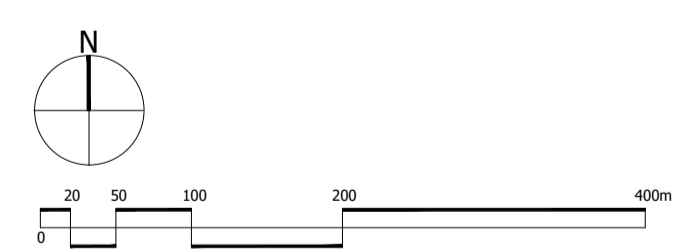
- 7.6 On this basis, we consider a hybrid version of Growth Options 2 and 3 should come forward as a preferred options, serving to ensuring the Core Area is supported with a focus for delivering development along the Cambridge Norwich Tech Corridor (A11). A proposed dispersal is included in Section 4.
- 7.7 Furthermore, the allocation of sufficient growth to Wymondham has the potential to resolve the ongoing Secondary Education capacity constraint currently affecting the south-west area, which is a strategic priority which must be dealt with through this plan-making exercise.
- 7.8 The site, at Land at North East Wymondham, represents a deliverable and suitable site for development which can assist the Plan in achieving its Visions and Objectives, within the Core Area and on the Cambridge Norwich Tech Corridor. Importantly, the site provides a solution to the ongoing education capacity issue. No other site has been identified to be able to provide this. As such, it should be allocated in the emerging Greater Norwich Local Plan.

**APPENDIX 1**

**Illustrative Site Masterplan**



- Legend**
- Site Boundary (159.70ha / 394.63ac)
  - Development
  - Mixed Use/ Employment
  - Low Density Development Edge\*
  - Local Centre
  - Primary School
  - Square
  - Road
  - Strategic / Leisure Pedestrian and / or Cycleways Routes
  - Landscape Buffer / Open Space
  - Natural Green Space
  - Meadow Land
  - Allotments / Orchard
  - Town Park
  - Sports Pitches / Courts
  - Existing Uses to be Retained
  - Approved Development Schemes & Schemes Under Construction
  - Existing Landscape to be Retained
  - Proposed Tree Planting
  - Attenuation Ponds
  - Existing Water Bodies
  - ★ Potential Secondary Education Facility
- \* Graphic not Denoting Layout or Density of Development.



Project  
**NORTH EAST WYMONDHAM,  
 NORFOLK**  
 Drawing Title  
**ILLUSTRATIVE MASTER PLAN**

Date 10.12.13	Scale 1:5000@A1	Drawn by NO	Check by A.P.
Project No 21389	Drawing No 04	Revision C	



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## **APPENDIX 2**

**Annual Monitoring Report 2016 – 17 – Appendix A (March 2018)**

## Appendix A – Greater Norwich area Housing Land Supply Assessment 1st April 2017

### Summary

This note sets out the housing land supply position for the Greater Norwich area as at 1 April 2017. The National Planning Policy Framework (NPPF) requires the three authorities to demonstrate a five year supply of housing land. The National Planning Practice Guidance (NPPG) advises that the assessment of housing land supply should be undertaken against the requirement figures within the adopted development plan where these are up to date and no significant new evidence has come to light.

The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was adopted in March 2011, with amendments January 2014. It establishes a housing requirement for Greater Norwich to 2026. Significant new evidence on housing need, in the form of the Central Norfolk SHMA, was published in January 2016 and updated in July 2017. The SHMA is based on the most up-to-date evidence available and is a robust and accurate assessment of housing need. The SHMA assessment of housing need was included in the Norfolk Strategic Planning Framework (NSF). The NSF was widely consulted on in summer 2017 and was endorsed by the participating councils in February 2018.

When five year supply (plus the required 20% buffer in the NPA and 5% buffer in the RPAs) is considered against the SHMA assessment of Objectively Assessed Need (OAN) for housing, there has been a housing delivery surplus in the NPA and the residual rural area of Broadland and a relatively small housing shortfall in the residual rural area of South Norfolk. Against the SHMA OAN the authorities can demonstrate:

- 161.6% for the NPA (8.08 years / 5,368 home surplus);
- 298.8% for the Broadland rural area (14.94 years / 867 home surplus); and,
- a minimum of 87.6% for the South Norfolk rural area (4.38 years / 232 home shortfall)

When the five year land supply is calculated using the SHMA OAN, including uplift associated with the Greater Norwich City Deal, the authorities can demonstrate:

- a minimum of 136.4% for the NPA (6.82 years / 3,758 home surplus);
- 228% for the Broadland rural area (11.4 years / 728 home surplus); and,
- a minimum of 79% for the South Norfolk rural area (3.95 years / 431 home shortfall)

When the five year land supply is calculated using the JCS as its base, the authorities can demonstrate:

- 92.2% supply for the Norwich Policy Area (NPA) (4.61 years / 1,187 home shortfall);
- 963% supply for the Broadland rural area (48.15 years / 1,163 home surplus); and
- 1250% supply for the South Norfolk rural area (62.5 years / 1,496 home surplus)

There has been a significant and substantial increase in the size of housing commitment in Greater Norwich since the base date of the JCS. The JCS calculated total housing commitment to be 14,090 units at 1 April 2008; this compares to 35,687 units at 1 April 2017. This significant increase has occurred against a backdrop of 13,457 housing completions since 1 April 2008.

Between 1 April 2016 and 31 March 2017 2,251 dwellings were completed across Greater Norwich, of which 1,810 were in the NPA. The total deliverable housing land supply within the current 5 year period (1 April 2017 to 31 March 2022) is estimated to be 17,016 homes, of which 14,091 are within the NPA. In total there are currently sites with planning permission or in adopted local plans sufficient to deliver 28,480 homes by 2026, of which 24,784 are within the NPA. In combination with housing completions since 2008, the delivery of these sites would result in the JCS housing requirement being exceeded by 5,117 dwellings across Greater Norwich and 1,869 in the NPA.

Notwithstanding the existence or otherwise of a housing land supply, the Greater Norwich Authorities recognise that further housing land, above and beyond the existing commitments, needs to be identified to 2036. The authorities have committed to the production of the Greater Norwich Local Plan (GNLP) to plan for these additional needs. Ahead of the adoption of the GNLP the authorities will continue to take a positive approach to development proposals that complement, rather than detract from, the existing and emerging development strategies, reflecting the presumption in favour of sustainable development.

## Introduction

1. The National Planning Policy Framework (NPPF) seeks to boost significantly the supply of housing. To achieve this local authorities are required: to meet the *'full, objectively assessed needs for market and affordable housing in the housing market area'*; and, demonstrate *'a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% ... to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20%'*.
2. The National Planning Practice Guidance<sup>13</sup> (NPPG) states that requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the 5 year supply and that considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light.
3. The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was adopted in March 2011, with amendments January 2014. It establishes a housing requirement for Greater Norwich to 2026. This housing requirement was to be monitored separately against a core Norwich Policy Area (NPA) and the two residual rural areas of Broadland and South Norfolk. Significant new evidence on housing need, in the form of the Central Norfolk SHMA, was published in January 2016 and updated in July 2017.
4. Since its adoption in 2011, housing delivery in the NPA has not kept pace with the JCS housing requirement nor has it been possible to demonstrate a 5 year housing land supply. The absence of land supply persists despite the delivery of very significant increases in housing land supply commitments (the sum of planning permission and allocations of land). Housing delivery has however significantly exceeded the JCS housing requirements in the residual rural areas of Broadland and South Norfolk and a plentiful land supply continues to be maintained.
5. If measured against the more recent SHMA assessment of OAN there has been a housing delivery surplus in the NPA and the residual rural area of Broadland and there is a plentiful housing land supply. Within the residual rural area of South Norfolk there has been a relatively small housing shortfall and it is not possible to demonstrate a 5 year housing land supply.
6. The following sections of this report set out in more detail the issues that relate to housing land supply across Greater Norwich.
7. The tables 2 to 11 and the housing trajectories and forecasts included as appendices A to D set out the housing land supply position as at 1 April 2017 for the respective parts of the Greater Norwich area based both on the JCS housing requirements and the significant new evidence of housing need as contained in the 2017 Central Norfolk SHMA.
8. Notwithstanding the existence or otherwise of a housing land supply or the fact that housing commitments are at an all-time high, the Greater Norwich Authorities recognise that there is a need for the identification of further housing land above and beyond the existing housing commitments to 2036. The authorities have committed to the joint production of the Greater Norwich Local Plan (GNLP) to plan for these additional needs. Nevertheless, ahead of the adoption of the GNLP the authorities will continue to take a

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<sup>13</sup> Paragraph 30, ID: 3-030-20140306

positive approach, reflecting the presumption in favour of sustainable development, to development proposals that complement, rather than detract from, the existing development strategy.

9. Additionally, the Greater Norwich Authorities will continue to working closely with partners in the development sectors and the LEP and through initiatives such as the Local Infrastructure Fund and Housing Infrastructure Fund to stimulate delivery on committed development sites.

### **The starting point for calculating the 5 year supply - Housing requirement**

10. As set out above, the NPPG advises that the assessment of housing land supply should be undertaken against the requirement figures within the adopted development plan where these are up to date and no significant new evidence has come to light.
11. The JCS, adopted March 2011 with amendments Jan 2014, establishes a housing requirement of 36,820 homes between 2008 and 2026, of which approximately 32,847 are planned for within the Norwich Policy Area (NPA). This results in an annual requirement of 2,046 for Greater Norwich, of which 1,825 need to be provided within the NPA.
12. The JCS housing requirement was established following an assessment of local need. The range of evidence sources that were used to derive the JCS housing requirement included the 2010 and interim 2011 DCLG population projections, the 2008 based household projections and the Spring 2012 update of the EEFM.
13. This evidence of local need, and the JCS housing requirement that was derived from it, was scrutinised as part of the independent examination of the JCS in 2013. On this matter the Inspector concluded that 'I am not convinced that the adopted JCS figure is so wrong that the amounts of housing proposed in this Plan need to be reduced or increased'<sup>14</sup>.
14. Significant new evidence on housing need, in the form of the Central Norfolk SHMA, was published in January 2016 and updated in July 2017.
15. The SHMA has been completed by leading consultants ORS in accordance with accepted best practice. The SHMA is the most up-to-date evidence of the Objectively Assessed Need (OAN) for housing in Greater Norwich. The SHMA uses a range of evidence that is significantly more recent than that which was used for the JCS, including the 2012 and 2014-based CLG household projections, 2014-based sub-national population projections and January 2017 update of the EEFM (EEFM 2016).
16. The Central Norfolk SHMA, July 2017 concludes that the Objectively Assessed Need (OAN) for housing in Greater Norwich is 39,486 homes. The OAN for the NPA is 30,593. This results in an annual requirement of 1,880 across Greater Norwich and 1,457 in the NPA. If the impact of the Greater Norwich City Deal is accounted for then the housing requirement in Greater Norwich increases to 44,714 or 2,129 per annum; in the NPA the housing requirement increases to 34,746 or 1,655 per annum.
17. The planning inspectorate has previously accepted the Central Norfolk SHMA as a reliable source of evidence on which the calculation of housing land supply should be based in North Norfolk.

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<sup>14</sup> See part JCS Inspector's report para 40.

## Housing Shortfall

18. Since 2008 there has been a housing delivery shortfall against the JCS housing requirement in the NPA. By contrast there has been a housing delivery surplus in the residual rural parts of Broadland and South Norfolk. Tables 1 and 2 below set out housing delivery against the JCS housing requirement.

Table 1 Housing Delivery against JCS NPA Requirement

Year	Actual/Projected Completions	Required Completions	Shortfall/Surplus
2008/09	1,193	1,825	-632
2009/10	923	1,825	-902
2010/11	910	1,825	-915
2011/12	915	1,825	-910
2012/13	882	1,825	-943
2013/14	992	1,825	-833
2014/15	1,143	1,825	-682
2015/16	1,164	1,825	-661
2016/17	1,810	1,825	-15
Total 2008-17	9,932	16,425	-6,493

Table 2 Housing Delivery against JCS RPA Requirement

Year	Broadland Rural Area			South Norfolk Rural Area		
	Actual/Projected Completions	Minimum Required Completions	Shortfall/Surplus	Actual/Projected Completions	Minimum Required Completions	Shortfall/Surplus
2008/09	198	89	+109	345	132	+214
2009/10	109	89	+20	205	132	+73
2010/11	69	89	-20	189	132	+58
2011/12	70	89	-19	197	132	+65
2012/13	106	89	+17	250	132	+119
2013/14	139	89	+49	110	132	-22
2014/15	188	89	+99	345	132	+214
2015/16	258	89	+169	306	132	+174
2016/17	234	89	+145	207	132	+75
Total 2008-15	1,371	801	+570	2,154	1,188	+966

19. As a result of the housing delivery shortfall in the NPA when measured against the JCS, table 1, the housing requirement for the purposes of calculating 5 year supply in the NPA has risen from 11,320 in 2013 to 11,839 in 2014, 13,593 in 2015, 14,835 in 2016 and 15,277 in 2017. This increase is the result of delivery remaining below the JCS annualised target, albeit only by a marginal 15 units in 2016/17.
20. By contrast, if 5 year supply is measured against the 2017 SHMA assessment of Objectively Assessed Need (OAN) for housing the NPA requirement has actually reduced from 1,457 in 2016 to 1,454 in 2017 due to a housing delivery surplus. If the SHMA OAN including the impact of the Greater Norwich City Deal is considered the requirement has increased from 1,655 in 2016 to 1,672 in 2017 due to a small housing shortfall.

## Housing Backlog

21. The Planning Advisory Service Good Plan Making Guide identifies that the SHMA should “re-set the clock” and provide a new baseline assessment of all housing need.
22. The Central Norfolk SHMA, July 2017, has fully considered the unmet needs of homeless and other households living in unacceptable accommodation (such as concealed families and sharing households) that existed in 2015. Furthermore, given that the SHMA also identifies all new housing need from the baseline date of 2015, all needs arising over the 21-year period 2015-36 have been identified and there will be no additional unmet need for housing to be counted for a new Plan with this base date.

## Sources of Supply

23. There is no prescribed approach to the sources of supply that can be included within the assessment of housing land supply. The Greater Norwich assessment includes sites with planning permission, sites where there is council resolution to grant planning permission and sites that have been allocated in adopted Local Plans. In all cases the authorities have only included sites which are capable of being delivered in whole or in part within the 5 year housing land supply period.
24. To inform the assessment, each local authority has undertaken a site-by-site assessment for sites of 5 or more units, in conjunction with site owners, developers or agents where possible. All known sites with planning permission for less than 5 units are assumed to be delivered within the five-year supply period as they are clearly suitable and available for delivery in accordance with NPPF paragraph 47, footnote 11. Details of the larger sites are included in Appendices C (Norwich Policy Area) and D (Rural Areas).
25. The JCS does not rely on the provision of windfall development to meet objectively assessed needs. It is however reasonable, in accordance with paragraph 48 of the NPPF, to include an allowance for future windfall development in the assessment of 5 year housing land supply. The windfall figures used are based on past trends in the respective parts of the NPA and Rural Area and exclude garden land and sites that have specifically been released to address previous shortfalls in the 5 year land supply.
26. The JCS housing figures are presented on the basis of a Norwich Policy Area (NPA), made up of the city and those parts of Broadland and South Norfolk which relate most closely to the city, plus separate residual Rural Areas figures for Broadland and South Norfolk. Figures in this paper are also presented for the constituent parts of the NPA.
27. It is notable that overall land supply in the NPA within the five year period has risen from 9,535 units in 2013, to 11,317 in 2014, 11,926 in 2015 and 13,931 in 2016. In 2017 the overall land supply within the five year period is 14,091. This increase in land supply has been achieved despite a level of completions in the NPA between 2016 and 2017 that is significantly higher than at any point since 2008.

### *Student Accommodation*

28. Students are included in the trend-based analysis that was used in establishing OAN in the Central Norfolk SHMA. Full time student numbers have grown by around 4,200 over the period 2005 to 2015. Consequently demographic projections assume that student numbers will continue to rise by 420 per annum for the 21 years from 2015 onwards.

29. Provided that the growth in student numbers is below 420 per annum, all student bedspaces can be counted as part of the housing land supply. The average size for a student household in the 2001 census was just over 3 students per household. Therefore, it would be reasonable to count each 3 student bedspaces as equivalent to 1 dwelling.
30. Research is ongoing into the number of bedspaces that have been delivered since 2015 and those that are likely to be delivered in the future. Therefore, at this point in time an estimate of the equivalent dwelling contribution of student bedspaces has not been included in the land supply. However, information on the provision of student bedspaces will be kept under review and if appropriate an update to this report will be issued.

### **Methodology for Calculating Housing Land Supply**

31. Both locally and nationally there is considerable debate about the appropriate methodology for calculating housing land supply. The two main areas of contention are around how 'persistent under delivery' is defined and how previous shortfalls in delivery should be recovered.

#### *Persistent Under Delivery*

32. Up to the 2013/14 monitoring year the Greater Norwich authorities used the 5% buffer in calculating land supply, as required by the NPPF. It is clear that prior to the economic downturn, which affected completions from 2008/09 onwards, the relevant housing requirement for the NPA had been met. However it is acknowledged that since the economic downturn and the adoption of the significantly larger JCS housing requirements in 2011, there has been a persistent under-delivery of housing. As a result a 20% buffer is applied to the NPA housing requirement in accordance with NPPF paragraph 47. The 5% buffer remains appropriate for the two Rural Areas where delivery has been consistently and substantially above the JCS requirements. The 5% or 20% buffer would be applied to both the baseline requirement plus any housing delivery shortfall.

#### *Liverpool vs Sedgefield approaches to recovering shortfall*

33. The other main area of contention is how any housing delivery shortfall is dealt with; whether it should be met across the remaining plan period (the residual or 'Liverpool' approach) or met in full within the five year period (the 'Sedgefield' approach).
34. The JCS was prepared and is monitored in accordance with the Liverpool approach. This is clearly illustrated in the trajectory contained in JCS Appendix 6 and is made explicit in the definition of indicators in Appendix 815. Current government guidance allows for both methodologies to be used and the issue was the subject of debate at the part 2013 JCS Examination. On this issue the Inspector agreed with the Greater Norwich authorities that 'the shortfall should be added to the housing delivery target over the plan period' 16.
35. Since the adoption of the JCS the NPPG has been published (March 2014) which favours the use of the Sedgefield methodology. However, it does not require it; instead stating that Local Authorities should 'aim to deal with any undersupply within the first 5 years of the plan period where possible' (emphasis added).

<sup>15</sup> Adopted JCS (January 2014), page 149, where the housing supply indicator is defined as 'CLG Core Output indicators H.2 a-d' which uses the residual approach.

<sup>16</sup> 2013 JCS Inspector's Report, para 66

36. Subsequent to the publication of the PPG various site specific documents for South Norfolk and Broadland<sup>17</sup> have been examined and found sound based on the Liverpool approach. The Inspector for the South Norfolk Site Specific Allocations noting that 'this is a reasonable, realistic and pragmatic approach, particularly given the reliance on larger strategic sites'<sup>18</sup>, similarly the Inspector for the Broadland documents concluded in both reports that 'I find that in this case the Liverpool approach is the most appropriate'<sup>19</sup>.
37. There is a strong logic to this approach. Having considered all reasonable alternatives in the plan preparation process it was determined that an approach involving a significant urban extension was the most appropriate option. This growth strategy is built around delivering significant new infrastructure, including the Northern Distributor Road, Long Stratton Bypass, new High School provision in the NE Growth Triangle, new Primary School provision at various locations, Bus Rapid Transit on key corridors, significant Green Infrastructure as well as a range of local enhancements.
38. It is very important that these major growth locations in Broadland and South Norfolk are not undermined by the release of a significant volume of smaller permissions that make little or no direct contribution to, and undermine the efficient and timely delivery of this key infrastructure. This issue is particularly significant in view of the extent of the backlog resulting from the prolonged downturn in the property market since 2008, which coincided with the base year of the JCS, which if the Sedgefield approach were applied could lead to a significant volume of permissions diverting investment away from the sites necessary to deliver the strategy.
39. Moreover, the approach to the application of the Liverpool approach in Greater Norwich is fully consistent with the national ambition to significantly boosting the supply of housing land. Meeting the revised JCS annual housing requirement already results in the need to identify a deliverable supply that is 60% above the baseline JCS housing requirement and doesn't leave a significant proportion of delivery to the last years of the Plan.
40. Therefore it remains appropriate to use the Liverpool methodology to monitor housing land supply where the JCS housing requirement is used as the starting point for the 5-year housing land supply calculation.
41. If the SHMA is used as the starting point for the 5-year housing land supply calculation in the NPA then there is only a housing shortfall, that needs to be recovered, in the SHMA OAN, including City Deals scenario. However, as there is an ample housing land supply across NPA under any SHMA scenario the question of the appropriate method to recover the shortfall is wholly academic.
42. There is also a housing shortfall identified in the South Norfolk RPA if the SHMA is used as the starting point for the 5-year housing land supply calculation. The appropriate method to recover will be considered separately, at this point in time a housing land supply cannot be demonstrated whichever method is used.

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<sup>17</sup> South Norfolk Site Specific Policies and Allocations Document; Wymondham AAP; Long Stratton AAP; Broadland Site Allocations DPD; and Growth Triangle AAP

<sup>18</sup> Report on the Examination into the South Norfolk Local Plan (Site Specific Allocations and Policies Document, Development management Policies Document and Wymondham Area Action Plan), 28 September 2015

<sup>19</sup> Report on the Examination into the Broadland Site Allocation DPD, 30 March 2016 & Report on the Examination into the Broadland District Growth Triangle Area Action Plan, 17 May 2016



### Housing Land Supply in the Norwich Policy Area (NPA)

43. It has now been accepted at a number of appeals that under the JCS it is the whole NPA that is the relevant area over which the calculation of housing land supply should be made. Separate figures for constituent parts of the NPA will nonetheless continue to be published for monitoring purposes. Trajectories showing the deliverable housing land supply to 2026 is included as Appendix A2 to A5. The 5 year housing land supply of the NPA against the JCS requirement, SHMA OAN and SHMA OAN including the impact of the City Deals are in the tables below.

Table 3 NPA Housing Land Supply - JCS Based

Liverpool	5 Year Housing Land Supply Assessment, April 2017			Sedgefield
32,847	JCS Plan Requirement 2008 - 2026			32,847
1,825	JCS Annual Requirement			1,825
16,425	Requirement 1 April 2008 to 31 March 2017			16,425
9,932	Completions 1 April 2008 to 31 March 2017			9,932
- 6,493	Housing Shortfall since 1 <sup>st</sup> April 2008			- 6,493
9,125	JCS 5 year requirement 2017/18 to 2021/22			9,125
3,607	6,493 / 9 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	6,493
12,732	9,125 + 3,607	Revised 5 Year Requirement	9,125 + 6,493	15,618
2,546	20%	Plus NPPF Buffer	20%	3,124
15,278	12,732 + 2,546	Total 5 year requirement 2017/18 to 2021/22	15,618 + 3,124	18,742
<b>3,056</b>	<b>15,278 / 5 years</b>	<b>Revised Annual Requirement</b>	<b>18,742 / 5 Years</b>	<b>3,748</b>
<b>14,091</b>	<b>Supply of Housing</b>			<b>14,091</b>
-1,187	15,278 – 14,091	Shortfall/Surplus of Supply	18,742 – 14,091	-4,651
<b>4.61</b>	<b>14,091 / 3,056</b>	<b>Supply in Years</b>	<b>14,091 / 3,748</b>	<b>3.76</b>

Table 4 NPA Housing Land Supply - SHMA OAN Based

Liverpool	5 Year Housing Land Supply Assessment, April 2017			Sedgefield
30,593	SHMA OAN 2015 - 2036			30,593
1,457	SHMA OAN Annual Requirement			1,457
2,914	Requirement 1 April 2015 to 31 March 2017			2,914
2,974	Completions 1 April 2015 to 31 March 2017			2,974
+60	Housing Shortfall/Surplus since 1 <sup>st</sup> April 2015			+60
7,285	SHMA OAN 5 year requirement 2017/18 to 2021/22			7,285
-16	60 / 19 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	-60
7,269	7,285 - 16	Revised 5 Year Requirement	7,285 - 60	7,225
1,454	20%	Plus NPPF Buffer	20%	1,445
8,723	7,269 + 1,454	Total 5 year requirement 2017/18 to 2021/22	7,225 + 1,445	8,670
<b>1,745</b>	<b>8,723 / 5 years</b>	<b>Revised Annual Requirement</b>	<b>8,670 / 5 Years</b>	<b>1,734</b>
<b>14,091</b>	<b>Supply of Housing</b>			<b>14,091</b>
+5,368	14,091 - 8,723	Shortfall/Surplus of Supply	14,091 - 8,670	+5,421

<b>8.08</b>	<b>14,091 / 1,745</b>	<b>Supply in Years</b>	<b>14,091 / 1,734</b>	<b>8.13</b>
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Table 5 NPA Housing Land Supply - SHMA OAN, inc. City Deal Uplift Based

<b>Liverpool</b>	<b>5 Year Housing Land Supply Assessment, April 2017</b>			<b>Sedgefield</b>
34,746	SHMA OAN 2015 - 2036			34,746
1,655	SHMA OAN Annual Requirement			1,655
3,310	Requirement 1 April 2015 to 31 March 2017			3,310
2,974	Completions 1 April 2015 to 31 March 2017			2,974
- 336	Housing Shortfall/Surplus since 1 <sup>st</sup> April 2015			- 336
8,275	SHMA 5 year requirement 2017/18 to 2021/22			8,275
88	336 / 19 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	336
8,363	8,275 + 88	Revised 5 Year Requirement	8,275 + 336	8,611
1,673	20%	Plus NPPF Buffer	20%	1,722
10,036	8,363 + 1,673	Total 5 year requirement 2017/18 to 2021/22	8,611 + 1,722	10,333
<b>2,007</b>	<b>10,036 / 5 years</b>	<b>Revised Annual Requirement</b>	<b>10,333 / 5 Years</b>	<b>2,066</b>
<b>14,091</b>	<b>Supply of Housing</b>			<b>14,091</b>
+4,055	14,091 - 10,036	Shortfall/Surplus of Supply	14,091 - 10,333	+3,758
<b>7.02</b>	<b>14,091 / 2,007</b>	<b>Supply in Years</b>	<b>14,091 / 2,066</b>	<b>6.82</b>

44. Table 3 above clearly shows that across the NPA the supply of deliverable land at 1st April 2017 continues to fall below what would be required under the JCS. By contrast, tables 4 and 5 clearly show that against the more recent SHMA assessment of housing need there is an ample supply of deliverable housing land in the NPA at 1st April 2017.
45. It should be noted that the supply of housing of 14,091 identified above represents only a part of the total housing commitment of 33,038 that existed in the NPA as of 1 April 2017. These sites within the larger housing commitment will continue to deliver beyond the 5 year supply period in order to meet overall requirement that are now being planned to 2026, and beyond.

#### **Broadland and South Norfolk Rural Areas**

46. Separate assessments of housing land supply are produced for the residual rural areas of Broadland and South Norfolk. Trajectories for these area are included as Appendices B1 and B2.
47. The 5 year housing land supply in the residual rural areas against the JCS requirement, SHMA OAN and SHMA OAN including the impact of the City Deals are shown in the tables below.

Table 6 BDC RPA Housing Land Supply - JCS Based

<b>Liverpool</b>	<b>5 Year Housing Land Supply Assessment, April 2017</b>			<b>Sedgefield</b>
1,605	JCS Plan Requirement 2008 - 2026			1,605
89	JCS Annual Requirement			89
803	Requirement 1 April 2008 to 31 March 2017			803
1,371	Completions 1 April 2008 to 31 March 2017			1,371
+ 568	Housing Surplus / Shortfall since 1 <sup>st</sup> April 2008			+ 568
445	JCS 5 year requirement 2017/18 to 2021/22			445
-316	568 / 9 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	568
129	445 - 316	Revised 5 Year Requirement	445 - 568	- 123
6	5%	Plus NPPF Buffer	5%	6
135	129 + 6	Total 5 year requirement 2017/18 to 2021/22	- 123 + 6	-117
<b>27</b>	<b>135 / 5 years</b>	<b>Revised Annual Requirement</b>	<b>-117 / 5 Years</b>	<b>-23</b>
<b>1,300</b>	<b>Supply of Housing</b>			<b>1,300</b>
1,164	1,300 - 136	Shortfall/Surplus of Supply	1,300 - -117	1,417
<b>48.15</b>	<b>1,300 / 27</b>	<b>Supply in Years</b>	<b>1,300 / -23</b>	<b>~</b>

Table 7 BDC RPA - SHMA OAN Based

<b>Liverpool</b>	<b>5 Year Housing Land Supply Assessment, April 2017</b>			<b>Sedgefield</b>
2,051	SHMA OAN 2015 - 2036			2,051
98	SHMA OAN Annual Requirement			98
196	Requirement 1 April 2015 to 31 March 2017			196
492	Completions 1 April 2015 to 31 March 2017			492
+296	Housing Shortfall/Surplus since 1 <sup>st</sup> April 2015			+296
490	SHMA 5 year requirement 2017/18 to 2021/22			490
78	296 / 19 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	296
412	490 - 78	Revised 5 Year Requirement	490 - 296	194
21	5%	Plus NPPF Buffer	5%	10
433	412 + 21	Total 5 year requirement 2017/18 to 2021/22	194 + 10	204
<b>87</b>	<b>433 / 5 years</b>	<b>Revised Annual Requirement</b>	<b>204 / 5 Years</b>	<b>41</b>
<b>1,300</b>	<b>Supply of Housing</b>			<b>1,300</b>
+867	1,300 - 433	Shortfall/Surplus of Supply	1,300 - 204	+1,096
<b>14.94</b>	<b>1,300 / 87</b>	<b>Supply in Years</b>	<b>1,300 / 41</b>	<b>31.71</b>

Table 8 BDC RPA - SHMA OAN, inc. City Deals Uplift Based

<b>Liverpool</b>	<b>5 Year Housing Land Supply Assessment, April 2017</b>			<b>Sedgefield</b>
2,554	SHMA OAN 2015 - 2036			2,554
122	SHMA OAN Annual Requirement			122
244	Requirement 1 April 2015 to 31 March 2017			244
492	Completions 1 April 2015 to 31 March 2017			492
+248	Housing Shortfall/Surplus since 1 <sup>st</sup> April 2015			+248
610	SHMA 5 year requirement 2017/18 to 2021/22			610
65	248 / 19 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	248
545	610 - 65	Revised 5 Year Requirement	610 - 248	362
27	5%	Plus NPPF Buffer	5%	18
572	545 + 27	Total 5 year requirement 2017/18 to 2021/22	362 + 18	380
<b>114</b>	<b>572 / 5 years</b>	<b>Revised Annual Requirement</b>	<b>380 / 5 Years</b>	<b>76</b>
<b>1,300</b>	<b>Supply of Housing</b>			<b>1,300</b>
+728	1,300 - 572	Shortfall/Surplus of Supply	1,300 - 380	+920
<b>11.40</b>	<b>1,300 / 114</b>	<b>Supply in Years</b>	<b>1,300 / 76</b>	<b>17.11</b>

Table 9 SNDC RPA - JCS Based

<b>Liverpool</b>	<b>5 Year Housing Land Supply Assessment, April 2017</b>			<b>Sedgefield</b>
2,368	JCS Plan Requirement 2008 - 2026			2,368
132	JCS Annual Requirement			132
1,188	Requirement 1 April 2008 to 31 March 2017			1,188
2,154	Completions 1 April 2008 to 31 March 2017			2,154
+ 966	Housing Surplus / Shortfall since 1 <sup>st</sup> April 2008			+ 966
660	JCS 5 year requirement 2017/18 to 2021/22			660
537	966 / 9 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	+966
123	660 - 537	Revised 5 Year Requirement	660 - 966	-306
6	5%	Plus NPPF Buffer	5%	15
129	123 + 6	Total 5 year requirement 2017/18 to 2021/22	-306+15	-291
<b>26</b>	<b>129 / 5 Years</b>	<b>Revised Annual Requirement</b>	<b>-291 / 5 Years</b>	<b>-58</b>
<b>1,625</b>	<b>Supply of Housing</b>			<b>1,625</b>
+1,496	1,625 - 129	Shortfall/Surplus of Supply	1,625 - -291	+1,916
<b>62.50</b>	<b>1,625 / 26</b>	<b>Supply in Years</b>	<b>1,625 / -58</b>	<b>~</b>

Table 10 SNDC RPA - SHMA OAN Based

<b>Liverpool</b>	<b>5 Year Housing Land Supply Assessment, April 2017</b>			<b>Sedgefield</b>
6,844	SHMA OAN 2015 - 2036			6,844
326	SHMA OAN Annual Requirement			326
652	Requirement 1 April 2015 to 31 March 2017			652
513	Completions 1 April 2015 to 31 March 2017			513
-139	Housing Shortfall/Surplus since 1 <sup>st</sup> April 2015			-139
1,630	SHMA 5 year requirement 2017/18 to 2021/22			1,630
37	139 / 19 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	139
1,667	1,630 + 37	Revised 5 Year Requirement	1,630 + 139	1,769
83	5%	Plus NPPF Buffer	5%	88
1,750	1,667 + 83	Total 5 year requirement 2017/18 to 2021/22	1,769 + 88	1,857
<b>350</b>	<b>1,750 / 5 years</b>	<b>Revised Annual Requirement</b>	<b>1,857 / 5 Years</b>	<b>371</b>
1,625	Supply of Housing			1,625
-125	1,750 – 1,625	Shortfall/Surplus of Supply	1,857 – 1,625	-232
<b>4.64</b>	<b>1,625 / 350</b>	<b>Supply in Years</b>	<b>1,625 / 371</b>	<b>4.38</b>

Table 11 SNDC RPA - SHMA OAN, inc. City Deals Uplift Based

<b>Liverpool</b>	<b>5 Year Housing Land Supply Assessment, April 2017</b>			<b>Sedgefield</b>
7,416	SHMA OAN 2015 - 2036			7,416
353	SHMA OAN Annual Requirement			353
706	Requirement 1 April 2015 to 31 March 2017			706
513	Completions 1 April 2015 to 31 March 2017			513
-193	Housing Shortfall/Surplus since 1 <sup>st</sup> April 2015			-193
1,765	SHMA 5 year requirement 2017/18 to 2021/22			1,765
51	193 / 19 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	193
1,816	1,765 + 51	Revised 5 Year Requirement	1,765 + 193	1,958
91	5%	Plus NPPF Buffer	5%	98
1,907	1,816 + 91	Total 5 year requirement 2017/18 to 2021/22	1,958 + 98	2,056
<b>381</b>	<b>1,907 / 5 years</b>	<b>Revised Annual Requirement</b>	<b>2,056 / 5 years</b>	<b>411</b>
1,625	Supply of Housing			1,625
-282	1,907 – 1,625	Shortfall/Surplus of Supply	2,056 – 1,625	-431
<b>4.27</b>	<b>1,625 / 381</b>	<b>Supply in Years</b>	<b>1,625 / 411</b>	<b>3.95</b>

48. Tables 6 and 9 above clearly shows that across the RPAs the supply of deliverable land at 1<sup>st</sup> April 2017 continues to significantly exceed what would be required under the JCS. Tables 7 and 8 also show that against the more recent SHMA assessment of housing need there is an ample supply of deliverable housing land in the BDC RPA at 1<sup>st</sup> April 2017. Tables 10 and 11 show that in the SNDC RPA there be a relatively small housing land supply deficit against both SHMA scenarios.

**March 2018**

Appendix A1 – Whole Greater Norwich Area Trajectory

	Greater Norwich, all sites - 2008/09 to 2025/26	Completions											Projections											Total Delivered	Total Required							
		2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26													
Past Completions	Actual Completions - Previous Years	1,736	1,237	1,168	1,182	1,238	1,241	1,676	1,728																							
	Actual Completions - Reporting Year								2,251																							
Future Supply	Projected Completions - Current Year																															
	Projected Completions - Future Years Existing Sites																															
Requirement taking into account completions	Managed delivery target - annual requirement taking account of past/projected completions	2,046	2,064	2,115	2,179	2,250	2,328	2,418	2,486	2,561	2,596	2,620	2,531	2,374	2,058	1,587	998	74														
	JCS allocation annualised over 18 years (2008 - 2026)	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046		

	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
Five Year Supply	2,401	3,243	3,476	3,953	3,943	17,016	Units		
Liverpool Five Year Requirement plus 20% (6 yrs)	3,115	3,115	3,115	3,115	3,115	15,575	Units		
							Unit Surplus		
							Yrs		
							Land		
							Supply		
							1,441		
							5.46		

## Appendix A2 – Whole Norwich Policy Area Trajectory

Description	Completions																		Projections							Total Delivered
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26								
Whole NPA, all sites - 2008/09 to 2025/26																										
<b>Past Completions</b>																										
Actual Completions - Previous Years	1,193	923	910	915	882	992	1,143	1,164																		
Actual Completions - Reporting Year								1,810																		
<b>Future Supply</b>									1,923																	
Projected Completions - Current Year																										
Projected Completions - Future Years Existing Sites										2,570	2,746	3,334	3,518	3,518	3,101	2,644	2,280	2,668								
<b>Requirement taking into account completions</b>																						34,716				
Managed delivery target - annual requirement taking account of past/projected completions	1,825	1,862	1,921	1,988	2,065	2,156	2,253	2,354	2,473	2,546	2,624	2,632	2,613	2,468	2,206	1,908	1,540	799								
JCS allocation annualised over 18 years (2008 - 2026)	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	32,847				

	1,923	2,570	2,746	3,334	3,518	14,091	Units
Five Year Supply	3,056	3,056	3,056	3,056	3,056	15,278	Units
JCS Five Year Requirement plus 20% (6 yrs)							
						-1,187	Unit Surplus Yrs
						4.61	Land Supply

Appendix A3 – Broadland Norwich Policy Area Trajectory

	Completions											Projections						Total Delivered	
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25		2025/26
Broadland NPA, all sites - 2008/09 to 2025/26																			
13 December 2017 Draft																			
Actual Completions - Previous Years	104	84	81	157	56	217	217	340											
Actual Completions - Reporting Year								410											
Projected Completions - Current Year									463										
Projected Completions - Future Years										564	879	1,448	1,630	1,556	1,297	1,037	1,181		
Existing Sites																			
Managed delivery target - annual requirement taking account of past/projected completions	617	647	682	722	762	817	867	926	984	1,048	1,201	1,255	1,216	964	798	559			
JCS allocation annualised over 18 years (2008 - 2026)	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617

	463	564	879	1,448	1,630	4,984	Units
Five Year Supply	1,258	1,258	1,258	1,258	1,258	6,289	Units
JCS Five Year Requirement plus 20% (6 yrs)						-1,305	Unit Surplus
						3.96	Yrs Land Supply



Appendix A4 – Norwich Trajectory

	Completions										Projections						Total Delivered	
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24		2024/25
Norwich, all sites - 2008/09 to 2025/26																		
13 December 2017 Draft																		
Actual Completions - Previous Years	527	399	377	280	407	210	252	365										
Actual Completions - Reporting Year									445									
Projected Completions - Current Year										428								
Projected Completions - Future Years Existing Sites											902	675	797	914	495	462	488	832
Managed delivery target - annual requirement taking account of past/projected completions	477	474	479	486	501	508	533	558	578	592	613	571	554	506	404	373	329	169
JCS allocation annualised over 18 years (2008 - 2026)	477	477	477	477	477	477	477	477	477	477	477	477	477	477	477	477	477	477

Five Year Supply		428	902	675	797	914	3,716	Units
JCS Five Year Requirement plus 20% (6 yrs)		711	711	711	711	711	3,553	Units
	Unit Surplus						163	Yrs
	Land Supply						5.23	Supply

Appendix A5 – South Norfolk Norwich Policy Area Trajectory

	Completions										Projections						Total Delivered		
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24		2024/25	2025/26
South Norfolk NPA, all sites - 2008/09 to 2025/26																			
13 December 2017 Draft																			
Actual Completions - Previous Years	562	440	452	478	419	565	674	459											
Actual Completions - Reporting Year								955											
Projected Completions - Current Year									1,032										
Projected Completions - Future Years										1,104	1,192	1,089	974	1,050	885	755	655		
Existing Sites																			
Managed delivery target - annual requirement taking account of past/projected completions	731	741	760	780	802	831	853	870	911	906	890	859	804	747	690	570	413	71	
JCS allocation annualised over 18 years (2008 - 2026)	731	731	731	731	731	731	731	731	731	731	731	731	731	731	731	731	731	731	731

	Five Year Supply	1,032	1,104	1,192	1,089	974	5,391	Units
	JCS Five Year Requirement plus 20% (6 yrs)	1,087	1,087	1,087	1,087	1,087	5,435	Units
							-44	Unit Surplus
							4.96	Yrs Land Supply

## **APPENDIX 3**

**Greater Norwich Technical Report –  
Economic Geography (Barton Willmore, March 2018)**

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# GREATER NORWICH TECHNICAL REPORT – ECONOMIC GEOGRAPHY

MARCH 2018

**GREATER NORWICH**  
**TECHNICAL REPORT – ECONOMIC GEOGRAPHY**  
**March 2018**

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## 1.0 INTRODUCTION

1.1 This Technical Report has been prepared by Barton Willmore on behalf of Landstock Estates Ltd and Landowners Group Ltd.

