

Appendix 1

Draft Statement of Consultation, September 2018

VISION AND OBJECTIVES

Question 1

Do you agree with the draft vision and objectives for the plan below?

A total of 189 separate responses were received to this question. Of these, 126 agreed with the vision, 63 did not.

Overview

Views on the Vision and Objectives were varied, including:

- A number of bodies and groups sought an increased emphasis on sustainability and environmental protection, including Historic England requesting a focus on 'heritage at risk' and Natural England on protection and enhancement of the environment. There were also requests for an emphasis on stronger protection for river valleys;
- A number of comments, mainly from developers' agents, requested a greater emphasis on housing and jobs growth, whilst others felt that there should be less focus on growth given the amount of development already taking place;
- Some comments focussed on local democracy and Government planning policy;

Some respondents considered that certain policy aspirations or place-specific issues should be reflected. Specific points were raised concerning the importance of Neighbourhood Plans not being overridden, the need for the plan to support social diversity and the importance of protecting community facilities.

Summaries of Specific Comments

Those **who AGREED** with the vision and objectives commented as follows:

1. *Barratt David Wilson Homes* commented that objectives on homes should contain the wording "To enable and facilitate the prompt delivery ..." adding that councils should improve the speed of planning decision-making and that pre-commencement conditions should be kept to a minimum.
2. *Carter Jonas LLP* commented that a robust assessment of housing delivery would need to be set out to ensure that predictions about housing-building are realistic.
3. *Dennis Jeans Properties* are supportive of the vision subject to more detailed specific issues.
4. *Dominic Lawson Bespoke Planning (DLBP)* commented that their client's site for 300 homes and community woodland at Racecourse Plantation, Thorpe St Andrew is in line with the draft vision and objectives.
5. *Diss and District Neighbourhood Plan Steering Group* identify the need to reconcile the differences with the Joint Babergh/Mid Suffolk Local plan.

6. *Framingham Earl Parish Council* have serious reservations about the ability to meet the housing targets and the 45,000 jobs target. Many mass employers are shedding jobs, even closing branches, such as in the banking sector.
7. *Highways England* welcome the delivery of infrastructure and the intention within Greater Norwich to intervene if the market is unable to deliver.
8. *Lanpro* on behalf of *Glavenhill Strategic Land* are supportive of the vision, subject to more detailed representations on specific issues.
9. *Natural England* suggest the additional wording: "To grow vibrant, healthy communities supported by a strong economy and the delivery of homes, jobs, infrastructure and a protected and enhanced environment." Attention is also drawn to the Government's 25 year Environment Plan.
10. *New Anglia LEP* commented that the objectives align with the Norfolk and Suffolk Economic Strategy. Norwich and the Cambridge-Norwich Growth Corridor are priority places for the digital creative, advanced manufacturing and engineering (including aviation), life sciences and bio-tech and advanced agriculture and food and drink sectors. New Anglia LEP would like to see a reference to its Economic Strategy in the GNLP. It is also considered that "skills and social inclusion" is under-represented in the GNLP.
11. *Norwich Business Improvement District* supports the vision but seeks clarity. Whilst stressing the need for good quality affordable homes, clarity is sought on the definition of "high quality" homes because otherwise the capacity to deliver the high target of new homes could be limited. It is also considered that the "timely delivery" of infrastructure should be "more proactive", as this definition might limit the capacity for growth.
12. *NHS Norwich Clinical Commissioning Group* comment that health and care partners support the vision but that the GNLP needs to align with the objectives of the Norfolk and Waveney Sustainability and Transformation Partnership (STP). There are five objectives: 1 Preventing illness and promoting well-being; 2 Care closer to homes; 3 Integrated working across physical, social and mental health, 4 Sustainable and effective services, and 5 cost-effective services.
13. *Norwich Cycling Campaign* agrees that development land should be allocated to meet needs in locations where there are services, facilities, employment and sustainable transport; and, sees "ad-hoc" development as the biggest risk to the vision of a liveable city. Ad-hoc growth could lead to poorly connected places with more and longer journeys by car. Norwich is not a high-wage economy and cycling is an economic means of transport. More infrastructure is needed for fast, convenient routes into the City from out-lying areas. The Marriott's Way is one of a few such routes, but its surface is inadequate. With the growth in online shopping, and home deliveries, a good quality network of routes for non-motorised vehicles is necessary to limit the impact of growth.
14. *Persimmon Homes* supports the vision, adding that the delivery of new homes should be in the right location; not just in terms of sustainability but also in locations where people want to live.
15. *Pigeon Investment Management* raises no objection but points out that the local plan must be a streamlined tool for balancing objectives.
16. *Savills* on behalf of several clients is supportive of the vision but considers that the plan should be mindful of the need to ensure a thriving rural economy.
17. *Suffolk County Council* considers the vision to be logical but draws attention to the challenges posed by the needs of an ageing population

18. *Taylor Wimpey* raise no objection to the vision but say the housing policies will need a likely uplift on the [figure produced by the Government's] standard methodology for calculating housing need. The housing trajectory will need to be robust and realistic about housing delivery rates as well.
19. *UEA Estates and Buildings* welcomes the collaborative approach taken by the local authorities and draws attention to its own vision to 2030 for the University.
20. *Wrampingham Parish Council* says that objectives need measures against them, otherwise they are statements that may never be achieved and have no one accountable for them.
21. Concern at the "high density of already approved plans" that affect Blofield and Brundall. Little consideration is given to agricultural land food production, damage to the water table in "concreting over" a county with low rainfall, loss of green space, loss of community spirit by losing village status, and road congestion at the A47 [from Blofield and Brundall].
22. What is said about the economy should be broad based but also to continue to develop some real and distinctive specialisms.
23. How a city can grow sustainably and bring the greatest benefits to the widest group of people should be highlighted more. Growth can be a force for positive change, but no more out of town office/retail.
24. "Yes BUT the phrase 'intervention strategies' is used within one of the 'blue buttons' of the illustration, in the context of insuperable problem to delivery. If any of these 'strategies' avoid a decision being taken by Elected Members of the District or City Councils, even County, then I am opposed."
25. Admirable if believed, but the development plans do not actually fit, or go far enough towards, these objectives.
26. "All sounds desirable...especiallygood access to jobs services and facilities....a chance to link new developments to town and workplace by trams - reducing pollution."
27. Support for the plan objectives but not necessarily the "deductions" that will be made from it.
28. There is a great deal of land and open space in Norfolk but the character and environment cannot be ruined.
29. The infrastructure point is critical; doctor's surgeries and the Norfolk and Norwich Hospital cannot cope.
30. There are adequate broad-brush statements, but [there is] not enough emphasis on low-cost housing, social housing, and integrating different sized properties and tenures together to develop more cohesive communities.
31. This is a "bad question" for not allowing comment on certain sections. However, the point made is that the need for more housing has become a mantra and not necessarily a truth. The UK is already the most densely populated in the European area, and more houses is not necessarily the answer.
32. There are no targets for climate change adaptation, mitigation or emissions reduction. Ambitious, measurable and audited targets are needed in line with commitments under the Paris Agreement. However, housing is rightly mentioned. Long term affordable tenancies create stable resilient communities.
33. The need for employment and housing is as important as protecting our natural environment.

34. “The objective has to be to provide housing for people to live well in. The developers are the means by which it is delivered – the objective is not to maximise the profits of developers.”
35. The principles by which plans and development should be tested should be widely consulted upon in a separate exercise from the GNLN plan consultation, both with stakeholders and general public. Principles should include: carbon reduction, infrastructure efficiency, land use efficiency, resource efficiency (including cost in use), local economic capture, place competitiveness, resilience, response to context (scale, massing, conservation and character), productivity, responsive development to issues of gender, age and equity of opportunity.

Those **who DISAGREED** with the vision and objectives commented as follows:

1. *Brockdish and Thorpe Abbots Parish Council* considers the strategy deeply flawed. Laudable aims are the delivery of homes and there is analysis via the SHMA. The over-allocation of land creates a developer “free-for-all”, nor does such an over-commitment allow for money or focus for infrastructure investment. It is surprising there is no analysis as to why 35,665 homes have not been developed. Lessons should be learned as to why those in housing need do not have access to the houses which are built. Those lessons are: that new land should only be released in phases when existing commitments (including brownfields) are nearing exhaustion; there is the means, including public sector housing, to ensure identified housing need is met; and, coordination is needed between relevant agencies for housing. A further criticism is the cost of the GNLN consultation exercise that has not resulted in positive action on such matters as housing.
2. *Climate Hope Action in Norfolk* queries the adequacy of the vision. It is questioned whether the challenges are addressed to do with sea level rise, heat waves, and water stress. It is pointed out that as well as the action on climate change needed before 2036 that the developments built will stand well beyond that date and so policies must think further ahead if Norfolk is to continue to thrive. There are also opportunities from carbon mitigation and adaptation, which includes attracting new industries and the health benefits to people. As public health is now a local authority function, and the House of Commons Health Committee has recommended that health should be included as a material planning consideration, the GNLN should do more to link carbon mitigation strategies to reducing health inequalities. The six objectives outlined are desirable but lack the necessary emphasis about the challenges and uncertainties of climate change.
3. *Colney Parish Meeting* view the Plan’s vision with “determination” and “resignation”. A clearer sense of population numbers, styles of living, use of energy, greenhouse gases and water, and “green wedges” along the river valleys to guard against flooding. A device is wanted for allowing people to “share the planning process” but this is not offered other than “vague suggestions over monitoring”.
4. *Costessey Town Council* say protect the environment, especially river valley designations, that there should be a vision for major infrastructure, and that infrastructure should be built first before the homes.
5. *CPRE Norfolk* refer to the need to phase developments, ensuring the 35,655 home existing commitment is built first. Otherwise, the concern is developers will “cherry-pick” newly allocated greenfield sites. There is concern too for affordable and social

housing. If the draft vision is followed historic mistakes will be repeated, where those in real housing need do not have their needs met.

6. *The Education and Skills Funding Agency (ESFA)* says that the housing targets will place significant pressure on social infrastructure such as education facilities, on top of the additional pressure expected from an increased birth rate, but the references to social and community infrastructure in the vision are welcomed. The reflection on addressing the accessibility of new housing to schools, and the promotional of higher education, in the Sustainability Appraisal is supported. The idea of exploring through the GNLP's spatial strategy the potential to improve educational attainment is supported because Norwich is classified as a Category 6 'Achieving Excellence Area'. In answer to Question 20, the ESFA recommends that the next version of the GNLP makes reference to the Norwich Opportunity Area Delivery Plan, as designated by the Department for Education. As well as complying with para. 72 of the NPPF, a sufficient mix of school places will demonstrate that the GNLP has been positively prepared.
7. *Great and Little Plumstead Parish Council* say that in reality economic growth subjugates the other objectives. The GNLP should adopt policies that reduces, rather than just adapts, to climate change, primarily by reducing car dependency and improving dwelling standards. The failure on affordable housing policy should be addressed, as the recent Rackheath Plan for 4,000 homes includes 10% affordable housing, against an original target of 25% and 33%.
8. *Historic England* considers the diagram for the vision as lacking detail. Description should be given to the local nature of heritage in Greater Norwich, as well as how heritage contributes to making high quality places where people want to live and work. A request is made to change the vision in Fig. 1 on page 17 to change "enhanced environments" to "enhanced built, natural and historic environments". To not account for the heritage assets, and to the Heritage at Risk Register, as an objective risks making the plan unsound. A list is provided of those buildings on the National 2017 Heritage at Risk Register in Greater Norwich. Given the number of entries on the Heritage at Risk Register, the site allocation process could be relevant to determining opportunities to enhance heritage assets, as well as checking for development proposals that could cause unacceptable harm to a heritage asset. The number of entries on the Heritage at Risk Register could also be a useful monitoring measure for the GNLP. A policy basis could be set in the GNLP to levy CIL, or other contributions, to safeguard designated assets. Whilst the national Heritage at Risk Register covers Grade I and II* assets, Historic England recommends setting a policy in the GNLP for maintaining a register of Grade II heritage assets.
9. *Marlingford and Colton Parish Council* consulted local residents at a public meeting and does not accept many of the premises advanced [their reasons are set out in responses to other questions].
10. *Poringland Parish Council* says "sustainability" and "diversity" are omitted. Villages are becoming less diverse and [promoting diversity] should be central to the vision.
11. *The Liberal Democrat City Council Group* said do more to address climate change with adaptation, mitigation, building to Passivhaus standards, and a transport strategy aligned with development proposals.
12. *The Wensum Valley Alliance* says the decision for the Food Enterprise Zone Local Development Order shows how economic arguments take precedence. The aims for climate change have been "watered down", and "mitigate against" implies an

acceptance of adverse problems. Affordable housing should have priority status as the mix and demand for housing is not being achieved. No mention is made of affordability, meaning houses that are less than £200,000 (the cheapest house on the recently developed Brundall site). Environmentally, the neighbourhood plan in Brundall sought to protect the land north of Berryfields for landscape reasons, but Broom Boats have planning permission for 150 homes. However laudable the objectives, if planners take no notice now, how can residents be sure that they will in the future?

13. The “schematic” is “wordy”, and “flowery”. The emphasis is on “destructive urbanisation” (roads, housing, population growth) against the desires of most existing residents. The environment objective is “wholly inadequate ... Utilitarian in the Benthamite sense”, using words such as “mitigate” and “make best use of”. The word “protect” is used but “mitigation” and “best usage” are not strong components of a protective regime. Development is “despoiling `England`s Green and Pleasant Land. ` Once it`s gone, it`s gone for good”. Alternative phrases to use are “ensure the absolute minimum detrimental impact on the natural environment” or “disallow development that impacts disproportionately on the natural environment”.
14. The infrastructure objective (as expanded elsewhere in the document) is almost entirely car-based; and, so directly opposed to healthy communities, high quality of life, protecting the environment, and mitigating climate change. There is too much focus on “aggregates”, meaning it is not the amount of housing as the kind, and it is appropriate infrastructure that is needed (not as much as possible).
15. The vision will not meet the housing needs of the area unless there is a significant investment in local authority housing. Councils should be able to borrow, be supported by central government, and keep 100% of rents to re-invest. It should be stated that the GNLP will be driven by council-funded house-building, similar to that of 1978 when 250,000 houses were built nationally with 40% built by local authorities.
16. The consultation is not wide enough, for example to increase social mobility, consideration is needed of education provision and healthcare provision. More joined up thinking is needed between local and central government.
17. Concern about the possible loss of the Bush Road allotments in Hellesdon. Allotments benefit people’s mental and physical health, and bring communities together. The loss of public houses to shops is also damaging to the sense of community.
18. “Sustainability” and “diversity” are omitted.
19. Sustainability is critical to the National Planning Policy Framework so the GNLP needs to reflect this.
20. Diversity is essential to issues to do with age/class/ethnicity/culture between the city, towns, and villages; and is making many settlements less sustainable. Issues identified are: “lack of young families is threatening schools and limiting the number of people who can carry out service functions”; and, “whole swaths of agriculture, industry and services in the area dependent upon immigrant labour, housed in temporary, overcrowded or substantially unsuitable accommodation”.
21. “You cannot just keep adding houses to a county without wrecking what is there”, leading to more traffic on overused roads that are not maintained, the proposed growth will make it dramatically worse.
22. The overriding presumption, passed down from central government that “growth is good” must be fought.
23. Housing should be dispersed with no new large settlements.

24. What is written is not a vision but a perhaps a corporately driven strategy, it says "everything and nothing", and it is hard to disagree with the desire.
25. The plan needs to focus more on making existing places fit for the 21st century and beyond. There is reference to "quality" but that is not automatically achieved on some housing developments. More effort has to be made to offsetting environmental impacts with new wildlife habitat. The GNLP is in danger of being a "covert land grab" rather than something of vision for "vibrant outcomes".
26. "Meaningless platitudes."
27. Specific points in one representation were:
 - a. "From key docs. (e.g. SA 8.2.3, "overarching economic need") it is clear that all objectives do not have equal status. Please state that 'all objectives have equal status'."
 - b. "To "mitigate against" climate change can mean almost anything. Please amend to "... will reduce greenhouse gas emissions, mainly by reducing car dependency" (SA 8.12.7)."
 - c. "Infrastructure. Please amend to 'development to be located near existing infrastructure and priority will be given to public transport and facilities for walking, cycling, riding including disabled access'."
 - d. "You confuse and interchange the words NEED and REQUIREMENT in key docs. However, the SHMA document is clear (5.84) – 'a policy on jobs target....forms part of the housing requirement, NOT HOUSING NEED' (my emphasis). I discuss in Q2."
 - e. "Make a strong statement on affordable housing."
28. Very much favour Norwich development over large scale development in outlying villages to address concerns about "greenbelt", the environment and climate.
29. Take up of new houses and business units In Poringland is not rapid and so the reasons for more of the same is queried e.g. "When the Shotesham Road units are not taken up why plan for more in Bixley"?
30. "Environment" is one of seven objectives so could become a "bolt-on" or "nice to have". If implemented the city could lose its "human-sized" scale, with access to countryside, and instead become "engulfed" by suburban sprawl.
31. A revised vision as "To foster vibrant, healthy, resilient communities supported by a strong economy and the delivery of homes, jobs, infrastructure, a thriving natural environment and a built environment that supports a high quality of life."
32. The need and justification, as well as political mandate voted for by the people of Norfolk, for mass migration is challenged. By promoting growth the overriding rural character of the county will be lost. The experience of the last 40 years, both in Norfolk and elsewhere in the country, has been to simply make things worse in respect to quality of life, provision of services, and has led to the creation of soulless housing estates. The political mandate of the GNLP process is challenged.
33. Specific points in one representation were:
 - a. Relevant documents to writing the vision are: Resolution 42/187 of the United Nations General Assembly, The UK Sustainable Development Strategy Securing the Future, and the three dimensions of sustainable development as set out in the NPPF.
 - b. More should be said about economic investment by better education and advanced technology. Given the Brexit vote, and the reduced migrant numbers

likely coming to the UK, there will be a finite number of workers to fulfil extra jobs. The effect being that the success of one local plan is likely to be at the detriment of another local plan. The GNLP fails to grasp the reality of economies of scale, science, automation, and artificial intelligence.

- c. Thought should go to greater productivity from the area's natural resources, which includes its existing labour pool. There needs to be as well a clearer picture in the local plan of how New Anglia LEP's nine priority sectors are applicable and their relationship to housing provision.
- d. The approach to sustainability is extremely weak with no back-up statistics or explanations. The Plan appears solely focused on growth with homes to support jobs, meaning other objectives appear secondary; and will be "managed as necessary. As to natural resources, no mention is made of how assets like water, specialist sands and aggregates, agricultural land woodlands, minerals and the landscape will be managed (all of which are the bedrock of the rural economy and tourist sectors).
- e. The plan also fails to acknowledge how the housing market is controlled by developers who release land at a rate to ensure that prices are maintained.
- f. Given that the homes already committed to in plans will take 20 years to build, new developments should only be introduced once existing ones have built out, otherwise developers will cherry-pick the most greenfield ones profitable ones.

34. Specific points in one representation were:

- a. The assumption in the Strategic Housing Market Assessment that the housing shortfall in the first seven years of the Joint Core Strategy can be recovered in the remaining 11 years is over optimistic.
- b. There is no discussion on the effect from the Greater Norwich Local Plan for the rest of Norfolk in terms of movement patterns on unsuitable roads to the fifteen Tier One Employment sites identified in the Norfolk Strategic Framework.
- c. The plan for Norfolk should ensure the existing towns and villages expand suitable employment. DEFRA recognises that the food and drink sector should be key to growth in the rural economy. Concentrating such business to the Food Hub at Easton is disagreed with. Consider locating the Food Hub at Colman's Carrow Site, not on agricultural land.
- d. Better broadband should also give opportunity for other small to medium enterprises in towns and villages.
- e. Paragraph 7.2.1 of the Sustainability Appraisal Report is queried, as it states 27,400 additional jobs "is effectively evolution of the baseline". However, if the extra 17,600 jobs above the baseline will have an effect on certain measurement categories, surely the same will apply to the 27,400 jobs in the baseline. Some substantiation or mitigation about the effect of JT1 (the baseline jobs growth) is needed as more greenfield land will be needed by this jobs growth.
- f. There is no explanation of how existing infrastructure will meet growth ambitions. Where infrastructure needs improvement needs to be explained, including consideration of Bus Rapid Transit and rail/tram.
- g. The brownfield registers should be expanded to include smaller sites with potential for fewer than 10 houses, so as to reduce need for greenfield land

- h. Paragraph 4.7 of the Growth Options document is a weak and ineffectual statement. Employment through SMEs in towns and villages should be more than an afterthought for encouragement.
35. All that appears to have mattered over the last few years is building houses. Those homes are then often bought by buy-to-let landlords, or people moving to the area after selling a property in a more expensive part of the country, which excludes local residents. Around Barford, Barnham Broom, Colton and Marlingford there are stunningly beautiful areas put forward for development, rich in habitat and history. “We are told that the decisions are being made by people who don't know the areas on the basis of a paper exercise.”
36. Objects to Hainford becoming a service village as the facilities (or lack of facilities) matches those of Frettenham.
37. All I can see is homes being built. Where are jobs and infrastructure? All the allocations appear to be for housing. There will be no community if community features are not considered.
38. More could be done to meet the UN's Sustainable Development goals on (7) Affordable and Clean Energy, (9) Industry Innovation and Infrastructure, (11) Sustainable Cities and Communities, and (13) Climate Action. Not enough is done in the Joint Core Strategy in respect to Clean Energy and Smart Cities as shown in the poor statistics published in the Annual Monitoring Report.
39. The Utilities site needs to be changed as it includes mention of an incinerator (*sic*). The policy text for R10 needs amending. The sentence “seek to maximise the use of renewable and low carbon energy sources” should change by removing the second part of the phrase “including the provision of district wide heating and CHP”. The sentence: “a noise assessment is required and the development should be designed to mitigate the impact of noise from the adjacent uses and potential noise from the future power station” should be changed by replacing “station” with “generation”. The point being to create opportunity for development other than as an incinerator (*sic*).
Note that this representation is discussing a potential amendment to policy R10 of the Norwich Site Allocations and Site Specific Policies Local plan prepared by Norwich City Council, relating to the Utilities Site at Cremorne Lane. That site is not being proposed for reconsideration at this stage of the GNLP process.
40. The requirement for 10% of energy on new developments to be from renewable sources is unambitious. Why not be more ambitious, like in London? With regard to transport, a major shift is needed away from the “obsession” with road building, and their “failure” to invest in public transport.
41. More needs to be said about climate change: the need for a low emissions economy; the problem of specifically numbered delivery targets for homes and jobs outweighing the sustainability of development options; that a way to improve the objectives is to make climate change integral to the goal of infrastructure; and that low emissions, carbon neutral homes (including considerations about the construction materials) are needed.
42. Too much is loaded in the developer's favour. Too often councils ‘roll-over’ on [the issue of] developers providing affordable housing because it is “unviable”, partly because of the government's housebuilding targets. Young local people can't afford to stay in the area and it is a concern that so much rural land is earmarked for development that will impact upon Norfolk's countryside and its tourism economy.

BROAD STRATEGIC APPROACH

Question 2

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

A total of 168 separate responses were received to question 2. Of these, 96 supported the broad strategic approach, 56 did not and 16 did not answer yes or no but made additional comments or submissions. The following is a summary of the response received to Question 2, many of which were recorded under the “any other issues” of question 66.

Overview

96 respondents were in favour of the broad strategic approach proposed for new jobs, homes and infrastructure. The approach includes 45,000 additional jobs by 2036, along with 42,865 new homes (of which 7,200 would be on new sites) to be focussed in and around the main urban area and in towns and villages with a range of services.

56 respondents did not agree with the proposed approach. Development industry respondents were generally supportive of the strategic approach; or, sought more development to meet the City Deals growth target, or to support development in rural communities. Residents and community organisations tended to be more negative about the strategic approach, pointing to the challenges and possible adverse consequences of growth for infrastructure, services, community cohesion and the environment.

Summaries of Specific Comments

1. *Framingham Earl Parish Council* have reservations about the jobs forecasting, as many businesses are reducing staff and there are no longer big industries in the region.
2. *Kimberley and Carleton Forehoe Parish Council* says social impact, not economics, should drive policy. Local opinion should have more credence in policy. Large developers are there to make money. More consideration needs to be given to the impact of developments on the community. Farmland is needed for food production and development should be focused into Norwich. Slow growth in towns and rural areas is supported provided there is infrastructure. Development near areas where the commercial economy is developed is necessary as people have to travel significant distance to access employment.
3. *Thorpe St Andrew Town Council* would like more emphasis on promoting the green economy so as to offer sustainable jobs within Norfolk.
4. *Barnham Broom Golf and Country Club* support the approach, adding that the following elements should be given further emphasis: supports a thriving rural economy; helps to sustain village life; provides housing that is fit for purpose (e.g. starter, retirement/elderly, holiday); and, provides choices and aids housing delivery.
5. *CODE on behalf of Ben Burgess* particularly supports paragraph 4.2 on the drive for economic growth. There is a need to focus on the “hubs” of particular sectors but also to

- expand the indigenous industries which have already brought prosperity and have managed to adapt to changing circumstances and economic conditions.
6. *Cornerstone Planning on behalf of Norfolk Homes* comment on encouraging a strategy for main towns and rural areas to grow, as well as ensuring greenfield development takes place in accessible locations e.g. a site in Aylsham promoted by Norfolk Homes.
 7. *Dennis Jeans Properties* have serious concerns about the overall housing requirement. The favoured options must be to deliver the jobs growth, plus additional growth. A realistic assessment is for 11,000 to 14,000 homes to deliver the City Deal jobs growth aspirations.
 8. *Gladman Developments* says that the GNLP should seek to meet economic aspirations and the City Deal. The focus for economic growth should be Norwich, but paragraph 55 of the NPPF discusses the needs of the rural economy. The level of growth aimed at sustainable rural settlements should be sufficient to meet the needs of the rural populations.
 9. *Harvey and Co* comments on the risks of “piecemeal” development increasing infrastructure requirements. Selective additional development in Norwich and the main towns will support local services, but equally could place unsustainable pressure on existing services.
 10. *Lanpro and Glavenhill Strategic Land* in their representation discuss the opportunities open to the Greater Norwich area and ask that the GNLP recognises some of that potential. Concern is however raised that paragraphs 4.1 to 4.7 miss the point about Greater Norwich being left behind, as the Greater Cambridge area continues to grow rapidly. The overall housing requirement is thought to be set too low, and should be between 11,000 – 14,000 homes ((instead of 7,200 homes) to achieve the City Deal jobs target. Opportunity exists for the Cambridge-Norwich Tech Corridor, and to establish a new settlement here, complemented by the development of less strategic sites in sustainable settlements. Examples promoted by Lanpro and Glavenhill Strategic are sites in Hethersett, Little Melton, Mulbarton, Little Plumstead, and Upper Stoke.
 11. *Norwich International Airport* in relation to promoting “Site 4”, also known as Imperial Park, argues that the broad strategic approach of the Local Plan is supported. However, Site 4 should not be restricted to aviation-related uses, as this is preventing development coming forward. Leaving the site undeveloped would mean the benefit of 3,298 jobs, £1,019,640 in CIL, and up to £106,507,238 in net GVA is not realised. The 46 hectare site, with its proximity to the NDR, is well-suited to general employment.
 12. *Otley Properties* says driving economic development is essential to the strategic approach and includes the City Deal homes and jobs targets. Growth in rural areas should not be overly restricted by the Local Plan, but rather positively framed for delivering homes, jobs and infrastructure. The Plan must also seek to make best use of, and improve transport and infrastructure networks, to and from rural areas.
 13. *Pegasus Planning Group and Barratt David Wilson Homes* say “accessible locations” should be clarified as “locations that are or can be made accessible”. The acknowledgement in the Growth Options document that developments can sustain town and village life is considered consistent with the NPPF.
 14. *Savills* make references to the NPPF (para 55), the Housing White Paper (Fixing Our Broken Housing Market), and the recent consultation on the new National Planning Policy Framework that reaffirms the importance of sustainable development in rural areas.

15. *Taylor Wimpey* reflect on the standard methodology published by Government for housebuilding targets. The opinion being that the standard methodology will come into effect in summer 2018 and increase the housing requirement for Greater Norwich.
16. *UEA Estates and Buildings* supports the statements in paragraphs 4.1 to 4.7 that in particular for the expansion and long-term vision of the University of East Anglia and Norwich Research Park.
17. *Westmere Homes* comments that economic growth should be the central driver for the GNLP. There is concern about the “disjointed” delivery of jobs, new homes and supporting infrastructure. It is important not to “skew” development too much towards Norwich as the Joint Core Strategy did.
18. “High quality homes” is mentioned but is not defined. It is queried why there is no growth planned for smaller village and settlements. Other points made:
 - a. Access to the City from the south-east is along potholed and rutted routes.
 - b. There are no safe cycling or walking routes from the Poringland area to the City.
 - c. Air quality is declining, the statement that more needs to be done is an understatement, and there is an inadequate number of monitoring stations.
 - d. No evidence is given for the “strong relationship of the Norwich urban area to surrounding parishes.
 - e. Norwich is a cultural, shopping, work destination for Poringland but it “otherwise keeps the City at ‘arms’ length”.
 - f. A ‘nod’ is given to landscape, including the importance of heathland, but does not show how to maintain environmental biodiversity
 - g. It is queried whether promoting water efficiency is enough, and water stress will limit the growth of Greater Norwich.
 - h. In respect to diversity, mention is made of young people in the City, travellers and houseboat dwellers, but misses issues of class, race and ethnicity.
 - i. Support is given to the strategic approach of the GNLP but that it omits to mention state and local authority support.
19. The strategy starts in the wrong place and should have the question of “what are the constraints that might have to be navigated to achieve our vision and objectives?” The question prompts answers to those constraints being: climate change; reducing carbon emissions; best use of transport networks; the SHMA evidence; the GVA employment evidence; education and skills agendas; the ageing population; the Cambridge-Norwich tech corridor; the existing land-use picture; building out of allocated sites; and, the economic uncertainty from Brexit.

JOBS GROWTH

Question 3

Which option do you support for jobs growth?

Option JT1: Plan to deliver forecast jobs growth plus additional growth.

Option JT2: Plan to deliver “business as usual” forecast growth only.

A total of 131 separate responses were received to this question. Of these, 78 supported Option JT1, 51 supported option JT2 and two supported neither option, one referring to the impact of Brexit being likely to make both unachievable, another arguing only for “an ambitious approach to job growth”. Responses included a number of caveats.

Around 60% supported the favoured “enhanced growth” option JT1, that is, forecast growth plus additional growth in accordance with the City Deal. There was however a sizeable minority in favour of “business as usual” forecast growth only (JT2).

Overview

Considerable support for the ‘enhanced growth option’ came from partners and organisations that had signed up to the City Deal. Supporters pointed to the strong and sustained economic growth across the plan period being justified by the Employment, Town Centre & Retail Study which evidences these ambitious growth targets, and it was important to set such targets in order to fulfil the area’s economic potential and attract investment. There was, however, a need for flexibility and contingency in the run up to Brexit, which could potentially result in short term jobs decline. Growth needed to be targeted in a diverse range of sectors especially those supporting the green economy and high productivity tech industry around the Airport and NRP. Skills gaps need to be addressed and there was an urgent need for key worker and affordable housing. The ‘business as usual’ trend based forecast was claimed to be founded on flawed evidence which did not factor in the growth already committed from the City Deal. There was also some concern that the potential of the Cambridge-Norwich tech corridor had not been adequately recognised in this option, and even higher growth was possible.

Among those supporting the ‘business as usual’ option there was scepticism about the deliverability of the enhanced forecast, given a historic failure to realise the more modest JCS targets, a perceived major negative impact of enhanced growth on the environment and existing infrastructure and the lack of evidence that a high growth strategy had so far made any real impact on inward investment: national companies having pulled out of Norwich rather than firms being attracted in. The ‘business as usual’ forecast was viewed by some as more credible and consistent. Reliability of long-term job forecasting was questioned by many respondents given so many unknowns. Some were concerned about the nature of jobs to be provided e.g. the role of tourism and the perceived mismatch between the need for higher value jobs in the rural areas and villages. A fear was expressed that growth in the targeted sectors would tend to focus employment development disproportionately on

Norwich and the higher order settlements resulting in increased commuting and preventing the rural economy from achieving its full potential.

A small number of respondents were dissatisfied with both options and considered the question skewed, in that both were predicated on promoting unacceptably damaging levels of growth with an unspoken assumption that 'growth was good'. There was some confusion about the relationship between the 'business as usual' forecast and the enhanced forecasts derived from the evidence base and a perceived lack of clarity in the commentary, making an informed response difficult.

Summaries of Specific Comments

Of the supporters of option **JT1**, the following issues were raised:

1. Option JT1 was seen to be consistent with achieving the City Deal projections. It was strongly supported by the *New Anglia LEP* as co-signatory of the City Deal, and many others.
2. A significant and ambitious scale of job growth was considered necessary for the area to be competitive and attract sufficient investment in a rapidly changing global economy. Cities need a critical mass of people to be self-sustaining and support the services and infrastructure necessary for sustainable urban living and allow business to benefit from economies of scale. To this end a higher target population for Greater Norwich of at least 500,000 is reasonable. The 'business as usual' option would be unlikely to be ambitious enough to meet future challenges, these include re-engineering unsustainable and resource inefficient lifestyles toward more sustainable and healthy choices and tackling the inevitable impacts of climate change.
3. The *Diss and District Neighbourhood Plan Steering Group* felt that some flexibility in employment growth provision was required to respond to a potential post-Brexit recovery and re-balance growth to areas better placed to deliver it and away from areas with potential viability constraints. Some felt that the benefits of enhanced growth should be spread more widely so as not to over-advantage Norwich.
4. *Indigo Planning* felt that an ambitious jobs growth target in the emerging local plan was well evidenced by predictions in the GVA employment, retail and town centres study. This would encourage local businesses to expand and might attract businesses from outside of the Greater Norwich area to locate here – a strategy that can only help boost the local and regional economy.
5. *Persimmon Homes* strongly endorsed the favoured strategic growth option, referring to the support given in the draft NPPF for aspirational local plans. To ensure the deliverability of allocated sites, the distribution of growth should reflect not just the sustainability of the locations but also the locations where people want to live.
6. *Lanpro Services*, acting for a number of different clients, stated that an ambitious strategy which also respected existing key attributes of the area was essential to ensure a bright and prosperous future. The Greater Norwich Local Plan presented an opportunity to make the wider area a hub for investment, commercial activity and high-quality place making, which would be of benefit to all who live and work here.

7. *Pigeon Investments* considered that the local plan needed to have a positive approach to job growth. Norwich was often cited as having the potential to be within the top 10 fastest growing places in the UK in terms of Gross Value Added. To that end, option JT1 was supported, although the SHMA's exclusion of the City Deal from the plan's OAN figure was not. Rather, the local plan should be taken forward on the basis of the City Deal being delivered, and it made no sense to exclude the additional homes needed to support the Deal. To do so would run the risk of the local plan being found unsound.
8. *John Long Planning* also emphasised the need for an ambitious strategy reflecting the aspirations of the City Deal but felt that the local plan should provide a positive framework to allow for job growth and creation in villages, including support for people who want to work from home, by encouraging better broadband and telecommunication provision in rural areas.
9. *Armstrong Rigg Planning*, again representing a number of different clients, stressed the need for an ambitious and aspirational strategy to take forward the levels of growth promoted through the City Deal and confirmed by the aspirational growth scenario in the GVA study. The City Deal had already reaped benefits in enabling discounted borrowing and unlocking funding to deliver strategic infrastructural improvements such as the NDR and Long Stratton Bypass. Aspirational jobs growth and commensurate investment was vital to ensure that Norwich and its hinterland achieved its full potential. To this end an aspirational and ambitious approach to job creation and the growth of the local economy is paramount in the context of the Plan's overall strategy. Every element of the plan should be built on a foundation of aspirational economic growth – it should be an employment-led plan. This will require big decisions to be made in relation to setting housing targets.
10. *Taylor Wimpey* requested that the alignment between the jobs target and housing target is considered further. In principle the working age population within the Greater Norwich area should be sufficient to meet the proposed increase in the number of jobs, and those workers should have access to sufficient levels of housing within the Greater Norwich area in order to avoid a significant increase to levels of in-commuting.
11. *Code Development Planners* referred to the exciting economic opportunities emanating from a number of high productivity tech industries already developing momentum at the NRP and Norwich Airport and those which have established a firm and respected local base. In addition, the recent improvements to strategic infrastructure have delivered much greater opportunities for expansions and access to wider markets.
12. *The University of East Anglia* referred to the long-term vision and expansion of the UEA and NRP which would help to achieve the forecast jobs growth and additional growth outlined as part of option JT1.
13. A common theme was that employment across all sectors will need to be promoted rather than just in one sector; it was particularly important to promote green technologies and biotech, mixed skills opportunities fostering design and innovation, tax incentives to help Norwich stand out as a place to do business. Educational incentives were necessary to plug skills gaps and address the oversupply of people training in sectors where there are unlikely to be sufficient job opportunities (e.g. arts, textiles).

14. *Kimberley and Carleton Forehoe Parish Council* felt that job roles should be expanded especially in service sector such as social care, engineering, technology and tourism. Norwich might specialise in a particular area, for example the arts - the Sainsbury Centre and the Norwich Art School plus the Kings Centre etc. were mentioned.
15. *Thorpe St Andrew Town Council* and *Climate Hope Action in Norfolk* asked for more emphasis on promoting the green economy to ensure sustainable employment, the latter highlighting the need for climate change impacts to be fully addressed in order to guarantee success and prosperity. The area's ability to fulfil its jobs potential could be severely impacted if this were ignored.
16. *NHS Norwich CCG* argued for a policy link between planned development and the provision of key worker and affordable housing as part of any development plan. Growth in health employment is envisaged and ability to support this with access to housing resource supports the ability to attract and retain a skilled health workforce at a local, often rural level.
17. *Jarrold and Sons* and the *New Anglia LEP* were both strongly supportive of the high and ambitious growth option. It was considered important to signal such ambition and make the area attractive for capable people to work. Failure to do so might reinforce some of the prior prejudices around Norwich re lack of opportunities and lower ambition. This view was echoed by many who emphasised a need for the local economy to be strong and enterprising. The Greater Norwich area required fluidity and responsiveness to economic and political opportunities and ambitious growth was seen as necessary to exploit the area's future potential. The region's growth will accelerate, and anticipating the growth of employment, infrastructure and housing is all the more important given the time such projects have traditionally taken to deliver.
18. One respondent felt that the enhanced job growth option will only be achieved if the points made on taking a broader overview of the economic geography of the county i.e. to include the Cambridge Growth phenomenon / opportunity of Norwich extension to the Oxford to Cambridge rail corridor, and the caveats around maintaining and enhancing place competitiveness are recognised and acted upon. Another stated that [the document] needed to be more honest in regard to the east of the region where significant investment is needed beyond the NDR, e.g. the Acle Straight and the bottleneck coming into Yarmouth. It was also disingenuous to imply that a cycle path being an attractive commuting opportunity from Aylsham to Norwich when the Marriott's Way is 26 miles rather than 13 by road.
19. It is important that the GNLP puts pressure on Central Government to reverse many of the cuts inflicted on local government finance since 2010 with resultant impact on jobs and services. Investment from central government is vital to grow the economy and allow freedom for local authorities to borrow to develop it. This is essential to prevent the area from stagnating into a "retirement home".
20. Some concern was expressed that a high growth strategy would favour Norwich over other parts of the area and disadvantage lower skilled local residents. A common theme was that focussing on Norwich might not necessarily be the best approach for Norfolk or nationally. Community initiatives should be a larger, and more integrated, part of the overall approach, not just something to be encouraged as an afterthought. One respondent gave reluctant support only, because JT1 does not produce a large number of jobs for local residents who are currently in need,

- showing scepticism about the wisdom of continually sacrificing greenfield land to house “incomers” working in the high-value knowledge industries.
21. There was general disquiet about the impact an enhanced forecast might have on inward migration leading to competition in the housing market with local residents and pressure on infrastructure. Growth should be directed so as to support the area as a whole but in particular the rural areas and villages which tended to be most economically disadvantaged.
 22. The plan pays insufficient regard to the effect of the Cambridge-Norwich technology corridor. *Regional and City Airports* cited the recent report by Bruton Knowles: “The Economic Growth Potential of the A11 Corridor”, which identified potential to deliver 6,100 net additional jobs by 2031, of which at least 3,000 high value jobs would be in the agritech and environmental sciences sectors benefiting from the proximity of the UEA and a focus in and around the Norwich Research Park. These jobs should be taken into account in the forecast; the potential number of additional jobs should be nearer 48,000. A sufficient amount of suitable employment floorspace should be planned for to accommodate these jobs.
 23. *Weston Longville Parish Council* considered there was a need to provide employment opportunities before providing housing.
 24. *Sirius Planning* suggested that growth should not be restricted to villages with an existing range of services as this can result in over pressurising existing resources such as schools and healthcare. Consideration should be given to growth in locations which would provide sufficient economies of scale to enable new services to be provided; particularly if there are communities which are currently lacking such facilities.
 25. *Thorpe St Andrew Town Council* asked for more emphasis on promoting the green economy to ensure sustainable jobs.

Of the supporters of option JT2, the following issues were raised:

26. Many were sceptical about the City Deal, one respondent commenting on the absence of any “rural deal”, another stating that the City Deal would only be a favourable choice if it was focussed predominantly on brownfield sites. The City Deal would not deliver a thriving rural economy: It would not improve the lot of people at the bottom of the heap: It would increase demand for new housing on greenfield land adjacent to Norwich, to house incoming new residents taking the plum jobs. What the economic plan needs to do is discover a way to “sweep up and better employ those who are currently disenfranchised in one way or another”. There was general disquiet about the impact of an enhanced forecast on inward migration leading to competition with local residents for homes and jobs.
27. Many were unconvinced by JT1’s growth assumptions - one considered them “hopelessly optimistic and flawed” stating that estimates on jobs and housing are historically liable to error. It is difficult to predict what the working environment will look like [by 2036]. Need to understand the impacts of new technology, Brexit and US/international economic and trade policy and market/currency fluctuations which had not so far been part of the plan’s assumptions. Therefore, adhering to a particular artificial quota which produces a distorted housing plan does not seem

clever. People live in Norfolk for the lifestyle - which doesn't involve “concreting over all the green space”.

28. No evidence had been presented that additional growth has been achieved so far, with businesses such as Britvic moving away despite improved road links delivered by the A11, and the Broadland Business Park not attracting businesses from outside Norfolk. It would make more sense to have a model which built on the strategic strengths of Norfolk, and planning growth on this basis rather than diverting investment away into 'ego' led projects that evidence shows do not deliver the promised growth.
29. The *Wensum Valley Alliance* pointed to the population forecasts in the SHMA being driven largely by in-migration trends which would not be sustained unless the jobs were there to support them. One respondent, supporting the more modest growth evidenced by the EEFM, presented detailed arguments questioning the credibility of the enhanced growth scenario on the basis of recent monitoring of job growth through the AMR, the dubious reliance of the enhanced forecast on unproven assumptions about growth in high value sectors, the focus on targeting growth around Norwich and a small number of locations in the “central belt” and the impact this might have on commuting from elsewhere in the county, failure to fully exploit opportunities to co-locate homes with jobs and expand employment in the smaller towns and villages, especially through boosting the food and drink sector (as favoured by DEFRA); unsoundness of the assumption made in the SA that the baseline forecast would have a generally neutral impact; unsoundness of the assumption that the enhanced growth forecast would have a positive impact on deprivation; failure to exploit the potential of brownfield sites (e.g. Colman’s) over greenfield with respect to locating the Food Hub.
30. Some felt that growth if needed should be kept to a minimum and the business as usual forecast would be the lesser of two evils - “better safe than sorry”. There was suspicion at the assumption that growth was good, when this can be far from true. *Marlingford Parish Council* were concerned at the view that continuous building expansion was both necessary and desirable. This question with its pre-determined “favoured option” and “reasonable alternative” was “worryingly tendentious”. Others took the view that promoting growth without a clear end vision would simply result in business as usual anyway. One respondent felt that growth would be better targeted at areas of lowest employment such as Great Yarmouth and Lowestoft rather than directed at pressured areas already struggling to meet their infrastructure and housing needs.
31. There was little clarity as to how the 45,000 jobs were to be created. Some cynicism was expressed over the claims that the plan will promote environmental enhancement and improved quality of life when those ambitions were already negated by the environmental impact of the NDR. The Food Enterprise Zone was cited as an example of a pollution generating industrial estate masquerading as an environmentally beneficial resource – talk in this case not matching actions.
32. Many of the areas which are currently growing are doing so due to the attractions of the setting and environment. “Building homes and infrastructure all over the county” will spoil nature of why people want to live and work here, and an environment degraded by overdevelopment will fail to attract additional growth. On this theme, one respondent saw the likelihood of more “soulless housing estates”, increased car

use and congestion. *Wroxham Parish Council* echoed this view by stating that overdevelopment would further damage the rural character of the GNL area, whereas the *Wensum Valley Alliance* felt that the casual destruction of the rural environment and sacrificing farmland to homes in a climatically favourable area was a national disgrace in a country which cannot feed itself.

33. The scale of growth envisaged in option JT1 will have a dramatic and negative impact on the nature of Norwich and the surrounding area. Such excessive development and unrestrained growth would be bad for the environment, some also mentioning the need to restrain development to protect finite natural resources, conserve the water supply and mitigate against climate change. The significantly negative impacts of option JT1 on several key sustainability indicators as detailed in the interim SA (compared with the neutral impact on all indicators of option JT2) was highlighted. Aspirational and unrealistic job forecasts based on a position which is not “policy neutral” are cautioned against both by the NPPF and the Planning Officers Society, whereas the trend based and strongly evidenced business as usual forecast is clearly more responsive to local need.
34. There was some confusion at the relationship between 2014-based enhanced job growth forecasts as set out in the GVA study (44,000) and the 2015-based SHMA forecast of 45,390 on which the 45,000 favoured option is based, one respondent querying whether these two figures were intended to be added together to produce the enhanced forecast. There was also some concern about lack of detail on what kinds of jobs would be provided and where.
35. The *Wensum Valley Alliance* felt that a strategy focusing on enhancing existing employment areas to make them more attractive to employers would be of greater benefit.
36. *Costessey Town Council* noted that residents in smaller centres could find it difficult to travel by public transport from their homes to work. *Hope Community Church Wymondham* highlighted the A11 corridor as offering significant employment opportunity where people could work and live in the same town/area without the need for high levels of commuting.

Of the supporters of neither option, the following issues were raised.

37. Presenting two options only was unreasonable and will skew the results by forcing a choice between them. It is not a question of how many jobs, but what kind of jobs in what kind of industries. [The strategy is otherwise] just pandering to the whims of the market.
38. *Bidwells* considered option JT2 business as usual option unrealistic as it would not facilitate the uplift in employment growth set out in the City Deal. However the job growth assumptions in the SHMA underpinning the favoured option JT1 were also considered to be flawed since they assumed a return to trend based growth after 2026. In reality the longer term economic benefits of improved infrastructure, increased population requiring services and expansion of key industries especially around the Norwich Research Park (all consequent on the City Deal) will result in sustained higher growth rates in the longer term. The EEFM should be re-run to incorporate the uplift in employment resulting from the City Deal. National draft Planning Practice Guidance endorses this view, recommending that an appropriate employment uplift above historic trends should be applied when higher growth rates

are anticipated as a result of strategic level infrastructure investment and agreed growth funding (Page 26).

