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Our Ref: EP/WF/AE/ R01411

The Greater Norwich Local Plan 2045 Team (Floor 5)
County Hall
Martineau Lane
Norwich
NR1 2DH

28th September 2026

Dear Sir or Madam

GREATER NORWICH LOCAL PLAN (2045): SCOPING CONSULTATION – 17TH AUGUST – 28TH SEPTEMBER 2026
REPRESENTATION ON BEHALF OF BURT BOULTON HOLDINGS LTD

I write in respect on behalf of Burt Boulton Holdings Ltd to provide representation to Greater Norwich Local Plan (2045) Scoping Consultation questions listed below:

- A2 Indicative Structure and Content of the GNLP 2045
  - A2.2 The Growth Strategy and the Settlement Hierarchy
  - A2.4 Local Policy Coverage – Housing

The purpose of this correspondence is to inform the Greater Norwich Local Plan (2045) scoping consultation as an information gathering exercise in informing Broadland District Council and South Norfolk Council Local Planning Authorities' (LPA) review of its Local Plan and potential future site allocations.

The representation analyses the Site against the various Strategic Housing Land Availability Assessment (SHLAA) tests that are set out within the National Planning Policy Guidance (NPPG).

The representation comprises three elements:

1. Status of Greater Norwich Local Plan (2045)
2. Representations to A2 Indicative Structure and Content of the GNLP 2045
3. Conclusion

1. Status of Greater Norwich Local Plan (2045)

Greater Norwich Local Planning Authority (LPA) is currently preparing a new Local Plan. The LPA note they are gathering preliminary evidence and preparing initial technical documents to support their review.

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It is noted the Scoping Consultation was written prior to the publication of the new National Planning Policy Framework (NPPF) on 17th August 2026.

This submission seeks to respond to the Scoping Consultation including its consistency with the NPPF 2026, particularly with refence to national decision-making Policy S4 relating to the principle of development within settlements.

2. Representations to A2 Indicative Structure and Content of the GNLP 2045

A2.2 The Growth Strategy and the Settlement Hierarchy

Question 4 - Which elements of the existing growth strategy and settlement hierarchy do you think have and have not worked well?

Greater Norwich's adopted growth strategy is set out in Policy 1 (The Sustainable Growth Strategy) of the 2024 adopted GNLP and is illustrated in the plan's key growth diagram in Figure 1.

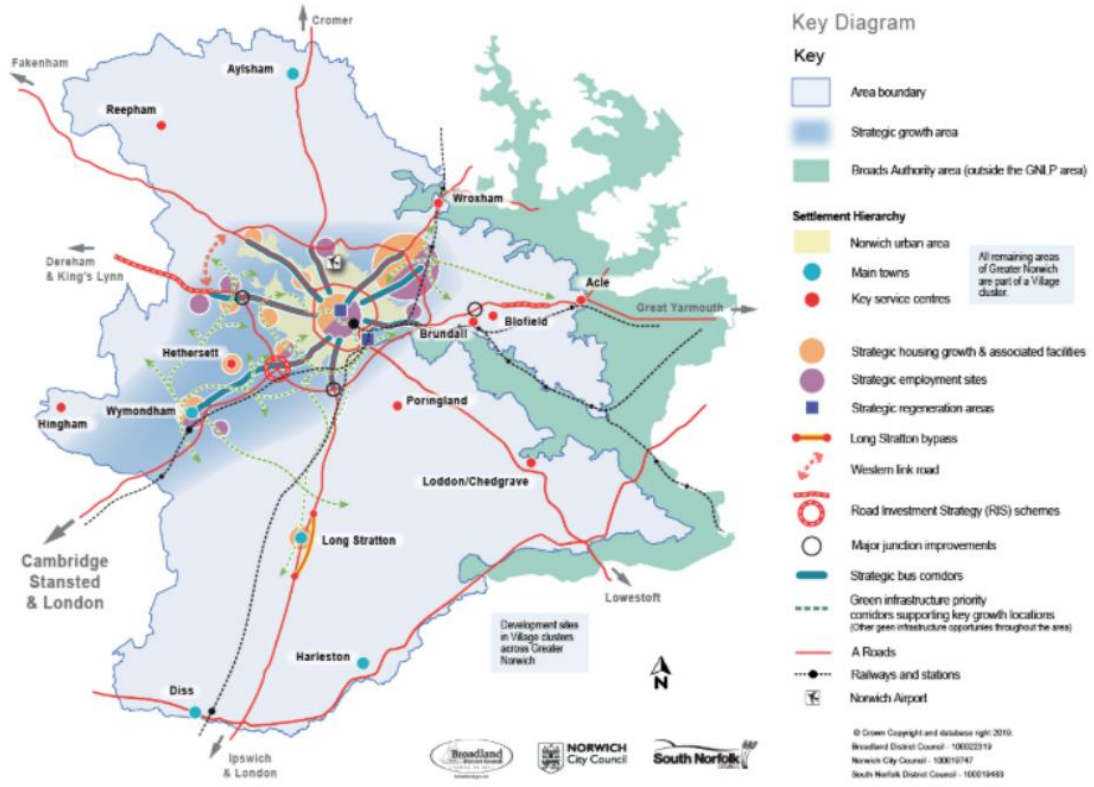


Figure.1 GNLP (2024) Growth Strategy

The major focus for growth is the Strategic Growth Area towards the Cambridge, Stansted Corridor as outlined above. This is broadly supported. However, the settlement hierarchy set out in GNLP policy 1

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(the Norwich urban area; main towns; key service centres and village clusters) in terms of scales of growth should be reconsidered to better reflect access to services and jobs.