1.2 The purpose of this report is to provide a robust evidence base to support representations being made to the Regulation 18 consultation for the emerging Greater Norwich Local Plan (GNLP). This report specifically responds to matters relating to economic geography, and identifies the functional relationships between places that should inform the approach to high level spatial planning within the GNLP. The report is structured as follows:

- Section 2, **Policy Context**, identifies the key aspects of national planning policy and guidance relating to the definition of housing/economic market areas and sustainable travel, as well as reviewing the spatial planning options put forward by the emerging GNLP;
- Section 3, **Functional Economic Relationships**, provides independent analysis of the economic linkages that exist within the GNLP, with a focus on travel to work flow patterns;
- Section 4, **Economic Outlook**, considers employment forecasts for the GNLP area, alongside economic themes emerging from the GNLP and initiatives such as the Cambridge Norwich Tech Corridor, to identify the spatial pattern of future employment growth within the plan area;
- Section 5, **Conclusions**, draws together the evidence summarised in the preceding sections, establishing the implications for spatial planning within the emerging GNLP.

1.3 An additional report prepared by GVA/Hatch on behalf of Norwich City Council is also provided at Appendix 1. The GVA/Hatch report covers similar themes to this report, and provides further evidence on the spatial economics of Greater Norwich.

## 2.0 POLICY CONTEXT

### i) Current National Policy and Guidance

#### *National Planning Policy Framework, March 2012*

2.1 The National Planning Policy Framework (NPPF) makes numerous references to the need to fully understand development needs across the relevant geographic area, which does not necessarily correspond to an administrative boundary. Paragraphs 159 (Housing) and 160 (Employment) provide clear direction on this issue:

**“Local planning authorities should have a clear understanding of housing needs in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries”** (NPPF, Paragraph 159, Our Emphasis)

**“Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area”** (NPPF, Paragraph 160, Our Emphasis)

2.2 Sustainable development is central to the NPPF, and much of its content is geared towards achieving this objective. This includes promoting solutions which deliver environmental benefits such as reduced greenhouse gas emissions, reduced congestion and shorter journeys to work:

**“Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”** (NPPF, Paragraph 30, Our Emphasis)

**“Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.”** (NPPF, Paragraph 37, Our Emphasis)

2.3 The NPPF clearly demonstrates a requirement for Housing and Economic Development needs to be assessed across geographic areas which reflect the extent of the market for each type of property. Within these markets, the NPPF is also clear that more sustainable spatial planning options should be preferred over less sustainable options, and this includes taking steps to minimise the distance residents need to travel to access employment, shopping and services.



***Planning Practice Guidance, Housing and Economic Development Needs Assessments, March 2015***

2.4 The Planning Practice Guidance (PPG) expands on the content of the NPPF, providing further details on how the approach of the NPPF is expected to be put into practice.

2.5 Building on the NPPF requirement to assess need across market areas, rather than simply within administrative boundaries, PPG states that:

**“Local planning authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries.”** (PPG, ID: 2a-007-20150320, Our Emphasis)

2.6 Further to this, PPG defines a housing market area in the following way:

**“A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.”** (PPG, ID: 2a-010-20140306, Our Emphasis)

2.7 PPG also provides a definition of markets for employment-sustaining commercial property:

**“The geography of commercial property markets should be thought of in terms of the requirements of the market in terms of the location of premises, and the spatial factors used in analysing demand and supply – often referred to as the functional economic market area.”** (PPG, ID: 2a-012-20140306, Our Emphasis)

2.8 Paragraph 12 then goes on to provide a list of factors which could be taken into account when defining a functional economic market area:

- **extent of any Local Enterprise Partnership within the area;**
- **travel to work areas;**
- **housing market area;**
- **flow of goods, services and information within the local economy;**
- **service market for consumers;**
- **administrative area;**
- **catchment areas of facilities providing cultural and social well-being;**
- **transport network.”** (PPG, ID: 2a-012-20140306)

- 2.9 Finally, PPG identifies the potential consequences of failing to provide sufficient homes in the correct locations to support economic growth (by failing to allow the labour force within the market area to grow sufficiently to meet demand):

**“Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems.”** (PPG, ID: 2a-018-20140306)

- 2.10 Though it is clear from both NPPF and PPG that housing and economic development needs should be assessed and then met across the functional market area, in reality the nature of planning means that a ‘best fit’ approach is often required – meaning that Housing Market Areas and Functional Economic Market Areas are normally based on the extents of one or more Local Authority boundaries. Nevertheless, it is important that this pragmatic necessity does not undermine the intention of national policy and guidance – to ensure that homes and business premises are located in the areas where they are needed.

**ii) Draft Updates to National Policy and Guidance, March 2018**

- 2.11 Following consultation on the Government’s Housing White Paper (entitled ‘fixing our broken housing market’) in late 2017, the Ministry for Housing, Communities and Local Government published a draft revised NPPF in March 2018, with consultation running until May 2018. Draft updates to the PPG were also published for issues relating to the major changes outlined in the draft revised NPPF.
- 2.12 One of the headline changes within the revised NPPF is the introduction of a standard approach to the assessment of housing needs. Whereas need was previously determined within Strategic Housing Market Assessments (SHMAs) on an HMA-by-HMA basis, following the principles of Objectively Assesses Housing Need (OAHN), the emerging standardised approach means that housing need for each local authority will be determined by a standard formula to be applied on a consistent basis nationally. As such, the role of the SHMA is likely to change, focusing more on determining the types of homes needed in each area rather than the overall number of homes.

- 2.13 Another key change being consulted on is the introduction of a 'statement of common ground' at the plan-making stage, which can be seen as reinforcing the Duty to Cooperate. According to the updated PPG, the purpose of the statement of common ground is as follows:

**"A statement of common ground is a written record of the progress made by strategic plan-making authorities during the process of planning for strategic matters across local authority boundaries. It documents where effective co-operation is and is not happening, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. In the case of local planning authorities (including County Councils), it is also evidence that they have complied with the duty to cooperate." (Draft PPG, p.38, Our Emphasis)**

- 2.14 According to the draft PPG, the statement should include justification for the geographic extent assumed:

**"[A statement should contain...] A written description and map showing the location and administrative areas covered by the statement, and a justification for these areas" (Draft PPG, p.39)**

- 2.15 Finally, draft PPG indicates an approach to determining which areas need to be included within the statement:

**"The statement will need to cover the area which local planning authorities and Mayors or combined authorities with plan-making powers feel is the most appropriate functional geography for gathering of evidence and the preparation of planning policies." (Draft PPG, p40, Our Emphasis)**

- 2.16 The draft revisions to national policy and guidance suggest that significant change is expected in the way that housing needs for functional market areas are identified. Nevertheless, it appears that cross-boundary working remains expected, and the introduction of the statement of common ground at the plan-making could result in more robust collaboration between groups of authorities.

### **iii) Emerging Greater Norwich Local Plan – Regulation 18 Consultation**

- 2.17 As stated in the introduction section to this Technical Report, the Greater Norwich Local Plan (GNLP) is being jointly prepared by Norwich City Council, Broadland District Council and South Norfolk Council (alongside Norfolk County Council) – a group collectively known as the Greater Norwich Development Partnership (GNDP). As part of the Regulation 18 consultation on the GNLP, the GNDP has published a number of documents for consultation, including a Growth Options document and an Interim Sustainability Appraisal.

- 2.18 The Growth Options document sets out a range of high level spatial planning options that could form the basis of policy within the GNDP as it progresses towards examination and adoption.
- 2.19 Paragraphs 4.165 and 4.166 of the Growth Options document comment on the findings of the June 2017 Central Norfolk Strategic Housing Market Assessment (SHMA) relating to Housing Market Area (HMA) definitions. Although the SHMA finds clear evidence of a 'core' HMA focused on the urban area of Norwich (and not dissimilar in extent to the long-standing Norwich Policy Area - NPA), the Growth Options document contends that only the wider area incorporating the three GNLP local authorities in full should be considered to represent an HMA. As a result, the document argues that it would be unreasonable to retain the NPA as a means of monitoring 5 year housing land supply.
- 2.20 According to the Growth Options document, there is a need to identify sites for an additional 7,200 homes, as a result of the difference between the Objectively Assessed Housing Need (OAHN) derived via the Government's Standardised Housing Need Assessment Methodology and the capacity of housing sites already permitted or allocated within earlier plans. It is beyond the scope of this Technical Report to assess the validity of this figure, and it is therefore taken as read.
- 2.21 Six options are advanced for how these additional homes could be delivered:
- Option 1: Concentration Close to Norwich;
  - Option 2: Transport Corridors;
  - Option 3: Supporting the Cambridge to Norwich Tech Corridor;
  - Option 4: Dispersal (to service and other villages);
  - Option 5: Dispersal plus New Settlement;
  - Option 6: Dispersal plus Urban Growth.
- 2.22 The Growth Options document considers all six options to be 'reasonable alternatives' to one another. Options 1-3, according to the document, are considered to be more sustainable (with homes being delivered closer to the Norwich urban area, where the largest number of jobs and services are located), whilst options 4 and 5 are considered to have a better chance of delivery (on the basis that some long standing allocations close to the Norwich urban area have not been brought forward), would increase the diversity of locations where development is expected to take place, and provide more opportunities for rural living. Option 6 is considered to be an intermediate option with features of all other options.

2.23 The document also discusses the future role of the defined geographic areas used with previous policies and evidence base studies, including the Norwich Policy Area (NPA), the Central Norfolk Housing Market Area (HMA), the Core Area within the HMA (p.53). As noted above, the revised NPPF is likely to see the role of HMAs change somewhat, but it will remain important that neighbouring authorities with strong links such as the GNDP authorities work together. Though the Growth Options document contends that the NPA should not continue to be used for planning purposes, it is considered reasonable that a Norwich centred policy area of some form could be used within the GNLP (pp.53-54).

#### iv) Policy Context – Key Issues

2.24 This section has highlighted the approach of national planning policy and guidance alongside the approach taken within the emerging GNLP. The key issues relating to economic geography and spatial planning emerging from the emerging GNLP, to be considered in further detail by this Technical Report, are:

- **The future role of the NPA** – The Growth Options document suggests that the NPA, in its current role, should not be retained. It is suggested, however, that a Norwich-focused policy area could be retained in some capacity.
- **The most appropriate option for allocating additional housing growth** – The Growth Options document also acknowledges a need to make additional housing allocations following the announcement of the Government’s standardised housing need assessment methodology. Six options are put forward, reflecting different approaches to spatial planning, and all are considered to be reasonable alternatives to one another.

### 3.0 FUNCTIONAL ECONOMIC RELATIONSHIPS

3.1 This section provides analysis of the functional economic relationships within the Greater Norwich area. As identified in Section 2, travel to work flows are a key indicator, reflecting the relationships between places where people live and places where people work. For the majority, travelling to work involves motorised transport of some form, be it private car use or public transport, and this therefore has sustainability implications.

#### i) Central Norfolk SHMA (2015 and 2017)

3.2 The Central Norfolk SHMA (2015, updated in 2017), is the key evidence base document relating to housing need for the GNLP area. Though the 2017 update is substantial, both documents take the same approach to defining Norwich's HMA and are therefore considered together.

3.3 The 2015 SHMA provides a full discussion of the steps taken to define an HMA for the Greater Norwich area. A number of different data sources are considered, including:

- NHPAU/CURDS – Geography of Housing Market Areas in England;
- Local Authority boundaries;
- Broads Authority boundary;
- Census 2011 Commuting Flows;
- VOA Broad Rental Market Areas.

3.4 ORS, the author of the SHMA, also produces a bespoke set of HMA definitions for the Norfolk/Suffolk area based primarily on Census 2011 data (with reference to some of the other data sources above). This HMA definition is defined by determining the self-containment of each settlement (i.e. the number of people who both live and work within a settlement). This highlights key locations which attract labour from outside, including Norwich, Great Yarmouth, Lowestoft, King's Lynn, Bury St, Edmunds and Ipswich. The extent to which smaller locations are attracted to these key locations is then established, allowing HMA boundaries to be defined once an acceptable degree of containment is reached at the HMA level.

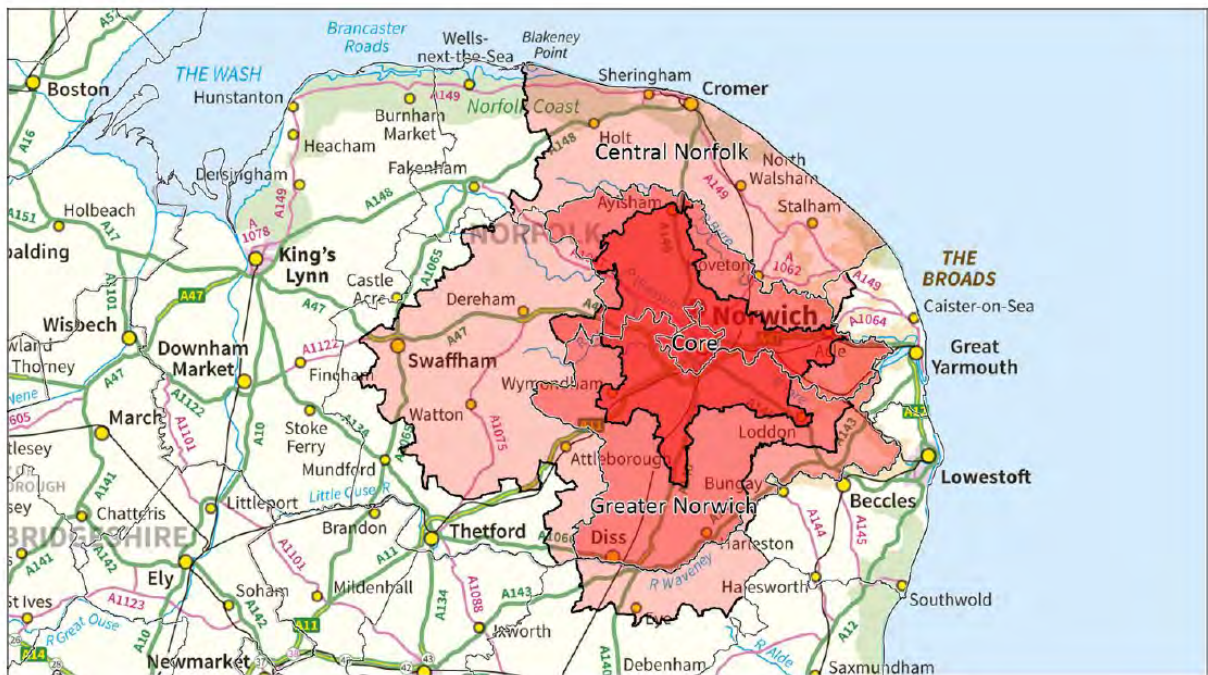
3.5 Ultimately, the SHMA recommends a three 'stage' HMA definition:

- Core – incorporating settlements with the strongest links to Norwich, and similar in extent to the NPA. According to the SHMA, 85% of home movers from the Core area remain in the core area;

- Greater Norwich – a version of the full Central Norfolk (see below) HMA, restricted to the boundaries of Norwich City, Broadland and South Norfolk;
- Central Norfolk – Full extent of the HMA, based on ORS analysis. According to the SHMA, 93% of home movers from this area remain in the same area.

3.6 These HMA definitions are shown on Figure 3.1 below:

**Figure 3.1: SHMA HMA Definitions**



Source: ORS, Central Norfolk SHMA 2015

3.7 In summary, the SHMA provides a robust justification for the HMA definitions it employs for the purpose of assessing housing need. Whilst the core area meets the requirements for representing a functional HMA for Norwich on its own, the remaining areas of the wider HMA are not sufficiently self-contained to be considered as separate HMAs. As such, it is important to consider need for both the core area and the wider area. Though the SHMA contends that the Central Norwich HMA (which incorporates the GNLPA authorities plus parts of a number of surrounding authorities), the Greater Norwich HMA is also considered a suitable definition for policy-making purposes.

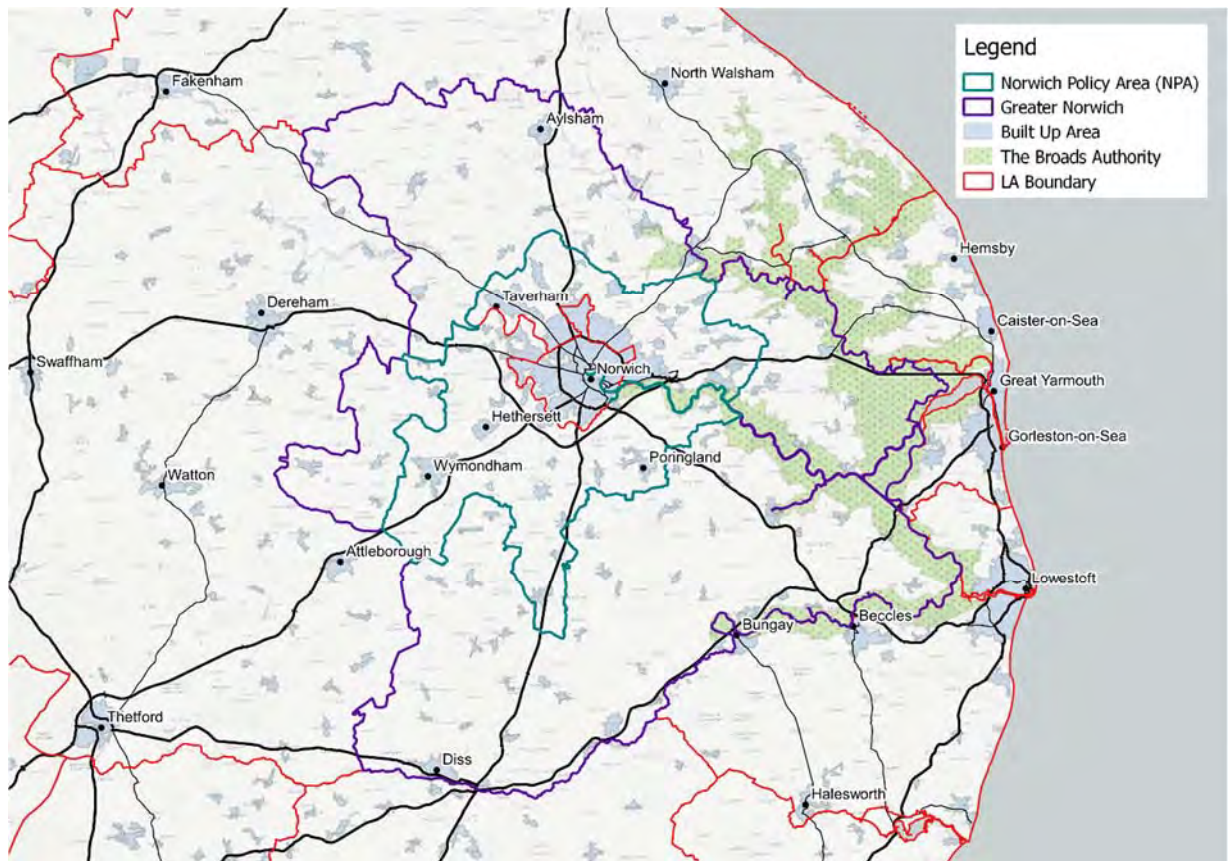
## ii) Further Analysis

3.8 Though the 2015 Central Norfolk SHMA provides a robust defence of the HMA definition assumed, it is considered necessary to carry out additional independent analysis to respond specifically to the key issues identified in Section 2 of this report (the continued relevance of the NPA and the suitability of the six spatial planning options).

## Context

- 3.9 Figure 3.2 below shows the extent of the existing Norwich Policy Area (NPA) within the Greater Norwich area. Major roads and larger settlements (with a population greater than 5,000) are also shown for context, as well as the boundaries of other Local Authorities and the Broads Authority.

**Figure 3.2: Context Plan**

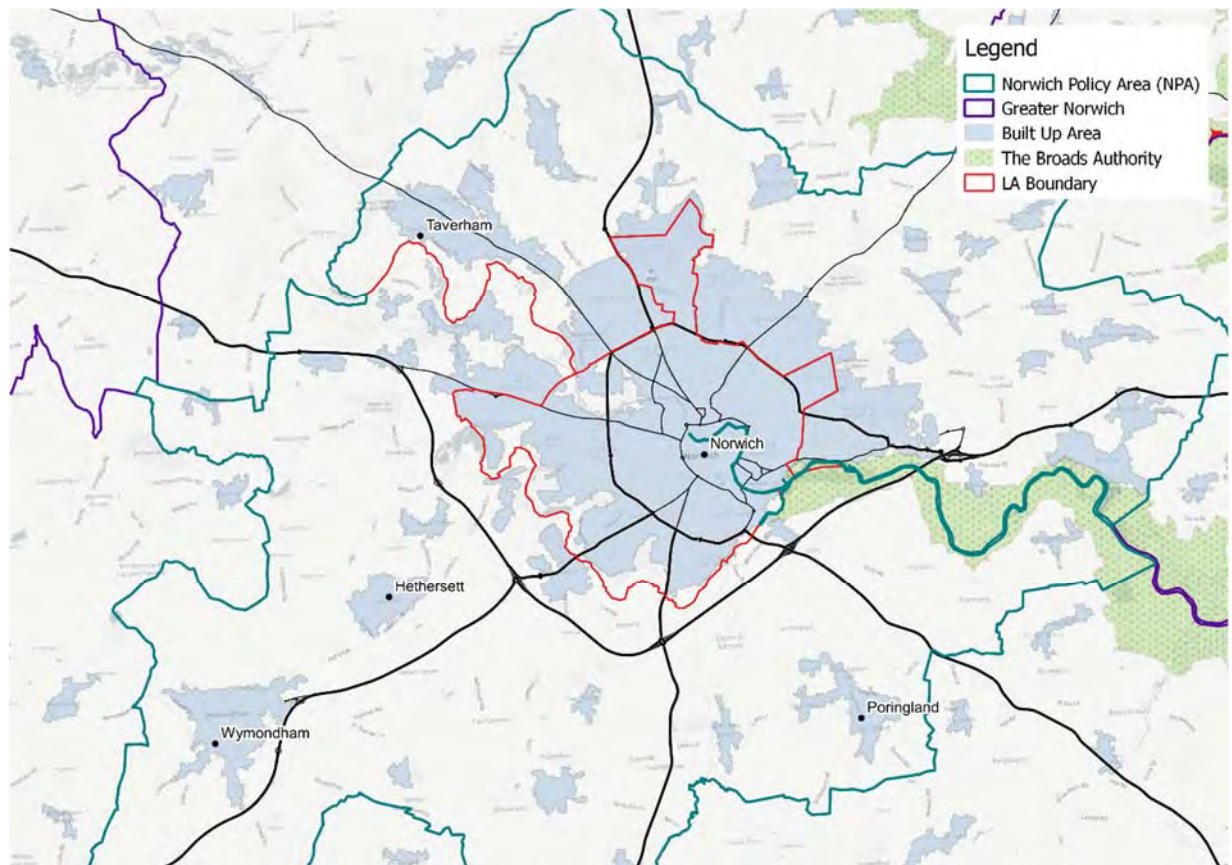


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- 3.10 The majority of larger settlements are located within the NPA; Diss and Aylsham are the only other settlements whose built up area populations<sup>1</sup> exceed 5,000 residents. Within the NPA, the largest built up areas outside of Norwich are Taverham and Wymondham, followed by Hethersett and Poringland.
- 3.11 Figure 3.3 below focuses on the Norwich urban area.

<sup>1</sup> Defined using ONS 2011 Built Up Area definitions



**Figure 3.3: Context Plan – Norwich Urban Area**

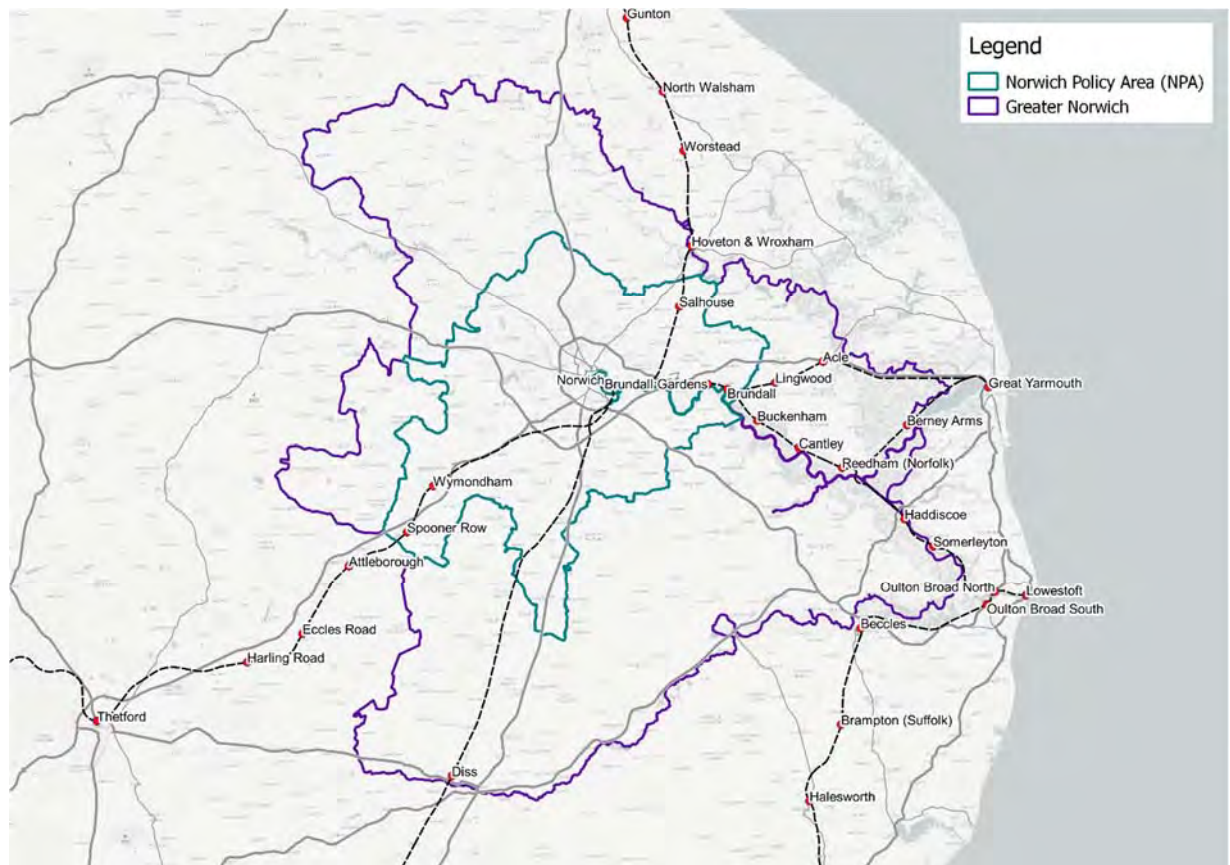
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- 3.12 From Figure 3.3 it is clear that the existing administrative boundary of Norwich City does not reflect the full extent of the city, resulting in large parts of the contiguous urban area falling within Broadland and South Norfolk. This is particularly apparent to the north of the city. One third of Norwich's urban area<sup>2</sup> (19 sq. km) falls outside of the City Council boundary (primarily in Broadland), accounting for 28% of the Built Up Area's population.

### *Travel to Work Flows*

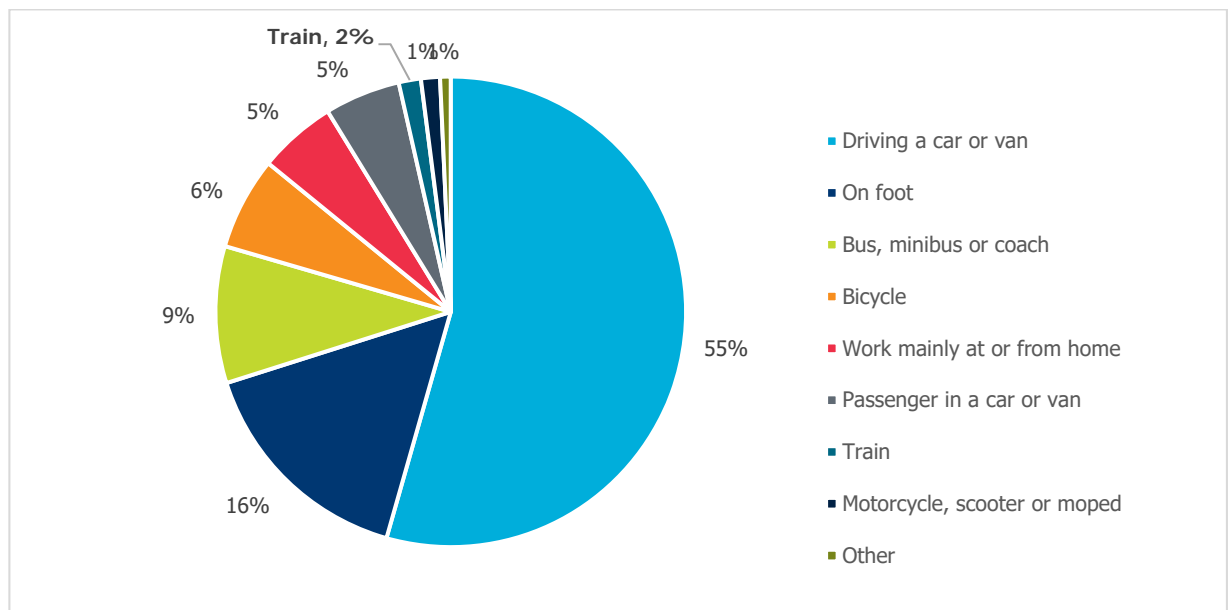
- 3.13 As highlighted in Section 2, spatial planning strategies should promote development in sustainable locations where travel times to employment, education and other services are minimised. Public transport use should also be encouraged. Figure 3.4 below shows the existing rail corridors within the Greater Norwich area.

<sup>2</sup> Based on the ONS 2011 Built Up Area Sub-division definition for Norwich

**Figure 3.4: Rail Connections**

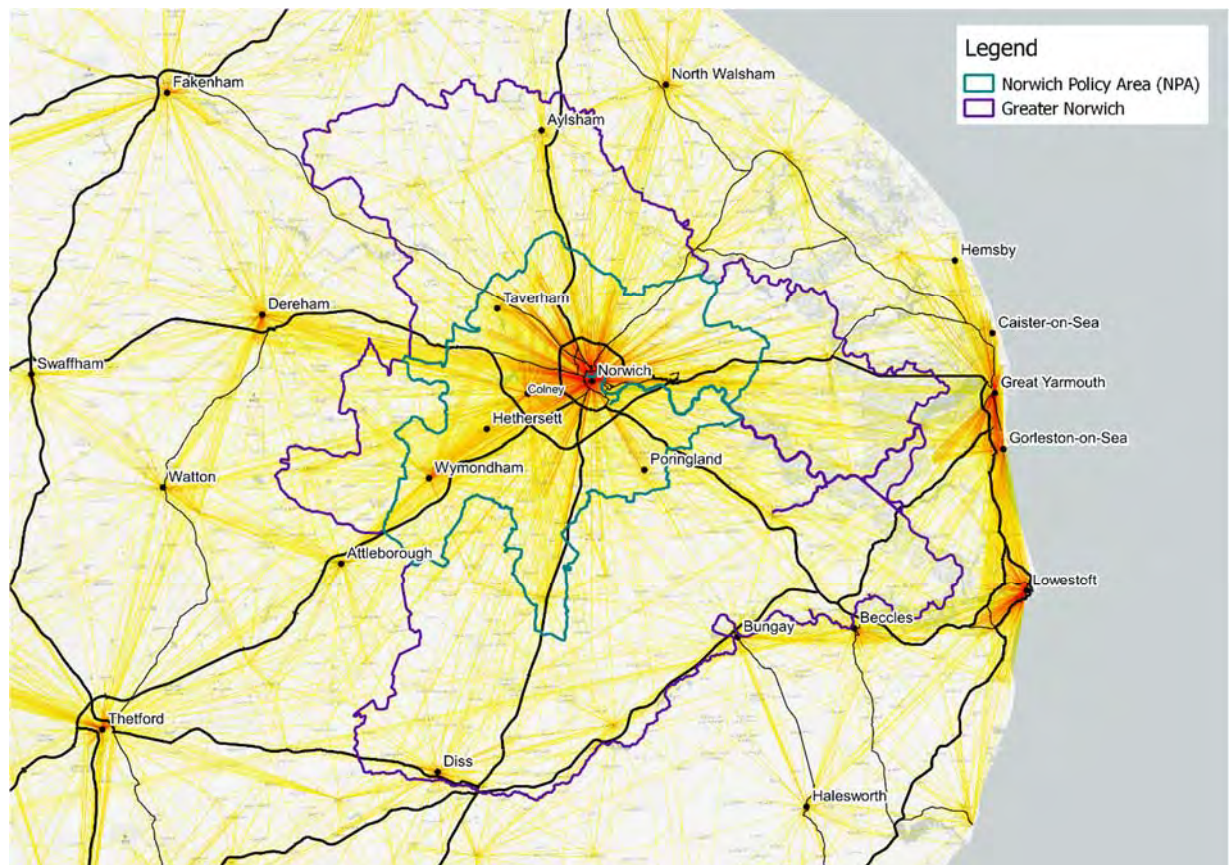
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- 3.14 Norwich serves as a hub for several lines, and benefits from direct links to London and other major destinations in the East of England and beyond. Though there are many stations along the rural lines to the north and east of Norwich, there are just five stations in total within the NPA: Salhouse to the north, Brundall Gardens and Brundall to the east, and Wymondham and Spooner Row to the south west.
- 3.15 Figure 3.5 compares the various methods of travel to work for those working at workplaces within Norwich City's administrative boundary, based on data from the 2011 Census.

**Figure 3.5: Census 2011 – Method of Travel to Work (Jobs in Norwich City)**

Source: ONS, Census 2011 - WP703EW - Method of travel to work

- 3.16 The lack of rail services serving the NPA means that less than 2% of Norwich workers arrive by train (less than half the national average of 5%). This suggests that scope may exist to encourage development in locations with railway stations. Bus use, however, is above average, and cycle commuting is more than double the national average.
- 3.17 Figure 3.6 below shows the patterns of commuting in and around Greater Norwich, based on analysis of origin-destination travel to work flow data from the 2011 Census.

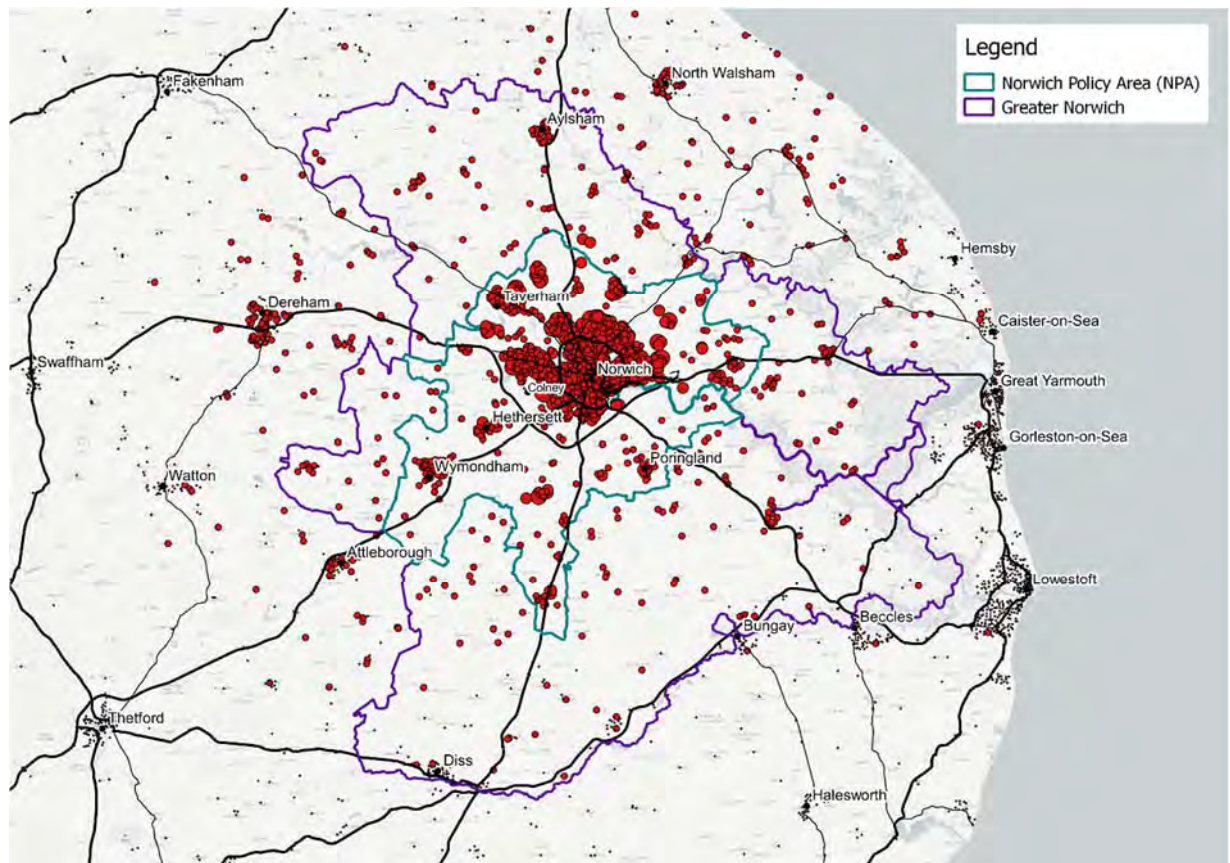
**Figure 3.6: Travel to Work Flows**

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Source: ONS, Census 2011

- 3.18 Norwich attracts strong commuting flows from within the NPA. Whilst the strongest flows appear to be contained within the A47, there are also strong flows along the main arterial routes into the city – particularly along the A11 from the south east. There are also some relatively strong flows from outside of the HMA – particularly from Dereham to the west (which falls within the SHMA’s wider Central Norfolk HMA). Conversely, relatively few people appear to be travelling from Diss, Bungay and Beccles on the southern edge of the HMA.
- 3.19 In addition to the main part of urban Norwich, the Colney area to the south west also attracts significant numbers of in-commuters, largely due to the presence of a number of large employers (including the Norfolk and Norwich Hospital, the University of East Anglia and the Norwich Research Park).
- 3.20 The influence of Norwich reduces with distance travelled. To the east, Lowestoft and Great Yarmouth have a greater influence on the coastal population than Norwich, whilst Fakenham and Thetford to the north west and south west respectively also appear to have relatively limited links to Norwich.

- 3.21 Figure 3.7 below isolates the data for Norwich, showing the home locations of those working within the Norwich urban area. Larger points indicate a greater number of Norwich workers resident in that area.

**Figure 3.7: Origins of Norwich workers**

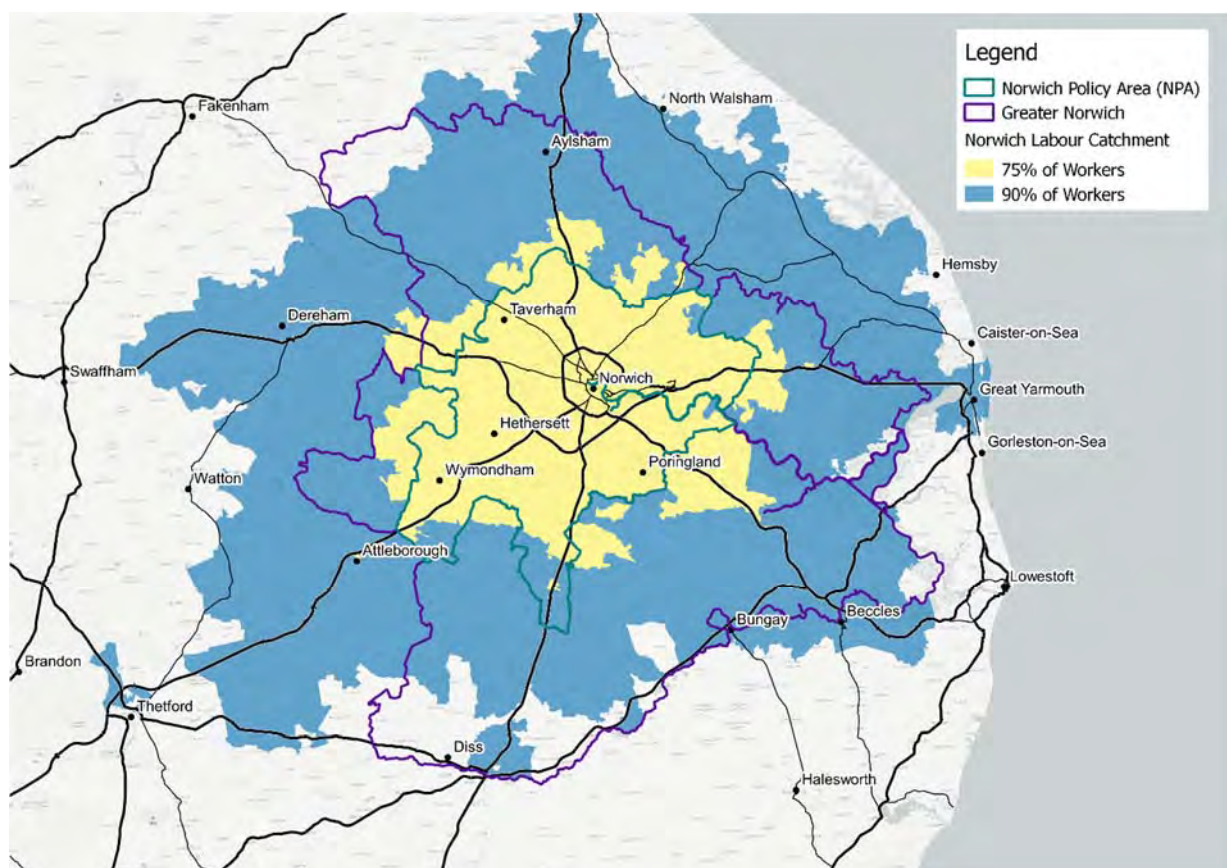


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Source: ONS, Census 2011

- 3.22 This analysis indicates that 71% of Norwich workers live within the NPA, and a further 10% live within the remainder of the Greater Norwich HMA, indicating containment of 81% within the HMA as a whole.
- 3.23 According to the ONS, an area with 75% self-containment and an economically-active population of at least 3,500 can be considered to represent a Travel to Work Area (TTWA), though containment rates as low as 66.7% are permitted for larger areas with economically-active populations in excess of 25,000 (as is the case here). As such, the NPA can be considered to broadly represent a TTWA.
- 3.24 As discussed in section 2, the NPA is an historic construct that has formed part of local planning policy in this area for decades following the introduction of Structure Plans in the 1970s. To test the continued validity of its extent, we have carried out further analysis of the travel to work flow data combined with drive time analysis.