39. Neither option gave proper consideration of the impact of Brexit. Both options are predicated on economic conditions pre-Brexit. We need to plan for both job growth and decline since so much of our local trade depends upon Europe – to plan for growth only is a failure of foresight. In relation to housing needs the point was made that there should be more emphasis on meeting housing needs within the city rather than allowing the consequences of growth from the City Deal to fall on the Greater Norwich area, leading to more unsustainable commuting.

DRAFT

HOUSING NUMBERS

Question 4

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

A total of 187 separate responses were received to Question 4. Of these 71 replied Yes, 83 replied No and 23 did not explicitly choose either option but provided additional comments, some in support, some not and a small number of individuals stating that they did not have the necessary technical knowledge or expertise to venture an opinion.

Overview

Responses to question 4 on housing numbers were relatively evenly balanced, with 69 respondents agreeing with the consultation's basic housing need figure, the Objectively Assessed Need (OAN) for 2017-2036 of 39,000 homes, and 83 disagreeing.

Those supporting the figure argued that increased housebuilding is a Government priority, the population is growing, homes are unaffordable for many and significantly more homes are needed to meet social responsibilities and to support economic growth. Considerable support for using the Government's standard methodology for calculating the housing numbers was expressed. In particular, the Home Builders Federation support its use, together with the use of a 10% buffer and not including windfall in the calculation of requirement.

However, much of the support is tempered by additional comments e.g. housing allocations should be located in deliverable locations and the current strategy overly relies on large sites near the urban area and this should not be repeated. Highways England made the point that housing growth is likely to have a significant impact on the Strategic Road Network.

'No' responses included a majority who believe that the figure is too high. A common theme was that the estimate was wrong or not credible, many reflecting the CPRE's comments that the methodology was flawed, and existing allocations are sufficient for the next 24 years based on past delivery rates, so any additional allocations should be phased or kept in reserve and only brought forward if needed. Others disagreed with the methodology used, suggesting that it should not have an extra affordability element. It was also argued that CIL increases house prices, thus reducing affordability, which then creates the need for more houses to be built. Others suggested that better use should be made of the existing housing stock and empty homes should be brought back into use.

Other general comments were that house building would attract people from outside the area, population growth should be tackled and that the wrong type of homes could be built, with the primary need for more homes being for the young, the elderly and social housing rather than larger houses. It was also argued that new homes need to be in existing centres to protect the countryside and agriculture. A view that communities will become unbalanced was expressed, along with arguments that additional homes will be bought by investors and developer land-banking and excessive developers' profits will result. Other

arguments against new housing were that infrastructure will not be able to cope, there will not be enough jobs and Brexit will reduce the need for additional housing.

The alternative element of the 'No' responses was from those who argued that the need figure was too low. Many of these responses were from agents. Technical suggestions were that evidence from the SHMA rather than the Government's draft Standard Methodology should be used for now, and the OAN figure should not be rebased to 2017. It was also argued that the City Deal figures should be added in, giving a higher need. There was a reminder that the OAN is a minimum and it was suggested that the figure should be higher in order for the plan to achieve a 5 Year Housing Land Supply (5YHLS), with a specific point that there should be a mix of site sizes. Many of the comments appeared to relate to the promotion of particular sites, and a small number of locations were specifically mentioned as being appropriate to help delivery (e.g. Wymondham and Wroxham).

Summaries of Specific Comments

Of those who **agreed the figure was about right**, the following points were made:

1. That's what the evidence suggests; it seems a reasonable assessment based on the figures provided; it has been objectively assessed; it might be around 39,000 homes are required; the methodology seems reasonable and unlikely to be wrong, previous numbers were over-egged and the SHMA process has "sorted it out"; 7,200 new housing demand 2026-36 "seems fine". Some reluctantly agreed given that jobs growth benefits for "bottom of the pile residents" were only likely to spin-off the City Deal based strategy of importing high grade jobs and requiring more greenfield land for housing. A realistic target is needed to conform to Government guidelines. It is, effectively, Government mandated; it looks like a consensus number between Norwich and the Government.

Of those who **considered the figure was too high**, the following points were made:

2. It is an overestimation of need; figure is plucked out of the air; it was not credible; the need is unproven; many of the assumptions will be wrong as has happened in the past; short on evidence; where all these additional persons are is a mystery to me, it is not justified by existing demand or local birth rates, is it from mass immigration? It seems like predict and provide; allocated sites are not being taken up; if need was there would not have large numbers of consented sites; as developers have failed to deliver sites adding more will risk a gross over-estimate of what is required; large number of sites with planning permission already available, so no further permissions until these are developed to discourage land-banking; it will take 24 years to use up existing allocations.
3. It takes no account of empty homes, second homes, and planning permission not built yet, and use it or lose it legislation may significantly increase take up of existing permissions. Where is the need for new sites and affordable homes? There is no point allowing homes to be built that people cannot afford to buy, house prices will impact on sales. Developments attract people from outside the area leading to infrastructure shortages. When will obsession with numbers and growth end; why is demand management never addressed.
4. The calculation is incorrect, it is requirements not need, based on circular logic predetermined by wild aspiration on jobs. The relationship between the housing

numbers and target for jobs is flawed, more homes have been provided than jobs. This seems a huge amount of development, it also seems inconceivable that this could be so wrong that a buffer of 10% or additional windfall development could even be contemplated.

5. Windfall should be included in calculating need. The SHMA gives a population increase of 62,000 which produces a figure of 31,380 dwellings, and after deducting windfalls of 5,067 and adding 2% for market signals, the need figure is 26,839, and as there is already 35,700 allocated this gives a buffer of 8,861. It is based on an excessive growth forecast; it is only a guesstimate; it is too many for the area and will not deliver sustainable growth as defined by the NPPF.
6. The Government figures lack credibility because economy has declined; 39,000 is horrifying, it is not sustainable; the OAN has no proper basis in census figures; the data is out-of-date, the economy has changed and so predictions are too high; Brexit will mean lower need; constraints, such as environmental or infrastructure considerations, should be applied to the OAN. The Government's adjustment factor for affordability is flawed, it should use the average price of a two-bed starter property, not average house price. The cost of CIL has increased prices which is wrongly then used as a justification for more houses. No confidence in the Government predicting so far into the future. "We cannot eat houses" so should not build on agricultural and forested land any more than is essential.

Of those who **considered the figure was too high**, the following points were made:

7. Evidence suggests the [quoted] figure, but it is likely to be an underestimate if economy continues to grow and Norwich is seen as a great place to live and work.

General comments included:

8. Large-scale estates are not the answer; needs of populace are not met by housing market which places profits above needs; developers will only develop if they can make a profit; developers squash in too many houses; cap or reduce developer's profits; developers cynically manipulate the system to reduce their obligations. Local authorities should put more effort into bringing forward development; there appears to be an assumption that it is impossible to engage in housebuilding e.g. direct build or ensuring a mix of properties that reflect the need (e.g. smaller households). There is a need to tackle population growth; where are people coming from? The quality of life is decreasing with massive developments; do not allow Norfolk to be ruined by excessive growth and suburban housing; the character of the beautiful city of Norwich will be ruined; there are already environmental/amenity/quality of life impacts, how much worse will they be with growth?
9. There is a need to do something about noise and anti-social behaviour to encourage urban living; compulsory purchase all nightclubs on Prince of Wales Road and convert to flats. The present system of large developments will not reduce housing costs and so not meet the need, there needs to be up to 40% local authority housing. There is no indication whether the housing will be affordable, actual numbers are meaningless unless people can afford to buy or rent. Second homes should be available in the plan to provide homes. Unless infrastructure and economy needs are met it will lead to imbalanced communities with an ageing population. Estimates are notoriously

inaccurate, and more so with changes in work-based technology, e.g. working from home. It is disingenuous not to protect land that is not threatened by housebuilding for many years.

10. If you want an uplift put it transparently in the GNLP, not sneaking in unspecified numbers. We should be encouraging better use of existing stock, rather than building new continually. New sites should be phased after existing allocations (including empty homes and suitable brownfield sites) are used and would then be available for development if building rates increase, but if rates remain at existing rates they could stay on a reserve list and so protect the countryside. Development should be taken step by step. The actual problem of very high population growth is not addressed. Recently a building plot for houses was bought by the Co-op for a shop – how is this happening if houses are so needed? There is no housing crisis outside London and Cambridge, only an affordability crisis; the 42,000 homes need to be Council homes and not be a greater choice of “noddy boxes” for those already on the property ladder.
11. Increased supply will not bring down prices, it will drive up land prices. The current target has not been met through the standard housebuilding process and presently there is an excess of planning permissions, the causes of this should be understood and to build out sites before moving on to new allocations. The beneficiaries are the Government, local councils with extra rates income, local landowners and builders, but not local residents who will suffer from extra pressure on infrastructure.
12. There will be huge unnecessary increases in traffic e.g. Drayton /Taverham; western link of NDR should be completed before growth; massive investment in infrastructure needed, otherwise will be environmental damage. There should be more emphasis on new towns and cities. Where will the occupants of new houses find employment, the once large manufacturing base of Norwich has shrunk to a small number of businesses and Aviva has reduced in recent years. We may be left with oversupply of housing with consequent problems evident in the North of England, where there has been significant numbers of properties unwanted, unmaintained and semi-derelict e.g. Stoke on Trent.
13. Other comments related to the type or location of development: do not build on flood plains; do not build close to airport; developments do not include sufficient affordable housing; smaller, higher density units are needed in existing centres not spread through countryside in order to justify the NNDR; need a lower figure based on local housing need through social and low-cost housing; focus on smaller homes and social / private rented sector; affordable housing is a priority. Most people accept small numbers of well-built homes, well situated and sensitive to locality, with a good mix of house types, but this is not what happens; too many are bought by investors and people moving to release cash.
14. The Sustainability Appraisal assumptions on housing (section 7.4) were questioned. Sustainability on numbers and location should be assessed together; higher numbers in better locations may be more sustainable than lower numbers in inappropriate locations.
15. Support expressed that “the strategy will deliver the housing that is needed” and this will go a long way to support housing growth in all towns and villages with a range of services. Support inclusion of additional sites to give a buffer to tackle the housing shortage and support economic growth. Paragraph 4.15 refers to wrong NPPF

paragraph, it should be 14. The principle of using the Government's standard methodology is welcomed. However, this should be the minimum starting point in establishing the need figure for the plan. The rebasing of the housing figure to 2017 (para 4.17) is not justified, it should be from 2016 which is used by the Government, increasing the OAN to 41,040 as a minimum. Further adjustments may be required to take account of affordability ratios or updated household projections, perhaps giving a higher need figure.

16. *Broadland Housing Association and Norwich Business Improvement District*: agreed with the figure.
17. The *Broads Authority* considered the figures in Paragraph 4.19 were unclear and requested better presentation with a table or bullet points.
18. The *Campaign to Protect Rural England (CPRE)* raised serious concerns about the methodology, especially given the introduction of the affordability equation, which has a number of flaws. 36,000 existing commitments is more than enough for the likely delivery rates; taking more than 24 years. Because of this, phasing should be used, which would meet the Prime Ministers objectives in speech of 5/3/2018 for permissions to be built out before new permissions were granted. The phased sites would be available if building rates increase, but if not would stay on a reserve list and valuable countryside would be protected. Lack of reference to phasing as an option is a serious omission.
19. *Diss and District Neighbourhood Plan Steering Group* agreed, subject to it reflecting the revised MHCLG model / formula and is deliverable within that timeframe.
20. *Highways England* acknowledge the need for up to 45,000 jobs by 2036. This is likely to have a significant impact on the Strategic Road Network. It is unclear how many of these are additional to those in the JCS; this should be clarified. The outcome of the Government's standard methodology should be understood when finalised and, if adopted, incorporated into future OAN calculations.
21. *Home Builders Federation* do not disagree with the use of the Government's standard methodology. This is a pragmatic decision and ensures that the council is able to respond to the clear signals from Government regarding the importance of meeting current housing needs, addressing any back log and improving affordability across the country. We also support the proposal to allocate sufficient land to deliver 10% above the identified housing requirement of 39,000 homes and not to include windfall within the 39,000 homes, this recognises that windfall rates cannot be forecasted accurately and should be seen as a bonus rather than a form of delivery that can be relied upon to meet any gaps between allocated sites and housing needs.
22. *Liberal Democrat City Council Group* agree with the CPRE submission that existing sites should be developed before any new sites, that are likely to be added into the emerging GNLP are built on. Any new sites being introduced for housing should be treated as phased development and should not be built on until the current JCS sites have been used up. There is enough land allocated in the JCS to cater for housing need for next 20 years.
23. *New Anglia LEP*: support the number of homes needed to support the economic growth potential of the area.
24. *Norwich Green Party*: This is based on standard Government methodology so unable to comment (but have comments on how OAN recognised in the plan elsewhere).

25. *UEA Students Union*: modelling should take into account changing face of young person's accommodation. For many graduates and young people a HMO is the only option. Targets should be set for lower cost, quality shared housing for young people. There will be a "brain-drain" from Norwich if there is not adequate low cost / starter homes. Also, concerns about homelessness which should be included in the plan.
26. *Wensum Valley Alliance*: OAN appears "a jelly for manipulation" and uses potential job creation as a driver. Sites have been allocated but delivery remains low, not because of planning restrictions but because Norfolk has a low wage economy and house prices are beyond reach of young people. Numbers for affordable homes are reduced through viability assessments e.g. at Rackheath where target of 33% has reduced to 10%. So the housing mix of the SHMA is also skewed. With Brexit and lower population increases demand will continue to be controlled by the market and not need. The real need is for much of the planned development to be social housing. One cannot see the target of 2,000 homes p.a. being achieved and we follow CPRE argument that allocated sites should be delivered before more greenfield.
27. *Bramerton Parish Council*: submitted 2 responses, one agreeing and one disagreeing.
28. *Brundall, Costessey, Dickleburgh and Rushall, Drayton, Great and Little Plumstead, Hellesdon and Little Melton Parish Councils* agree.
29. *Bergh Apton Parish Council*: consider there is no reason why new sites allocated in the GNLP should not be phased.
30. *Burston and Shimpling Parish Council*: agree if that is what is used to calculate the requirement.
31. *Colney Parish Council*: The LEP's Strategic Economic Plan, referred to in the Norfolk Strategic Framework, sets excessively ambitious targets. Based on LEP projections Norfolk will require 84,000 new homes, this increase is driven by net inward migration and an ageing population. But much depends on a buoyant property market which should be monitored at least on a 5 year rolling basis. OAN is based on projections that may not be achieved. There should be a 5 yearly consultative update. The only real housing shortage in Norfolk is for low cost council homes and affordable homes, whereas most developments are unaffordable for young people. There are already thousands of permissions for new homes, where 70% will be unaffordable for many local people. Suspicious that delays to building are in order to manipulate house prices and increase profits. If this is not addressed by national policies then it is impossible for the growth targets, and provision of the affordable component, to be met. The creation of the GNLP has eroded democracy, nowadays development appears to be decided by the 4 councils and the LEP, not local committees. Effectively, there is a quango deciding on a major strategy that affects local people. The LEP is an unelected pressure group representing developers, businesses and construction, in competition with other LEPs across the country. It is unreasonable to expect that all the LEP targets will be achievable. The PC conclude that no new planning permissions should be given until existing permissions are built; land banking and call for sites proposals should be stopped until both growth targets are verified and quotas for affordability, agreed by citizen and planners working together, and set out in the GNLP.
32. *Cringleford Parish Council*: the figures are contested, as they are based upon outdated assumptions and thus may be too high.

33. *Framingham Earl Parish Council*: at present building rates it will be 2041 before 39,000 homes are built. Current allocations should be phased in before new sites are considered. The extra 7,200 homes would not be available until around 2046, not taking into account any commercial downturns that would affect the housing market.
34. *Hainford Parish Council*: we do not know that the methodology is accurate.
35. *Hempnall Parish Council*: it is out of kilter with the workings of the housing market which clearly show the need is far less. At existing build out rates it will take 24 years to use up existing permissions; therefore development on new sites is opposed until majority of existing ones are built.
36. *Kimberley and Carleton Forehoe Parish Council*: 39,000 homes is excessive and unsustainable. If they are really required the current housing development models are not fit for purpose. This is bolted onto existing small towns, overwhelming them with poor quality housing with no infrastructure provision (roads schools, doctors oversubscribed). 2,000 homes a year cannot be absorbed into a rural county, it will have unforeseen consequences.
37. *Marlingford and Colton Parish Council*: Although the calculation on which the OAN is based appears reasonable, there was already an existing commitment for 35,665 houses. As the average house-building rate within the plan area during 2001-2016 was 1,537 per annum, and this appears likely to continue, it will take almost 24 years before the existing allocation is used up. In these circumstances the PC believes that any new sites allocated in the GNLP should be phased. This would make them available for development should building rates increase significantly, but if house completions continue at or near current rates these sites should remain on a reserve list to protect valuable countryside. If the new sites are not phased developers would be likely to cherry-pick the more attractive rural sites while continuing to land-bank others allocated in the JCS. Therefore, there is a very real danger that green fields would be lost at a much greater rate.
38. *Reepham Town Council*: the OAN methodology is not disputed, but the failure of developers to deliver the existing JCS allocations should be recognised. Adding additional GNLP allocations risks over allocation and allows developers to cherry pick the sites most likely to improve their commercial performance at the expense of community benefit. Also, Brexit may lead to a reduction in need and this should be recognised in the strategy.
39. *Salhouse Parish Council*: agree in principle, depending on the qualification of speculative numbers.
40. *Scole Parish Council*: Yes, if that is what is used to calculate the requirement. It does not seem much different from the previous calculation.
41. *Thurton Parish Council*: accept the logic of the OAN but on the current housing building rate it will take 24 years to use up existing allocations. Therefore, any new allocated sites should be phased / held on a reserve list until building rates increase, and so valuable countryside would be protected. Otherwise developers will continue to cherry-pick the more attractive rural sites and land bank the JCS allocations.
42. *Weston Longville Parish Council*: the allocations from previous plans have not yet been used up which would suggest that there was an over-estimation of the demands.
43. *CODE Development Planners Ltd on behalf of Ben Burgess and Drayton Farms Ltd*: The plan should seek to provide for the full OAN with appropriate buffers applied to ensure a sustainable and regular delivery of homes. Although the provision of around

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

44. *Bidwells*: The period covered for housing should be the same as for jobs i.e. 2015 to 2036. Then the OAN would be 39,846 according to the SHMA. Also, the new standard methodology should reflect this. The Government's proposal had flaws and may change. With 2015 base date the OAN would be 39,840 or 43,638 if use new methodology. The effects of the City Deal on jobs should be added in, giving total OAN of 47,847 dwellings. The new methodology is not intended to stymie investment and the calculated Local Housing Need can be higher than the calculation, therefore it is reasonable to use the OAN of 47,847, though this should be provisional subject to further economic modelling.
45. *Carter Jonas LLP* on their own behalf and on behalf of *Taylor Wimpey* and *Martin Skidmore*: the objectively assessed housing need figure of 39,000 dwellings between 2017 and 2036 will need to be subject to adjustments to reflect the outcome of the standard methodology, the duty to cooperate process, the housing distribution between neighbouring authorities, and economic factors. [The representation on behalf of clients specifies in addition that the economic factors should include those associated with the Greater Norwich City Deal.
46. *Lanpro Services Ltd* (on their own behalf and on behalf of *Dennis Jeans Properties*, *Silfield Ltd*, *Glavenhill Strategic Land*, *MAHB Capital* and *Nigel Hannant*): The housing requirement of 7,200 is too low. The original call for sites consultation suggested around 12,000. The standard methodology is still at consultation stage and has been subject to a number of objections, and its use is not supported until it has been put into practice. One of its failings is that it does not consider economic objectives, and it is based on figures for 2016-2026, rather than the period 2017-2036 used in the GNLP. The OAN should be the starting point, with more added for economic objectives e.g. the City Deal. Furthermore, para 158 of the NPPF requires that Local Plans ensure that strategies for housing and employment set out in their plans are integrated and take full account of relevant market and economic signals. Not to include the City Deal requirements would be a failure to meet this requirement. Including an element for the City Deal plus a 20% buffer would give a new homes requirement of 14,021. The Growth Options Document is unclear about the proposed base date of the plan and once the OAN methodology is confirmed this should be clarified. Rebasing the start date of the Local Plan to 2017, should not be used as an excuse to reduce previous backlog. Both methodologies are set to different plan start dates, but both are intended to take into account previous backlog in assessing the housing requirement going forward. Also the deliverability of some of the existing 35,665 commitments may be questionable and further consideration should be given to this to ensure a robust figure is used in the calculation of the housing requirement.
(Lanpro's representations on behalf of *Silfield Ltd* and *Glavenhill* additionally give broad support to Growth Option 3 to support the Cambridge – Norwich hi-tech corridor; their representation on behalf of *MAHB Capital* suggests that the plan's

housing requirement from 2017-2036 should fall within the range 11,000-14,000, the lower figure being evidenced by the SHMA).

47. *Gladman Developments*: ONS will be publishing the 2016 SNPP (subnational population projections) later this year which will likely alter the level of housing needed over the plan period. Gladman therefore reserve the right to comment on this matter at a later date.
48. *Harvey and Co*: broadly acknowledge the methodology adopted for the calculation of housing numbers.
49. *Indigo Planning*: The OAN is based on the most up to date methodology and should therefore be an accurate calculation of the Greater Norwich area's housing need. The UK population is growing and there has been a significant undersupply of housing across the UK over the past few decades. Councils' have a social responsibility to facilitate the delivery of housing, based on accurate and up to date evidence. Growth is happening in the area. Local policy should support continued growth by increasing the level of housing.
50. *Barton Willmore* on behalf of *Landform Estates Ltd*: Landform have not undertaken a review of OAN in the area; however, it is noted that the OAN should be based on the Government's proposed new standard methodology.
51. *Barton Willmore* on behalf of *Landowners Group Ltd* and *Trustees of JM Greetham No2 Settlement*: Agree. 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).
52. *Barton Willmore* on behalf of *Norwich International Airport*: Regional and City Airports supports this option as it complies with the evidence that GNDP has at its disposal, namely the East of England Forecasting Model (EEFM) and the impact of the Greater Norwich City Deal. However, GNDP has not considered the number of jobs that will be created due to the Cambridge Norwich Technology Corridor. The Study, Delivering the Economic Growth Potential of the A11 Corridor, undertaken by Bruton Knowles, highlighted the potential for the Corridor to deliver 6,100 net additional jobs by 2031, of which at least 3,000 high value jobs would be in the agritech and environmental sciences sectors. These sectors benefit from the University of East Anglia (UEA) and are situated in the Norwich Research Park, in the Greater Norwich Area. The 3,000 jobs should be taken into account when forecasting the potential jobs growth over the plan period. Therefore, the potential number of additional jobs should be nearer to 48,000. Therefore, there needs to be a sufficient amount of suitable employment floorspace, of all use classes, to accommodate these new additional jobs.
53. *John Long Planning* on behalf of *Otley Properties*: Disagree that the OAN is 39,000. It does not take into account housing needed to support the City Deal ambitions, or provide a sufficient delivery buffer, or opportunities from infrastructure improvements. It also limits the opportunity for rural areas to grow by placing an artificially low cap on housing numbers. The SHMA 2017 acknowledges that the Norwich housing market stretches beyond the Norwich Policy Area into rural areas. The rural areas can provide for a significant number of homes to support the growth of Norwich, and strategic employment sites, including the City Deal job growth ambitions. Many towns and villages in the rural areas are sustainable in their own

right, and additional housing growth in the villages will help them to thrive and flourish, and support nearby and surrounding rural areas. The SHMA OAN excludes the homes needed to support the City Deal. The City Deal is a key economic objective and should be included in the figures. Failure to do so runs the risk of the Plan being found unsound, and the potential under delivery of homes could prejudice the securing of Government funding. It is suggested that the OAN is re-run based on the final standard methodology, and the City Deal requirement included based on up-to-date information.

54. *Armstrong Rigg Planning* on behalf of *Orbit Homes* and *Oxygen Real Estate Group*: the adoption of the Government's standard methodology is welcomed. It sets out to simplify the way baseline housing requirements are calculated by only taking into account past growth trends and resultant affordability issues. It does not seek to identify when future growth may be above past trends, but does state that uplifts will be appropriate "where growth strategies are in place, strategic level infrastructure improvements are planned, funding is in place to promote and facilitate growth". Therefore, a City Deal uplift should be applied to meet the growth aspirations. Not accommodating for the employment growth will push up housing demand and impact adversely on affordability, which will push up the baseline OAN when the plan is reviewed in 5 years' time. As an absolute minimum, the housing target should be 47,349 (standard methodology OAN plus City Deal uplift) this would negate the need for an additional 10% buffer. This would give a residual requirement of 11,684 (rounded to 11,700).
55. *Armstrong Rigg Planning* on behalf of *Saltcarr Farms Ltd*: it is noted that the Greater Norwich Area will be strongly influenced by the City Deal which promises a strategic infrastructure programme, and the facilitation of 13,000 additional jobs resulting in an additional requirement of 8,500 homes. The GNLP will be the main vehicle to achieve this growth. Currently the Plan has used the Government's standard methodology for calculating OAN. This gives an initial requirement of 38,988 and adding a 10% buffer gives a proposed OAN of 42,887. However: firstly, the Government's current standardised approach seeks to provide for a minimum housing requirement; secondly, it only provides an in-built uplift to cater for issues relating to affordability – it does not recognise other external influences such as the delivery of strategic infrastructure or aspirational jobs growth. It effectively represents a 'policy off' figure. Therefore the GNLP should include a housing requirement that factors in the impact the jobs growth planned as part of the City Deal would have on housing demand. As an absolute minimum, the housing target should be 47,349 (standard methodology OAN plus City Deal uplift) this would negate the need for an additional 10% buffer. This would give a residual requirement of 11,684 (rounded to 11,700).
56. *Armstrong Rigg Planning* on behalf of *Westmere Homes*: support the use of the Government's standard methodology but object to use of market signals uplift as meeting need for additional homes needed under the City Deal. This will exasperate (sic) the matters relating to affordability that the standard methodology seeks to alleviate. It is recommended that the City Deal requirement be in addition to base OAN giving a requirement of at least 47,349 homes and residual requirement of 11,700. As the uplift under standard methodology is to allow for market choice there is no need to include a further 10% buffer. Due to high levels of uncertainty windfalls should not be included. The assertion that "uplifts are not cumulative" is challenged,

this statement sidesteps major issues relating to future demand for housing. It fails to grasp the crux of what the Government are seeking to achieve. The figure is based on natural rates of household formation and affordability; it is a minimum requirement that does not include need brought about by trends such as relating to increased employment or infrastructure. The draft PPG describes the matter: “The need figure generated by the standard method should be considered as the minimum starting point in establishing a need figure for the purposes of plan production. The method relies on past growth trends and therefore does not include specific uplift to account for factors that could affect those trends in the future. Where it is likely that additional growth (above historic trends identified by household projections) will occur over the plan period, an appropriate uplift may be applied to produce a higher need figure that reflects that anticipated growth. Circumstances where an uplift will be appropriate include, but are not limited to; where growth strategies are in place, strategic level infrastructure improvements are planned, funding is in place to promote and facilitate growth (i.e. Housing Deals, Housing Infrastructure Fund)”. It would be irresponsible not to plan for the City Deal uplift. This would exacerbate affordability issues, particularly in the more desirable rural areas. An influx of higher paid workers would further distort the housing market, increasing the already high affordability ratios in the area. Demand created by drivers such as aspirational economic growth must be included on top of the identified OAN to ensure that the rise in local house prices is tempered. Paragraph 2.3.38 of the Interim Sustainability Appraisal warns that economic growth could be restricted without land use policies that support housing and infrastructure needs. A full ‘policy on’ approach that seeks to deliver the additional 8,361 home requirement generated by the City Deal is essential to avoid the escalation of house prices and stifling of the current buoyant local economy. This would be entirely in accordance with the preferred option JT1 set out in the consultation document’s summary of Q3. It is recommended that the homes target should be 47,349 (standard methodology 38,988 plus City Deal uplift 8,361). But an additional 10% buffer is not needed. This gives a residual requirement of 11,684 homes. Meeting this need should be planned with a high degree of certainty, through a range of deliverable and developable allocations, so windfall sites should not be included.

57. *DHA Planning on behalf of Pelham (South Wymondham) Ltd*: the allocation of land at south Wymondham would assist in the strategic delivery of the homes and commercial space needed. An overall target of 43,000 homes is supported. However, attention needs to be paid to how the standard methodology has altered the housing need within the respective plan areas; e.g. 45% of the overall housing needed is directly related to the South Norfolk area, with 30% towards Norwich and 25% to Broadland. Whilst there can be a degree of flexibility, emphasis must be on meeting need in the right locations, with the greatest need in South Norfolk. Of the residual need, approximately 3,250 should be in South Norfolk, 2,166 in Norwich and 1,805 in Broadland. Also, these should be minimum targets and greater levels accommodated if possible in a sustainable manner. The supply of new homes can often be best achieved through larger scale development, such as new settlements or extensions to existing villages. Therefore, the expansion of Wymondham should be supported in line with this principle established by para 52 of the NPPF (and draft NPPF para 73); plan-making should identify suitable opportunities for development to help meet identified

needs in a sustainable way, considering the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains. The ability to provide a minimum of 1,375 new homes on our client's land at Wymondham would deliver a substantial amount of social and physical infrastructure improvements that cannot be achieved by spreading smaller levels of growth among more settlements. In addition, it is agreed that windfall should not be included in the housing target; as plans must be able to rapidly respond to change and contain mechanisms in the control of the planning authority, hoping that windfall sites come forward does not meet this and is unsound.

58. *Persimmon Homes*: use of Government's standard methodology is appropriate and at the current time the most certain approach to ensuring the GNLP is sound.
59. *Pigeon Investment Management Ltd*: the OAN of 39,000 is too low as it does not take into account the City Deal growth ambitions or provide a sufficient delivery buffer. An increased target could take account of opportunities brought about by infrastructure improvements. By the time that the Local Plan is adopted, the OAN will be over 3 years old, and based on data/information that is even older. Failing to include the City Deal housing numbers will result in under delivery of homes, could prejudice the ability to secure Government funding, and runs the risk of the Plan being found unsound. It is suggested that the final standard methodology should be used, plus the City Deal requirement based on up-to-date information. It will need refreshing at regular intervals up to submission of the Plan. If not there will not be a sufficiently robust strategy and it will run the risk of being found unsound.
60. *Wood Plc*: the OAN is only part of the requirement. Given that the Councils in the GNLP area have failed to meet development targets, there will need to be a fundamental change to housing delivery to increase supply. This could be achieved through the allocation of a range of sites, including medium sized sites of around 100 dwellings in sustainable locations (such as Wroxham) which provide a more responsive and deliverable supply. Evidence suggests that there is significant upward pressure on housing need which the GNLP will need to address beyond the OAN. The Government's standard methodology indicates a significantly greater need for Broadland than the SHMA, equating to 10,560 dwellings to 2036. The spatial distribution included in the GNLP will need to respond to the significant need in Broadland. To boost significantly the supply of housing there needs to be a step change in housing delivery. The level of delivery of new homes in recent years remains considerably below target. In the last 5 year period there was an under supply in the Greater Norwich area of 3,184 dwellings, in part due to over reliance on strategic sites in the urban area. The Norwich Policy Area does not have a 5year housing land supply. Unless a 5 YLS can be provided the new GNLP would be immediately out-of-date on adoption. To significantly boost housing supply the Plan will need to adopt a higher rate of growth and allocate additional sites. The housing implications of the City Deal also need to be taken into account. The GNLP needs to allocate more deliverable sites to boost delivery quickly and maintain a rolling land supply to better respond to housing needs; this should be a need figure of at least 40,700 dwellings (OAN plus City Deal) plus 10% buffer to give a target of at least 42,900 dwellings. The Plan should allocate a mix of sites, including alternative medium sized options (of around 100 dwellings) in sustainable settlements such as

Wroxham. This will provide flexibility in supply and allow the Council to respond more quickly to fluctuations in delivery than the approach set out in the current Local Plans.

61. *Woods Hardwick Planning*: We agree that the OAN for 2017-2036 is around 39,000 homes. However, the persistent patterns of under delivery in the GNLP area of both market and affordable housing targets and an over reliance on large strategic allocations in the urban area does not provide a positive framework to plan for future needs.

DRAFT

Question 5

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

A total of 153 separate responses were received to Question 4. Of these 49 replied Yes, 99 replied No and the remainder did not specify an option, providing additional comments.

Overview

Those responding 'Yes' generally reflected a pragmatic approach that some developments, most particularly larger ones, might not happen or may be delayed, so there needed to be an allowance for this through a delivery buffer. Other points raised included that the OAN was an underestimate, demand for housing will increase so a buffer will be needed, and that more homes are needed for young people. A number of comments were qualified, stating there should be a review of existing allocations and any buffer should be part of a phased approach which should only be used if necessary. NHS England suggested that there would be a need for improved liaison and any changes to trajectories communicated to the health sector to ensure that health provision could be planned for.

A large number of the 'No' comments were aimed at keeping the housing requirement down. A number of arguments were provided for this, including: land should be protected; a buffer is not needed; the original target figure is too high; the economy will decline because of Brexit; the OAN is inaccurate and the market will not meet this figure. Similar to some 'Yes' responses seeking to only use a buffer when necessary, there was a strong feeling that any buffer should be phased and only be brought forward if absolutely needed. Advantages expressed for this approach were that it would avoid 'cherry-picking' of sites by developers and encourage brownfield sites and existing sites to be developed first.

A number of agents argued that the buffer should be higher, with the Chelmsford Local Plan being given as an example of a 20% buffer being used. Arguments cited were that there is "persistent" under-delivery in the area; the need to accord with national policy; large sites take a long time to deliver; a City Deal element should be included and the interim Sustainability Appraisal refers to a buffer of at least 20%.

Also some comments reflected those of NHS England i.e. that a high buffer increases uncertainty for infrastructure providers. In particular, Highways England were concerned that a 10% buffer plus windfall (24% overall) would give a high level of uncertainty and make infrastructure planning difficult, with a potential impact on the Strategic Road Network.

Summaries of Specific Comments

Yes

1. *New Anglia LEP, Broadland Housing Association, Indigo Planning, Costessey Town Council and the following parish councils all answered **yes** to Question 5 without further comment: Bergh Apton, Brundall, Dickleburgh and Rushall, Hellesdon, Little Melton, Tivetshall.*

2. Of the other respondents who answered **yes** to question 5, the following points were made: See response to Q4; the OAN is likely to be an underestimate if Norwich continues to have a good economy, and be seen as great place to live and work; seems necessary should house building recover; buffer is sensible if really required, but building should not be implemented if not required; the buffer should be phased i.e. used after all existing identified land is developed; it will be needed unless Government puts in place measures (e.g. fiscal penalties) to prevent developers sitting on permissions / creating a land supply shortage; 10% buffer is generous, but development should be focussed on brownfield land first and the delivery of existing permissions; it is not necessary to increase the buffer to 24% by including windfall. But 10% of 39,000 is 3,900 not 7,200, and is arbitrary; ok as a starting point. Development should be phased. To create a robust local plan that supports the healthy and sustainable growth of the area. It enables the LPA to turn down inappropriate schemes.
3. *Diss and District Neighbourhood Plan Steering Group*: Yes. Even with government incentives and sanctions it is unlikely that the major developers will build out to the rates hoped for. Over allowance can provide for more rapid delivery of housing growth in areas that can support and sustain it in compensation for other areas where delays may be experienced due to viability issues or other reasons and ensure that the proceeds of growth can be more widely spread, rather than limited to the Norwich conurbation.
4. *Hope Community Church Wymondham*: Yes. Planned expansion will be better served than unplanned windfall sites, so to ensure that infrastructure is properly planned and provided for.
5. *Norwich Business Improvement District*: Yes. If we are to deliver the projected jobs growth this must be supported by infrastructure and housing to meet the needs of the growth. Therefore a 10% buffer provides additional space and growth potential. Existing consents should be built out before new ones granted to reduce land banking and price manipulation by developers. However, this does not evidence if this is realistic or achievable, merely an aspiration.
6. *NHS Norwich CCG*: Yes. Section 4.20 states that a delivery buffer is required as housing sites can take longer to come forward than expected. Whilst health and care partners do not have any issue with a delivery buffer in principle, there would be a requirement for the GNLP to have a clear line of engagement with the STP and health and care partners to ensure that delivery plans were communicated consistently and in a timely manner. This would allow health and care partners to plan for the additional population growth based on clear and up to date information and planning trajectories, with any changes clearly communicated to ensure that the delivery of health services is consistent with the population increases aligned to the peaks and surges of the housing development market, allowing health and care partners to take a proactive approach to planning current and future health and social care, particularly primary care.
7. *Burston and Shimpling Parish Council*: Yes. Seems a reasonable argument.
8. *Marlingford and Colton Parish Council*: Yes. This additional buffer allocation should be phased. We welcome the fact that windfalls will be counted towards the delivery buffer, but when these are added in, the buffer rises to 24%. This represents a 4% over-supply. 1,560 dwellings could be deducted from the housing allocation requirements on 7,200 dwellings.

9. *Scole Parish Council*: Yes. Large builders have historically been poor at maintaining the required build rate.
10. *Thorpe St Andrew Parish Council*: Yes. A flexible plan is required to support a growing economy and so there is sufficient housing stock which would enable first time buyers to get a foot on the market.
11. *Thurton Parish Council*: Yes. This additional buffer allocation should be phased. We welcome the fact that windfalls will be counted towards the delivery buffer, but when these are added in, the buffer rises to 24%. This represents a 4% over-supply. 1,560 dwellings could be deducted from the housing allocation requirements on 7,200 dwellings.
12. *Jarrold and sons Ltd*: Yes, some sites take a long time to develop so needs to be more than enough opportunities for development.
13. *Barton Willmore on behalf of Landowners Group Ltd*: Yes. The GNLP proposes a 10% buffer, equating to a total of 3,899 dwellings, including an additional 1,700 dwellings 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. Section 4 confirms one of the key aims of the GNLP will be to drive economic growth by delivering an increase on forecast growth in jobs and productivity, reflecting the aims of the Greater Norwich City Deal. 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. This approach will help support delivery to achieve social and economic growth, provided that the distribution of these new allocations is appropriate.
14. *Otley Properties represented by John Long Planning*: Yes. The plan should provide for at least a 10% buffer and potentially up to a 15% delivery buffer, to be applied to the total housing requirement (including City Deal numbers) to take account of commitment lapsing/not coming forward/delays etc. The Plan should allocate 'new' sites sufficient to accommodate at least 13,550 to 15,750 new homes (dependent upon the buffer) to take account of the unmet need; City Deal growth; growth opportunities brought about by infrastructure upgrades (para 4.30 of the Growth Options document); under delivery of current and future commitment; opportunities in rural areas; potential changes in the OAN baseline (such as household projection changes); and to help ensure affordable housing delivery targets are met, on the basis that it is unlikely that all sites will be able to meet the affordable housing percentage requirement due to viability etc.
15. *Persimmon Homes (Anglia Region)*: Yes. The draft NPPF states that the standard method for calculating local housing needs should be a minimum number of homes. The Government's objective is to significantly boost the supply of homes. Therefore, a minimum 10% delivery buffer should be included to promote choice and flexibility and to safeguard against any lack of delivery of allocated sites. The proposed housing allocation requirement of 7,200 dwellings is based on existing allocations being carried forwards into the GNLP. Where these allocations have not yet come forward for development there should be a thorough review of their deliverability. If there are uncertainties about their deliverability, a greater delivery buffer should be adopted. The track record of developers should be a strong consideration in selecting sites for allocation. Sites promoted by developers with a proven track record such as Persimmon

Homes should be given preference for allocation over those sites being promoted without the assurance of delivery from a committed developer. Persimmon Homes is one of the UK's leading housebuilders and has been committed to building homes in Norfolk for around 40 years; its Anglia region has been delivering an average of 700 dwellings a year across Norfolk and Suffolk. Its success led to a new operating company opening in Suffolk this year. The aim is to deliver 600+ new homes per year in Norfolk alone, a large proportion of which will be in Greater Norwich.

- 16. Wood Plc:** Yes. Hopkins Homes Ltd supports measures to boost housing supply and agrees that the Council's should respond to fluctuations in supply by applying a buffer in addition to the planned supply. Where there has been a record of persistent under delivery, as in the Greater Norwich Policy Area, the emerging guidance in the draft NPPF (Paragraph 74 point b) suggests that a 10% buffer should be applied where the local planning authority wishes to demonstrate a five year supply of deliverable sites and to account for any fluctuations in the market during that year. This may need to be increased to 20% if there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply. Although on face value it would appear from the Council's figures that there is sufficient supply to meet the Local Plan targets, across the GNLP area, there appears to have been persistent under delivery over recent years. This emphasises the need for a step change in housing delivery and to allocate more strategic sites in the GNLP area to maintain a rolling land supply and better respond to housing needs. The GNLP should include a housing trajectory which shows a positive position in significantly boosting housing supply in line with the emphasis of NPPF. In addition, the housing distribution should take account of the higher requirement. This will ensure the Plan's soundness and compliance with NPPF, particularly the need to provide flexibility and significantly boost housing supply.

No

- 17. Wroxham Parish Council and Orbit Homes represented by Armstrong Rigg Planning** answered **no** to question 5 without further comment, Orbit Homes referring to their separate response to Question 4

Of the other respondents who answered **no** to this question 5, the following points were made.

- 18.** See response to Q4. Land is a precious resource, should be careful about exceeding need "just in case"; sustainability; a buffer encourages new sites and the neglecting of brownfield sites. The buffer reflects idea that the economy will grow, but more likely it will contract under Brexit; existing planning permissions/allocations should be developed first; it will not assist in delivering existing sites, it will slow building; it will take 24 years for existing allocations to be used up. The predictions are likely to be an over-estimate; is just a figure plucked out of the air; the OAN is inaccurate and will not be met by the market, developers build at a rate the market can sustain; the figures are extremely questionable, some experts have concluded that the allocations greatly exceed the requirement. No more homes are necessary. Given that the housing target is already high - and windfalls are not included - 10% seems excessive. When windfalls are added in the buffer becomes 24%, this represents a 4% over-supply. Concentrate on delivery of the agreed number, not plan for failure. The existing number will be hard enough to deliver, adjust plans to what is do-able e.g. less homes. Should be buffer or

windfall, not both. Land should be protected against such extravagant margins of excess supply. Developers should not be encouraged to cherry pick from a larger number of sites; developers will pick the easiest / most profitable. A buffer will not encourage allocated sites to be developed in a timely manner. Developers should be required to build following planning approval. The satisfaction of needs is dependent on delivery, not targets. Increasing buffers merely means targets will be less likely to be met. Existing targets are not being met, therefore no point setting them even higher. Too many dwellings already, a buffer will push figure higher. There is a buffer of 8,861. The buffer should be phased / used in the later phases of the plan if needed. A 30 year land supply should be planned for, phased to meet demand / need. There is an arithmetical error – period should be 2026 to 2036, with requirement of 3,283 giving a buffer of 328 i.e. 3,611 in total, not 7200. Achieve higher density housing e.g. multi-storeys. The buffer percentage will probably depend on the size of developments. There is an increased risk of delay with larger developments. 10% is a significant number, those doing it should get figure right in the first place. A buffer will not be needed until existing allocations run out. Any shortfall could be made up by small scale windfall developments, this would allow monitoring of delivery and demand. There should be a debate about the size to which Norwich can grow and whether there are other options. Where is the buffer for agricultural land? The affordability adjustment should cover any buffer needed, particularly when there is a further 14% from windfall. Under the SHMA figures, the 10% buffer is not enough to meet the City Deal aspirations, 10 % should be applied to 41,040 giving 45,144 homes; this would provide for City Deal but is not sufficient to tackle the housing shortage. The Interim Sustainability Appraisal sets out that a delivery buffer of at least 20% should be used to minimise the risks of under delivery (though this includes windfall sites) but because of uncertainty of delivery windfall should not be included in the buffer (the Interim SA identifies that further research and fact finding is needed to confirm the sources of windfall housing, and therefore it cannot be reliable upon at this stage). Exclude the buffer, but include windfall, and call forward other sites if windfall do not happen at required rate.

19. *CPRE Norfolk*: No. We welcome the fact that windfalls will be counted towards the delivery buffer, but when windfalls are added in, the buffer rises to 24%. Therefore, even allowing for NPPF requirements, this figure represents a 4% over-supply, which could therefore be deducted from the housing allocation requirement of 7,200 homes. For the reasons stated in our answer to question 4, this additional buffer allocation should be phased.
20. *Highways England*: No. The GNLP also suggests that an estimated 5,600 dwellings could be provided during the plan period on 'windfall' sites, which are not currently allocated through the local plan. Some sections of the GNLP indicate that a windfall buffer of 10% will be identified (taking the dwellings total to 42,887), however the additional 5,600 dwellings would equate to a buffer of 24%. Highways England are concerned that this could result in a greater level of uncertainty regarding the potential location of housing development which could make it difficult to identify the potential need for appropriate transport infrastructure to support development and hence potentially result in an unacceptable impact on the SRN.
21. *Liberal Democratic City Council Group*: No. It will take almost 24 years before the existing allocation of 35,665 houses is used up. Therefore no good reason why new site allocations in the GNLP should not be phased.

22. *Norwich Green Party*: No. Support CPRE's suggestion of phasing the delivery of new housing allocations. At past average house-building rate it will take almost 24 years before the current commitment of 35,665 houses are fully built out. Any new sites allocated in the GNLP should be phased by being placed on a reserve list, only to be built out when most of the existing sites have been used, otherwise it will lead to developers 'cherry-picking' the most profitable sites and newly allocated green field sites developed first and even more land banking of currently allocated sites. If sites are phased / reserved they would be available for development should building rates increase, but if they do not increase the sites stay on a reserve list and valuable countryside would be protected.
23. *UEA Student's Union*: There is a need for a number of lower cost, accessible to young people accommodation options.
24. *Wensum Valley Alliance*. No. It is not required and artificially inflates numbers.
25. *Bramerton Parish Council*: No. A 10% buffer allows developers to develop more attractive sites and not necessarily those in areas where housing is needed, or that are difficult to develop. Existing sites should be utilised first.
26. *Cringleford Parish Council*: No. It is unnecessary. Developers with planning permission should be held to their obligation to build to them.
27. *Drayton Parish Council*: No. Windfall sites should be the buffer.
28. *Framingham Earl Parish Council*: If a 10% buffer is required, it should also be phased in after the original quota of 39,000 is completed. By having set the original targets for housing requirements high, it naturally means future targets will be high as they start from a high level.
29. *Great and Little Plumstead Parish Council*: The existing target of 2,000 homes pa is not being achieved which means that a penalty is applied adding to delivery numbers. Little acknowledgement in the plan that medical facilities are stretched but no additional hospital beds planned; problems with GPs, ambulance service, police, teachers, and yet the ambition is to magic up 45,000 jobs and add 100,000 to the population, mostly from inward migration. The consequential construction and vehicle journeys means no improvement to environment / quality of life. Acres of farmland are being sacrificed and the county is a water stress area. Support the CPRE view that no more sites should be allocated until current sites are delivered. Enlarging the plan is simply an excuse for more land agents to get rich via planning permissions on farmland.
30. *Hainford Parish Council*: No. Because the additional supply estimated to provide an additional 5600 dwellings on windfall sites would more than double the delivery buffer to 24% whereas 10% is the recommended level and it would increase uncertainty for developers and infrastructure providers. Also the Annual Monitoring Report states that there is a 28.4 years supply of housing land in BDC, 39.6 years supply in South Norfolk. Only Norwich has less than 5 years supply at 4.6 years supply.
31. *Hempnall Parish Council*: No. Given that the plan quite rightly estimates there will be 5,600 windfalls, we consider the windfalls to be a sufficient buffer.
32. *Kimberley and Carlton Forehoe Parish Council*: No. The delivery buffer should be less than 10%, if the allocation was around 500 new homes a year which could be absorbed cohesively within the ring road of Norwich itself. With small scale development in the countryside where it is needed.
33. *Poringland Parish Council*: No. Prefer to see clear policies rather than buffers.