For example, the adopted growth strategy fails to consider key urban areas capable of supporting significant housing delivery, particularly the Main Towns of Aylsham, Diss, Long Stratton, Harleston and Wymondham. These benefit from good accessibility by public transport and are attractive places for new housing, as shown by the strong levels of delivery between 2018 and 2025 which exceed the GNLP target for the whole plan period.

It is also noted in the scoping consultation document that the delivery of employment sites and improved infrastructure has supported this housing growth in the Main Towns. This includes the recent delivery of the Long Stratton bypass which will also unlock significant plan-led growth in South Norfolk, Long Stratton and Diss.

As such, the principle of the settlement hierarchy is supported but greater focus should be placed on Main Towns, which provide the opportunity to promote further growth where employment and infrastructure is strong should be awarded greater focus.

The growth strategy presented in Figure 2 below from the scoping consultation document is therefore supported. Furthermore, an additional Strategic Growth Area towards Ipswich (with further links to Essex and London) should be considered, encompassing the main towns of Long Stratton, Harleston and Diss.

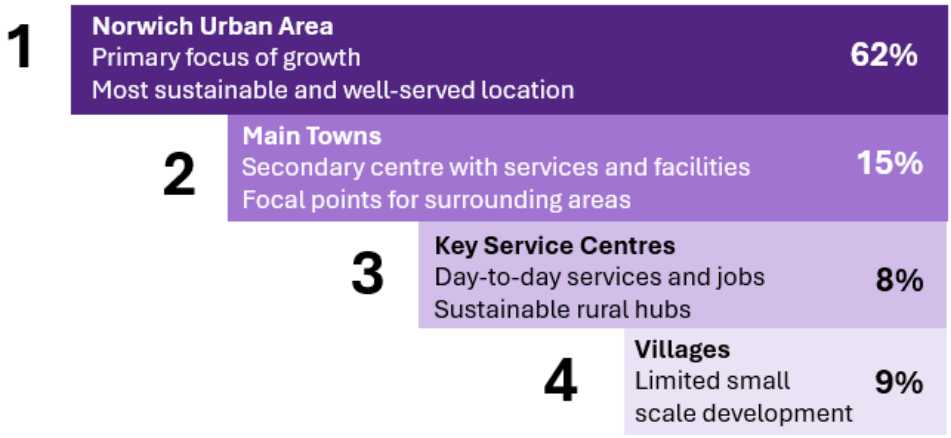


Figure 2 Settlement Hierarchy

Question 5

- *How can the GNLP 2045 support the development of brownfield sites?*
- *What development types would you support as part of our updated Growth Strategy?*

The GNLP (2045) is broadly consistent with the NPPF for a 'brownfield first' approach but greater clarification and focus on intensification of development within existing settlements. This should prioritise the most accessible sites, such as those located near railways station and/or within town centres.

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The following in the scoping consultation is supported for inclusion in the draft Local Plan:

> *"As well as allocating sites for brownfield development, potentially at higher densities than previously, there is the possibility of including policies in the plan which encourage more windfall development on smaller non-allocated brownfield sites to come forward."*

In addition to allocating brownfield sites wherever possible, the draft Local Plan should include policies that provide clear and unambiguous support for the development of non-allocated brownfield sites, particularly when these meet the objectives set out in Policy L2 of the NPPF, which must be given substantial weight in favour (my emphasis **emboldened**):

> *"a. Remediating despoiled, degraded, derelict, contaminated or unstable land;*
> *b. Making better use of vacant and underutilised land and buildings (such as: by bringing back into residential use empty homes and other suitable buildings; converting space above shops;* ***redeveloping underutilised retail and business sites****; and building on or above service yards, lock-ups, car parks and other transport infrastructure which are no longer required);*
> *c. Making effective use of previously developed land and buildings through temporary uses, in situations where alternative development is anticipated within a reasonable period (including as a result of the land being allocated for an alternative purpose in the development plan); or*
> *d. Creating additional homes or floorspace within settlements by using the airspace above existing residential and commercial premises, or through sensitive redevelopment or additional development within existing plots (including, but not limited to, the addition of mansard roofs, proposals to fill gaps in the existing roof line, the introduction of higher buildings at street corners and additional units within residential curtilages)…"*

Additionally, greater focus should be placed on the following development types, throughout the GNLP boundaries:

- Housing-led mixed-use (Employment Anchored) development
- Transit-oriented and connectivity-focused development

The GNLP 2045 could help support development of brownfield sites by placing greater weight on the government's connectivity tool, which the NPPF noted provides a means of assessing the accessibility of a location. The draft Plan should support development in areas with a good overall connectivity score, especially within settlements, based on ability to access everyday services, employment and social engagements via public transport and active travel.