- 3.25 For each flow originating from an 'output area' (a small unit of geography devised by the ONS statistical purposes) within 90 minutes' drive of Norwich<sup>3</sup>, the drive time into central Norwich has been calculated. This provides an indication of accessibility, taking into account factors such as availability and quality of infrastructure (i.e. the road network) and physical geography such as rivers, valleys and hills which affect route layout.
- 3.26 Travel to work flows are then ranked, from shortest to longest journey time. Containment thresholds 75% and 90% are then applied to create a 'catchment area' for Norwich's labour force. The 75% catchment area is equivalent to the containment rate of a TTWA (as discussed above). Beyond 90%, flows become more widely dispersed and of less practical use in defining the extent of Norwich's labour market. Figure 3.8 below shows the extend of these zones.

**Figure 3.8: Norwich Labour Market Definition – Drive-Time Based**



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Source: Experian, Off-Peak Drive Time model

- 3.27 The 75% catchment area is broadly similar in overall extent to the NPA, though extends slightly further along the main arterial roads. The 90% area, beyond which travel to work flows are more widely dispersed, demonstrates the wider influence of Norwich.

<sup>3</sup> More distant flows have been excluded, as they do not represent typical, sustainable commuting behaviour

**iii) Functional Economic Relationships - Summary**

- 3.28 It is clear from the analysis above that there is a strong case in favour of a 'core' area being designated, where links into Norwich are strongest. Both the SHMA and our independent analysis have identified areas which broadly correspond to the extent of the NPA. Whilst functional economic relationships may have changed since the NPA was initially defined, it is questionable whether it is necessary to define a new core area given that the NPA continues to retain a high degree of self-containment.
- 3.29 The analysis in this section has also highlighted the important of transport infrastructure in directing growth. There are strong travel to work flows into Norwich along the main road routes into the city, though rail usage is very low among Norwich commuters owing in part to the lack of stations within the NPA.

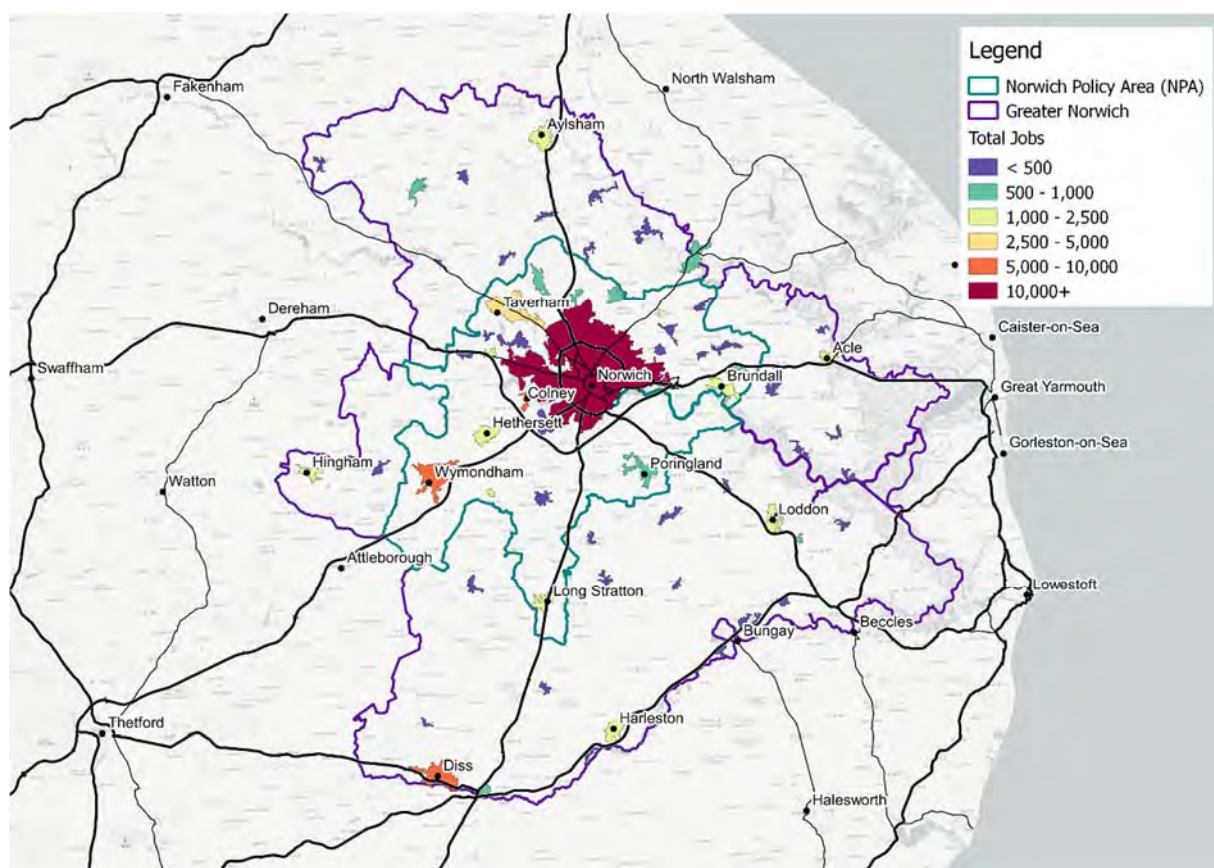
## 4.0 ECONOMIC OUTLOOK

4.1 The previous section reviewed the economic geography of Greater Norwich based on historic data, focusing on the functional relationships between Norwich as a workplace and the home locations of its workers. The future delivery of jobs, however, could have an impact where development needs to be located – particularly if growth is expected to be focused on other settlements.

### i) Jobs Distribution

4.2 Figure 4.1 below shows the current distribution of jobs within Greater Norwich.

**Figure 4.1: Current Distribution of Jobs**



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Source: ONS, Census 2011 (Workplace Data)

4.3 At present, the areas<sup>4</sup> with the most jobs are in and around the Norwich urban area. This includes areas such as Colney (to the south west of the city, where Norwich Research Park and Norfolk and Norwich Hospital are located). Beyond Norwich and its immediate fringe, the settlements with the largest numbers of jobs are Wymondham and Diss, followed by Taverham.

<sup>4</sup> Built Up Areas and Built Up Area Subdivisions, as defined by the ONS

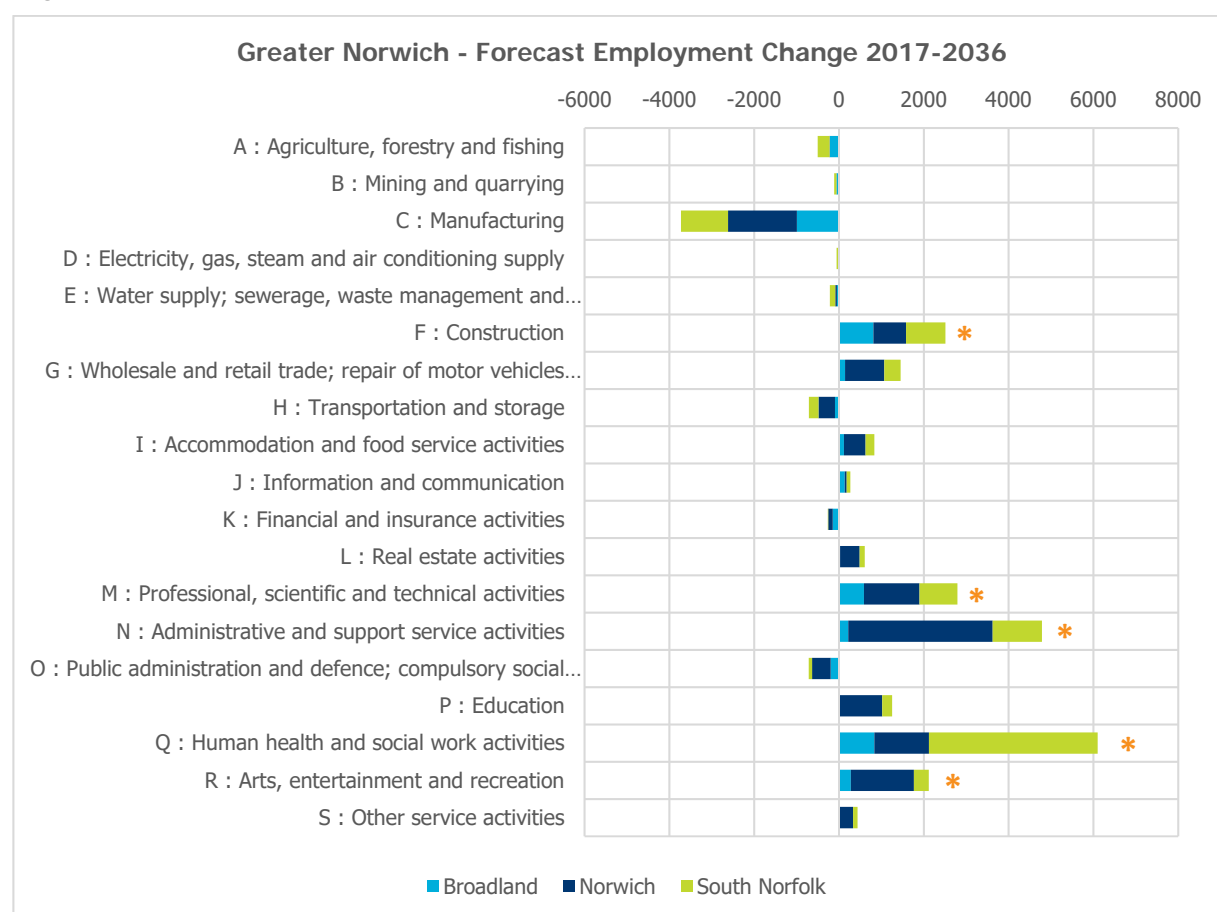


There are also a number of settlements within the NPA which fall within the 1,000 – 2,500 jobs bracket – namely Hethersett, Long Stratton and Brundall. According to the 2011 Census, 81% of jobs in the Greater Norwich area are located within the NPA and 66% within the Norwich urban area.

## ii) Employment Forecast

4.4 In order to understand how the distribution of jobs within the Greater Norwich area might change over the course of the GNLP plan period, employment forecasts from Oxford Economics have been consulted. Figure 4.2 below summarises this forecast by sector.

**Figure 4.2: Economic Outlook**



Source: Oxford Economics

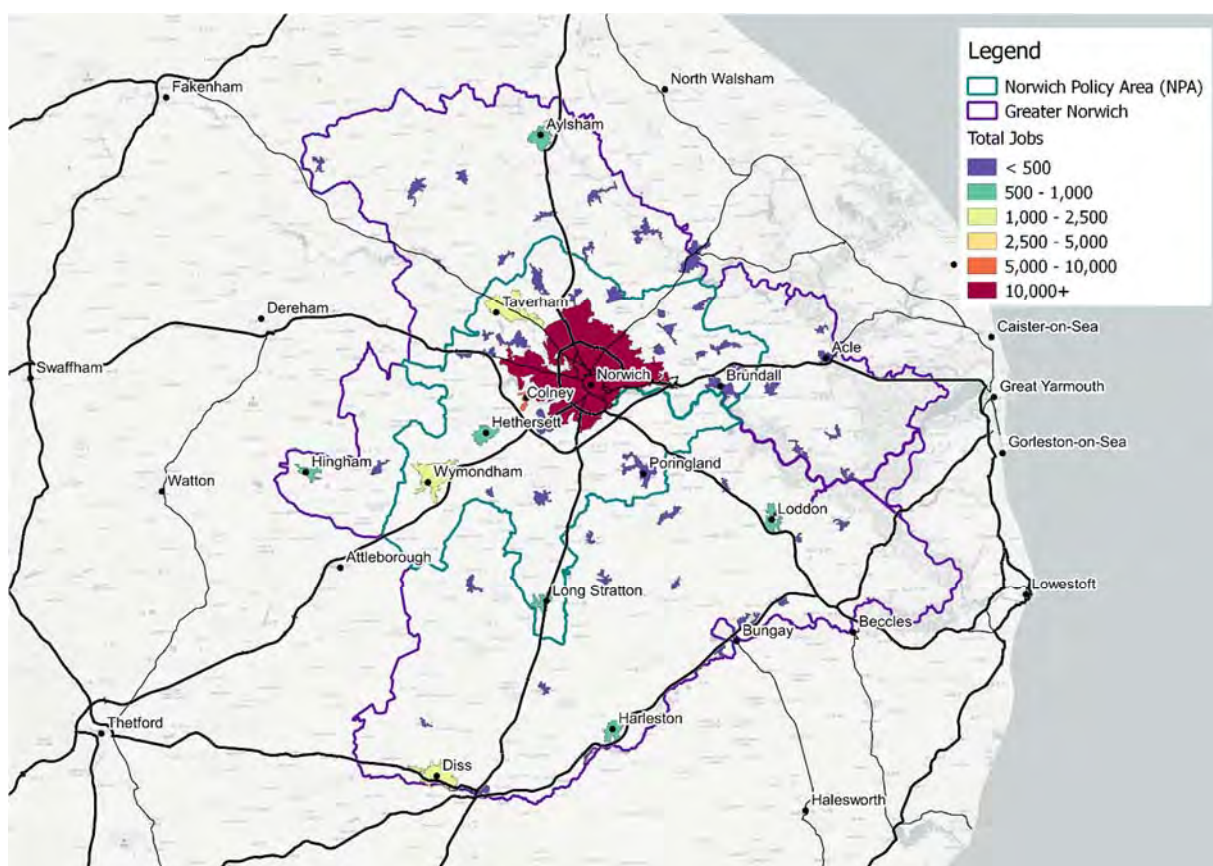
4.5 At the aggregate level, Oxford Economics forecast net growth in employment of c.17,000 over the course of the plan period, including net losses in a number of sectors (most notably Manufacturing – a national trend). The vast majority of jobs are expected to be created in Norwich and South Norfolk, with much more modest growth in Broadland.

4.6 At the sector level, a total of five sectors are expected to create more than 2,000 jobs over the plan period:

- Human Health and Social Work Activities;
- Administrative and Support Activities;
- Professional, Scientific and Technical Activities;
- Construction;
- Arts, Entertainment and Recreation.

4.7 The current spatial distribution of employment in these five main growth sectors, as observed in the 2011 Census, is shown in Figure 4.3 below.

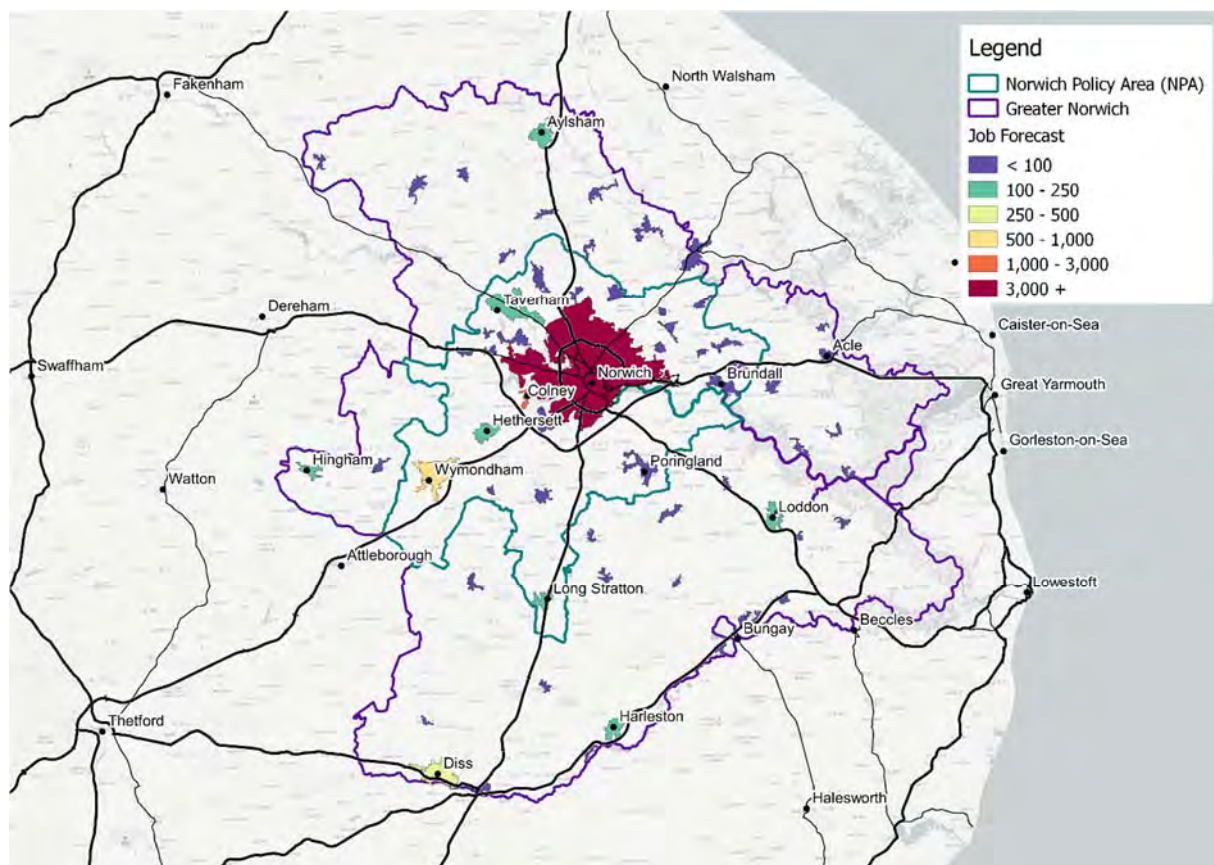
**Figure 4.3: Existing Concentrations of Main Growth Sectors**



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Source: ONS, Census 2011 (Workplace Data)

4.8 The vast majority (81%) of existing jobs in these main growth sectors are located within the NPA, with the Norwich urban area again accounting for the largest share (58%). Figure 4.4 shows how the forecast growth in these sectors might be distributed, assuming that job growth occurs in the same locations as existing jobs.

**Figure 4.4: Forecast Distribution of Main Growth Sectors**



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Source: Oxford Economics, ONS - Census 2011 (Workplace Data)

- 4.9 Again, the spatial pattern of growth appears to emphasise locations within or close to Norwich, and a large majority (83%) of forecast jobs being located within the NPA (58% in the Norwich urban area).
- 4.10 Table 4.1 summarises the total number of jobs, total existing jobs in the 5 growth sectors and forecast growth across the 5 growth sectors for the 10 largest employment areas (by total number of jobs).

**Table 4.1: Total Jobs, Growth Sector Jobs and Forecast Jobs**

Built Up Area	Total Jobs (All Sectors)	Current Jobs (5 Growth Sectors)	Forecast Job Growth (5 Growth Sectors)
Norwich	114,200	37,100	9,750
Colney	8,700	7,950	2,700
Wymondham	7,200	2,400	700
Diss	5,300	1,650	450
Taverham	3,150	1,500	200
Aylsham	2,350	1,000	150
Long Stratton	2,250	800	250
Hingham	1,100	600	150
Harleston	1,650	550	150
Hethersett	1,600	550	150
<i>Others</i>	<i>25,500</i>	<i>10,150</i>	<i>2,100</i>
<b>Total</b>	<b>173,000</b>	<b>64,250</b>	<b>16,750</b>

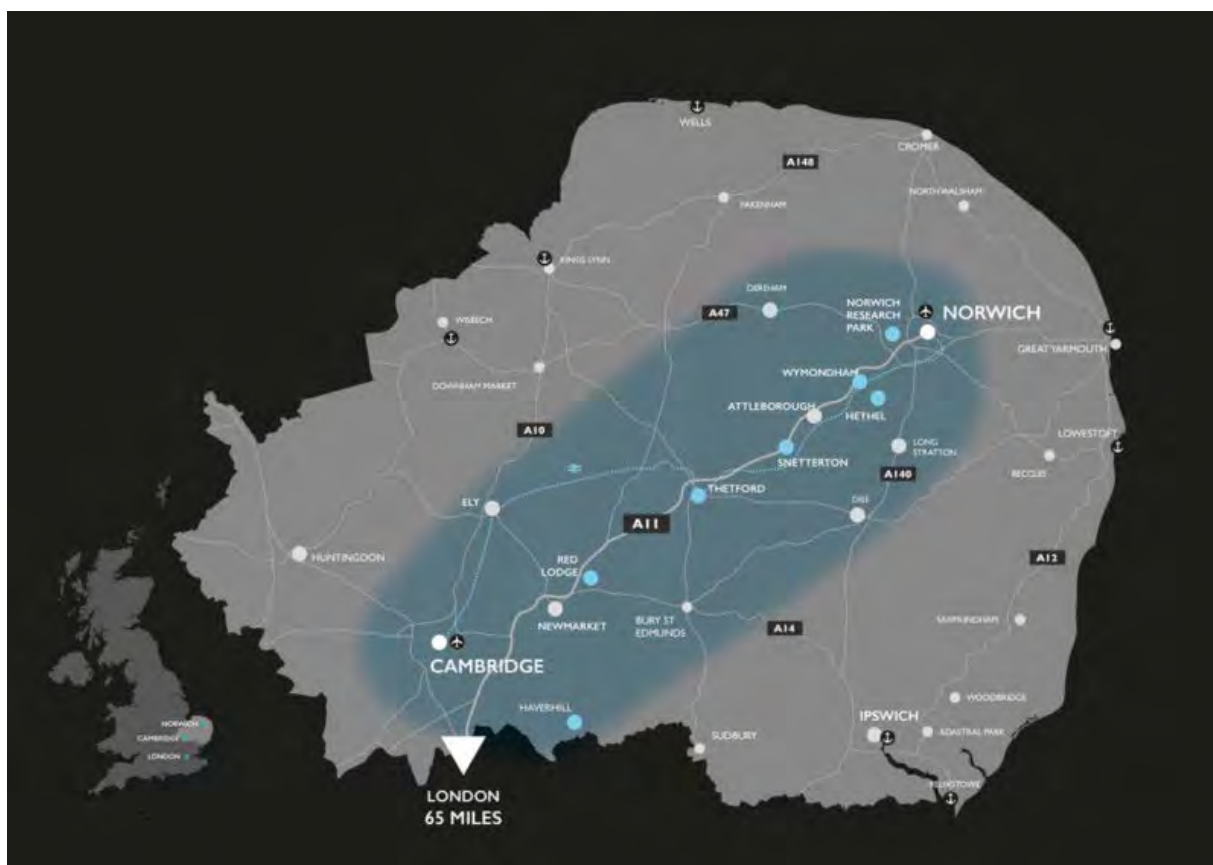
Source: Oxford Economics, ONS - Census 2011 (Workplace Data)

- 4.11 The dominance of Norwich is clear, though there are also a number of smaller settlements such as Wymondham and Diss which also benefit from a strong employment base whilst remaining separated from the Norwich urban area.

### iii) Further Growth Influences

- 4.12 The employment forecast from Oxford Economics analysed above is derived from a nationally-consistent forecast model, which is based primarily on national/regional outlooks for individual industry sectors and historic data at the local level. As such, the forecast does not take full account of policy interventions designed to promote above-trend growth. The GNLP acknowledges a number of external influences that have the potential to deliver additional growth, including the Cambridge Norwich Tech Corridor (CNTC) and the Greater Norwich City Deal.
- 4.13 Figure 4.5 below shows the area covered by the CNTC – a major initiative designed to promote the area as an attractive location for hi-tech firms in sectors such as digital, advanced engineering, biotech, life and environmental sciences and financial services.

Figure 4.5: Extent of the Cambridge Norwich Tech Corridor



Source: Cambridge Norwich Tech Corridor Partnership

- 4.14 In order to achieve this, the initiative aims to facilitate investment in strategic infrastructure (including an upgrade to the Ely North railway junction, which could result in a more frequent rail service along the corridor) and the delivery of 20,000 new homes.
- 4.15 A report in 2015 by Bruton Knowles and AMION Consulting identified that the corridor could create up to 8,700 net additional jobs in high value sectors (in alignment with the New Anglia LEP's economic development objectives), alongside an estimated 5,320 person years of temporary construction employment. This would deliver £558 million net additional Gross Value Added per annum and attract £905 million private sector investment in construction.
- 4.16 More recently, the CNTC initiative has predicted that its plans could create nearly 24,000 jobs<sup>5</sup> in digital/tech sectors along the route, taking full advantage of its links to one of the World's top universities (Cambridge) and the very high qualification levels of residents (52% being university graduates). Within the GNLPA area, the Tech Corridor initiative highlights Norwich Research Park, Browick Road (Wymondham) and Hethel Technology Park as key locations for potential development.

<sup>5</sup> <http://www.techcorridor.co.uk/about/>

4.17 In addition to the Tech Corridor, the GNL area also benefits from the Greater Norwich City deal, which supports the delivery of an estimated 19,000 jobs, including 3,000 high value jobs at the Norwich Research Park<sup>6</sup>.

**iv) Economic Outlook – Summary**

4.18 The economic outlook for the GNL area is positive, with a large number of jobs expected to be created over the plan period, including many high value jobs created through initiatives such as the CNTC and the Greater Norwich City Deal. The scale and ambition of the CNTC in particular has the potential to be transformative for the GNL area, providing Norwich with a clear link to the tech-driven economy of Cambridge.

4.19 Analysis of the spatial distribution of jobs within the GNL area demonstrates that the vast majority of current and future jobs are within the NPA. This highlights the importance of delivering housing growth as close as possible to key locations of economic growth.

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<sup>6</sup> <https://www.gov.uk/government/publications/city-deal-greater-norwich>

## 5.0 CONCLUSION

- 5.1 This Technical Report has reviewed the economic geography of Greater Norwich in the context of the emerging high level spatial planning policies of the Greater Norwich Local Plan. Specifically, the report has considered the continued relevance of the Norwich Policy Area (NPA) and the most appropriate option for allocating additional growth within the GNLP area.
- 5.2 The approach of national policy and guidance (in its current form) clearly promotes cross-boundary working and collaboration between local authorities that fall within objectively defined housing and economic market areas. There is also a clear preference for spatial planning options which promote sustainable travel – including travel to work. Though significant changes to national planning policy and guidance are currently being consulted on, it is not expected that the ambition for cross-boundary working and sustainable travel will be diluted.
- 5.3 The emerging GNLP is a collaboration between three local authorities that are demonstrably linked by economic geography. This is underpinned by detailed analysis contained within the 2015 Central Norfolk SHMA (and reiterated within the 2017 SHMA). Despite the strong evidence to support the existence of a core HMA (which is broadly similar in extent to the NPA) presented within the SHMA, the emerging GNLP is considering removing this level of HMA. The analysis contained within this Technical Report has provided further independent confirmation of the continued relevance of a defined area of focus comprising Norwich and the key settlements that support its economy.
- 5.4 A further report by GVA/Hatch, prepared on behalf of Norwich City Council (see Appendix 1), reaches a similar conclusion on the NPA:

**“NPA is useful reference geography because, it closely aligns with the functional economic areas and the majority of assets that are of strategic importance are located within this area.”** (GVA/Hatch, Norwich Economic Analysis Part 1, p.44)

- 5.5 The spatial options for accommodating additional growth have also been found to have varying levels of merit in the context of the national priority of supporting sustainable economic growth. Of the six broad spatial options put forward within the emerging GNLP, three rely on varying degrees of ‘dispersal’ to small settlements, including those outside of the NPA/Core HMA. The analysis contained within this Technical Report highlights that the vast majority of job creation over the plan period is expected to take place within the Norwich urban area, around the immediate urban fringes and along the A11 corridor. Initiatives such as the Cambridge Norwich

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Tech Corridor will only serve to enhance the potential of this area, providing a clear link into the tech-driven economy of Cambridge.

- 5.6 In summary, this Technical Report has found that in order for the GNLP to respond positively to the sustainable development goals of the NPPF, the most appropriate spatial strategy to follow is one that delivers the right number of homes in sustainable locations close to where jobs are expected to be created.
- 5.7 It is also important that the strategy takes full account of economic development initiatives such as the CNTC and City Deal, which have the potential to deliver transformative change to the local economy – both in terms of the overall number and the quality of jobs.
- 5.8 Finally, it is crucial that development is focused on areas that are well connected to existing transport networks – particularly public transport networks – to ensure that future infrastructure investment is used efficiently.
- 5.9 On this basis, it is considered that Option 2: Transport Corridors and Option 3: Supporting the Cambridge to Norwich Tech Corridor are the most appropriate options for allocating additional growth. It is also considered that the NPA (or similar distinction) will continue to be of use to ensure that development is directed to the most appropriate locations in line with the analysis set out in this Technical Report.



## **APPENDIX 1**

**GVA/HACTH, NORWICH ECONOMIC ANALYSIS PART 1, COMMISSIONED BY NORWICH  
CITY COUNCIL**

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# Norwich Economic Analysis

## Part 1: Norwich Economic Geography

*Research commissioned by Norwich city  
council into the functional economic  
geography of Norwich and its growth  
potential*

June 2017

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Prepared By: Martyn Saunders, Richa Joshi and Zak Vallender

Status: Version 1

Draft Date: June 2017

**For and on behalf of GVA Grimley Limited**

# 1. Introduction

- 1.1 This document has been prepared by GVA and Hatch on behalf of the Norwich City Council to provide a detailed economic assessment which demonstrates that Norwich and its wider urban area provides a core driver for accelerating the delivery of jobs and housing growth for the East of England. This supports the recent identification by Centre for Cities of Norwich as one of the “Fast Growth Cities” group.
- 1.2 To undertake this assessment the report has been divided into three parts:
- 1.3 **Part 1: Norwich Economic Geography:** This report is part 1 of this series, providing an overview of the multiple economic geographies of Norwich which include the local authority area, the urban area, the Norwich Policy Area (NPA), the Greater Norwich Area, Travel to Work Areas (TTWAs) and commuting patterns, and the Broad Rental Market Area (BRMA) and Housing Market Area (HMA). This review informs the use of the NPA as a study area or ‘reference geography’ that is used as the basis for analysis of the local economy in following sections and parts 2 and 3 of this series. This part of the series also assesses the commercial and housing property market, the role of infrastructure and growth locations as growth drivers, and how these come together as a cluster to form the engine of growth and development around the Norwich core.
- 1.4 **Part 2: The Norwich Policy Area: a dynamic, resilient growth oriented economy:** The second part of this series provides a review of the competitiveness of the Norwich economy within the UK and a detailed socio-economic overview of the NPA and its contributions to the regional and national economy. This part refers to current and historic data in addition to forecasts for the future to provide a comprehensive analysis of the strengths and weaknesses of the NPA economy. This analysis is based upon eight success factors that are attributed to resilient, adaptable and fast growing cities;
- Scale and Quality of Assets
  - Population, Workforce and Skills Base
  - Dynamic Enterprise Culture
  - Strong Representation in High Value Growth Sectors
  - Growing Capabilities in Key Technologies for the Future
  - An Attractive and Vibrant Urban Core
  - Opportunity Areas, Well Connected Sites and Premises
  - Leadership

1.5 **Part 3: Future Growth Sectors:** The third part identifies priority sectors within the NPA, based upon detailed quantitative analysis and stakeholder input, which are expected to deliver employment and productivity growth over the next 25 years. Each section within part 3 pertains to a particular priority sector and includes three sub-sections;

- *Sectoral Composition:* A review of employment within sub-sectors that make up the current priority sector and the role of key businesses and organisations;
- *Sectoral Change:* An analysis of the change of employment within a priority sector over the 2010 – 2015 period with comparison to other city economies;
- *Prospects for Growth:* A bespoke forecast, utilising projections developed by HATCH based on the Cambridge Econometrics EEFM, of prospective employment growth within sub-sectors that will drive future growth in the NPA.

1.6 The priority sectors that have been identified within the NPA include:

- Financial Services
- Life Sciences
- Advanced Manufacturing
- Food and Drink
- Digital Technology
- Creative Industries
- Knowledge Intensive Business Services (KIBS)

## 2. Geographies and Context

- 2.1 Norwich is a regional economic hub with a large catchment for homes, jobs and businesses. The city is home to more than 123,000 jobs and more than 8,000 businesses. Further, almost 50% of jobs are based in large companies and the city is one of the largest sources of employment in Greater South –East England (Norwich Economic Strategy, 2016). It is one of the key economic core cities in the east with connections to other regional economies such as Cambridge and London, and with international connectivity via ports and the Norwich Airport (Figure 1).
- 2.2 Norwich has a series of geographies that relate to its physical and economic footprint that do not neatly conform to its local authority area. Catchments for housing and labour often extend outside of cities and the Norwich local economic geography has long been recognised to expand beyond its institutional boundary. Further, these geographies change overtime as the local economy adapts, matures, and grows.
- 2.3 This section therefore sets out to review these geographies and draw out how each of these geographies shape and respond to the Norwich economy. This review will then be referenced to provide a study area that will form the basis of the subsequent analysis. This study area or ‘reference geography’ is not necessarily intended to represent a singular spatial definition of the Norwich economy but will provide a sufficient level of detail to capture its spatial and economic dynamics.
- 2.4 The geographic areas that are reviewed below include:
- Norwich Local Authority Area, the “City Centre” (i.e. the core of the city which accommodates the critical mass of commercial activity) and the Norwich “Urban Area” (i.e. broadly the contiguous built up area within the local authority areas of Norwich, Broadland and South Norfolk) – shown in Figure 2 below;
  - Norwich Policy Area;
  - Greater Norwich;
  - Norwich Travel to Work Area (TTWA);
  - Norwich Broad Rental Market Area (BRMA) and Housing Market Area (HMA).

Figure 1: Norwich Location and Strategic Connections



Key

-  Main Roads
-  Motorways
-  Rail Links

This plan is based on Ordnance Survey Map Data with the permission of The Controller of her Majesty's Stationery Office © Crown Copyright. Any unauthorised reproduction may lead to prosecution.  
 Broadland District Council – 100022319  
 Norwich City Council – 100019747  
 South Norfolk District Council – 100019483

September 2009

Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

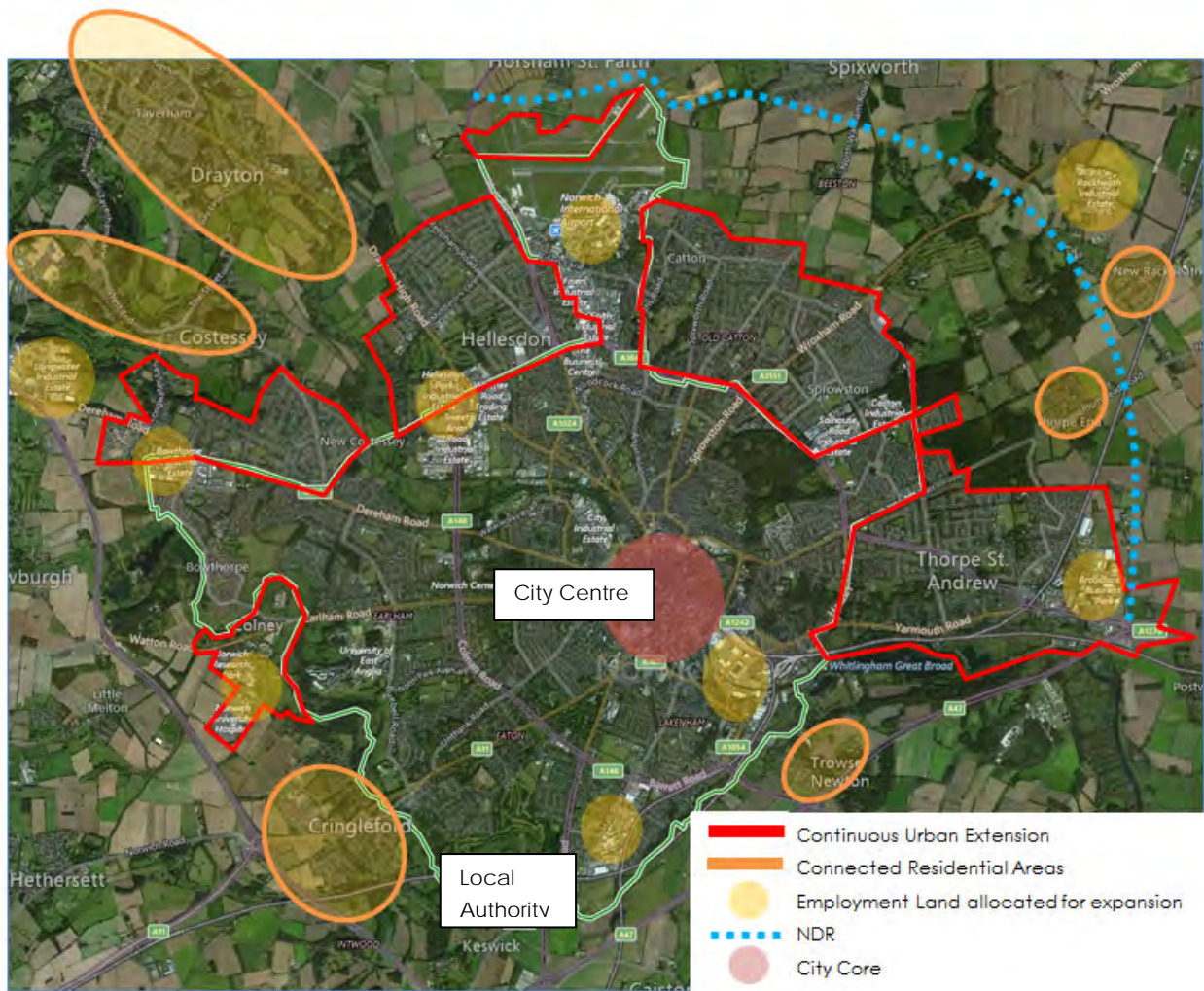
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## Norwich City centre, Local Authority Boundary and Beyond

- 2.5 Norwich's city core, local authority area and periphery are shown in Figure 2. The City centre shown with a red circle includes the historic area, city centre and the core central area of Norwich. The Norwich local authority boundary is shown in green and the continuous urban footprint includes the periphery of the green bounded local authority area plus the areas outlined in red.
- 2.6 Clearly, a significant proportion of the "urban area" that is considered Norwich in fact falls outside of the City local authority area boundary. Much of the "urban area" that falls outside of the local authority area (those areas labelled as Continuous Urban Extensions on Figure 2) contains some of the largest commercial and residential locations and development opportunities. These include sites such as the Norwich Research Park, Rackheath, and Broadland Business Park. The Norwich City local authority area boundary also poorly captures some of the key infrastructure that serves and is planned to serve Norwich, such as the A47 and the Northern Distributor Route (NDR).
- 2.7 Given that many of these peripheral commercial locations provide high skilled jobs, much of Norwich's economic strengths are poorly captured by analysis conducted at the local authority level. Further, examples such as the recent move of some of Aviva's activity from the city centre to Broadland Business Park suggest that the city centre competes with the wider "urban area" and locations beyond it to attract businesses and to provide commercial floorspace.
- 2.8 These findings infer that the local authority area is not an accurate geography in seeking to understand or capture the true economic value or potential created by Norwich or the spatial and economic dynamics that play out in the area. It is also unlikely that the "urban area" (is sufficient to capture how businesses, jobs and housing locations are in direct competition around Norwich given that there are proximate commercial and industrial locations that do not form part of the Norwich's built-up/ continuous "urban area". It is instead likely that the economic influence of Norwich extends beyond this urban area.



Figure 2: Norwich (City Centre, Local Authority and Built Up Area)



Source: Bing, 2017.

## Norwich Policy Area

2.9 The **Norwich Policy Area (NPA)** is a long standing spatial definition, devised in the mid-1970s and including the Norwich local authority and parts of Broadland and South Norfolk, which was designed to facilitate the management of growth driven by the city. Shown in Figure 3, the key objective for the NPA is to achieve a better local balance between homes and jobs so as to reduce the need to travel and to keep Norwich-related growth as close to the city as possible.