34. *Reepham Town Council*: No. The statement in 4.22 that “A delivery buffer lower than 10% would make it much less likely that needs would be met” is not supported by the evidence which is that the satisfaction of needs is dependent on delivery, not targets. The practice of raising targets (and increasing buffers) because existing targets are not being met makes it even less likely that the new targets will be met. This is another demonstration of why allocations should be phased, that the current ones should be delivered before new ones are added.
35. *Salhouse Parish Council*: No. Why can't the buffer come from the windfall?
36. *Upton with Fishley Parish Council*: No, 5% might be better.
37. *Weston Longville Parish Council*: No, previously allocated sites have not yet been used, suggesting that previous estimates were over-optimistic.
38. *Bidwells*: No. We agree that a buffer should be used to ensure flexibility in the plan. However, the approach taken in the draft GNLP seems confused. The buffer should be applied to the OAN / LHN figure, which (using the plan figures) gives 4,784, and thus a requirement of land for 52,622 dwellings or 12748 when commitment and completions are deducted. However, we are concerned that the figure of 35,655 commitment is not explained and no evidence is provided, including on how much are existing allocations and whether they remain reasonable prospects for development. Until this figure is justified the figure of 12,748 additional land supply should be considered a minimum.
39. *Lanpro Services Ltd on their own behalf and on behalf of Nigel Hannant, Silfield Ltd, Glavenhill Strategic Land and Dennis Jeans Properties*: No. The figure of 7200 homes is considered to be too low (see Q4) and because a 10% delivery buffer is too low. This is particularly the case bearing in mind the track record of persistent under delivery of housing within the Norwich Policy Area since the adoption of the current Joint Core Strategy. This has necessitated the addition of a 20% buffer to the calculation of five year supply of housing land in the Norwich Policy Area. Whichever of the 6 growth options, or variations on them is finally chosen, it is likely that the vast majority of housing will be allocated in locations in and around Norwich because this is a sustainable model for future growth. All of the growth options show over 70% of housing to be located within the Norwich Policy Area. To ensure competition and choice in the availability of housing land and reduce the future likelihood of lack of 5 year supply, a 20% buffer should be added to the OAN figures for calculating the housing requirement. Windfalls should not be relied upon to make up any shortfalls. (See question 6 for more information).
40. *Gladman Developments*: In principle, Gladman are supportive of the approach to implement a 10% delivery buffer and allocate additional sites to ensure flexibility in the Council's housing land supply given that the majority of the Council's housing land supply will likely comprise of larger schemes located on the edge of Norwich which will require careful master planning, section 106 agreements, discharge of conditions and infrastructure requirements prior to development commencing. However, we question the justification behind the selection of the 10% buffer and why a higher buffer has not been considered. Indeed, the pre-submission Chelmsford Local Plan proposes a 20% supply buffer above the OAN to ensure housing supply in Chelmsford is maintained throughout the Local Plan period. Gladman consider that the Councils should consider their ability in delivering a higher buffer and that this is tested through the SA process.
41. *Harvey and Co*: It is entirely appropriate to assume the numbers could increase by applying the delivery buffer and making further provision for windfall sites. However,

we do believe the assumptions are likely to prove conservative and further contingency should be applied.

42. *Martin Skidmore represented by Carter Jonas LLP*: If, as expected, the objectively assessed housing need figure is amended to reflect the outcome of the standard methodology for calculating housing need, the duty to cooperate process, and the housing distribution between neighbouring authorities, then the outstanding housing requirement will also change. As such, the outstanding housing requirement figure of 7,200 dwellings will need to be adjusted.
43. *Barton Willmore on behalf of Norwich International Airport*: The GNLP has acknowledged that there has been an undersupply of housing delivery over the past few years. In addition, the Greater Norwich Area also has one of the worst affordability ratios in the country (over eight times more than the average salary). Therefore, a 10% buffer should be applied to the region, increasing the total amount of housing required over the planning period to 42,887. 6.8 The GNLP should be allocating enough land for 7,200 new dwellings after taking account of the existing commitments as of April 2017. 6.9 This significant growth for Greater Norwich adds considerable weight to the need to ensure the region has sufficient strategic employment land suitable for large-scale B2 and B8 uses situated with direct access to the strategic highway network.
44. *Pigeon Investment Management Ltd*: the plan should provide for a 15% delivery buffer and allocate sites for at least 15,750 new homes to take account of the City Deal, growth opportunities brought about by infrastructure upgrades (para 4.30 of the Growth Options document) under delivery of current and future commitment, potential changes in the OAN baseline (such as household projection changes) and to help ensure affordable housing delivery targets are met, on the basis that it is unlikely that all sites will be able to meet the affordable housing percentage requirement due to viability etc. If the Local Plan continues to progress on the basis of providing new sites for 7,200 homes, effectively ignoring the need to provide sites to support the City Deal, it would not provide a sufficiently robust and flexible strategy to deliver the Plan's ambitions, and would therefore run the risk of being found unsound.
45. *Taylor Wimpey represented by Carter Jonas LLP*: If, as expected, the objectively assessed housing need figure is amended to reflect the outcome of the standard methodology for calculating housing need, the duty to cooperate process, and the housing distribution between neighbouring authorities, then the outstanding housing requirement will also change. As such, the outstanding housing requirement figure of 7,200 dwellings will need to be adjusted.
46. *Woods Hardwick Planning Ltd*: No. Where housing needs are more acute and not currently being met the buffer should be higher. Larger strategic housing sites and new settlements can take longer to come forward than expected. It is essential to maximise the potential to deliver housing and so meet the shortage. Given the local housing delivery issues there should be a buffer of at least 20% in accordance with para 47 of the NPPF to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the housing market.

Question 6

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

A total of 167 responses were made to this question. Of these, 45 answered Yes, 110 answered No and a further 12 did not select either option but made additional comments.

Overview

Significantly more respondents (110) said 'No' than those who said 'Yes' (45).

The majority of 'Yes' comments were from agents, arguing that windfall should not be within the housing requirement and should be additional to any buffer. It was argued that this was because windfalls do not provide enough certainty on delivery and timing to be included in the housing figure and so no significant amount of windfall should be relied on. It was also maintained that there is a lack of evidence to support a specific windfall figure and that windfall is likely to reduce in the future, as in the past much windfall has resulted from 5YLS appeals. Also, it was argued that windfall generally occurs on smaller sites that do not provide affordable housing or other infrastructure benefits.

Alternative 'Yes' comments included arguments that windfall could provide an appropriate buffer, that it is useful in providing small-scale development in villages to address needs for young families and the elderly, and that windfall should be encouraged through positive policies. Conversely, it was also suggested that a high windfall figure could impact on services and infrastructure, and that planning for infrastructure was harder to do for windfall than for allocated sites.

The 'No' comments broadly split between many who thought that it was illogical not to include windfall in the housing calculation as it contributes to needs; to those who thought the windfall should be the buffer and to those (generally agents) who thought it should be excluded entirely because of its uncertainty.

Other more detailed comments included: smaller developments (e.g. up to 30 units and self-build and low cost homes) should be encouraged in villages instead of large developments; past housing delivery targets were too high and this is being continued; current commitment is sufficient based on past delivery rates; inaccurate figures have been used; Neighbourhood Plans should be used for allocations and growth is not necessarily good.

Some further comments related to the potential dis-benefits of significant windfall: it could result in over-supply and impact on the housing market or lead to unsustainably located development. NHS England stated that windfall sites can have a significant cumulative impact on health and social care needs, and so such proposals should be communicated to health and care providers in a timely manner.

Summaries of Specific Comments

Yes

1. *Broadland Housing Association, Indigo Planning, New Anglia LEP, UEA Students Union* and the following parish councils answered **yes** to Question 6 without further comment: *Brundall; Burston and Shimpling; Drayton; Hellesdon.*

Of the other respondents who answered **yes** to question 6, the following points were made

2. Windfall should be in addition. Usually small in number. Windfall sites are available within existing Development boundaries and covered by adopted policies. Use of windfall sites would allow small scale development to match local needs e.g. young people and elderly to stay in village close to their social networks. Should be in addition to an overall buffer of 20%. There does *not* appear to have been any detailed analysis of the source of windfall housing / no evidence for the windfall assertion; and in the past many windfall sites have come forward because of the lack of a 5 Year housing land supply. The actual sites and scale of delivery is unpredictable, therefore it would not provide any certainty to maximise housing delivery. Until we are sure how Inspectors view projections it is probably better to err for too many homes, inspectors favour minimum figures rather than maximum. Need an update of 5 Year Land supply figures; stopping development “off the plan” because of a lack of 5YLS goes against any orderly planning process.
3. *Kimberley and Carleton Forehoe Parish Council*: Yes. There will always need to be provision for one off *houses* in the countryside but no large scale developments as the research shows they don’t work. But they should go through the same process.
4. *CODE Development Planners Ltd* on behalf of *Ben Burgess* and *Drayton Farms*: Yes. Any windfall development should be in addition to the identified *minimum* 7,200 homes. Any windfall development which comes forward during the plan period will provide flexibility to enable enough additional growth to come forward to fully support the jobs growth sought through the City Deal and will assist in achieving the broad strategic approach referred to in paragraph 4.2 of promoting inclusive growth and social sustainability in village locations. Such an approach will also present opportunities for smaller house builders where larger developers would not achieve the larger returns on capital employed. We would though favour concentrating the delivery of windfall sites to those areas and villages within the Norwich Policy Area where the most sustainable locations will exist.
5. *Gladman Developments*: Yes. Support windfall being seen as addition to the proposed 10% buffer. Do not object to the use of windfalls in contributing to housing supply. However, the *identification* of a windfall allowance must be fully evidenced to ensure its compliance with paragraph 48 of the NPPF and the Councils will need to demonstrate that windfall development will continue to supply a reliable source of supply going forward. Once the GNLP is adopted including the proposed site allocations then the availability of sites from this source will reduce as highlighted in paragraph 4.51 of the draft GNLP. This reinforces the need for windfall to be in addition to the proposed buffers which will act as further contingency should any slippage occur in housing land supply.
6. *Lanpro Services Ltd* on their own behalf and on behalf of *Glavenhill Strategic Land, Dennis Jeans Properties, Nigel Hannant* and *Silfield Ltd*: Yes. The stated windfall of 5,600 is likely to be an overestimate. Recent trends have been heavily influenced by the

lack of a 5 Year land supply in the *NPA*. If the 5YLS shortage ends, then the delivery on windfall sites will be significantly reduced. Some past windfall development has been on brownfield sites, and the availability of these is likely to reduce because of the emphasis there has been on brownfield sites. Therefore, there should not be a reliance placed on windfall; it should be in addition to the housing requirement.

7. *Barton Willmore* on behalf of *Landowners Group Ltd* and the *Trustees of JM Greetham No.2 Settlement*: Yes. This is consistent with the NPPF (and emerging NPPF). Para. 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. The JCS provides an 'at least' housing target. In the light of relying on so many additional windfall dwellings (5,600) to introduce 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. Para 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.
8. *Carter Jonas LLP* on behalf of *Martin Skidmore* and *Taylor Wimpey*: Any windfall allowance should be in addition to the outstanding housing requirement because of the uncertainty of delivery and timing of windfall sites, and related difficulty in planning for the funding and delivery of infrastructure. Paragraph 48 of NPPF and Paragraph 24 (ID: 3) PPG permit the inclusion of a windfall allowance in the housing land *supply* provided compelling evidence is provided that such sites have and will continue to provide a reliable source of supply. This applies to the GNLP. Vacant and underused commercial sites and residential redevelopment opportunities and changes to permitted development rights allowing the conversion of office and agricultural buildings to residential use have and will contribute to the housing land supply in the future. An assessment should be undertaken to determine the potential capacity from all these sources. The more obvious opportunities will have taken place already. Windfall sites are either diminishing, variable or uncertain sources of housing supply. The planning and delivery of infrastructure is more certain when sites are allocated than for windfall sites. Therefore, more land should be allocated for residential development with less reliance on windfall sites. In addition, the proposed NPPF includes a requirement for 20% of allocations to be on sites of less than 0.5Ha. This, if adopted, is likely to mean that some smaller sites which might previously been windfall will now need to be specifically allocated. We anticipate that the windfall allowance will reduce as a result of this change.
9. *John Long Planning* on behalf of *Otley Properties; Pigeon Investment Management Ltd*: The windfall development figure should be dealt with as an addition to the housing requirement, not included as part of it, given its unpredictable nature and *lack* of certainty.
10. *Persimmon Homes*: Yes. The draft revised NPPF states that the standard method for calculating local housing needs should be a minimum number of homes. The NPPF and draft revised NPPF recognise that the Government's objective is to significantly boost the supply of homes. Therefore, Persimmon Homes agrees that windfall development should be in addition to the housing allocations as windfall cannot be relied upon to deliver the housing requirement. Policies should ensure there can be a positive

approach to determining planning applications for windfall development of all scales in sustainable locations in accordance with the presumption in favour of sustainable development.

11. *Wood Plc*: Yes. The windfall allowance should be in addition to the overall housing requirement *and* not part of the requirement. Additional allocations, including Hopkins Homes' land at Wroxham can assist in planning for the longer-term infrastructure requirements, including delivering affordable housing, rather than persisting with the piecemeal approach provided by an over reliance on windfalls. There may be a number of benefits in identifying additional greenfield sites rather than placing reliance on windfall sites. These include: It is far easier to bring forward affordable housing on planned allocations rather than windfall sites, which are typically smaller and may fall below a policy threshold for affordable housing. Ensure community benefits of a proposal are realised through Section 106/CIL agreements and through long term comprehensive planning of an area. Greenfield sites often have fewer constraints and can therefore make a greater contribution towards community facilities. Paragraph 182 sets out the four tests for soundness against which local plans will be assessed. This includes the tests of 'positively prepared' and 'effective'. In order for the plan to meet these tests the Local Plan should provide a responsive and flexible supply of housing to maintain housing delivery achieved through allocating more sites and making it clear that sustainable development (development in the right location, responding to needs and supporting the vitality of communities) will be supported.
12. *Woods Hardwick Planning Ltd*: Yes. The windfall development should be in addition to the 7,200 homes. Windfall sites do not provide the required level of certainty to meeting the overall *housing* target to be delivered by the Plan. Therefore a reliance on windfall sites does not provide the commitment comparable to allocated sites.

No

1. *Bramerton Cringleford, Wroxham, Hainford Hempnall and Tivetshall* Parish Councils answered **no** to Question 6 without further comment. Hainford and Hempnall both referring to their separate response to Question 5.

Of the other respondents who answered **no** to question 6, the following points were made

2. See answers to Q4 and Q5. Smaller developments are better than larger scale; need to support developments of 10 – 30 homes in villages; every village to have a small development which would spread the pressure on infrastructure / services; smaller developments are to a better standard / more attractive / more sustainable; encourage small-scale windfall development.
3. Windfall can have a massive burden on infrastructure, particularly villages with small schools, no doctors, inadequate water / sewerage. Too conservative, more homes means more people and jobs which boosts the economy. Desire for more dwellings is predicated on jobs growth, which is too high. The windfall provides the buffer to reach the target. Windfall sites can provide a significant contribution to the housing requirements; including them would not undermine the overall growth of the area. Windfall are still homes, it is illogical to not include; they should be included to avoid over-development / reduce need for development. The SA is clear (pg. 24) that it is assumed windfall will continue to come forward at historic rates; therefore this is a given, and so the housing figure should be reduced by 5,000 (over 19 years). If windfalls are counted in addition this is 4% over-supply; if there are to be 5600 windfalls this gives

a requirement of just 1600; windfall should be removed as they are more certain to be delivered, giving requirement of circa 5,500. The buffer will be 24% which is excessive, it will undermine the Plan.

4. No need for a 20% buffer. Current commitments are sufficient to meet completion rate of around 1500. It will lead to far more houses than are needed; will lead to too many sites being allocated. An oversupply could have adverse impact upon the local housing market. Buffer should be phased. I'd like some farmland left to suit my lifestyle needs. Not including non-development houses seems like a political game. It undermines the original planning purpose and creates debate about the appropriateness of sites not originally agreed upon. It is dishonest to exclude windfall. It should be a mix-match of buffer and windfall not both. Windfall development inevitably materializes through redevelopment, conversions, and revised plans for more dwellings.
5. Government should remove need for buffer by penalising developers who sit on permissions. A proactive approach to delivery is needed; OAN needs to be tested for correctness, and a fine grain property market analysis commissioned to understand drivers of demand, need and place potential of the Norwich housing market. Land for growing food and combating climate change is too valuable to be haggled over. Windfall sites can reduce the pressure to concrete over countryside. If the methodology for calculating the numbers is correct it is not necessary to have the windfall in addition. It indicates a lack of confidence in the figures; it questions the sincerity of the estimates, why should we be bound in the future by past inaccurate targets; JCS targets were too high and not met, so should not be set higher now; the higher the target the higher the bar will be in the future; trying to be too precise with the figures.
6. There is little control over windfall, and it is not accurately quantifiable; as windfall sites happen there should be a readjustment of the sites that are identified to make up the balance. It should be netted off or it will be another tactic for pushing through the wrong schemes. Windfall sites should only be allowed if appropriate (e.g. sustainable access to facilities). Encourage small-scale building, self-build and low cost housing. Limit it to local resident builds, not non-descript estates. Windfall should follow different rules to major developments (it is natural / more organic, smaller and makes more use of brownfield sites.)
7. It is not necessarily the case that growth is good, planners need to take off their blindfolds and realise that they are, lemming like, being driven to the edge of a very high cliff. SNC only count sites of at least 5 towards the figures, whereas a lot of infill and windfall happens; these should be counted to avoid larger developments being imposed on smaller communities. It would allow developers to develop where it would otherwise be refused; the windfall is in the City who may be attempting to push growth out of its boundaries; development in the city is slow because of expense of building on brownfield land. Concerns over the delivery of infrastructure (4.26), it will not be provided, or diverted elsewhere for projects favoured by officers; infrastructure in the central area will be subsidised by distant villages (4.31). Delivering affordable / supported housing is too far down the list (4.28). Essential infrastructure is at the end of the list (4.28). Problems with soakaways in Poringland. Developers renegotiate because of viability issues which can be misinterpreted (4.34). Para 4.37 implies an arm's length vehicle with overpaid executives, prefer closely monitored public servants. How were people recruited to the workshops (4.39)?

8. *Climate Hope Action in Norfolk*: According to the GNLN document: “based on recent trends and projected future delivery, it is estimated that an additional supply of up to 5,600 dwellings could be provided during the plan period on “windfall sites”. We find this a very significant addition to the proposed 7,200 homes (which already includes a delivery buffer to allow flexibility) proposed in the GNLN. If windfall development is to be considered separately from planned housing numbers, we seek assurances about how this development may be restricted. The overall aim must surely be to minimize the proportion of houses built on unallocated or windfall sites and additionally ensuring that the overall integrity of development meets the aims set out of reducing carbon emissions and maximising use of public and active transport.
9. *Diss and District Neighbourhood Plan Group*: No. Windfall development may provide for small developments in settlements that help sustain them and deliver local housing need. Windfall sites may not prove viable or the requisite infrastructure cannot be provided in a timely manner if at all. Allocation of housing over and above OAN plus 10% buffer should be realised in a planned and managed way, e.g. through the Neighbourhood Planning process, within an overall context and holistic approach, addressing the provision of economic growth to sustain it and the accompanying services and infrastructure to support it.
10. *CPRE Norfolk*: No. Because the GNLN Authorities have to consider a 20% buffer, due to their failure to meet housing delivery targets set in the JCS, this has resulted in the absurd situation where because targets were set at too high a level in the past, they have to be increased to an even higher level in the future. Given that the likely rate of house completions will continue at around 1,500 per annum and current commitments will be sufficient to cover this, there really should be no need for a 20% buffer. Given that the housing allocations in the JCS were set far too high in terms of the deliverability, it is important that the same mistake is not made again. It would be wise to heed the recent words of Savid Javid that if Local Authorities fail to deliver the numbers put into their plans, then independent Inspectors would come in and unregulated development could well result.
11. *Hope Community Church Wymondham*: No. This would put an additional strain on the infrastructure of a community without the requirement for strategic improvements.
12. *Liberal Democrat Group City Council*: No. No need for windfalls in addition. If previous housing targets were set too high, don't perpetuate this unattainable level of housing. Windfalls should be treated like new sites and used in a phased way.
13. *NHS Norwich CCG*: Section 4.13 states that more people are moving into the areas and therefore additional housing is required. Whilst it is recognised that the population of Greater Norwich needs to grow, it needs to be taken into account that the existing population and potential new population increasingly has more complex health and social care needs and that any increase in population numbers will be an additional pressure on all health services, including primary and secondary care, with increased infrastructure and capacity required. These windfall sites can have a significant cumulative impact on population growth and requirement for health and social care needs, particularly general practice, and should therefore be communicated to the STP and health and care partners in a clear and timely manner to allow for proactive planning of health services and infrastructure in response to the population increase.
14. *Norwich Green Party*: No. This would be likely to raise the buffer to around 24%, which undermines the purpose of the plan in allocating appropriate sites for development.

With the government having stated its intention to make it easier to build upwards, considerably more windfall development could come forward than current projections suggest. Small-scale windfall development can be an appropriate way to meet local housing need, and this should be seen as contributing to the overall need identified in the plan, not additional to it.

15. *Wensum Valley Alliance*: No. Because the 7200 are not realistically justified in the first place.
16. *Barford Parish Council*: No. If windfall developments become available and are in more suitable locations than those being currently identified then the total should be reduced accordingly. There should be no necessity to add additional strain to the infrastructure by a larger housing number than is required.
17. *Bergh Apton Parish Council*: No. Given the likely rate of house completion will continue at around 1,500 per annum, current commitments will be sufficient to cover these. There is no need for a 20 per cent buffer.
18. *Brockdish and Thorpe Abbots Parish Council*: No. The acknowledgement that windfall sites are a fact of life is welcomed but these should be regarded as a 'commitment' rather than a 'bolt on bonus'. Moreover there appears to be no monitoring of windfall development and the extent to which, in all probability, it contributes most to meeting local need.
19. *Costessey Parish Council*: No. Windfall development sites should be included in the 7,200 homes figure.
20. *Dickleburgh and Rushall Parish Council*: No. We see no reason why this significant figure should not be included in the overall housing delivery figure.
21. *Framingham Earl Parish Council*: No. Windfalls should be part of the calculations for the 7,200; they are still homes and therefore should be included as such.
22. *Little Melton Parish Council*: No. It seems to make the concept of calculating a target to be *meaningless* if you exclude something that contributes to meeting the target!
23. *Marlingford and Colton Parish Council*: No. Targets were set at too high a level in the past, resulting in an unjustified expectation they should be increased to an even higher level in the future. *Because* the rate of house completions is likely to continue at around 1,500 per annum and current commitments are already sufficient to cover this, there is absolutely no need for a 20% buffer over and above the 7,200 homes.
24. *Poringland Parish Council*: No. Should be part of the 7,200 homes. Windfall sites are still homes and *should* be counted.
25. *Reepham Town Council*: No. There is no significant scope for windfall development in *Reepham*.
26. *Salhouse Parish Council*: No. Why can't the buffer come from the windfall?
27. *Scole Parish Council*: No. Windfall sites rarely fit in with any area policy.
28. *Thorpe St Andrew Town Council*: No. The figure for windfall development is too high as added to the 7,200 homes for the 10% buffer this could add an extra 5,600 dwellings which is up to 24% higher than first projected.
29. *Thurton Parish Council*: No. The *GNLP* have to consider a 20% buffer because they failed to meet their JCS Housing Delivery targets. This has resulted in the absurd situation where targets were set to high in the past, they have to be increased to a higher level in the future. If the likely rate of completions continues at 1,500pa, current commitments should be sufficient without the need for a 20% buffer.

30. *Upton with Fishley Parish Council*: No. If the calculations suggest that 7,200 homes are needed then 7,200 should be the maximum. Windfall development should be deducted from the proposed sites. It is vital that the current allocations are moved forward before new sites are agreed, or else there will be no joined -up approach to development.
31. *Bidwells*: No. At this stage, without further evidence as to what has been included in the committed development, or how windfall has been calculated, it is not possible to provide a detailed comment on this. However, by its very nature, windfall should only make a marginal contribution to the housing land supply in a plan-led system. Consequently, without the compelling evidence that windfall would continue to be a reliable source of housing in the future, it should not be included in the housing land supply.
32. *Jarrold and Sons Ltd*: No. This should be reviewed based on activity levels and need at the time.

DRAFT

INFRASTRUCTURE

Question 7

Are there any infrastructure requirements needed to support the overall scale of growth?

There were 149 individual responses to question 7 and a further 35 comments relating to general infrastructure requirements made under question 10. The following prospective improvements and concerns were mentioned by private individuals in general comments.

Overview

The vast majority of respondents (138) felt that there are infrastructure requirements to support the overall scale of growth, with just 4 respondents stating that there are none. In line with discussions at consultation events, many responses focussed on health, transport, schools and water. In addition, a number of responses stated that infrastructure needs would be dependent on the option chosen for growth. In line with the approach currently being taken, the need for an infrastructure study to set out needs and inform policy once the chosen option is clarified was identified.

Those who made more general infrastructure comments against Question 10 argued that additional infrastructure would be required as a result of growth, with some stating that this was a reason to limit growth. Many responses focussed on health, transport, schools and water.

Summaries of Specific Comments

Note: A considerable number of respondents made general comments about infrastructure requirements against Question 10 (which was intended to deal with specific infrastructure requirements for the alternative growth options) rather than against this question. Responses to Question 10 which were clearly intended to be general in scope or related to either all or none of the growth options are included here instead for consistency. These comments are included below.

General needs *(includes responses made against question 10)*

1. Many of the growth option rely entirely on the current infrastructure which in most cases cannot cope with the existing levels. Lack of Doctors, Schools and even the levels of existing transport links and roads limit the ability to grow. These need addressing more before adding developments. There are no rail stations, poor public transport, unsafe walking, cycling, riding and disabled facilities, flood risk, water stress and pressure on City radial roads.
2. Look around you. All current infrastructure is at breaking point! We are at capacity
 - Water. East Anglia has low rainfall. We cannot support a large number of new houses.
 - Poor infrastructure that may not be suitable to be changed

- Fewer brownfield sites
 - Land offered that is totally unsuitable for redevelopment
 - Poor transport links that will always be struggling to remain viable
 - Lack of suitable employment opportunities
 - Hospitals, doctors, dentists, sewerage disposal, refuse disposal, school places and staffing.
 - You also have to remember that these people will become older (hopefully) and may well require care. Care training must not be forgotten
3. Roads, public transport, alternatives to cars e.g. cycle routes. Broadband speed.
 4. New Anglia LEP welcomed the opportunity to continue to support the acceleration of economic growth through future agile, innovative delivery models and funding mechanisms.
 5. Respondents stated there is a need for timely provision of new infrastructure, with some stating that too many promises in recent years had not been delivered.
 6. Respondents argued that consideration of infrastructure constraints and further development of the evidence base is critical to the identification of the most appropriate growth locations.
 7. It was argued that a dispersed approach to accommodating a proportion of may allow for more development to come forward within existing capacity limits in rural areas, or in areas where the upgrades are more affordable/easy to deliver.
 8. Others argued that it is easier to provide infrastructure if development is in new settlements.
 9. It was also stated that development should be focussed on fewer, larger areas, for which a comprehensive delivery programme on all aspects of the development can be established because the scale and quantum exists to generate viability for infrastructure.
 10. It was argued that local authorities must have greater funding from Government and be able to borrow money as CIL will not meet infrastructure needs.

Strategic Infrastructure Considerations

11. Congestion can only be reduced through much greater investment in public transport (notably the long-promised BRT network, for which the money seems to have been swallowed up by the NDR which was supposed to facilitate it);
12. No road scheme should proceed without an equal amount of investment in other forms of transport;
13. Climate mitigation and adaptation must be considered;
14. Sustainable transport costs are less if housing is concentrated in and around existing centres at higher densities, with brownfield development maximised (supporters for this approach include the CPRE);
15. If villages are forced to have development, transport links, including buses, need to be good.

Road Infrastructure

16. There is a need for better links to major trunk and main roads - more dual carriageways on the key arterial routes - particularly:
 - a) the A47 (needs to be dualled), links to Yarmouth
 - b) the A140 to Ipswich

- c) Roads to Kings Lynn and Diss
 - d) The City Centre new road system is causing large bottlenecks and queuing traffic which will not help air pollution. The traffic needs to flow, more work needs to be done modelling and improving traffic flow around the city not closing roads and add cycle lanes.
 - e) The NDR needs to be extended through to the A47 on the western side of Norwich. The NDR western link must be completed from the A1067 to A47 and is critical to support housing growth,
 - f) The A11 and A14 in the Cambridge/Norwich corridor are already operating close to capacity.
 - g) The A1151 is already very congested as are adjacent roads.
 - h) 'A Roads' should take the traffic flow and protect the rural roads which are poorly maintained.
 - i) The Thickthorn roundabout must be improved.
 - j) The dualling of the A47 from Acle to Dereham
 - k) The Long Stratton Bypass is very important for further growth; the proposed access is not sufficient.
 - l) It is also likely that improvements will be required to A47 southern bypass junctions, (e.g. Thickthorn, Longwater) to ensure sufficient capacity.
17. Poor road maintenance - poor mobile and broadband services and poor railway services - plus poor bus services - even between main centres.
 18. Road network will struggle to cope,
 19. [Growth will result in] increasing traffic congestion on poor roads system with concurrent air deterioration, increasing noise pollution and the detritus of man bordering all routes.
 20. The entire infrastructure requirements particularly transport must be considered in detail in any development strategy. Road connections to the west of the county, the gateway to the north, are a major concern.
 21. [...] improvements to the road structure to cope with additional traffic generated.
 22. All the options will face infrastructure constraints in regard to traffic coming into the City and the strain on resources in regard to a growing population and a lack of government investment.
 23. Any development of the scale suggested is going to increase demands for commuting - hence road and public transport increases will be needed with any but the smallest of developments.
 24. The road network must be upgraded. The Long Stratton bypass, in particular, must be dual carriageway, and must be a proper bypass instead of just an access road for the development (and Swan Lane) - and must be delivered before further development. Thinking about it, perhaps a proper bypass from the (expected) Hempnall crossroads roundabout to somewhere well south, as well as what is proposed might be most sensible.
 25. All the roads in Norwich are gridlocked at rush hour. Planners need to help design out problems such as these. Building development, both housing and jobs, outside the dual carriageways would surely help reduce the amount of traffic on Norwich's roads. This would in turn make Norwich more accessible for people who need [to access] specialist services that it provides. All of them would require improvements to the road network and not just in the immediate vicinity but on the routes to employment areas. If a

growth option was near a railway, such as the Norwich-London route a new railway station or bus/tram line into Norwich could limit the impact on the roads.

26. ... Bracondale is already at capacity for much of the day, and additional development in places that would add to this strain should be delayed until the road system is improved - the departure of Colmans and Britvic from Carrow may enable this to [happen].
27. [All the growth options] seem to be based around paying for very expensive roads.
28. Dualling of the A47 from Acle to Dereham is critical as is the completion of the NDR western link from the A1067 to A47.
29. Rural infrastructure e.g. petrol stations may need to be located outside existing settlements
30. Car sharing should be promoted.
31. Mitigation measures to address noise derived from the A47 - People living inside the A47 in the area west of Norwich are blighted by much greater noise levels than the noise survey data would suggest due to prevailing winds from the west. As the number of people living along this corridor increases, the road use and noise will only continue to increase without appropriate measures such as resurfacing/reducing speed limits etc.

Rail infrastructure

32. Improvements to rail links including additional stops
 - a) Norwich with Cambridge - faster urban railways linking to Oxford and the Midlands
 - b) Trains to London - Journey time needs to be reduced along with improving the reliability of the service.
 - c) Ipswich to the North coast requires improved rail links
 - d) More stops and better local services; new stations at Cringleford (Thickthorn), Mangreen, Broadland Business Park
 - e) Enhanced rail link between Cambridge, Norwich and Ipswich.
33. Improved low cost alternatives better bus and rail services extension of the park and ride system. Park and ride also need to be made cheaper to encourage more people to use it. Could you also tie into to park and rail system expanding village stations parking provision and reducing costs to get more people on the rail system. Think Acle, Blofield, Brundall, Wroxham, Spooner row etc. and the many smaller stations. People drive from outlying villages and park and ride from a small local rail station. Most of the smaller stations have very limited parking provisions, but cost of service will be key; it needs to be cheap or people will not use it. Parking at small stations included as part of the rail ticket like bus park and ride system. Could you tie in existing park and ride system with rail such as [is the case at] Postwick, it has line right next to it maybe add a rail station rather than just adding buses.
34. Replacement of the Trowse swing bridge by a double track bridge and/or need for parkway station near Mangreen;
35. Threats to public transport and health care within existing communities. Increase in traffic congestion in urban areas. Inability to keep roads tidy over the whole county.
36. Decent road, public transport, cycle and walking routes on the radial roads leading into the Norwich Area. The provision of the railway stops on the Bittern line to service the growth areas around Thorpe St Andrew and the Plumsteads.
37. Public transport presents problems for all the options, but even more so with the options involving development away from Norwich.

38. Public transport, cycle tracks, schools, sew[er]age etc. etc.
39. Rail needs to be improved.

Other Transport Infrastructure

40. Given the current and future economic importance of Norwich Airport, development nearby must not become a barrier to the airport's future expansion.
41. Public Transport (rail and bus) must be provided. Additional stations must be opened (Postwick, Broadland Business Park)
42. Tram/light rail services could be an option to reduce reliability on car usage.
43. Better cycling infrastructure is needed.
44. Electric Charging stations for cars should be provided.
45. The Bus Rapid Transport network is essential and should be developed as planned.
46. Safe pedestrian routes linking development to local schools – there are problems with traffic speeds in Wymondham (Tuttles Lane for example)
47. Encourage more car sharing
48. Services should be more affordable.
49. Need for rapid bus routes across the county.
50. High quality walking and cycling facilities required;
51. Segregated cycle routes needed.

Parking

52. Improved Park and Ride provision – need more frequent and affordable services and available on Sundays.
53. Reducing park and ride cost will be key to reducing traffic in the city centre.
54. Additional Parking Required at Hethersett.

Community Infrastructure

55. The following services currently stretched are:
 - a) School places,
 - b) Hospital space,
 - c) Doctors capacity (GP surgeries),
 - d) NHS dentists.

All areas are finding it hard to cope with current volume of people and this has led to long waiting list to get an appointment.

56. A new site with good transport connection or policy requirements for connectivity for a site for new Medical Surgery to service between 10-12,000 people.
57. Allow for Norwich Airport to grow to achieve economic prosperity.
58. More community / Sports facilities are needed.
59. Adequate libraries are needed.
60. Other constraints will be health care, The Norfolk and Norwich hospital is already short of beds and is locked into building service cost which are bleeding the NHS of money. The building costs are ridiculous the contract needs amendment and the costs need to be drastically reduced this a very bad deal for Norfolk. Schools, doctors, police, fire will all need much investment to cope with the extra burden of the additional housing.
61. Health provision including GP practices and dental surgeries.

62. *The Department for Education* stated that the draft local plan should identify specific sites (existing or new) which can deliver the school places needed to support growth, based on the latest evidence of identified need and demand;
63. Better education facilities are required for all children, not just those in the well-off areas;
64. There is a difficulty in attracting teachers into the area.
65. Libraries, local shops and additional policing are needed.
66. Care facilities and homes for the elderly are needed
67. The New Home Bonus generated by new developments should help fund Healthcare facilities where there may be funding shortfalls.
68. Specific healthcare priorities should be identified for funding through the Greater Norwich Growth Programme (Infrastructure Plan) funded by CIL.

Communications Technology

69. Broadband – Speed needs to be improved
70. Mobile Signal – needs to be improved in the rural areas

Utilities

71. Energy – renewable energy is essential
72. Recycled Water - foul water infrastructure provisions
73. Sewerage Capacity is a major concern
74. Water Supply – see Anglian Water Comments below
75. Shortage of water and contamination and pollution of water ways, increasing air pollution.
76. Main Sewers to follow the "link Roads" of the Growth Triangle Area Action Plan and we assume telecoms and power upgrades as well. More clean water and more action to reduce flooding.
77. Adequate water supplies without adversely affecting local environment

Green infrastructure

78. Open Space needs to be provided on site instead of off-site in residential developments.
79. [Growth will result in] Destruction of the natural environment with harm to wildlife and flora and fauna, visual amenity.
80. ... Provision of sport and recreational facilities and green corridors for wildlife.
81. Further expansion of the green infrastructure network (including habitat protection and creation and cycling and walking facilities) is supported by a number of respondents including Natural England and the Yare Valley Society;
82. There was support for a network of strategic country parks associated with site allocations from some agents;
83. Additional playgrounds, sports and recreation facilities are needed;
84. Local food production should be supported.

Settlement-specific infrastructure requirements and other suggestions

85. In response to both this question and Question 10 a number of parish and town councils, other organisations and individuals identified infrastructure requirements in specific settlements which would be required to support growth:

- **Hethersett** - health facilities, village centre facilities (no room for expansion), traffic management + parking, ;
- **Wymondham** - school places, general infrastructure + community facilities;
- **Hellesdon** - doctors + community facilities;
- **Aylsham** – road links, health facilities, traffic management, parking;
- **Diss** - education, health and road improvements are required in the area. This would help realise greater opportunities for growth;
- **Scole** – schools, healthcare (including local X-Ray facilities) + highways.
- **Dickleburgh** - highways, health facilities, schools + sewerage;
- **Poringland** – drainage, chemist, GP surgery, traffic management + improved mobile phone reception;
- **Hainford** - improved public transport, health services, drainage, telecommunications, schools + roads;
- **Reepham** – improved road access, possibly primary school and sewage works;
- **Mulbarton** - an agent stated that a developer is willing to provide a surgery site for nil cost but there will be a need for additional funding.
- The Honingham Thorpe proposal affects **Barford, Marlingford and Colton and Barnham Broom** and beyond. Linked by old single track roads, and footpaths, through attractive country and valleys. No infrastructure in area outlined, massive knock on effects elsewhere. Hugely destructive to quality of life in neighbouring rural villages and environment. To call area E a country park is disingenuous - it would be an area of public access green space on the doorstep of thousands of people.

86. *Caistor St Edmund Parish Council* (In response to Question 10) There has been too much development already in the areas of **Poringland, Stoke Holy Cross and Framingham Earl** which is leading to increased traffic, schools becoming full and the erosion of village life.

87. *Brundall Parish Council* – Importance (urgency) should be placed upon hospital growth, GP practices and employment. In response to Question 10 Brundall Parish Council added that “Constraints are that a certain burden is placed on the infrastructure of each of the parishes affected with limited ability of developers to contribute meaningfully”.

88. *Weston Longville Parish Council* – Construction of the NDR Western Link and dualling of the A47. Large scale developments - such as Thorpe Marriott - are often started before infrastructure such as schools and GPs are in place, putting short term strain on the existing infrastructure which, whilst 'short term' still often goes on for years. [Weston Longville Parish Council also highlighted the need for the Western Link to support growth in their separate response to Question 10].

89. *Thurton Parish Council* – Particular attention should be given to market failure in the provision of health and social care and broadband.

90. *Diss and District Neighbourhood Plan Steering Group* – Within **Diss and surrounding area** there are services likely to be stretched such as primary and secondary schooling by current levels of growth, including across into Suffolk. Healthcare services are

comparatively substandard, requirement GP patients to travel to the NNUH for the simplest of procedures. Congestion along the A1066 and the absence of any good links between that road and the A140 and A143 is impacting on side roads through the smaller settlements. Addressing such infrastructure issues jointly with Babergh Mid Suffolk and Suffolk CC in the south of South Norfolk and north of Mid Suffolk will bring greater synergy by resolving such issues collectively than would ever be realised if each local planning authority acted individually. By doing so, much greater opportunities for growth may be realised that will sustain and develop a rather neglected area sat neatly between Norwich and Ipswich (and Bury St Edmunds), astride main traffic routes and well-connected by main line railway.

91. *Scole Parish Council* – primary and secondary schooling provision [in **Scole**] is already oversubscribed and will be even more so if the proposed sites are developed. Local Healthcare services are substandard and filled to overflowing. Congestion along the A1066 and the absence of any good links between that road and the A140 and A143 are impacting on rat running through the smaller settlements and is seriously impacting local employers.
92. *Great and Little Plumstead Parish Council* – Infrastructure should be looked at before the housing. Over the last few years major developments have happened and nothing has changed in the surround infrastructure. We are now at the problem of schools, doctors and dentists etc. being over prescribed and at full capacity. We also need to look at local shops. Too many large housing developments are being put in without provision for a local shop, so everyone is having to travel by car to buy a simple pint of milk. This in turn is destroying our countryside and damaging our roads. Road infrastructure also needs to be reviewed when looking at site allocation. Some of the site allocations are exiting onto roads which are little more than country roads and cannot cope with a large volume of traffic.
93. *Reepham Town Council* – **Reepham** is poorly served with infrastructure, particularly road access, and any *significant* development within the parish would need appropriate improvement of the existing infrastructure.
94. *Wroxham Parish Council* – urgent relief for the already overly congested A1151 and adjacent roads. Review of river crossings.
95. *Dickleburgh and Rushall Parish Council* - When development is planned for villages and small towns, regard must be had to:
 1. The transport infrastructure, notably with reference to cars, heavy traffic and the safety of pedestrians;
 2. The local school [having] sufficient capacity for the increased population.
 3. Sewage (sic)
 4. The integrity and character of the village/town.
96. *Hainford Parish Council* - improved public transport, health services, drainage, telecommunications, schools and roads.
97. *Hellesdon Parish Council* - Road infrastructure, drainage and utilities. In response to question 10 Hellesdon Parish Council added that road congestion in **Hellesdon** is now unacceptable.
98. *Little Melton Parish Council* – We keep talking about encouraging walking and cycling but are building houses at **Hethersett** before the cycle path that people need in order to get to work at the NRP/UEA and hospital - thus making traffic problems even worse.

99. *Bramerton Parish Council* – Better public transport links. In response to Question 10 Bramerton Parish Council added that growth would result in encroachment on valuable agricultural land and sensitive wildlife sites.
100. *Thorpe St Andrew Town Council* – We have concerns about water infrastructure, because this is the driest part of the country and we need to be looking at it as part of the growth programme. In addition, we should be looking more at renewable energy- as future green electricity *supply* will come from different connection, which involves additional infrastructure.
101. *Kimberley and Carleton Forehoe Parish Council* - Massive infrastructure investment would be needed for the level of housing proposed – not something the country could afford. Distributing the developments around rural towns means infrastructure is not properly addressed *and* ghettos are created as a result of poor planning. It is cheaper to do larger city projects where existing infrastructure can be enhanced and where the jobs will be. There is evidence in Norfolk of infrastructure not being planned properly – e.g. Queens Hills [Costessey], Whispering Oaks in Wymondham. In response to Question 10 Kimberley and Carleton Forehoe Parish Council commented that “... larger developments [seem to be] planned without taking into account medical facilities, education, transport etc. In rural towns that have been blighted by poor bulk planning with far too many houses of the wrong type - the schools and GP’s are oversubscribed and evidence is the quality of care/teaching is falling. Roads are clogged with new traffic. No more buses or trains have been provided. As the aging population becomes more dependent on family as the state withdraws provision must be made for generational housing”
102. *Costessey Town Council*. Infrastructure needs to be in place BEFOREHAND. Infrastructure needed: GP’s surgeries; additional hospital provision; care and retirement homes; extra school places; better roads and increased capacity; more sewerage capacity; increased water supply; more utility supply – e.g. electricity and gas. Future healthcare should be provided by CIL and S106 agreements as are other infrastructure provisions.
103. *Burston and Shimpling Parish Council* (in response to Question 10) All of the options will come with their own specific requirements, especially the improvement of roads if outlying parts are to become ‘dormitories’ for the city
104. *Cringleford Parish Council* - More roads, water resilience.
105. *Salhouse Parish Council* - Sewage, water supply and utilities in general all need upgrading. In addition to the usual *NHS*, schools and transport.
106. *Poringland Parish Council* - Any further growth in Poringland needs wholesale redesign of drainage within the area. There will be overload on sewerage, drainage, power and water, and existing infrastructure will become worn more quickly. The infrastructure requirements will be massive. Another important requirement is for improved mobile phone coverage in the ‘not spots’ around the village. In response to question 10 Poringland Parish Council commented that that there are significant constraints which the developers need to pay to improve.
107. *Colney Parish Council* - Place much more emphasis on cycling, walking, local job creation, local food production and delivery, and the ubiquitous introduction of broadband.
108. *Framingham Earl Parish Council* – The whole of the area requires far more input to the infrastructure, better road networks, upgrading the A11 and A47, better rural

broadband connections. New schools will be needed, as some rural areas are already working to near full capacity and with the projected new homes which will inevitably mean more children requiring both primary and secondary education. Public transport whilst very good with city areas it is sadly lacking in many rural communities meaning those people have to use their cars to get to work, and to get children to school.

109. *Costessey Town Council* – Infrastructure needed includes GP’s surgeries; additional hospital provision; care and retirement homes; extra school places; better roads and increased capacity; more sewerage capacity; increased water supply; more utility supply – e.g. electricity and gas. Future healthcare should be provided by CIL and S106 agreements as are other infrastructure provisions.
110. *Suffolk County Council* – There will be several types of infrastructure, often significant investments, to support the overall scale of growth. Suffolk County Council will engage further with the adjoining authorities as the growth options emerge. The regenerative impact of additional infrastructure should be considered alongside the available capacity, as part of achieving the economic and community objectives.
111. *Norwich Society* – Regarding the general growth strategy, we believe that this should be guided by three key factors:
- Sites should be sustainable in terms of infrastructure such as schools, medical facilities, shops and community services as well as having good transport links to the main employment centres (it is worth pointing out that it cannot be assumed that everyone in a household works in the same area: good links to more than one employment area are therefore desirable);
 - There needs to be a balance between development that “maintains and enhances the vitality in main towns and larger villages and development that simply burdens existing facilities and roads without adding much in the way of new infrastructure. There needs to be real evidence that adding the suggested minimum of 1000 homes to each of these will actually be beneficial, not least because some of them are not in the most sustainable locations;
112. *New Anglia LEP* - The opportunity to continue to support the acceleration of economic growth through future agile, innovative delivery models and funding mechanisms is welcomed.
113. *Wensum Valley Alliance* - In every area of social provision from Hospital beds, to GP's, to police forces, to ambulance crews, to social services, to teaching there are already shortfalls in provision and employment. The infrastructure issues relating to transport do not reach out into the new fringe suburbs as many radial roads lack footpaths and cycle paths for safe access to the employment centres. Norfolk is a water stress area with each new development adding to strains upon water supply. The County is not yet adequately supplied with High Speed Broadband, so yes, significant infrastructure investment is required to match existing demands, let alone provide for the scale of the proposed new developments. In response to Question 10 the Wensum Valley Alliance also highlighted the inability of the Health services to match the demands and an increasing lack of water.
114. *NHS Norwich CCG*. – In order to meet these objectives whilst also responding to the population increases proposed in the GNLP there will be a need to increase health infrastructure to support increased demand. This will apply to all areas but particularly around the areas associated with large scale growth in concentrated areas, for example the North East of Norwich. Section 4.26 acknowledges that GP surgeries and Hospitals

are appropriate infrastructure to support the growth outlined in the GNLP. However whilst Section 4.31 discusses CIL as one source of funds for delivering infrastructure, health is currently missing from the Regulation 123 list for any of the Greater Norwich authorities. There is also no mention of S106 funding for health when large scale residential developments trigger the requirement for additional health infrastructure as a direct result of the development. Therefore the GNLP has recognised health infrastructure as important to the delivery of the GNLP but has not provided any way of accessing any potential funding or land/infrastructure required. There is an implied assumption that health and care partners will need to fully fund their own infrastructure requirements that will be required as a direct result of the GNLP. This is an issue that the STP [NHS Sustainability and Transformation Partnership] and health and care partners would like to address and request for health to be included on the Regulation 123 list and for health to be considered for S106 contributions where appropriate. This will assist health and care partners to support the delivery of the GNLP with healthcare infrastructure. There is also a requirement by the STP and health and care partners for infrastructure requirements to include better broadband access across the Greater Norwich area. This would ensure there is the correct infrastructure in place to support virtual appointments with healthcare professionals and to also support mobile working and new ways of working that will be required to meet the demands from an increase in population.