Question 7 – Should any changes be made to the settlement hierarchy through the new local plan? Please explain your reasons.

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As noted above, it is considered that the settlement hierarchy should be amended to further support the delivery of housing and other development within the identified Main Towns in Greater Norwich. This should increase the proportion of growth planned within the Main Towns to a minimum of 18%, to reflect actual levels of current delivery.

The Scoping Consultation assumes the majority of the allocations in the adopted plan which have not yet been developed will be carried forward into the GNLP 2045, forming a key part of the updated growth strategy. In relation to housing, 60% of allocated sites and sites with planning permission meet the total need from 2026 to 2045. The Scoping Document confirms an additional c.20,000 dwellings are required to be delivered in the district throughout the plan period and therefore the following will be required to ensure delivery: -

- Increased list of site allocations
- Windfall allowance will make up a material proportion of housing delivery

Approximately 40% of housing need is currently remains unmet, and between 2018-2025, 33% of all housing delivery within GNLP has been through windfall. Therefore, the settlement hierarchy should include provision to accommodate windfall allowance at each settlement classification, in addition to a further tranche of Site Allocations.

For example, greater emphasis should be included in the Growth Strategy (currently set out in paragraph 166, part F of the GNLP (2024)) of the role of windfall development in meeting housing need. This should not be limited to small-scale housing developments and should also include larger sites, particularly on brownfield sites.

The findings of the Densification and Brownfield Opportunities plus Townscapes Study (due to be complete in early 2027 to support the Regulation 23 consultation on Proposed Local Plan Content and Evidence) will assist with the subsequent updates including the allocation of new development sites and the infrastructure needs assessment.

This study will investigate underutilised industrial sites, lower performing retail areas, and other land uses like surface car parks and other types of infill development. This should support the aims of Policy L1 of the NPPF to "*identify ways of accommodating as much as possible of the identified need in the area of previously developed land*". This includes "*sites of all sizes which have the potential for redevelopment to secure a more effective use, such as through the reuse of service yards, lock-ups, car parks and other transport infrastructure which are no longer require, the reuse or intensification of underutilised retail and business sites, and estate regeneration schemes"*.

In line with the above and considering changing demand for employment space, it is recommended that the study identifies underutilised employment sites which may be used more effectively to provide residential or mixed-use development. This is necessary to meet the 34% increase in Greater Norwich's housing requirement compared to the adopted GNLP (2024).

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To assist the Settlement hierarchy and growth strategy, statistics like those in Table 1 (below) can better inform which areas should be the focus of growth. For example, Table 1 demonstrates that while South Norfolk includes majority of railways stations within the plan area, such as Diss, Haddiscoe, Spooner Row and Wymondham, it has the lowest proportion of local population residing within less than 15 minutes' walking distance to a railway station. This indicates there is a requirement for the growth strategy to focus housing within settlements around train stations.

Local Authority District	Households with no car or van ownership (%)	Less than 15-minute walk to railway station (%)	Less than 30-minute walk to railway station (%)	Less than 60-minute walk to railway station (%)
Broadland	11.0	7	15	43
Norwich	32.7	8	34	83
S. Norfolk	10.5	6	17	30

Table 1. Inequalities in private vehicle ownership and access to railway stations by district

A2.4 Local Policy Coverage- Housing

Question 11 - Should the GNLP 2045:

- *Provide additional coverage of rural housing and development outside settlement limits beyond that contained in the draft NPPF?*

The new GNLP should first consider housing within settlements, for reasons identified above for improved accessibility to employment, services and railway stations.

3. Conclusion

This letter of representation has recommended that the GNLP 2045 has greater potential to advocate policy to support sites for housing within the identified Main Towns and incorporate greater allowance for housing delivery for the following reasons:

- Greater Norwich's Local Housing Need has seen a 34% increase from the figure which informed the adopted GNLP (2024).
- Approximately 40% of the current housing need is currently not met through existing site allocations and permissions.
- Therefore, there is a need to allocate a significant number of new sites for housing. This should be informed by a new, comprehensive call for sites process.

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- Additionally, the Settlement Hierarchy and Growth Strategy should include provision to accommodate windfall allowance at each settlement classification, in addition to an allocation-led / planned approach.
- Policies should support the development of windfall sites that are well-located, particularly on brownfield sites that are currently underutilised. This could form an important element of housing supply.
- Support is given to the draft Plan commitment to address inequalities in private vehicle ownership and access to railway stations, in particular within the Densification and Brownfield Opportunities Study currently being undertaken.

It is therefore respectfully requested that the above responses to GNLP Scoping consultation and recommendations are included in the next stages of the Greater Norwich Local Plan.

If, in the interim, you have any queries please do not hesitate to contact either Eva Papai (eva.papai@rokplanning.co.uk) or myself at this office. I look forward to your formal acknowledgement of the representation.

Yours faithfully,



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