2.10 Figure 3 illustrates that the NPA is based on parish boundaries and includes settlements such as Wymondham and Long Stratton. These settlements are not considered part of Norwich city but have been recognised for their strong economic ties. Villages and other rural locations are unlikely to make large economic contributions to area but their proximity to Norwich, and distance away from any other large urban centre, suggests a dependence on and connectedness to Norwich in the form of access to services and employment.

2.11 The figure shows that the NPA captures the parishes within which the Norwich urban area falls and would better accommodate analysis of some of the spatial and economic dynamics that prove more challenging at the smaller local authority and urban area geographies.

Figure 3: Norwich Policy Area

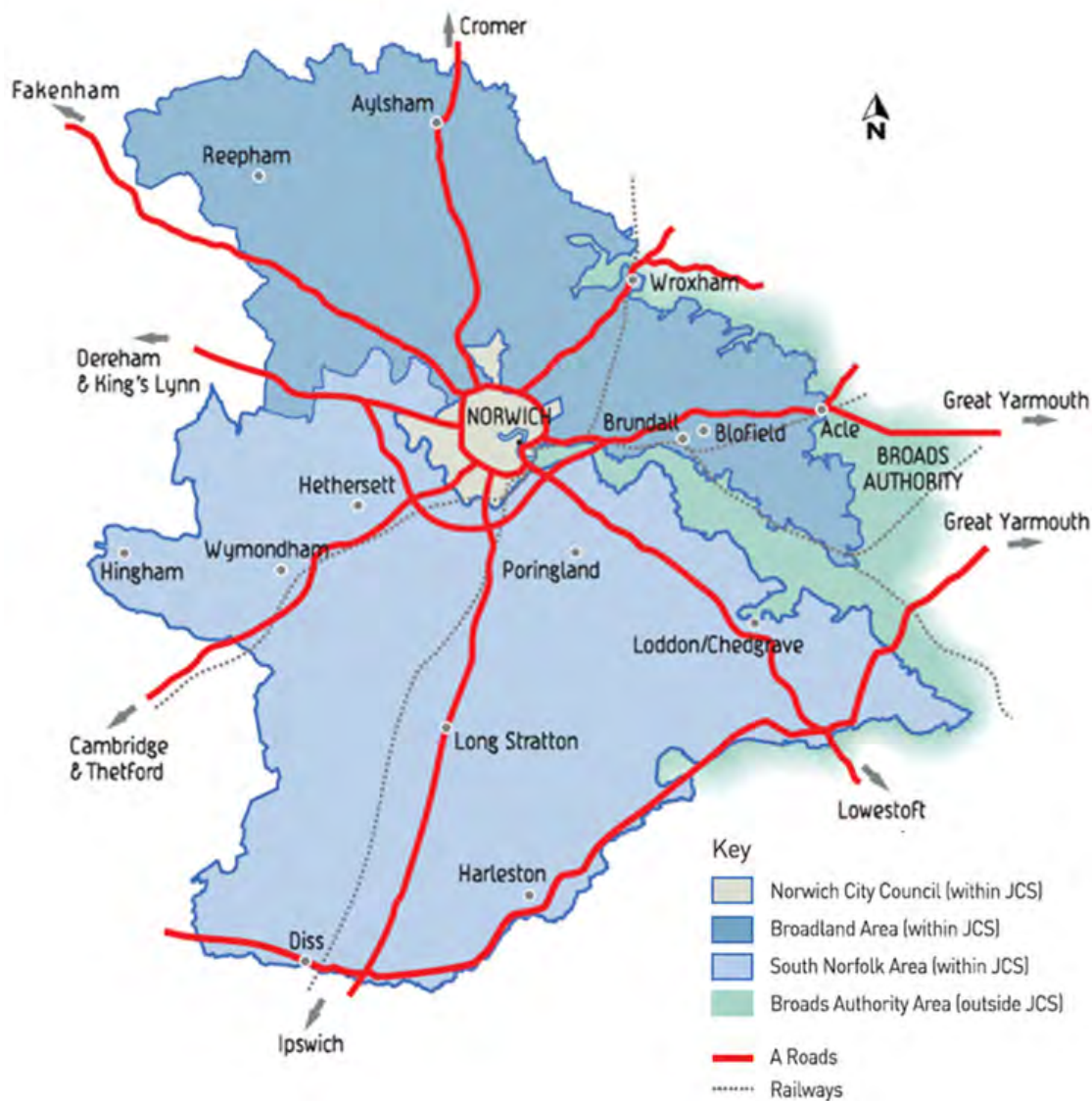


Source: Norwich City

## Greater Norwich

- 2.12 **Greater Norwich**, shown in Figure 4 below, is a construct of the now defunct Regional Spatial Strategy for the East of England which identified the area as an engine of growth. The 2015 Norwich Economic Assessment notes that the three local authorities are now referred to collectively as the Norwich City Deal area and the Greater Norwich Growth Board area. The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk is the key planning policy document for the Greater Norwich area and forms part of the Local Plans for the districts of Broadland, Norwich and South Norfolk.
- 2.13 Considering Norwich, Broadland and South Norfolk together has proven useful from a policy perspective in directing existing institutions to deliver coherent plans, such as the JCS, for Norwich and its hinterland. The three/four authorities have cooperated to facilitate growth which has enabled opportunities such as the Broadland Business Park, Norwich Research Park, and NDR to come forward.
- 2.14 However, the Greater Norwich area is large and alludes to a centralised perspective with a dependence on Norwich which may not necessarily be the case for peripheral towns and villages. The scale of the Greater Norwich area also dilutes analysis of the distinct band of valuable employment areas that form a ring around Norwich. As pinpointed above, there is a need to more clearly capture the influence of these peripheral sites, particular as they continue to compete with the Norwich city centre. As such, the Greater Norwich area is considered too large a reference geography and the NPA is instead preferred.

Figure 4: Joint Core Strategy Area



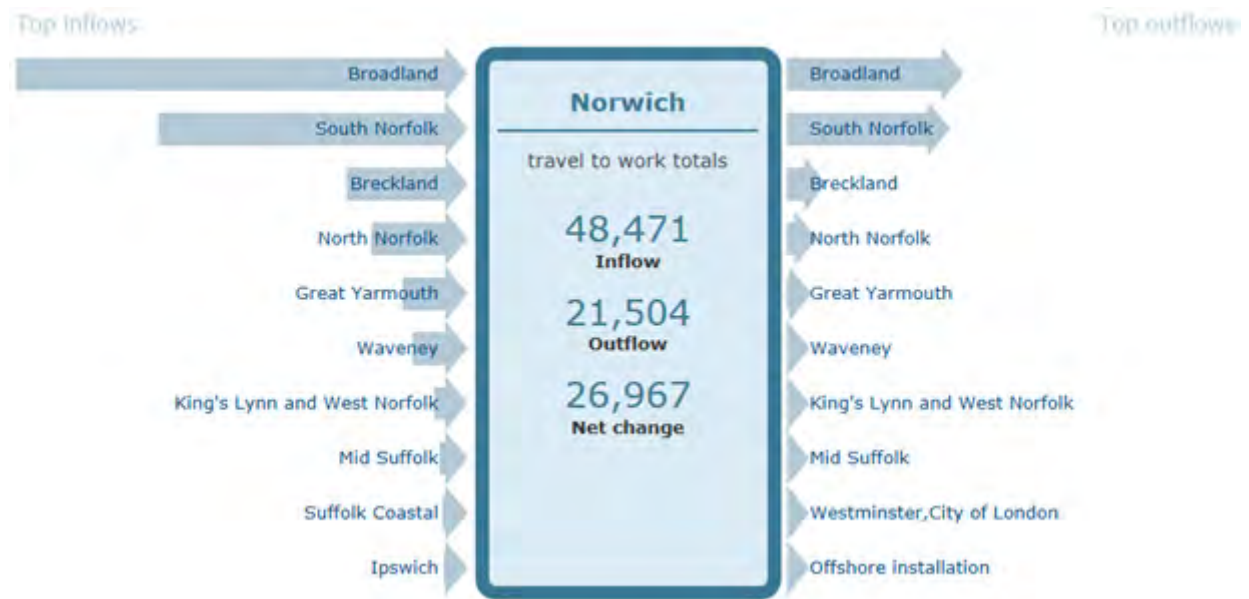
Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

## Norwich Travel to Work Areas

2.15 **Travel to Work Areas (TTWAs)** are a statistical tool designed by the Office of National Statistics that provide a useful indication of the connectedness of locations based on labour movements. Figure 5 draws upon 2011 Census data and shows that the majority of those who travel in and out of Norwich for work live within Greater Norwich. Given that parts of the Norwich urban area fall within its neighbouring local authority boundaries, some of this cross boundary movement is in fact likely to be movement within the Norwich urban area.

2.16 Figure 5 shows that 125% (26,967) more individuals travel into Norwich for work than those who travel out. 41% (19,976) of people who travel into Norwich for work are from Broadland and 26% (13,361) from South Norfolk. Of the 21,504 people that commute out of Norwich for work, 36% (7,681) travel to Broadland and 33% (7,025) to South Norfolk.

Figure 5: Norwich Travel to Work Flows

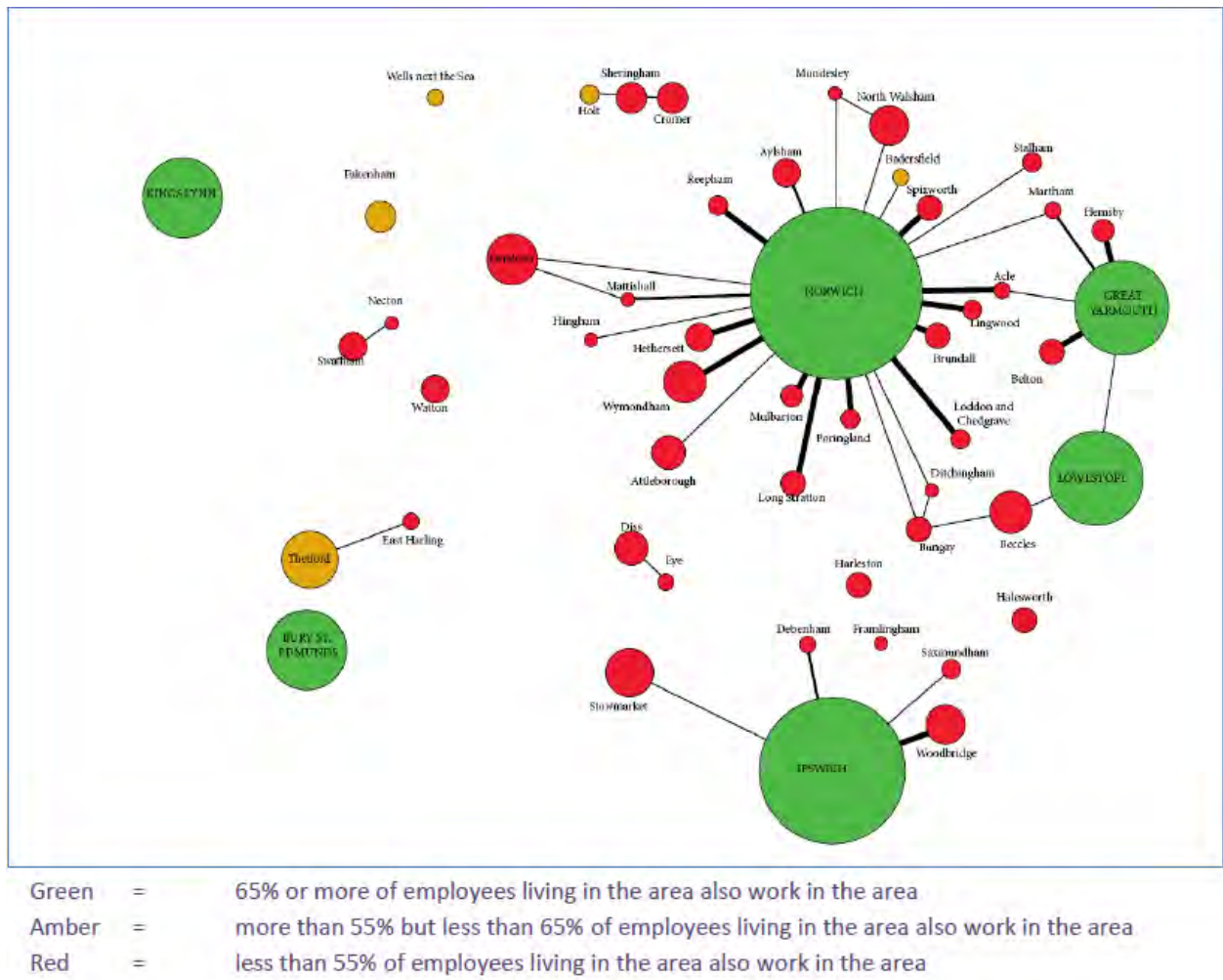


Source: Census, 2011

- 2.17 Figure 6 shows functional relationships based on 2001 origin-destination data (2011 data is currently safeguarded for small areas). Drawn from the 2016 Central Norfolk SHMA, the size of the urban centres (the coloured circle) is proportional to the number of workers who live within the area. The more workers, the larger the circle; hence Norwich is the largest circle.
- 2.18 The links that exist between the urban centres are also illustrated by the joining lines, with stronger links having heavier lines. The thickness of the line does not simply represent the number of workers, but it is based on a 'score' that is based on the strength of the connection when taking into account the number and the proportion of the resident and workplace populations in both areas.
- 2.19 The figure shows that Norwich has strong labour connections with 11 proximate settlements<sup>1</sup> and functions as part of a wide and partially interconnected network. Norwich is the prime employer in the Central Norfolk study area and provides jobs for an extensive catchment that includes settlements across Greater Norwich and outside it.

<sup>1</sup> Wymondham, Hethersett, Mulbarton, Long Stratton, Poringland, Loddon and Chedgrave, Brundell, Lingwood, Acle, Spixworth, and Reepham.

Figure 6: 2001 small area functional relationships



Source: Central Norfolk Strategic Housing Market Assessment, 2016

2.20 As shown in Figure 7, the Norwich TTWA includes the Norwich Local Authority and all of Broadland and South Norfolk local authorities plus parts of the local authority areas of North Norfolk, Breckland and Mid-Suffolk. The Norwich TTWA is much larger than the Norwich Policy Area (NPA) and reflects the increased range of commuting brought about by greater car ownership and higher employment mobility which has widened the functional economic area and the real functional reach of the city.

Figure 7: Norwich Travel to Work Area



Source: *Norwich Local Economic Assessment, 2015*

- 2.21 The 2015 Norwich Local Economic Assessment notes that the Norwich TTWA has 234,986 economically active residents and 220,540 residents in work, 191,408 of Norwich residents work in the 221,571 jobs that exist in the TTWA. Around 87 per cent of employed residents work within the TTWA and 86 per cent of jobs in the TTWA are held by TTWA residents.
- 2.22 Norwich's economic footprint, that is the degree to which firms and households are integrated into the local, regional and national economy in terms of their purchases and sales, is difficult to determine and even more difficult to quantify. Without doubt the urban area of Norwich acts as a regional service centre and a locus for services such as health, retail and leisure. It is a major employment centre, providing almost two-thirds of the TTWA's jobs. Much of the Norwich TTWA is rural with very low population densities; so although parts of the North Norfolk and Mid Suffolk local authority areas fall within the Norwich TTWA the actual numbers of people involved are very small.

## Norwich Broad Rental Market Area and Housing Market Area

- 2.23 **The Broad Rental Market Area (BRMA)** is the geographical area used by the Valuation Office Agency (VOA) to determine the Local Housing Allowance rate (LHA), the allowance paid to Housing Benefit applicants living in the private rented sector. The BRMA area is based on an area where a person could reasonably be expected to live taking into account access to facilities and services for the purposes of health, education, recreation, personal banking and shopping. When determining BRMAs the Rent Officer takes account of the distance of travel, by public and private transport, to and from these facilities and services.
- 2.24 Figure 8 shows the BRMA area for Central Norfolk and Norwich which has a reasonable degree of fit with the Norwich TTWA. Aligned with the analysis of the TTWA, the BRMA indicates Norwich has an influence on residential location decisions that extends beyond the Greater Norwich area.

Figure 8: Central Norfolk and Norwich Broad Rental Market Area



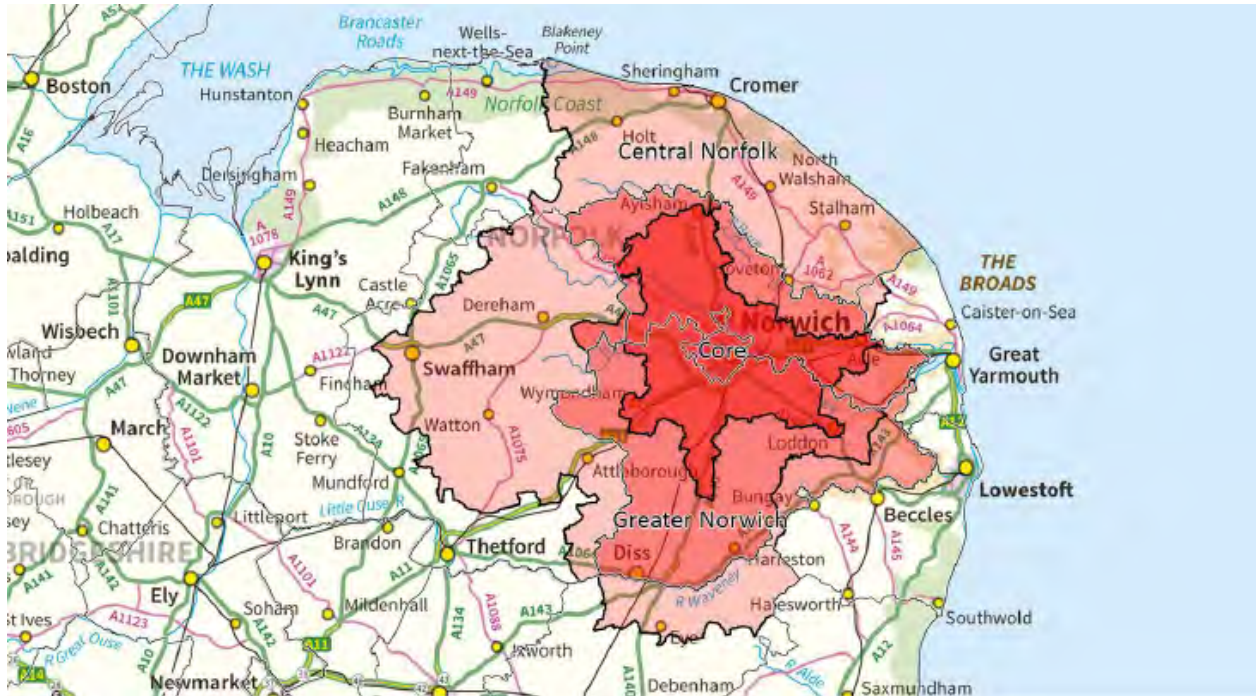
Source: Norwich Local Economic Assessment, 2015

- 2.25 Figure 9 shows the **Central Norfolk Housing Market Area (HMA)** identified by the 2015 Central Norfolk Strategic Housing Market Assessment. The wider catchment is reflective of the scale of the BRMA and TTWA, reinforcing the observation that Norwich has a large geographic influence and acts as a prominent economic centre in East Anglia.
- 2.26 The Core area shows the settlements with the strongest connections to the Norwich Urban Area which is similar to the Norwich Policy Area. This suggests that a large proportion of housing should be delivered in these locations that are peripheral to the Norwich local authority area. This is



illustrative of the cohesion within the NPA, noting that the HMA core does not simply align to the local authority boundary or continuous urban area.

Figure 9: Housing Market Area in and around Greater Norwich (Source: UK Census of Population 2001 combined with DEFRA Classifications)



Source: Central Norfolk Strategic Housing Market Assessment, 2016

## Section Summary/Findings

- 2.27 **Close alignment of Norwich Policy Area with Norwich Urban Geography:** Each of these geographies illustrates the extent of influence that Norwich has over its sub-regional hinterland and the complexity of its catchments for jobs, labour and homes. The figures above show that Norwich's catchment for those working in the city and depending on its services is larger than the Norwich City Authority area.
- 2.28 The study continues below by reviewing the infrastructure and site assets, referred to as 'growth drivers' that form the nodes and spokes around which much of the development and growth driven by Norwich is located. Acknowledging that the local authority area poorly captures extensive growth opportunities positioned on outside the city authority boundary but within the continuous urban area and that overly large Greater Norwich area renders analysis obtuse and unrefined, the Norwich Policy Area is considered the best reference geography for the following sections of this report.
- 2.29 The NPA is a useful reference geography because, as shown in this section, the majority of assets that are of strategic importance are located within this area. The NPA therefore closely aligns with the Norwich functional economic area. Further, as analysis of functional relationships with

neighbouring centres and HMA shows, Norwich is most strongly connected to settlements and development sites within this area. Unlike the local authority and Greater Norwich areas, the NPA is therefore shown to be of an agreeable size that enables detailed and commensurate analysis. Moreover, the NPA is an existing designation that is recognised and supported by each of the local authorities within Greater Norwich and its continued use enables reference to an established evidence base.

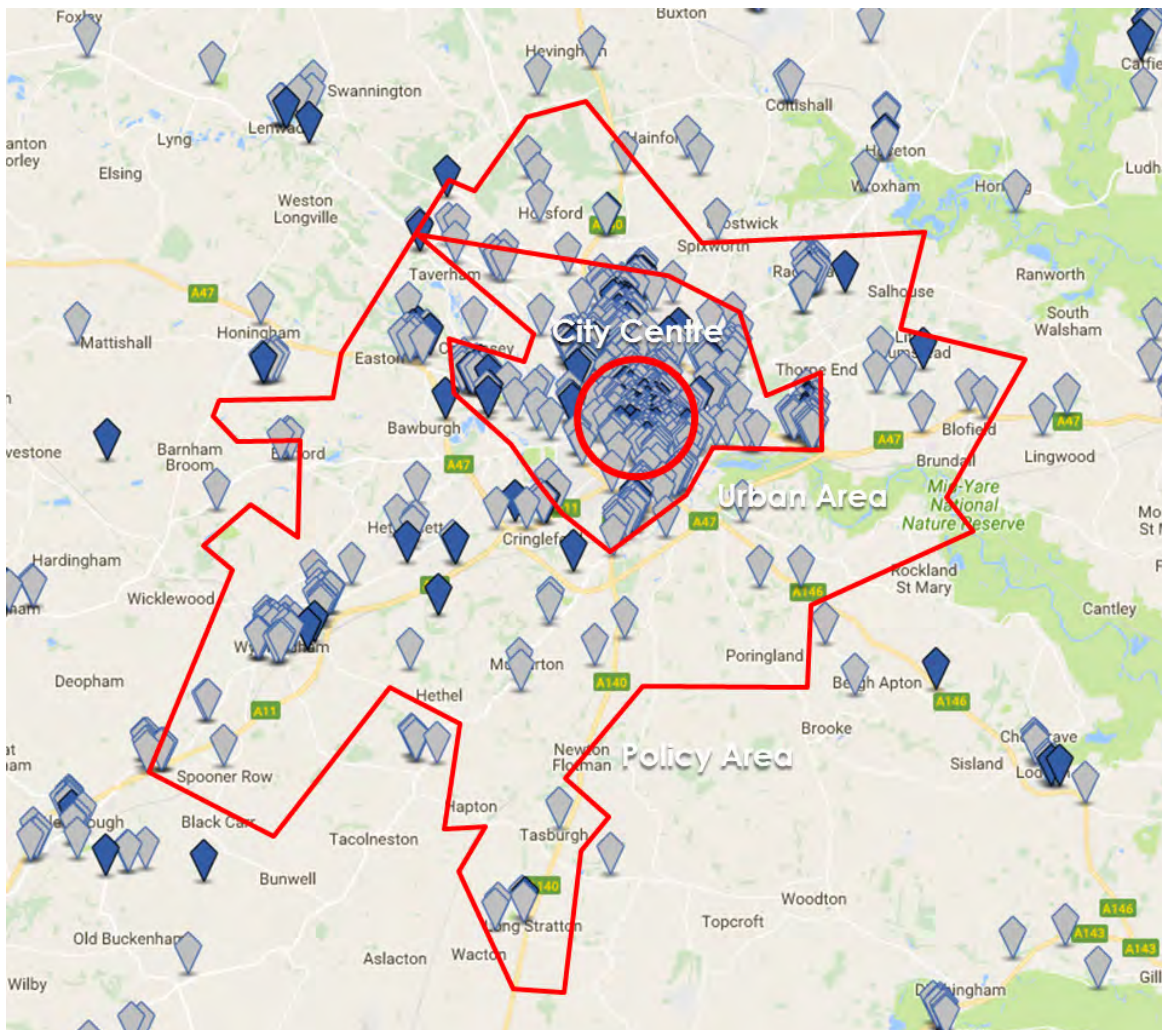
## 3. Market Review

### Commercial Market

3.1 This section provides a review of the property geographies within the NPA reference geography as designated within the previous section. To undertake the analysis we have compared NPA with the city centre and “urban area” as shown in Figure 10. It reviews total quantum, vacancy levels, rents, and net absorption as a measure of market activity. An extensive baseline analysis is available for the Norwich local authority area and neighbouring local authorities as part of the Greater Norwich Employment, Town Centres and Retail Study.

3.2 Figure 10 shows that the majority of commercial buildings are concentrated in the Norwich urban area with heightened concentration in the city centre. Outside of the urban area, commercial buildings are primarily located in key business and industrial sites which are reviewed in the following growth drivers section.

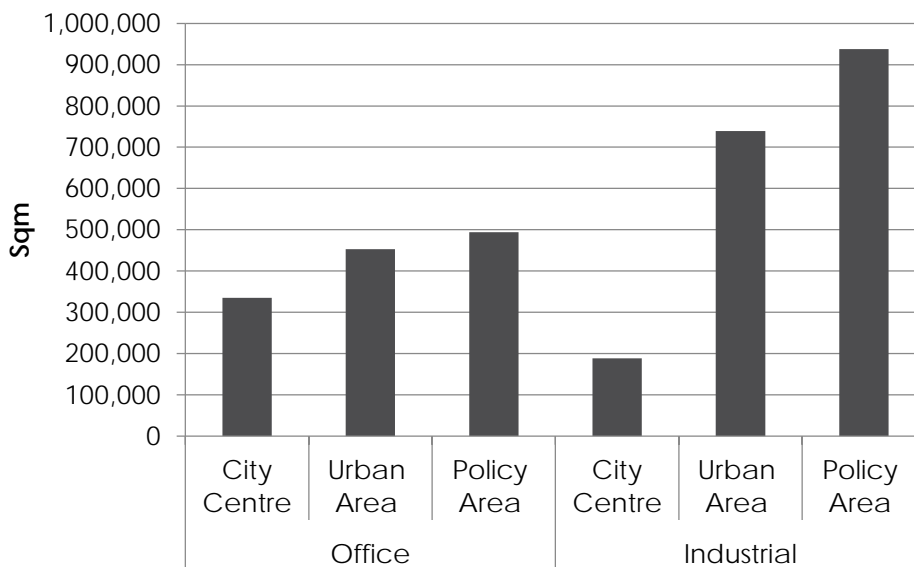
Figure 10: Commercial Properties within Norwich Policy Area



Source: Costar, 2017

3.3 **Quantum of commercial floorspace:** Figure 11 reviews office and industrial stock by floorspace across the three different geographies. It shows that the majority of the office space in the wider Norwich Policy Area (494,051 sqm) is located in the urban area of Norwich (453,284 sqm) and more specifically in the city centre (334,875 sqm). Industrial floorspace is more dispersed throughout the Norwich Policy Area (937,698 sqm), with a large proportion located in the urban area (738,823 sqm) but in more peripheral locations such as in industrial estates rather than in the city centre (188,766 sqm).

Figure 11: Existing Floorspace



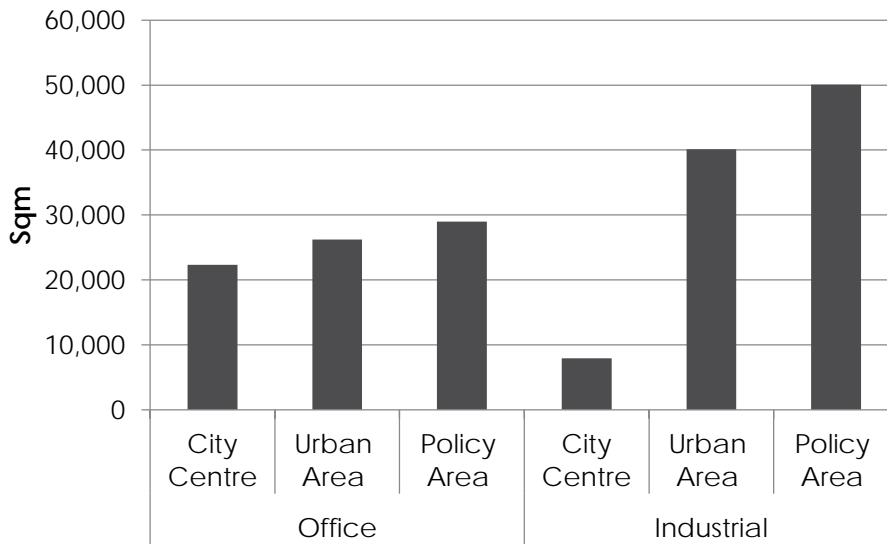
Source: Costar, 2017

3.4 **Vacancy Rates:** Vacant floorspace shown below in Figure 12 are reflective of the existing floorspace in their proportions. Office vacancy rates are slightly higher than industrial vacancy rates and whereas city centre industrial vacancy rates are relatively low, city centre office vacancy rates are relatively high. There are a number of factors that are driving this relationship. Firstly it there is a much lower supply of industrial floorspace meaning there is less choice for businesses seeking to service the city and therefore occupancy rates would be expected to be higher.

3.5 More importantly, like many locations that have had a historically large office based economy, the city centre has seen a large proportion of its stock rendered redundant as buildings have aged, refurbishments considered unviable and newer stock delivered outside of the city centre. Coupled with changes to occupier requirements and preferences for stock much of the older provision has now become redundant and therefore lies vacant. This provides a drag on the city centre market, with high vacancy rates (of units that are unlikely to be re-used) deflating rental values.

3.6 In limited cases, such as the Union Building on Rose Lane, this stock has been repurposed to provide a mix of commercial space, including some office/co-working alongside food and beverage and other services to create a different environment for businesses.

Figure 12: Vacant Floorspace



Source: Costar, 2017

3.7 **Rents:** As is typical, office rents per sqm are higher than industrial rents. Average office rents are higher in peripheral locations rather than in the city centre, this reflects the stock condition issues discussed above and the increased demand this has led to in out of centre locations, in a more 'healthy' market rents in the centre would typically be higher. Industrial rents are however higher in the city centre and this is reflective of most urban areas, given the lack of available industrial units in centres and sites to accommodate such uses.

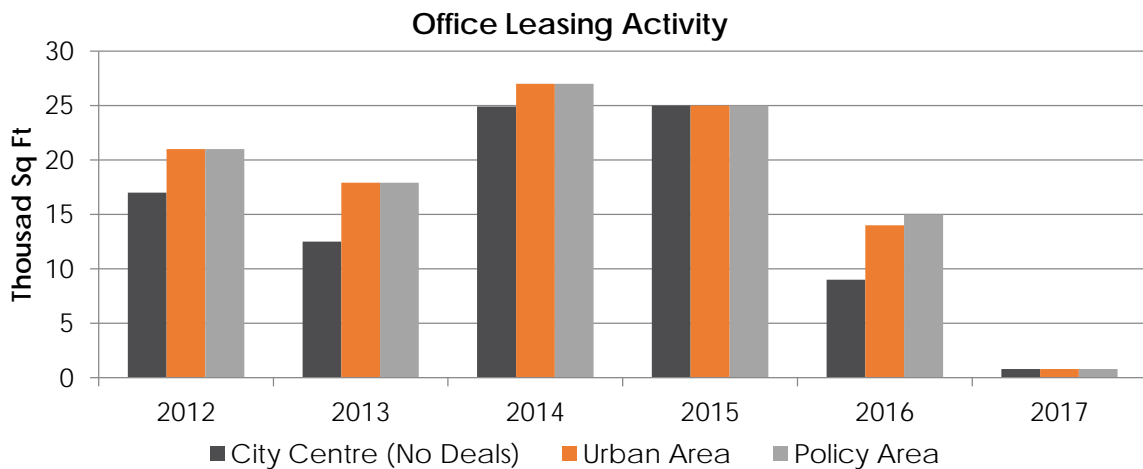
Figure 13: Rents per sqm



Source: Costar, 2017

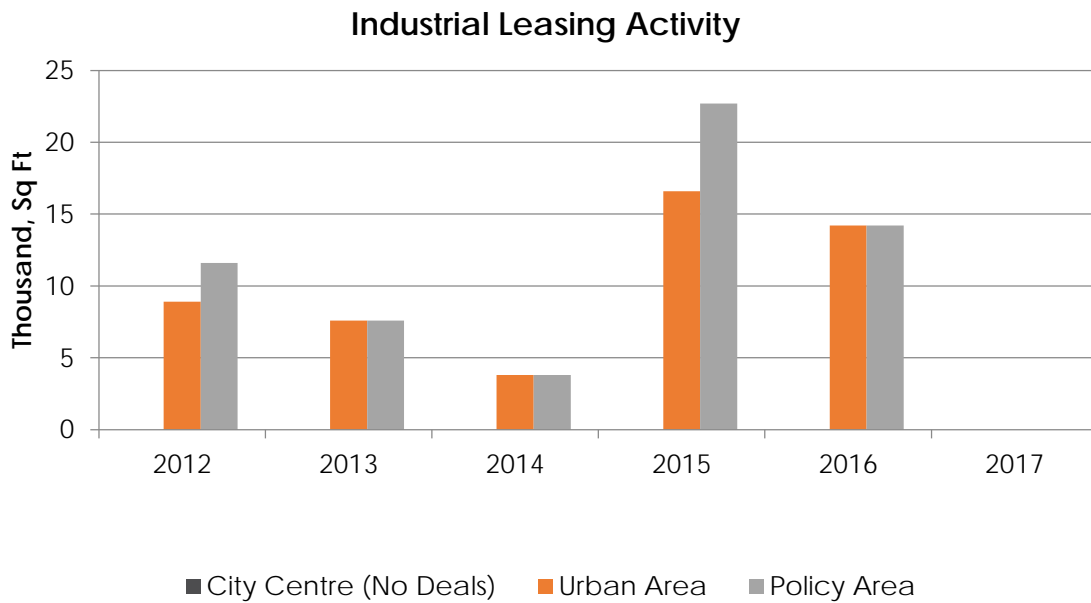
3.8 **Leasing Activity:** Figure 14 and Figure 15 shows leasing activity trends in Norwich for both office and industrial market. Leasing within the office market has fluctuated in recent years with a significant fall in 2016 across the three geographies. This fall may not necessarily be representation of a wider trend but illustrates that activity within the geographies is primarily driven by external factors rather than simply movements across NPA sites. Leasing activity for industrial floorspace seems to have improved in recent years and is reflective of the wider UK trend of increasing industrial floorspace take-up

Figure 14: Office Leasing Trends by Year



Source: Costar, 2017

Figure 15: Industrial leasing Activity by Year



Source: Costar, 2017

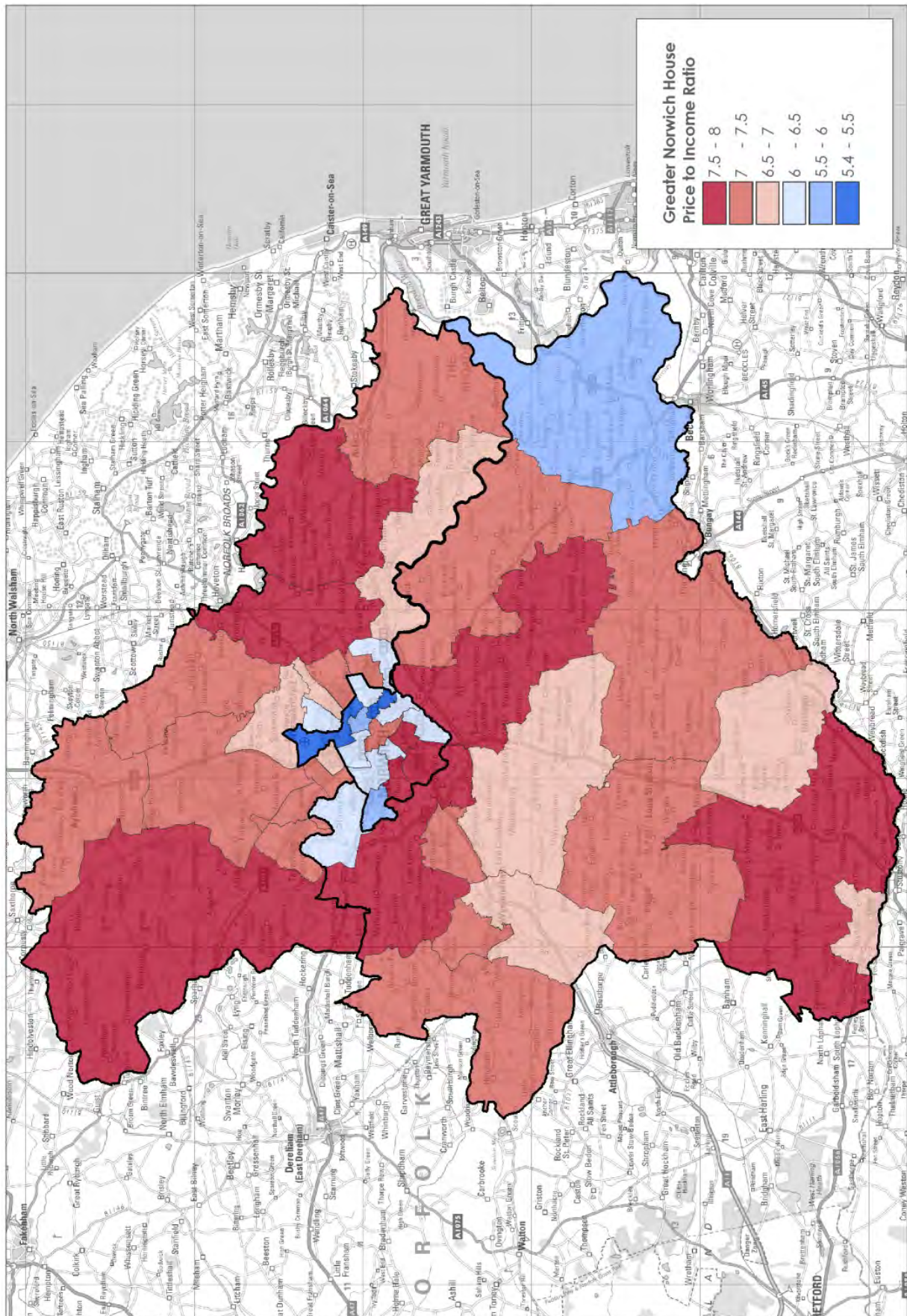
- 3.9 Overall the property analysis above suggests a lower demand for office space than industrial space across the NPA which is particularly acute in the city centre. Although a long term trend is difficult to pinpoint, there does appear to be some reduced activity in the office market. Examples such as the relocation of some of Aviva's activity from the core to the Broadland Business Park as well as potential negative impacts surrounding outcomes of the current political climate (such as Brexit) does suggest a need to capture changing needs of office and industrial typologies in line with location, occupier needs and sectoral focus.

## Housing Market

- 3.10 Alongside the geographies of commercial property floorspace and cost, house price affordability is also of interest because it reflects how well a local economy is doing, how desirable an area is, whether there may be affordability issues for attracting talent, and is comparable across the country. In Lloyds Bank's 2017 housing affordability report<sup>2</sup>, Norwich's housing market was ranked the 15<sup>th</sup> most expensive in the country. Norwich is therefore considered a desirable place to live and work, which is also reflected in its large HMA catchment as discussed above.
- 3.11 Figure 15 below shows housing affordability in postcode areas across Greater Norwich. It shows that the most affordable locations are primarily located in the Norwich urban area, the highest value postcodes in Norwich are those to the south west. These value dynamics are driven by a complex range of inter-related factors including stock typology and age, mix of housing tenures, amenities and transport provision, quality of environment etc.

<sup>2</sup> <http://www.lloydsbankinggroup.com/globalassets/documents/media/press-releases/lloyds-bank/2017/250217-affordable-cities.pdf>

Figure 16: Greater Norwich House Price to Income Ratio by Postcode Area



Map reproduced from GBPro 200 GB (2015 edition), MapData © Coles Bartholomew Ltd (2015), House Price to Income Ratio Data sourced from Office for National Statistics © Crown copyright 2016

Source: GVA, ONS, 2017



## 4. Growth Drivers

4.1 Growth drivers refer to the physical assets, principally infrastructure and growth locations, on and around which much of the development driven by the Norwich economy is likely to be positioned. This view recognises that local economic areas typically comprise a cluster of nodes (growth locations) and spokes (infrastructure) that are, in this case, centred around Norwich.