In response to question 10, NHS Norwich CCG made the following comments in addition: There would be health infrastructure constraints associated with large scale growth. Section 4.61 states that the absolute minimum eventual size for a new settlement is likely to be around 2000 homes. A new settlement of 2000 homes, using the census data of 2.3 people per dwelling, would lead to an additional 4600 patients in the health system. An additional 4600 patients would equate to an additional 315sqm of primary care space required, plus the associated impact on community care, social care, mental health and acute hospitals. These constraints would need to be taken into account when the options of the plan are decided, as there is not currently sufficient capacity in health infrastructure to accommodate these large increases in population. In addition to impact on immediate primary care services, there would be knock on impacts to other NHS services within community and acute hospital settings.

115. *Highways England* - Highways England will review and provide comments on any amendments to local plans proposed by local planning authorities that have the potential to affect any part of the SRN [Strategic Road Network].
116. *Railfuture East Anglia* - RFEA wishes to restate the following rail related improvements:
 - Replacement of the Trowse swing bridge by a double track bridge which we regard as critical. Without this improvement, the full benefits of Norwich in 90 or East West Rail cannot be realised due to capacity constraints.
 - New station at Dussindale as identified by Mouchel and originally contained within the Joint Core Strategy
 - Provision for two further stations at Thickthorn and Long Stratton put forward by ourselves.
117. *Natural England* – Green Infrastructure (GI) of the correct type needs to be delivered in the right places at the right time, in accordance with the Green Infrastructure Network for Greater Norwich map (within the Joint Core Strategy (JCS)). Quality GI,

delivered in a coherent manner across all the districts, is an essential requirement to meet the needs of the expanding population, and to ensure that sites designated for wildlife do not suffer adversely from increased recreational activities, including dog walking. Mechanisms will be required in the GNLP to ensure that GI is funded adequately and correctly managed and maintained going into the future.

118. *Anglian Water Services Ltd* - Water and sewerage companies prepare business plans on a 5 year investment cycle. Customer charges will be set following submissions from Anglian Water about what it will cost to deliver the business plan. Anglian Water's business plan for the next Asset Management Plan period (2020 to 2025) as part of which we are considering the implications of growth outlined in adopted and emerging Local Plans for Anglian Water's existing infrastructure.

To assist Anglian Water in making future investment decisions we are preparing two key long term strategies relating to the provision of water and water recycling infrastructure managed by Anglian Water as follows:

- Water Resource Management Plan (WRMP) for Defra's approval and
- Long Term Water Recycling plan.

The WRMP outlines the predicted supply/demand balance by water resource zones and identifies the proposals needed to meet the expected demand for additional water supply from new housing and development more generally. We also closely monitor growth in our region and develop investment plans to reduce flow and load from the catchment or provide additional treatment capacity when appropriate.

We are currently in the process of finalising a Long Term Water Recycling Plan which will set out a long term strategy to identify the need for further investment by Anglian Water at existing water recycling centres or within foul sewerage catchments to accommodate the anticipated scale and timing of growth in the company area. This document once finalised will be used to inform future business plans including the business plan currently being prepared for 2020 to 2025.

We have considered a range of solutions within sewer catchment or at the Water Recycling Centre to accommodate further growth as part of this plan. WRC upgrades will not be the most appropriate solution in all cases.

Anglian Water as a water and sewerage company seeks fair contributions through charges directly from developers under the provisions of the Water Industry Act 1991 to supply water and/or drain a site effectively. As such we would not, in most cases, make use of planning obligations or standard charges under Planning Legislation for this purpose.

Charging mechanisms will soon be simplified, with most companies now introducing a standard charge for all new dwellings which will be used to fund network improvements. Further information relating to the charges which will come into effect from 1st April 2018 is available to view at the following address:

<http://www.anglianwater.co.uk/developers/charges/>

It is important that any Local Plan policy relating to planning obligations/standard charges also emphasises the need for phasing and the use of planning conditions/obligations, to ensure development is aligned with the provision of water and water recycling infrastructure for this purpose. We suggest that the following wording be included in the new Local Plan:

‘Consideration must be given to the likely timing of infrastructure provision. As such, development may need to be phased either spatially or in time to ensure the provision of infrastructure in a timely manner. Conditions or a planning obligation may be used to secure this phasing.’

We would also ask that Greater Norwich Local Plan includes a policy which is supportive of the principle of water and water recycling infrastructure and development which supports this infrastructure being acceptable in principle in the countryside to ensure that we can continue to facilitate development in the company area.

See also comments against Question 9.

119. *CPRE Norfolk* – The only transport infrastructure mentioned in this section is related to roads. We feel it is essential to prioritise Public Transport, Bus Rapid Transit and local rail/ tram services if sustainable growth is to be delivered. Transport infrastructure improvements are much more easily achievable if development is concentrated in and around Norwich. This does not necessarily mean building on green fields around the city, as other options should be fully utilised first, such as conversion of spaces above retail premises into accommodation, and more building upwards, as suggested by the Prime Minister in her speech of 5th March 2018.

120. *Department for Education* – The Local Plan should identify specific sites (existing or new) which can deliver the school places needed to support growth, based on the latest evidence of identified need and demand. The current consultation does not include a draft Infrastructure Delivery Plan (IDP) or any other evidence that fully explains the effect of the site options on schools in the Greater Norwich area. While the Interim Sustainability Appraisal refers to capacity issues in some secondary schools, the GNLP should be supported by a full assessment of education requirements arising from housing growth, the extent to which existing schools can expand, and the approximate cost of doing so. This assessment should set out clearly how the forecast housing growth at proposed site allocations has been translated (via an evidence based pupil yield calculation) into an identified need for specific numbers of school places and new schools over the plan period. This would help to demonstrate that the approach to the planning and delivery of education infrastructure is justified based on proportionate evidence. If required, the ESFA (Education Skills Funding Agency) can assist in providing good practice examples of such background documents relevant to this stage of your emerging plan.

The site allocations or associated safeguarding policies should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. In particular, the ESFA advises caution where housing development would prevent a school from being able to expand in the future, such as at Foulsham where site options are being considered. The county council’s advice on safeguarding land for future expansion should be accorded significant weight.

While it is important to provide clarity and certainty to developers, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. The

EFSA therefore recommends the GNDP consider highlighting in the next version of the Local Plan that:

- specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that

- requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.

121. *Climate Hope Action In Norfolk* – Climate mitigation and adaptation must also be considered. E.g. enhanced public transport and infrastructure to support walking and cycling and re. adaptation: consideration regarding impacts on transport infrastructure in periods of hot weather, increased flood risk and the need for creative efficiency in water management.
Planning of housing development must also more actively take in to account provision of expansion in local schools, GP surgeries and access to health services.
Additionally, the current policies have supported considerable new road infrastructure: which locks in carbon-intensive infrastructure for decades to come. This emphasis needs to be urgently addressed and changes in direction made for all future planned transport infrastructure.
122. *Pelham (South Wymondham) Ltd represented by DHA Planning*
Pelham has proposed a masterplan led urban extension that would deliver substantial *improvements* to the local road network, a new school, employment and retail opportunities and substantial elements of publicly accessible open space.
123. *Glavenhill Strategic Land represented by Lanpro Services Ltd*
Further strategic green infrastructure is required in accessible location to meet existing deficiencies and to reduce the impact of planned new development on The Broads. The relocation of the existing Mulbarton Doctor’s Surgery to larger purpose-built premises within land identified as part of our Mulbarton site submission should be one such priority. Capacity at the surgery is already stretched for the existing community and there is limited scope for expansion on its existing site because of its constrained location. The proximity of the surgery to the school adds to congestion and vehicle conflict. Glavenhill Strategic Land are willing to provide the site at nil cost to enable this to happen, but there will be a need for additional funding and this should be planned for now.
Developing at scale to provide new settlements allows the delivery of essential facilities that not only benefit the occupiers of the new dwellings, but also existing and nearby communities.
124. *Silfield Limited, Nigel Hannant, Glavenhill Strategic Land represented by Lanpro Services Ltd*
There is a need for investment particularly on key infrastructure. The opening of the NDR will help to facilitate growth to the east and north of the city. It is also likely that improvements will be required to A47 southern bypass junctions, e.g. Thickthorn, Longwater to ensure sufficient capacity. Opportunities for better public transport linkages including rail and bus also need to be properly considered. Enhanced links into Cambridge and London, with the return of local rail links, such as in the Wymondham area creates an exciting opportunity for a strategic transport strategy, which will

promote growth arising from the A11 route, as well as improved rail, which will support a modal shift.

We also consider that it is essential that healthcare and social services requirements including GP surgeries, care facilities and specialist care are properly assessed and planned for at an early stage. We consider that, where appropriate, there should be a commitment towards using New Homes Bonus generated by new developments to help fund Healthcare facilities where there may be funding shortfalls. Furthermore, specific healthcare priorities should be identified for funding through the Greater Norwich Growth Programme (Infrastructure Plan) funded by CIL.

125. *Promoter of Site GNLP1054, MAHB Capital, Dennis Jeans Properties represented by Lanpro Services Ltd*

There is a need for investment particularly on key infrastructure. The opening of the NDR will help to facilitate growth to the east and north of the city. It is also likely that improvements will be required to A47 southern bypass junctions, e.g. Thickthorn, Longwater to ensure sufficient capacity. Opportunities for better public transport linkages including rail and bus also need to be properly considered.

Developing at scale to provide new settlements allows the delivery of essential facilities such as new GI. This is far more secure than the pooling of planning contributions which often fails to deliver.

126. *Norwich International Airport represented by Barton Willmore* - Whilst not essential for Site 4 (GNLP1061) at the Norwich Airport, the completion of the 'Western Link' would connect the NDR with the A47, thereby creating an outer ring road for the city. This would improve the connectivity of the region and prevent congestion in the city centre. It is positive that Highways England has committed over £300 million to improve the A47, including the A47/A11 Thickthorn interchange. These improvements will prevent congestion increase connectivity in the region. The road improvements will also contribute to the overall growth of the region including job increases.

127. *Harvey and Co* - It is necessary to concentrate development on fewer, larger areas, for which a comprehensive delivery programme of all aspects of the development can be established because the scale and quantum exists to generate viability for such infrastructure.

128. *Landowners Group Ltd represented by Barton Willmore* - 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. 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.

129. *Trustees of JM Greetham No.2 Settlement represented by Barton Willmore* - Small and medium sized allocations would be less dependent upon major infrastructure provision. Nevertheless, there are primary school capacity issues in the south-west sector of the plan area which could be negatively impacted even by small and medium scale housing development. Ensuring that there is sufficient land available and secured to enable the enlargement of primary schools, particularly in village locations, will be essential.

130. *Promoter of Site GNL0353 represented by Pigeon Investment Management Ltd* - The scale of growth that is already committed in Greater Norwich requires a considerable amount of infrastructure upgrades and new infrastructure to deliver it. Permitting growth in locations such as Reepham may allow for more development to come forward within existing capacity limits, or in areas where the upgrades are more affordable/easy to deliver. However this should be restricted to locations such as Reepham which play an important role in serving their rural hinterland.
131. *Otley Properties represented by John Long Planning* - Dispersal approach to accommodating a proportion of housing to a number of rural settlements may allow for more development to come forward within existing capacity limits in rural areas, or in areas where the upgrades are more affordable/easy to deliver. For instance, providing an extra classroom to a school in *the* rural area is more straightforward than providing a new school in an urban area/strategic growth location. A number smaller allocations dispersed across a wider rural area will provide a better opportunity to bring forward 'early' development within existing infrastructure capacities, or *require* 'smaller' and therefore more affordable infrastructure upgrades, compared to strategic/large sites.

Detailed responses from parish councils

In addition to the above comments, the following detailed responses concerning locally specific infrastructure needs were received in response to Question 10 from *Dickleburgh and Rushall* and *Cantley Parish Councils*.

Dickleburgh and Rushall

THE GNL0 AND FUTURE DEVELOPMENT IN OUR VILLAGES: A POLICY STATEMENT BY DICKLEBURGH AND RUSHALL PARISH COUNCIL

As a community, Dickleburgh and Rushall are committed to playing their part in the GNL0's plan for future housing. We believe some new housing particularly that which is affordable, is important for the future health and prosperity of our village.

At the same time, it is essential that this growth is sustainable, proportionate and sited so that it does not place an intolerable strain on the infrastructure and character of our villages.

After careful discussion of the development options, two public meetings with residents and an opinion poll within Dickleburgh, the Parish Council has reached the following conclusions concerning future housing development:

1. The response to the call for sites has so far produced 13 proposals around the village of Dickleburgh.
2. Currently, the most urgent problem facing Dickleburgh concerns roads. Each of the three road in the centre of the village is already experiencing major traffic problems. It is essential, for reasons of safety to residents and drivers, that these are not exacerbated. The Street is an extremely narrow road which, in spite of 20mph speed limit (widely ignored by drivers) struggles to cope with traffic, in particular heavy goods vehicles going to and from the Smurfit Kappa depot in Rushall. Rectory Road, with houses on each side, parked cars and no pedestrian crossing has become very dangerous to pedestrians. Again, lorries from Smurfit Kappa are the main problem.

Harvey Lane, a narrow road on which the school, playground and village centre are situated, has had widely-publicised problems of congestion which will be worsened by a development of 22 houses, currently under construction.

3. The Parish Council is determined that what is already a bad and dangerous traffic situation in Dickleburgh must not be made worse by any new housing development. For this reason, we believe that any future development should take place to the south of the village off the Ipswich Road (GNLP0350 and GNLP0498; if there are problems with those sites, we favour GNLP0498).

4. New houses on that side of the village would provide residents with safe and easy pedestrian access to the village services, without adding to Dickleburgh's traffic problems.

5. We strongly oppose any potential sites that will add to the traffic on the three roads mentioned above. Our opposition includes sites on the Norwich Road to the north of the village. Local experience has shown that drivers will avoid the difficult junction on to the A140 to the north of the village, preferring to use the roundabout to the south. In other words, any Norwich Road development would add to pressure on The Street.

6. A survey for our proposed Neighbourhood Plan revealed, in addition, that residents on the Rectory Road greatly value the prospect from the village of Dickleburgh Moor, which is being developed as a wildlife site. In other words, development off the Ipswich Road has the added advantage of causing least harm to amenities enjoyed by current residents.

7. Dickleburgh Primary School, of which we are very proud, is now reaching capacity and will have no further potential for expansion.

8. We are also concerned that the village sewage system has limited capacity. There is a risk of flooding to the north of the village.

9. As a more general point, we believe that excessive loading of new houses on to rural villages would be environmentally irresponsible, increasing dependence on cars to drive to work, shop and deliver children to school.

CONCLUSION

The Parish Council believes that any future plans for housing must be in proportion to our current population and should not place an intolerable strain on village infrastructure. Sensible, proportionate development to the south of Dickleburgh will retain the integrity and vitality of our village, while making a positive contribution to the county's housing needs.

Cantley

Cantley has already seen a large number of developments built or approved in neighbouring parishes. The local infrastructure cannot cope with what is happening now and the council has specific concerns about:

- The capacity of the access to the A47. The existing planning consents have taken forecast flows to the limit of the capacity.
- The provision of essential local services including healthcare and schools. There is no capacity to cope with the impact of the housing which is being proposed. There are no credible proposals to improve the situation.
- The capacity of the Postwick Hub if large housing developments occur in the locality: were these housing proposals factored into the traffic flow forecasts when the junction was designed? We already have tailbacks onto the A47 from the slip road that are as bad as before the improvements to the 'hub'; significant additional flows through that junction as a result of housing growth and the NDR won't improve the problem.

- Loss of Grade 1 or 2 agricultural land at a time when there is concern post-Brexit about food security.
- The ability of the water supply and treatment infrastructure to service the proposed housing developments in and near the parishes.

Given the extent of development experienced under the current Local Plan in neighbouring parishes the Parish Council opposes all the proposed sites within the parish put forward in the GNLP: the parish needs time for the infrastructure issues to be addressed by bodies such as NCC.

DRAFT

EXISTING DEVELOPMENT COMMITMENTS

Question 8

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

There were 114 individual responses to question 8. Of these, 53 respondents said Yes, 36 said No and 25 selected neither option, either making no substantive comment or submitting additional comments.

Summaries of Specific Comments

Yes

Of the respondents who replied **yes**, the following general comments were made by private individuals:

1. Your own housing delivery figures still running below target and several thousands of consented dwellings without action.
2. Land-banking of sites by developers who make money by not building houses - and getting more land.
3. Historically, nationally we build less houses than we plan to. So perhaps that also means we tend to over-estimate demand. Another reason for not adding an extra 7200 homes now.
4. The failure to deliver on historic (lower) housing commitments indicates it is most unlikely that the new ones will be met.

Of the respondents who replied **yes**, the following comments were made by parish councils, developers and landowners and their agents and other organisations.

5. *Costessey Town Council* - This depends on the housing market and the general economic situation, not on planning permissions granted or land allocated. Developers will not build houses in an economic slump they will reduce production until the economy is buoyant; they do not want to build when house prices are lower; they want to maximise profits.
6. *Wroxham Parish Council* - Evidence suggests that all delivery forecasts have fallen short so far,
7. *Drayton Parish Council* - Currently landowners are land banking approved sites. This must not be allowed to continue.
8. *Hellesdon Parish Council* - Land banking by developers to maintain the housing shortage and consequent high prices
9. *Hempnall Parish Council* - Given that there is a current commitment of 35,665 dwellings (April 2017) yet to be built within the existing plan and the average annual built rate (2001 to 2017) is around 1,500 it will take almost 24 years to exhaust existing allocations. Therefore it is highly likely that the existing housing commitment will not be delivered by 2036.
10. *Bramerton Parish Council* – The existing house building rate is slower than the annual requirement. Sites for development are being land banked against an uncertain

economic housing market.

Housing construction is slower than annual growth required. Allocated sites are not being utilised.

11. *Thorpe St Andrew Town Council* - pressure should be put on national government and developers to look at ways of getting schemes with permission started in a timely fashion. This is evidenced by the Pinebanks and Brook Farm sites in Thorpe St Andrew.
12. *Reepham Town Council* - no planning applications have yet been received for the existing sites allocated under the previous JCS.
13. *Poringland Parish Council* - there is evidence. In the year 2000, 1,000 permissions were in place in Poringland. Of that 1,000, 400 have been built in 18 years and many more permissions have been given. What guarantee is there that the existing permissions (around 600 of the original) will be completed by 2036? More recently, there has been an increasing improvement in the delivery of homes and sites.
14. *Framingham Earl Parish Council* - the present slow rate of building of the existing commitment, which if it continues at this rate it will not be met until at least 2041.
15. *Wensum Valley Alliance* - the annual monitoring report.
16. *Cringleford Parish Council* - as shown by delays in existing developments.
17. *CPRE Norfolk* - there is evidence that the existing housing commitment will not be delivered by 2036, as the historic build rate is 1,537 per annum (from the AMRs 2001-2016) and if this continues existing commitments will last until nearly 2040. This clearly shows that phasing is a sensible option. Steps need to be taken to ensure that housing need is met, especially in terms of delivering affordable houses. To this end when permissions are granted it is most important that full affordable housing quotas are insisted upon, and are built. It is to be hoped that national policy will make moves to prevent land banking, and to bring in systems to ensure permissions are built out within a set time.
18. *Woods Hardwick Planning Ltd* - there is evidence that over the past decade the quantity of new homes delivered in the GNLP area has not kept pace with targets. Slower than required delivery rates have resulted in inadequate five year land supply positions. Great Norwich's Annual Monitoring Report dated January 2017 states that although housing delivery has improved in recent years, the number of completions remain well below target including affordable housing targets. Therefore, the quantity of homes planned will need to be increased by a buffer of 20% to be treated as part of their housing target. The GNLP should seek to allocate a range of different sizes of sites that would result in sustainable development which would provide wider opportunities for ownership and create sustainable mixed communities.
19. *Bidwells* – It is requested that the site allocated under Policy CC16 of Norwich City Council's Site Allocations and Site Specific policies plan is retained. The site allocation remains entirely deliverable, and capable of making a significant contribution towards satisfying the Councils' housing needs during the period up to 2036 in a highly sustainable City Centre location. In addition, the development will, through provision of a car park, ensure the safe and successful functioning of Norwich City Football Club (NFC). On this basis, the site should be retained as an allocation for residential led mixed use development.
20. *DLBP Ltd* - **Yes**, at the current time the Norwich Policy Area, consisting of Broadland Council, Norwich City Council and South Norfolk Council only have a 4.61 year housing land supply when calculated against the Joint Core Strategy (draft Annual Monitoring

Report 2016 - 2017). Therefore there is no certainty that the existing housing commitments across these areas will be delivered by 2036. By refusing planning permission for developments outside of the settlement limits, and continuing to apply the Liverpool methodology in calculating its five year housing land supply requirement, Broadland Council is not making every effort to meet its housing need. The proposal at Racecourse Plantations would assist in addressing this housing need, by contributing 300 new homes.

21. *Wood Plc - Yes*, The persistent patterns of under delivery in the GNLP area (as noted in the response to question 4) and an over reliance on large strategic allocations in the urban area does not provide a positive framework to plan for future needs. There is a benefit to allocating a range of sites in the main urban area and the rural hinterland to provide a deliverable plan. It is questionable whether a strategy which relies on large sites in the urban area to deliver, where there has been a consistent pattern of under delivery will be effective. There is likely to be future pressure on housing delivery later in the Plan Period if the current trends of under delivery persist. Therefore, a strategy focussed solely on the urban area should be avoided over risks of deliverability and the ability of the market to absorb that quantity of new housing. To ensure that the emerging GNLP is found sound the Councils should focus growth on locations with significant areas of land available free of strategic constraints which can deliver the requisite need, such as Wroxham. This can play a complimentary role to the growth aspirations of Norwich.
22. *Barton Willmore on behalf of Landowners Group Ltd* - 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. 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.
23. *Barton Willmore on behalf of Trustees of JM Greetham No.2 Settlement*. It will be critical that deliverable sites in suitable locations such as Spooner Row where people want to live, which can be delivered quickly are selected, as compared to the creation of say, a new Garden Village which will require substantial upgrades to existing infrastructure and significant new infrastructure with exposure to the real risk of delivery delay. The new annual target for 2017 – 2036 (assuming 42,887 dwellings) will represent an annual requirement of 2,257 dwellings per annum. 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.
24. *Lanpro Services Ltd on behalf of the promoters of Sites GNLP0487 and Site GNLP1054; Nigel Hannant; Dennis Jeans Properties, Glavenhill Strategic Land and Silfield Limited* - There has been a track record of persistent under delivery of housing within the Norwich Policy Area since the adoption of the current JCS. This has necessitated the addition of a 20% buffer to the calculation of five-year supply of housing land in the Norwich Policy Area. Although at this stage we are not aware of any hard evidence that the

commitment will not be delivered by 2036, we do believe that it should be treated with caution and it is therefore essential that an adequate buffer is added to the housing requirement figure in order to mitigate both under delivery of the commitment and of new allocations.

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

No

Upton with Fishley; Thurton; Scole; Hainford; Burston and Shimpling and Salhouse Parish Councils and the *Diss and District Neighbourhood Plan Steering Group* all responded **No** without adding any further comment.

Of the remaining respondents who answered **No**, the following comments were made by parish councils, developers and landowners and their agents and other organisations. Several agents on behalf of landowners and developers supplemented their response by arguing the merits of specific development sites either being promoted through this consultation for potential allocation in the GNLP, or subject to an existing allocation in an adopted local plan.

1. *Costessey Town Council* - This depends on the housing market and the general economic situation, not on planning permissions granted or land allocated. Developers will not build houses in an economic slump they will reduce production until the economy is buoyant; they do not want to build when house prices are lower; they want to maximise profits.
2. *Kimberley and Carleton Forehoe Parish Council* – No. The Council is unsure about evidence, but does feel that the existing housing commitment should be delivered. Even if this number of houses could be built social cohesion could not be maintained.
3. *Great Yarmouth Borough Council* - The Council notes that there does not seem to be any indication, in paragraphs 4.18-4.25 of the Growth Options document, that the Greater Norwich authorities will not be able to meet the proposed additional housing growth of 7,200 dwellings, and therefore that no request has been made of the Council to potentially take any unmet housing need. The Council has no such evidence either, and so in answer to Question 8, the Council has no evidence that the existing evidence that this scale of growth will not be able to be delivered by 2036.
4. *Anglian Water Services Ltd* - Anglian Water is the land owner of **Site R31: Heigham Water Treatment Works, Waterworks Road** which is allocated for housing in the adopted Norwich City Site Allocations Plan. We continue to support the allocation of this site for housing as it is both available and deliverable within the plan period of the new Local Plan.
5. *Bidwells* on behalf of the *Norfolk and Suffolk NHS Foundation Trust* - Based on the foregoing, the below allocated site is still available, achievable and deliverable.
HEL 1 - Land at Hospital Grounds, southwest of Drayton Road, Hellesdon (approximately 14.7ha) is allocated for residential (approximately 300 homes) and B1

employment uses. On behalf of Norfolk and Suffolk NHS Foundation Trust, we write regarding the land at Hellesdon Hospital, southwest of Drayton Road that is allocated in Broadland District Council's Site Allocations DPD (2016) under Policy HEL1 for development of approximately 300 homes and small-scale employment uses. On this basis, the site should be retained as an allocation, and is capable of making a significant contribution to the planned growth of Norwich in the period to 2036.

6. *Bidwells* on behalf of *G.N. Rackham and Sons Ltd*

DIS 3: LAND OFF DENMARK LANE, DISS, NORFOLK. On behalf of G.N. Rackham and Sons Ltd (hereafter referred to as 'the Landowner'), we strongly support the continued allocation of the above mentioned site for residential development. The landowner is in the process of preparing a planning application for residential development on the site for approximately 42 units. Survey and design work to inform the preparation of a planning application has commenced and it is envisaged that a planning application will be submitted within the next 6 months. Given the number of units that can be accommodated on the site, it is assumed that following the grant of planning permission the site would be delivered in approximately 24 months. On this basis, the site should be retained as an allocation, and is capable of making a significant contribution to the planned growth of Norwich in the period to 2036.

7. *Bidwells* on behalf of *Poringland Properties Ltd*

POR 4 - Land south of Stoke Road, west of The Street and north of Heath Loke. On behalf of Poringland Properties Ltd, we write regarding land south of Stoke Road, west of The Street and north of Heath Loke. The land is allocated for residential development in South Norfolk District Council's Site Specific Allocations and Policies Document DPD (2015) under Policy POR 4. The allocation comprises three parcels of land, with much of the allocation being previously developed under planning permission 2010/1332. The parcel of land to which this response refers is land adjacent to The Ridings, which is estimated to have potential to accommodate circa 20 residential units. On this basis, the site should be retained as an allocation for residential development, given it is capable of making a significant contribution to the planned growth of Norwich in the period to 2036.

8. *Bidwells* on behalf of *Norwich City Football Club*

CC16 Norwich – Triangle Site, Carrow Road, Norwich NR1 1HU - It is requested that the site allocated under Policy CC16 of Norwich City Council's Site Allocations and Site Specific policies plan is retained. The aforementioned planning permissions have demonstrated that they can accommodate a high density of residential development ranging from 200 to 274 residential units per hectare. The whole Triangle Site is owned by Norwich City Football Club and there is no reason why development cannot come forward immediately. On this basis, the site should be retained as an allocation for residential led mixed use development.

Neither

The following organisations either did not feel able to comment due to lack of knowledge, commented further or expressed reservations about a definitive opinion either way, some suggesting that evidence on deliverability would need to be refreshed at regular intervals as economic cycles influenced the capacity of the development industry to bring sites forward.

1. *Brundall Parish Council* – did not know whether or not there was any such evidence.
2. *Tivetshall Parish Council* – did not wish to comment
3. *Climate Hope Action in Norfolk* - Possibly. However, this may be mitigated if Norwich were to deliver an exciting and aspirational plan to actively address climate challenges and develop a modern, sustainable community: this may inspire more interest.
4. *Pigeon Investment Management Ltd on behalf of the promoter of sites GNLPO352 and GNLPO353* - Pigeon suggest that there will be a series of economic cycles during the lifetime of the Plan and it is not possible to know what the likely impact on delivery of the existing housing commitment will be. The ability of the public sector to unlock development by providing up front loans and grants particularly for infrastructure, as a way of ‘smoothing’ development cash flow will certainly help the delivery of committed sites. Additionally, where commitment requires access rights over railways or railway land or other third parties are involved, the negotiations to obtain the necessary rights can be protracted, and potentially costly. The Local Authority should have a role in helping to overcome and speed up such negotiations.
5. *John Long Planning on behalf of Otley Properties*. Otley Properties Ltd suggest that there will be a series of economic cycles during the lifetime of the Plan and it is not possible to know what the likely impact on delivery of the existing housing commitment will be. For these reasons, it is considered appropriate to add a ‘delivery buffer’ to the overall housing figures.
6. *Armstrong Rigg Planning on behalf of Westmere Homes* – (Summary of response): At this stage we cannot conclude that the delivery of the existing housing commitments described in the Site Proposals document are incapable of being delivered prior to 2036 – there will inevitably be significant shifts in both market demand and the size of the construction sector labour force throughout the plan period. What we can conclude, though, is that the front-loading of the delivery of these sites set out in the current AMR trajectory within the first 10 years of the plan period is entirely unrealistic.
7. *CODE Development Planners Ltd on behalf of Ben Burgess and Drayton Farms Ltd* - Our particular concern on this point is the over- reliance on the delivery of an unusually large number of homes within the Growth Triangle and adjacent fringe parish of Thorpe St Andrew in the north-east Sector of the Norwich area. Existing commitments already amount to 12,976 (Fig 3 of Growth Options Document). All six growth options contain baseline allocations of a further 200 homes, with Growth Options 1, 2 and 6 suggesting the possibility of an additional 1200 homes. In this relatively small area of the north-eastern fringe parishes there is, therefore, an assumption that the market could accommodate and sell an average annual delivery rate of between 732 and 788. Development is concentrated in the area on a relatively small number of large sites where a relatively small number of housebuilders will be competing for sites and sales. The most likely reaction of the market in such circumstances will be to look to invest in less competitive and saturated locations.
8. *Harvey and Co* - There is clear historic evidence, as recognised in the document, that housing sites can take longer to come forward than expected. This can be a consequence of a range of factors, a principal one being difficulties with viability due to the associated infrastructure required where insufficient quantum of development exists to create the value required to fund infrastructure. There is evidence of delay on certain sites in this respect – Easton and Long Stratton for instance.

9. *Carter Jonas LLP* on behalf of *Taylor Wimpey* and *Martin Skidmore* - We request that a robust assessment of housing delivery is undertaken to update the housing trajectory, with realistic assumptions about start dates and delivery rates for the larger sites in particular. For complex developments it typically takes a number of years to negotiate the outline planning stage including the agreement of planning obligations, discharge conditions, market the site and complete agreements with housebuilders, obtain reserved matters approval, deliver primary infrastructure and commence development. It is the small and medium sized sites that do not require significant levels of new infrastructure which are easily deliverable and can help to maintain an adequate housing land supply. It is those small and medium sized sites which are owned by a willing landowner or controlled by a housebuilder, and which are in locations where there is demand from housebuilders/developers for sites and the housing market is strong, where housing delivery tends to be straightforward.

DRAFT

GROWTH DISTRIBUTION OPTIONS, SUPPORTING INFRASTRUCTURE, NEW SETTLEMENTS AND THE GREEN BELT

Question 9 – Which alternative or alternative [growth options] do you favour?

A total of 274 separate responses were received to this question, which allowed respondents to select more than one growth option if applicable. In total:

- 102 respondents favoured **Option 1** (concentration close to Norwich)
- 65 favoured **Option 2** (transport corridors)
- 74 favoured **Option 3** (supporting the Cambridge-Norwich tech corridor)
- 32 favoured **Option 4** (dispersal)
- 23 favoured **Option 5** (dispersal plus new settlement)
- 25 favoured **Option 6** (dispersal plus urban growth)

A significant number of respondents (66, almost a quarter) did not select any of the presented options but provided general comments either putting forward alternative growth scenarios or questioning the need for growth at all. 124 respondents (45%) selected one option only, 83 (30%) selected two or more.

Overview

There was a broad and varied response to this question, with Option 1 being the single most favoured growth option and Option 3 the second most favoured, but a significant minority of respondents selected none of the presented options and argued in favour of alternative scenarios.

Neighbouring local authorities expressed an interest in discussing the options with the GNLP team. Answers from parish councils generally emphasised concerns about traffic; access to jobs and services; the availability and capacity of infrastructure; urban sprawl; and potential impact on the landscape. Several stressed the importance of growth being proportionate to the local context.

New Anglia LEP, Natural England, Historic England, Highways England, Anglian Water and Norwich Clinical Commissioning Group (CCG) did not single out any option as being preferable. The Campaign for the Protection of Rural England (CPRE) questioned the baseline growth assumptions and strongly favoured concentration. Norwich and Norfolk Transport Action Group (NNTAG), Norwich Cycling Campaign and Norwich Business Improvement District (BID) favoured concentration. The Green Party and others who supported options 1 & 2 supported their views with a petition to co-locate housing and services. Norfolk Wildlife Trust and others emphasised the potential biodiversity value of brownfield land. The Home Builders Federation questioned the suitability of the sites submitted for new settlements.

Parish councils generally emphasised the need for infrastructure to be in place before development, and for existing commitments to be considered both in delivery terms and within the overall need. Dispersal options were associated with infrastructure constraints (frequent comments included roads, education, sewerage, health care, and water supply,

with some concern also expressed about broadband connections, public transport, loss of agricultural land, landscapes and wildlife sites).

Highways England stated that Thickthorn interchange would experience the greatest impact for all options, and that the impact on the A11/B1335 junction to the north of Wymondham is likely to be significant, with option 3 predicted to be the worst for this junction and the strategic road network as a whole. Each option results in notable impacts on the majority of key junctions, but it was stated that without a known strategic direction, the eventual impact on trunk roads is unknown. Highways England supported the co-location of homes and jobs to take pressure off the strategic highway network. They also recommended that a suitable evidence base is prepared to assess the impact of the eventual preferred growth option to identify public transport and road infrastructure measures needed.

Norwich CCG identified health infrastructure constraints associated with 'large scale growth' and illustrated this related to a new settlement. Suffolk County Council identified traffic constraints as an issue which should be considered.

Option 1 – Concentration Close to Norwich

Option 1 – concentration close to Norwich was the most popular option. Comments made in support of Option 1 were:

1. The least environmental impact and safeguarded agricultural greenfield land for farming;
2. Immediate countryside around Norwich should be designated greenbelt;
3. Preserve the character and quality of life of villages and the countryside. Take pressure off settlements that may have borne more than their fair share of development in current local plans;
4. Maximise use of sustainable transport modes and lead to least reliance on car journeys;
5. Development should only take place where services can be accessed on foot or by public transport, anything else will increase car dependency. No evidence that major allocations in rural areas increase social sustainability. Options should be robustly tested for impact on greenhouse gas emissions, air quality and nature conservation and should be accompanied by a plan for significant improvements in local bus and rail services;
6. Provides for housing close to employment opportunities, leisure facilities and existing infrastructure;
7. Easier to provide for infrastructure requirements and requires the least amount of new infrastructure. In a rural county such as Norfolk housing should be concentrated where there is already established infrastructure;
8. Highly accessible locations should be prioritised for economic and community infrastructure uses;
9. Allows for high density development which would look out of place in villages, however urban over densification would undermine place quality and place competitiveness of central Norwich. Plenty of permissioned land on urban fringes in well served locations;
10. Planned urban extensions to the city fringes should be prioritised for delivery e.g. Broadland Gate, UEA/NRP, north of city at Royal Norfolk site/Sweetbriar/Hellesdon hospital, expansion/intensification at Thorpe Marriott and other sites in vicinity of NDR;
11. Build on brownfield sites first in a phased approach before identifying new sites. New sites should be phased after JCS sites have been completed, unlikely to be required if build rates remain as they currently are. Opportunities for brownfield intensification of uses in highly accessible locations;

12. Local/light rail movement infrastructure should be planned into edge of urban schemes e.g. along Marriott Way, potential university connection, potential circular tram/train route from Broadland Gate to airport and Hellesdon;
13. Travel to the city by bus and Park and Ride will reduce traffic congestion;
14. What does development 'close' to Norwich mean? Trowse/Bixley/Arminghall? 'Close' should mean within the A47/NDR;
15. *CPRE Norfolk* - strongly favours Option 1 as the most reasonable alternative in terms of the environment and wellbeing of residents. Question why the approach to the distribution of the 3,900 'baseline' houses has been taken and included in all options. At over 50% of the 7,200 requirement this is highly significant and is clearly a policy issue which should have been consulted on. Also question differences in the table in the Interim SA from the table in the June 2017 GNDR Board Papers suggesting that changes have been made to make several options appear to be equal in terms of impacts, instead of the earlier table which showed that concentration was the best options and dispersal the least reasonable option;
16. *Liberal Democrat City Council Group* - Strongly favour option 1. Sustainable development should be concentrated where there are services, employment, brownfield sites for development and also Norwich is the place that can take a greater density of development and needs the least amount of infrastructure;
17. *Norwich Business Improvement District* - the need to balance the amount of land required for housing and employment is a particular consideration in Norwich. The aim should be to enhance the vitality of Norwich for growth in housing and jobs;
18. *The Norfolk and Norwich Transport Action Group* - support Option 1 as it has the potential to reduce reliance on the private car and limit carbon emissions. Opposed to a new settlement at Honingham as this would be almost entirely dependent on access by car and lorry. Strongly oppose Options 4 and 5 as they would be largely car reliant. Disagree with the Interim SA evaluation of different growth options in relation to climate change,
19. *Norwich Cycling Campaign* - support Option 1 as they believe it will provide the opportunity for developing communities with good local facilities, capable of being served by public transport and commutable by bicycle. Alternatives to motor vehicle journeys are more difficult to achieve under other options. They would like to see more of a commitment across the three councils and the Highways Authority to apply policies which support sustainable development more consistently;
20. *Norwich Green Party* - option 1 or 2 are acceptable starting points but a few basic principles should be followed to ensure that these allocations meet the needs of Greater Norwich residents:
 - The location of new development should pay particular regard to the provision of public transport routes. If they are not served by existing routes, new public transport infrastructure must be provided for before they are occupied so that, from the outset, residents will not be reliant on private car ownership.
 - Consideration must be given to whether a form of development is possible that will allow for services – including schools, shops, health services and leisure facilities – to be accessible on foot or by bicycle, and sites should not be allocated where such access to services is not possible. Note that for some sites, this principle could be achieved by allocating a new district centre on the site itself where such services are provided. Note also that this could support the principle of denser developments.

- Consideration must be given, and weight given to, the need to preserve the biodiversity and ecological value of land, especially within the river valleys, but also in other locations, including applicable brownfield sites and railway lines.
21. *Climate Hope Action In Norfolk* - CHAIN is strongly in favour of options that are closer to services and transport infrastructure and opposes dispersal options. Concentration around Norwich needs to be done sensitively with restrictions to preserve the city's character and historic sites. Therefore, in the context of climate change, as well as other considerations, options 1 and 2 are considered acceptable options. They are also clearly acknowledged in the GNLP to be better re. air quality, traffic, climate considerations, encouragement of walking and cycling and development.
 22. *Brown and Co on behalf of Building Partnerships* - favour Option 1 as Norwich is the main economic driver for the Greater Norwich Plan and arguably the county as a whole. In terms of generating jobs and enhancing the local economy the majority of growth has to be focused on the Norwich Policy Area.
 23. *DLBP Ltd* - Option 1 and Option 2 are considered the most appropriate. This is because both options provide good access to services and jobs, which are key planning considerations. If the new homes are close to Norwich, or located near transport corridors, residents will have good access to jobs, services and other facilities that are necessary for a good quality of life.
 24. *Pegasus Planning Group on behalf of Barrett David Wilson Homes* - My client favours option 1 and 3 as this would allow for their site at Cringleford (GNLP0307) to come forward. That is not to say that a blend of the other options would be inappropriate and it is noted that this is acknowledged as a possibility in paragraph 4.65. BDW considers that it is right for the eventual strategy to focus a large proportion of development in the area around Norwich and believes that Cringleford is an appropriate location for a large proportion of this requirement. Further submissions on this have been made under the Sites Proposals consultation. BDW can confirm the deliverability of the existing commitment at Cringleford (Newfound Farm), which will be submitted for Reserved Matters approval in the coming weeks following detailed pre-application discussions.
 25. *Carter Jonas LLP on behalf of a client* - The proposed growth strategy needs to be based on the principles of sustainable development, as set out in the NPPF. The findings of the Sustainability Appraisal should inform the option which is selected. The growth strategy should seek to direct development to locations which contain a good range of services and facilities and employment opportunities and are accessible by walking, cycling and public transport, or where these matters can be improved in conjunction with development. The preferred growth locations should have no significant constraints or where mitigation measures can address those significant impacts.

A growth strategy based on the dispersal of development away from Norwich and the larger settlements would not meet the principles from sustainable development. It would increase the levels of in-commuting into Norwich for employment opportunities and it is less likely that sustainable transport options would be available for journeys to work and for other purposes. The cost of providing or upgrading transport infrastructure to address the shortcomings of a dispersal strategy would need to be funded by development and from public sources; it would be inappropriate for City Deal funding to be used to address an unsustainable development strategy.

We support the growth options which direct additional development to the Growth Triangle/edge of Norwich because these areas are sustainable locations for

development and are the most accessible; this approach is reflected in Options 1 and 2 and we support both these options.

26. *Barton Willmore on behalf of Landform Estates Ltd* - In respect of the 'Proposed Growth Options', it is first worth considering the merits of Drayton. The settlement is located within the 'Norwich Fringe' northwest area as defined in the emerging Local Plan. Furthermore, the Northern Distributor Road (NDR) has been constructed and will be fully open in spring. Due to its location, Drayton has been the focus of historical development and is considered a highly sustainable location that can accommodate future growth. 235 dwellings have been built in the settlement since 2006 (of the 37,500 allocated across the Joint Core Strategy to 2026).

Looking at the wider picture, the majority of the new Local Plan's housing requirement is committed, but the total requirement for new allocations (subject to appropriate testing) is at least 7,200. In order to ensure brownfield's sites are maximised and rural needs addressed, all options include a 'baseline position' which provides for 3,900 homes. Consequently, there are sites for a further 3,300 dwellings to be found under six differing strategic growth options.

Option 1 would concentrate development close to Norwich and include up to 600 new dwellings in the Northern Fringe northwest. Landform support this option and regard it as the most appropriate of all options. Norwich is the most sustainable location and new dwellings should be located close to Norwich to benefit from existing infrastructure.

27. *Bramerton Parish Council* - support Option 1 to contain urban sprawl and to prevent the spread of suburbia to differentiate Norwich from rural settlements.
28. *Brockdish and Thorpe Abbots Parish Council* – Concentration of growth in the Norwich area coupled with a strong green belt is the best choice for the environment and for achieving sustainable development.
29. *Cringleford Parish Council* - do not agree that there is a need for 7,200 additional homes but if forced to choose would support Option 1 to allow for more efficient delivery of services.
30. *Dickleburgh and Rushall Parish Council* – favour options 1 and 2 because although the community of Dickleburgh are committed to playing a part in the GNLP's future plan for housing it is essential that growth is sustainable, proportionate and sited so that it does not place an intolerable strain on the infrastructure and character of Dickleburgh. For environmental reasons, to avoid urban sprawl and to retain the essential character of our rural communities and landscape, the main concentration of new development should be where people work. Too much dispersal into villages will cause urban sprawl and compromise the rural character of our villages and countryside.
31. *Framingham Earl Parish Council* - Options 1 and 2 concentrate the development close to Norwich where there is reasonably good infrastructure and public transport. However in the Framingham Earl and Poringland area there has already over the years been a huge amount of development, twice as much as the whole of Norfolk for the period 2010/2017, 10% in Framingham /Poringland and only 5% for the whole of Norfolk. Already our primary and secondary schools are nearing capacity, before any of the sites currently being developed are finished and families move in. The road network is overloaded, and now the local lanes are seeing an enormous increase in traffic use. Further large scale developments in our area would totally overload the services and roads.

32. *Hempnall Parish Council* - support concentration close to Norwich as the best option and retaining the Norwich Policy Area within its current boundaries. They wish to remain within the Rural Policy Area and ask that current JCS policies that protect rural parts of Broadland and South Norfolk from excessive development should be retained.
33. *Kimberley and Carleton Forehoe Parish Council* - Option 1 makes the most sense, but would support Option 2 as well. Option 3 is not supported. Elements of Option 6 are supported to some degree. Historically modest scale building in the country has gradually spread out from cities, where the gradual progression of infrastructure and community can support it.
34. *Reepham Town Council* - To quote from the Foreword to the GNLP document, “sustainable access from homes to services and jobs will remain the key consideration for good planning”. Options 1, 2 and 3 are already best served with infrastructure, and are suitable for larger scale developments which the larger firms are able to provide. The railway to Cambridge, running alongside the A11/A14, forms a potentially invaluable communication link. Options 1, 2 and 3 are the Town Council’s favoured options. The statement that Options 4 and 5 “are more likely to address the draft plan delivery to deliver homes. This is because they provide for a much wider dispersal of development, and in doing so increase diversity, choice and competition in the market for land, which would be beneficial for delivery.” is disputed. These options are more likely to be served by windfall developments undertaken by smaller developers and builders; not only are these more likely to be built, because they are smaller scale and tend to have more local support but they are more likely to be sustainable than large scale developments. Options 4 and 5 are not favoured. Similarly, Option 6 is not favoured.
35. *Wrampingham Parish Council and Barford Parish Council* - particularly favour Option 1 – especially because of investment in the northern ring road; and Option 2 is logical due to the needs of people to get into Norwich. Regarding Option 3, although we believe there is a benefit to be had from a “Cambridge-Norwich Tech corridor”, it would be, in our opinion, ludicrous to put all the development eggs in that one basket. Options 3-6 seem to be lacking any strategic focus. However, some limited development of e.g. low-cost housing (i.e. 1 and 2-bedroom for example) to help youngsters get onto the housing ladder could be most helpful in villages across the County.

Hopefully Options 1 or 2 would also support more employment opportunities for people in the Greater Norwich area because the Parish Council recognise that some growth is needed to sustain village life and would particularly welcome more affordable housing. It is imperative however that our concerns are addressed in any permissions in order to avoid a detrimental impact on the existing settlement.

The growth options maps are deliberately vague and therefore unclear what effect they would have on Barford and Wrampingham. It is also unclear whether acceptance of a particular Growth Option would take precedent over the Settlement Hierarchy agreement, whichever one is adopted going forward,(please refer to Q24). If it was decided that Growth Options take precedent over the Settlement Hierarchy then we could not support Growth Options 1, 2 or 3 as large scale development could ruin Barford and Wrampingham.

36. *Wymondham Town Council* - The Town Council has undertaken an initial assessment of the emerging (Regulation 18) Greater Norwich Local Plan documentation and offers responses to the 6 options outlined. Option 1 - this proposes that apart from the baseline of 550 to be divided between the 5 Towns no further allocation will be made to

the Town of Wymondham nor will there be any increase on the 1200 to be allocated to Other. This was considered to be the best option although the exact number cannot be identified for the Town it will not exceed 550 and in all probability will be much lower.

Although there was strong support for option 1 there were also some comments made against this option:

1. Concentrating development around Norwich and outlying villages could lead to urban sprawl and impact on quality of life. The northeast growth triangle and development at Thorpe St Andrew will have a massive impact on the feel and size of the city.
2. If Norwich growth area is extended out via Hellesdon, Horsford and Horsham St Faith, Hainford should not be included because of its rural nature and development constraints.
3. Accept that growth is likely to be concentrated on Norwich but do not think it is right that this is promoted. Radial expansion would offer the most to the wider area whereas dispersal of housing whilst not supporting businesses and providing infrastructure is the worst of all worlds. Asking how retail can be promoted in the city centre is, sad to say, flying in the face of reality.
4. *Wensum Valley Alliance* - do not consider that housing numbers and job prospects will be achieved. Should concentrate on improving existing situations such as radial roads, rail links and health and welfare facilities.
5. *DHA Planning on behalf of Pelham (South Wymondham) Ltd* - Notwithstanding the lack of clarity about the baseline assessment, six growth options have been presented to determine the most appropriate distribution of the residual 3,300 homes. The growth options provide alternatives with varying degrees of concentration nearer Norwich, focus on transport corridors and dispersal around the area, including the potential for a new settlement. Option 1 seeks concentration of housing close to Norwich. We broadly oppose this as a strategy on the basis that the greatest level of need relates to the South Norfolk authority area. We therefore consider directing development to the principal settlement, although potentially sustainable, will not necessarily be meeting the objective of delivering the right homes in the right place.

Furthermore, the provision of only some 550 new homes around the existing Main Towns (including Wymondham) is disproportionate given 450 homes will be directed to service centres and 1,200 to service villages. The sustainability benefits of promoting growth around Norwich would therefore be lost as a consequence of inadequate growth in the second tier of the settlement hierarchy.

6. *Harvey and Co* – apart from a broad description, it is not clear where the 3,300 dwellings will be located. None of the houses would have ready access to the rail network which will become an increasingly important means of access for the centre of Norwich. Further pressure would be placed on the existing road network that the NDR on its own would not alleviate.
7. *Lanpro Services Ltd, on behalf of Glavenhill Strategic land* - criticise Option 1 as it is very much a repeat of the existing JCS. There have been significant issues with delivery of JCS numbers, particularly in certain areas and a repeat of this is not a desirable outcome. To accommodate the majority of required housing numbers, particularly the increased numbers advocated by Lanpro, within an option 1 scenario would require significant additional pressure being placed upon Norwich Policy Area towns and villages and the urban fringe that are already experiencing high levels of growth under the JCS.

8. *Cantley Parish Council* - strongly objects to the Urban Concentration option as it risks sprawl and loss of separation between villages and between the city and villages.

Linked to Option 1 a number of respondents also made particular comments about increasing density and making use of brownfield sites within Norwich and the urban fringe.

1. Cities in the UK generally have lower levels of population density than other European cities and Norwich is no exception. We should look for opportunities to increase housing density on brownfield sites before encroaching on rural parts of the county. Increased density does not mean poorer quality housing.
2. Full use should be made of infill potential. All sites, including brownfield sites already identified, must be utilised and expanded before any other options are considered.
3. *Natural England, Norfolk Wildlife Trust and RSPB* – all welcome the intent to focus and maximise growth on brownfield land in accordance with national policy. The GNLP should reflect the wording of paragraph 111 of the National Planning Policy Framework, which states that “Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value”.
4. *Sirius Planning* – Query the baseline assumption that the best possible use should be made of brownfield land, which is mainly within Norwich and the urban fringe. This should also apply to brownfield land within the rural areas as the NPPF encourages the effective use of land by reusing all previously developed land.

Option 2 – Transport Corridors

Although not as popular as Options 1 and 3, **Option 2 – Transport Corridors** was strongly favoured by a number of respondents. Comments made in support of option 2 were:

1. Transport corridors are key although may need improvement
2. Supports the Green Party response to ‘only allocate new housing where services can be reached on foot or by public transport’. Anything else will increase car dependency. There is no evidence that major allocations in rural areas increase social sustainability. Whatever option is chosen should be robustly tested for impact on greenhouse gas emissions, air quality and nature conservation and would need to be accompanied by significant improvement in local bus and rail services.
3. Locating housing near existing infrastructure, particularly good bus services is desirable to minimise private car use. Some of the infrastructure to support this option is already in place so would not be starting from scratch.
4. If main focus is jobs then this option makes sense in terms of allowing individuals to commute in an environmentally friendly way
5. Development must favour areas with the least environmental impact. This implies it should happen where there is strong existing sustainable transport infrastructure
6. A starting point to protect the river valleys on the outskirts of Norwich
7. Least impact on the sustainability of surrounding villages
8. Norwich should be developed on major road links such as the A11 and A47 to connect with the Norwich-Cambridge –Oxford link. Scattered rural development is inappropriate in the county when the rural towns have a lack of transport links to the main hubs e.g. Reepham
9. If a local rail network were reinstated to serve the city/county then a ‘public transit orientated’ model could be supported. This could include a combination of settlement expansion along key rail/light rail routes and new settlements.
10. *Climate Hope Action In Norfolk* - CHAIN is strongly in favour of options that are closer to services and transport infrastructure and opposes dispersal options. Concentration

around Norwich needs to be done sensitively with restrictions to preserve the city's character and historic sites. In the context of climate change, as well as other considerations, options 1 and 2 are considered acceptable options. They are also clearly acknowledged in the GNLP itself to be better re. air quality, traffic, climate considerations, encouragement of walking and cycling and development.

11. *Diss and District Neighbourhood Plan Steering Group* – Preference is for Option 2 as the proceeds of growth should encompass the main towns as well as expanding the Norwich conurbation, in order to ensure sustainability and provide enhancement to services. Option 4 is a secondary preference.
12. *DLBP Ltd* - Option 1 and Option 2 are considered the most appropriate. This is because both options provide good access to services and jobs, which are key planning considerations. If the new homes are close to Norwich, or located near transport corridors, residents will have good access to jobs, services and other facilities that are necessary for a good quality of life.
13. *East Suffolk Travellers Association* - favour option 2 as it will use existing transport corridors and should strengthen the case for improving these. As an example Brundall on the existing rail line from Lowestoft could be a catalyst for enhanced services, while growth at Loddon could take advantage of the existing bus service on the A146.
14. *Norwich Green Party* - option 1 or 2 are acceptable starting points but a few basic principles should be followed to ensure that these allocations meet the needs of Greater Norwich residents:
 - The location of new development should pay particular regard to the provision of public transport routes. If they are not served by existing routes, new public transport infrastructure must be provided for before they are occupied so that, from the outset, residents will not be reliant on private car ownership.
 - Consideration must be given to whether a form of development is possible that will allow for services – including schools, shops, health services and leisure facilities – to be accessible on foot or by bicycle, and sites should not be allocated where such access to services is not possible. Note that for some sites, this principle could be achieved by allocating a new district centre on the site itself where such services are provided. Note also that this could support the principle of denser developments than might be usual for
 - Consideration must be given, and weight given to, the need to preserve the biodiversity and ecological value of land, especially within the river valleys, but also in other locations, including applicable brownfield sites and railway lines.
15. *Railfuture East Anglia* – would prefer to see new housing provision weighted to settlements which are along rail corridors, since access to rail offers improved transport options to residents and would reduce car use and traffic congestion. There would be benefits to the local economy and growth could be delivered in a more sustainable way. Delivery of the new station proposed at Dussindale together with our own proposals for stations at Thickthorn (Norwich West) and Long Stratton could form an important part of this strategy. In particular a new station near to Long Stratton would allow the Great Eastern Main Line to play a great role in the provision of local rail services than it does at present.
16. *Suffolk County Council* - Suffolk County Council has proposed that the A140 between the A14 junction at Beacon Hill and the A47 Junction at the Harford Interchange should be added to the strategic road network. Whilst this position relates to the existing strategic function of the A140, the continued economic growth of Ipswich and Norwich

heightens the role of this route. In 2017 Suffolk County Council successfully bid for a £3.75m National Productivity Investment Fund grant from the Department for Transport to improve journey time reliability and road safety near to Eye Airfield junction along the A140, including local match funding and investment from Suffolk County Council. This investment promotes and enables development on Eye Airfield; the improved access will enable jobs and housing growth. The southern transport corridor also includes the Great Eastern Mainline, which includes Stowmarket and Diss.

17. *Barton Willmore on behalf of Landform Estates Ltd* - the merits of Drayton should be considered. It is located within the 'Norwich Fringe' northwest area as defined in the emerging Local Plan. Furthermore, the Northern Distributor Road (NDR) has been constructed and will be fully open in spring. Due to its location, Drayton has been the focus of historical development and is considered a highly sustainable location that can accommodate future growth. 235 dwellings have been built in the settlement since 2006 (of the 37,500 allocated across the Joint Core Strategy to 2026).

Looking at the wider picture, the majority of the new Local Plan's housing requirement is committed, but the total requirement for new allocations (subject to appropriate testing) is at least 7,200. In order to ensure brownfield's sites are maximised and rural needs addressed, all options include a 'baseline position' which provides for 3,900 homes. Consequently, there are sites for a further 3,300 dwellings to be found under six differing strategic growth options. Option 2 would focus dwellings in main transport corridors and include up to 200 new dwellings in the Northern Fringe northwest. The Norwich Fringe is well served by the NDR. Whilst there is a degree of overlap with Option 1, we feel there should be a greater focus on the NDR and its relationship with the Norwich fringe.

18. *Carter Jonas on behalf of clients* - the proposed growth strategy needs to be based on the principles of sustainable development, as set out in the NPPF. The findings of the Sustainability Appraisal should inform the option which is selected. The growth strategy should seek to direct development to locations which contain a good range of services and facilities and employment opportunities and are accessible by walking, cycling and public transport, or where these matters can be improved in conjunction with development. The preferred growth locations should have no significant constraints or where mitigation measures can address those significant impacts.

We consider that a growth strategy based on the dispersal of development away from Norwich and the larger settlements would not meet the principles from sustainable development, in that it would increase the levels of in-commuting into Norwich for employment opportunities and much less likely that sustainable transport options would be available for journeys to work and for other purposes. The cost of providing or upgrading transport infrastructure to address the shortcomings of a dispersal strategy would need to be funded by development and from public sources; it would be inappropriate for City Deal funding to be used to address an unsustainable development strategy.

We support the growth options which direct additional development to the Growth Triangle/edge of Norwich and to Wymondham because these areas are sustainable locations for development and are the most accessible; this approach is reflected in Options 1 and 2 and we support both these options. However, our preferred growth strategy would be based on the outcomes for Option 2. We do not support the new settlement option.

19. *Cornerstone Planning Ltd on behalf of Barnham Broom Golf and Country Club* - Option 2 and Option 6 appear to offer the most likely opportunities to accommodate the type of development being promoted by Barnham Broom Golf and Country Club, although none would make direct provision for such an innovative approach to providing housing to meet specific group/s and related needs.

Whichever of the options is pursued, sufficient flexibility is necessary to facilitate the type/s of development being promoted. We acknowledge that what we propose does not fit into the usual structured and conventional housing provision strategies.

However, it does seek to address a specific and identified need. Adding an under-met and growing need for accommodation suited to the particular demands of the 55+ ageing demographic, as well as for those seeking affordable/first-time homes, and for in-bound tourism, is not straightforward. However, for those seeking to settle within and move to the Norfolk/Norwich area, as it continues to become an increasingly popular destination and desirable place to live, we believe the existing infrastructure makes such provision at Barnham Broom desirable, viable and sustainable.

20. *Cornerstone Planning Ltd on behalf of Norfolk Homes Ltd and Norfolk Land Ltd* - Option 2, Option 4 and Option 6 appear to offer the most likely opportunities to accommodate the type of development being promoted by Norfolk Homes Ltd and Norfolk Land Ltd in Aylsham. In particular Option 2, which at least acknowledges the need for a more sensible and sustainable strategy in focusing a more than token level of development in the main towns. As the supporting text acknowledges, this is an option that has enhanced sustainability as a "... result of the better geographical relationship of development under these options to services, facilities, employment opportunities and sustainable transport options."
21. *DHA planning on behalf of Pelham (South Wymondham) Ltd* - Notwithstanding the lack of clarity about the baseline assessment, six growth options have been presented to determine the most appropriate distribution of the residual 3,300 homes. The growth options provide alternatives with varying degrees of concentration nearer Norwich, focus on transport corridors and dispersal around the area, including the potential for a new settlement.

Option 2 promotes growth around key transport corridors. Of the options included, this is among Pelham's preferred approaches. In the first instance it builds upon the strategic road network of which the A11 and A140 run through the South Norfolk district area. Such growth would ensure that the right housing is located within the right location.

Nevertheless, this strategy should also be focused around the public transport corridors and should have regard to accessibility to mainline railway stations in order to encourage reduced reliance on car use. In this regard, a large portion of the 1,650 new homes needed under this option should be directed towards Wymondham on the basis of the cumulative sustainability credentials, namely the services, the excellent public transport links and the wider access to the strategic road network that it offers.

22. *Colney Parish Meeting* - favours growth option 2.
23. *Dickleburgh and Rushall Parish Council* – favour options 1 and 2 because although the community of Dickleburgh are committed to playing a part in the GNLP's future plan for housing it is essential that growth is sustainable, proportionate and sited so that it does not place an intolerable strain on the infrastructure and character of Dickleburgh. For environmental reasons, to avoid urban sprawl and to retain the essential character of our rural communities and landscape, the main concentration of new development

should be where people work. Too much dispersal into villages will cause urban sprawl and compromise the rural character of our villages and countryside.

24. *Little Melton Parish Council* - the biggest problem that results from development is traffic growth. Development should be focused on areas where innovative transport solutions can be provided to meet the needs of both new and existing residents e.g. trams, light rail, buses etc.
25. *Scole Parish Council* – this is the logical choice to ensure that existing communities with reasonable infrastructure continue to develop. The Waveney Valley should be considered as a special case due to its location on the border with Suffolk, which will require cross-county coordination.
26. *Framingham Earl Parish Council* - Options 1 and 2 concentrate development close to Norwich where there is reasonably good infrastructure public transport. However in the Framingham Earl and Poringland area there has already over the years been a huge amount of development, twice as much as the whole of Norfolk for the period 2010/2017, 10% in Framingham /Poringland and only 5% for the whole of Norfolk. Already our primary and secondary schools are nearing capacity, before any of the sites currently being developed are finished and families move in. The road network is overloaded, and now the local lanes are seeing an enormous increase in traffic use. Further large scale developments in our area would totally overload the services and roads.
27. *Reepham Town Council* - To quote from the Foreword to the GNLP document, “sustainable access from homes to services and jobs will remain the key consideration for good planning”. Options 1, 2 and 3 are already best served with infrastructure, and are suitable for larger scale developments which the larger firms are able to provide. The railway to Cambridge, running alongside the A11/A14, forms a potentially invaluable communication link. Options 1, 2 and 3 are the Town Council’s favoured options. The statement that Options 4 and 5 “are more likely to address the draft plan delivery to deliver homes. This is because they provide for a much wider dispersal of development, and in doing so increase diversity, choice and competition in the market for land, which would be beneficial for delivery.” is disputed. These options are more likely to be served by windfall developments undertaken by smaller developers and builders; not only are these more likely to be built, because they are smaller scale and tend to have more local support but they are more likely to be sustainable than large scale developments. Options 4 and 5 are not favoured. Similarly, Option 6 is not favoured.

Although there was strong support for option 2 there were also some comments made against this option:

1. A road based ‘transport corridors’ growth model is unsustainable and environmentally damaging and will lead to further congestion of Norwich city centre, undermining quality of life, quality of place and productivity.
2. This option is centred upon the A roads when A47 A11 and A140 are already at their limits at travel to/from work times. We would not expect to have A146 or B1332 as transport corridors – suspicious about fall-out from such a proposal where we might find B1332 as even more of a transport artery.
3. *Harvey and Co* – support the recognition of the importance of transport corridors, but believe the focus for such corridors should also be determined by accessibility to the rail network, not roads alone. The A47 (west), A140 (north) and the A1151 should not be identified within transport corridors. The nearest station to Norwich on the Cromer

Line is Salhouse and on the Great Yarmouth line it is Brundall Gardens. Occupants of houses in the fringe sectors are not going to drive to either. The distribution of development under this option is therefore entirely inappropriate and will simply generate further unsustainable car usage on roads that will not have adequate capacity without improvements to the road network of such a scale that they would be completely unaffordable. If transport corridors are to function effectively and development is to be sustainable, new development should be centred primarily on locations with easy access to the railway stations.

4. *Cantley Parish Council and Blofield Parish Council* – both strongly object to the Transport Corridor option as it will simply encourage over development of villages along the main roads.
5. *Wymondham Town Council* - The Town Council has undertaken an initial assessment of the emerging (Regulation 18) Greater Norwich Local Plan documentation and offers responses to the 6 options outlined. Option 2 Transport Corridors - this proposes 1,100 homes predominantly allocated to Wymondham and possibly some to Diss on top of the baseline. No additional to Spooner Row above the baseline for Others. It was considered that was too many to allocate to the A11 corridor and could impact on the settlement gap between Wymondham and Hethersett and would put too much strain on existing infrastructure such as Education and Health.

Option 3 - Cambridge- Norwich Tech Corridor

Option 3 - Supporting the Cambridge to Norwich Tech Corridor was the second most popular option after Option 1. Comments made in support of Option 3 were:

1. Important to improve links with Cambridge and support/encourage Tech industry growth and high calibre jobs. There should be more partnerships between the cities. The Tech corridor gives Norwich an opportunity to participate as a recognised expert in high growth business.
2. With people migrating to the area the A11 corridor is the ideal solution for transport links to and from London. Duelling of the A11 (and completion of the NDR) means that the Cambridge- Norwich Tech corridor is the ideal area for expansion with the least traffic congestion and provides areas for new settlements. The addition of a new Garden Village in the area would provide a new community with all services provided.
3. The concept of a new settlement in the Tech corridor is attractive. It could provide a focus for subsequent development beyond the suggested 2,000 dwellings, reducing demands on the main towns and key service centres, some of which are already finding their services and facilities under strain from recent expansions.
4. It will enhance growth of jobs and should mitigate environmental factors. In a large rural community housing should be concentrated where there is already established infrastructure. Some of the infrastructure to support this option is already in place so would not be starting from scratch.
5. Growth needs to be centred on employment opportunities and public transport links to reduce commuting in private cars. This area has good connectivity to the A11 and also links to the UEA, hospital and NRP. The Cambridge-Norwich Tech corridor appears to offer increased future employment opportunities so adequate housing should be provided nearby.
6. Sustainable option giving the opportunity to develop the currently underused Norwich-Cambridge railway. This option should include a proposal to upgrade the service on the Norwich- Cambridge line. Allows for intensification of development at settlements

along the line. Homes could be built with access to railway stations, either by bus or bike

7. Roads need to be a priority as well as car parking.
8. Easy access to city centre and park and ride facility on A11
9. Option 3 is not ideal but provides the most sensible option of not smothering service villages and other villages with building, would share homes around the best placed existing main towns with the required facilities
10. *Breckland Council* – May impact on Breckland and wider consideration needs to be given to Breckland’s emerging Local Plan and the cumulative impacts of development upon infrastructure particularly associated implications of A47 dualling and planned growth at Attleborough and Thetford. Breckland Council would like to work closely with the GNDP to understand the implications for Breckland prior to any sites being identified.
11. *Suffolk County Council* - The delivery of growth along the Norwich-Cambridge corridor, which then has onward links from Cambridge, would emphasise this direction of growth and be associated with growth/infrastructure ambitions in West Suffolk. This direction already includes Attleborough and Thetford; the consideration of further additions is an opportunity to consider how further growth influences delivery and the phasing of infrastructure. In considering further growth, the A11 Fiveways roundabout (at Mildenhall) needs to be included when assessing transport impacts and appropriate mitigation.
12. *Barton Willmore on behalf of the Trustees of JM Greetham No.2 settlement* - support option 3 with amendments as the favoured option based on the role that Spooner Row can play both in its location to the A11 and Norwich, as well as the suitability and deliverability of the five sites which are being promoted. Support for the acknowledgement in the Growth Options document that the chosen strategy may be an amalgamation of options with no preferred options identified at this time.
13. *DHA planning on behalf of Pelham (South Wymondham) Ltd* - Notwithstanding the lack of clarity about the baseline assessment, six growth options have been presented to determine the most appropriate distribution of the residual 3,300 homes. The growth options provide alternatives with varying degrees of concentration nearer Norwich, focus on transport corridors and dispersal around the area, including the potential for a new settlement. Option 3 supports the delivery of housing within the Cambridge to Norwich Technology corridor. As with option 2, we support this as a potential strategy given it would see housing growth delivered in the area for which there is the greatest level of need. However, the provision of 1,250 new homes should again be focused around the growth of Wymondham being the main settlement in this strategic zone.
14. *Harvey and Co* – applaud the recognition of the importance of the Norwich/Cambridge Tech corridor. There is huge potential for Norwich to further benefit from its proximity to Cambridge, particularly in light of Norwich Research Park’s growing impact on the regional economy. The fully dualled A11 and the opening of the new station at Cambridge north improves the connectivity between the two centres. The principles for distribution of development should accord with those we have set out under option 2, in that ready access to the rail network is essential, particularly to ensure full benefit is achieved from combining of the two centres of scientific excellence. This means locating 500 dwellings to the west would not be appropriate. However, in principle, the location of the remaining houses looks sensible. The exception to this comment

- however is the proposal to locate only 500 units in a new settlement. This would not create sufficient critical mass to deliver all the benefits of such a settlement.
15. *Lanpro Services Ltd, on behalf of Glavenhill Strategic land, Silfield Limited and a number of other clients* - support option 3 with some variations. These variations relate to the overall level of housing proposed which it is considered should be within the region of 11,000 – 14,000 new homes. In order to accommodate the additional numbers option 3 should be amended to c. 2000 units to a new settlement within the plan period (more to follow post 2036, allocation of additional brownfield sites within Norwich City if available, allocation of additional c. 1000 units to the north east on smaller sites to provide short term delivery to supplement larger growth triangle site. Any remaining requirement to be split proportionally between other locations identified under option 3. Option 3 is supported as a sustainable choice because it will ensure that proposed housing growth is closely aligned with the New Anglia LEP Economic Plan and will provide the best support to enable the jobs potential of the Hi-Tech corridor to be realised. It has the advantage of providing homes close to where jobs will be created and enabling a planned approach towards infrastructure provision linking into various funding streams. It provides the opportunity to focus significant growth in an area which could effectively create an extension of the Cambridge-Milton Keynes-Oxford corridor and attract significant investment. Promotion of a new settlement to garden village principles within this option, although ambitious, would offer opportunities. Further evidence is submitted in support of a new settlement based at Hethel
 16. *Lanpro Services Ltd on behalf of MAHB Capital* - We broadly support Option 3 'Supporting the Cambridge to Norwich Hi-Tech Corridor'. However, we recognise the merits of siting employment land in transport corridors close to principle sustainable settlements and as such the principle of Option 2 'Transport Corridors' in respect of the siting of employment land, is recognised. Broadly, Option 3 is supported because it would ensure that the proposed housing growth is closely aligned with the ambitions of the New Anglia LEP Strategic Economic Plan which aims to deliver economic growth in identified Growth locations including Greater Norwich to build on the City Deal. Option 3 will provide the best support to enable the jobs potential of the Hi-Tech corridor to be realised in addition to jobs growth associated with the city centre, NRP and airport. Option 3 provides the opportunity to focus significant growth in an area which could effectively create an extension of the Cambridge, Milton Keynes, Oxford corridor, which will be the subject of significant investment. In order to compete effectively with and benefit from Cambridge regional growth, this option is essential.
 17. *Blofield and Cantley Parish Councils* - both fully support the Cambridge-Norwich Tech Corridor option. This option appears to put housing development where commercial development and employment growth is foreseen and would follow good communication links.
 18. *Marlingford and Colton Parish Council* - favour option 3 as this allocates most development within the Norwich area and along the Norwich – Cambridge corridor. This would enhance the economic development of the county and provide sustainable communities with transport links and access to work.
 19. *Rackheath Parish Council* - support Growth Option 3, the Cambridge to Norwich Tech Corridor due to accessibility and transport links.
 20. *Reepham Town Council* - To quote from the Foreword to the GNLP document, "sustainable access from homes to services and jobs will remain the key consideration for good planning". Options 1, 2 and 3 are already best served with infrastructure, and are suitable for larger scale developments which the larger firms are able to provide.

The railway to Cambridge, running alongside the A11/A14, forms a potentially invaluable communication link. Options 1, 2 and 3 are the Town Council's favoured options. The statement that Options 4 and 5 "are more likely to address the draft plan delivery to deliver homes. This is because they provide for a much wider dispersal of development, and in doing so increase diversity, choice and competition in the market for land, which would be beneficial for delivery." is disputed. These options are more likely to be served by windfall developments undertaken by smaller developers and builders; not only are these more likely to be built, because they are smaller scale and tend to have more local support but they are more likely to be sustainable than large scale developments. Options 4 and 5 are not favoured. Similarly, Option 6 is not favoured.

21. *Upton with Fishley Parish Council* – Good transport links to employment. Traffic arising from these developments would not have to travel through or round Norwich to leave the county for work or leisure
22. *Wroxham Parish Council* – the area cannot rely on old industry for the creation of new jobs. Developments should be focused in the higher tech industries in the Cambridge to Norwich Tech corridor.
23. *Tivetshall Parish Council* supported this option in conjunction with option 6 but noted that the villages in the parish should have had Outdoor Recreation and Journey to Work by Public Transport included within the secondary services they offer.

Although there was strong support for option 3 there were also some comments made against this option:

1. *Climate Hope Action In Norfolk* - some concern re. Option 3 and its inclusion of a new settlement. Option 3 could be seen as positive if it were only 1 - to be considered after full exploitation of brownfield and city sites and 2 - to be developed as a low carbon community with strong low carbon public transport links, Passivhaus design, built in water management (such as rainwater recapture), recycling facilities, electric car charging points and integral community energy provision (wind and solar).
2. *Barton Willmore on behalf of Landform Estates Ltd* - the merits of Drayton should be considered. It is located within the 'Norwich Fringe' northwest area as defined in the emerging Local Plan. Furthermore, the Northern Distributor Road (NDR) has been constructed and will be fully open in spring. Due to its location, Drayton has been the focus of historical development and is considered a highly sustainable location that can accommodate future growth. 235 dwellings have been built in the settlement since 2006 (of the 37,500 allocated across the Joint Core Strategy to 2026).

Looking at the wider picture, the majority of the new Local Plan's housing requirement is committed, but the total requirement for new allocations (subject to appropriate testing) is at least 7,200. In order to ensure brownfield's sites are maximised and rural needs addressed, all options include a 'baseline position' which provides for 3,900 homes. Consequently, there are sites for a further 3,300 dwellings to be found under six differing strategic growth options. Option 3 would support the Cambridge to Norwich Tech Corridor. This option would see no development in the Norwich Fringe northwest. Landform object to this proposal. Given the function of Norwich and its existing infrastructure, it is nonsensical to allocate the majority of new development outside of the city.

3. *Wymondham Town Council* - The Town Council has undertaken an initial assessment of the emerging (Regulation 18) Greater Norwich Local Plan documentation and offers responses to the 6 options outlined. Option 3 Supporting the Cambridge Norwich Tech

Corridor - This proposes 700 predominantly allocated to Wymondham on top of the baseline, leaves the Other at 1200 but proposes a new settlement of 500 in or near the A11 corridor. This was considered to be overdevelopment and would place too much strain on a heavily congested transport route (A11) and potentially on the infrastructure of Wymondham in areas such as Education and Health.

Option 4 – Dispersal

Option 4 – Dispersal was not as well supported as the first three options. Comments made in support of option 4 were:

1. Dispersal is a better model as it spreads the load across an area rather than making hotspots. Less large scale developments should be key to improve the quality of housing stock and allowing people to have a place in community
2. It is a realistic option, which allows for the unpredictable and is flexible. Does not commit to massive projects that can fall apart when circumstances change
3. Overall dispersal seems to be the fairest way of avoiding NIMBY attitudes and the impact of large new settlements
4. More likely to address the draft plan objective to deliver homes because dispersal of development will increase diversity, choice and competition in the market. It will also increase social sustainability by providing opportunities for people to continue to live in villages. Village communities need to be kept alive with schools and shops by building houses young people can afford to buy
5. The vitality of the rural economy can only be supported by allowing smaller settlements to expand to enable smaller businesses to survive and thereby minimising the need for people to travel to obtain goods and services
6. Large developments require massive infrastructure investment whereas expanding villages in tied groups allows investment to be coordinated and aligned to building targets.
7. Look to the rail network to help reduce traffic. Build new developments in villages or towns with rail access or open new rail stations to service new developments.
8. Impacts for Neighbourhood Plans and the availability of dark skies in the Broadland area
9. *John Long Planning on behalf of Otley Properties* - dispersal could be an appropriate strategy provided that it is focused on the rural market towns, key service centres and appropriate sized service villages in the rural area rather than the lower tier settlements. A combination of options could also be appropriate but Otley Properties reserve judgement on a favoured growth option until there is clarity on the OAN and overall housing numbers to be delivered.
10. *Pegasus Planning Group on behalf of Trustees of Arminghall Settlement* - favour option 4 as it allows for clients site at Octagon Farm (GNLP0321 and 1032) to come forward. Appendix 1 of the document does not appear to demonstrate that the zone of dispersal would cover the area of these sites and the supporting text neglects to mention Framingham Earl. Both aspects should be amended accordingly. Potential yield from sites to be allocated at Key Service Centres should be increased to ensure that the needs of the rural community can be met and such communities can be sustained. Such a strategy would complement a strategy that allows for significant growth in and around Norwich.
11. *Woods Hardwick Planning Ltd* – Option 4 is more likely to address the draft plan objective to deliver homes. Because it provides a much wider dispersal of development it increases diversity, choice and competition in the market for land, which should be beneficial for delivery. It allows additional growth in towns and villages which would

support existing local services and community facilities in accordance with the NPPF. The allocation of a range of sites is essential. Too much reliance can be placed on large strategic sites which take time to deliver. The allocation of small to medium sites can maintain consistent delivery. Such sites are easy to bring forward such as clients site in Newton Flotman (ref GNLP0594).

12. *Diss and District Neighbourhood Plan Steering group* – Preference for Option 2 with Option 4 as a secondary preference. The dispersal of growth to smaller settlements will in turn aid their sustainability and allow them to support their nearest main town. This becomes particularly relevant in places such as the Waveney Valley where the main towns and key service centre support settlements across the river. Requires consultation with the Joint Babergh Mid Suffolk Local Plan and may require a slightly difference approach for areas neighbouring each other across LPA boundaries.
13. *Bracon Ash and Hethel Parish Council* – The Parish Council understands the need for development but considers that smaller less obtrusive small scale developments scattered throughout the GNLP area would be a better solution than some of the large green field developments put forward. There is an unbalance with the amount of development within the Norwich City Council area. It is believed that there are several brownfield sites available in Norwich which should be developed. South Norfolk has already experienced a lot of development in the previous JCS yet again there is a significant amount proposed in the district. It is considered imperative that growth takes place in the city centre to reduce the use of cars and encourage cycling.
14. *Brundall Parish Council* – Option 4 is our first preference, then option 3 and 2.
15. *Ditchingham Parish Council* – Councillors recommend dispersal for the 7,200 new homes
16. *Hellesdon Parish Council* – support to prevent urban areas spreading further into the countryside.
17. *Pulham Market Parish Council* – at the time of writing we envisage Pulham Market could benefit from an additional 10-15 dwellings within the designated time frame. This number will be continuously under review.

There were a number of comments made against the dispersal options in general:

1. Dispersal is the worst option as it increases inefficiency. Concentrate development where we already have large established communities as urban communities are more efficient e.g. it is easier to maintain an urban to urban bus services than it is to cater for rural communities. Cities and large towns are the future
2. This is not a sustainable growth model, nor does it optimise place competitiveness nor economic opportunity
3. Maintaining a viable size of community to enable adequate infrastructure to be provided is very important. Dispersal of housing in any of its manifestations does not achieve this and is likely to lead to infrastructure stresses. We should optimise development in areas with existing physical, social and commercial infrastructure.
4. Building houses without access to jobs and with inadequate or absent infrastructure is going to create its own set of problems, not least adding traffic to country roads with increased CO2 emissions as residents commute to work, school, shops, healthcare and leisure. The options that favour dispersal are the options with the lowest mitigation in these areas, with fewer job opportunities, absent or inadequate infrastructure and higher requirement for road travel.
5. A priority should be to minimise the need to travel. Dispersal would inevitably increase travel, particularly dependence on private cars. In the era of climate change this would

be a retrograde step. The Local Plan should seek to create self-contained communities to reduce the need to travel rather than the dispersal option which would scatter houses across small villages and increase reliance on the car.

6. Development should only take place where services can be accessed on foot or by public transport. Anything else will increase car dependency contrary to the aims of national planning policy. There is no evidence that major allocations in rural areas increase social sustainability. The three dispersal options are contrary to the principles of good planning and are not an acceptable way to plan for growth.
7. This is taken to mean that dispersal would be to Key Service Centre, letting the Growth Triangle of the city area off the hook. This form of dispersal would mean a significantly increased load on infrastructure in the Key Service Centres
8. *Climate Hope Action In Norfolk* - We strongly oppose all dispersal options i.e. options 4,5 and 6 as these would mandate further dependency on private car use, which is already high in the county.
9. *CPRE Norfolk* - the options involving dispersal would lead to even more land banking of existing sites and encourage cherry picking of the more desirable and profitable rural greenfield sites. Option 4 would lead to a minimum of 3,100 houses being allocated to Service Villages (about 60 settlements) resulting in each of these villages having to accommodate a substantial estate of around 50 houses. Such large scale estate development spread widely throughout the GNLP area would create additional traffic problems, overcrowding of roads, long commutes and higher levels of air pollution.
10. *Norwich Green Party* - We strongly oppose options 4, 5 and 6. We are concerned that these three options involve placing a significant amount of development in small villages and rural locations where the only practical transport option is the private car. Such increases in private car use would have implications not just for climate change and local air quality, but also on the quality of life of all Norwich residents, as increased traffic would increase journey times, pressure on parking, and air quality. Since a full complement of services are unlikely to be within walking distance, these options would also compromise the ambition to encourage active travel.
11. *Barton Willmore on behalf of Landform Estates Ltd* - the merits of Drayton should be considered. It is located within the 'Norwich Fringe' northwest area as defined in the emerging Local Plan. Furthermore, the Northern Distributor Road (NDR) has been constructed and will be fully open in spring. Due to its location, Drayton has been the focus of historical development and is considered a highly sustainable location that can accommodate future growth. 235 dwellings have been built in the settlement since 2006 (of the 37,500 allocated across the Joint Core Strategy to 2026).

Looking at the wider picture, the majority of the new Local Plan's housing requirement is committed, but the total requirement for new allocations (subject to appropriate testing) is at least 7,200. In order to ensure brownfield's sites are maximised and rural needs addressed, all options include a 'baseline position' which provides for 3,900 homes. Consequently, there are sites for a further 3,300 dwellings to be found under six differing strategic growth options. Option 4 would disperse development to the villages. This option would include up to 200 new dwellings in the Northern Fringe northwest. Whilst we do not object to an element of dispersal, we feel there should be a greater focus on the NDR and its relationship with the Norwich fringe.

12. *DHA Planning on behalf of Pelham (South Wymondham) Ltd* - Notwithstanding the lack of clarity about the baseline assessment, we understand that six growth options have been presented to determine the most appropriate distribution of the residual 3,300

homes. The growth options provide alternatives with varying degrees of concentration nearer Norwich, focus on transport corridors and dispersal around the area, including the potential for a new settlement.

Option 4 promotes disbursed growth throughout the GNLP area. However, based on this approach we would be concerned that there would be a substantial level of growth directed towards settlements that would not necessarily deliver sustainable development. Furthermore, growth of all settlements is likely to be watered down to such an extent that it will not be of sufficient enough scale to deliver reasonable level of infrastructure.

13. *Harvey and Co* - Dispersal is the worst of all worlds. It would not deliver coherent, joined up development with any specific objective in mind. Comments in respect of fragmenting the increased demand for public services and the likely issues in terms of viability of delivering enhanced services on a piecemeal basis apply to this option.
14. *Lanpro Services Ltd on behalf of Glavenhill Strategic Land* - the provision of adequate infrastructure and services to support new housing is extremely difficult under dispersal options and the increased level of public opposition to numerous dispersed sites that may not be properly served by infrastructure and services should not be underestimated. This is not to say that there should be no dispersal, however. Where smaller sites in towns and villages can bring community benefit or help the viability of existing services and facilities this should be supported. It is considered that option 3 provides the right level of dispersal without making this the focus of the growth strategy.
15. *Salhouse Parish Council* - The dispersal options 4, 5 and 6 will require more extensive infrastructure developments which will be expensive and we are not confident will be delivered.
16. *Wymondham Town Council* - The Town Council has undertaken an initial assessment of the emerging (Regulation 18) Greater Norwich Local Plan documentation and offers responses to the 6 options outlined. Option 4 Dispersal - This proposes that a large majority of the proposed 650 homes would be distributed to Wymondham on top of the baseline. It proposes that an additional 1900 are dispersed onto the existing 1200 for Others and would have an impact on Spooner Row. Concern was again raised that the 650 together with any allocation from within the baseline figure would cause potential issues in terms of infrastructure.

Option 5 – Dispersal plus New Settlement

Option 5 Dispersal plus new settlement was the least popular of the six options with the provision of a new settlement appearing to divide opinion. Comments made in support of Option 5 were:

1. Support for Garden City principles being adopted, hopefully with a significant proportion of local authority housing as they were the bedrock of new town and garden city development.
2. It is probably better to build a new town rather than join up the urban sprawl around Norwich, thus keeping each town's individual identity
3. The best bet is a new settlement where all the infrastructure can be provided and transport links created. If there are a few houses here and there then the existing infrastructure has to take the strain. Most roads especially the A140 are overload and more traffic will lead to delays, pollution and costs. Invest now in a place with good transport links.

4. A new settlement with necessary infrastructure would be a good choice as it would be large enough to create jobs within it rather than simply providing homes with no new local employment opportunities.
5. Dispersal may avoid the problem of over inflating land value and land grabbing and be more beneficial for the local economy. However dispersal alone will not necessarily solve the problem and a new settlement would ultimately be needed to create a new urban centre.
6. Too much development has been concentrated on Norwich, which will start to fundamentally change the nature of the city. Norwich has grown too much, too quickly. Having a new settlement would help to alleviate pressure on services which are already stretched and struggling and could be designed to be self-contained.
7. Even in smaller villages there is a need for limited new housing, particularly cheaper properties for younger people. Otherwise villages become the sole domain of older middle class and retired people.
8. Small villages can struggle to maintain adequate services such as shops, post offices and schools and additional housing can ensure survival of these. However, a new settlement would mean that dispersal would not have to be in such large numbers that is adversely affects/swamps existing settlements.
9. Option 5 – dispersal plus new settlement looks attractive but it still lets the Growth Triangle off the hook, making a small difference as a result of the Garden Village, therefore not very attractive.
10. *Norwich Society* – the benefits of one or more new settlements must be properly examined, especially in light of the government’s intention to introduce regulation that will allow the establishment of locally accountable New Town Development Corporations. We believe that these could provide a way to meet a major part of the growth pressures in the most sustainable way with the ability to build quality homes quickly and possibly at lower prices. We understand the geographical limitations of the GNDP but would encourage conversations with neighbouring authorities to see if a major new settlement (10,000 + homes) somewhere along the Norwich to Cambridge road/rail transport corridor might provide a good way of meeting the demand for new homes for people working in these two high tech centres.
11. *Brown and Co.* - In terms of delivering growth, the Regulation 18 consultation proposes six options, of which we would support Option 2 and Option 5. We believe that a new settlement is the only way to achieve a step change in the delivery of growth in the Greater Norwich area. Whilst previous significant allocations in the current Joint Core Strategy have failed to deliver any housing whatsoever, we believe that Honingham Thorpe has the necessary attributes to deliver balanced growth. The site is being driven by one landowner and has a promoter with an ability to deliver housing in a range of tenures. In addition, the proposed sustainable settlement would be brought forward in a balanced manner with employment and a country park combined with a drive to deliver housing in a suitable environment. The proposal is not dependent upon significant infrastructure being constructed prior to development commencing on the settlement.
12. *Burston and Shimpling Parish Council* – Favour those options that enable people to get to where they need to be quickly and with minimum pollution. Dispersal does not seem appropriate unless jobs and all facilities are also dispersed. Just dispersing homes will put strains on services local to the homes, but without much chance of those services being expanded. By services is meant everything including road, power supply,

sewerage, doctors, schools, shops. New settlements would seem ideal, as then the appropriate 'services' can be supplied efficiently and fairly

13. *Costessey Town Council* – this would be the best option for ensuring the viability of small settlements and bring newer residents in at a controlled rate.
14. *Starston Parish Council* - Creating a new settlement should provide the opportunity for good design i.e. one that supports a sense of community; reduces the impact of traffic; creates footpaths and cycle paths; supports economic development etc.

There were also a number of comments made against the dispersal plus new settlement option:

1. There is no justification for any New Settlement. The emphasis should be on development on brownfield sites as long as the value of biodiversity in such sites is taken account of.
2. *Home Builders Federation* -The proposal for two new villages of some 2,500 to 4,500 houses begs the question whether the planners are sufficiently capable or authoritative enough to guide the developers to create self-sustaining communities with a fair mix of different housing types and access to amenities, facilities and utilities. The proximity of the Stanfield site to Wymondham, has the potential to create a much larger conurbation by default, as in-fill will be too attractive in later years. This is much less attractive prospect.
3. *Norwich Green Party* - We oppose options 3 and 5 on the basis of them including a new settlement. Whilst we do not object to the principle of developing a new settlement in the long term, we feel that this is not an appropriate time to consider the development of a new settlement whilst so much of the North-East Growth Triangle (which amounts to a new settlement in many practical terms) remains unbuilt. We do not consider either of the proposed sites mooted as appropriate locations for new settlements.
4. *Barton Willmore on behalf of Landform Estates Ltd* - the merits of Drayton should be considered. It is located within the 'Norwich Fringe' northwest area as defined in the emerging Local Plan. Furthermore, the Northern Distributor Road (NDR) has been constructed and will be fully open in spring. Due to its location, Drayton has been the focus of historical development and is considered a highly sustainable location that can accommodate future growth. 235 dwellings have been built in the settlement since 2006 (of the 37,500 allocated across the Joint Core Strategy to 2026).

Looking at the wider picture, the majority of the new Local Plan's housing requirement is committed, but the total requirement for new allocations (subject to appropriate testing) is at least 7,200. In order to ensure brownfield's sites are maximised and rural needs addressed, all options include a 'baseline position' which provides for 3,900 homes. Consequently, there are sites for a further 3,300 dwellings to be found under six differing strategic growth options. Option 5 would disperse development and include a New Settlement. This option would include up to 200 new dwellings in the Northern Fringe northwest. From experience, new settlements are rarely delivered in the timescales outlined, if at all. In the event the three councils cannot demonstrate a healthy supply of housing, they would be at risk of departure applications from unallocated sites. Consequently, Landform object to this option.

5. *DHA planning on behalf of Pelham (South Wymondham) Ltd* - Notwithstanding the lack of clarity about the baseline assessment, six growth options have been presented to determine the most appropriate distribution of the residual 3,300 homes. The growth options provide alternatives with varying degrees of concentration nearer Norwich,

focus on transport corridors and dispersal around the area, including the potential for a new settlement.

Option 5 considers the merit of a new settlement and dispersed growth. However, our client has concerns regarding the option of a new settlement and whether this will be deliverable within the plan period. If this is a strategy that is to become a realistic prospect for the future, it would be better served being identified as a broad location for growth coming forward after 2036. Furthermore, we question the logic of a new settlement when our client controls sufficient land to immediately begin homes within the current plan period. In short, a new settlement should be viewed as a last resort and is not yet needed. Should a new settlement be pursued, it should be located in such a location that it does not prohibit an existing settlements scope to evolve.

6. *Thorpe St Andrew Town Council* - We support options 1, 2 and 3. We do not support Option 5, as the new settlement will take away development which is required to make some villages sustainable.
7. *Wymondham Town Council* - The Town Council has undertaken an initial assessment of the emerging (Regulation 18) Greater Norwich Local Plan documentation and offers responses to the 6 options outlined. Option 5 Dispersal plus new Settlement - This is identical to option 4 other than to reduce the proposed allocation to Others by 500 to 1400 replacing this with a proposal for a new settlement of 500 in a transport corridor of which the A11 is one. The A11 and A140 corridors were considered to be unsuitable due to heavy transport congestion and due to its size the new settlement would have to be linked to a larger settlement for a full range of services.

Option 6 – Dispersal plus urban growth

Option 6 Dispersal plus urban growth was only slightly more favoured than the least favoured option 5 of dispersal plus new settlement. Comments in support of Option 6 were:

1. Provides a reasonable and fair distribution of new growth without unduly impacting on any single area. All areas would benefit from new development whilst the 'burden' associated with new developments would be more evenly spread.
2. Urban growth supports sustainable transport for the majority, while dispersal allows flexibility for homes for those working outside urban areas.
3. Puts the least pressure on the highest number of communities. Settlements should grow organically and attractively in a way that brings the community with them. Norwich has a healthy critical mass of consumers whereas all settlements would benefit from a few new homes to keep the schools, shop, pubs etc. going.
4. This is one of the favoured solutions because it will put the housing growth in proximity to the growth in jobs and reduce the impacts of travel to work and making it a sustainable option particularly as infrastructure is readily accessible.
5. For Reepham this option allows for a small amount of additional growth beyond 2026 to 2036, as the existing 2 allocations for 140 homes will not necessarily be delivered in a timely manner and will impact on the 5 years supply required by Gov't policy. Some 75 or so new housing allocations would enable Reepham to grow beyond 2026.
6. Specific support given to Option 6, within the context of Poringland. This option supports a more balanced approach to the growth across the Greater Norwich Area with a focus on both urban growth and dispersal in the rural area.
7. *Barton Willmore on behalf of Landform Estates Ltd* - the merits of Drayton should be considered. It is located within the 'Norwich Fringe' northwest area as defined in the emerging Local Plan. Furthermore, the Northern Distributor Road (NDR) has been constructed and will be fully open in spring. Due to its location, Drayton has been the

focus of historical development and is considered a highly sustainable location that can accommodate future growth. 235 dwellings have been built in the settlement since 2006 (of the 37,500 allocated across the Joint Core Strategy to 2026).