4.2 The value of these physical assets as growth drivers and how they come together to shape the Norwich economy is discussed below. Growth locations and key infrastructure are reviewed individually and then discussed together regarding their influence. Growth locations are discussed first as hubs of commercial and economic activity and key infrastructure is discussed second in how they facilitate connectivity between these nodes. Growth locations and key infrastructure reviewed below include:

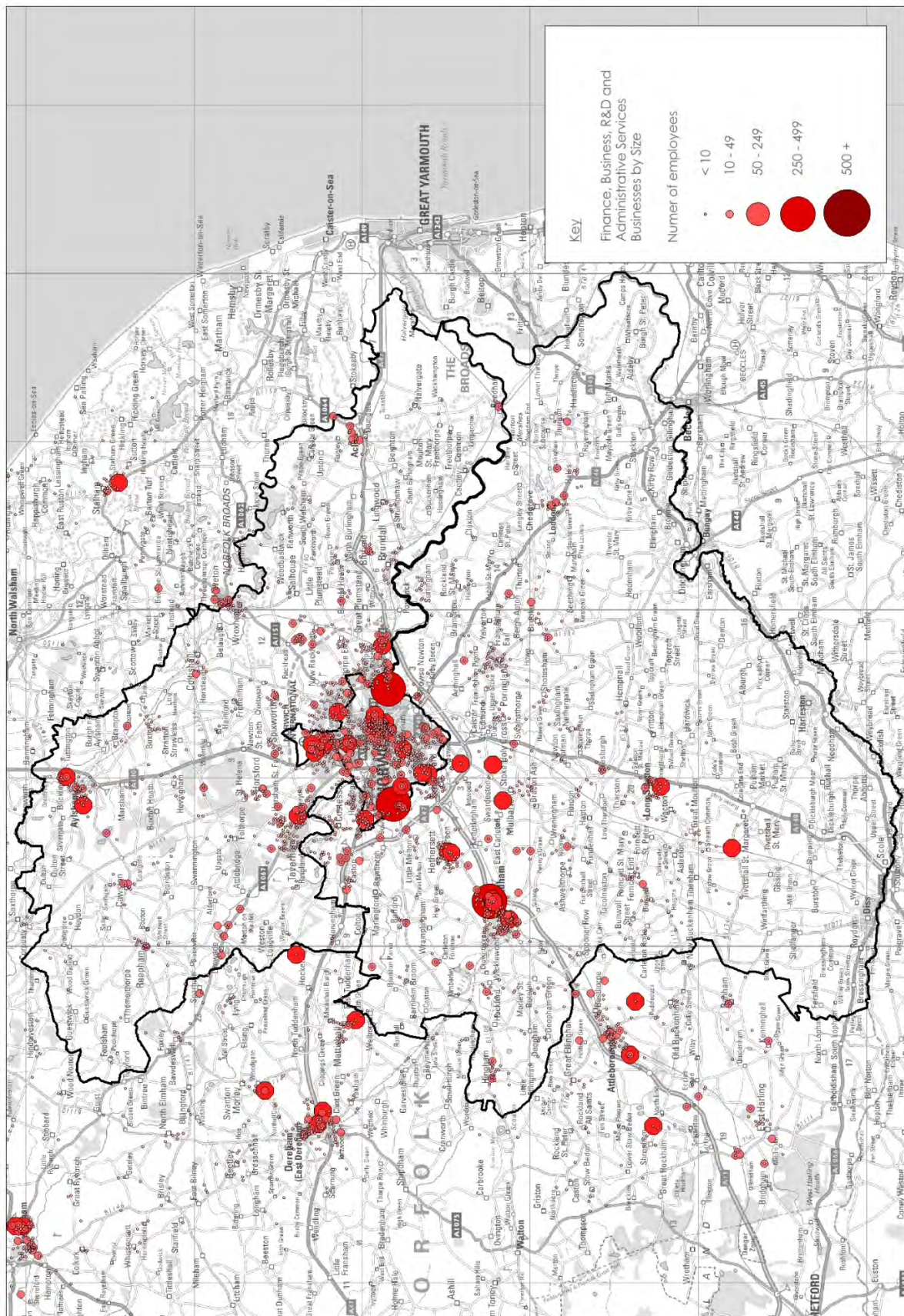
- Growth Locations
  - Norwich Research Park/ Cringleford
  - Broadland Business Park
  - Old Catton Sprowston, Rackheath, St Andrew Growth Triangle
  - Longwater/ Easton/ Cotessey
  - Wymondham and Hethel
  - Hethersett
  - Long Stratton
  - Norwich Airport
  - Norwich Urban Area
- Key Infrastructure
  - Northern Distributor Road
  - A11 Corridor (Tech corridor)
  - Long Stratton Bypass
  - Sustainable Transport Corridors/Green Infrastructure
  - Norwich International Airport
  - Rail Improvements

4.3 In addition to the above two sub-sections, the Norwich city centre is discussed separately and in more detail because of its role as the primary hub in the economy and because of the unique circumstance of loss of occupiers to other hubs in the NPA.

## Growth Locations

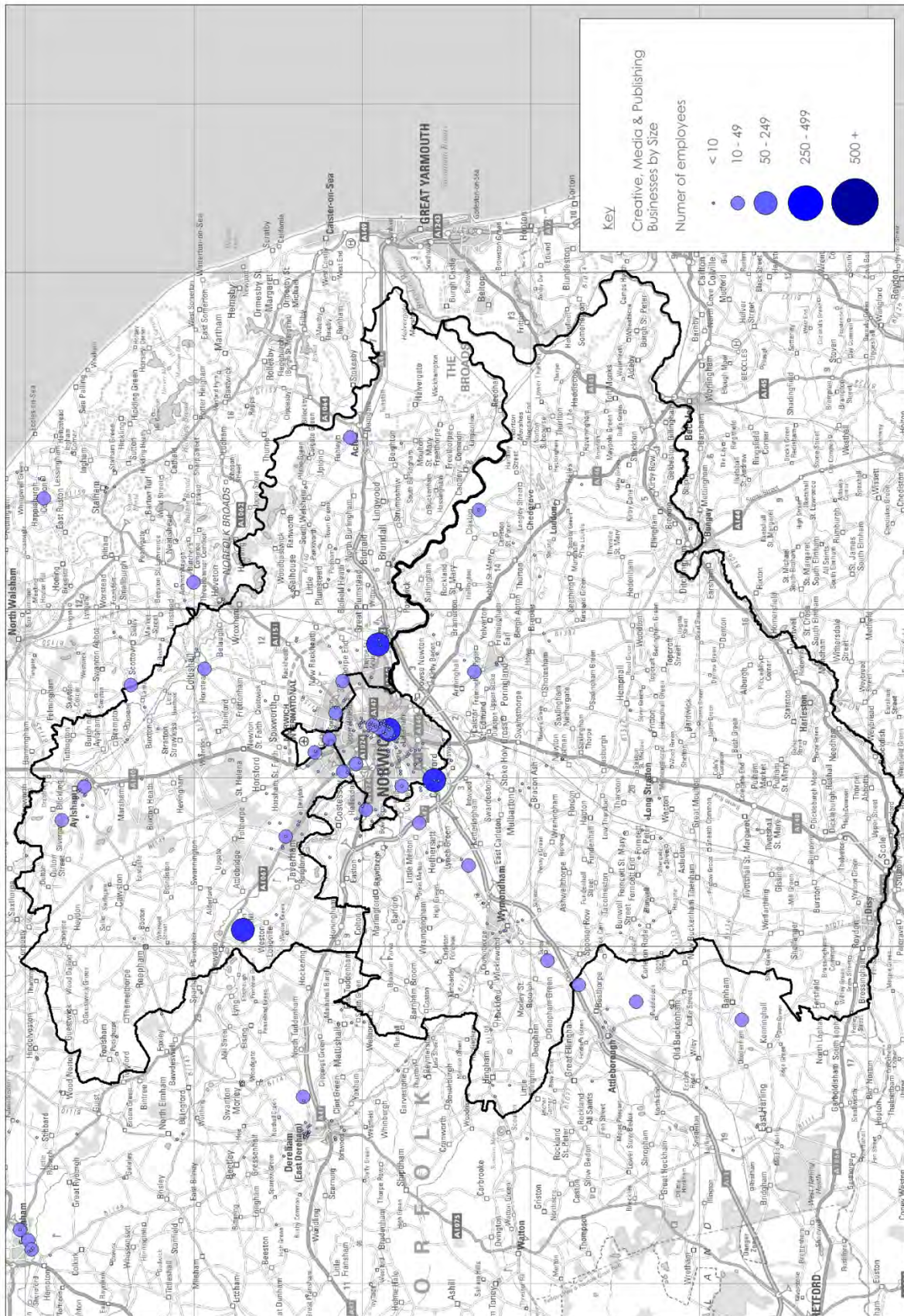
- 4.4 Growth locations are the hubs or nodes within a cluster, which forms a local economic area, where the majority of economic and commercial activity takes place. These centres typically attract the co-location of businesses, jobs and homes and therefore form the principal economic drivers of the geography in which the cluster/local economic area is located.
- 4.5 Figure 16, Figure 17 and Figure 18 show the geographies of business that specialise in finance and business services, the creative sector, media and publishing, and production and manufacturing respectively. The maps show that the majority of high value businesses cluster in the city centre and eight growth locations that are identified in Figure 19. The geographies of these businesses provide further support to the use of the NPA as the reference geography for this study because the majority, particularly those which are large, fall within this area.
- 4.6 The characteristics of these growth locations are tabulated below in Table 1. The table draws out key figures for these hubs, with reference to both commercial and residential potential, and which sectors they cater to. The table also makes reference to key infrastructure that is supporting continued growth. These centres are considered to be the points around which the NPA and the Norwich economy are plotted.

Figure 17: Business unit count based on number of employees: Finance, Business, R&D and Administrative Services



Source: EGi, 2017

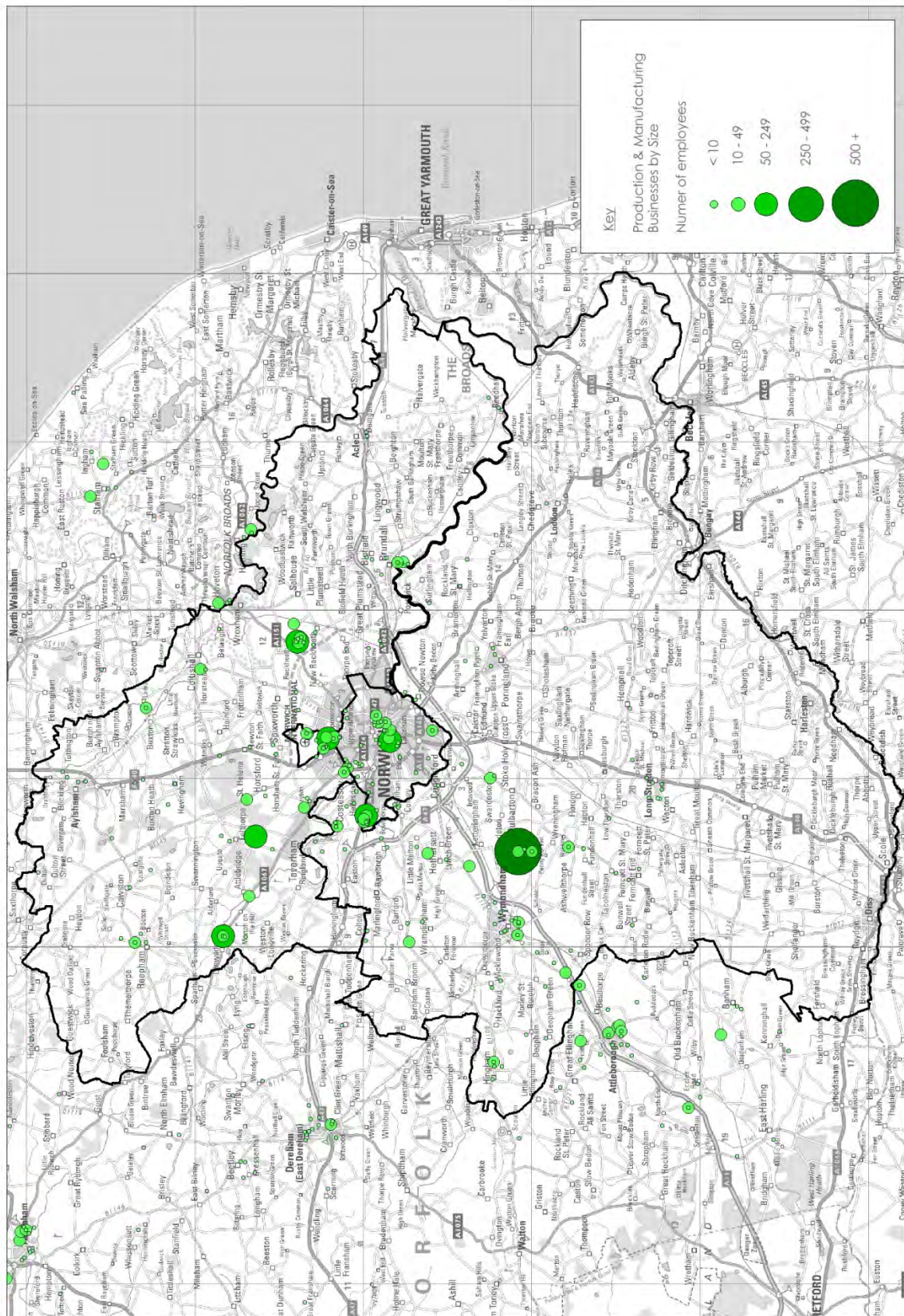
Figure 18: Business unit count based on number of employees: Creative, Media and Publishing Businesses



Map reproduced from GfP (2015 edition), MapData © Collins Bartholomew Ltd (2015), Data sourced from Office for National Statistics © Crown copyright 2016

Source: GVA, EGi, 2017

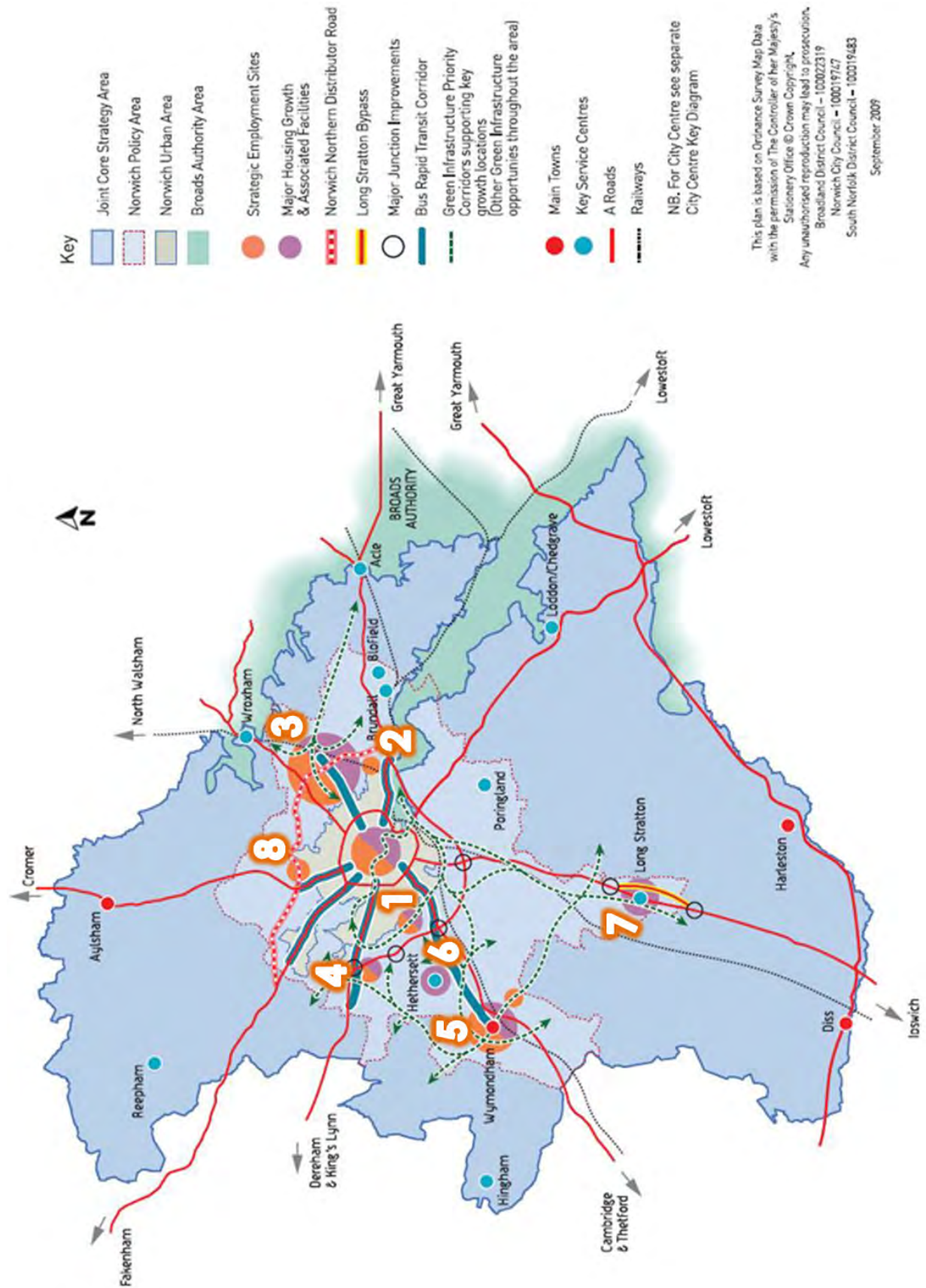
Figure 19: Business unit count based on number of employees: Production and Manufacturing Businesses



Map reproduced from GBPro 200 GB (2015 edition). MapData © Cairns Barnismorew Ltd (2015). Data sourced from Office for National Statistics © Crown copyright 2014.

Source: GVA, EGi, 2017

Figure 20: Existing Major Growth Locations



Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

Table 1: Growth Locations, influencing infrastructure/ growth corridors and priority growth sectors

Ref No	Growth Location	Description	Infrastructure Influence	Priority Growth Sectors
1	Norwich Research Park/ Cringleford	<ul style="list-style-type: none"> <li>Renowned <b>Science Park</b> and centre for employment where nationally and internationally significant research is undertaken.</li> <li>The site is set over 230 ha and includes a community of over 75 businesses and 3,000 scientists with strengths in food, diet and health.</li> <li>Home to the John Innes Centre, University of East Anglia, Genome Analysis Centre, Institute of Food Research, Sainsbury Laboratory and the Norfolk and Norwich University Hospital (N&amp;N).</li> <li>Importance of sector strengths to the UK economy likely to drive expansion alongside further co-location of similar businesses, spin offs and residential development.</li> <li>Expansion likely to be set over 55 ha with 1,200 dwellings planned.</li> <li>Expected cost of associated road works: £13,000,000.</li> </ul>	A11(Tech Corridor) and A47	Life Sciences and KIBs
2	Broadland Business Park	<ul style="list-style-type: none"> <li><b>Large business park</b> located on the eastern fringe of the Norwich urban area which includes a collection of grade A offices and industrial units.</li> <li>The park is home to many of the largest companies in the region, including Aviva, Lovewell Blake, and RBS.</li> <li>The business park is one of the best connected in the NPA with direct <b>access to the A47</b></li> </ul>	Access to A47 and Northern Distributor Road	KIBs, Financial Services, Food & Drink, and Advanced Manufacturing

Ref No	Growth Location	Description	Infrastructure Influence	Priority Growth Sectors
		<p><b>and soon to be completed NDR.</b></p> <ul style="list-style-type: none"> <li>As a relatively new development location, further space is available on existing sites and additional sites are allocated to enable continued expansion of the location.</li> <li>The site will continue to present some of best opportunities for businesses that require large and high quality space in proximity to urban amenities and a high skill labour pool.</li> </ul>		
3	Old Catton Sprowston, Rackheath, St Andrew Growth Triangle	<ul style="list-style-type: none"> <li>Rackheath Industrial Estate is an established site located to the northeast of Norwich with a range of industrial occupiers.</li> <li>The site is set to benefit from the <b>completion of the NDR</b> that will lie in proximity and greatly increase connectivity.</li> <li>The site is also set to form part of the <b>North Rackheath masterplan</b> and wider growth triangle which is planned to deliver a large amount of residential and commercial floorspace.</li> <li><b>The Growth Triangle</b> is expected to have capacity for over 13,000 homes and 25 ha of employment land.</li> <li>Expected cost of the Growth Triangle internal link road: £14,350,000.</li> </ul>	Northern Distributor Road	Advanced Manufacturing and Food & Drink
4	Longwater/ Easton/	<ul style="list-style-type: none"> <li>Longwater is an industrial area located to the west of Norwich with direct access to</li> </ul>	Access to A47 and completion	Food & Drink



Ref No	Growth Location	Description	Infrastructure Influence	Priority Growth Sectors
	Costessey	<p>the A47.</p> <ul style="list-style-type: none"> <li>The area has historically had a large amount of open storage use that is now seeing change towards big box retail and industrial units.</li> <li><b>Access to the A47</b> has enabled occupiers such as Pasta Foods to locate on site and proximity to Norwich researchpark and the Bowthorpe Employment Area suggest potential for opportunities for potential occupiers in the food production and technology sector.</li> <li>The site is also set to <b>benefit from the completion of the NDR</b> that will lie in proximity and further improve connectivity.</li> </ul>	of Northern Distributor Road	
5	Wymondham and Hethel	<ul style="list-style-type: none"> <li>Wymondham is a town located to the south west of Norwich following the A11. Hethel is a rural location that lies in proximity to Wymondham.</li> <li>The area has recently seen substantial development across its industrial sites which cater to a range of sectors in typically sizeable units.</li> <li><b>Hethel</b> is the home to Group Lotus, which is located rurally to accommodate a test track, and the high value Knowles Engineering Centre.</li> <li>Regarding development, <b>2,200 homes</b> are planning for Wymondham and, on land between the Group Lotus and Knowles Engineering Centre sites, a 20ha</li> </ul>	A11 (Tech Corridor)	Advanced Manufacturing and KIBs

Ref No	Growth Location	Description	Infrastructure Influence	Priority Growth Sectors
		Technology Park is planned for Hethel.		
6	Hethersett	<ul style="list-style-type: none"> <li>Hethersett is a large village located to the south west of Norwich following the A11.</li> <li>The <b>Hethersett North masterplan</b> is expected to create a large contribution to meeting the Central Norfolk housing need with 1,196 homes planned for the area.</li> <li>The development is likely to make a large contribution to the talent pool, providing high quality homes to attract skilled workers.</li> </ul>	A11 (Tech Corridor) and A47	
7	Long Stratton	<ul style="list-style-type: none"> <li>Long Stratton is a civil parish to the south of Norwich following the A140.</li> <li>The <b>Long Stratton Area Action Plan</b> was adopted in 2016 and anticipates that a minimum of 1,800 new homes and 12 ha of employment land.</li> <li>Development is likely to create a shift change for the area, which will be supported by the delivery of the Long Stratton bypass, creating a new centre in the NPA.</li> </ul>	A140, Long Stratton Bypass	
8	Norwich Airport	<ul style="list-style-type: none"> <li>Norwich Airport is located towards the north of Norwich and has a large site with associated industrial use on its boundary.</li> <li><b>The NDR</b>, when completed, will pass to the north of the airport and is set to create a series of development opportunities on airport land and to the north of it.</li> <li>Following the completion of</li> </ul>	Northern Distributor Road	Advanced Manufacturing; ICT

Ref No	Growth Location	Description	Infrastructure Influence	Priority Growth Sectors
		the NDR, further phases of the <b>Aeropark</b> development are also expected to continue, which previously promised 1,000 jobs set over a 100 acre site to secure the future of the airport.		

## Key Infrastructure

- 4.7 Infrastructure acts as the spokes between nodes that facilitates accessibility and connectivity to create the wider cluster system that underpins a local economic area. In this sense, an effective transport network is critical to fostering sustained economic growth within a local economy. These connections enable businesses to reach their customers, connect with suppliers and draw from a wide pool of labour that is either located in other hubs/nodes within the area or further afield. These connections have led to Norwich becoming an economic centre in East Anglia, with strong multi-transport connections between NPA centres and to other regional economies such as London and Cambridge.
- 4.8 This section considers both existing and yet to be completed infrastructure, discussing the value of existing transport links and the growth that is likely to come forward with further connectivity. Figure 19 above and Figure 20 below show the existing and proposed infrastructure schemes that encourage growth in the NPA. Much of the proposed infrastructure provides improved links and accessibility to existing growth locations, but also provides new development opportunities on sites that were previously poorly connected. The characteristics of key infrastructure are tabulated in Table 2 which includes descriptions and the particular growth locations that these transport links support.



Table 2: Key Infrastructure and growth Locations

Key Infrastructure	Description	Growth Locations Principally Supported
<b>Northern Distributor Road</b>	<ul style="list-style-type: none"> <li>• The Northern Distributor is a 20km dual carriageway road under construction to run from the A47 at Postwick, east of Norwich, to the A1067 Fakenham Road north of Taverham.</li> <li>• As alluded to above, the NDR will improve accessibility to a series of growth locations alongside improving connection to the A47 and routes that lead north out of Norwich.</li> <li>• The route is also set to reduce cross-city congestion and in doing so will support the Norwich infrastructure stately to encourage more sustainable transport in the city.</li> <li>• Overall, the NDR is expected to deliver £1bn of economic benefits to Norfolk and support the creation of new businesses and jobs.</li> <li>• The £96.5 million committed by the Department for Transport (DfT) for the Northern Distributor Road (NDR) is ones of the largest single transport investments in the East of England since the 2008 financial crash.</li> <li>• A further £40 million is drawn from the Community Infrastructure Levy, the Norfolk County Council, the New Anglia LEP, and Growth Points Fund.</li> <li>• The overall expected cost is £178,950,000.</li> </ul>	<ul style="list-style-type: none"> <li>• Longwater/ Easton/ Cotessey</li> <li>• Norwich Airport</li> <li>• Old Catton Sprowston, Rackheath, St Andrew Growth Triangle</li> <li>• Broadland Business Park</li> </ul>
<b>A11 Corridor (Tech Corridor)</b>	<ul style="list-style-type: none"> <li>• The <b>A11 links Norwich to Cambridge</b> and leads to the M11 motorway for London.</li> <li>• The A11 provides access to several growth locations that are likely to see some of the strongest</li> </ul>	<ul style="list-style-type: none"> <li>• Norwich Research Park/ Cringleford</li> <li>• Hethersett</li> <li>• Wymondham and Hethel</li> </ul>

Key Infrastructure	Description	Growth Locations Principally Supported
	<p>growth, particularly regarding the delivery of homes, in the NPA.</p> <ul style="list-style-type: none"> <li>• Following the dualling of the 64 mile route between Norwich and Cambridge, the road is now considered a tech corridor.</li> <li>• Activity on the tech corridor is expected to create £558m for the economy and the NPA will capture a sizeable amount of this in its growth locations and from Cambridge overflow.</li> </ul>	
<b>A47 Corridor/ Bypass</b>	<ul style="list-style-type: none"> <li>• The A47 bypasses Norwich to the south from Longwater in the west to Postwick in the east.</li> <li>• The A47 is the main east west connection in northern East Anglia which connects Norwich with Great Yarmouth to the east and to Kings Lynn to the west, which ultimately connects to Peterborough.</li> <li>• The A47 is a key transport route for Norwich and improves the connectivity for arguably all of its growth locations.</li> <li>• 6 schemes are planned to improve the A47 with 2 falling within the NPA at Easton and the A47/A11 Thickthorn junction. The collective cost is estimated at £300 million.</li> <li>• Figure 20 shows that junction improvements are planned for most of the junctions on major roads that pass the A47 as they lead into Norwich.</li> <li>• Part of the improvements are likely to include a park and ride at Thickthorn that is expected to cost £30 million.</li> </ul>	<ul style="list-style-type: none"> <li>• Longwater/ Easton/ Cotessey</li> <li>• Broadland Business Park</li> <li>• Norwich Research Park/ Cringleford</li> </ul>
<b>A140 Corridor/ Long Stratton Bypass</b>	<ul style="list-style-type: none"> <li>• The Long Stratton Bypass was proposed as part of the Long Stratton Area Action Plan which</li> </ul>	<ul style="list-style-type: none"> <li>• Long Stratton</li> </ul>

Key Infrastructure	Description	Growth Locations Principally Supported
	<p>was formally adopted in May 2016.</p> <ul style="list-style-type: none"> <li>The scheme is expected to cost £25 million and facilitate the delivery of 1,800 homes by 2026.</li> <li>The route will relieve traffic through the centre of Long Stratton and improve the route to Ipswich.</li> </ul>	
<p><b>Norwich International Airport</b></p>	<ul style="list-style-type: none"> <li>Norwich Airport gives the city an international presence with domestic services linking to locations across the UK and over 1,000 worldwide destinations from the connection at Schiphol, Amsterdam.</li> <li>The airport provides a crucial service given that nearest airport following Norwich is London Stansted which lies 86 miles away.</li> <li>The airport not only forms a transport hub but has attracted businesses in associated sectors to co-locate around the site.</li> <li>To secure the future of the airport, an Aeropark development was proposed which delivered 150 jobs in its first phase.</li> <li>Further phases of the Aeropark have outline consent and once delivered will unlock a further c.850 new jobs 100 ha of land, focused on aviation related.</li> </ul>	<ul style="list-style-type: none"> <li>Supports all with particular focus on:</li> <li>Norwich Airport</li> </ul>
<p><b>Rail Improvements</b></p>	<ul style="list-style-type: none"> <li>Norwich railway station forms the northern terminus of the Great Eastern Main Line with journey times to London Liverpool Street of less than two hours.</li> <li>Norwich also has rail connections to Midlands and the North, and regional services to Cambridge, Sheringham and Great Yarmouth.</li> <li>Norwich is also the site of Norwich Crown Point Traction</li> </ul>	<ul style="list-style-type: none"> <li>Supports all with focus on:</li> <li>Old Catton Sprowston, Rackheath, St Andrew Growth Triangle</li> <li>Broadland Business Park</li> </ul>

Key Infrastructure	Description	Growth Locations Principally Supported
	<p>Maintenance Depot.</p> <ul style="list-style-type: none"> <li>As shown in Figure 20 rail stations have been considered the Rackheath and Broadland Business Park growth locations which would provide regional access to these sites via public transport.</li> <li>An extension of the East-West Rail (EWR) line is also being considered that would connect Cambridge to Bedford and provide direct access to the regional centres of Oxford and Milton Keynes in the South East.</li> </ul>	

### Game Changer: East-West Rail

The East West Rail (EWR) line received support in the 2011 Autumn Statement with £270 million confirmed in funding and a subsequent £45 million package from local authorities that make up the EWR corridor. A review of the Eastern Section of the EWR, which will connect to Norwich via existing tracks that require dualling, is being undertaken by Atkins Consultants and conclusions can be expected in May 2017. An update of the economic case undertaken in 2014 by ARUP suggests that the EWR line could boost the regional economy by £72.7 million per annum and deliver a benefit cost ratio (BCR) of 6.3. It can be expected that these benefits would be proportional in the Greater Norwich local economy, and may prove particularly acute given Norfolk's less central location and need for connectivity.

Figure 22: East West Rail Routes



Source: Network Rail, 2017



## City centre

- 4.9 The Norwich city centre is the primary employment centre in the Norwich economy. As shown in the property section, the city centre accommodates 68% of the existing floorspace in the NPA and a sizeable amount of industrial floorspace. The core is home a variety of businesses, particularly those within finance and knowledge intensive businesses (KIBs). Further, the core is seeing growth with 100,000m<sup>2</sup> of office floorspace proposed for the city centre<sup>3</sup>.
- 4.10 The city centre is also a hub for education and the arts based around the City College, and the Norwich University of the Arts with wider provision, including Easton & Otley College, in the city's rural hinterland. These institutions are critical to supplying the city with a skilled labour force across a range of sectors, including the KIBs, technology and food/land based science and research
- 4.11 Norwich University of the Arts provides a strong supply of graduates in video games art, design, digital photography, and film, underpinning the strength of the local digital technology sector.
- 4.12 The University of East Anglia, is a critical asset to the Norwich economy, attracting students from across the UK and internationally. It provides market leading research and development activity in a range of core growth sectors including environmental science and climate change, health, food science and digital technology and is a key supporting factor in promoting the city on the international stage. Its specialisms in the life and health sciences in particular underpin major links to other hubs such as Cambridge, helping support a wider ecosystem of activity.
- 4.13 Teaching activity in fields such as legal and accounting, computer science, software engineering and film, television and media studies all provide a strong workforce for businesses located in (or seeking to locate in) the city.
- 4.14 A talented labour pool is not only important for meeting the needs of businesses but also helps to contribute to the amenities and services that make a place desirable to live and work. As is shown in the property section, Norwich is one of the most desirable places to live in the UK and this is the result of such amenities as well as factors such as access to good jobs. The city has an historic character, which is supported by the prominence of the Norman castle and cathedral, as well as a strong retail and leisure offer than includes a series of independent stores set within the Norwich lanes. The strength of these amenities was acknowledged within the winning of the Great British High Street Award in 2014 in the city category.
- 4.15 Such amenities are valued for attracting skilled labour and retaining graduates who are some of the most mobile in the UK labour force. However, the city centre has been struggling in recent years to retain office occupancy levels as shown in the property section of this report, albeit some

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<sup>3</sup> CoStar

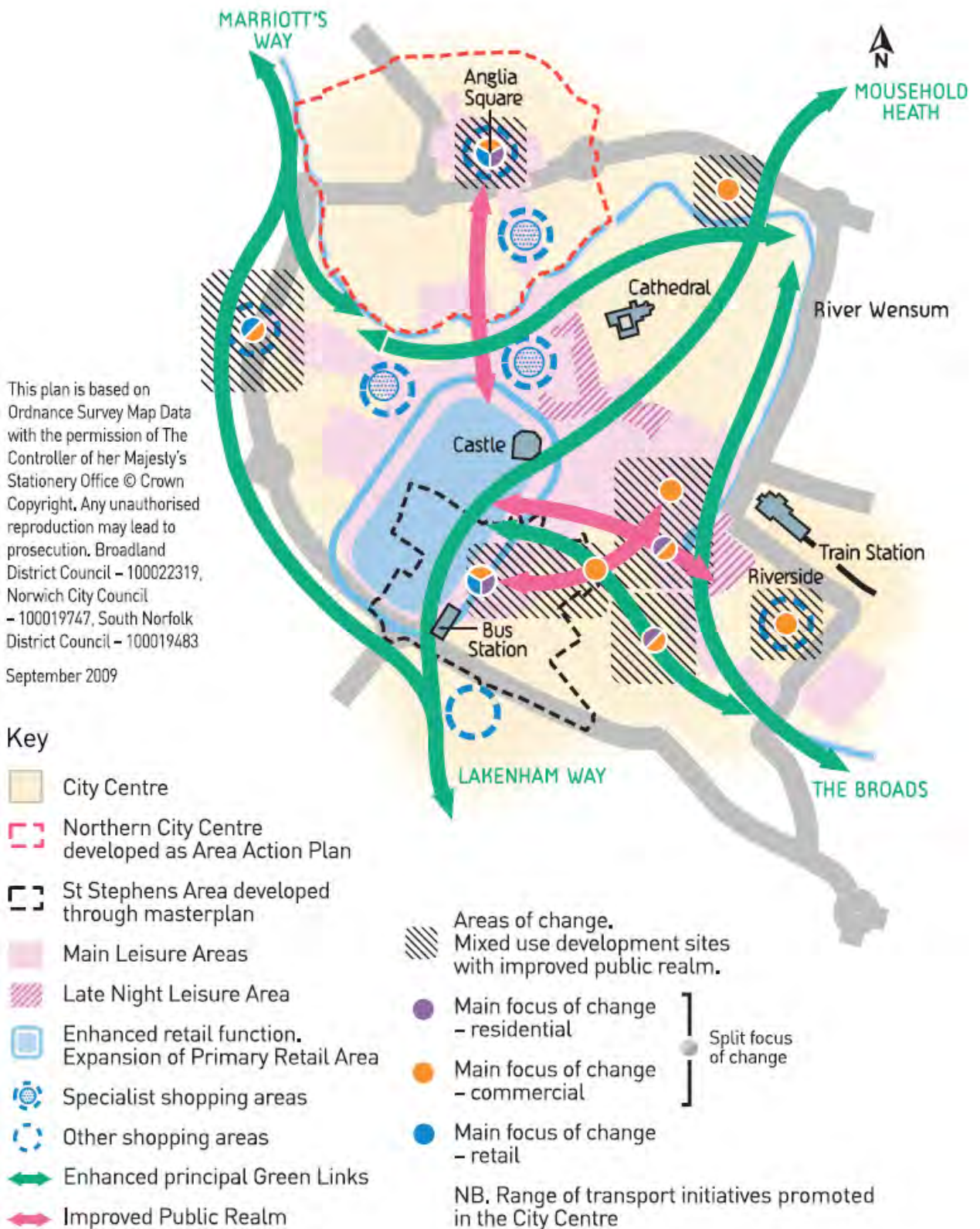
loss as a result of change of use, and now competes with peripheral locations, exemplified by the relocation of parts of Aviva's activity the centre to the Broadland business park.

- 4.16 Taking a more united approach across the broader NPA area, rather than the local authority level, will aid in managing some of the movements in a way that works for Norwich as a whole. There is, however, scope to attract businesses to Norwich, particular given the noted desirability of the city and the quality of its amenities. The 2016 Tech Nation report<sup>4</sup> identifies Norwich as an early-stage cluster, with potential across a range of tech sectors and a burgeoning network of tech groups such as Hot Source, Norfolk Developers and SyncNorwich.
- 4.17 Currently, as noted in previous sections, there is an existing stock of space available within the city centre, however only a small share provides the quality and nature of space that is likely to be attractive to suit tech businesses, particularly start-ups. The Tech Nation report notes that co-working spaces such as Whitespace are providing affordable space for startups and helping the market, however our assessment is that further space will be required of the appropriate type/quality.
- 4.18 Tech Nation also noted wider challenges to startups which are gradually being addressed, albeit more could be done. For example the challenge of access to finance is slowly being addressed with schemes such as Grants4Growth. Further, Norwich's key asset is its access to talent, which is commonly found to be the biggest issue for tech firms and KIBs more generally, with the third highest concentration of science and research parks in the country and two leading universities.
- 4.19 As the Tech Nation report finds, Norwich not only has a suite of amenities that are attractive to a range of businesses, but also has an existing cluster of KIB businesses and networks, affordable workspace, finance provision, and skilled labour force that makes the city attract to high value tech businesses. Providing evidence, 5,306 digital tech jobs were identified in Norwich, with many based in the core, creating £148m in GVA from digital firms that increased by 22% between 2010 and 2014. As suggested, there is clear potential to further improve on this existing strength and to build on what differentiates the core from peripheral locations and to attract businesses that prefer to locate in central, 'buzzing' locations.

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<sup>4</sup> [http://www.techcityuk.com/wp-content/uploads/2016/02/Tech-Nation-2016\\_FINAL-ONLINE-1.pdf](http://www.techcityuk.com/wp-content/uploads/2016/02/Tech-Nation-2016_FINAL-ONLINE-1.pdf)

Figure 23: Norwich City Centre



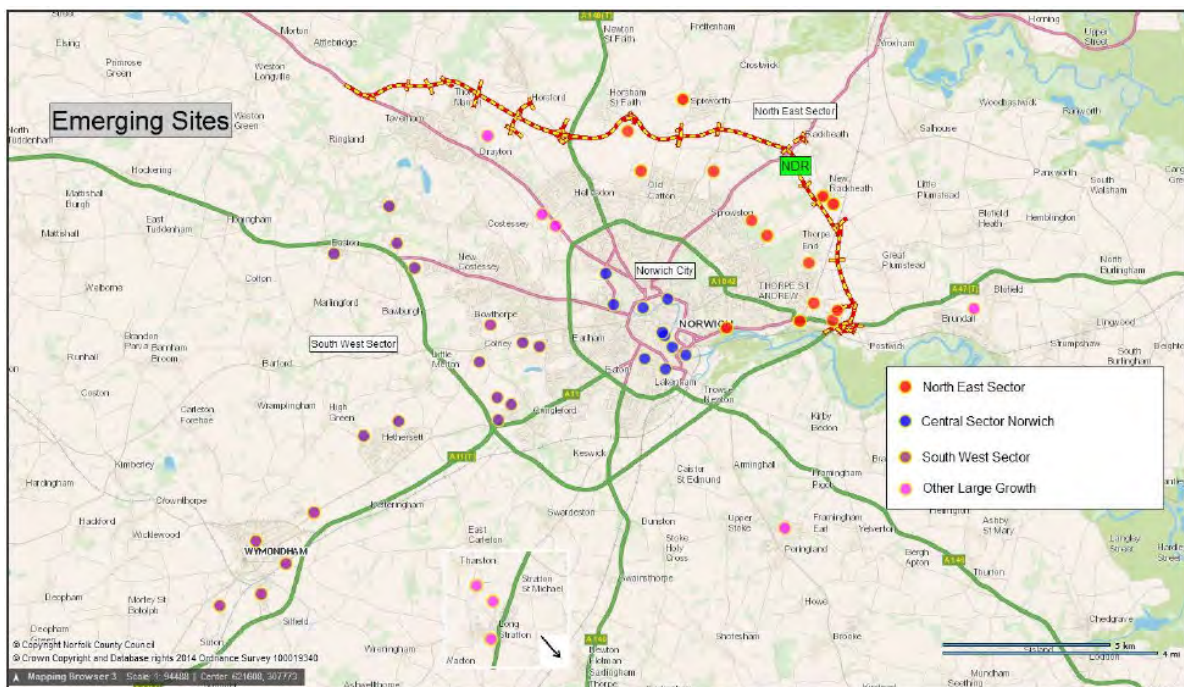
Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

## Summary/Findings

4.20 This section shows that the Norwich has series of key assets or ‘Growth Drivers’ that define the Norwich economy and deliver growth within it. The majority of commercial properties are located on or near these assets and, as shown below in Figure 23, many of the emerging sites in the NPA are too. Figure 24 provides a useful illustration showing how Norwich functions as a cluster and the assets that growth locations provide for the area. Overall, this section suggests that the NPA is in fact a good representation of how the Norwich economy functions and, given its existing use within policy, would function well as reference area for future growth potential.