Looking at the wider picture, the majority of the new Local Plan's housing requirement is committed, but the total requirement for new allocations (subject to appropriate testing) is at least 7,200. In order to ensure brownfield's sites are maximised and rural needs addressed, all options include a 'baseline position' which provides for 3,900 homes. Consequently, there are sites for a further 3,300 dwellings to be found under six differing strategic growth options. Option 6 would disperse development and include Urban Growth. This option would include up to 200 new dwellings in the Northern Fringe northwest. As with option 4, Landform do not object to an element of dispersal within sustainable service villages, but there should be a greater focus on the NDR and its relationship with the Norwich fringe.

8. *Cornerstone Planning Ltd on behalf of Barnham Broom Golf and Country Club* - Option 2 and Option 6 appear to offer the most likely opportunities to accommodate the type of development being promoted by Barnham Broom Golf and Country Club, although none would make direct provision for such an innovative approach to providing housing to meet specific group/s and related needs.
9. Whichever of the options is pursued, sufficient flexibility is necessary to facilitate the type/s of development being promoted. We acknowledge that what we propose does not fit into the usual structured and conventional housing provision strategies. However, it does seek to address a specific and identified need. Adding an under-met and growing need for accommodation suited to the particular demands of the 55+ ageing demographic, as well as for those seeking affordable/first-time homes, and for in-bound tourism, is not straightforward. However, for those seeking to settle within and move to the Norfolk/Norwich area, as it continues to become an increasingly popular destination and desirable place to live, we believe the existing infrastructure makes such provision at Barnham Broom desirable, viable and sustainable.
10. *DHA Planning on behalf of Pelham (South Wymondham) Ltd* - Notwithstanding the lack of clarity about the baseline assessment, six growth options have been presented to determine the most appropriate distribution of the residual 3,300 homes. The growth options provide alternatives with varying degrees of concentration nearer Norwich, focus on transport corridors and dispersal around the area, including the potential for a new settlement. Option 6 promotes dispersed and urban growth. However, the associated key diagram shows this urban growth being concentrated around Norwich, which broadly aligns with Option 1. To our mind a strategy based around urban growth of the existing Main Towns has merit, but this should not be restricted solely to Norwich.
11. *Savills on behalf of a number of clients including Thelverton Farms, the Trustees of Major JS Crisp, J Fenwick and Ditchingham Farms* – the NPPF promotes sustainable development in rural areas with housing located where it will enhance or maintain the vitality of rural communities. This can make a significant contribution to the maintenance and continuing provision of local services and facilities for community use. Option 6 considered to align closely with NPPF allowing for the growth of villages alongside larger urban areas as a means of ensuring long term sustainability across the settlement hierarchy. It is vital that any strategy recognises the contribution that smaller settlements can make to delivering a sustainable long term strategy for development.

12. *Savills on behalf of G H Allen (Farms) Ltd and Rippon Hall Farm* – All of the options for growth suggested direct growth to the rural area which is consistent with the provisions of the NPPF and the proposed vision for the Greater Norwich Local Plan. It is important that the emerging Local Plan acknowledges the benefits of allocating small and medium allocations throughout the Greater Norwich Area. Specific support given to Option 6 which seeks to direct development to the urban area with dispersed growth across the Greater Norwich Area.
13. *Poringland Parish Council* – Dispersal to smaller rural villages with small developments is more sustainable and beneficial to the community. Brings in families, affordable homes and helps small builders. The city needs housing for people who work there. Garden Village is an incentive for people to come in and ‘own’ their own community. Affordable housing should be included in smaller sites to ensure social sustainability.
14. *Weston Longville Parish Council* – growth should be concentrated in the already urbanised areas, with dispersal being on a scale that matches the existing settlement sizes.
15. *Wymondham Town Council* - The Town Council has undertaken an initial assessment of the emerging (Regulation 18) Greater Norwich Local Plan documentation and offers responses to the 6 options outlined. Option 6 Dispersal plus Urban Growth - Proposes that a higher number of homes are found within the fringe parishes of Norwich and an additional 1100 are added onto the Other baseline which is likely to have an unquantifiable impact on Spooner Row. Only an additional 150 to be distributed between Wymondham, Diss and possibly Harleston are proposed on top of the baseline. This was considered to be a good option as it proposes only a limited number for the Town.
16. *Tivetshall Parish Council* supported this option in conjunction with option 3 but noted that the villages in the parish should have had Outdoor Recreation and Journey to Work by Public Transport included within the secondary services they offer.

There was also one comment made against Option 6:

1. Dispersal plus Urban Growth. This is a worst of all worlds growth model which fails to capitalize upon economic opportunities, delivers unsustainable and damaging growth in the countryside and over-intensifies development in the city centre to the detriment of place quality and economic opportunity.

None of the options

A number of respondents did not support any of the six options or did not specify a preference as to which option was chosen, although a number of consultees expressed infrastructure concerns regardless of which option is chosen. Comments were:

1. None of these because they are not adequately disaggregated. Option 2 would be ok if it referred to railways and roads with high quality bus routes but the implication is that the main emphasis is on any roads regardless of public transport. This is unsustainable. Furthermore it is not about numbers so much as kind and density of housing. Until that is considered, location cannot be.
2. Would object to adopting any single one of the Options as currently set out. We agree that fringe locations should be supported as a broad location for growth, in particular Costessey
3. Disagree with an approach to land use that favours one single release option. This is overly simplistic and fails to play in important viability, locational and economic development factors which are site specific. The planning approach should instead adopt a set of robust principles of development and apply these at both the level of

land release/infrastructure model and on a site by site basis. This could be underpinned by the creation of an urban spatial model for the whole county which could interrogate the impacts of different option scenarios on a more accurate and interactive basis. A national spatial model has already been created by the Cities Foresight project at BEIS. Also a strategic land and infrastructure entity should be set up to take forward strategic land and infrastructure investment to unlock key strategic sites in the public interest and take forward and develop projects.

4. The 1500 in Norwich can be accommodated on brownfield land and the rest is not required, thus saving greenfield land. Dispersal will increase car dependency as will suburban growth. The transport corridors will foster ribbon development as will the new settlement option as too close to Norwich and will simply lead to expansion into a conurbation. The Cambridge to Norwich Tech corridor has pluses but needs to be looked at on a sub-regional basis with a self-supporting new town with station on brownfield land, otherwise the plan will encounter car dependency, ribbon development and conurbation sprawl.
5. I offer Option 7 – 'proper' Dispersal plus urban growth and Garden Village: One of the big problems in South Norfolk is the viability of settlements. The lack of diversity is meaning there are few young families who support schools and make local services viable. If these settlements are to survive and maintain sustainability it needs an influx of young working class families. There are over 100 parishes in South Norfolk – many of which are unviable administratively and are becoming monocultural and populated by one segment of the class spectrum, with no other faces that indigenous aged middle class visible. Shared out amongst the parishes, this would have the result of vitalising communities, encouraging small scale development and improve the viability and the public good. The policy of piling on development where infrastructure is available or accessible is coming to its logical end. It is producing a skewed, monocultural hinterland to Norwich. 25 homes in each parish?
6. The question is academic as the existing allocations with phasing can accommodate the housing requirement.
7. *Anglian Water Services Ltd* – No preference relating to the housing growth options however there is a need to consider the implications of any preferred option for Anglian Water's existing water and water recycling infrastructure. With regard to Water Cycle Study we would welcome further discussions regarding the scope of any technical study in the context of the Draft Water resource Management Plan and Draft Long Term Water Recycling Plan which are being prepared by Anglian Water to work with the Local Plan team and ensure there is no duplication.
8. *Broads Authority* – is content to focus on specific sites, where they are and what they are for, rather than commenting on the strategy
9. *Great Yarmouth Borough Council* – No preference as to which of the six growth options is chosen but whichever option is chosen will need to have infrastructure delivered in a timely way. Great Yarmouth will continue to work with other Norfolk authorities to encourage significant infrastructure such as dualling of A47, rail improvements, improved broadband connectivity, focussing on cross boundary issues with the Greater Norwich area such as the A47, A143 and the Yarmouth to Norwich railway line.
10. *Highways England* - The GNLP states that 7,200 additional dwellings are required to meet the target housing growth identified above. We acknowledge that all options outlined include the same "baseline position" which provides for 3,900 of the 7,200 homes. The remaining allocation of 3,300 dwellings varies between each of the six options. The growth options provide alternatives with varying degrees of concentration

towards Norwich, transport corridors and dispersal areas throughout the region. We consider that if 42,887 dwellings and 45,000 jobs are delivered in the plan period then there could be a significant impact on the operation of the SRN and that considerable mitigation measures may be required.

Highways England has undertaken a spreadsheet assessment to assess the potential impact of each housing option on the SRN. The GNLP indicates that the chosen strategy may be an amalgam of the options, therefore impacts may differ if an alternative option is identified at a later stage in the plan process. We acknowledge that the GNLP does not quantify the potential impact of the proposed options on the highway network and it is unclear how these options could be assessed in the future. It is recommended that details on the assessment of the impact of the selected options should be included in the GNLP as it is important that an appropriate evidence base is established. We acknowledge that reference is made within the GNLP to the Norwich Area Transportation Strategy (NATS), which is identified as the detailed means by which transport improvements can be identified. Section 6.38 of the GNLP indicates that the GNLP will include a policy on supporting strategic improvements, an approach that is welcomed but will need to be reviewed by Highways England when the policy is included. We consider that it is unclear at this stage whether it will be possible to identify, fund and deliver sufficient infrastructure to mitigate the impact of the preferred Greater Norwich development proposals.

In carrying out the spreadsheet assessment Highways England has applied a number of assumptions in order to assign and allocate the sites to an area for analysis. Highways England acknowledge that if these assumptions are not consistent with the specific development locations associated with each option then the spreadsheet assessment may not accurately predict the total number of development trips that could route via the SRN junctions. The spreadsheet assessment undertook a trip generation, distribution and assignment approach utilising the TRICs database, 2011 Census Journey to Work data and online map routing to estimate the impact on the SRN of each option. Analysis shows that:

- Each option will result in notable impacts on the majority of key SRN junctions within and surrounding Greater Norwich, in particular A47 junctions on the Norwich bypass and the A11/B1335 Harts Farm junction in Wymondham
- The A47/A11 Thickthorn Interchange will experience the greatest impact for all the housing growth options, with Option 1 and Option 3 having the largest impact.
- The greatest impact on the junctions on the A11 is expected to be the B1135 Harts Farm Road junction, with greatest impacts from Option 3.
- Overall Option 3 is predicted to have the greatest impact on the SRN as a whole
- Many of the junctions on the A47 Norwich Bypass are already known to experience significant levels of congestion which will be exacerbated by additional trips. In addition to the A47/A11 Thickthorn Interchange the A47/A140, A47/A146 and A47/A1042 junctions all currently experience queuing in peak hours.

11. *Historic England* – Does not advocate a specific housing growth option, in every option however the impact upon the historic environment will be important. The capacity for the area to accommodate new housing development whilst maintaining its historic environment should be a key consideration for sustainable development. Where redevelopment opportunities are proposed enhancement should be a priority. Allocation of new housing sites should be considered in the most sustainable locations and should get the right densities and character appropriate to the area. This approach

will require careful and detailed analysis of locations to ensure that the distribution of housing is appropriate. The historic environment is a critical factor in this analysis in terms of considering the ability of sites and locations to accommodate new housing without undue harm to heritage assets and their settings.

12. *NHS Norwich CCG* - The growth options presented will present the same volume of impacts on the Health system. The planning of primary care services cannot be determined in detail until the locations of development become apparent in greater detail. It should be noted that certain areas in the Greater Norwich area have less capacity in general practice than others. The preference will be focussed on development being accessible to local health services with minimal impacts on transport planning requirements for patients.
13. *Norwich Society (Mr Paul Burrall)* - We are concerned that there seems to be an acceptance that the current agreed allocations are all still the best available and would like to see a proper review of these as well as consideration of new allocations required to meet the current expected need.
14. *Armstrong Rigg Planning on behalf of Saltcarr Farms Ltd* - there should be a shift in emphasis within the plan away from the significantly urban-focused approach contained within the adopted Joint Core Strategy towards one that recognises the sustainability credentials of, and high levels of accessibility afforded to, a wider range of settlements across the plan area. This approach is necessary to ensure that the backlog created by the characteristic under-delivery of strategic sites within the NPA is not exacerbated into the new plan period.

It should be recognised that Norwich's sphere of influence spreads far wider than the immediate area and to accommodate commuting patterns and travel to work areas Main Towns and Key Service Centres of the plan area should serve as the focal point for a substantial level of sustainable growth delivered on a variety of sites ranging from 50 to 300 dwellings, the smaller of which can be delivered quickly with the larger sites offering a level of viability that can provide significant enhancements to local infrastructure and existing transport links. This should be complemented by a wide-ranging series of smaller local-level allocations in some of the more substantial and/or sustainable other villages of the plan area.

15. *CODE Development Planners Ltd on behalf of Drayton Farms Ltd and Ben Burgess Ltd*— believe that each of the stated options have both strengths and weaknesses, however none of them present an ideal option for growth. They suggest a favoured reasonable alternative in response to Question 11.
16. *Harvey and Co* - none of the 6 alternatives will on their own satisfactorily achieve the overarching objective. To begin with, we would question the validity of the baseline assumptions on the basis that:- the opportunities for development on brownfield sites in Norwich are becoming increasingly limited; focussing too heavily on Norwich for housing will mean that sites for other essential uses such as offices and industry will be largely eradicated and the remaining proposed numbers in the baseline option will locate a large amount of development in areas already subject to substantial housing allocations with no evidence that they can absorb further housing or viably provide new services.
17. *Pigeon Investment Management on behalf of clients*— Do not identify a preference for a particular option at this early stage in the plan process although the top three tiers of the hierarchy should be the focus for growth.

18. *Wood PLC on behalf of Hopkins Homes* – support a spatial option that would give sufficient policy weight to enable Wroxham to perform its role as a Service Centre. The GNLP should provide a spatial option which balances the need to locate new development in larger settlements which have access to public transport links with the development needs of other locations such as Wroxham. Options which place too much emphasis on the main urban area (options 1 and 2) should be avoided over concerns about deliverability and over emphasis of sites in the main urban area. Options which propose new settlements should also be avoided (options 3 and 5). A settlement of 500 homes will not be at a scale which can deliver sustainable development. Instead the Council needs to provide an option which balances the needs of urban and rural areas but is also focussed on locations which are deliverable and can provide sustainable development e.g. Wroxham.

Combination approach

A number of respondents suggested that a combination of the suggested options would be the best approach. Comments were:

1. A combination of the above options would provide the best option. Norwich (within the southern bypass/NDR ring) and settlements on transport routes should take a significant share to mitigate the transport pressures on less suitable routes. Brownfield sites could be developed together with the fringe villages to maximise the benefits of public transport. Combining this with dispersal in rural villages, to share the remaining growth more evenly, would reduce the scale and rate of growth in those villages which are becoming urbanised at a rate they cannot readily cope with. It would also help sustain schools, shops and a more vibrant village life in those villages in danger of losing theirs.
2. Because of your statement "Options 1, 2 and 3 perform better than alternatives 4 and 5 in relation to plan objectives that seek to improve air quality, reduce the impact of traffic, address climate change issues, increase active travel and support economic development. This is a result of the better geographical relationship of development under these options to services, facilities, employment opportunities and sustainable transport options."
3. Options 1, 2 and 3 are already best served with infrastructure, and suitable for larger scale developments which the larger firms are able to provide. The railway to Cambridge, running alongside the A11/A14, forms a potentially invaluable communication link which is so far woefully unexploited (pitiful frequency of trains to stops en route to Cambridge/Ely). I dispute the statement regarding Options 4 and 5 that they "are more likely to address the draft plan objective to deliver homes. This is because they provide for a much wider dispersal of development, and in doing so increase diversity, choice and competition in the market for land, which should be beneficial for delivery". However, they are more likely to be served by windfall developments from smaller developers and builders which are likely to be much more sustainable than large scale developments.
4. The reason for selecting 3 is not because it's an ideal but because it provides the most sensible option of not smothering the small, beautiful Service and Other villages of Norfolk with building sites for the next 18 years and sharing homes around the best placed existing main towns who have the required facilities. Options 4, 5 and 6 provide the nightmare of shifting the housing boom to all the small picturesque villages that makes this county great and relieving the main towns. This is ridiculous. Residents of the city and large town enjoy trips out driving through the villages. I've lived in cities

and suburbs much of my life and I had no problem with suitable development because I expected it. What I didn't and don't want is a vanilla county. I actually believe you should go for 1 or 2 new settlements and put in place an infrastructure to service it. Don't continue this ridiculous bolting on which is not working. So for me 3 is the best but please read on. Consider 2 settlements within Option 6, reduce the Service/Other village option to no more than 500 and balance the saving in the other categories. You must surely go for new settlements and allow the small villages to grow at a sensible rate given their very poor access to services, rail, road and buses etc.

5. Options 1, 2 and 3 are the areas best served with infrastructure to support the basic assumptions of the report of 'sustainable access from homes to services and jobs will remain the key considerations for good planning'. Dispersal options 4, 5 and 6 will add to the pollution by private car along with others detrimental factors and fall short of the sustainable access idea.
6. These are the least worst options. However, I only favour options 1 - 3 if the highest quality countryside can be protected by a form of green belt or at least green "wedges" to protect river valleys and other sites of greater wildlife value. The Plan should seek to create self-contained communities with shops and services which are close to employment areas, reducing the need to travel. Options 4 - 6 would result in houses scattered widely across small villages, increasing dependence on the private car. Option 3 - A new settlement cannot be justified.
7. To achieve the required level of development a variety of strategies should be employed. Smaller villages, such as Fornsett and Tacolneston, cannot cope with large developments, but modest amounts of growth on sites with suitable access to main transport routes should not be ruled out. However, many of the roads (in our village and many others) are single track, without passing places and are not suitable for further development
8. I think there should be development in market towns and larger villages to enable those settlements to maintain a services to the residents. The additional attraction of this that small projects come to fruition quicker than the large projects e.g. the Beeston Park development. I think there should be development along transport corridors to the south which enable Norfolk residents to get to Cambridge area. The remainder should be preferably on brownfield sites in the urban areas.
9. Echo comments from the CPRE. You cannot keep loading villages like Poringland and other villages deemed to be in the Greater Norwich Policy Area with more houses with no new roads. Poringland needs a by-pass now, that's without a further 600 houses. The B1332 cannot take any more traffic. At peak times traffic is queued back from the round-about. Furthermore aggressive developers seeking to use housing shortfall as a way of getting planning permission by the back door in rural areas has to be stopped. The NPPF should not allow people like Gladmans to use the housing land shortfall to push through housing developments in the wrong places, like the scheme Gladmans have put forward on Burgate Lane, Poringland (2017/2652) for 165 houses. This site was not put forward for site selection, Gladmans are seeking to get permission outside of the GNLP process.

Favoured option (subject to impact testing via proposed urban spatial model as discussed above) would therefore be a combination of Urban Concentration included regeneration of key city centre sites to an appropriate level of height and density given historic context and need to balance with economic and community infrastructure uses, and delivery of strategic urban extensions; in combination with Norwich-Cambridge

Tech Corridor and public transit oriented development along public transport growth corridors.

The delivery of highly planned growth supporting a sustainable public transport-oriented growth model would allow for a highly rigorous approach to be adopted to the determination of applications on rural settlements such that these would need to demonstrate high levels of design quality and positive impact in terms of maintaining or adding to social infrastructure, and supply site specific housing demand/need.

10. *New Anglia LEP* - We support the best possible strategy for supporting the delivery of economic growth and it's supporting infrastructure.
11. *Armstrong Rigg Planning on behalf of Orbit Homes* – Whichever growth option is selected it must place far more emphasis on the delivery of new homes in and around the more sustainable settlements within Broadland and South Norfolk than the current plans. This should be done with the intention of alleviating issues relating to affordability in both Districts, which is a far greater issue than in Norwich. The housing requirement must be distributed geographically in accordance with the standard methodology housing figure to ensure that affordability issues are not increased in South Norfolk because homes are delivered in the wrong location. We support a spatial strategy that identifies the most sustainable and best connected settlements in South Norfolk while also supporting the wider strategy for jobs growth in the Greater Norwich Area. A combination of Options 2 and Option 3 is favoured. Allocation numbers in the main towns should be increased. Wymondham is particularly well related to most significant employment areas in Greater Norwich.
12. *Armstrong Rigg Planning on behalf of Westmere Homes* - recommend a combination of Options 2 and 3, focusing on the delivery of new homes and infrastructure to meet the needs of the local jobs market centred around an expanded NPA, including the Main Town of Aylsham, with a greater level of growth planned for the more sustainable rural settlements in Broadland and South Norfolk.

Norwich's sphere of influence in terms of commuter patterns and workforce spreads far wider than the immediate Norwich fringe. There is a strong trend towards in-commuting and the preferred growth option must recognise this and cater for the nature of the local housing market. This has been recognised by South Norfolk Council, with its Leader, Cllr John Fuller, providing strong support for an increased level of dispersal of growth across the Plan area.

A combination of Option 2 and Option 3 would achieve the following:

- The apportionment of growth towards the most sustainable and accessible towns and villages across the plan area, settlements that are particularly under strain from the high levels of demand placed on them by commuters and would benefit from increased choice in the local housing market;
- Best utilising the additional finance for infrastructure drawn down as part of the City Deal, development of stronger linkages between the Norwich Urban Area and its outlying larger towns and villages;
- The ability to identify a wider range of sustainable and deliverable sites to meet the housing needs of Norwich's Core HMA away from the under-performing strategic sites located within the current Norwich Policy Area (NPA);
- An orientation of additional growth away from the stalling Growth Triangle quadrant of the NPA; and
- The ability to deliver homes in locations that would support both the jobs required as part of the City Deal as well as a prosperous and thriving rural economy.

The Main Towns and Key Service Centres should serve as the focal point for a substantial level of sustainable growth delivered on a variety of sites ranging from 50 to 300 dwellings, the smaller of which can be delivered quickly with the larger sites offering a level of viability that can provide enhancements to local infrastructure and existing transport links. This should be complemented by a wide-ranging series of smaller local-level allocations in some of the more substantial and/or sustainable other villages of the plan area.

Currently the maximum level of growth allocated to the Main Towns is the figure included as part of Option 2, 1,650 homes to be distributed between Aylsham, Diss, Harleston, Wymondham and Long Stratton (once planned growth is delivered). This figure should be increased to approximately 2,750 homes across the four Main Towns. This would result in a basic housing allocation for each Main Town (Long Stratton included) of approximately 550 dwellings, a figure that should then be adjusted considering a range of issues and constraints. It is recommended that the Main Towns proposed to fall inside the NPA (specifically Aylsham, Wymondham and Long Stratton) should, by default, be expected to deliver growth in excess of this figure due to their functional relationship with the Norwich Urban Area and their place within the city's core HMA.

Aylsham, as the only 'Main Town' within Broadland and the only settlement at this tier of the hierarchy to the north of Norwich, should be viewed as a notable rural growth point. It comprises a wide range of shops, services and community facilities capable of supporting significant levels of additional growth. It is well connected to the strategic road network with the A140 providing immediate road and public transport links north to Sheringham and south to Norwich city centre. It is our view that Aylsham should appropriately accommodate approximately 750-1,000 homes, suitable land for the majority of which is identified within the HELAA including our Client's land to the north east of the town.

13. *Barton Willmore on behalf of Landowners Group Ltd* – preferred option is a hybrid version of Options 2 and 3. No evidence presented that supports the baseline of spreading 2,200 dwellings and recommend that the baseline should only apply to 1,700 dwellings in Norwich City, which is assumed to reflect the additional dwellings necessary to deliver the City Deal and is therefore broadly acceptable. Query the placing of locations in sustainability order to support the options which leads to a location such as Hethersett (a Key Service Centre) being deemed more appropriate for large-scale growth because it is closer to Norwich than Wymondham (a main town). The increased status of certain locations in the broad 'Urban Area' definition risks them receiving a disproportionate level of growth which is not an accurate representation of their sustainability and this has come through in some of the Option put forward.

While the hierarchy is a starting point it does not determine the scale of development appropriate in a particular settlement. This will depend on a number of factors e.g. local service, deliverability, location in relation to strategic services and job opportunities, as well as local constraints and opportunities. The strategy for growth will be influenced by key factors, most importantly opportunities to achieve the visions and objectives of the plan and measures to deliver economic, social and environmental sustainable development, this leans towards options 2 and/or 3 and the role that Wymondham can play. It is acknowledged that the chosen strategy may be an amalgamation of the options with no 'preferred' options identified at this time.

Through the allocation of sufficient growth to Wymondham the GNLP has the potential to resolve the ongoing Secondary Education capacity constraint in the south-west area. This is identified as an existing constraint in the Interim SA but the consultation fails to regard how the alternatives would influence this. Currently any growth attributed to the south-west of the district has the potential to exacerbate this issue with the risk that a no-growth option could be considered if the situation is not suitably dealt with. It is considered that a 'no growth' option within the south-west area is not an appropriate alternative and the education issue therefore must be dealt with through this plan making process.

The preferred alternative is one which includes 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 to achieve the objectives of the GNLP and should be assessed as part of the Sustainability Appraisal.

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.

14. *Pegasus Planning Group on behalf of a client* - My client favours options 2, 4 and 5 as these would allow for his site at Heywood Road, Diss (GNLP0250) to come forward. The remaining options offer limited growth at Diss and are not supported for that reason. Further submissions on this have been made under the Site Proposals consultation to demonstrate the deliverability of this site. My client considers that it is right that the eventual option allows for a reasonable proportion of growth at Diss as a main town that is well supported by facilities and offers the opportunity to deliver sustainable development. For that reason, it is difficult to choose a preferred option and it is likely that a further option that blends the current 6 is likely to be more favourable.
15. *Caistor St Edmund Parish Council* - This area has seen a huge amount of development over the past 10 years with many sites currently under construction or already approved for development. These developments have already had an impact on the area including traffic/congestion, schools, health care and village environment.

Having read the options in the plan we feel that better options would be as follows:

- Building of a new town – new and appropriate infrastructure can then be deployed as part of the development
 - A11 corridor developments would have less of an impact on surrounding villages and would leverage the main route into Norwich
 - Villages that require development – a number of villages in South Norfolk are likely to welcome development as we have seen over a numbers of years a number of village services and amenities are becoming unsustainable. This includes schools, shops and pubs.
16. *Fornsett Parish Council* - To achieve the required level of development a variety of strategies should be employed. Smaller villages such as Fornsett cannot cope with large developments, but modest amounts of growth on sites with suitable access to main

transport routes should not be ruled out. However, many of the roads (in our village and many others) are single track, without passing places and are not suitable for further development.

Other comments not directly related to an option

A number of respondents made comments not directly related to any particular option which are listed here for completeness:

1. **Hainford** should remain 'other village. No paths to school. No public transport for workers. Most of the village has problems with sewerage as the sewer cannot cope. Water table is very high and when two previous firms tried to sort of the problem they both went into liquidation. Still unresolved. Bus Company refuses to run anymore buses through the village as the road cannot accommodate large vehicles and the buses are being damaged. May the powers that be show some common sense.
2. *DHA Planning on behalf of Pelham (South Wymondham) Ltd* – notwithstanding the lack of clarity about the baseline assessment, six growth options have been presented to determine the most appropriate distribution of the residual 3,300 homes. The growth options provide alternatives with varying degrees of concentration nearer Norwich, focus on transport corridors and dispersal around the area, including the potential for a new settlement.

The success of the plan depends on the right site and landowner selections and confidence that sites will be delivered. In this regard, Pelham has previously promoted and is delivering major growth to the east and west of Silfield Road in Wymondham. Our client directly obtained the relevant outline permission for the existing planned growth and the land is subsequently now being delivered on the ground by national housebuilders Taylor Wimpey and Bovis Homes respectively. Pelham therefore has a good track record of delivery.

We consider that the delivery of Pelham's land could successfully be incorporated into the majority of the strategy options listed in the consultation document and we would stress again that our client's land is wholly deliverable. The land has no planning history of relevance nor any history of unimplemented permissions and there are no known impediments to the site being phased for early commencement within the 0-5 year period. No unexpected financial restrictions are anticipated that would impact upon the viability of the site nor that would prohibit development coming through within the early stages of the plan period. To the contrary, we consider there to be an opportunity to deliver a high quality and exemplar scheme. The site is in control of a single land owner and there are no complicated legal agreements or covenants that would prohibit the ability to bring the site forward early in the plan period. Taking all of the above into account, we respectfully request that the site continues to be considered as the plan progresses as it represents a suitable location for the growth and expansion of Wymondham in such a way that can be tailored to a wider strategy of growth and help meet the higher levels of housing and employment land that is needed.

3. *Barton Willmore on behalf of client* - The GNDP has identified six potential growth options for the Greater Norwich Area over the Plan period. The allocation of Site 4 for general unrestricted employment uses (B1c, B2, B8) with an element no more than 20% safeguarded for aviation development is essential to all growth options for the following reasons
 - 46.5 ha in size, being the largest site in the region suitable for employment;
 - Direct access to the NDR;
 - Proximity to the Airport;

- Principle of development established through outline consent;
- Single ownership and ability to deliver early in the Plan period; and
- Proven demand for B1(c), B2, B8 employment uses to support growth.

Site 4 is considered to be an appropriate “strategic employment” site and should therefore be allocated in the emerging Greater Norwich Local Plan with a maximum aviation restriction of 20% of site area as supported by the attached objective evidence. The allocation of Site 4 presents the opportunity to reallocate other less suitable employment sites for residential use to ensure the region has an adequate supply of housing land. This allocation would allow the market to determine the amount of employment uses instead of artificially restricting development to a specialist use where there is no proven need or demand.

Site 4 is the largest employment site in the region and suitably arranged and located to provide critical employment, manufacturing and strategic distribution services. If restricted, evidence suggests the site would remain undeveloped for the foreseeable future and all economic benefits outlined in this report not realised. This would be a significant missed opportunity for the region.

Question 10 Do you know of any infrastructure constraints associated with any of the growth options?

Over 100 respondents provided comments in relation to this question. Many responses focused specifically on infrastructure for the growth options themselves, with a large number of respondents commenting on dispersed options (options 4 to 6) together.

Overview

A number of respondents commented more generally on infrastructure needs or on the specific needs for certain existing settlements (including detailed responses on settlement-specific infrastructure concerns received from *Dickleburgh and Rushall* and *Cantley Parish Councils*). **These comments are included within the summary for question 7.** A limited number of respondents took the view that the infrastructure needs resulting from planned growth would be so great, or consequent environmental and sustainability impacts so severe, that no growth should take place.

A broad range of groups and a large number of respondents argued that options which concentrate development would have fewer infrastructure requirements than those which disperse it. Many respondents further argued that more concentrated growth would also have fewer financial and environmental implications than dispersal and would assist the delivery of growth.

Related to infrastructure to support the growth options, there were several calls for the 'Western Link' between the A47 and the A1270 Broadland Northway (or NDR) to be built and the A47, A140 (s) and A1066 to be improved, as well as improved public transport, including bus services to Norwich Research Park (NRP), the University of East Anglia (UEA) and Norfolk and Norwich University Hospital (NNUH). Some respondents also requested new rail stations. CPRE and Norwich Green Party linked dispersal options with road infrastructure. CPRE suggested explicit carbon reduction targets and measures should be identified in the infrastructure section. Paragraph 5.41 and appendix 2 report responses on the general infrastructure question.

Alternative strategic growth options proposed included intensification of urban Norwich and 'super-dispersal' over more villages. Several respondents took the opportunity to repeat calls for co-location of homes and jobs. The CPRE suggested that 'phasing' would prevent the need for new allocations altogether. It submitted a petition signed by 64 town and parish councils (53% of all the parishes in Broadland and South Norfolk) requesting that ".....no new sites are allocated for house building in revised local plans to 2036 until all existing allocations in current core strategies have been developed". The Norwich Green Party emphasised the importance of access to services and called for new public transport infrastructure to be available prior to occupation of new housing sites.

Summaries of specific comments

Option 1 - Concentration

1. As well as those groups and individuals which argued against dispersed patterns of growth, a large number of the respondents to this question stated that the urban concentration option, option 1, would require the least amount of infrastructure. This included *Thurton Parish Council, Marlingford and Colton Parish Councils, CPRE Norfolk, Dennis Jeans Properties, Lanpro Services Ltd, Glavenhill Strategic Land* and *Silfield*

Limited. The CPRE stated that growth and infrastructure options should be considered in the light of the Paris Agreement 30% carbon reduction target, favouring concentrated growth options.

2. *UEA Students' Union* and other respondents stated that improvements would be required to the road and public transport networks in and around Norwich to improve air quality if development is concentrated.
3. *Brown and Co.* state that this option would overload existing services around the fringes of the city and risks Norwich losing its identity and sense of place.

Options 2 and 3 - Transport Corridors and the A11 Tech Corridor (with a new settlement)

1. Responses from *Diss and District Neighbourhood Plan Steering Group, Scole and Caistor St Edmund* parish councils and others on the transport corridor option (option 2) commented specifically on the A140 corridor in the south of the area. The responses focussed on the A140's limited existing capacity and the need for improvements to the road and the A1066 in and around Diss if growth is planned. *Suffolk County Council* also identified traffic constraints in the Diss area as an issue which should be considered. *Tivetshall Parish Council* support a dual carriageway bypass for Long Stratton extended north from the current proposal to the Hempnall crossroads, to be completed in advance of any new housing development.
2. There were also several calls for the 'Western Link' between the A47 and the A1270 Broadland Northway (or NDR) to be built and for the A47 to be improved, including from *Costessey Town Council* and *Drayton Parish Council*. Any delays to improvements to the A47 by Highways England were identified as a potential issue for option 2. *Costessey Town Council* also stated that the Food Hub commitments need to be taken into consideration with any future development proposals.
3. The *Liberal Democrat City Council* response stated that options 2 and 3 would be acceptable only if the transport corridors option is based on rail corridors and new stations are built. A new rail station is proposed for Thickthorn to serve growth at Cringleford and Hethersett plus a Park and Ride service to Norwich Research Park by a dedicated high quality bus link. A second new station is proposed for Fornsett (near Long Stratton) to serve the growth and commuting to Norwich or London.
4. *Climate Hope Action in Norfolk* and others specifically pointed to the value of feasibility studies for improvements in rail infrastructure for choosing growth options. The need for a study identifying the potential for light rail locally, including a train/tram or BRT link from Broadland Gate to Norwich Airport, was also identified by another respondent.
5. *Highways England* stated that Thickthorn interchange would experience the greatest impact for all options, and that the impact on the A11/B1335 junction to the north of Wymondham is likely to be significant, with option 3 predicted to be the worst for this junction and the strategic road network as a whole. Each option results in notable impacts on the majority of key junctions, but it was stated that without a known strategic direction, the eventual impact on trunk roads is unknown. Highways England supported the co-location of homes and jobs to take pressure off the strategic highway network. They also recommended that a suitable evidence base is prepared to assess the impact of the eventual preferred growth option to identify public transport and road infrastructure measures needed.
6. *Brown and Co.* support option 2 with a new settlement, stating that any new step change in the delivery of housing needs to be connected to infrastructure improvements. Honingham Thorpe is proposed for a new settlement which could deliver

infrastructure to serve growth with or without planned improvements to the A47. Other respondents argued that well sited new settlements could provide the infrastructure needed to serve new residents and reduce pressure on existing and for additional infrastructure elsewhere.

7. *Wroxham Parish Council* support option 3 as it could provide infrastructure with minimal settlement disruption. *Glavenhill Strategic Land* and *Lanpro Services Ltd.* consider that Option 3 with a new settlement at Hethel provides infrastructure opportunities by planning at scale for high quality housing, schools, and potentially further education linked to Hethel Technology Park. A new settlement would enable long term stewardship and land value capture through a Development Corporation or local development agreement. This can mean that the local authority is at the heart of the development process, providing leadership and reassurance on delivery.
8. Opponents of options 2 and 3 stated that development along transport corridors is the least favourable option as it would result in urban sprawl and greater car use. In relation to Option 3 *Brown and Co.* acknowledge that though some growth is likely to occur along the A11 corridor, the main proposed growth should be sited adjacent to the city.

Infrastructure requirements for dispersed options (Options 4 to 6)

1. A large number of respondents, including *Climate Hope Action In Norfolk*, *CPRE Norfolk*, *Wroxham*, *Thurton* and *Marlingford and Colton parish councils*, *Dennis Jeans Properties*, *Lanpro Services Ltd* representing, *Glavenhill Strategic Land* and *Silfield Limited* opposed dispersed options for development, stating that they would have the greatest infrastructure requirements.
2. Comments related to the need for additional and improved roads, education, health care, sewerage, water supply, broadband connections and other utilities, with concern also expressed about loss of agricultural land, landscapes and wildlife sites. Respondents also stated that dispersal options would put a strain on existing services in villages.
3. In relation to this, a petition was received calling on the bodies drafting the GNLP to only allocate new housing developments in places where shops, schools, employment areas and other services can be reached on foot or by frequent public transport, and to oppose the dispersal of new housing across rural areas. This petition had 539 signatories.
4. Many also stated that the dispersal options would have negative consequences for air quality as there is limited scope for sustainable transport modes so car use would increase.
5. *Brown and Co* made comments in relation to infrastructure for each of these options:
 - Option 4 (Dispersal) – was stated to be the weakest option and to be unsustainable as it ignores how services and facilities are located and should be provided, encouraging car use. In addition, it would be significantly reduce the ability for development to contribute to the delivery of services.
 - Option 5 (Dispersal including New Settlement) - was supported in that it incorporates a new settlement. In addition to a new settlement at Honingham Thorpe, there should be an appropriate level of growth in selected locations, but not in a completely dispersed manner. Other growth should be where services/facilities exist that can grow and accommodate further growth.
 - Option 6 (Dispersal plus Urban Growth) was stated to run counter to the NPPF and its main theme of delivering sustainable growth.

Limited growth in villages

6. Whilst not specifically opposing dispersed growth options, a number of respondents and some parish councils (*Dickleburgh and Rushall, Hainford, Starston and Framingham Earl*) referred to poor quality infrastructure in villages which limits their potential for growth. This included:

- Transport constraints caused by small roads, narrow or no pavements and related air quality issues;
- The limited number of places in primary schools;
- Sewerage constraints;
- Limited public transport;
- Poor access to shops and employment;
- Poor broadband.

No option suitable

7. *Harvey and Co* stated that none of the options on its own delivers what is required. The favoured option should:-

- Prioritise rail ahead of road use;
- Capitalise on Norwich's strength in the scientific/R&D sector;
- Not threaten existing settlements that have experienced substantial growth, often without adequate provision of public services;
- Create economies of scale to coordinate delivery of infrastructure;
- Minimise the impact on established communities;
- Plan for a comprehensive delivery option, in line with increasing encouragement and support from Government.

Question 11

Are there any other strategic growth options that should be considered?

Of the 94 who responded to this question, slightly more respondents (53) did **not** identify additional strategic options to the six offered in the consultation document than those who did (41).

Summary of specific comments

No

A number of organisations stated there were no additional options without adding further comments. These were *Brundall, Hellesdon, Dickleburgh and Rushall, Salhouse, Scole* and *Wroxham* parish councils, *Diss and District Neighbourhood Plan Steering Group, UEA Students' Union* and the *Wensum Valley Alliance*.

Other organisations and individuals made the following comments:

1. *CPRE Norfolk, Marlingford and Colton* and *Thurton* parish councils, along with a number of other respondents, stated that given the clear benefits of urban concentration in terms of the environment, traffic and transport, well-being of residents, housing being close to employment and services, and for the countryside, they would not support any of the other strategic growth options. *CPRE* also repeated their view that that if phasing is adopted, newly allocated sites will not need to be developed and therefore there is no need to build a new settlement. Furthermore, with phasing, the concentration option if chosen, would still not see the need for any new sites being allocated close to Norwich.
2. *Kimberley and Carleton Forehoe Parish Council* stated that is not aware of any other options. Sociological research is needed to see where the generation of the future are currently living, what their trajectory will be and where they need to be living in order to provide care for their elders. The state will not be providing this by 2036, so children will not be leaving the area in which they were born.
3. *Pigeon Investment Management Ltd* has not identified a particular strategic growth option and would raise concerns about defining a particular option at this stage of the plan in the context of the comments made in relation to the overall housing and job numbers. As the plan develops, the strategy may well be an amalgam of the options but Pigeon consider that the three top tiers of the hierarchy should be the focus for growth.
4. *Glavenhill Strategic Land* and *Lanpro Services Ltd* support Growth Option 3 with amendments for the reasons set out in their response to question 9. They do not consider that it is necessary to consider any other strategic options.
5. *Ben Burgess Ltd* and *CODE Development Planners Ltd* state that the selected strategic growth option must be designed to provide the best opportunity to achieve the plan's vision and broad strategic approach. The key elements to the success of the plan include identifying suitable sites in the most sustainable locations, closely related to existing and improved strategic infrastructure, aligned to the aims of economic growth and with the greatest likelihood of deliverability. While there will inevitably be a mix of dwelling numbers to be targeted towards various sectors, Main Towns, Key Service Centres and Other Villages, it is important to ensure that

homes are targeted to those areas most sustainable, deliverable and supportive of economic growth.

6. None of the other Growth Options would suit Reepham as a Service Centre, with nearby Aylsham having a significantly larger number of houses approved over and above its original Broadland Local Plan allocations.

Yes

Of those who responded 'Yes', some respondents suggested substantively different options to the 6 set out in the Growth Options document and others offered comments in relation to the options proposed through the consultation.

New Options and alternative approaches

1. *Brown and Co* favoured a hybrid option – a new settlement at **Honingham Thorpe** to deliver the necessary growth during the proposed GNLP plan period and beyond, with the use of the **settlement hierarchy** to focus some growth in the remainder of the three districts. Where previous proposals in current plans have failed to deliver or planning permissions have lapsed new alternative sites should be considered.
2. *Drayton Farms Ltd CODE Development Planners Ltd* favoured a higher number of homes to the **North/North West Sector** and **Colney** in the **South West Sector**, along with encouraging appropriate numbers in other areas. The selection of locations for specified housing growth numbers is not supported by adequate evidence. The following concerns are relevant:
 - a. There is a severe over-reliance on the delivery of an unusually large number of homes in the North East Sector of the Norwich area. Existing commitments already amount to 12,976. All six growth options contain baseline allocations of a further 200 homes, with Growth Options 1, 2 and 6 suggesting the possibility of an additional 1200 homes. Development is concentrated on a relatively small number of large sites where a relatively small number of housebuilders and house purchasers will be competing for sites and sales. The most likely reaction of the market will be to invest in less competitive and saturated locations. Assessment of market reality should lead to a substantial reduction in the number of dwellings for this sector.
 - b. The Main Towns outside the NPA (Harleston, Diss and Aylsham) should be identified for some growth proportionate to their functions as sustainable communities for their immediate hinterlands. In addition, the Main Town of Wymondham has accommodated substantial levels of growth over recent years and may need time to adapt before any further major allocations are made. Consequently the target numbers for the Main Towns should be at the lower levels of suggested allocations.
 - c. The reference to the parishes within the South West Sector should include Colney. Cringleford has had substantial growth over recent years and the adopted Neighbourhood Plan confirms that the majority of the previously undeveloped areas are already committed to development. Hethersett has also had substantial growth eroding the strategic gap. It is therefore difficult to see where within these two parishes further housing development could be accommodated. Little Melton sustainable than locations adjacent to the NRP and Cringleford. The relative lack of site availability in this sector

suggests the need to be careful in targeting large numbers of new homes to its parishes except Colney.

- d. There is no objection to identifying Service and Other Villages or Village Groups for proportionate scales of development and indeed for the purposes of promoting inclusive growth and social sustainability and supporting a thriving rural economy, limited development should be encouraged. However, it remains important to ensure that any growth is proportionate to the function of the settlement and designed to support and encourage economic growth rather than divert development away from the more sustainable and deliverable locations in and next to Norwich.
 - e. The West Sector including the parishes of Bawburgh, Costessey and Easton has limited additional and suitable land for development beyond that which is already committed. Large areas of land directly adjacent to Costessey is situated in the flood plain and in areas of landscape value. Easton has recently been the subject of planning permissions for substantial growth which will take time to assimilate into what is currently a relatively small community.
3. *Harvey and Co* favoured a **new garden village to the south of the A11 at Park Farm, Silfield**. The site is 354 hectares and could accommodate 6,500 dwellings, with substantial open space, green infrastructure, roads, local centre, schools and community buildings. The Government encourages locally led proposals for new communities that work as self-sustaining places, not dormitory suburbs. National planning policy has been strengthened to provide a more supportive environment for new settlements. Support is available to local areas to create garden villages on a local scale. It would be entirely appropriate and consistent with para 52 of the NPPF the GNLP to include a new garden village. Some of the obstacles to delivery and disadvantages of new settlements set out in the New Settlements topic paper could be addressed, including para 39 (*the need for a legal commitment to be made by landowners/developers with the councils*) of the topic paper.
 4. *Trustees of JM Greetham No.2 Settlement* supported Option 3 focussed on **Cambridge Norwich Tech Corridor (CNTC)** with replacement of the New Village with **dispersal along the CNTC**. This would fulfil the Spatial Objectives of supporting the Cambridge to Norwich Tech Corridor, and locate growth near to jobs and infrastructure. **Spooner Row** has the capacity to accommodate a generous scale of growth relative to the size of the settlement. This is due to its Service Centre status which should be retained and that it is a location that has delivered housing. It has good employment opportunities in Wymondham areas and is close to Norwich.
 5. *Otley Properties and John Long Planning* favoured a **combination option** based on concentration close to Norwich and fringe sectors, such as **Poringland and Framingham Earl**, and an element of dispersal to appropriate settlements in the rural area allowing village scale development in villages such as **Alpington and Seething**. Judgement on a preferred option is reserved until there is clarity on the OAN and overall housing numbers to be delivered.
 6. *Gladman Developments* considered that the residual target (7,200 homes) must be a minimum rather than a ceiling. Government policy for rural areas is to plan positively to capture their potential for economic growth and provide housing to meet local

needs. **Robust evidence is needed to support the settlement hierarchy.** This must cover:

- a. facilities, services and constraints of each settlement;
- b. how the settlement functions now and could function in the future;
- c. demographic and socio-economic profiles;
- d. employment opportunities and potential to host economic activity;
- e. travel patterns;
- f. the relationship with other settlements and the importance it has for the wider rural hinterland.

To maximise housing supply, a wider variety of sites in the widest possible range of locations is needed to ensure all types of house builder have access to suitable land which in turn increases housing delivery.

7. *Sirius Planning* considered that allocating areas of growth should be related to demand and land availability; it is not clear if the series of growth options presented can be achieved and whether they respond to identified demand. Consideration needs to be given to capacity of infrastructure and facilities, such as the healthcare and school system and whether there are any isolated communities which would benefit from additional growth to provide economies of scale for new infrastructure and service provision. This approach would determine the level of development required and the capacity to deliver, resulting in an accurate and appropriate growth scenario across the district.

Comments on other options

8. *CODE Development Planners Ltd* – The selected strategic growth option must provide the best opportunity to achieve the plan’s vision and broad strategic approach. The key elements to the success of the plan include identifying suitable sites in the most sustainable locations, closely related to existing and improved strategic infrastructure, aligned to the aims of economic growth and with the greatest likelihood of deliverability. While there will inevitably be a mix of dwelling numbers to be targeted towards various sectors, Main Towns, Key Service Centres and Other Villages it is important to ensure that homes are targeted to those areas most sustainable, deliverable and supportive of economic growth.
9. *Norwich Green Party* consider that option 1 or 2 are acceptable starting points for developing a final growth plan, but need considerable attention to the suitability of particular locations of significant growth. We therefore would like to outline a few basic principles to ensure allocations meet the needs of Greater Norwich residents:
 - The location of new development should pay regard to public transport routes.
 - Consideration must be given, for each site, whether a form of development is possible that will allow for services to be accessible on foot or by bicycle. For some sites, this could be by allocating a new district centre on the site itself.
 - Consideration must be given to preserving biodiversity and ecological value of land, especially within the river valleys, and including brownfield sites and railway lines.
10. *Bramerton Parish Council, Tivetshall Parish Council* and others favoured focusing development on brownfield sites in Norwich and the main towns at higher densities. Some respondents stated this shouldn't be in the form of high-rise blocks, which

would not generally be suitable for the area, but buildings of 3-5 storeys (including above shops etc.).

Other general comments included:

1. *Weston Longville Parish Council*: Put pressure on developers to prevent land banking and ensure current commitment is delivered before allocating new sites
2. *Hainford Parish Council* - New developments should be where existing services can be easily expanded e.g. schools, health services, public transport and avoid areas at high risk of flooding from any source.
3. *Framingham Earl Parish Council* - Put in place the necessary improvements in infrastructure which would encourage more companies to look at the area as having potential.
4. *Burston and Shimpling Parish Council* - There must be as many options as there are people prepared to consider the problem. The ideal would be homes within walking or cycling distance of jobs, or with dedicated transport links such as trams.
5. Focus growth on new settlements to achieve high housing targets and provide infrastructure.
6. Do not plan for growth, and push back against government targets or focus growth on brownfield sites in the Midlands and the North.
7. Plan on a regional scale, e.g. focus growth at Mildenhall and brownfield sites in Great Yarmouth or at a major new settlement in Norfolk of similar size to Kings Lynn or Yarmouth.
8. There is an element that planners job is to plan. Let local communities make smaller scale decisions as they see fit, rather than trying to command from the centre.
9. Use small sites identified in Neighbourhood Plans.
10. Focus more growth in villages, with small scale expansion of most villages (*Poringland Parish Council*). Each village should be grouped and proportioned by current size then expended by maybe 10%. By grouping villages you can then improve local facilities to cope with new demand in a structured way. This could also help with the roll out of fast internet to small villages.
11. Encourage small scale developments with self-build options but ensure that some of those homes are affordable even in a development of ten homes by making sure a percentage are local authority funded. Give greater support to self-build to shift away from large scale developments on the edge of towns.
12. Reintroduce a meaningful public housing programme with local authorities empowered to build and acquire publicly owned housing.
13. Demand the construction of more starter and affordable houses within areas with transport to support.
14. Avoid mass expansion of service villages and 'others'. They should be protected for the good of all as without our lovely county will be destroyed.
15. A combination of option 3 and option 5
16. Remove the village of Honingham from Norwich Fringe Parish designation
17. Supporting the A11 Tech corridor would be a good solution so long as services were supplied along with housing and jobs. Transport access would be exceptionally good.
18. Combines all growth options and, in accordance with national planning policy, allow development in sustainable locations, such as Costessey, whilst also supporting the sustainable and organic growth of rural settlements to prevent stagnation.

Question 12

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

Opinion was divided concerning new settlements, with a majority against. 58 responses received were in support of the principle of establishing a new settlement or settlements and 81 were against.

Overview

Most, but by no means all, parish councils which expressed a view were supportive of new settlements. Some expressed the view that a new settlement would improve delivery of infrastructure and the quality of development.

Other supporters of new settlements included some agents, *Norwich CCG* (subject to sufficient health capacity being available), and *Natural England* (subject to protection of designated sites or protected landscapes and provision of green infrastructure). Historic England supported the principle, subject to consideration of landscape and heritage assets. Among parish councils stating opposition, there was concern that a new settlement could affect the ongoing sustainability of existing towns and key service centres, or of the new settlement itself if funding for infrastructure was not forthcoming. *Honingham Parish Council* is not supportive of a new settlement within its parish.

The *CPRE*, *Norwich Liberal Democrats* and *Norwich Green Party* also did not support a new settlement. Norfolk Wildlife Trust were concerned that new settlements may result in recreational disturbance at some designated habitats which may not be fully mitigated.

Summaries of Specific Comments

Against

1. Respondents argued either that new settlements are not needed as they are not a sustainable form of development for a variety of reasons, or that in the case of Greater Norwich there are better, more sustainable and more deliverable options for housing development and as such there is no need for a new settlement at this stage.
2. **In principle opposition to new settlements** was based on the arguments that new settlements:
 - add to sprawl;
 - would threaten the vitality of existing settlements, and reduce the likelihood of brownfield development going ahead;
 - require significant investment in infrastructure and can be challenging and take time to deliver, with the draft NPPF and the thrust of current Government guidance being around housing delivery e.g. Northstowe, (Cambridgeshire), took 14 years from allocation to delivery of the first homes and Rackheath in Broadland has been slow to deliver. High costs can the viability and deliverability of affordable housing. (*Taylor Wimpey, Carter Jonas LLP, Pigeon Investment Management, Woods Hardwick Planning Ltd, Westmere Homes, Armstrong Rigg Planning*);
 - are developed on greenfield land and thus threaten the rural tranquillity which is characteristic of Norfolk (*Wensum Valley Alliance*), the rural built and natural environment and food production;

- Would require considerable political backing, with some respondents, including the *Norwich Green Party*, stating that this would be difficult to achieve;
 - would be very difficult to deliver in the current deregulated planning system;
 - could lead to poor quality, anonymous, car based development with poor access to services (*Norwich Green Party*). Milton Keynes and Stevenage were cited as examples;
 - are difficult to provide with employment, services, facilities and sustainable transport in their early phases.
 - put developers in the driver's seat;
 - lack or take time to develop a sense of community;
3. *Otley Properties* represented by *John Long Planning*; and *Weston Longville, Tivetshall and Hellesdon Parish Councils* stated that they were opposed to new settlements without giving specific reasons.

Opposition in the case of Greater Norwich was based on the following arguments:

4. Housing need in the area is not high enough to justify a new settlement; *Scole Parish Council, Norwich Green Party*.
5. Other strategic approaches for Greater Norwich are more suitable. A variety of views were expressed, with respondents arguing for:
- An urban concentration based approach (*Liberal Democrat City Council Group*) as it is easier and more sustainable for sites within and on the edge of urban areas to connect to existing walking, cycling and public transport networks and to access existing services and facilities;
 - A strategy based on existing settlements in the main communications corridors;
 - Growth being dispersed in villages proportionate to their scale *Woods Hardwick Planning Ltd, Thorpe St Andrew Town Council* and others;
 - A balance of concentrated and dispersed growth with no new settlement;
 - A wide range of deliverable sites being allocated to meet the needs in the earliest years of the plan period. Diversity in site, location and type of housing - including that to meet specific, identified needs such as for those of retirement age or seeking to acquire an affordable or first home - is the key to encouraging early delivery, as is building in locations where people actually want to live. *Norfolk Land Ltd, Barnham Broom Golf and Country Club Cornerstone Planning Ltd, Westmere Homes, Armstrong Rigg Planning*.
6. New settlements would detract from the sustainability and development of existing main towns and key service centres (especially in South Norfolk) *Diss and District Neighbourhood Plan Steering Group*.
7. If phasing is adopted in Greater Norwich, newly allocated sites will not need to be developed and therefore there is no need to build a new settlement. The existing plan should be implemented before creating new settlements. *Framingham Earl Parish Council, Thurton Parish Council*.
8. Promotion of a new settlement would require de-allocation of existing sites.
9. No specific site has been identified which is suitable. Some respondents referred to brownfield sites at large former air bases or vacant industrial areas being the most appropriate locations and some pointed to other locations, particularly Mildenhall in the

A11 corridor, which might be suitable for new settlement scale growth. Others stated that any settlement site should have a railway station. *Railfuture East Anglia*;

10. *Marlingford and Colton Parish Council* argued that although brownfield availability within the GNLP area is somewhat lower than the national situation, it is nevertheless difficult to justify the use of greenfield sites in other than very exceptional circumstances.

Qualified opposition

11. A number of respondents argued that new settlements would only be suitable if:
 - They are extremely well planned for self-sufficiency and energy efficiency;
 - They were on large vacant industrial sites or obsolete service bases. The local community would then theoretically benefit from upgrading infrastructure and maintaining the population base for schools and local businesses etc;
 - They are based on a large tech development area of several companies moving to the area;
 - There is a very strong spatial/market logic underpinning them. They must be supported by sustainable movement infrastructure, with land value capture to pay for the infrastructure required to make them self-contained settlements;
 - *Climate Hope Action in Norfolk* – [New Settlements] only considered after full exploitation of brownfield and city sites are developed as a low carbon community with strong low carbon public transport links, Passivhaus design, built in water management, recycling facilities, electric car charging points and integral community energy provision
 - *Norfolk Wildlife Trust* - If new settlements are taken forward they need to take full account of ecological constraints and need to deliver ecological enhancement in line with NERC Act 2006 and be developed in line with Norfolk Green Infrastructure/Ecological Network maps.

Specific sites

12. Comments were also made in relation to the two specific sites submitted for consideration as new settlements:

Hethel

- The Hethel site currently provides a key separation between the existing settlements of Wymondham, Hethel and Mulbarton. The cohesiveness of a new settlement will be many years in the making, as will the establishment of any services that would be required to support this new settlement. In the meantime, the already strained facilities and services within the nearest settlements would no doubt be required to take the extra burden.
- The Hethel proposal includes serious flood risk, risk of pollution and contamination from surrounding industries and the high cost of putting in an unnecessary infrastructure onto agricultural/green belt land. Other more sustainable options should be considered.

Honingham

1. *Honingham Parish Council* strongly object to this new settlement proposal on Honingham's doorstep as it would:
 - a. completely change the character of this sleepy village;

- b. affect attractive landscape in the River Tud valley, areas of ancient woodland, conservation areas and high quality agricultural land;
 - c. worsen surface water run off issues;
 - d. create the risk of further development between the new settlement and the existing village further blighting the landscape;
 - e. The overriding principle should be to disperse new developments throughout the Greater Norwich area, rather than imposing a huge new settlement as is suggested by this proposal.
 - f. The designation of Honingham in this settlement hierarchy seems to have changed from a village in the countryside, with no settlement limit to that of a fringe parish, without consultation, which surely is paramount on such a major change.
2. *Trustees of JM Greetham No.2 Settlement, Landowners Group Ltd, Barton Willmore* - The delivery of new settlements is risky and unpredictable, with the opportunities and constraints afforded by the submitted sites (Hethel and Honingham Thorpe) currently unknown until in-depth and detailed site investigation work has been undertaken. The costs of new infrastructure would need to be secured through a legal agreement with landowners prior to allocation, to capitalise the uplift in land values. 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. 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. Furthermore, it is not considered necessary for the GNLP to rely upon the delivery of a new settlement, as sufficient suitable and deliverable land is available within Service Villages such as Spooner Row and other sustainable settlements located within the CNTC.
 3. *Norfolk Wildlife Trust* - With regard to the proposed new settlement in the Honingham/Stamfield area, we have particular concerns regarding impacts on Ashwellthorpe Wood SSSI from recreational disturbance and on County Wildlife Sites between the proposed settlement and Wymondham, which are already under severe pressure from recreational disturbance. Unless impacts can be fully mitigated we are likely to object to this allocation in a future consultation.
 4. A private individual referred to the comment by Norfolk County Council in its responses to the NSF consultation in which it states "There is no evidence to suggest that a new garden village/town will be required in the County to deliver the required growth or that such a proposal would deliver sustainable development." The sustainability issues must be the key factor in this option and I do not consider a new settlement is justified.
 5. *CPRE* recorded their opposition to new settlements under question 11.

For

1. Many respondents were supportive of new settlements built to Garden City principles stating they could improve the delivery of infrastructure and the quality of

development (including *Wroxham* and *Caistor St Edmund Parish Councils*), in turn reducing the impact of growth on existing settlements and infrastructure, reducing urban sprawl and protecting villages, habitats and the countryside (*Bramerton Parish Council*).

2. Respondents stated that new settlements provide a solution to the housing problem, presenting the opportunity to build to high environmental standards and to set new design standards for Norfolk. *Little Melton Parish Council* referred to Richard Bacon's conference on Self/Custom build and the discussion of the potential for high quality new settlements.
3. New settlements should have high quality public transport, significant amounts of open space and the provision of local employment and services.
4. A number of respondents stated that a democratically planned, publicly led initiative with a significant element of affordable/local authority housing had merit.
5. *Brundall Parish Council* expressed support for new settlements away from greenbelts.
6. *Cringleford Parish Council* support the development of a new settlement, perhaps located between Hethel-Wymondham and point to a missed opportunity at Coltishall airfield.
7. *Salhouse Parish Council* support a new settlement as it may be the only way to deliver housing in the quantity required.
8. *Wrampingham* and *Barford Parish Councils* stated that new villages are in keeping with the rural life in Norfolk and should allow more families to participate in rural living with the benefits it can bring.
9. A new settlement along the Cambridge to Norwich Tech Corridor would attract the people with the right expertise for both Norwich and Cambridge and help ease housing and accommodation problems for both areas.
10. *NHS Norwich CCG* - Health and care partners and the STP support the long term development of a new settlement or settlements, providing consideration is given to the impact of growth on health and social care, including additional infrastructure that will be required. To ensure that health can respond to the growth associated with the GNLP in a sustainable way, the objectives of the STP must be considered at all stages of the development process as well as clear and consistent engagement with health and care partners to allow for forward planning to ensure sufficient capacity is available.
11. *Historic England* - In principle a new settlement could be an effective way of delivering the required growth across the plan area in a sustainable way, but this is dependent on the soundness of any future site allocations for a new settlement. Landscape and heritages assets should be considered from the outset when determining the location of a new settlement to ensure that development can be delivered whilst having regard to the these assets. It is expected that strategic new settlement policies makes reference to the historic environment and the need for its conservation or enhancement. Without this being demonstrated in the identification and justification of sites, and in the wording of the policies the Plan will be unsound. The consultation document outlines that any new settlement would considered in line with the Town and Country Planning Association's (TCPA) Garden City Principles. It is important at this stage to highlight that whilst these principles are useful and do embody a number of modern town planning concepts, they do not address the

historic environment. It is therefore unclear how the TCPA principles can be reconciled with the NPPF's definition of sustainable development in terms of its environmental strand which requires the conservation and enhancement of the historic environment. Whilst the TCPA Garden Cities Principles are silent on the historic environment, their 2017 publication "The Art of Building a Garden City" does provide a further level of detail, particularly on the siting of new settlements. It states that, "locations for new garden cities should not only avoid damaging areas that are protected for their ecological, landscape, historic or climate-resilience value but should actively be located in areas where there can be a positive impact on these assets. Underpinning the consideration of sites for new garden cities or towns should be the extent to which each one ... will allow for positive impacts on assets of historic value". The process of identifying the location of a new settlement or even whether this is the right approach for a local authority to take should be underpinned by a strong evidence base from an early stage. A key aspect of this will be the consideration of regional and sub-regional studies in order to inform the best location for a new settlement to satisfy need, these studies are crucial in terms of understanding connectivity and place before designation. If the option for a new settlement is to be taken forward we encourage the Council to follow this evidence based approach. It is also important to ensure that the decision regarding the need and location of a new settlement is locally-led. We are very reassured to see that the Greater Norwich New Settlement Topic Paper expands upon the TCPA principles and that point r) of the broad criteria for locating new settlements does consider the impact upon heritage assets.

12. *Glavenhill Strategic Land represented by Lanpro Services* - A programme of new settlements in conjunction with key settlement expansion is the best way to help bring forward the objectives contained within the GNLP. We believe that the text at 4.58 to 4.63 of the Growth Options document and the accompanying New Settlements Topic Paper, which is limited in scope, have failed to understand the benefits of such an approach. The barriers identified in this text, such as infrastructure delivery, should not be seen as prohibitive, as planned new settlements can create certainty for income streams and patient investment, to secure the required infrastructure and wider improvements. Therefore, in support of our submission, we provide our own background topic paper reflecting on expansion of existing and new settlements. [*The topic paper can be found [here](#)*]. We have the strong view that new settlements should be at the heart of the strategic growth plan for the Greater Norwich area, linked to the Cambridge Norwich Tech Corridor and the wider Oxford Milton Keynes Cambridge corridor. Our background paper sets out the benefits of new settlement planning, which has also been set out in our previous responses. There is a fantastic opportunity for the delivery of great new places in the most sustainable manner, by a careful site selection process that looks at available land that is deliverable, with 18 willing landowners and linked to existing employment areas, transport infrastructure in locations that minimise harm. Hethel offers just such a location; the site is under the ownership of one landowner, is physically linked to the existing hi-tech employment area at Hethel and provides easy links to the A11, Wymondham rail station and existing services in Wymondham to support the new village in its early stages of development. A series of new settlements has been part of the approach taken to secure the long-term growth of

Cambridge, which has seen this becoming a major national commercial hub and we believe that this will provide certainty to local authorities and developers. Furthermore, by supporting a new settlement at Hethel, it will protect existing towns from sprawling growth, which can be harmful to their character and context. New settlements can be part of a long-term plan where trajectories can be agreed and local authorities play a crucial role in ensuring that the development proceeds in line with a series of core values and principles, linked to good governance, long term stewardship and infrastructure funding. Overall, we believe that this is the only approach to secure the certainty, level of investment and infrastructure needed to achieve the aims and aspirations of the Plan and which has the capacity to accommodate the housing requirement of 11,000 – 14000 (see our response to Qu. 4) in a sustainable manner.

13. *Brown and Co.* believe that the comprehensive assessment of the suitability of our site detailed in section 1.02 supports the long-term development of a new settlement on the Honingham Thorpe site.
14. *Costessey Town Council, Dickleburgh and Rushall Parish Council, Burston and Shimpling Parish Council, Harvey and Co* stated that they support new settlements without giving specific reasons.

Qualified support

15. *Natural England* do not oppose the development of any new settlements provided these are located to:
 - a. avoid impacting on any designated sites (including local wildlife sites) or protected landscapes;
 - b. take full account of any environmental constraints and impacts;
 - c. and deliver quality GI measures in accordance with the Norfolk Green Infrastructure/Ecological Network maps.

All potential settlements identified should be screened to see whether they would exacerbate existing issues at nearby designated wildlife sites, particularly recreational disturbance. If this is the case, mitigation measures will need to be implemented as part of the development of settlement and this should be reflected in the relevant policies within the GNLP.

16. *UEA Students' Union* support new settlements if they are properly positioned, serviced and not at the detriment of the regeneration of existing areas.
17. *Kimberley and Carleton Forehoe Parish Council* support the development of a new settlement or settlements, as long as the infrastructure is in place and they are near to employment. However, their view was that the evidence on the integration of new settlements is not encouraging.
18. *Forncett Parish Council* supported new settlement development in principle, but stated that agreeing a suitable site will be problematic and the development of a new settlement will take many years before it becomes viable in terms of services.
19. New settlements offer the potential to attract commuters and businesses into Norfolk from Cambridge and London, though the 6 options do not identify what is required going forward.
20. New settlements should be considered alongside other options such as redevelopment of under-used retail parks and out-dated terraced housing areas.

Additional sites referenced

In addition to the new settlement sites already proposed through the consultation at Honingham Thorpe and Easton, the potential for additional sites were referred to through this question:

- At Little Melton close to the Watton Road transport corridor;
- East of the A11 and Station Lane, Hethersett, close to the Council depots, allowing an eventual return to service of the old Hethersett Railway Station;
- the Mangreen area close to the A140 and A47, with a Parkway station on the London rail line;
- A new development outside of the A47 and NDR that could be combined with a business park and further employment.

DRAFT

Question 13

Do you support the establishment of a Green Belt? If you do, what are the relevant “exceptional circumstances”, which areas should be included and which areas should be identified for growth up to and beyond 2036?

Overall, 84 respondents were in favour of a Green Belt and 38 were against. Other respondents did not state a clear preference.

Overview

There was considerable support for the establishment of a Green Belt, including from the CPRE, the Green Party and the Norwich Liberal Party, as well as a number of individuals and parish councils. A petition in support of a wedge based Green Belt with 1,912 signatures was submitted by the CPRE. There was also some opposition, particularly from the development industry, with a significant minority stating that the ‘exceptional circumstances’ required by Government for establishing a Green Belt do not exist.

Most of those in support of favoured a wedge based Green Belt, with protection of the river valleys, the development of green infrastructure links and retaining gaps between settlements being the priority. Many supporters stated that the scale of current and additional growth provided the ‘exceptional circumstances’ required by Government for a new Green Belt to be established and that existing landscape protection policies are not sufficiently strong.

Those opposing a Green Belt argued that none of the Government’s ‘exceptional circumstances’ for the establishment of a Green Belt could be evidenced in Greater Norwich. It was also argued that a Green Belt would lead to unsustainable patterns of growth by focussing development in locations with poor access to existing urban areas and employment and that current landscape protection polices provided adequate protection for valued landscapes. Others did not support a Green Belt as they felt it would prevent a ‘Western Link’ being built, though the reasoning behind this view was not made clear.

Summaries of specific comments

Support

Most of those in support favoured a wedge based Green Belt, with protection of the river valleys, the enhancement of green infrastructure links and retaining gaps between settlements being the priority. Many supporters stated that the scale of current and additional growth provided the ‘exceptional circumstances’ required by Government for a new Green Belt to be established and that existing landscape protection policies are not sufficiently strong.

The wide variety of issues that were raised in support of the establishment of a Green Belt are summarised further in the table below:

Issues raised	Organisations	Commentary
Prevention of urban sprawl		
1. Protect landscape setting of	A number of organisations argued that a	Most supporters argued for a Green Belt based on wedges, protecting most particularly the river valleys (including the Wensum, Yare, Tud and Tiffey), green

settlements and their identity, character and beauty	Green belt is required to strengthen existing landscape protection policies and prevent sprawl, including <i>CPRE, Norwich Liberal Democrat Group, Norwich Green Party, Wroxham PC, Brundall PC, Tivetshall PC, Diss and District Neighbourhood Steering Group, Hellesdon PC, Brockdish and Thorpe Abbots PC and Burston and Shimpling PC</i>	infrastructure corridors and areas around the NDR and Norwich Southern by-pass. Some argued such an approach should be used in conjunction with a strategy which focusses necessary development in and close to the Norwich urban area and away from smaller villages. It was argued that this approach would assist regeneration of brownfield sites. A number of examples were provided of where character should be protected, including the compact nature of Norwich itself, Trowse Newton, Bawburgh, Ringland, Old Costessey and gaps around Poringland. There was limited support for ring based Green Belt approaches. Some argued for other approaches, including basing a Green Belt based on commons around Norwich and commissioning an independent assessment to establish the most appropriate location for a Green Belt based on specific local characteristics. <i>Scole PC</i> argued that a Green Belt should not only apply to Norwich. A limited number of respondents argued for the establishment of a new settlement to prevent urban sprawl.
2. Prevent coalescence of settlements		
3. Focus development on brownfield sites		
4. Focussed development supports sustainable transport		
Health		
5. Green Belts support physical and mental health	<i>NHS Norwich CCG</i> and others	It was argued that Green Belts support environmental protection and active lifestyles by providing leisure opportunities and protecting green land from development, supporting physical and mental health.
Environmental Protection		
6. Protection of agricultural land and food security		This was cited as an issue justifying the need for a Green Belt.
7. Protection and enhancement of habitats and ecosystems services, including green infrastructure	<i>CPRE, Climate Hope Action in Norfolk (CHAIN)</i>	<i>CPRE</i> argue that it is necessary to protect and enhance ecological networks using “Living Landscape” principles based on river and green corridors, with <i>CHAIN</i> emphasising the overall importance of green infrastructure services to the environment. The importance of corridors linking urban and rural areas was also emphasised.
8. Weakness of current landscape protection policies	<i>Thorpe St Andrew Town Council, Norwich Green Party, CHAIN, CPRE,</i>	Respondents questioned whether existing landscape policies provide adequate protection and provided examples of valued landscapes that are or could be subject to development e.g. Yare Valley (including Norwich Rugby Club), Thorpe Woodlands, NDR

	<i>Cringleford PC, Wensum Valley Alliance and others</i>	(including a potential Western Link). A number of respondents argued that the establishment of a Green Belt would go a long way to alleviating fears about growth.
9. Reduction of flood risk	<i>Colney PC</i>	Colney PC stated that a green wedge approach will assist in reducing flood risk and promote non-motorised travel.
Economic development		
10. Protection of the character of market towns and villages		It was argued that the protection of the character of settlements provided by a Green Belt would support their economic growth.
Exceptional Circumstances		
11. Official designation required		Some surprise was expressed that a Green Belt had not previously been established in the area, and that this in itself is an exceptional circumstance. Some respondents (including <i>Weston Longville PC</i>) suggested there is a need to challenge the government's requirement for exceptional circumstances, questioning the process and the logic for such an approach. Others, including <i>Marlingford and Colton PC</i> , question the tendentious phrasing used in the Growth Options document. Others state that a positive approach to establishing a Green Belt is needed.
12. The unprecedented scale of growth, sprawl and potential coalescence	<i>CPRE, Norwich Green Party, Salhouse PC</i>	It was argued that the current planned growth represents the "major urban extensions" that the NPPF says can justify the establishment of a Green Belt. <i>CPRE</i> stated that a Green Belt is needed to retain Norwich's green and compact character and <i>Norwich Green Party</i> state that it is important that some areas are identified as being unsuitable for growth and planned positively for rural uses. <i>Norwich Green Party</i> argue that separation of settlements should be retained: <ul style="list-style-type: none"> • In the Yare Valley, including between Trowse and Norwich; • Between the A47 and Hethersett; • Along the Wensum/Tud valleys between Bowthorpe, Easton and Costessey; • On the defined GI corridors between Sprowston and Heartsease and Norwich and Rackheath. <i>Framingham Earl PC</i> argue a buffer is required between Norwich and its southern neighbours, with <i>Poringland PC</i> arguing specifically for separation to be retained between Trowse and Bixley and between Bixley and Poringland.

13. The need to protect environmentally sensitive locations	<i>Norwich Green Party</i>	<p>These are:</p> <ul style="list-style-type: none"> • Landscape character in the Broads and Wensum Valley east of the city; • Biodiversity in the Yare, Wensum and Tud valleys. <p>Overall in relation to these issues, Norwich Green Party state that even if a Green Belt is not designated, policies should be used to achieve aims in other ways.</p>
14. The construction of the NDR	<i>Hainford PC</i>	This was cited as a justification for a Green Belt.
15. Poor quality of recent development		This was cited as a justification for a Green Belt.

Against

Most of those opposing a Green Belt argued that none of the Government’s “exceptional circumstances” for the establishment of a Green Belt could be evidenced in Greater Norwich. It was also argued that a Green Belt would lead to unsustainable patterns of growth by focussing development in locations with poor access to existing urban areas and employment and that current landscape protection polices provided adequate protection for valued landscapes. Others did not support a Green Belt as they felt it would prevent a Western Link between the A47 and the A1270 Broadland Northway (or Northern Distributor Road (NDR)) being built, though the reasoning behind this view was not made clear.

Summary of specific points

1. A Green Belt would:
 - preclude the Norwich Western Link being completed;
 - reduce other green areas and amenity land in new developments;
 - increase densities. (*Costessey Town Council*)
2. A Green Belt is too simplistic and could have unintended negative consequences (*Little Melton Parish Council*)
3. A Green Belt in Greater Norwich would not meet any of the five exceptional circumstances (detail in 4 below) and would be inflexible for accommodating future growth strategies. The five purposes of Green Belt can be achieved by having an up to date adopted local plan with appropriate development management policies and the allocation of land to meet needs. (*Persimmon Homes, Sirius Planning FCC, Wood Plc, Hopkins Homes, Pegasus Planning Group, The Home Builders Federation (HBF) and others*)
4. It is not considered that any of the NPPF tests to justify new Green Belts would be met:
 - Demonstrate why normal planning and development management policies would not be adequate: The potential for a new Green Belt needs to be considered against the purposes of including land in the Green Belt, as set out in para 80 of the NPPF, including to check the sprawl of built-up areas

and to safeguard the countryside. These objectives can be met through other planning tools and policies. Growth can be controlled through the Local Plan, and through settlement boundaries.

- Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary; there has been no material change in circumstances since the adoption of the Joint Core Strategy to justify an exceptional measure.
 - Show what the consequences of the proposal would be for sustainable development; A Green Belt around Norwich will displace development to less sustainable locations resulting in less sustainable travel patterns and would not tackle the significant development needs. Sustainable development may also be more difficult to achieve and maintain in the longer term given the permanence of Green Belt designations.
 - Demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas: An isolated Green Belt around Norwich is difficult to justify and it is not necessary to contain growth.
 - Show how the Green Belt would meet the other objectives of the NPPF. A Green Belt must be considered as part of the comprehensive sustainable development strategy to deliver sustainable growth in the GNLP area. The need to provide new homes and employment is balanced with the need to prevent urban sprawl and maintain the openness of the countryside. However, the result of a Green Belt around Norwich would stymie development and would hinder the Councils from meeting the significant development needs, and requirement to allocate around 7,200 homes. (*Wood Plc, Hopkins Homes*)
5. Green Belts often prevent the most sustainable forms of development with housing needs having to be delivered in communities outside the Green Belt once the development capacity of the city and its suburbs have been reached. It would increase the number of journeys into the city and would be likely to have a greater environmental impact on countryside locations. (*HBF, Pigeon, MAHB Capital, Glavenhill Strategic Land and Lanpro Services Ltd on behalf of a number of clients*)
 6. Government are looking to amend the NPPF to ensure improved densities on appropriate sites in the urban area. This and the long-established commitment to the principles of urban regeneration reduce the need for Green Belt and one of its core principles of supporting the economic regeneration of our cities. The majority of Green Belt Reviews that have taken place in recent years do not even consider this purpose as it is largely believed to have achieved this aim. (*HBF*)
 7. Existing policies prevent urban sprawl e.g. the Southern Bypass Protection Zone, status of the Broads. (*HBF, Costessey Town Council and others*)
 8. The 'wedges' option looks like a compromise designed by committee, trying to satisfy those who'd rather there was no development while not impacting actual development.
 9. Mousehold, Beyond Green and the agricultural fields as well as walks along footpaths should be enough. Norfolk is a huge agricultural area.

Did not state a clear preference

1. There is no justification for a wide Green Belt as they are a form of economic protectionism by landowners that pushes up prices. There might be reason for a narrow Green Belt outside the A47/NDR to encourage development within that area.
2. Unsure about a Green Belt - in principle a wide green belt is a great idea, but this is not particularly well set out or visualised in the consultation. Further information on the proposed location is required before judgement can be passed. Do not support the Green Wedge as it is unsustainable and would create constant pressure on it for housing along all the margins. (*Kimberley and Carleton Forehoe Parish Council*)
3. *RSPB* would view any GNLP strategy which protects important wildlife sites favourably.
4. Currently there is a Green Infrastructure Strategy for Greater Norwich based on wedges, which maps GI corridors, within both Norwich and the countryside. An updated version of this map is being developed for the whole county by all of the Norfolk local authorities and NWT is engaging with this project in order to improve the ecological aspects of the strategy. Whilst we do not take the view that a green belt is likely to give better protection to areas of biodiversity value, more needs to be done to ensure that the Greater Norwich GI Strategy is effective in protecting and enhancing the biodiversity value of green corridors/wedges. The GNLP should ensure that policies and proposals allow for sufficient funding to be made available to ensure that the GI Strategy is delivered effectively. (*Norfolk Wildlife Trust*).
5. Though not necessarily a Green Belt, protected undeveloped land maintained and supported by inhabitants is essential for the health of any community.
6. We need the strongest possible planning protection for Green Infrastructure, and in particular, the Yare Valley Green Corridor. Considerations:
 - More attention needs to be given to creating and maintaining links between the Valley and surrounding green space to facilitate wildlife movement and recreational opportunities.
 - Existing “protections” proved insufficient to prevent South Norfolk District Council approving Norwich Rugby Club’s application. Would the Rugby Club example alone, or together with others, constitute exceptional circumstances?
 - Any Green Belt should embrace all the zones currently protected, including the River Valleys, and the Southern By-pass Protection Zone. It should also include a Protection Zone for the NDR and incorporate green links between protected green infrastructure areas.
 - Past attempts to adopt a statutory Green Belt for Norwich were unsuccessful, and since then Government pressure in favour of development has increased. Any Green Belt must have a sound strategic planning basis and cannot be created in isolation. It is essential to identify the areas of environmental importance (ecological and recreational) for protection and to integrate these into the development growth pattern for Greater Norwich, along with all the other constraints on development such as transport links and flooding.

A Green Belt is not necessarily the best starting point. We must ask GNLP Planners to consider carefully all options to find the one that maximises the safeguarding our “protected” green space, consistent with achieving the growth demanded by government. (*Yare Valley Society*)

7. Proposals for a Green Belt may have long term implications on the GNDP to meet its housing need. As a consequence there may be pressure on neighbouring authorities to accommodate this growth. (*Breckland Council*).

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NORWICH CITY CENTRE ISSUES

Question 14

Should the area defined as the city centre be extended?

Overall, many more respondents favoured retaining the current city centre planning boundary than those who favoured extending it, with 53 respondents against extension and 18 in support.

Summaries of specific comments

Support for no change

Organisations supporting retention of the current boundary included *New Anglia LEP, Sirius Planning, Indigo Planning, Norwich Business Improvement District, Intu, Norwich Green Party, Liberal Democrat City Council Group* and *NHS Norwich CCG*. Other local representative groups in support were *Diss and District Neighbourhood Plan Steering Group, Thorpe St Andrew Town Council*, along with *Brundall, Framingham Earl, Hainford, Hellesdon, Kimberley and Carleton Forehoe, Tivetshall, Salhouse* and *Wroxham* parish councils.

Main issues raised:

1. The city centre as currently defined is compact, vibrant and functions well based on cultural, social and commercial diversity and accessibility. Retaining the current boundary would enable enhancement of facilities and concentrate development in a well-defined area.
2. National policy and guidance promotes a town centre first approach, placing a strong focus on ensuring the vitality of centres, including the intensification of existing town centre sites. Maintaining the existing boundary encourages this.
3. City centres should remain compact, avoiding sprawl and the extension of urban boundaries. Compact city centres are more pedestrian and cycling friendly – e.g. Nottingham, and European cities such as Budapest. A concentrated city centre is likely to focus transport requirements and limit carbon emissions, expansion encourages car based development.
4. All areas of the city centre need to be easily accessible by public transport to serve the wider Norwich area. Some areas of the city centre are poorly served by public transport: St Benedict's Street (regular bus route at Westwick Street needed); Colegate, St Mary's Works and Oak Street medical practice (bus stop on Duke Street needed); and King Street, (bus route on Rouen Road needed).
5. There are numerous sites within the city centre that could be redeveloped to provide a more diverse mix of land uses. Retention of the current boundary will encourage growth, regeneration, the effective use of brownfield land and reduce the amount of neglected areas, including Anglia Square, with more efficient use of space.
6. Expanding the centre risks spoiling the approaches and its unique setting and character.
7. Retaining the existing boundary would ensure no implications for CCGs and boundary areas that may affect health commissioning across the area.
8. Existing boundaries broadly reflect the historical and social bounds of the core, are logical, benefit tourism and retain identity.

9. The current area is the key retail and business area in the city and encompasses all the major heritage and cultural assets of the city. The present area also directly correlates to the existing Norwich BID boundary and is a logical city centre definition.
10. This is an artificial construct and extending it would allow development that is not in the 'real' centre being classified as central, leading to dilution, and possibly further atrophy, of the actual centre. Currently there is a trend for less city centre retail and commercial use, (e.g. office blocks being converted to flats and more on line retail sales). There is significant retail space available in existing shopping areas, and recent closures of several stores in the St Stephen's Street area, in Castle Mall and on London Street indicate that it is not lack of suitable premises which might hold back expansion. To protect the vibrancy of the city centre, it would not be advisable to extend it.
11. City centre should renew to encourage footfall and discourage of out of city facilities.

Support for an extended boundary

Those supporting expansion included *UEA Students' Union, Climate Hope Action in Norfolk and Bramerton, Burston and Shimpling, Cringleford and Poringland* parish councils.

1. Extend to allow for greater flexibility and intensification and refurbishment of suburban areas. Extension would prevent further suburban sprawl, maximise the use of brownfield sites and concentrate development within the existing urban / economic centre.
2. It could be beneficial to have jobs in other areas and other options for local retail etc. especially if the city is to grow as a whole.
3. Planning policies should encourage development as close as possible to what is left of a "city centre" rather than further expansion of the edge of city.
4. The current footprint of the city centre was delineated when the city was much smaller in population, with the city centre footprint roughly following the medieval city limit. The city never enjoyed expansion of the urban core at higher density levels such as took place in cities which grew rapidly in the 18th and 19th centuries such as Edinburgh, Glasgow and Bristol. On the basis of a 'gap' analysis neither the size of the centre nor the scale of facilities are commensurate with other cities of a population of around 220,000. The city centre should be enabled to expand however on a planned basis ensuring that a high level of urban design is embedded, provision of additional civic facilities and the correct balance of mix of uses. Heights and densities should be controlled such that new urban areas that emerge are complementary to and do not overbear the historic core of the city.
5. Given that development connected to the city centre is less carbon intensive and less destructive of biodiversity in the countryside, CHAIN would support enlarging the city centre. This has the added advantage of allowing protection of the heritage sites and character of the existing centre. Enlargement must however be supported with high quality and low carbon public transport to support access to the city centre from an enlarged housing hinterland.
6. Extension suitable if it allows a better defined 'edge' to the city where sustainable transport links and services can be extended and the centre remains walkable.
7. The city should be extended to cover the Deal Ground and Carrow Works. Carrow Works should become part of city centre housing and employment area, though extensive decontamination and capping of wells will be required. The Deal Ground is already in the plans for development and should be moved on with expediency.

8. The current city centre definition leads to a density of development which, particularly on weekends, is out of line with the availability of transport.

No clear view given

A number of agents did not respond to the question, but stated that they reserved the right to comment on the matter at a later stage if necessary (*Lanpro Services Ltd, Pigeon Investment Management Ltd, Otley Properties, John Long Planning*).

Related points raised

1. Greater Norwich should be a single unitary authority within the A47/NDR.
2. Riverside is not city-centre in spirit and should never have been allowed.
3. Potential for city centre to Thorpe rail link.
4. Another “halo” could be attached which is suitable for gradual development out to the ring road all the way round the city.
5. It is too late for preservation of the “city centre”. The business parks and retail parks on the edge of the city have already destroyed the city centre business and retail sectors.
6. It should be recognised the role the UEA and wider NRP can play in the wider growth of the city centre. Both the UEA and NRP hold significant value in terms of supporting the local economy and hold noteworthy potential in helping to facilitate growth in Greater Norwich. (*UEA Estates and Buildings represented by Bidwells*).

Question 15

Do you support the approach to strategic planning for the city centre in paragraph 4.80 of the document?

Many more respondents supported the proposed approach to strategic planning for the city centre (53) than opposed it (9). A number of respondents, both in broad support of and opposed to the proposed approach, suggested amendments to the proposed objectives or a change in their focus. One respondent questioned the need for planning strategically for the city centre and another questioned whether a town centres first approach should be taken for employment uses.

Summaries of specific comments

Yes

Organisations supporting the proposed approach included *Natural England, Norfolk Wildlife Trust, New Anglia LEP, CPRE, Norwich Business Improvement District*, agents representing *Riverside* and *(Intu) Chapelfield, Norwich Green Party* and the *Liberal Democrat City Council Group*. Town and Parish councils in support were *Bramerton, Brundall, Burston and Shimpling, Cringleford, Hainford, Hellesdon, Kimberley and Carleton Forehoe, Poringland, Tivetshall, Thorpe St Andrew, Salhouse* and *Wroxham*.

The proposed approach:

1. Recognises the importance of the city centre to the economy of Greater Norwich;
2. Had support as a “reasonable” approach to planning with partners to retain the long term vitality and vibrancy of the centre, providing an opportunity for high density development in the most accessible location in the county, reducing the need for growth elsewhere.
3. Provides a good balance between innovation and preservation;
4. Promotes for further mixed use, retail, leisure, residential, cultural, employment and tourism development as well as encouraging the enhancement of the night – time economy;
5. Favouring commercial and mixed use development in the centre can be justified on the basis of the relative availability of unbuilt out and permissioned land on the city fringes;
6. Provides a framework for allocating sites e.g. *Riverside* is suitable for further mixed use development including retail, leisure, hotels, offices and residential and *Chapelfield* for retail, leisure, commercial and residential uses.

Suggested amendments

A number of respondents express broad support for the proposed approach, but also suggested amendments which should:

1. Provide a vision for the city centre which creates a greener city that is more friendly for pedestrians and cyclists to commute to and move around in, and one which is well connected, for example to the *Wensum* and *Yare* river corridors, both for recreation and biodiversity and includes reference to a *Biodiversity Strategy* for the *River Wensum* in *Norwich*. The inclusion of suitable accessible *GI* is essential to successful sustainable development in the city centre. In addition to delivering biodiversity benefits, *GI* will help deliver economic and societal benefits, such as

making the centre more attractive to work in and to visit, reducing air pollution, help provide climate change adaptation, and improve the fitness and wellbeing of people. The city centre policy should identify how GI, including green roofs, can be delivered alongside retail, leisure and commercial development to benefit the economy, residents, workers and biodiversity;

2. Include a bespoke “retail strategy” that is integral to the overall vision;
3. Require development to reprove commercial space in mixed use developments;
4. Underpin equity of opportunity in a county with very poor social mobility outcomes;
5. Ensure vacant properties, including commercial (not office) properties, are made available for housing;
6. Look for an exemption of the presumed change of use from offices to residential on the same basis as was achieved by The Royal Borough of Kensington and Chelsea – and which has maintained the diversity and mixed use nature of that London borough.
7. Promote a more integrated public transport system which could include the combination of a bus and railway station and a rail link to Thorpe. Electrification of public transport should be considered as a strategic goal for the city centre, in alignment with current Government targets on emissions reduction and air quality;
8. Ensure that the best method of accessing jobs in the city centre is by walking, cycling and public transport, and this should always be given priority over strategies that might tend to increase car use.
9. Provide definite proposals which will return to the dynamic mix between business, retail and housing;
10. Not focus on further retail expansion as Norwich has a vibrant and diverse retailing including two large shopping centres and has been consistently ranked as one of the top ten shopping locations in the UK for the last few years. With internet shopping on the rise, despite a lower than average vacancy rate for retail premises, these should be filled rather than new units added. There are better options available e.g. conference/concert venues, maintaining the character of retail areas supported by destination tourism and leisure attractions, and maintaining a good level of public open space.
11. Increase the city centre’s residential population without building excessively tall new buildings, but instead by promoting the conversion of vacant upper floor retail and office space and taking opportunities at empty sites to provide low to medium-rise city centre living that reflects the existing character of Norwich.
12. Retain the residential diversity of the city centre which helps to create its character;
13. Have an objective on resilience to social, environmental and economic shocks covering the different aspects of a resilient city, including efficient use of resources, community building, a diverse local economy, emergency planning and food supply.
14. Have meaningful references to the real changes happening to the retail and office sectors, with changing work demands and needs;
15. Reference the cultural visitor economy;
16. Have a focus on brownfield sites;
17. Ensure that the overall health and wellbeing of the city population is, wherever possible, improved.
18. Consider how a ‘premises ladder’ can be provided to support businesses at each stage of business foundation through early stage growth towards maturity. Pricing is

critical in supporting early stage businesses as well as easy in/out terms. This may need to be supported via local authority guarantees, grant or access to long term funding at competitive rates.

19. Significantly speed up pace of development in the city centre.

No

Climate Hope Action in Norfolk, Framingham Earl Parish Council and a number of individuals opposed the proposed approach on the basis that:

1. Cities evolve based on what the people want - they are not planned;
2. Planning for "a green, walkable, cycle friendly centre" should be the start of the vision, with all other aims following from that;
3. The approach is too car orientated. There are too many cars and too much car parking in the city centre. Half the public car parks should be closed and businesses should be encouraged to reduce and eliminate their car parks. All new city-centre housing should be car-free and parking restrictions should be enforced;
4. There is a need to address environmental issues, especially noise, so that people want to live in and around the city centre. One way would be compulsory purchase of all night clubs for conversion to flats. Similarly, the uses need to be more nuanced. We have far too many nightclubs in Norwich, making Prince of Wales Road and Riverside no-go areas for non-clubbers on Friday and Saturday nights, yet they are supposedly key parts of the city's pedestrian network; so much for joined-up thinking!
5. The text is trying to be all things to all men, and is little more than a collection of homilies. More direction and more focussed effort is needed;
6. A strategic vision should embrace a regional approach first and foremost, rather than a bottom up plan as suggested;
7. Enhancing the retail offer flies in the face of the rapid increases in online shopping;
8. Specific issues should be addressed within the city centre, to include but not limited to:
 - green infrastructure
 - feasibility for a car-free city centre
 - continued improvements to cycle ways, including an entirely "joined up" approach
 - improved disabled access
 - climate adaptation and mitigation measures, many of which have added public health co-benefits, including addressing issues such as obesity and air quality and reduced urban "heat-island" effects;
9. Modern work practices mean there is less and less need for large capacity office space within city centres. Better to develop periphery business parks, providing better public transport, as in the case of the Broadland [Business] Park, which has easy access to the southern bypass, for those workers who do not live within the city with access to the bus network to the park.

No clear view given

A number of agents did not respond to the question, but stated that they reserved the right to comment on the matter at a later stage if necessary (*Pigeon Investment Management*

Ltd, Otley Properties and John Long Planning).

Related points raised

1. It should be recognised the role the UEA and wider NRP can play in the wider growth of the city centre. Both the UEA and NRP hold significant value in terms of supporting the local economy and hold noteworthy potential in helping to facilitate growth in Greater Norwich.
(UEA Estates and Buildings represented by Bidwells)
2. This would also bring a greater need for increase with public transport and hopefully investment in the Rail Link between Norwich and Thorpe St Andrew.

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Question 16

What should the plan do to reduce office losses and promote new office development in the city centre?

There were a total of 60 responses to this question.

Summaries of specific comments

Suggestions made included:

Find ways of making office buildings less attractive for residential conversion.

1. [The plan] needs to find a way to make permitted development sites (which are often converted into substandard residential accommodation) less appealing to developers, but as that is unlikely local planning policies will need to be amended to support new office development. This might not be possible to resolve through the plan alone.
2. Several respondents felt the solution was to stop granting change of use from commercial to residential (sic)¹ in favour of office redevelopment. If office space was poor quality it should be replaced by better quality space, which would maintain the supply whilst still allowing redevelopment of poor space. There was also considerable scope highlighted for dated stock to be upgraded and made fit for purpose.
3. Loss of office space was an issue affecting most towns and cities – the GNLP would benefit from contacting those cities that have managed to turn around such a decline and seeing if they will share their business methods. It was also important to maintain contact with major employers who were shedding staff and mothballing or disposing of surplus space, such as Aviva.