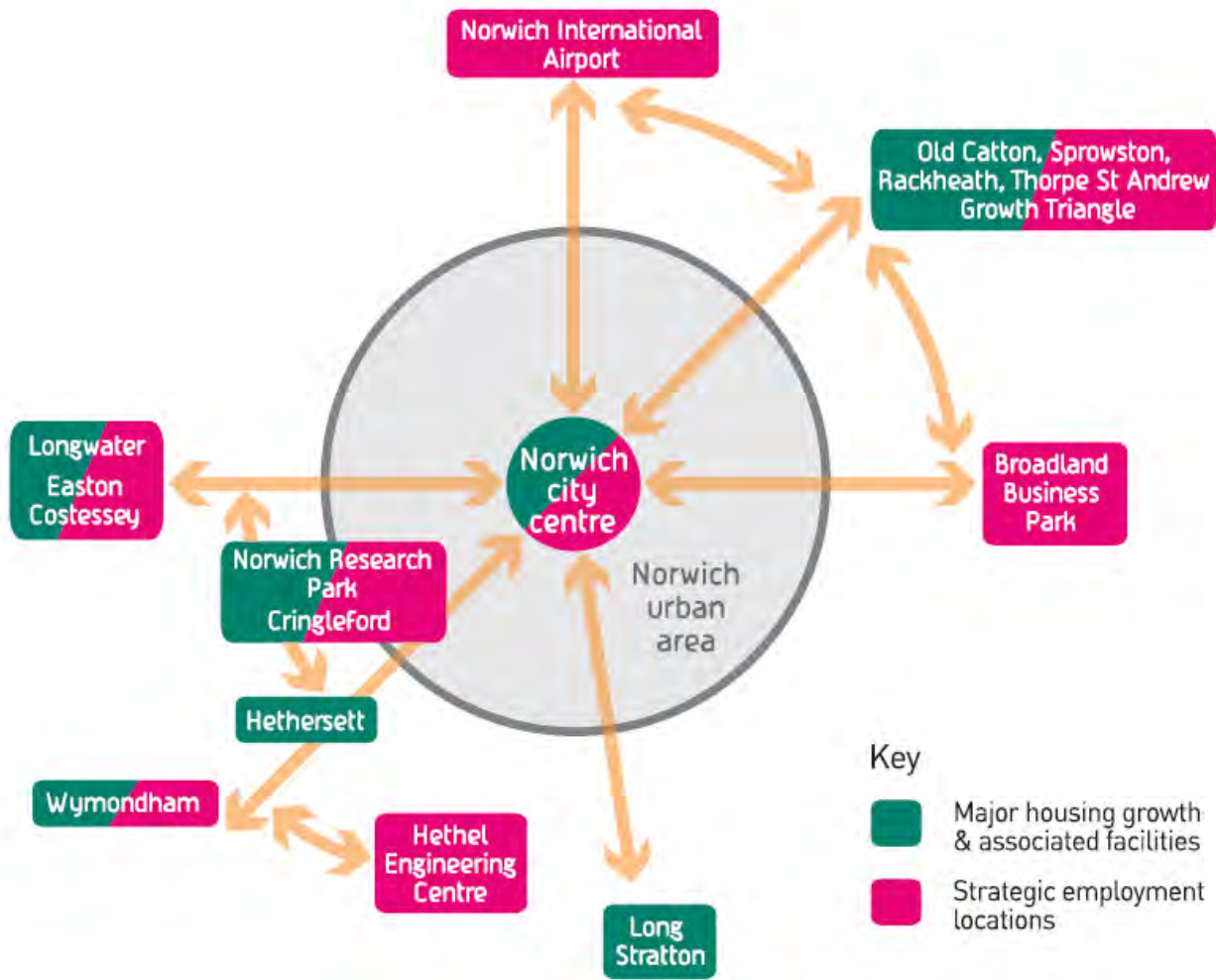
4.21 This section also shows that there is some competition between growth locations in the Norwich that may not be being managed effectively and is causing loss of office occupancy in the city centre. Management at the NPA level will aid to deliver a strategy that works better for Norwich as a whole, creating greater scope to attract more businesses to the NPA as well as better organising movements within it. Other sections in this document focus on growth sectors but this section highlights how the character of the city centre, and the property typology within it, is suited to tech firms and KIBs that function well within city centre locations that support networks and face to face working. There is an existing suite of amenities and services that support tech firms and Norwich would benefit from delivering a strategy that builds on these assets.

Figure 24: Emerging Sites shown to fall in Growth Locations and near Key Infrastructure



Source: Greater Norwich Infrastructure Plan, published in July 2016

Figure 25: Relationships between Norwich Growth Locations



Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

## 5. Conclusions

- 5.1 Our analysis explores several political and functional area geographies for Norwich. It illustrates the extent of influence that Norwich has over its sub-regional hinterland and the complexity of its catchments for jobs, labour and homes. Consequently, the local authority area poorly captures extensive growth opportunities positioned on the city's periphery while the overly large Greater Norwich area dilutes the concentration and intensity of more urban economic activity given it incorporates large rural areas and more natural assets such as the Broads. The analysis shows that NPA is useful reference geography because, it closely aligns with the functional economic areas and the majority of assets that are of strategic importance are located within this area.
- 5.2 Overall the property analysis suggests a lower demand for office space than industrial space across the NPA which is particularly acute in the city centre. Although a long term trend is difficult to pinpoint, there does appear to be some reduced activity in the office market. Examples such as the relocation of some of Aviva's activity from the core to the Broadland Business Park as well as potential negative impacts surrounding outcomes of the current political climate (such as Brexit) does suggest a need to capture changing needs of office and industrial typologies in line with location, occupier needs and sectoral focus.
- 5.3 When looking at the physical growth drivers in terms of infrastructure and growth locations, we found that there are points of significant infrastructure led growth locations that are coming forward in the Norwich Policy Area. Each of these growth locations are based on economic cores that are expected to be led by priority or growth sectors (referenced in the Part II and III of this report). Overall, our analysis shows that the NPA is in fact a good representation of the Norwich economic influence and, given its existing use within policy, would function well as reference area for the reach and extent of the Norwich economy.

## **APPENDIX 3**

### **SUSTAINABILITY APPRAISAL REVIEW**

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# North East Wymondham

Review of the Sustainability Appraisal supporting the Greater Norwich  
Local Plan Draft Strategy

March 2020

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## North East Wymondham

### Review of the Sustainability Appraisal supporting the Greater Norwich Local Plan Draft Strategy

Project Ref:	21389/A5/SA	
Status:	Draft for input	Final for issue
Issue/Rev:	01	02
Date:	March 2020	
Prepared by:	JM	
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## 1.0 Introduction

- 1.1 This report presents a review of the Sustainability Appraisal (SA) process supporting the Greater Norwich Local Plan (GNLP), which is at Regulation 18 stage<sup>1</sup>. The GNLP is being produced by Broadland District Council (BDC), Norwich City Council (NCC) and South Norfolk Council (SNC) working together with Norfolk County Council (NCC) through the Greater Norwich Development Partnership (GNDP) and will guide development up to 2038. The review has focused on the SA (which incorporates Strategic Environmental Assessment (SEA)) of the Greater Norwich Local Plan: Regulation 18 (C) SA Report (herein referred to as the Regulation 18 (C) SA Report), prepared by Lepus Consulting on behalf of the GNDP in January 2020<sup>2</sup>.
- 1.2 The Regulation 18 (C) SA Report has been published for consultation as part of the evidence base supporting the GNLP Draft Strategy. Whilst the review has focused on the latest SA report, reference has been made to earlier reports where necessary to give a view on the adequacy of the whole iterative SA process.
- 1.3 The GNDP published the SA Scoping Report in 2017<sup>3</sup>, following consultation with Historic England, Natural England, the Environment Agency and other relevant bodies in 2016. The SA Scoping Report forms the starting point for the SA and guides the evolution and assessment of the emerging GNLP. The next stage of the SA process involved the preparation and consultation of the Regulation 18 Interim SA<sup>4</sup>, which was prepared alongside the Regulation 18 Stage A Growth Options and Site Proposals Consultation in January to March 2018. The Regulation 18 (C) SA Report is the latest stage of the SA process.
- 1.4 A local plan draft containing a favoured option and the reasonable alternatives to that option, along with a draft SA report assessing the plan, will be consulted on prior to the publication of the local plan for submission. The 'final' SA report will then be submitted with the GNLP to the Secretary of State for examination in public.
- 1.5 The full SA review is included at Appendix 1. It uses a 'traffic light' scoring system to identify areas that would benefit from improvement (amber) and those elements of the SA process that are considered to comply fully with the requirements (green). No areas of major deficiency were identified in the SA (red).

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<sup>1</sup> GNDP, January 2020, The GNLP Draft Strategy Regulation 18 Consultation – 29<sup>th</sup> January to 16<sup>th</sup> March 2020.

<sup>2</sup> Lepus Consulting on behalf of the GNDP, January 2020, SA and SEA of the Greater Norwich Local Plan: Regulation 18 (C) SA Report.

<sup>3</sup> GNDP, March 2017, SA Scoping Report for the Greater Norwich Local Plan.

<sup>4</sup> GNDP, March 2018, Interim Sustainability Appraisal of the Greater Norwich Local Plan.

- 1.6 In addition, this report includes an appraisal of the development site 'North East Wymondham'. North East Wymondham has experienced recent growth over the last 10 years that extends built and committed development along Norwich Common and Tuttle's Lane towards Melton Road. The site is located in an area that has been subject to a number of planning applications and appeals which has culminated in consent for approximately 1,700 residential dwellings forming an urban extension to Wymondham. This is due to its strategic location along the Cambridge Norwich Growth Corridor, as set out within the Strategic Housing Market Assessment (SHMA)<sup>1</sup> Core Area and the Norwich Policy Area (NPA) identified within the Joint Core Strategy (JCS)<sup>2</sup>.
- 1.7 The Regulation 18 GNLP, identifies Wymondham for an allocation of only 100 new dwellings. However, paragraph 329 confirms "due to its strategic location" the town is also identified for a contingency of 1,000 additional dwellings to be brought forward if delivery of housing in the Plan area does not meet local plan targets, although no specific site is identified at this stage.
- 1.8 The site-specific appraisal is included at Appendix 2 and has been undertaken by Barton Willmore utilising the same matrix methodology and fifteen SA Objectives used to consider the alternative site options within the Regulation 18 (C) SA Report for inclusion within the GNLP. The matrix assessment with a colour coded key is a method often used for the assessment of site options in SAs, to make the comparison of the positive and negative sustainability aspects of a site clear and consistent. The appraisal provides commentary on the score that we consider should be awarded for each objective indicator question. The appraisal draws on the extensive evidence based available for the site, including the draft masterplan and draft Environmental Statement (ES), which would be submitted in support of a planning application in due course.

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<sup>1</sup> Opinion Research Services, June 2017, Central Norfolk Strategic Housing Market Assessment 2017 Report of Findings

<sup>2</sup> GNDP, January 2014, Joint Core Strategy for Broadland, Norwich and South Norfolk, adopted March 2011 and amended in January 2014.

## 2.0 Review of SA

### Purpose of Review

- 2.1 A review of the SA documents has been undertaken against the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the "SEA Regulations") and Section 19 of the Planning and Compulsory Purchase Act 2004 (the "Act"), which sets out requirements for SA. SA is a complex and legalistic process and should be undertaken iteratively, alongside the preparation of the Plan.
- 2.2 A Local Plan must be prepared in accordance with Section 39 of the Act "*with the objective of contributing to the achievement of sustainable development*". It should therefore be informed by the SA process, which itself must comply with the SEA Regulations.
- 2.3 This review has sought to identify any areas of the SA that would benefit from further focus or clarity in order to ensure that the Plan is determined as sound at Examination.

### Review Summary

- 2.4 No areas of major deficiency were identified in the SA.
- 2.5 The following areas of the SA would potentially benefit from additional consideration:
- **Existing environment (Habitats Regulations Assessment (HRA))** – A HRA has been completed for the Regulation 18 Draft Plan and should be referenced in the Regulation 18 (C) SA Report. Briefly outlining the conclusions of the HRA would give more meaning to the assessment of ecological effects, particularly when assessing the sites and the decisions made and would make the argument that the findings have been incorporated into the SA more robust. There is no evidence that cumulative effects have been assessed in relation to European sites, which would have been the case for in-combination effects in the HRA, for legal compliance. Given the need for assessments to be coordinated, it would be helpful to have more information within the Regulation 18 (C) SA Report on the HRA undertaken for the Local Plan to date.
  - **Relevant Policies, Plans and Programmes** - The Regulation 18 (C) SA Report does not adequately reference the Cambridge Norwich Growth Corridor, SHMA Core Area or the NPA.
  - **Likely significant effects on the environment (cumulative effects)** – A definition for short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects is not provided and would be helpful for clarity. Cumulative effects are only mentioned in relation to major

negative scores and there is no explanation of how these are considered within each topic. The approach to the assessment of cumulative effects is not well outlined and seems inconsistent between topics. SA Objectives 3 and 14 are the only Objectives that specifically mention cumulative effects in the assumptions and methodologies. In addition, there is no consideration of how each of the SA Objectives might interact with one another.

- **Reasonable alternatives** – Additional information on the site selection process would be helpful, for example more justification where sites have been excluded or options narrowed down. This should be reflected in the iterations of the SA and would make the process more robust and transparent.
- **Reasonable alternatives** – The assessment conclusions within Section 5 suggest that all sites/policies would have mixed effects with regards to sustainability and that it is not possible to identify a best performing option. The appraisal of the site in Bunwell against SA Objective 1 – Air Quality and Noise has been based on the number of new dwellings proposed (seven) and the site is awarded a negligible score. The sites within the Wymondham cluster have been awarded minor negative/major negative scores, even though some sites propose similar numbers of new dwellings (e.g. ten). It does not appear to have been taken into account within the explanatory text that the sites in Wymondham are located within close proximity to local facilities, public transport, leisure and employment opportunities, which would help to reduce the need for travel by car, thereby reducing emissions and impacts on air quality. The site in Bunwell is located approximately 5.5km away from the nearest train station (Spooner Row, which does not have frequent services compared to the larger stations in Wymondham) and approximately 7.8km away from the nearest town (Attleborough), and would therefore likely require all new residents to use cars to access these facilities, rather than more sustainable modes of transport, which would worsen impacts on air quality. Therefore, the objectivity and parity of the assessment when assigning scores could be questioned.
- **Reasonable alternatives** – The 2017 SA Scoping Report includes Appendix 2 'Demonstrating Compliance with SEA Directive' – and states that this table will be completed and incorporated in subsequent SA reports to show how the SA has met legislative requirements. This table exercise has not been undertaken and included with the Regulation 18 (C) SA Report as set out in the Scoping Report. It would be helpful to set this out for the next Consultation.
- **Monitoring** – The suggested monitoring targets are very vague and there are still some gaps to be identified. Additional information could be included by using local/national targets, and further details on how the effects will be monitored, over what period, frequency etc would increase robustness in the next Consultation.
- **Non-Technical Summary** – There is no Non-Technical Summary (NTS) within the supporting documents. Whilst the GNLP is at the Regulation 18 Consultation stage, it is

good practice to have an NTS for each revision of the SA, so that it is clear how the SA has evolved through the iterations. This should be rectified at the Regulation 19 Consultation.

- 2.6 Despite the improvements suggested above, the SA is not considered deficient and provides a comprehensive discussion around the likely effects of policy and site options as evidence supporting the GNLP as a reasonable strategy. Section 6 of the 2018 Interim SA Report and Section 2.7 of the Regulation 18 (C) SA Report sets out the uncertainties and difficulties of predicting effects including assumptions made about secondary data, the accuracy of publicly available information and subjective judgement. Section 2.9 describes the assumptions made for the specific topics of the SA Objectives Assessments, which is helpful, for example where up to date ecological surveys and/or landscape and visual impact assessments have not been available and have limited the assessment of sites.
- 2.7 Additional information to address the points summarised above at the Regulation 19 Consultation stage would increase further the robustness of the SA and assist in achieving the right outcome at Examination.

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## 3.0 Site Appraisal

### Performance of Land North East of Wymondham

- 3.1 The site at Land North East of Wymondham performed well overall against the fifteen SA Objectives in the site appraisal undertaken as part of this SA Review (included at Appendix 2). The site was awarded a positive (+ or ++) score in 10 out of the 15 SA Objectives and neutral (0) score was awarded for 5 of the SA Objectives, for which no impacts or negligible impacts are anticipated. No negative (- or --) scores were awarded.
- 3.2 The current concept masterplan demonstrates that the development will add to the current services available in the area through the provision of land safeguarded for schools, a local centre and a health hub. The site has the potential to retain and enhance elements of the landscape and green infrastructure network and will provide a new Country Park. The concept masterplan would provide a network of new and enhanced pedestrian and cycling routes that permeate through the development site and connect to the wider surrounding area, which will benefit the health and wellbeing of the community as well as encourage future and existing residents to make short trips by non-motorised means.
- 3.3 The site is suitably located in proximity to local facilities, public transport, employment opportunities and green spaces in Wymondham, within walking distance or a bus journey from the bus stops on Norwich Common (B1172). The provision of integrated pedestrian and cycle routes mentioned above will provide direct connections to the public transport and local facilities. This will help to reduce pollution associated with motorised forms of transport and provide benefits for climate change mitigation and air quality.
- 3.4 The development will have a positive contribution to housing and a range of housing types, including affordable housing, will be provided which will meet a range of circumstances and needs in the community. The development presents the opportunity for better social connectivity with established communities in Wymondham and Hethersett. The development will also create new investment into the local area, providing benefits in terms of the economy and sustainability. The continued growth of North East Wymondham due to its strategic location along the Cambridge Norwich Growth Corridor, as set out within the SHMA Core Area and the NPA identified within the JCS, will help to promote Greater Norwich as a regional economic centre.
- 3.5 As part of the Environmental Impact Assessment (EIA) supporting the planning application for development at the site, an Environmental Statement (ES) has been prepared and will be submitted with the planning application. The site appraisal included the findings of the ES and

any additional supporting documents as necessary, including a Flood Risk Assessment (FRA), Drainage Strategy and Transport Assessment. In addition, a Construction Environmental Management Plan (CEMP) to be secured by a planning condition following planning approval will be prepared for the site in accordance with best practice measure and appropriate legislation, and therefore no likely impacts have been identified relating to air quality, dust, noise, flood risk or pollution.

### Summary of Site Appraisal

- 3.6 The site appraisal of Land North East of Wymondham is based on our knowledge of the site's opportunities and the Promoters commitment to delivery. This review concludes that the site should be selected for inclusion within any proposed site allocations within the GNLP, based upon its performance against the SA Objectives.

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## 4.0 Conclusion

- 4.1 There are some areas of the SA which would potentially benefit from additional consideration at the Regulation 19 Consultation stage which would increase further the robustness of the SA and assist in achieving the right outcome at Examination.
- 4.2 The potential development site Land North East of Wymondham should be selected for inclusion within any proposed site allocations within the GNLP based on its location, opportunities and performance against the SA Objectives, to aid sustainable development in this urban extension area. The Regulation 18 (C) SA Report does not adequately reference the Cambridge Norwich Growth Corridor, SHMA Core Area or the NPA, when it is clear from this review that the GNLP should focus development here.
- 4.3 The twelve site assessments in the Wymondham cluster (Section B.51 within Appendix B of the Regulation 18 (C) SA Report) show that Wymondham has been robustly and fairly assessed using appropriate methodology and justifiably represents a strategic location for growth. However, it is clear that where some of the twelve Wymondham sites are awarded negative scores in the SA, this is due to a lack of integrated mitigation, for example standard best practice mitigation usually implemented on such sites, a lack of survey information to properly assess potential impacts or a lack of knowledge of site design/masterplan commitments. Therefore, it could be argued that these scores are not realistic. Including site assessments undertaken post mitigation would likely result in more positive sustainable scores than those awarded.
- 4.4 Wymondham represents a sustainable location for development in Greater Norwich and decision making and the GNLP should prioritise development along the Cambridge Norwich Growth Corridor, within the SHMA Core Area and the NPA.

**APPENDIX 1:**  
**SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW**

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SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW		
	Compliance Key	Notes
<p><i>This is a compliance review against the requirements of the Regulations. It has not been undertaken by a legal professional. The SA process has been reviewed against the SEA Regulations and requirements of the Planning and Compulsory Purchase Act 2004 on SA. The following reports have been considered:</i></p> <p><i>2017 SA Scoping Report; 2018 Interim SA; and Jan 2020 Regulation 18 (C) SA Report.</i></p>		Meets requirements
		Improvements suggested
		Risk of challenge. Does not meet requirements
<b>SEA Regulations, Regulation 12 and Schedule 2 - Contents of Environmental Report</b>		
1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.		<p>Covered in 2017 SA Scoping Report, Section 4 of the 2018 Interim SA Report and Sections 1 and 2 of the Regulation 18 (C) SA Report.</p> <p>The introduction section of the 2017 SA Scoping Report sets out the purpose and objectives of the GNLP. Section 4 of the 2018 Interim SA Report builds on this information and evaluates the GNLP Objectives against the Sustainability objectives.</p> <p>Section 1.2 of the Regulation 18 (C) SA Report outlines the GNLP area and states that 'the GNLP will guide development across the three districts up to 2038, providing both strategic policies and site allocations to meet demand for housing and employment, as well as other land use matters'.</p> <p>Section 2 of the Regulation 18 (C) SA Report explains that the 2017 SA Scoping Report has identified other relevant plans, programmes and environmental protection objectives. Appendix 1 of the 2017 SA Scoping Report lists the plans, programmes and broader sustainability strategies that are relevant to the preparation of the GNLP and to the SA and the implications for the SA.</p> <p>The Regulation 18 (C) SA Report does not adequately reference the Cambridge Norwich Growth Corridor, SHMA Core Area and the NPA.</p>
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.		<p>Covered in 2017 SA Scoping Report, Section 2 of the 2018 Interim SA Report and Section 2 of the Regulation 18 (C) SA Report.</p> <p>Section 2 of the Regulation 18 (C) SA Report explains that the full baseline is provided in the 2017 SA Scoping Report, and this has been consulted on with relevant statutory bodies.</p> <p>Sections 1 to 15 of the 2017 SA Scoping Report provide commentary and data on a topic by topic basis. The topics cover the main sustainability issues relevant to the GNLP, which are considered to represent the current baseline position of the environment in Greater Norwich.</p> <p>Section 2.3. of the 2018 Interim SA Report provides a summary of the sustainability baseline and the likely evolution of the baseline without the implementation of the GNLP for each aspect of the environment.</p>
3. The environmental characteristics of areas likely to be significantly affected.		Covered in 2017 SA Scoping Report, Section 2 of the 2018 Interim SA Report and Section 2 of the Regulation 18 (C) SA Report.
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.		<p>Covered in 2017 SA Scoping Report and Section 3 of the Regulation 18 (C) SA Report.</p> <p>Section 3 of the Regulation 18 (C) SA Report acknowledges the protection afforded to European designated ecological sites (e.g. The Broads Special Area of Conservation (SAC) and Broadland Special Protection Area (SPA)/Ramsar, and the River Wensum and Norfolk Valley Fens SACs) by the Habitats Regulations, in accordance with Article 6(3) of the EU Habitats Directive.</p> <p>With regard to SA Objective 3 'Biodiversity, Geodiversity and Green Infrastructure' – Table 3.3 of the Regulation 18 (C) SA Report states that the HRA process will inform the development of the GNLP and the extent to which these policies mitigate potential negative impacts will be fully realised upon completion of the HRA. The HRA will inform policies relating specifically to these designated sites and the locations of future development to ensure no adverse impacts on site integrity of European sites.</p> <p>This does not provide confidence that the HRA and SA are well linked, as a HRA<sup>1</sup> has been completed for the Regulation 18 Draft Plan and therefore should be referenced here. Briefly outlining the conclusions of the HRA would give more meaning to the assessment of ecological effects, particularly when assessing the sites and the decisions made and would make the argument that the findings have been incorporated into the SA more robust. There is no evidence that cumulative effects have been assessed in relation to European sites, which would have been the case for in-combination effects in the HRA, for legal compliance. Given the need for assessments to be coordinated, it would be helpful to have more information within the Regulation 18 (C) SA Report on the HRA undertaken for the Local Plan to date.</p>

<sup>1</sup>The Landscape Partnership Ltd, December 2019, Habitats Regulations Assessment of Greater Norwich Regulation 18 Draft Plan for GNLP.

<p>5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.</p>		<p>Covered in 2017 SA Scoping Report and Section 2 and Appendix A of the Regulation 18 (C) SA Report.</p> <p>Appendix 1 and Sections 1 to 15 of the 2017 SA Scoping Report provide an overview of the international, national, regional and local environmental protection guidance and legislation for each environmental topic relevant to the preparation of the GNLP and to the SA. This includes limits or standards including e.g. National Air Quality Objectives, Water Framework Directive, Condition of Sites of Special Scientific Interest (SSSI), Carbon Emissions Targets.</p> <p>Appendix A of the Regulation 18 (C) SA Report includes the SA Framework and SA Objectives which shows how the assessment has considered those objectives and environmental considerations, and includes suggested indicators, which ensures the SA framework is aligned with relevant local issues.</p>
<p>6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as—</p> <p>(a) biodiversity;  (b) population;  (c) human health;  (d) fauna;  (e) flora;  (f) soil;  (g) water;  (h) air;  (i) climatic factors;  (j) material assets;  (k) cultural heritage, including architectural and archaeological heritage;  (l) landscape; and  (m) the inter-relationship between the issues referred to in subparagraphs (a) to (l).</p>		<p>Covered in 2017 SA Scoping Report, Section 3 of the 2018 Interim SA Report and Sections 2, 3, 4 and Appendix A, B and C of the Regulation 18 (C) SA Report.</p> <p>Section 2.10-2.24 and Appendix A of the Regulation 18 (C) SA Report outlines the SA Objectives and Framework used to assess the alternatives for likely significant effects on the environment.</p> <p>Figure 84 of the 2017 Scoping Report sets out the SA Framework which includes sustainability themes, objectives related to each theme that the GNLP should be trying to achieve, the decision-making criteria for site allocations and general policies, as well as suggested indicators and targets. Appendix A of the 2018 Interim SA Report provides narrative as to the criteria used to score each option against each SA Objective.</p> <p>Table 2.4 of the Regulation 18 (C) SA Report sets out the criteria that has been used to score significant effects for each SA Objective for each alternative (major negative to major positive). Boxes 2.1 to 2.15 present topic specific methods and assumptions which offer further insight into how each significant effect score was awarded.</p> <p>The following within the Regulation 18 (C) SA Report presents the SA matrices' results of the alternative options assessments:</p> <ul style="list-style-type: none"> <li>Section 3 'Site Assessments' and Appendix B provides an appraisal of each reasonable alternative site considered by the GNLP against the SA Objectives. Each appraisal includes a SA impact matrix which provides an indication of the nature and magnitude of impacts pre-mitigation.</li> <li>Section 4 'Policy Assessments' and Appendix C provides an assessment of the policies proposed in the GNLP. Each of the policies appraised have been assessed for their likely impacts on each SA Objective.</li> </ul> <p>Section 2.6.2 of the Regulation 18 (C) SA Report identifies the need to consider cumulative effects but does not provide a definition for short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, which would be helpful for clarity.</p> <p>Table 2.4 of the Regulation 18 (C) SA Report shows that a site which contributes to a cumulative significant effect, amongst other factors, is likely to be awarded a score of major negative. Cumulative effects are not mentioned in relation to major positive scores and there is no explanation of how these are considered within each topic. In the assessments it is unclear as to which options/topics were scored major negative due to cumulative effects and whether the rest were negligible/had no cumulative impacts. It would be helpful to clarify this.</p> <p>The approach to the assessment of cumulative effects is not well outlined and seems inconsistent between topics. For example, in Section 2 of the Regulation 18 (C) SA Report, SA Objectives 3 and 14 are the only Objectives that specifically mention cumulative effects in the assumptions and methodologies. In addition, there is no consideration of how each of the SA Objectives might interact with one another.</p>
<p>7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>		<p>Covered in 2017 SA Scoping Report, Section 9 of the 2018 Interim SA Report and Chapter 3 of the Regulation 18 (C) SA Report.</p> <p>Section 2.6.5 of the Regulation 18 (C) SA Report states that 'the nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed'.</p> <p>Section 3.3 of the Regulation 18 (C) SA Report identifies the mitigation and enhancement measures set out within the preferred policies of the GNLP and explains that these have been assessed within the SA process. Table 3.3 lists the potential adverse impacts that could arise following development at the alternative sites and lists which, if any, of the policies would be likely to help avoid these adverse impacts. If the policies would be unlikely to mitigate these adverse impacts, recommendations have been provided which are integrated in the GNLP throughout the plan-making process to help mitigate adverse impacts identified through the SA process.</p> <p>It is assumed that as the evidence base expands, more detailed environmental assessment work will be undertaken on each of the proposed alternative site options which will result in the identification of the specific mitigation and enhancement measures which will be fully considered in future SA's that accompany the next stage of the GNLP draft and individual planning applications for the site allocations. Including site assessments undertaken post mitigation in addition to pre mitigation would be helpful to identify how this has been integrated.</p>
<p>8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>		<p>Covered in 2017 SA Scoping Report, Section 5, 6, 7 and 8 of the 2018 Interim SA Report and Sections 2, 3, 4 and Appendix A, B and C of the Regulation 18 (C) SA Report.</p> <p>Section 2.10-2.24 and Appendix A of the Regulation 18 (C) SA Report outlines the SA Objectives and Framework used to assess the alternatives. Figure 84 of the 2017 Scoping Report sets out the SA Framework which includes sustainability themes, objectives related to each theme that the GNLP should be trying to achieve, the decision-making criteria for site allocations and general policies, as well as suggested indicators and targets. Section 5 of the 2018 Interim SA</p>

Report and Section 2 of the Regulation 18 (C) SA Report presents the methodology used for the assessment of reasonable alternatives. Appendix A of the 2018 Interim SA Report provides narrative as to the criteria used to score each option against each SA Objective.

The SA process has considered each of the policies and alternative sites considered by the GNDP against the fifteen Sustainability Objectives agreed during Scoping. The assessment has used a matrix with a colour coded key, a method often used for the assessment of site options in SAs, to make the comparison of the positive and negative sustainability aspects of a site clear and consistent. A set of appraisal questions are used for each objective which ensures the SA considers each effect within clear parameters. Table 2.4 of the Regulation 18 (C) SA Report sets out the criteria that has been used to score significant effects for each SA Objective for each alternative option (major negative to major positive). Boxes 2.1 to 2.15 present topic specific methods and assumptions which offer further insight into how each option was scored and explains the selection of reasonable alternatives.

Section 3 'Site Assessments' of the Regulation 18 (C) SA Report and Appendix B provides an appraisal of each reasonable alternative site considered by the GNDP. Each appraisal includes a SA impact matrix which provides an indication of the nature and magnitude of impacts pre-mitigation.

Section 4 'Policy Assessments' and Appendix C provides an assessment of the policies proposed in the GNLP. Each of the policies appraised have been assessed for their likely impacts on each SA Objective.

For the most part, the discussion around policy and site options is clear and evidence based and provides helpful clarity on why the GNLP is a reasonable strategy in terms of environmental impact and includes additional justification for the alternative sites considered (Appendix B and C – detailed information). References are given to the evidence base supporting alternatives e.g. the sites identified in the GNLP Housing and Economic Land Availability Addendum (HELAA).

The number of iterations of the SA shows that the process has been iterative and that there has not been a foregone conclusion throughout. Figure 1.2, Table 1.1 and Section 1.6 of the Regulation 18 (C) SA Report present a clear timeline of the stages of the plan-making and SA process, which includes:

- 'Call for Sites' phase;
- Regulation 18 Stage A 'Site Proposals and Growth Options' which consisted of approximately 600 site proposals as well as options for strategic policies;
- Regulation 18 Stage B 'New, Revised and Small Sites' included further submitted sites, revisions to some of the sites already consulted on and small sites, which total more than 200 sites; and
- Regulation 18 (C) SA Report, which provides an appraisal of the reasonable alternative sites and draft policies considered alongside the draft GNLP and includes further options provided by the plan-making team. This included 287 reasonable alternatives sites, for residential, employment or mixed uses and eleven draft policies which are presented in the GNLP Regulation 18 Draft Plan. A cluster analysis of the sites has been undertaken. Sites within each cluster are generally expected to have similar effects against the SA Objectives.

The reasonable alternative options for growth and policies are assessed within Sections 7 and 8 of the 2018 Interim SA Report and the policy assessments within the Regulation 18 (C) SA Report are derived from the policy alternatives assessed in the Interim SA.

The 2017 SA Scoping Report identifies in Section 19.1.5. that a 'means of identifying which alternatives are considered "reasonable" and which are not will be established. It is unclear how or if this has been done. Additional information on the site selection process would be helpful, for example more justification where sites have been excluded or options narrowed down. This should be reflected in the iterations of the SA and would make the process more robust and transparent.

The site assessment conclusions and policy assessment conclusions within Section 5 of the Regulation 18 (C) SA Report suggest that all sites/policies would have mixed effects with regards to sustainability and that it is not possible to identify a best performing option.

It should be clarified that SA is just one of a number of considerations that will be taken into account plan-makers when selecting preferred options for their plan – i.e. its recommendations won't necessarily be the overriding factor and the other factors involved should be detailed. Factors could include consultation responses, deliverability and conformity with national policy.

Section B.51 within Appendix B of the Regulation 18 (C) SA Report presents the appraisal of the Wymondham cluster, comprising twelve sites surrounding the town of Wymondham, located to the north west of South Norfolk District. Following a review of the twelve site assessments, and the appraisal of the site 'North East Wymondham', in Appendix 2 of this report, it is clear that a) Wymondham has been robustly and fairly assessed using appropriate methodology and justifiably represents a strategic location for growth and b) North East Wymondham should be included within any proposed site allocations within the GNLP on its sustainability credentials. The Regulation 18 (C) SA Report does not adequately reference the Cambridge Norwich Growth Corridor, SHMA Core Area or the NPA, when it is clear from this review that the GNLP should prioritise development here.

The site North East Wymondham is suitably located in proximity to local facilities, public transport, employment opportunities and green spaces, and will add to the current services available in the area through the provision of land safeguarded for schools, a local centre and a health hub. The site has the potential to retain and enhance elements of the landscape, green infrastructure network and pedestrian and cycling routes in the existing and new community, providing benefits in relation to several objectives, including climate change mitigation and adaptation, biodiversity, population and communities, health and economy. The cumulative beneficial impacts of these points altogether could be better considered when assessing the sustainability of the potential development site.

It is clear that where some of the twelve Wymondham sites are awarded negative scores in the SA, for example predominantly against SA1 Air Quality and Noise, SA2 Climate Change Mitigation and Adaptation, SA8 Health and SA14 Natural Resources, Waste and Contaminated Land, this is due to a lack of integrated mitigation, for example standard best practice mitigation usually implemented on such sites, a lack of survey information to properly assess potential impacts or a lack of knowledge of site design/masterplan commitments for example to habitat creation. Therefore, it could be argued that these scores are not realistic. Including site assessments undertaken post mitigation would be helpful and would likely result in more positive sustainable scores than those awarded.

		<p>The appraisal of the site in Bunwell (Section B.6 in Appendix B of the Regulation 18 (C) SA Report) against SA Objective 1 – Air Quality and Noise has been based on the number of new dwellings proposed (seven) and the site is awarded a negligible score. The sites within the Wymondham cluster (Section B.51 in Appendix B of the Regulation 18 (C) SA Report) have been awarded minor negative/major negative scores, even though some sites propose similar numbers of new dwellings (e.g. ten). It does not appear to have been taken into account within the explanatory text that the sites in Wymondham are located within close proximity to local facilities, public transport, leisure and employment opportunities, which would help to reduce the need for travel by car, thereby reducing emissions and impacts on air quality. The site in Bunwell is located approximately 5.5km away from the nearest train station (Spooner Row, which does not have frequent services compared to the larger stations in Wymondham) and approximately 7.8km away from the nearest town (Attleborough), and would therefore likely require all new residents to use cars to access these facilities, rather than more sustainable modes of transport, which would worsen impacts on air quality. Therefore, the objectivity and parity of the assessment when assigning scores could be questioned.</p> <p>Section 6 of the 2018 Interim SA Report and Section 2.7 of the Regulation 18 (C) SA Report sets out the uncertainties and difficulties of predicting effects including assumptions made about secondary data, the accuracy of publicly available information and subjective judgement. It also explains the brevity of explanation provided when certain judgments are made. Section 2.9 describes the assumptions made for the specific topics of the SA Objectives Assessments, which is helpful, for example where up to date ecological surveys and/or landscape and visual impact assessments have not been available and have limited the assessment of sites.</p> <p>The 2017 SA Scoping Report includes Appendix 2 'Demonstrating Compliance with SEA Directive' – and states that this table will be completed and incorporated in subsequent SA reports to show how the SA has met legislative requirements. This table exercise has not been undertaken and included with the Regulation 18 (C) SA Report as set out in the Scoping Report. It would be helpful to set this out for the next Consultation.</p>
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.		<p>Covered in 2017 SA Scoping Report, Section 10 of the 2018 Interim SA Report and Appendix A of the Regulation 18 (C) SA Report.</p> <p>The SA Framework in Appendix A of the Regulation 18 (C) SA Report sets out suggested indicators for each of the SA Objectives that should be used for monitoring the effects of the GNLP. The suggested targets which ensures the objective has been met are very vague for example the suggested target for SA Objective 1 is simply described as a 'decrease' and there are still some gaps 'to be identified'. Additional information could be included by using local/national targets, and further details on how the effects will be monitored, over what period, frequency etc would be more robust in the next Consultation.</p>
10. A non-technical summary of the information provided under paragraphs 1 to 9.		<p>There is no NTS within the supporting documents. There is no reference to the NTS within the SA.</p> <p>Whilst the GNLP is at the Regulation 18 Consultation stage, it is good practice to have an NTS for each revision of the SA, so that it is clear how the SA has evolved through the iterations. This should be rectified at the Regulation 19 Consultation. The NTS should be written in language that can be understood easily and summarise all key parts of the process, conclusions and next steps. Clear explanation should be provided for establishing the SA Objectives and for selecting the preferred options based on the impacts on the topics in the SA Objectives.</p>
<b>Planning and Compulsory Purchase Act 2004 - Section 19 Requirements for SA</b>		
<b>Stages from Planning Practice Guidance Paragraph: 013 Reference ID: 11-013-20140306. PPG paragraph references provided below, where relevant.</b>		
<b>A Setting the context and objectives, establishing the baseline and deciding on the scope</b>		
Identifying relevant policies, plans and programmes		<p>Covered in 2017 SA Scoping Report, Section 4 of the 2018 Interim SA Report and Sections 1 and 2 of the Regulation 18 (C) SA Report.</p> <p>The Regulation 18 (C) SA Report does not adequately reference the Cambridge Norwich Growth Corridor, SHMA Core Area and the NPA.</p>
Collecting baseline information		<p>Covered in 2017 SA Scoping Report, Section 2 of the 2018 Interim SA Report and Section 2 of the Regulation 18 (C) SA Report.</p> <p>Section 2 of the Regulation 18 (C) SA Report explains that the full baseline is provided in the 2017 SA Scoping Report and this has been consulted on with relevant statutory bodies.</p>
Identifying environmental and sustainability issues		<p>Covered in 2017 SA Scoping Report, Section 3 of the 2018 Interim SA Report and Sections 2, 3, 4 and Appendix A, B and C of the Regulation 18 (C) SA Report.</p> <p>Section 3 of the Regulation 18 (C) SA Report acknowledges the protection afforded to European designated ecological sites (e.g. The Broads Special Area of Conservation (SAC) and Broadland Special Protection Area (SPA)/Ramsar, and the River Wensum and Norfolk Valley Fens SACs) by the Habitats Regulations, in accordance with Article 6(3) of the EU Habitats Directive.</p> <p>A HRA has been completed for the Regulation 18 Draft Plan and therefore should be referenced here. Briefly outlining the conclusions of the HRA would give more meaning to the assessment of ecological effects, particularly when assessing the site allocations and the decisions made and would make the argument that the findings have been incorporated into the SA more robust. There is no evidence that cumulative effects have been assessed in relation to European sites, which would have been the case for in-combination effects in the HRA, for legal compliance. Given the need for assessments to be coordinated, it would be helpful to have more information within the Regulation 18 (C) SA Report on the HRA undertaken for the Local Plan to date.</p> <p>Section 2.10-2.24 and Appendix A of the Regulation 18 (C) SA Report outlines the SA Objectives and Framework used to assess the alternatives for likely significant effects on the environment. Table 2.4 of the Regulation 18 (C) SA Report sets out the criteria that has been used to score significant effects for each</p>

		<p>SA Objective for each alternative (major negative to major positive). The SA process has considered each of the policies and alternative sites in the GNLP draft strategy against the fifteen Sustainability Objectives agreed during Scoping, presented in Appendix B and C of the Regulation 18 (C) SA Report.</p> <p>Section 2.6.2 of the Regulation 18 (C) SA Report identifies the need to consider cumulative effects but does not provide a definition for short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, which would be helpful for clarity.</p> <p>Table 2.4 of the Regulation 18 (C) SA Report shows that a site which contributes to a cumulative significant effect, amongst other factors, is likely to be awarded a score of major negative. Cumulative effects are not mentioned in relation to major positive scores and there is no explanation of how these are considered within each topic. In the assessments it is unclear as to which options/topics were scored major negative due to cumulative effects and whether the rest were negligible/had no cumulative impacts. It would be helpful to clarify this.</p> <p>The approach to the assessment of cumulative effects is not well outlined and seems inconsistent between topics. For example, in Section 2 of the Regulation 18 (C) SA Report, SA Objectives 3 and 14 are the only Objectives that specifically mention cumulative effects in the assumptions and methodologies. In addition, there is no consideration of how each of the SA Objectives might interact with one another.</p>
Identifying appraisal objectives		<p>Covered in 2017 SA Scoping Report, Sections 3 and 5 of the 2018 Interim SA Report and Section 2 and Appendix A of the Regulation 18 (C) SA Report.</p> <p>Section 2.10-2.24 and Appendix A of the Regulation 18 (C) SA Report outlines the SA Objectives and Framework used to assess the alternatives. Figure 84 of the 2017 Scoping Report sets out the SA Framework which includes sustainability themes, objectives related to each theme that the GNLP should be trying to achieve, the decision making criteria for site allocations and general policies, as well as suggested indicators and targets. Section 5 of the 2018 Interim SA Report and Section 2 of the Regulation 18 (C) SA Report presents the methodology used for the assessment of reasonable alternatives.</p>
Consulting on the scope of the appraisal		<p>Covered in 2017 SA Scoping Report, 2018 Interim SA Report and Sections 1 and 2 of the Regulation 18 (C) SA Report.</p> <p>The introduction section of the 2017 SA Scoping Report sets out the purpose and objectives of the GNLP.</p> <p>Consultation on the scope of the SA has been undertaken with Historic England, Natural England, the Environment Agency and other relevant bodies.</p>
<b>B Developing and refining options and assessing effects</b>		
<p>Developing and refining the alternative options for the plan</p> <p>Paragraph: 018 Reference ID: 11-018-20140306</p>		<p>Covered in 2017 SA Scoping Report, Section 5 of the 2018 Interim SA Report and Sections 2, 3, 4 and Appendix A, B and C of the Regulation 18 (C) SA Report.</p> <p>Section 2.10-2.24 and Appendix A of the Regulation 18 (C) SA Report outlines the SA Objectives and Framework used to assess the alternatives. Figure 84 of the 2017 Scoping Report sets out the SA Framework which includes sustainability themes, objectives related to each theme that the GNLP should be trying to achieve, the decision making criteria for site allocations and general policies, as well as suggested indicators and targets. Section 5 of the 2018 Interim SA Report and Section 2 of the Regulation 18 (C) SA Report presents the methodology used for the assessment of reasonable alternatives.</p> <p>See detailed commentary within response to question 8. above.</p>
Predicting and evaluating the significant effects of the options and alternatives		<p>Covered in 2017 SA Scoping Report, Sections 7 and 8 of the 2018 Interim SA Report and Sections 2, 3, 4 and Appendix A, B and C of the Regulation 18 (C) SA Report.</p> <p>Appendix A of the 2018 Interim SA Report provides narrative as to the criteria used to score each option against each SA Objective.</p> <p>Section 3 'Site Assessments' of the Regulation 18 (C) SA Report and Appendix B provides an appraisal of each reasonable alternative site considered by the GNLP. Each appraisal includes a SA impact matrix which provides an indication of the nature and magnitude of impacts pre-mitigation.</p> <p>Section 4 'Policy Assessments' and Appendix C provides an assessment of the policies proposed in the GNLP. Each of the policies appraised have been assessed for their likely impacts on each SA Objective.</p> <p>See detailed commentary within response to question 8. above.</p>
Considering ways of mitigating adverse effects and maximising beneficial impacts		Covered in 2017 SA Scoping Report, Section 9 of the 2018 Interim SA Report and Chapter 3 of the Regulation 18 (C) SA Report.
<p>Proposing measures to monitor significant effects</p> <p>Paragraph: 025 Reference ID: 11-025-20140306</p>		Covered in 2017 SA Scoping Report, Section 10 of the 2018 Interim SA Report and Appendix A of the Regulation 18 (C) SA Report.
<b>C. Preparing the Sustainability Report - Including the SEA Requirements</b>		
		No major deficiencies. Some further explanation suggested to be remedied at the Regulation 19 Consultation, as set out above and in the accompanying report.
<b>D. Seek representations on the SA report from consultation bodies and the public</b>		

Paragraph: 020 Reference ID: 11-020-20140306		Covered in 2017 SA Scoping Report and each subsequent report.
<b>E. Post adoption reporting and monitoring</b>		
Paragraph: 025 Reference ID: 11-025-20140306	N/A	To be done after adoption of the Local Plan.

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**APPENDIX 2:**  
**SITE APPRAISAL NORTH EAST WYMONDHAM**

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**SITE APPRAISAL NORTH EAST WYMONDHAM**

Score	Description
--	Likely to result in a major negative effect.
-	Likely to result in a minor negative effect.
0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
+/-	It is entirely uncertain whether impacts would be positive or negative.
+	Likely to result in a minor positive effect.
++	Likely to result in a major positive effect.

SA Objective	Decision making criteria for site allocations and general polices	Score	Comments
<p>1. Air Quality and Noise</p> <p>Minimise air, noise and light pollution to improve wellbeing.</p>	<ul style="list-style-type: none"> <li>Will it have a significant impact on AQMAs in Norwich city central and Hoveton?</li> <li>Will it minimise impact on air quality?</li> <li>Will it minimise the impact of light and noise pollution?</li> </ul>	0	<p>The site is not located within an Air Quality Management Area (AQMA). The nearest AQMA is Central Norwich, which is located approximately 11.4km to the north east of the site and is declared an AQMA for Nitrogen dioxide (NO<sub>2</sub>).</p> <p>The proposed end use of the site is primarily for residential purposes and is in keeping with existing uses in the surrounding area. North East Wymondham has experienced recent growth over the last 10 years that extends built and committed development along Norwich Common and Tuttle's Lane towards Melton Road. The Site is located in an area that has been subject to a number of planning applications and appeals which has culminated in consent for approximately 1,700 residential dwellings forming an urban extension to Wymondham. The development is therefore not anticipated to cause significant impacts in relation to air quality, light and noise pollution, when compared to the existing site and surrounding uses.</p> <p>Air Quality and Noise ES chapters have been prepared and will be submitted with the planning application for development at the site.</p> <p>During the construction phase of the development, dust, emissions and noise would be generated in association with plant and vehicles. Dust, emissions and noise would be managed in accordance with standard best practice mitigation measures, implemented through a CEMP secured by a planning condition, in accordance with all relevant legislation, and is not anticipated to generate significant adverse effects.</p> <p>There would be emissions from vehicle exhausts and energy emissions associated with up to 650 new residential dwellings during the operation of the proposed development. The assessment indicates that pollutant levels at sensitive locations across the site were below the relevant air quality objectives and the location is considered suitable for residential use. The site is in close proximity to local facilities and public transport within Wymondham and Hethersett, reducing the need for car travel, including:</p> <ul style="list-style-type: none"> <li>Education facilities, healthcare, supermarkets, retail, restaurants, recreation and leisure facilities;</li> <li>Wymondham Rail Station is located approximately 2.5km to the south west of the site, with regular direct services to Norwich, Thetford, Cambridge and Ely. The station is served directly by bus route 14/14A, or can be reached on foot from Wymondham town centre within an average walking time of less than 10 minutes; and</li> <li>Bus services, with the nearest bus stops currently provided on Norwich Common (B1172), approximately 750m to the south east of the site, with services running to Norwich approximately every hour. Services also run from Tuttle's Lane East to the south of the site to Wymondham town centre approximately every 20 minutes.</li> </ul> <p>The development includes for new facilities comprising a local centre, land safeguarded for a 2-form entry primary school, land safeguarded for potential 6th form college provision, open space and will include pedestrian and cycling access and will encourage sustainable travel to and within the site, thereby further mitigating significant impacts on air quality.</p> <p>The noise assessment was based on the findings of an acoustic survey. The assessment shows that in the proposed dwelling locations, suitable internal sound levels would be achievable with windows closed and standard thermal double glazing. The location is considered suitable for residential use and no significant noise impacts are anticipated.</p> <p>All external lighting installations are to be designed in line with the Institution of Lighting Professionals (ILP) Guidance notes on reduction of obtrusive light.</p>

SA Objective	Decision making criteria for site allocations and general policies	Score	Comments
<p>2. Climate Change Mitigation and Adaptation (ref: SA2)</p> <p>Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change.</p>	<ul style="list-style-type: none"> <li>Will it minimise CO<sub>2</sub> emissions?</li> <li>Will it support decentralised and renewable energy generation?</li> <li>Will it minimise the risk of fluvial or surface water flooding?</li> </ul>	+	<p>The development will reduce the need to travel far as the site is well connected to local facilities, public transport and employment opportunities, within Wymondham and Hethersett. The site is strategically located close to Norwich, Thetford, Cambridge and Ely, all which are accessible along the public transport corridor. Elm Farm Business Park is located adjacent to the eastern extent of the site.</p> <p>In addition, the development includes for the provision of a local centre, land safeguarded for a 2-form entry primary school, land safeguarded for potential 6th form college provision, open space and will create and enhance pedestrian and cycling routes, to encourage more sustainable modes of transport. This will help to reduce carbon emissions which will have benefits for climate change mitigation and adaptation. The concept masterplan shows that the development will enhance the green infrastructure network through the provision of a country park, open space and landscaping, which will increase mitigation and adaptation/resilience to climate change.</p> <p>A Water Resources and Flood Risk ES chapter, supported by a FRA and Drainage Strategy have been prepared and will be submitted with the planning application. The FRA provides a review of desk-based information related to flood risk and drainage to determine the suitability of the site for development. The site is located fully within Flood Zone 1 (low risk). The Drainage Strategy will ensure surface water run-off and foul water drainage from the development are appropriately managed in a sustainable way now and into the future, including allowance for climate change. The onsite sewers are likely to be adopted by Anglian Water.</p> <p>The surface water drainage strategy is to discharge surface water runoff to ground via attenuation using Sustainable Drainage Systems (SuDS) to reduce flood risk. At this stage, primary features include ponds, to provide the required storage in suitable locations across the site and these could be designed to consider wider environmental net gains such as amenity value and ecological enhancement. This could include designing areas of permanent water, wetlands and reedbeds, varying the bank slopes of basins etc. The scheme will be future proofed so that it is resilient to an increase in extreme weather events associated with climate change and potential flooding.</p>
<p>3. Biodiversity, Geodiversity and Green Infrastructure (ref: SA3)</p> <p>Protect and enhance the area's biodiversity and geodiversity assets and expand the provision of green infrastructure.</p>	<ul style="list-style-type: none"> <li>Will it minimise impact on designated sites and important species and habitats?</li> <li>Could it provide opportunities for bio- or geo-diversity enhancement?</li> <li>Could it contribute to green infrastructure networks?</li> <li>Will it help minimise the impact on air quality at designated sites?</li> <li>Will it ensure that current ecological networks are not compromised and future improvements in habitat connectivity are not prejudiced?</li> </ul>	++	<p>The site primarily comprises undeveloped arable land. Boundary vegetation comprises a mixture of hedgerow, semi-natural woodland, coniferous and broadleaved plantation woodland. There are areas of grassland and trees along field boundaries. There is also a number of small ponds at various places along the site boundary. The eastern parcel of the site includes Kett's Oak, which is an ancient oak tree and is one of the 50 Great British Trees. The site presents good opportunities for enhancement and connectivity to surrounding sites.</p> <p>A Biodiversity ES chapter has been prepared for the site and will be submitted with the planning application. The chapter is based on the findings of a desk study, an Extended Phase 1 Habitat Survey (June 2019), and specific faunal surveys for bats, badger, breeding birds, Great Crested Newts and reptiles. The survey reports are included as appendices to the ES chapter.</p> <p>The site itself is not covered by any statutory designations. The following are located within 10km:</p> <ul style="list-style-type: none"> <li>Toll's Meadow, Wymondham Local Nature Reserve (LNR) is located approximately 2.2km to the southwest of the site;</li> <li>Lower Wood, Ashwellthorpe SSSI is located approximately 4.6km to the south of the site;</li> <li>Norfolk Valley Fens Special Area of Conservation (SAC) is located approximately 6.2km to the north west of the site; and</li> <li>River Wensum SAC is located approximately 8.2km to the north of the site.</li> </ul> <p>The potential for significant impacts on these receptors has been assessed within the ES Biodiversity chapter. The HRA of the draft GNLP has been reviewed. Although the plan does not specifically assess the development, it considers overall proposed growth within the region and is therefore relevant in terms of identifying likely adverse effects. The majority of designated ecologically sensitive sites are located a substantial distance from the site, effects are therefore unlikely. It is considered that the development will provide sufficient areas of public open space which will adequately mitigate for any potential recreational impacts.</p> <p>The following mitigation measures have been incorporated into the design of the development to ensure there are no significant impacts on protected species, habitats or sites:</p> <ul style="list-style-type: none"> <li>Construction safeguards to be secured under a CEMP (and European Protected Species licence in relation to Great Crested Newt);</li> <li>Detailed design of the built development's layout to retain key habitat areas, comprising the majority of mature trees, hedgerows and ponds (and avoid backing onto sensitive habitat areas);</li> <li>Provision of open space areas forming green infrastructure corridors through and around the built development areas;</li> <li>Creation of a large area of open space in the eastern parcel of the site forming a country park; and</li> <li>implementation of a SuDS scheme and lighting design, to be secured under future reserved matters applications for the detailed design of the Development.</li> </ul> <p>Such measures are considered to avoid or minimise any significant adverse effects resulting from the development. A range of enhancement measures have been identified to provide gains in biodiversity across the site, including habitat creation and enhancement and provision of new nesting and shelter opportunities for faunal species. It is considered that the development would result in an overall gain in the existing ecological interest supported by the site, with significant benefits anticipated in respect of habitats, bat species, birds, invertebrates, reptiles and Great Crested Newts. This will ensure compliance with national and local planning policy.</p>

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4. Landscape (ref: SA4)  Promote efficient use of land, while respecting the variety of landscape types in the area.	<ul style="list-style-type: none"> <li>Will it minimise impact on the landscape character of the area, including the setting of the Broads?</li> <li>Will it enable development of previously developed land?</li> <li>Will it make efficient use of land?</li> </ul>	0	<p>The site is not within or within proximity to an Area of Outstanding Natural Beauty (AONB).</p> <p>A Landscape and Views ES chapter has been prepared for the site and will be submitted with the planning application. The assessment concluded that although the land within the site would change in character, the key landscape features that contribute to the character of the surrounding landscape would be retained, maintaining a physical and visual enclosure of substantial vegetation which contains the potential visual effects of existing development from surrounding areas of countryside.</p> <p>The screening and context provided by existing features, would effectively limit the visual impact of the Development from surrounding areas.</p> <p>The impact of the development on the character of adjacent areas would be further minimised by any landscape strategy that is implemented as mitigation for the development to reinforce and enhance existing landscape features to that contain views and deliver a cohesive open space framework that reinforces the characteristic pattern of the wider Wymondham settled plateau.</p> <p>Furthermore, the Kett's Oak Common country Park would ensure that the gap between the settlements of Wymondham and Heathersett would remain in open in perpetuity and would secure a significant area for community use where the increased levels of publicly accessible greenspace would increase the opportunities for access to historic landscape elements as well as recreation. Overall, the landscape and visual assessment has identified a small number of significant effects but none of which would be considered unacceptable in landscape or visual terms.</p> <p>Whilst the site does not use previously developed land and instead involves the development of agricultural land, the concept masterplan shows that the site will make efficient use of land, as it will have a positive contribution to housing, local facilities and green infrastructure enhancements. The Site is located in an area that has been subject to a number of planning applications and appeals which has culminated in consent for approximately 1,700 residential dwellings forming an urban extension to Wymondham. This creation of a new community in a suitable and sustainable location makes efficient use of land.</p>
5. Housing (ref: SA5)  Ensure that everyone has good quality housing of the right size and tenure to meet their needs.	<ul style="list-style-type: none"> <li>Will it ensure delivery of housing to meet needs in appropriate locations?</li> <li>Will it deliver affordable housing and other tenures to meet needs?</li> <li>Will it ensure a variety in the size and design of dwellings, to meet a range of circumstances and needs?</li> </ul>	++	<p>The development will have a positive contribution to housing.</p> <p>The development will provide up to 650 residential units, of which 33% will be affordable and 67% will be market. The development will provide a mix of dwelling sizes, from 1-bed flats to 5-bed houses. The range of accommodation provided will meet a range of circumstances and needs in the community.</p> <p>The site is located within proximity of local facilities, public transport and employment opportunities within Wymondham and Hethersett. The site is strategically located close to Norwich, Thetford, Cambridge and Ely, all which are accessible along the public transport corridor. Elm Farm Business Park is located adjacent to the eastern extent of the site. The development will enhance connectivity to these.</p>
6. Population and Communities (ref: SA6)  Maintain and improve the quality of life of residents.	<ul style="list-style-type: none"> <li>Will it enhance existing, or provide new community facilities?</li> <li>Will promote integration with existing communities?</li> </ul>	++	<p>The site will create a network of new and enhanced pedestrian and cycling routes that permeate through the development site and connect to the wider surrounding area, which will improve accessibility to local facilities, improving the quality of life of residents.</p> <p>The development includes the provision of a local centre comprising a total of up to 1,950sqm of floorspace. Within the local centre, the development will provide up to 600sqm of a food store, up to 300sqm of supporting retail, up to 500sqm for a community hub and up to 550sqm for a health hub. The development will provide land safeguarded for a 2-form entry primary school and land safeguarded for 6th Form College provision. The development includes the provision of open green space, a Country Park and leisure facilities. These new facilities would not only be beneficial for new residents but also for the existing surrounding communities.</p> <p>The development presents the opportunity for better social connectivity with established communities in Wymondham and Hethersett, which is beneficial for the well-being of communities. The development will be designed to provide safe areas of public realm and open space which will create a place for residents and communities to mix. North East Wymondham has experienced recent growth over the last 10 years that extends built and committed development along Norwich Common and Tuttle's Lane towards Melton Road. The Site is located in an area that has been subject to a number of planning applications and appeals which has culminated in consent for approximately 1,700 residential dwellings forming an urban extension to Wymondham. This provides good opportunity for integration between communities.</p>
7. Deprivation (ref: SA7)  To reduce deprivation.	<ul style="list-style-type: none"> <li>Will it help to reduce deprivation?</li> </ul>	+	<p>According to the Index of Multiple Deprivation (IMD)<sup>8</sup>, the site is located in the Lower Super Output Areas (LSOA) (i.e. neighbourhoods) South Norfolk 007C, which is ranked 26,560 out of 32,844 LSOAs in England where 1 is the most deprived LSOA, and South Norfolk 005C which is ranked 23,562. This is amongst the 20-30% least deprived neighbourhoods in the country.</p> <p>As above, the development will provide a positive contribution to housing and will include a mix of dwelling sizes and tenures (including 33% affordable housing) which will help to reduce deprivation levels by meeting a range of needs and circumstances within the community and ensuring everyone has access to good quality housing. As outlined above, the development will improve access to local facilities, healthcare, public transport and employment opportunities for new and existing residents and this will help to reduce deprivation further.</p> <p>A Population and Human Health ES chapter has been prepared and will be submitted with the planning application.</p>

<sup>8</sup> Index of Multiple Deprivation, 2015, available at: <https://dclgapps.communities.gov.uk/imd/idmap.html>

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			<p>The assessment concluded that construction of the development is likely to produce employment for an average of 117 full time equivalent (FTE) workers per month, over a 96-month period, providing a temporary beneficial effect on employment. During operation, a permanent beneficial effect on employment was identified as a result of the between 48 and 60 net additional jobs created by the development's provision of retail, community and health facilities floorspace. The creation of this employment will help to reduce deprivation further.</p> <p>The health of people within the community is a contributing factor to levels of deprivation. The provision of new and enhanced pedestrian and cycling routes that permeate through the development site and connect to the wider surrounding area, new publicly accessible green open space, a Country Park and leisure and recreation opportunities will likely improve physical activity rates and mental wellbeing in the community, thereby reducing deprivation further.</p> <p>The quality of the surrounding environment is also a contributing factor to levels of deprivation. The development will be designed to provide attractive and safe areas of public realm and open space which will create a place for residents and communities to mix and help reduce deprivation further.</p>
<p>8. Health (ref: SA8)</p> <p>To promote access to health facilities and promote healthy lifestyles.</p>	<ul style="list-style-type: none"> <li>Will it maximise access to health services, taking into account the needs of an ageing population?</li> <li>Will it promote healthy lifestyles?</li> <li>Will it avoid impact on the quality and extent of existing assets, such as formal and informal footpaths?</li> </ul>	+	<p>The site will create a network of new and enhanced pedestrian and cycling routes that permeate through the development site and connect to the wider surrounding area, which will improve the accessibility to health care and will be suitable for all user groups (elderly, mobility impaired and use of walking frames/scooters, parents with pushchairs). Residents would be more likely to walk to facilities, improving physical activity rates and promoting healthy lifestyles.</p> <p>The site is in close proximity of Wymondham and Norwich, which comprise numerous healthcare facilities. There are also opportunities for recreational and physical activities located within the area surrounding the site, for example sports clubs, leisure centres and parks.</p> <p>A Population and Human Health ES chapter has been prepared and will be submitted with the planning application. The assessment identified that there is spare capacity within the existing five GP branches in the study area, sufficient to meet the needs of the 1,463 new residents. However, the development proposes a new local centre and Health Hub which is likely to provide a new GP surgery. The provision of a new GP surgery will more than meet the needs arising from the development and therefore it is considered to have a beneficial effect on access to health facilities. This would not only be beneficial for new residents but also for the existing surrounding communities.</p> <p>The provision of, and connection to, pedestrian and cycling routes, new publicly accessible green open space, a Country Park and leisure and recreation opportunities will likely improve physical activity rates and mental wellbeing in the community. Careful design will ensure noise is not significant for end users so that it does not impact on health and quality of life. Development generated traffic and operational noise would not be significant.</p>
<p>9. Crime (ref: SA9)</p> <p>To reduce crime and the fear of crime.</p>	<ul style="list-style-type: none"> <li>Will it help design out crime from new development?</li> </ul>	+	<p>The development will be designed to provide safe areas of public realm and open space which will create a place for residents and communities to mix. Pedestrian and cycling routes will run throughout the site to create safe modes of transport for non-motorised users. A lighting strategy will be prepared for the scheme and appropriate lighting will be implemented throughout the design, which will assist in reducing fear of crime and creating a safe built environment.</p>
<p>10. Education (ref: SA10)</p> <p>To improve skills and education.</p>	<ul style="list-style-type: none"> <li>Will it enable access to education and skills training?</li> </ul>	+	<p>The site is located within proximity of numerous education facilities in Wymondham, Hethersett and Norwich and will provide connectivity to these, enabling access to education and skills training.</p> <p>A Population and Human Health ES chapter has been prepared and will be submitted with the planning application. The assessment concluded that the forecast surplus provision of 362 primary school places in the Wymondham and Hethersett Primary Phase Planning Area at 2022/23 would more than meet the demand for primary school places arising from the Development (i.e. 167 pupils).</p> <p>In addition, the development includes for the provision of a local centre, land safeguarded for a 2-form entry primary school, land safeguarded for potential 6th form college provision. Therefore, it is considered that the development would have a positive effect on primary education.</p>
<p>11. Economy (ref: SA11)</p> <p>Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintain and enhance town centres.</p>	<ul style="list-style-type: none"> <li>Will it promote Greater Norwich as a regional economic centre?</li> <li>Will it promote employment land provision to support existing and future growth sectors?</li> <li>Will it promote a range of employment opportunities?</li> <li>Will it promote vibrant town centres?</li> <li>Will it promote the rural economy?</li> </ul>	++	<p>A Population and Human Health ES chapter has been prepared and will be submitted with the planning application. The assessment concluded that construction of the development is likely to produce employment for an average of 117 FTE workers per month, over a 96-month period, providing a temporary beneficial effect on employment. In terms of its operational phase, a permanent beneficial effect on employment is identified as a result of the between 48 and 60 net additional jobs created by the development's provision of retail, community and health facilities floorspace. A cumulative assessment of the development alongside other schemes for which a planning application has been submitted, has identified beneficial effects on local expenditure and employment.</p> <p>The design of the development will include improved connections to Elm Farm Business Park which is located adjacent to the eastern extent of the site and to Wymondham town centre to the south west of the site. This will encourage the growth of existing businesses here and will provide benefits in terms of custom from new residents, which will help to increase the vibrancy of Wymondham town centre. The continued growth of North East Wymondham due to its strategic location along the Cambridge Norwich Growth Corridor, as set out within the SHMA Core Area and the NPA identified within the JCS, will help to promote Greater Norwich as a regional economic centre.</p>
<p>12. Transport and Access to Services (ref: SA12)</p>	<ul style="list-style-type: none"> <li>Does it reduce the need to travel?</li> <li>Does it promote sustainable transport use?</li> </ul>	+	<p>The site is in close proximity of local facilities and public transport within Wymondham and Hethersett, reducing the need for car travel, including:</p>

SA Objective	Decision making criteria for site allocations and general policies	Score	Comments
<p>Reduce the need to travel and promote the use of sustainable transport modes.</p>	<ul style="list-style-type: none"> <li>Does it promote access to local services?</li> <li>Does it promote road safety?</li> <li>Does it promote strategic access to and within the area?</li> </ul>		<ul style="list-style-type: none"> <li>Education facilities, healthcare, supermarkets, retail, restaurants, recreation and leisure facilities;</li> <li>Wymondham Rail Station is located approximately 2.5km to the south west of the site, with regular direct services to Norwich, Thetford, Cambridge and Ely. The station is served directly by bus route 14/14A, or can be reached on foot from Wymondham town centre within an average walking time of less than 10 minutes; and</li> <li>Bus services, with the nearest bus stops currently provided on Norwich Common (B1172), approximately 750m to the south east of the site, with services running to Norwich approximately every hour. Services also run from Tuttlles Lane East to the south of the site to Wymondham town centre approximately every 20 minutes.</li> </ul> <p>There are established pedestrian and cycle links between the development and existing facilities in Wymondham. The development includes for new facilities comprising a local centre, land safeguarded for a 2-form entry primary school, land safeguarded for potential 6th form college provision, open space and will include pedestrian and cycling access and will encourage sustainable travel to and within the site.</p> <p>A Transport and Access ES chapter, informed by a Transport Assessment, has been prepared for the development and will be submitted with the planning application.</p> <p>The following mitigation will ensure there are no significant impacts on the highways network:</p> <ul style="list-style-type: none"> <li>Construction Method Statements (CMS) - prior to any construction activity on the site, a detailed CMS will be drawn up and agreed with the contractor and the Council to set out the appropriate site management practices to be adhered to;</li> <li>CEMP – standard best practice measure to manage impacts from construction traffic and ensure safety; and</li> <li>Travel Plan – will include measures to promote strategic access, reduce traffic generation and enable future residents, businesses and those using the development to access destinations beyond the site to travel using more sustainable transport modes.</li> </ul> <p>It expected that within mitigation in place, there will be no adverse impacts relating to public transport, cycle and pedestrian connectivity and highway safety.</p>
<p>13. Historic Environment (ref: SA13)</p> <p>Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment.</p>	<ul style="list-style-type: none"> <li>Does it enable the protection and enhancement of heritage assets, including their setting?</li> <li>Does it provide opportunities to reveal and conserve archaeological assets?</li> <li>Could it benefit heritage assets currently 'at risk'?</li> </ul>	0	<p>A Cultural Heritage ES chapter has been prepared for the site, supported by a Desk Based Assessment and a geophysical survey report. These reports will be submitted within the ES in support of the planning application.</p> <p>No designated heritage assets, (Scheduled Monuments, World Heritage Sites, Historic Battlefield Sites or Historic Wreck Sites) lie within or within the immediate vicinity of the site.</p> <p>The Moot Hill Scheduled Monument (Historic England ref.1003993) lies c.1.33km south of the site at its closest point and is separated from the site by intervening development. There is no visual, historical or functional association between the Scheduled Monument and the site.</p> <p>The desk-based assessment identified five built heritage receptors with the potential to be impacted by the development:</p> <ul style="list-style-type: none"> <li>Oakland Farmhouse (Grade II, NHLE ref. 1291979) is located c.100m north of the site;</li> <li>Manor Farmhouse (Grade II, NHLE ref. 1291979) is located c.650m north west of the site;</li> <li>A limestone milestone (Grade II, NHLE ref. 1169504) is located to the immediate south of the site;</li> <li>Wong Farmhouse (Grade II, NHLE ref. 1050772) is located c.645m north of the site at its closest point; and</li> <li>The Park Farm Hotel (Grade II, NHLE ref. 1169658) is located c.550m south east of the site.</li> </ul> <p>The Wymondham Conservation Area is separated from the site by extensive intervening development.</p> <p>Following the implementation of a CEMP in the construction phase, and landscaping strategy based on the principles of the concept masterplan for open space areas in the operational phase, the alteration of the setting of the built heritage receptors is not likely to adversely impact on their importance. Due to limited views and intervening built form between the site and the heritage assets, it is considered there will be no significant impacts on heritage assets as a result of the development.</p> <p>No features of likely archaeological interest have been identified within the site. The ES chapter concludes that following an agreed program of archaeological trenching prior to the construction phase, no adverse effects on archaeological receptors are identified as arising from the development.</p>
<p>14. Natural Resources, Waste and Contaminated Land (ref: SA14)</p> <p>Minimise waste generation, promote recycling and avoid the sterilisation of mineral resources. Remediate</p>	<ul style="list-style-type: none"> <li>Does it contribute to the minimisation of waste production and to recycling?</li> <li>Does it safeguard existing and planned mineral and waste operations?</li> <li>Will it help to remediate contaminated land?</li> </ul>	0	<p>The development is not anticipated to produce waste to the extent that the creation or disposal of which would give rise to significant adverse effects. No demolition is required. The CEMP would detail the mitigation measures to be implemented during the construction phase to minimise waste and ensure that it is stored, managed, collected, reused, recycled and disposed of appropriately. Operational waste would be disposed of in line with the Council's requirements and managed in accordance with all applicable legislation. The design of the development will include appropriate areas for refuse and recycling points.</p> <p>Part of the south of the site is located within Source Protection Zone 3. The site is primarily agricultural land, and therefore is not likely to be heavily contaminated. The operational development will be for residential development and is not associated with hazardous substances or toxic emissions to water or air. Any such materials would be stored and handled in accordance with relevant legislation.</p>

SA Objective	Decision making criteria for site allocations and general polices	Score	Comments
contaminated land and minimise the use of the best and most versatile agricultural land.	<ul style="list-style-type: none"> <li>Does it avoid loss of the best and most versatile agricultural land (grades 1-3a)?</li> <li>Will there be adequate provision for waste and recycling facilities?</li> </ul>		The Site is undifferentiated Grade 3 agricultural land. There would be no loss of the best quality, Grade 1 or 2 land as a result of the proposed development, therefore likely significant effects are not anticipated.
<p>15. Water (ref: SA15)</p> <p>Maintain and enhance water quality and ensure the most efficient use of water.</p>	<ul style="list-style-type: none"> <li>Will it maximise water efficiency?</li> <li>Will it minimise impact on water quality?</li> <li>Will it impact on water discharges that affect designated sites?</li> <li>Will it contribute to achieving the River Basin Management Plan actions and objectives?</li> </ul>	0	<p>A Water Resources and Flood Risk ES chapter, supported by an FRA and Drainage Strategy have been prepared for the site and will be submitted with the planning application.</p> <p>The assessment identified the following:</p> <ul style="list-style-type: none"> <li>The Site is located fully within Flood Zone 1 (the low risk zone). However, the EA's surface water flood map shows surface water flood outlines for the majority of internal ditches / field drains within the site;</li> <li>There are six groundwater abstraction boreholes within a 500m radius of the site. These are all for potable use associated with isolated farmhouses. There are no other surface water abstraction points marked on the records reviewed in the immediate vicinity of the site;</li> <li>A number of internal ditches / field drains are located within the site, draining the western parcel (flowing in a north-westerly direction towards the River Tiffey) and the eastern parcel (flowing in a north-easterly direction towards the River Yare). A number of these ditches within the western parcel of the Site also convey flows through the site from land to the east; and</li> <li>The site is underlain by superficial deposits which are classified as unproductive strata whilst the underlying chalk bedrock is classified as a Principal Aquifer, which is capable of supplying water at a strategic scale.</li> </ul> <p>Proposed measures included to mitigate the effects generated by the construction phase include the implementation of a suitably worded CEMP and the incorporation of suitably designed SuDS. Proposed measures to mitigate the effects generated by the operational phase of the development include the implementation of an appropriate drainage strategy and allowing for the appropriate provision of management and maintenance for all drainage infrastructure by individual property owners, site management and Anglian Water as appropriate.</p> <p>Following implementation, the mitigation measures outlined above will ensure that there are no significant adverse effects on the water environment during the construction and operational phases of the development.</p> <p>The site is primarily agricultural land, and therefore is not likely to be heavily contaminated. The operational development will be for residential development and is not associated with hazardous substances or toxic emissions to water. Any such materials would be stored and handled in accordance with relevant legislation, therefore minimising the potential for impacts on water quality.</p> <p>The Biodiversity chapter of the ES concludes that there would be no likely significant effects on designated sites as a result of water discharge from the site.</p>

## **APPENDIX 4**

**ANNUAL MONITORING REPORT 2018-19**



# Joint Core Strategy for Broadland, Norwich and South Norfolk:

## Annual Monitoring Report 2018-19

January 2020



Jobs, homes, prosperity for local people



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# 1. Executive Summary

- 1.1 This Annual Monitoring Report (AMR) assesses how the Greater Norwich area performed for 2018/19 against the objectives set out in the Joint Core Strategy.
- 1.2 There are many indicators that are currently being met or where clear improvements have been made:
- The number of Lower Super Output areas among the most deprived 20% nationally has been reduced from 17 to zero;
  - The number of LSOAs in the in the least deprived 50% of the country for access to housing and service has increased;
  - The number of housing completions reached its highest level in recent years, exceeding the JCS annual target;
  - The number of affordable housing completions has increased to its highest level in the last 5 years, exceeding the JCS annual target;
  - The proportion of the population aged 16-64 qualified to NVQ level 4 has increased year on year;
  - Norwich has maintained its 13th position in the national retail ranking;
  - No listed buildings have been lost or demolished;
  - CO2 emissions per capita have decreased.
- 1.3 However, there are several indicators where targets are not currently being met, some of which may have been adversely affected by the uncertain economic and political climate. Some indicators are perhaps less influenced by external factors and these are the areas where the overall focus of action should be placed:
- Although housing delivery has improved in recent years, the number of completions remain below target for the whole plan period;
  - Affordable housing completions are below target in both percentage and absolute terms overall;
  - The continued loss of office space in Norwich City Centre, and the growth of office space in other areas is noteworthy, continuing previous years' trends.
- 1.4 The underperforming economic indicators reflect wider economic conditions. However, there is a strong argument that the ambitious JCS targets for office and retail development reflect older business models and less efficient use of space.
- 1.5 Some "contextual indicators" in the AMR that the local plans are able to have more limited impact on show negative trends:

- Recycling rates have decreased;
- Total crime level has increased this year and
- The number of people killed or seriously injured in road traffic accidents has increased.

1.6 A 5-year land supply can be demonstrated for this monitoring year. Greater Norwich Authorities can demonstrate 5.89 years of housing supply.

1.7 A range of activities are underway that will have a positive impact on stimulating growth and help deliver against targets over the coming years.

1.8 The local planning authorities, working with the County Council and the Local Enterprise Partnership through the Greater Norwich Growth Board, progressed implementation of the Greater Norwich City Deal agreed with Government in 2013. Working together, the partners support the private sector to deliver in numerous ways, including:

- making a Local Infrastructure Fund available to developers to unlock site constraints;
- delivering the NDR and other transport measures, and working towards delivering the Long Stratton bypass and better public transport, including through “Transforming cities “ and
- engagement in skills initiatives to improve the match between labour supply and demand.

1.9 The Local Planning Authorities (LPAs) are reviewing and rolling forward the JCS to produce the Greater Norwich Local Plan (GNLP), scheduled to be adopted in 2022. The AMR will inform and be informed by this process.

## 2. Introduction

### Context

- 2.1. The Joint Core Strategy (JCS) for Broadland District Council, Norwich City Council and South Norfolk Council (excluding the Broads Authority area) sets out the long-term vision and objectives for the area and was adopted on 24 March 2011.
- 2.2. Following a legal challenge, parts of the JCS concerning the North-East Growth Triangle (NEGT) were remitted for further consideration including the preparation of a new Sustainability Appraisal (SA). The additional work demonstrated that the original policy approach remained the preferred option and this was submitted and examined during 2013. With some modifications, including new policies (Policies 21 and 22) to ensure an adequate supply of land for housing, the amendments to the JCS were adopted on 10 January 2014.
- 2.3. For more information on the adoption of the Joint Core Strategy please see the Greater Norwich Growth Board's website:  
[www.greaternorwichgrowth.org.uk/planning/joint-core-strategy/](http://www.greaternorwichgrowth.org.uk/planning/joint-core-strategy/)

### Purpose

- 2.4. The Annual Monitoring Report (AMR) measures the implementation of the JCS policies and outlines the five-year land supply position (Appendix A).
- 2.5. It also updates the SA baseline (Appendix D) and includes a section on the implementation of each local authority's policies (Appendices E and F) from their respective local plans (not covered by the JCS).
- 2.6. The Localism Act (2011) requires this report to include action taken under the Duty to Cooperate. This can be found in Appendix C.
- 2.7. Community Infrastructure Levy (CIL) regulations require this report to include details of CIL receipts received over the monitoring period. These details can be found in Appendix B.

### 3. Joint Core Strategy Monitoring

- 3.1 The spatial planning objectives in the JCS provide the framework to monitor the success of the plan. They are derived from the districts' Sustainable Community Strategies:
- To minimise the contributors to climate change and address its impact;
  - To allocate enough land for housing, and affordable housing, in the most sustainable settlements;
  - To promote economic growth and diversity and provide a wide range of jobs;
  - To promote regeneration and reduce deprivation;
  - To allow people to develop to their full potential by providing educational facilities to support the needs of a growing population;
  - To make sure people have ready access to services;
  - To enhance transport provision to meet the needs of existing and future populations while reducing travel need and impact;
  - To positively protect and enhance the individual character and culture of the area;
  - To protect, manage and enhance the natural, built and historic environment, including key landscapes, natural resources and areas of natural habitat or nature conservation value;
  - To be a place where people feel safe in their communities;
  - To encourage the development of healthy and active lifestyles;
  - To involve as many people as possible in new planning policy.
- 3.2 The sections that follow show how each of the objectives and indicators highlighted in the monitoring framework of the JCS have progressed since the 2008 base date of the plan. The current iteration of this report shows data from the last 5 years. For data from the earlier years, please see previous iterations of the report.
- 3.3 In some instances, relevant data will be released after the publication of this report and as such, some indicators do not have complete time-series information. In addition, information from across the area is not always consistent. Where this is the case the reasons for these inconsistencies are stated.
- 3.4 Some data is collected from sample surveys, such as the Annual Population Survey. Given the nature of sample surveys there can

be some fluctuation in results. Indicators which use the Annual Population Survey are employment and unemployment rates, occupational structure and highest-level qualifications.

- 3.5 Since the JCS monitoring framework was drawn up various datasets have been withdrawn or altered. Again, where this is the case reasons for incomplete data will be given and where possible proxies used instead.
- 3.6 To ensure the monitoring stays effective and relevant, a full review of the framework has been carried out. As a result, a number of indicators have been updated or revised from 2015/16 onwards.
- 3.7 Datasets for the indicators monitored are set out in detail in tables on the following pages.

This Annual Monitoring Report (AMR) is based upon the objectives and targets set out in the Joint Core Strategy (JCS) and covers the period between **1<sup>st</sup> April 2018 and 31<sup>st</sup> March 2019**.

**In addition to the objectives and targets in the JCS, Broadland, South Norfolk and Norwich have a number of indicators that they monitor locally. These can be found in the appendices.**

**As Norwich City Council did not produce an appendix for the monitoring of the local plan for the 2017-18 AMR, Appendix F contains monitoring information covering both 2017-18 and 2018-19 periods.**

**Objective 1: to minimise the contributors to climate change and address its impact**

The following table sets out indicators measured by the JCS monitoring framework

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status
Total CO2 emissions per capita	Decrease	DECC	Broadland	6.4	6.2	6.0	5.5	Data not released	
			Norwich	4.5	4.3	3.9	3.8		
			South Norfolk	6.7	6.6	6.3	6.2		
Total CO2 emissions per each sector	Decrease	DECC	See Table 3.8						
Sustainable and Renewable energy capacity permitted by type	Year-on-year megawatts capacity permitted increase	LPA	See Table 3.10						
Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality	Zero	LPA	Greater Norwich area	0	0	1	0	0	
			Broadland	0	0	0	0	0	
			Norwich	0	0	0	0	0	
			South Norfolk	0	0	1	0	0	
All new housing schemes to achieve water efficiency standard of 110L/Person/Day	All new housing schemes to achieve water efficiency of 110 LPD	LPA	Broadland Norwich South Norfolk	All housing developments have to show they will meet this standard therefore 100% compliance has been assumed as permission is not granted without this assurance.					
Percentage of household waste that is a) recycled and b) composted	No Reduction	LPA	Broadland	a) 25%	a)26%	a)24.88%	a)23.60%	a)21.45%	
				b) 22%	b)25%	b)26.02%	b)26.34%	b)26.79%	
			Norwich	a) 29%	a)32%	a)27%	a)24.86%	a)22.90%	
				b) 9%	b)7%	b)13%	b)12.7%	b)16.10%	
			South Norfolk	a) 42%	a)44	a)44	a) 42.34%	a) 22.15%	
				b) 18%	b)18	b)19	b) 18.4%	b) 19.20%	



### Total CO<sub>2</sub> emissions per capita for each sector

Location	Sector	14/15	15/16	16/17	17/18	RAG status
Broadland	Ind & Com	2.6	2.5	2.4	2.0	Green
	Domestic	1.8	1.8	1.7	1.6	
	Transport	1.9	1.9	1.9	2.0	Red
Norwich	Ind & Com	2.0	1.8	1.6	1.5	Green
	Domestic	1.5	1.4	1.4	1.3	
	Transport	1.0	1.0	1.0	1.0	Yellow
South Norfolk	Ind & Com	2.0	2.8	1.6	1.5	Green
	Domestic	1.9	1.7	1.7	1.5	
	Transport	3.1	3.2	3.1	3.3	Red

3.8 CO<sub>2</sub> emissions per capita decreased in each of the local authority areas in the Greater Norwich between 2017 and 2018, the latest year in which figures are available.

3.9 CO<sub>2</sub> emissions per capita across the industrial and commercial and domestic sectors in the Greater Norwich area decreased between 2017 and 2018, while the transport sector increased slightly for Broadland and South Norfolk.

### Sustainable and Renewable energy capacity permitted by type

Location	Type	14/15	15/16	16/17	17/18	18/19
Broadland	TOTAL	13.36MW	13.94MW	17.5kW	8.67MW	0.78MW
	Wind	0.01MW	0MW	0MW	0 MW	0MW
	Solar PV	10.17MW	11.14MW	2.5kW	8.67 MW	0.64MW
	Hydro	0MW	0MW	0MW	0 MW	0MW
	Biomass	3.18MW	2.8MW	15kW	0 MW	0.14MW
Norwich		No schemes submitted	Solar PV 355.03 kW (0.36MW) (six schemes)	Solar PV 1.9MW (1750mW per year)	No schemes submitted	No schemes submitted
South Norfolk	TOTAL	8.0MW	39.45MW	0MW	17MW	0MW
	Wind	0MW	0MW	0MW	0MW	0MW
	Solar PV	7.5MW	37MW	0MW	17MW	0MW
	Sewerage	0MW	0MW	0MW	0MW	0MW
	Biomass	0.5MW	2.45MW	2.0MW	0MW	0MW
	Air	0MW	0MW	0MW	0MW	0MW

3.10 In many cases micro-generation of renewable energy on existing buildings does not require planning permission, therefore, precise

information on the amount of renewable energy capacity is not systematically recorded or available.

- 3.11 Solar energy capacity approvals have decreased from 2015/16, although results have fluctuated considerably over the plan period so far. Permitted development rights have been extended to allow a wide range of renewable energy schemes (especially solar panels) to be installed without requiring planning permission, therefore, this indicator can only now capture a sample of larger schemes. Results are thus made up of relatively few sites and therefore might be expected to fluctuate somewhat from one year to the next, making it difficult to assess this indicator with certainty. Additionally, funding for solar energy projects has diminished in recent years, leading to reduced take-up and impetus to bring schemes forward.

**Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.**

- 3.12 No planning permission has been granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality this year.

**Water efficiency**

- 3.13 All new housing is required to meet the optional higher Building Regulations water efficiency requirement of 110 Litres per person per day and other development is required to maximise water efficiency.
- 3.14 All developments of 10+ dwellings have to show they will meet this standard. Therefore 100% compliance is assumed as permission will not be granted without this assurance.
- 3.15 The government's national housing standards review means the part of the adopted JCS policy 3 which encouraged a design-led approach to water efficiency on large scale sites can no longer be applied. This is because there is no equivalent new national standard as demanding as the requirement set in the JCS.
- 3.16 The remainder of the policy can and is still being applied. The optional water efficiency standard set out in Building Regulations is directly equivalent to the JCS policy 3 for housing developments of less than 500 dwellings. This level of water efficiency can be easily achieved at very little extra cost through water efficient fixtures and fittings.
- 3.17 Non-housing development is unaffected by these changes and

must continue to show how it will maximise water efficiency. An advice note provides information to enable this standard to be implemented through JCS policy 3.

**Percentage of household waste that is a) recycled and b) composted**

- 3.18 The percentage of household waste that is recycled has decreased across all three districts, most notably in South Norfolk. This is mainly due to the amount of dry recycling that has been sent for recycling. The market dictates a higher quality of recycling. This has resulted in the rejection rate of material increasing as lower quality material is not being sent for recycling. In contrast, the rate of composting has increased across all districts.
- 3.19 Increasing recycling rates remains difficult as the amount of newspapers and magazines continues to decline with people switching to digital means and recyclable items being increasingly made using less material (the effect known as “light weighting”). Norfolk County Council is working with all other Norfolk councils to improve services and increase the amount of waste diverted from landfill.

**Objective 2: to allocate enough land for housing, and affordable housing, in the most sustainable settlements**

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status
Net housing completions	NPA – 1,825 per annum Greater Norwich area – 2,046 pa Broadland NPA – 617 pa Broadland RPA – 89 pa Norwich – 477 pa South Norfolk NPA – 731 South Norfolk RPA – 132	LPA	NPA	1,140	1,164	1,810	1,685	2,440	
			Greater Norwich area	1,681	1,728	2,251	2,034	2,779	
			Broadland - NPA	217	340	410	449	482	
			Broadland - RPA	188	258	234	230	158	
			Norwich	249	365	445	237	927	
			South Norfolk - NPA	674	459	955	999	973	
			South Norfolk - RPA	353	306	207	119	239	
Affordable housing completions	Affordable housing target of 525 per year <sup>1</sup>	LPA	Greater Norwich area	243 14%	222	456	531	724	
			Broadland	98 24%	107	237	177	195	
			Norwich	50 20%	25	44	56	137	
			South Norfolk	95 9%	90	175	298	392	
(Gross)New house completions by bedroom number, based on the proportions set out in the most recent Sub-Regional Housing Market Assessment	New Target 1 bedroom – 7% 2 bedrooms – 23% 3 bedrooms – 52% 4+ bedrooms – 18%	LPA		See table 3.32					
Provision of Gypsy and Traveller pitches to meet local plan requirements	To meet CHANA (Option 1) targets:29 pitches in total (15 from 2017-22, further 14 to 2022-27)	LPA	Greater Norwich area	3	4	4	0	0	
			Broadland	1	1	4	0	0	
			Norwich	0	0	0	0	0	
			South Norfolk	2	3	0	0	0	
Accessibility to market towns and key centres of employment during the morning peak (0700-1000), returning in the afternoon peak (1600-1900)	No decrease	Norfolk County Council	Greater Norwich area	94.6%	92.5%	58.7%	67.3%	63.8%	

<sup>1</sup> The Central Norfolk SHMA, 2017, identified a need of 11,030 affordable homes for the period 2015 to 2036

### **Net housing completions**

- 3.20 Housing delivery in 2018/19 has increased significantly (39%) from the previous year and in doing so has reached its highest levels since the adoption of the plan. The Joint Core Strategy (JCS) annual housing requirement target has been met for the second time in three years. The improvement in delivery is mainly due to an increase in housing delivery in Norwich. Housing delivery in the Norwich Policy Area (NPA) part of South Norfolk has maintained its generally high level. Housing delivery rates in the NPA part of Broadland have continued to rise but remain below the target established by the JCS. The rates of delivery in the rural areas of Broadland and South Norfolk remain significantly above the JCS target levels. The minimum JCS housing requirement for the rural areas of Broadland and South Norfolk was exceeded within the monitoring year, 7 years before the end of the plan period.
- 3.21 Despite these recent successes and the strength of delivery in the rural areas, housing delivery overall has fallen 4,255 homes below the JCS target since the start of the plan period in 2008/9. This under delivery has been the result of housing shortfalls in the NPA, which total 6,076 homes since 2008/9. These shortfalls have been particularly acute in the Broadland part of the NPA. The net effect of these shortfalls is that the annual rate of delivery needed to meet the JCS NPA target by 2026 has grown from 1,825 homes per year in 2008 to 2,693 homes per year as of 1 April 2019. At the Greater Norwich level, the impact of this increase is mitigated to some extent by the over-supply that is occurring in the rural areas. Nonetheless, it remains a significant challenge to achieve and sustain a level of delivery that would enable the JCS housing target to be met by 2026
- 3.22 It is noteworthy that housing completions monitored under the JCS do not take account of student accommodation that has been delivered. Norwich City has recently enjoyed considerable growth in the delivery of student accommodation. 250 student bed spaces (equivalent to 100 residential units) have been delivered in 2018/19. This level of delivery reflects an increased market demand for this type of accommodation in the City Centre. In addition, a further 58 units were delivered in the Norwich City area as separate communal dwellings. If the delivery of student and communal accommodation are taken into account overall delivery in Greater Norwich would increase to 2,937.
- 3.23 The housing delivery shortfall in the NPA is the result of a number of factors including: the JCS NPA target being significantly above the targets adopted in previous Local Plans; delays to the

allocation of sites for development as a consequence of the JCS legal challenge; and, the prolonged downturn in the property market since 2008, which had a substantial impact on housing delivery in the early part of the plan period. The impact of these factors was intensified due to the JCS's dependence on a large, strategic scale, growth, in particular the Broadland Growth Triangle and the challenge presented by the redevelopment of complex brownfield sites in the urban area.

- 3.24 Despite these challenges, the Greater Norwich Councils' have now delivered a commitment (the sum of planning permissions and site allocations) of 33,270. This is significantly (236%) higher than the commitment of only 14,090 that existed at the start of the JCS period in 2008. This substantial housing commitment sets the foundation for long term sustained and sustainable growth across Greater Norwich. It remains critical that the development of planned sites is achieved if the Councils' are to deliver high quality growth that is consistent with the Greater Norwich City Deal and helps ensure that the area fulfils its economic potential.
- 3.25 The Greater Norwich area Housing Land Supply Assessment 1 April 2019 sets out the 5 Year Housing Land Supply (5YR HLS) position for Greater Norwich. With the JCS becoming 5 years old on 10th January 2019, the 5YR HLS calculation is now calculated using the outcomes of the Housing Delivery Test (HDT) and standard methodology for the calculation of Local Housing Need (LHN) as opposed to the Housing Requirement of the JCS. As the 5YR HLS at Appendix A demonstrates, the authorities are now able to demonstrate a housing land supply that is in excess of 5 years using this methodology.

#### **Affordable housing completions**

- 3.26 Affordable housing completions have exceeded the current target of 561 completions per year. This marks the highest level of delivery in the last 7 years and is the first time the annual target has been achieved. This level of delivery is clearly linked to the significant increase in overall housing delivery across the Greater Norwich area. Continuing to meet the delivery target for affordable homes will remain a challenge however. This challenge has been made more difficult by government changes to the planning system which mean that affordable housing cannot be required in certain circumstances e.g. due to the vacant building credit or the prior approval of office conversions (measures which have a particularly significant impact in Norwich City). Another challenge to the delivery of affordable housing is that it has proved necessary to reduce the level of affordable housing secured on some sites to ensure that development is

viable. The authorities continue to scrutinise viability assessments submitted by developers to ensure that development meets the affordable housing target as far as possible. In addition, a number of section 106 agreements that accompany development include a “claw back” provision which may mean that additional affordable housing will be delivered at a later date if viability improves.

### **Provision of Gypsy and Traveler pitches**

- 3.27 Additional sites for Gypsy and Traveler pitches will be delivered through the grant of further planning permissions or through the GNLP in emerging local plans, as appropriate. Broadland Housing Association has secured planning permission for the delivery of 13 pitches at Swanton Road. The project has been delayed due to a legal challenge over ownership of the land, but it is anticipated that work will commence to deliver this project within this financial year alongside a revised application to Homes England for funding.
- 3.28 Looking to the future, a Caravan and Houseboats Accommodation Needs Assessment was completed in 2017 for the period to 2036 (commissioned jointly by the Greater Norwich authorities with the Broads Authority; Great Yarmouth Borough Council; and North Norfolk District Council). The Needs Assessment categorised the need for residential caravans, Travelling Showpeople and residential boat dwellers.
- 3.29 The need for residential caravans was studied specifically for those of Gypsy and Traveler heritage. A distinction was also drawn between Gypsy and Traveler households who have not ceased to travel permanently (Option 1) and those who only travel for work purposes (Option 2).
- 3.30 The Needs Assessment was completed in October 2017 and assesses the needs for the period 2017-2036. The study concluded the most appropriate geography for assessing the need for the three Greater Norwich authorities was across the whole of the three districts together (as a single figure).

	2017-2022	2022-2027	2027-2032	2032-2036	Total
Gypsies and Travellers (Option 1)	15	14	15	16	60
Gypsies and Travellers (Option 2)	-2	11	11	11	31
Travelling Showpeople	25	6	7	8	46
Residential boat dwellers	0	0	0	0	0
Residential caravan dwellers	91	5	5	5	106

- 3.31 There is no requirement for LPAs to demonstrate a five-year supply of sites for Travelling Showpeople, residential boat dwellers or residential caravan dwellers. There is, however, a requirement to demonstrate a five-year supply of pitches for Gypsies and Travelers (paragraph 10a of Planning Policy for Traveller Sites). The expectation is for an ongoing requirement for Gypsy and Traveler pitches to be met through a combination of “windfall” sites and allocated pitches in the GNLP.

**Accessibility to market towns and key centres of employment during the morning peak (0700-1000), returning in the afternoon peak (1600-1900)**

- 3.32 This indicator has shown a slight reduction in accessibility during this monitoring year. Buses times are run on a winter month timetable where there is a more limited service.

**(Gross) new house completions by bedroom number, based on the proportions set out in the most recent Sub-Regional Housing Market Assessment**

- 3.33 Since we do not have data for Norwich, it is not clear whether this indicator has achieved its target this year (see objective 2).



Location		14/15	15/16	16/17	17/18	18/19
Broadland <sup>2</sup>	1 bed	50	26	57	27	69
	2 bed	115	133	146	205	187
	3 bed	174	221	217	234	198
	4 bed	112	241	233	228	195
	Unknown	3	0	0	0	0
Norwich <sup>43</sup>		No data collected	No data collected	No data collected	No data collected	No data collected
South Norfolk	1 bed	56	70	94	121	98
	2 bed	257	173	251	230	266
	3 bed	461	263	435	396	483
	4 bed	240	248	375	335	310
	Unknown	13	11	7	36	71

*No comparable data for the Greater Norwich Area due to the lack of data from Norwich.*

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<sup>2</sup> Gross completions

<sup>3</sup> Includes conversions, data updated from Aug 2015 information from Norwich City Council and different from previous years

**Objective 3: to promote economic growth and diversity and provide a wide range of jobs**

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status				
Permitted amount of floorspace and land by employment type	B1 – 118 hectares/ 295,000m2 B2/8 – 111 hectares 2007 – 2026	LPA	Greater Norwich area Broadland Norwich South Norfolk	See table 3.34									
Amount of permitted floor space	100,000m <sup>2</sup> Norwich City Centre 100,000m <sup>2</sup> NRP 50,000m <sup>2</sup> BBP	LPA	Norwich	-29122m2	-7774m2	-24370 m2	-40205m2	-13961 m2					
			NRP	1797m2	1512m2	0m2	No data	No data					
			BBP	0	No data	No data	No data	No data					
			Elsewhere	S. Norfolk - 78m2	S. Norfolk - 1288m2	S. Norfolk - 443m2	S. Norfolk - 7465.70 M2	No data					
Annual count of employee jobs by BRES across Plan area	2222 per annum increase	ABI/BRES (Nomis)	Greater Norwich area	177,100	182,000	187,000	193,000	Data not yet released					
			Broadland	43,700	45,000	46,000	47,000						
			Norwich	85,300	87,000	90,000	93,000						
			South Norfolk	48,100	50,000	51,000	53,000						
Employment rate of economically active population	Increase	Annual Population Survey (Nomis)	Greater Norwich area	72.90%	79.20%	80.50%	75.40%	78.90%					
			Broadland	78.10%	80.90%	80.50%	84.30%	78.50%					
			Norwich	69.10%	77.10%	78.30%	68.50%	77.10%					
			South Norfolk	72.40%	80.30%	83.20%	75.60%	81.60%					
Percentage of workforce employed in higher occupations	Annual increase of 1%		Greater Norwich area	41%	41%	43%	50%	44%					
			Broadland	36%	43%	50%	41%	47%					
			Norwich	44%	37%	37%	51%	39%					
			South Norfolk	46%	44%	45%	60%	47%					
National retail ranking	Maintain top 20 ranking	Venuescore	Norwich	13th	13th	13th	13th	13th					
Net change in retail floorspace in city centre	No decrease in retail floor space	LPA	Norwich	-859	+225 sqm	No data	-217	-6231					
Percentage of permitted town centre uses in defined centres and strategic growth locations	100%	LPA	Broadland	A1	0%	A1	18.18%	A1	23%	A1	42%	A1	17.6%
				A2	0%	A2	0%	A2	100%	A2	100%	A2	100%
				B1a	15%	B1a	19.04	B1a	28%	B1a	20%	B1a	38.5%
				D2	13%	D2	0%	D2	15%	D2	33%	D2	17.3%
			Norwich	No data	A1	28.1%	A1	38.9%	A1	6%	A1	0%	
					A2	100%	A2	43.1%	A2	100%	A2	0%	
					B1a	100%	B1a	0%	B1a	0%	B1a	31%	
					D2	73.1%	D2	0%	D2	3%	D2	76%	
			South Norfolk	A1	62.5%	A1	100%	A1	21.7%	A1	70%	A1	38%
				A2	50%	A2	100%	A2	25%	A2	0%	A2	50%
				B1a	41%	B1a	73.1%	B1a	50%	B1a	75%	B1a	25%
				D2	0%	D2	55.6%	D2	66.7%	D2	71%	D2	0%

### Permitted amount of floor space and land by employment type<sup>4</sup>

3.34 In recent years, it has only been practical to collect data on planning permissions granted. Consequently, as the data presented here is incomplete, it is not clear whether we have achieved our target. What is clear is that while the permitted amount of employment space has increased overall over the last 3 years, there has been a sustained loss of office floor space in the city centre itself.

	Use Class	14/15	15/16	16/17	17/18	18/19	RAG Status	
Greater Norwich area (floorspace in sqm)	B1	-30,694	+26,617	+34,284	+41,259	No data		
	B2	+724	+2,035	+2,453	+3,722	No data		
	B8	+819	+13,194	+20,781	+10,338	No data		
Greater Norwich area (hectares)	B1	-12.2	+10.6	+13.7	+16.5	No data		
	B2	+0.2	+0.5	+0.6	+0.9	No data		
	B8	+0.5	+8.8	+13.9	+6.9	No data		
	B2/B8	+0.7	+9.3	+14.5	+8.8	No data		
Broadland (sqm)	B1	+2,861	+28,923	+53,451	+80,109	+82,532		
	B2	+2,389	+1,364	+6,197	+8,566	+8,060		
	B8	+552	+105	+376	+17,531	+15,583		
Norwich (sqm) <sup>5</sup>	B1							
	B1a	+31,063	-8,881	-24,449	-40,205	-11,695		
	B1b	+785	0	0	+113.8	0		
	B1c	+3,940	-8,562	-1,119	-217.7	+145.4		
	B2	-3,051	+1,498	-5,003	-8068	-280		
	B8	-214	-1,968	3,254	-7,633	-2,131		
South Norfolk	B1	2,233	15,157	+7,401	+1,459	No data		
	B2	1,386	-827	+1,259	+3,224	No data		
	B8	481	15,057	17,151	+440	No data		

+ = net gain

- = net loss

<sup>4</sup> Calculated using figures from the Greater Norwich Employment Growth and Employment Sites and Premises Study 2008

<sup>5</sup> Data updated from 2015 information from Norwich City Council and different from previous years

### Office space developed

- 3.35 There was a net loss of 11,695 sqm of office floor space (use class B1a) in Norwich this monitoring year, predominantly in the city centre. Loss includes change of use of long-term empty offices at St Mary's Works. There is currently very limited commercial impetus to develop any new office space in the city centre due to relatively low rental values making speculative development unviable.
- 3.36 Most of the office floor space losses are being developed into residential properties and schools. There remains no planning control over the loss of office space when converted to these uses.
- 3.37 Data published by the Valuation Office Agency (VOA) (Business Floorspace (Experimental Statistics VOA, May 2012) shows that the office stock in the Norwich local authority area stood at 362,000sqm in 2006 and that this had grown to 378,000sqm in 2012. The office floorspace total is likely to include a proportion of floorspace which for planning purposes is actually in use class A2 – financial and professional services, or D1 – for example, offices associated with police stations and surgeries, rather than just B1(a). However, in the absence of any more accurate and up to date national or local datasets, the VOA figure of 378,000sqm is used as a baseline Norwich stock figure for 2012.
- 3.38 Annual monitoring since the base date of the JCS (April 2008) shows the following change in the stock of B1(a) office floorspace in Norwich from 2008 to 2019, derived from planning permissions and completions records. From 2008 to 2019, the overall net reduction in the office floor space equates to around 29%. There is no indication that there will be any slowdown in this trend so long as residential development values in the city centre remain higher than office values and the absence of any additional planning obligation requirements on developers.

Date	Norwich Office Floor Space Variances
2008/09	13,205sqm net gain
2009/10	657sqm net gain
2010/11	2,404sqm net gain
2011/12	-115sqm net loss
2012/13	-3187sqm net loss
2013/14	-2024sqm net loss
2014/15	-31063 sqm net loss
2015/16	-8881 sqm net loss
2016/17	-24449 sqm net loss

2017/18	-40205 sqm
2018/19	-11695 sqm
Total actual/potential office floorspace change Norwich city April 2008-March 2019	<b>-105,353 sq. m net loss (-29.0%)</b>

### **Annual count of employee jobs<sup>6</sup>**

3.39 No data has been released for this year.

### **Employment rate of the economically active population**

3.40 Employment rates have increased over the past year. However, it is important to note that this dataset is based on sample surveys and fluctuates between surveys.

### **Percentage of the workforce employed in higher occupations**

3.41 The percentage of the workforce employed in higher occupations across the Greater Norwich area has decreased in this monitoring year.

### **National Retail Ranking for Norwich**

3.42 There were changes to the Venuescore evaluation criteria between 2011/12 and 2012/13 which affected Norwich's position resulting in a fall to the position of 13<sup>th</sup> from 9<sup>th</sup>. This year, the target for the city centre has been achieved by maintaining 13<sup>th</sup> position.

3.43 Overall, Norwich continues to compete well against larger cities in the Venuescore ranking nationally. It has the largest proportion of its retailing in the city centre of any major city nationally and is the only centre in the East of England that ranks in the top twenty.

### **Net change in retail floor space in the city centre**

3.44 Loss of retail floor space (of 6,231 sqm) has been identified from Norwich's retail monitor. This decrease is greater than the last 10 years combined. This significant reduction can be largely contributed to the diversification of the recently rebranded Castle Quarter where there has been the opening of a number of leisure uses which now occupy some of the larger units which were previously retail.

3.45 In recent years, retail investment in the city centre has

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<sup>6</sup> Data gathered in September. Although this dataset is not recommended for monitoring purposes it is nonetheless the only dataset available for measuring jobs at lower level geographies.

concentrated on improvements and enhancements to existing stock, for example the refurbishment of Castle Quarter, the emerging new proposals for Anglia Square, and the extension of Primark.

### **Previous Years**

- 3.46 The trend evident since April 2008 is for a continued slow reduction in retail floor space at the expense of other uses. Changes in policy have allowed more flexibility of uses in the city centre to encourage the development of uses such as cafes and restaurants. These complementary uses support retail strength and the early evening economy. In addition, ongoing planning deregulation at a national level has extended the scope of permitted development rights.
- 3.47 These have introduced more flexibility in the use of retail and commercial floor space; in many cases allowing former shops to change their use without the need for planning permission.
- 3.48 Although a reduction in retail floor space runs counter to the aim of Policy 11 of the JCS to increase the amount of retailing in the city centre, it is in support of the aim to increase other uses such as the early evening economy, employment and cultural and visitor functions. Such diversification of uses has helped strengthen the city centre's function in times of increased internet shopping.

### **Percentage of completed town centre uses in defined centres and strategic growth locations**

- 3.49 Proportions vary depending on use class and location. In Broadland, the use of Financial and professional services (A2) has achieved the set target of 100%, however, overall targets for town centre uses have not been met.

### Objective 4: to promote regeneration and reduce deprivation

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status
Number of Lower Super Output Areas in national most deprived 20%	Reduction by 50% in plan period (28 out of 242 in 2007)	IMD (DCLG)	Greater Norwich area	17	No data	No data	No data	0	
			Broadland	0				0	
			Norwich	17				0	
			South Norfolk	0				0	
The amount of land on brown field register that has been developed	Increase the amount of completions for housing on land identified in brown field register in % form	LPA	Broadland			No data	No data	2.19 ha (2.1%)	
			Norwich			No data	No data	1.34 ha	
			South Norfolk			No data	No data	5.05 Ha (22%)	

#### Number of Lower Super Output Areas in national most deprived 20%

- 3.50 The Index of Multiple Deprivation allows each Lower Super Output Area (LSOA) in England to be ranked relative to one another according to their level of deprivation. It must be noted that just because the rank of deprivation has improved it does not mean that deprivation itself has improved in any given area, but rather that deprivation has decreased relative to other parts of the country. The 2019 Index of Multiple Deprivation data shows the number of Lower Super Output Areas in the Greater Norwich area has reduced from 17 to 0, achieving and exceeding the set target.

#### The amount of land on the brownfield register that has been developed

- 3.51 This is a new indicator and further data will need to be collected over the years to track the development of this indicator. It is also important to note that since the size of the brownfield register changes every year, the percentage of completions is not necessarily an accurate account of the progress of development.

**Objective 5: to allow people to develop to their full potential by providing educational facilities to meet the needs of existing and future populations**

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status
School leaver qualifications - % of school leavers with 5 or more GCSEs at A* to C grades including Maths and English	Year-on-year increase from 2007 value of 53%	Norfolk County Council	Greater Norwich area	57.14%	65%	No data	Data discontinued	Data discontinued	Green
			Broadland	59.41%	68.80%				
			Norwich	45.52%	54.30%				
			South Norfolk	64.47%	69.30%				
16 to 18-year olds who are not in education, employment or training	Year-on-year reduction from 2006 value of 6%	Norfolk County Council	Greater Norwich area	5.10%	5.30%	3.40%	No data	No data	Grey
			Broadland	3.60%	3.50%	2.30%	No data	2.73%	Red
			Norwich	9.50%	8.20%	6.10%	No data	5.88%	Green
			South Norfolk	2.80%	2.80%	2.20%	No data	2.00%	Green
Proportion of population aged 16-64 qualified to NVQ level 4 or higher	Annual increase	Annual Population Survey	Greater Norwich area	33.80%	34.20%	36.80%	37.10%	38.40%	Green
			Broadland	29.30%	31.40%	28.60%	30.50%	39.70%	
			Norwich	35.90%	39.30%	38.80%	36.80%	38.50%	
			South Norfolk	35.70%	30.80%	42.00%	43.70%	36.90%	



**School leaver qualifications - % of school leavers with 5 or more GCSEs at A\* to C grades including Maths and English**

- 3.52 The Government has changed its GCSE grading system from A\* to G to 9 to 1 in 2017. An accurate direct comparison cannot be made with the previous grading system.

**16 to 18-year olds who are not in education, employment or training**

- 3.53 The proportion of 16 to 18-year olds not in education, employment and training has decreased in Norwich and South Norfolk.

**Proportion of population aged 16-64 qualified to NVQ level 4 or higher**

- 3.54 The proportion of the population aged 16-64 qualified to at least NVQ level 4 increased in the Greater Norwich area as a whole over the monitoring year, though there was a slight decline in South Norfolk.

## Objective 6: to make sure people have ready access to services

Indicator	Target	Source	Location	14/15	15/18	18/19	RAG status
IMD access to service	Increase the number of LSOAs in the least deprived 50% on the IMD for access to housing and service	IMD	Greater Norwich	127	No data	138	Green
			Broadland	40		41	Green
			Norwich	58		70	Green
			South Norfolk	29		27	Red

### Index of Multiple Deprivation access to services

- 3.55 The 2018-2019 data release shows the number of LSOAs in the least deprived 50% for access to housing and services has increased. Norwich has experienced the greatest level of improvements. It must be noted that just because the rank of deprivation has improved it does not mean that deprivation itself has improved in any given area, but rather that deprivation has decreased relative to other parts of the country.

**Objective 7: to enhance transport provision to meet the needs of existing and future populations while reducing the need to travel**

Indicator	Target	Source	Location	2001	2011	RAG status
Percentage of residents who travel to work:	Decrease in a), increase in b), c) and d)	Census (taken every 10 years)	Greater Norwich	a) 64% b) 8% c) 17% d) 9%	a) 67% b) 7% c) 18% d) 6%	Red
a) By private motor vehicles			Broadland	a) 70% b) 8% c) 9% d) 10%	a) 75% b) 6% c) 10% d) 6%	
b) by public transport			Norwich	a) 50% b) 9% c) 32% d) 7%	a) 52% b) 9% c) 33% d) 4%	
c) By foot or cycle			South Norfolk	a) 71% b) 5% c) 10% d) 12%	a) 73% b) 6% c) 10% d) 7%	
d) work at or mainly at home						

**Percentage of residents who travel to work**

3.56 The data is derived from the 2011 Census and so is only released for every 10 years. In comparison with the 2001 Census, the overall target was not been met. The percentage of residents who travelled to work by private motor vehicles has increased; the percentage of residents who travelled to work by public transport and worked at home decreased. However, there has been an improvement in increasing the percentage of residents travelling to work by foot or cycling. It is worth noting these data are potentially out of date and more recent data suggests a more positive picture. Recent monitoring conducted in the Norwich urban area showed that there has been a 40% increase in cycling since 2013. First Eastern Counties reported a 375,000 increase in Norwich bus journeys in 2015 after completion of Transport for Norwich changes to improve accessibility to the city centre for buses.

**Objective 8: to positively protect and enhance the individual character and culture**

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status
Percentage of Conservation Areas with appraisals adopted in the last 10 years	Year-on-year increase	LPA	Broadland	76%	76%	76%	70%	58%	Red
			Norwich	76%	76%	76%	76%	31%	
			South Norfolk	12%	12%	19%	42%	52%	Green

**Percentage of Conservation Areas with appraisals adopted in the last 10 years**

3.57 The percentage of conservation areas with recent appraisals has increased in South Norfolk but decreased for Broadland and Norwich. The figure for Norwich has decreased significantly as a large number of conservation area appraisals were prepared prior to 2010.

**Objective 9: to protect, manage and enhance the natural, built, and historic environment, including key landscapes, natural resources and areas of natural habitat or nature conservation**

Indicator	Target	Source	Location		14/15	15/16	16/17	17/18	18/19	RAG status
Net change in Local Sites in "Positive Conservation Management"	Year-on-year improvements	Norfolk Wildlife Trust	Greater Norwich area		73%	No data	73%	73%	74%	
			Broadland		75%		75%	77%	76%	
			Norwich		93%		90%	90%	87%	
			South Norfolk		70%		71%	69%	71%	
% of river assessed as good or better: a. Overall Status; b. Ecological Status; c. Biological Status; d. General Physio Chem Status; e. Chemical class	To increase the proportion of Broadland Rivers classified as 'good or better'.	Environment Agency	Broadland Rivers		No data	4% 4% 17% 23% 100%	4% 4% 17% 23% 100%	4% 4% 17% 23% 100%	4% 4% 17% 23% 100%	
Concentration of selected air pollutants NO2 and PM10 (particulate matter)	Decrease	LPA				2015	2016	2017	2018	
			Broadland	NO2 PM10	No data	below 40ug/m3 below 40ug/m3	below 40ug/m3 below 40ug/m3	below 40ug/m3 below 40ug/m3	below 40ug/m3 below 40ug/m3	
			Norwich	NO2 PM10	No data	12(LF); 55 (CM) 15 (LF); 21 (CM)	14 (LF); 56 (CM) 16 (LF); 20 (CM)	13 (LF); 51 (CM) 16 (LF); 23 (CM)	12 (LF); 54 (CM) 16 (LF); 27 (CM)	
			South Norfolk	NO2 PM10	No data	18.6µg/m3 N/A	25.9 ug/m3 N/A	25.0 ug/m3 N/A	25.0 ug/m3 N/A	
Percentage of SSSIs in favourable condition or unfavourable recovering condition	95% of SSSIs in 'favourable' or 'unfavourable recovering' condition	Natural England	Broadland		94%	94%	94%	94%	No data	
			Norwich		100%	100%	100%	100%		
			South Norfolk		93%	93%	93%	93%		
Number of listed buildings lost/demolished	None	LPA	Greater Norwich area		0	0	0	0	0	
			Broadland		0	0	0	0	0	
			Norwich		0	0	0	0	0	
			South Norfolk		0	0	0	0	0	
Percentage of new and converted dwellings on Previously Developed Land	25%	LPA	Broadland		54%	44%	46%	33%	36%	
			Norwich		88%	69%	93%	81%	86%	
			South Norfolk		28%	27%	9.4%	7.1%	9.1%	

### **Net change in local sites in “Positive Conservation Management”**

- 3.58 Target has been achieved across the Greater Norwich area for increasing the proportion of sites in positive conservation management.
- 3.59 **The percentage of river assessed as good or better**  
The percentage of rivers assessed as good or better has remained the same from the previous monitoring year.

### **Concentration of selected air pollutants**

- 3.60 The pollution level in most areas of Greater Norwich are well below the recommended maximum. However, some specific locations form hotspots within Norwich. These include Castle Meadow and St Stephens where the concentration of nitrogen dioxide has been high. Buses and taxis are the main causes of these emissions. Norwich City Council is working on measures including traffic management and enforcement of Castle Meadow’s Low Emission Zone to address this issue. It is also important to view this in the context of there having recently been significant improvement in air quality in St Stephens and Castle Meadow. Please note this year’s data has not been ratified by DEFRA and as such it needs to be viewed with a degree of caution.

### **Percentage of Sites of Special Scientific Interest (SSSIs) in favourable condition or unfavourable recovering condition.**

- 3.61 No comparable data has been released this year.

### **Number of listed buildings lost/demolished**

- 3.62 The target was achieved as no listed building were lost or demolished this year.

### **Percentage of new and converted dwellings on Previously Developed Land**

- 3.63 The target was achieved in Norwich and Broadland.

## Objective 10: to be a place where people feel safe in their communities

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status
Reduction in overall crime	12/13 (pro rata)	Norfolk Police	Greater Norwich area	20,363	22,403	24,431	26,981	29,228	
	Broadland 3,871		Broadland	3,619	3,985	4,089	4,584	5,162	
	Norwich 14,409		Norwich	12,562	13,919	15,513	17,176	18,344	
	South Norfolk 4,033		South Norfolk	4,182	4,499	4,829	5,221	5,722	
Number of people killed or seriously injured in road traffic accidents	Year-on-year reduction in those KSI	Norfolk County Council	Greater Norwich area	196	173	194	177	210	
			Broadland	68	45	61	48	46	
			Norwich	65	58	63	57	85	
			South Norfolk	63	70	70	72	79	

### Reduction in overall crime

3.64 There has been an increase in total crime in 2018/19. The Crime Survey of England and Wales continues to cite the impact of improvements in crime recording processes as a reason for increases in police recorded crime.

### Number of people killed or seriously injured in road traffic accidents

3.65 The number of people killed or seriously injured in road traffic accidents has increased this year. The greatest increase is experienced in Norwich, where vulnerable road users such as pedestrians and cyclists make up the greatest number of casualties.

**Objective 11: to encourage the development of healthy and active lifestyles**

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status	
Percentage of working age population receiving Employment Support Allowance and incapacity benefits	In line with annual national average	DWP benefits claimants (NOMIS)	Greater Norwich area	5.50%	5.70%	Data discontinued	Data discontinued	Data discontinued		
			Broadland	4.40%	4.60%					
			Norwich	7.50%	7.80%					
			South Norfolk	4.10%	4.20%					
Life expectancy at birth of males and females	Increase at each survey	ONS	Broadland	Males	80.8	80.7	81.1	Data not yet released	Data not yet released	
				Females	84.3	84.4	84.5			
			Norwich	Males	79.6	78.9	78.3			
				Females	82.9	82.9	82.8			
			South Norfolk	Males	81.7	81.4	81.3			
				Females	84.3	84.4	84.8			
Percentage of physically active adults	Increase percentage annually	Public Health England	Broadland	59.60%	62.10%	No data	63.00%	Data not yet released		
			Norwich	61.10%	59.50%	No data	68.50%			
			South Norfolk	58.70%	63.40%	No data	69.10%			
Percentage of obese adults	Decrease percentage	Public Health England	Broadland	25.60%	No data	19.90%	22.80%	Data not yet released		
			Norwich	19.60%		18.20%	22.50%			
			South Norfolk	23%		22.70%	21.90%			
Percentage of obese children (yr 6)	Decrease percentage	Public Health England	Broadland	14.80%	13.40%	13.90%	15.50%	Data not yet released		
			Norwich	18.60%	18.60%	19.20%	18.70%			
			South Norfolk	16.30%	15.80%	14.60%	15.10%			
Health Impact Assessment	All development of 500+ dwellings to have health impact assessment	LPA	Broadland Norwich South Norfolk	Assume all relevant planning applications comply						
Accessibility of leisure and recreation facilities based on Sport England Active Places Power website	Trajectory to reduce by half the percentage of wards with less than the EoE average personal share of access to sports halls (2009 base = 67%), swimming pools (65%) and indoor bowls (12%)	LPA/Sport England		See table in para 3.72						



**Percentage of working age population receiving Employment Support Allowance and incapacity benefits**

3.66 The data for this indicator has been discontinued.

**Life expectancy at birth**

3.67 Life expectancy remained broadly the same as the previous year (2015-16).

**Percentage of physically active adults**

3.68 The latest release of data suggests there is an increasing proportion of physically active adults across all three districts.

**Percentage of obese/overweight adults**

3.69 There is an increasing proportion of obese/overweight adults in Broadland and Norwich, but a slight decrease in South Norfolk.

**Percentage of obese children**

3.70 There is a slight rise in the proportion of obese children in Broadland and South Norfolk and a slight decline in Norwich.

**Health Impact Assessment**

3.71 All relevant planning applications (over 300 homes) require health impact assessments in order to be validated/approved, so it is assumed that compliance with this indicator has been achieved.

**Accessibility of leisure and recreation facilities**

3.72 Data is not available for this indicator.

Area		14/15	15/16	16/17	17/18	18/19	RAG status
Greater Norwich area	Sports Halls Swimming Pool Indoor Bowls	No data	No data	No data	No data	No data	

**Objective 12: to involve as many people as possible in new planning policy**

Indicator	Target	Source	District	2011/12 – 2016/17	RAG status
Statement of Community Involvement	Statement of community involvement Less than 5 years old	LPA	Broadland	Adopted 2016	
			Norwich	Adopted 2016	
			South Norfolk	Adopted 2017	

**Statement of Community Involvement/Engagement**

- 3.73 The Statement of Community Involvements for all three districts were reviewed and revised in 2016 to standardise the approach to public involvement in plan making across the three districts and support the preparation of the new Greater Norwich Local Plan.

Appendices A to G see [webpage](#)

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