Encourage residential conversion/redevelopment of obsolete stock to increase city centre population.

4. In direct contrast with the previous views, one respondent felt that the conversion of old offices into flats would increase the residential working population, raise commercial property prices and so encourage new investment.
5. There should be a block on any new student accommodation.
6. Redevelopment of redundant and hard to let office buildings for housing was supported as this would reduce the need for rural land “at a stroke” and give people modern property right in the heart of the city. This would rejuvenate it, bring in revenue and change the demographic, bringing in new ideas and innovations.

¹ It should be noted that the majority of such schemes were undertaken as permitted development – since 2013 most office to residential conversions do not need any planning permission from the local authority. This followed the Government’s extension of permitted development rights to remove planning controls on a number of change of use types of development and. The only means of reintroducing those controls would be through a local exemption by means of an Article 4 planning direction.

Identify new opportunities and develop initiatives to provide for flexible modern office requirements.

7. The need to renew outdated office and living facilities was highlighted – many respondents supported mixed residential and office development, multi-use buildings and hubs, alongside low cost rental space and smaller shared workspaces to attract young entrepreneurs who live in the centre. Need to work closely with providers and developers to identify development opportunities to redevelop/adapt offices to suit flexible business needs.
8. Key aspects are transport links, parking, light bright free open spaces for business to configure to suit their needs. One suggestion was that any new office developments should have the ability to be converted easily to residential apartments if demand for office space declines. The reference in 4.89 to current policy requiring “office provision in all developments” was supported by some respondents as a sensible option but the truth of that statement was questioned.²
9. There was widespread recognition that most office stock dating from the 1950s and 60s and standing empty was no longer fit for purpose and the days of big office blocks are over, hastened by agile working and promotion of business parks. Whilst residential conversion was appropriate in many cases, there was a strong case for upgrading some buildings to current commercial requirements and thus promote new city-centre office employment without new build always being necessary. *The Broads Authority* said there seemed to be no explicit recognition of the potential of empty office space.
10. *Norwich Business Improvement District* make an argument for coordinated [commercially driven] upgrading of old fashioned workspace as a means of retaining city centre business, promoting the town centres first policy by ensuring there was a minimum required level of city centre office space and meeting the challenges of planning deregulation. The City and County Councils had already taken a lead by upgrading their own office space to suit modern requirements.
11. On a similar theme, *The Norwich Green Party* felt that much office space was not fit for purpose as demonstrated by the large amount of vacant space, but considered that resisting the conversion of this space for residential and other purposes was futile. This did not mean that new high quality office space meeting the needs of modern work patterns should not be promoted. Sites within the main office zones of the city should continue to be allocated with office provision in mind, but recognising that the types of business in Norwich’s growth sectors will not be motivated by large open plan floorspace at low cost, but by appropriately sized units for their particular business with good accessibility to lunchtime retail and leisure offers.
12. *The Norwich Liberal Democrats* felt that the city council might proactively invest in office space and let it out to business, as has already been done with parts of City Hall: working with NUA and BID the council should show leadership through facilitating office lets forming important clusters around knowledge intensive businesses in the digital creative and cult sector prioritised for growth.

² The policy approach set out in the adopted Norwich DM policies plan policy DM19 only requires this in a defined priority area and only on sites above 0.25 hectare.

13. *NHS Norfolk* favoured the reuse of existing buildings where high specification office space is achievable. Flexible and accessible office space is encouraged to support service integrations and flexible working styles.
14. *Climate Hope Action in Norfolk* asked for consideration to be given to actively promoting a sustainable development hub within the city centre focusing on and networking these businesses. This would be supported by development of a low carbon public transport (i.e. electric buses and /or tram system) and increased pedestrian only zones, which would also promote a more pleasing environment and better air quality in the city centre, which may attract development.

Ensure flexibility and responsiveness in planning for changing needs.

15. The *New Anglia LEP* emphasised the importance of responsiveness to future changes in demand - the plan must be “agile” and think about the best way to support the high-value knowledge sectors identified as wanting to locate in the city centre. As the evidence suggests these sectors want affordable and flexible start-up and growth space in high quality offices, clustered close to other similar businesses, it seems logical that the Plan should allow for these types of city centre office spaces and that the evidence should lead the decision regarding what size and where this space is needed. Whatever approach is decided upon, it is important that the Plan remains flexible to ensure the right offices are built in the right places and that they facilitate the wants and needs of businesses, whatever their size and growth ambition.
16. Need for imaginative financial incentives to encourage smaller scale new start enterprises in the creative media and to greater scope existing for growth in knowledge based industries in the centre. The *University of East Anglia* favoured support for development of start-up businesses and enterprise. This could include a very [well]-defined link with the Enterprise Centre at UEA and the work taking place at the NRP.

Restrain car-oriented office development in unsustainable locations.

17. Broadland Business Park cited as an example: out of town business parks were seen as causing harm to Norwich by taking jobs from the city centre. They add to road congestion, while the businesses using them pay lower rent than for inner city sites.

Ensure good transport links and parking.

18. The plan should “be careful” about transport links with city centre office accommodation. This may include bus, train and pedestrian access but for some businesses it is essential to have good parking facilities and good access to the road network. That is why business parks have become popular.
19. Ensure swift transport corridors for those who chose to travel. Revisit the possibility of reviving the Norwich City rail route using tram technology linking it through the City to the Norwich Victoria site [i.e. Marsh Insurance] and then away to the City's south eastern suburbs and possibly further afield e.g. Poringland, Wymondham and Long Stratton.
20. Better public transport links should be provided into Norwich from outlying towns and villages.
21. Ease of parking was a common theme. Office space traditionally requires parking - traffic and parking restraint in the city centre and easier and cheaper parking and lower rents on edge of city business parks has resulted in the loss of 42,000m² of city centre office space. There is a dynamic between business, retail, housing and leisure

in any town and city centre and the impact on the high street from out of town supermarkets is being repeated by office relocation to edge of city business parks. If the trend is to be reversed more imaginative proposals should be considered on alternative transport solutions and/or ways in which the parking and rental situations can be made more attractive.

22. One respondent felt it should be easier to access the city centre rather than closing it off making it impossible (sic) to drive around. Another highlighted the need to “sort out traffic and parking” cited as a reason why everyone has gone to Broadland [Business Park].
23. *Rail Future East Anglia* supported the expansion of office space in the centre, referring in particular to the ease of walking from Norwich station, the availability of good public transport links and the scope for making the city more accessible by rail through provision of more frequent services and potentially new stations (for example at Long Stratton). This would also permit improvements to commuting from towns outside the GNLP area, particularly Thetford Attleborough, Lowestoft, Great Yarmouth, North Walsham and potentially Dereham.
24. *Tivetshall Parish Council* argued for more underground parking, more attractive and frequent Park and Ride services and more electric car charging points.

Approach issue in conjunction with a vision to keep the city centre vibrant: prioritise development in specific areas.

25. Support for the suggested city centre policy which would facilitate office protection – ideas set out in paragraph 4.88 for both Grade A and start-up/grow on facilities were also supported by several.
26. Many felt the areas already targeted in the JCS were still appropriate for offices to be targeted – particular priorities being Anglia Square, Barrack Street and St Stephens. Particular support was expressed for “getting moving” on Anglia Square as the greatest development opportunity in the City. Redevelopment of the Anglia Square site would be a good starting point - the area should/ could be redeveloped sympathetically to provide an attractive area within the city.
27. The Britvic site was also mentioned as an opportunity site which might also offer a better location for the Food Enterprise Zone.
28. *The Norwich Green Party* supported the identification of cluster zones for office-based businesses within the city centre (in much the same way as retail frontages are identified in the current local plan), to ensure that any land that becomes available in those areas develops to enhance the offer for both existing and new businesses. St Georges Street was suggested as a potential creative industries office cluster. Barrack Street and Whitefriars should be designated an office zone but required better infrastructure such as good bus links and supporting services to be able to attract business.
29. *The Norwich Liberal Democrats* felt that a vibrant city centre was crucial in supporting business and resisting the loss of offices.

Ensure a supply of cheaper accommodation.

30. Keeping rent and rates low plays a large part in attracting new business (an issue mentioned by several) with one respondent considering a complete review of the business rates system was necessary.
31. Need to decrease rents, council tax, increase subsidies.

Strong commercial promotion of the city centre needed.

32. *Norwich Business Improvement District (NBID)* - plan should ensure the commercial promotion of Norwich as a business destination is a key output and a commitment from LA partners to input and ensure this is delivered, though the process is owned and driven by the commercial business community.

Nothing that the plan can do – loss of city centre office space is inevitable due to systemic change in working practices.

33. Many thought the plan could do nothing to address this issue because office floorspace loss was a natural consequence of supply and demand. Loss of office floorspace was inevitable – planners should recognise this. [A protectionist strategy] fails to take account of changes in office practices, the pressure for leaner and more efficient business models. The trend towards the establishment of large scale offices is going 'against the grain' of developments in commerce. The fear of automation is not in the manufacturing sector but in the office functions of large organisations which are becoming increasingly centralised and automated. The loss of 8% of our office accommodation reinforces this view. Office accommodation should not be thought of as large scale as per Norwich Union, but as small scale, highly automated, secure and accessible readily by bus or rail.

Other comments

34. *Poringland Parish Council* considered that the future lay in small units with significant automation and it was difficult to lessen office losses due to restrictions in access.
35. Others expressed doubts about the importance of retaining office space or the validity of the claim that there was a shortage. *Hellesdon Parish Council* referred to the number of office blocks being converted to housing as evidence of an over-supply. *Thorpe St Andrew Town Council* echoed that view, stating that there was no point in planning to reduce office losses and new office development, rather the priority should be to repurpose existing office space for residential use as allowed for in national policy, *Kimberley and Carleton Forehoe Parish Council* felt that there was no need for new offices and to promote office development is hanging onto the past. People will be working from home in different industries. Redundant office blocks should be made into housing, retail or restaurants in the city centre. The future will lie in promotion of the creative industries through education – everything else will be mechanised.
36. Growth in the area as a whole did not necessarily require city centre offices to be retained: those that remained were “of their time” and not as desirable as might be wished; there appeared to be a significant amount of office space to let and the problem was said to lie with “greedy landlords” wanting too much rent: the solution was either offer space at lower rents or consider converting empty shops if the offices were genuinely unlettable.
37. *Framingham Earl Parish Council* pointed to a trend toward downsizing and hot desking which meant that working practices were moving away from the traditional big offices with large staff. Better to develop periphery business parks, providing better public transport, as in the case of the Broadland Business Park, which has easy access to the southern bypass for those workers who do not live within the city with access to the bus network to the park.

38. A number of agents did not respond to the question, but stated that they reserved the right to comment on the matter at a later stage if necessary (*Pigeon Investment Management Ltd, Otley Properties and John Long Planning*).

DRAFT

Question 17

What should the plan do to promote retailing in the city centre?

There were a total of 60 responses to this question.

Summaries of specific comments

Suggestions made included:

Ensure comfort and accessibility for shoppers; enhance the public realm.

1. Clean and well-lit streets were considered important.
2. *Bramerton Parish Council* argued for “pleasant places” between retail centres, pedestrian routes, pavement cafes and additional tree planting. Castle Mall and Chapelfield were cited as good examples of inviting, accessible centres.
3. Concern about recent moves making facilities like the walk-in health centre less accessible than before³: planned growth would put more pressure on these facilities. Need for the centre to be made more attractive and accessible to increase footfall.

Increase the residential population in the city centre.

4. City living apartments should be encouraged.
5. *CPRE Norfolk* felt that a concentration of housing in and around the city of Norwich including converting space above shops into residential use would give a boost to retailing in the city centre. Dispersal, in combination with the further development of out of town shopping centres, would harm the prospects of city centre retailers. With appropriate varied residential developments in and around the city centre the existing rich and varied retail offerings can be maintained and enhanced.

Recognise and support local independent and speciality retailing as well as (or instead of) national chains.

The important role of local independent retailers and small businesses was a common theme mentioned by many.

6. *Wroxham* and *Cringleford* Parish Councils both supported the promotion of character shopping areas such as The Lanes in preference to national high street chain stores. This view was widespread, with a requests for additional support to the small businesses in the city centre that make Norwich “different” and “the special place it is”. Rent caps for Norwich Market stallholders were suggested.
7. Local independent retailers and independent department stores contribute greatly to Norwich’s distinctive retail offer for residents and visitors: recent high profile closures of national operators mean that the plan should avoid reliance on these.
8. Some felt that the Lanes had gone into a decline and had almost “closed down” compared with the thriving area it was a few years ago: vacancy levels had increased. With a bit more imagination and change in policy and support, this trend could be reversed, “we don’t just want chain stores which you can find anywhere”.
9. Another suggestion was to accommodate small independent traders and start-ups in subdivided larger units vacated by larger concerns and national chains.

³ This was in reference to the removal of the NHS Walk-In centre from a unit in Castle Mall to a site at Rouen Road considered to be less accessible for the majority of users.

10. Local speciality retailing should be allowed to emerge on a “place” basis as has occurred in the Lanes and Magdalen Street.

Provision of low cost accommodation and reduced rates/rents for small businesses.

11. Need to ensure that the level of business rates is not a burden on retailers, some arguing for rent and rate subsidies for shops over cafés and restaurants, others for lowering business rates across the board and potentially a fundamental review of the system [although the plan itself could not influence this].
12. The use of vacant retail units for leisure, education and health purposes should be encouraged, alongside the intensification of uses and multi-use hubs to provide low cost rental space. Need to that people can rent smaller spaces more cheaply for start-up business and that there is a variety of size options if possible, with favourable rates for smaller independent retailers. Excessive rents from “greedy landlords” were seen as responsible for making the centre unaffordable.
13. Norwich City Council (through their property advisors NPS) should offer discounted rents to start-ups in empty units.

Improve Norwich Provision Market.

14. The market was considered to need improvement: “too dark and bewildering”. Should open up the centre [of the market] to let in more light, with provision of bins and seating and tables, need to draw in more people who can spend more time in the market. There was also a suggestion of a Christmas market to attract shoppers to use other facilities.

Retail focus vs. diversification.

There were contrasting views on this issue.

Comments in favour of prioritising retail

15. One respondent felt that there were an “overwhelming number” of cafés and restaurants in the city centre and the rate of business failure was increasing in that sector, consequently an argument could be made for some tightening of planning controls on changes of use from retail⁴ as well as preferential business rates/rents for retailers.
16. Concentration of retail into one part of the centre was another option – the distribution of shopping at present was considered to be scattered and disjointed.
17. General concern at the overprovision of non-retail services. “Make sure it is retail that opens and not - as in some places - what can only be called amusement arcades”.
18. Limits are required on the number of food outlets in the city centre. A good balance is critically important albeit that there have been a number of recent high profile restaurant/ café/ pub closures within the city. Query whether the plan could specify ratio of retail floorspace/ food outlets within the city.⁵
19. There appeared to be an implicit acceptance of continued retail decline: Norwich’s retail ranking having slipped from a peak of 9th in 2011/12 to 13th currently – it was

⁴ Many such changes of use can be carried out under national permitted development rights without the need for planning permission: achieving this would require additional local controls under an Article 4 direction. The GVA Employment, Town Centres and Retail Study recommends the selective use of such directions

⁵ Not usually practical without local restrictions to limit normal permitted development rights on change of use, see above.

noted that the relevant JCS monitoring indicator was now to maintain the city in the top 20 national retail centres rather than the top 10. A vibrant retail sector relies on a synergy with business and catering services - circa 2,000 fewer people based in city offices (consequent on the loss of 42,000 sq.m of office space) - this will have had a major impact on retail and restaurants.

20. *Kimberley and Carleton Forehoe Parish Council* commented that retail provision should meet a range of “high and low end” needs – exceptional customer experience required coupled with budget and day to day shopping people could walk to.

Comments in favour of further diversification

21. Many respondents felt that further diversification was inevitable with the continuing move away from high street retail: a reduced emphasis on shopping and additional leisure uses would need to be planned for flexibly.
22. *Indigo Planning* were in favour of diversification of uses on sites such as the Riverside Leisure centre; emerging retail policies should be flexible enough to accommodate for changes in the retail and leisure sectors. A mixed and flexible range of uses should be encouraged.
23. *InfraRed* (operators of Castle Mall) argued for a more flexible generic policy for the city centre sitting within the GNLP rather than the present detailed threshold policy for primary frontages [in the adopted Norwich DM Policies Local Plan]. Such a policy could seek to maintain the predominance of A1 retail within primary frontages but allow for non-A1 uses including A3, A4 and D2 which can add to the vitality and viability of the city centre. In this context *InfraRed* also argued specifically for the removal of controls on Level 2 of Castle Mall to allow its repositioning as a leisure destination.

Provide for the expansion/Intensification of city centre shopping

24. Support was expressed from one respondent for the intensification of uses and multi-use hubs. The impacts of expanding retail should be carefully considered – extending the city centre with new floorspace provision might be one solution but this might lead to under-occupation elsewhere.
25. *Indigo Planning* were in favour of expanding the centre by allocating sites for new retail uses.
26. Conversely, there was some scepticism about the need for any more “soulless malls” like Castle Mall and Chapelfield.

Acknowledge the core role of retailing and coordinate the marketing of the city centre.

27. *Norwich Business Improvement District* asked that the plan should support retailing as one of the core economic functions for Norwich and the region and have this included in LEP- funded activity and support. The value to the city needs to be recognised and supported through economic development functions within the LAs and funding made available for coordinated marketing.

Consider the impacts of traffic management.

28. Many felt that the recent changes to the city centre transport network were harmful, mentioning the “incessant roadworks”. Queuing and bottlenecks, traffic

entering via Ipswich Road, the area around City Hall and Riverside cited as particular problem areas.

29. Traffic congestion and lack of parking destroys city centre retailing, traffic ought to be able to move freely and whilst public transport and cycling provision is necessary not all visitors to the city could reach it by public transport.
30. Current city roads planning “rides roughshod” over local views and results in congestion, wasted money and dangerous solutions for cyclists such as the path/cycle lanes we see on Newmarket Road. When it comes to roads planning in Norwich there seems to be an arrogant ‘we know best approach’. Recognition needed that the city will need to remain accessible to shoppers from the remoter parts of its hinterland whose only means of transport is the car.

Improve sustainable transport.

31. In contrast, a common theme was that to plan effectively for shopping, better and cheaper public transport and more opportunities for walking and cycling were necessary, including cheaper travel and better Park and Ride facilities.
32. *UEA Students Union* was among those highlighting the reliance of retail business in the area on visitors beyond the Greater Norwich area – the majority of whom arrived by car. This could be combated by supporting development of better public transport networks to surrounding areas.
33. One respondent said that the Park and Ride system was now “ridiculously expensive” – [it] should go back to the pay by car system - and parking in the city is inadequate. Cambridge was quoted as a location where park and ride facilities were cheap/free. Constraining the bus pass service to older consumers will impact footfall in the City significantly. Younger families would queue for car parking rather than use the bus which they regard as a last resort. Walking or cycling is only possible within the city boundary and is confined to a small group of young environmentally conscious individuals or those with 'economic issues' “i.e. the poor”.
34. *Tivetshall Parish Council* felt that city centre parking and the distance across city centre retail areas were still too far for many people to walk, accordingly an inner city ride service should be considered.

Improve parking availability and tariffs.

The need for cheaper, more plentiful and more accessible parking was a common theme.

35. Rising parking charges impact upon Park and Ride and the desire of people to face a centre likely to become congested as fringes and outlying populations expand. Need to provide better parking for those travelling from distance who are currently more likely to use outlying centres than attempt to access the city.
36. Parking within reach of the centre is becoming next to impossible and whilst the park and ride has improved over the past decade or so, many shops are not within easy range of the bus station on foot.

Restriction on out of town developments.

37. A number of respondents called for restrictions or an embargo on edge of town retailing – particularly important with the completion of the NDR.
38. Demand for retail floorspace was considered to be in decline with the growth of online platforms [so did not justify any further out of town space].

39. There was a need to maintain high occupation of existing retail areas rather than open up new areas leaving all under-occupied; retailers should be encouraged to occupy underused retail warehouse space at e.g. the Cathedral Retail Park before considering out of town locations such as Longwater.
40. *CPRE Norfolk* considered dispersal, in combination with the further development of out of town shopping centres, would harm the prospects of city centre retailers. Need to monitor and resist the impact of edge of urban area retail developments and restrict further growth in these areas if necessary. Broadland and South Norfolk should play their part if they are to be true partners in the plan.

Enhance, support and develop district and secondary shopping centres.

41. One respondent argued that the 11,000 sq.m of comparison retail floorspace required in the Norwich urban area by 2027 could be focused on district and secondary shopping areas; any growth within the city centre being accommodated through windfall and small allocations or the intensification of existing retail uses. This would ensure a compact and competitive city centre with low vacancy rates but would also help to increase the vibrancy of district centres, limit traffic growth in the city centre and promote walking and cycling to use local shopping rather than relying on car journeys to the city centre.
42. Another favoured complementary promotion of district and local provision alongside city centre retail on a street based urbanism basis providing new “local high streets” to service the growth areas.

Plan needs to be responsive to a changing retail landscape and national economic trends.

43. The plan must accept that there are many changes taking place to the 'High Street' including online shopping. The success of retailing will be reflected by the success of the economy. Important not to overextend retail with the prospect of Brexit. Developments in tourism and local economic growth may make it possible to promote small scale retail outlets. Town centres by necessity need to become mixed commercial, retail and residential. Retailing in shops will continue to decline and this should be factored in.

Acknowledge the importance of sustainable retailing.

44. *Climate Hope Action in Norfolk* felt that Greater Norwich could be positioned a leader in sustainable community development with active promotion of sustainable retailing, specialist outlets, including small scale local businesses (which promote local employment), larger farmers markets etc. [This may be relevant to a number of other identified issues raised against this question]

Nothing that the plan can do.

45. A small number of respondents considered that the plan had no role and supply and demand would deliver what was required, the plan merely delivering the necessary infrastructure to support it.

Other comments

46. Provision of lockers/drop off points at Park and Ride sites for purchased items.
47. *NHS Norwich CCG* identified a need for ecologically friendly buildings and reduction of CO₂ emissions in order to combat health problems – this comment was also made against a number of other questions.

48. *Framingham Earl Parish Council* suggested a survey of city centre shoppers to find out what they would like to see in the centre.
49. A number of agents did not respond to the question, but stated that they reserved the right to comment on the matter at a later stage if necessary (*Pigeon Investment Management Ltd, Otley Properties and John Long Planning*).

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Question 18

Should the focus for late night activities remain at Riverside, Prince of Wales Road and Tombland or should a more flexible approach be taken? [Yes/No]

*Note: It should be noted that as phrased, Question 18 doesn't invite a Yes/No response because it is a choice between two alternative options – the inclusion of Yes/No options on the online response form was the result of a proofing error. Our intention was that a **Yes** response meant support for the existing approach and **No** meant changing it, but in fact the majority of those responding **No** were in fact opposing the further spread of late night uses or even arguing for a reduction, rather than seeking more flexibility. The analysis below takes account of the actual comments made irrespective of the Yes/No response.*

There were a total of 58 responses to this question.

Overview

- 33 respondents supported retaining the existing late night activity zone or argued for even tighter controls – “close down the clubs which are already there”.
- 6 respondents supported more flexibility, with various caveats.
- 10 respondents answered **Yes** with no additional comment made or commented merely to highlight the ambiguity of the question– as noted a Yes response could mean an expression of support for *either* the existing approach *or* a more flexible one
- 4 respondents were undecided or did not wish to comment at this stage.
- 5 respondents made additional points without a clear preference for either option.

Summaries of specific comments

Of those who considered that **late night activities should remain concentrated in the existing designated zone** the following comments were made:

1. This has been a successful approach and there is no need to change it. Concentration in one or two locations is better to control, police and maintain order and enable the use of the Late Night Levy to address problems of mess and litter.
2. Allowing more late night activity in other parts of the centre could damage the vibrant nightlife which is slowly building in those areas.
3. The appearance of Prince of Wales Road needs to be improved and made more welcoming to visitors as the main approach from the train station.
4. Desirable to minimise disruption to residents in the wider community and avoid the unwanted spread of anti-social behaviour: “vomit and violence”.
5. A more flexible approach would spread the problem over a wider area and make it more difficult to control unless backed up by rigorous licence enforcement and withdrawal of licences from venues with a reputation for violence and street fights
6. An argument made for closure of the nightclubs that are already there – Prince of Wales Road would present a more welcoming approach with restaurants and coffee shops in preference to closed nightclubs and discarded rubbish bags.
7. Careful management of additional areas should be considered to avoid unnecessary concentration and allow variety.

8. Promoting further residential development in the city will have a direct conflict with the late night economy for obvious reasons.
9. Sites such as [Riverside] have the capacity to deliver more intensified and mixed uses and meet any future needs.
10. Consideration of the appropriateness of such activities to the Tombland and Prince of Wales areas should be given particularly given the historic setting.
11. *NHS Norwich CCG* favour additional services provided building on the work of the SOS bus and the consideration of 'drunk tanks' to allow over-indulgers to recover in a safe place. Helping reduce the impact from these areas on the acute hospital and other health services.

Of those favouring **a more flexible approach**, the following comments were made:

12. A more flexible, mature approach is required with different parts of the city needing their own nightlife. Concentration leads to more antisocial behaviour, described by one as "a melting pot of crime and disorder".
13. More promotion of early evening and much less late night activity.
14. Generally in favour of flexibility but one must be careful to separate night time leisure from residential.
15. Low quality entertainment areas have not benefitted the city, by day or night. Norwich needs to decide whether it wishes to remain a "binge drinking hotspot", or offer a safer more pleasant entertainment experience. Concentration into key areas has increased the propensity of low quality venues.
16. *UEA Students Union* referred to a large scale change in the approach to the night-time economy due to rising costs for venues (and their customers). Focusing activity in the areas identified often leads to those areas being associated with anti-social behaviour. Other UK cities apply more flexibility and maintain a good balance of safety and variety - Norwich should explore this approach. (Another respondent referred to other cities having more "buzz" in the evening: "think Berlin". Licensing also needs to ensure that venues take proactive measures to support responsible, and discourage irresponsible, drinking. Measures to combat sexual harassment and violence - this is the case in other cities and the night-time economy in Norwich could benefit from its inclusion here.
17. *Norwich Business Improvement District* referred to the existing approach of concentration creating incident "hot spots". It would be worth considering a removal of too restrictive legislation and allow new sites in different areas of the city to remove these. Others responding in a similar vein mentioned the worsening problem having required the introduction of the Cumulative Impact Licensing Policy.
18. Larger clubs and bars should be moved to purpose built industrial estate areas, away from residential dwellings and positive, late businesses that don't contribute to the ASB problem.

General Comments

19. *InfraRed* (operators of Castle Mall) were disappointed that there had been no question in relation to daytime and early-evening leisure activities. They would support the continued location of Castle Mall within the defined Leisure Area, which would assist in supporting the diversification in uses and the encouragement of footfall in the Mall, aiding the vitality and viability of both the Mall and the City Centre more generally. *InfraRed* believes that the rapidly changing context faced by

City Centre retailing generally, and Castle Mall in particular, would justify additional flexibility in terms of the policies that guide, and control, town centre uses in the City Centre.

20. A number of agents did not respond to the question, but stated that they reserved the right to comment on the matter at a later stage if necessary (*Pigeon Investment Management Ltd, Otley Properties and John Long Planning*).
21. Several respondents commented that the inclusion of Yes/No options to respond to this question was inappropriate and/or that the question was poorly phrased. See note at the start of this summary.
22. *Otley Properties and John Long Planning* did not respond to the question, but stated that they reserved the right to comment on the matter at a later stage if necessary.

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Question 19

What should the plan do to promote housing development in the city centre?

A total of 54 responses were received, presenting a diverse range of views.

Summaries of specific comments

Make better use of redundant office and commercial space

1. *Salhouse Parish Council, Cringleford Parish Council, Wroxham Parish Council* and several individual respondents supported the idea of using redundant offices either by demolition or conversion, comments included: convert disused buildings and build medium height apartments; housing should be maximised in the city centre; enforce a time limit for build out to prevent land banking.
2. *Framingham Earl Parish Council* There should be more conversions of the empty upper floors of city buildings for city workers and could be for affordable housing.

Make effective use of brownfield land and ensure realistic allocations

3. *Brundall Parish Council* commented that it would depend on the plan's approach to loss of offices. Sites such as Barrack Street [a long term vacant and stalled site] should be a priority. *Climate Hope Action in Norfolk* suggest launching a competition for low carbon/Passivhaus developments using brownfield sites to help launch the plan.
4. *Indigo Planning* supports housing promotion in the city centre as it has the appropriate infrastructure and amenities. Brownfield use is a key component and the council should encourage intensification of sites in the city centre e.g. development of Riverside Entertainment Centre.
5. *Pigeon Investment Management Ltd* Allocations from the previous JCS should be delivered. It would not be appropriate to allocate additional sites when there have been challenges with the delivery of existing allocations. A significant review should be undertaken of the existing sites as these would have been the more obvious options for development. It should consider site allocations that have existing uses, housing market and challenges of bringing forward mixed use allocations.
6. Stop allocating new sites until existing ones and ones in a concentrated area around Norwich are built out.

Increase opportunities for and supply of affordable housing

7. Include a lot of affordable housing in the new Anglia Square development but limit student accommodation. There is a shortage of social housing in the city.
8. *NHS Norwich CCG* Health partners endorse additional green spaces in the city to improve wellbeing of the population. There should be a mix of affordable and social housing and care should be taken to not create future areas of deprivation.
9. *Poringland Parish Council* Prioritise commuting times and promote social housing.
10. New developments should have a high [proportion] of 1 or 2 bedrooms to represent common living arrangements. There must also be good provision for residents who need support.

Increase densities where appropriate, promote diversity of uses

11. Encourage high quality accommodation at a greater density and be realistic with car parking as no more street parking needed. Look at other cities and start building up more than spread out. Out of town developments add more cars to the roads.
12. *Liberal Democrat City Council Group* Norwich city council should redevelop the housing so it's more intensive – some flats are surrounded by grass on Rouen Road. Compulsory purchase would also help.
13. *Kimberley and Carleton Forehoe Parish Council* Future expansion will come from coffee/bar culture bringing life back to the city. With careful planning, they can be attractive to older generations. Development should include a mix of retail and flats.
14. *Bramerton Parish Council* says the late night zone at Prince of Wales Road should be retained to minimise disturbance [see Question 18]. Also, create a diverse community.
15. Over-densification of sites should be resisted and heights should be contextual to the historic city.

Ensure that the development of homes is coordinated with supporting services

16. Homes should develop at the same rate as business and retail. Factories can be converted to homes but not at the expense of business and retail. If Norwich is to become a car free residential area, this will require careful planning to provide social aspects of parks, smaller shopping facilities, community hubs etc. An alternative to building more houses to reduce prices is to increase social renting to reduce demand on the private sector. This will result in the private sector becoming less attractive for investors. Social housing should be substantial to maintain
17. Housing should be restricted so that it's balanced with maintenance of land for economic/civic uses. Specific housing need should be interrogated (sic).

Other comments

1. *Tivetshall Parish Council* commented on the success of the present approach to attracting housing into the city centre over the past twenty years and felt it should continue.
2. One respondent commented "Let supply and demand deal with it".
3. *Hainford Parish Council* suggests offering incentives to developers.
4. *Thorpe St Andrew Town Council* consider that there is already sufficient housing in the city centre.
5. Limit student accommodation, cap the number of student blocks.
6. *Otley Properties* and *John Long Planning* did not respond to the question, but stated that they reserved the right to comment on the matter at a later stage if necessary.

Question 20

How can the plan best support cultural, visitor and educational uses in the city centre?

A total of 53 responses were received, presenting a diverse range of views, although not all wished to comment in detail.

Summary of specific comments

Exploit potential to develop arts and cultural facilities

(Under this issue, several respondents supported the establishment of a large venue or concert hall).

1. Ensure efficient public transport and encourage city living. A concert hall/conference centre at Anglia Square would be good. However, the population is not yet great enough for a concert hall to be viable. Many major artists miss Norwich due to lack of a suitable venue and the only large one is NCF which isn't covered.
2. Norwich could develop a Botanical Garden; not in the city but perhaps in between Drayton and Hellesdon.
3. Partner up with Tate to create a Tate East centre – though there won't be market interest yet as that's not how these facilities are developed.
4. *The Theatres Trust* comment that Norwich has a good provision of theatre venues so we recommend that the plan supports culture uses in the city by protecting existing venues from unnecessary loss and achieve redevelopment where proposed. This includes protecting negative impacts of surrounding development. We recommend the plans vision refers to cultural well-being.
5. Investment in maintaining key venues such as the Halls and Theatres. The council should support diversification of uses on existing sites and encourage mixed use development.
6. Encourage imaginative conversion of existing facilities to cultural/community use.
7. A big venue would be an asset the Norwich area through increasing tourism and improving facilities.
8. *Thorpe St Andrew Town Council* Make better use of redundant spaces and event hall close to transport links.
9. Sites such as Deal Ground/Utilities/Britvic could support a concert facility. Contemporary gallery space housing art which is currently in the city could be in association with The Sainsbury Gallery, The Tate or V&A should be in the Square development. Medieval heritage should be promoted more as a key attraction and a UNESCO bid could be focused on Castle, Cathedral, medieval churches and pilgrimage route. Boutique hotels should be encouraged and a gap analysis could be conducted against similar sized cities. An additional secondary school could emphasize creative industry, cultural and tech skills.
10. *Kimberley and Carleton Forehoe Parish Council* support art creativity alongside science centres at John Innes. Collaboration between Sainsbury Centre, Norwich Art School and John Innes. Encourage older generation back to city.

11. *Broads Authority* Refer to River Wensum Strategy which has a vision of promoting growth of Norwich. Proposed projects include Hellesdon Mill and Whitlingham Country Park which aim to enhance the area for users and residents.
12. *Climate Hope Action In Norfolk* - Launching Norwich as an innovative centre for sustainable community development will open opportunities with Tyndall Centre, John Innes Centre and environmental faculties at UEA. Engage the Arts College, Norwich Farmshare and Wildlife Trust, vegan community whilst maintaining excellent transport links.
13. *Liberal Democrat City Council Group* Providing the facilities outlined in 4.104 to 4.107 would support the city, in addition to a concert facility and more hotels.
14. *UEA Estates and Buildings* highlight the influence of UEA and NRP as a centre of educational excellence should be factored into the Plan. Development of Congregation Hall would enhance the UEA as a key destination with a premier conference centre.

Better facilities management/promotion

15. Hand The Halls over to a Trust who can realise its commercial potential as the Council doesn't have the funds to manage it properly.
16. The guidebook for Seville, Spain should be used as a blueprint for Norwich as tourist information is fragmented.
17. Increase residential development and cultural demand will follow.
18. *Wroxham Parish Council* supported greater use of Riverside area which is currently squandered.
19. Better signage at arrival points such as park and ride/road junctions. Better city guides.

Improve visitor accommodation

20. Norwich is lacking a backpackers' hostel.
21. *New Anglia LEP* highlighted a need for High end hotel accommodation.
22. *Norwich Business Improvement District* Any plan should factor in a growth trigger so that it becomes an active aspiration rather than an unrealistic opportunity. There should be 4 star and 5 star hotels to facilitate Norwich being a conference destination. This would encourage event producers/promoters to bring larger scale events to Norwich. There should be support from local authorities to ring-fence funding to deliver this PR function. The education sector sees Norwich as an Opportunity Area for social mobility and this should be addressed. Also, high quality, low cost hotels/hostels.

Improve infrastructure and accessibility

23. Infrastructure is the most important factor – there will be no market interest if a venue is inaccessible.
24. Schools should be protected from routing of traffic. Secure a good Sunday train service to London.
25. *Salhouse Parish Council* argue for more park and ride services, late night buses and a tram service.
26. *NHS Norwich CCG* Health partners endorse additional walk/cycle ways to link cultural/educational areas.

Other comments

27. Small multi use facilities are recommended over larger, single use.
28. Need to keep rates and entrance prices down and ensure good parking.
29. There's no point in developing a medium facility when there is no demand and when existing venues will be commercially damaged.
30. "Don't let Weston Homes destroy cultural networks at Anglia Square". Encourage live music and don't let residential determine licensing laws in the city centre.
31. *Poringland Parish Council* highlighted a need to ensure that CIL monies are used to support [these facilities].
32. *Historic England* consider that efforts to enhance vitality of Norwich should be linked to conservation and the historic environment whilst enhancing local character.

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NORWICH URBAN AREA AND FRINGE PARISHES

Question 21

Do you support Option UA1 for the remainder of the urban area and the fringe parishes?

A total of 72 responses were received to this question.

Overview

Many more respondents supported the favoured option of continuing the current approach for planning for the remainder of the urban area and the fringe parishes (60) than opposed to it (6). A number of respondents in broad support suggested some amendments to the proposed issues to be covered, including some requesting a Green Belt. Some of those opposed questioned the effective implementation of the approach up to now. Some questioned the fact that only one option was available, others requested a clarification on issues such as the definition of fringe parishes and the meaning of specific terms such as “area wide traffic constraints” and Norwich being a “Learning City”.

Summaries of specific comments

Yes

Organisations **supporting** the proposed approach included *Barratt David Wilson Homes represented by Pegasus Planning Group, Nigel Hannant represented by Lanpro Services, Natural England, Norfolk Wildlife Trust, New Anglia LEP, Wensum Valley Alliance, Climate Hope Action in Norfolk, CPRE Norfolk, NHS Norwich CCG, Norwich Green Party, UEA and the Liberal Democrat City Council Group*. Town and parish councils and other local bodies in support were *Bramerton, Brundall, Cringleford, Diss and District Neighbourhood Planning Forum, Framingham Earl, Hainford, Hellesdon, Kimberley and Carleton Forehoe, Poringland, Salhouse, Thorpe St Andrew, Weston Longville and Wroxham*.

Support

1. Option UA1 as a good starting point for the urban areas. These locations would deliver sustainable development, by providing housing and affordable housing to meet identified needs, and are accessible by walking, cycling and public transport;
2. Targeting regeneration of the poorest communities;
3. Continuing approach to further development of the green infrastructure network, including protecting the landscape setting of Norwich and the re-establishment of priority habitats (which includes heathland), rather than heathland habitats per se. Accompanying text should make clear that this includes areas of biodiversity. It is important that GI plans are taken down to the local level and we are pleased to see that Broadland District Council are developing a West Broadland GI Project Plan.
4. The long-term expansion and enhancement of the UEA and the NRP in the plan period to 2036 would help to achieve the following aspirations of Option UA1:
 - Regeneration of suburbs to the North, West and East, as the expansion of the UEA and NRP will generally support the wider area;
 - The creation of well-designed developments. Any UEA led development will incorporate the special character of the Campus within its design;
 - Promotion of Norwich as a learning city;

- The retention, improvement, and creation of jobs;
- The retention and enhancement of local services; and
- General transport improvements, through the continued improvement and enhancement of transport serving both the UEA and NRP.

Issues to consider and suggested amendments

5. Many respondents focussed on transport issues, with varied views expressed:
 - a. specific emphasis should be placed on improvements to walking, cycling and bus networks, in particular the long-promised “Rapid Bus Routes” and improvements to cycling and walking networks near the NDR, over the increase of road traffic to reduce current high carbon emissions of private car use dependency;
 - b. rail and light rail should be used to alleviate congestion in the city centre and encourage more sustainable movement;
 - c. the vast majority access the city by car and won't depend on public transport which they see as expensive;
 - d. do not support cycle paths on pavements;
 - e. reduce restrictions upon disabled access which will affect an increasing proportion of the population.
6. These areas are where most of the urban population live and their vitality is essential. Suburban district shopping centres (small shopping parades in the inner and outer suburbs) should be supported and further developed to provide local options for residents in terms of shops, cafes and pubs. New housing developments should always include such facilities.
7. Consideration is required to the impact on health and social care services and infrastructure. The GNLN needs to develop a clear and consistent approach to engagement with health to ensure that health services and infrastructure can be planned in a timely manner, in accordance with anticipated growth;
8. A Green Belt should be added to the favoured option;
9. Include development of the Carrow Road Colman’s site as a ‘Food Hub’, bringing further employment close to the city centre;
10. Regeneration of the suburbs should relate to formation of communities not added housing;
11. No one area should be over-burdened with development;
12. Explicitly recognise proposals for development in the south west of the area in recognition of the potential for growth in this area. A large site at Cringleford (part of GNLN0307) forms a natural extension to the committed development in this area and will assist in support and enhancing that community.

Support with significant reservations

13. Reservations regarding any increase in densities in suburban areas;
14. Support favoured option for the urban areas but not for the parishes – where far too much inappropriate low quality housing on poor flooded farmland has already happened storing up real issues for the future. All large development in these parishes should be reduced to a manageable level for the local community to absorb

- a maximum of 500 homes a year with very careful social planning may be able to be absorbed without long term consequences.
- 15. Because as you have decided to overgrow Norfolk, these areas need attention to provide facilities where people are, not ten miles away. At the moment the logic of your transportation policies are not clear as you singularly ignore the desire of the radial roads to attract the cycle paths etc. to bring people into the heart of the City;
- 16. Keep changing things and nothing gets done.

No

- 17. A number of respondents opposing the favoured option also focussed on transport issues:
 - a. Do not agree with "Transport improvements (including measures associated with completion of the NDR such as area wide traffic restraint and improvements to the walking, cycling and bus networks);
 - b. Recent cycle lanes are poorly designed/implemented and very underutilised.
 - c. Traffic restraint is also making parts of Norwich a nightmare with poor traffic flow and queuing traffic which will lead to poor air quality e.g. Riverside, around City Hall and Ipswich Road;
 - d. More needs to be done to promote park and ride or park and rail options, tied with reduced transport costs. The cost is the key part if it's cheap, easy, clean, reliable and fast more people will use public transport;
 - e. More needs to be done to encourage parking at local train stations and getting the train in. Rail used more like a park and ride system, but this need to be introduced with a carrot not a stick approach. Expand parking at outlying stations. Also add a rail station at Postwick Park and ride and expand site.
 - f. NDR was a waste of money.
- 18. The favoured option is the right approach but actually needs to be implemented;
- 19. The favoured option is far too generic to be meaningful. On the "promotion of Norwich as a learning city", the motto of UEA is "Do different". What about doing different? Be brave!
- 20. The proposal will lead to relentless urban sprawl of Norwich. The city will lose its character as a major but discrete urban centre in its own right which at the same time serves a large and clearly defined rural hinterland.
- 21. Concerns that the density of new developments would compromise the landscape character in fringe parishes. Mention is made of protecting the landscape setting of Norwich and re-establishing heathlands. The favoured option should include protection of the River valleys including the tributaries of the Wensum and Yare, e.g. Rivers Tud, Tas and Tiffey. The designated river valley of the River Tud should include all the land against the boundary of East Hills Woods and the valley right up to the 20m contour line at the bottom of Farmland Road and the maps should be amended to reflect this.
- 22. It's a flawed plan.

No clear view given

- 23. A number of agents did not respond to the question, but stated that they reserved the right to comment on the matter at a later stage if necessary (*Pigeon Investment*

Management Ltd, Otley Properties and John Long Planning). Tivetshall Parish Council did not wish to comment, feeling that option UA1 was “too generic”.

DRAFT

MAIN TOWNS

Question 22

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

A total of 62 responses were received to this question.

Three respondents reserved comment at this stage. A number of respondents (15) did not identify any issues or evidence influencing further growth in the Main Towns. The 44 respondents who did so raised the following issues affecting all main towns:

Summaries of specific comments

All Main Towns

Local infrastructure (including health)

1. Towns need supporting infrastructure and facilities to cope with further development. Infrastructure ranging from schools (both quality and capacity) to health and care is under severe pressure. Accessible local services are required.
2. *Kimberley and Carleton Forehoe PC* argue that large scale developments cause high streets to be non-viable as there is too much traffic and local facilities are unable to adapt. Growth brings in people who are unable to settle or use local facilities as the housing is inappropriate for them.
3. *NHS Norwich CCG* - Health and care partners stated they are not aware of any specific issues at this time, however the impact of future growth in these towns on health services and infrastructure should not be underestimated. Infrastructure requirements and current capacity and clinical workforce shortages need to be considered for each area, as well as distances that patients may be required to travel to access services, which needs to be consistent with the STP [Sustainability and Transformation Partnership] objective of care closer to home. Strong transport links will be required to ensure patients can travel to services including out of hours services. The effects of increases in population on access requirements to secondary care services should be considered when determining infrastructure for local health service development. It is anticipated that as health service reform occurs, emphasis will be placed on local service delivery which will include services displaced from centres of secondary care.

Transport

4. Public transport between the main towns and Norwich is still not as fast, efficient and affordable as it could and should be. This includes evening services and services for work and leisure activities.
5. *Norwich Green Party* argue that public transport options are required to employment destinations, such as Norwich City Centre, NNUH, NRP and BBP. Without such public transport, growth is likely to increase commuting by private car, which would contradict the ambition set out within the transport section of promoting healthier lifestyles and sustainable travel choices, as well as putting stress on Norwich's roads and car parking.

6. Road congestion on feeder and through roads will need to be addressed, along with wider traffic generation issues.
7. Travel to work times are becoming unacceptable, e.g. A140 and Drayton Road.
8. *Breckland District Council* support the approach to Main Towns, but wish to engage in discussions on pressure on the A11 and the wider infrastructure implications that may arise as a result. Other respondents also pointed to the need for good transport links beyond the area.
9. In relation to rail, a half hourly service to Cambridge, disabled access to the London platform and Norwich in 90 are required.

Housing

10. Affordable housing is needed.
11. Social cohesion issues can result from poor quality new housing.
12. *Drayton Farms Ltd represented by CODE Development Planners Ltd* argue that as Harleston, Diss and Aylsham are outside the Norwich Policy Area, where policy has always ensured growth took place in the most sustainable locations close to Norwich, and Wymondham has accommodated substantial levels of growth, the target numbers for the Main Towns should be at the lower levels of suggested allocations.

Environmental issues

13. Allocations must not be made in sites at risk of flooding. Flood risk will increase over time.
14. *Norfolk Wildlife Trust* and *Natural England* stated that the impact on designated wildlife sites, including impacts of visitor pressure, are an issue in relation to some Main Towns. This does not necessarily restrict growth but measures need to be in place to mitigate for impacts on designated sites. New development must provide new green space on site, green infrastructure (GI) links to surrounding PROW [Public Right of Way] network and mitigation of impacts on nearby designated sites.
15. *Natural England* and others stated there are significant issues in terms of water abstraction, with increasing demand from residential and commercial development. Sustainable planning for water resources is needed.
16. *Natural England* also referred to the potential for waste water discharges affecting water quality.
17. To address these issues *Natural England* state that a detailed water cycle study will need to be undertaken to determine where allocations should be located and what measures will be required for water quantity and quality issues, which should then be addressed through policies and allocations in the GNLP. All Main Towns could contribute to water issues and will need to be screened (and issues addressed) through the Habitats Regulations Assessment (HRA), in the case of European and international designated sites, and through the careful location of allocated sites and the inclusion of specific policies within the GNLP.

Other issues

18. Two respondents focussed on local financial gain from growth. One stated that towns and their businesses will supply their own evidence for growth, highlighting any and every favourable issue.
19. Growth in Main Towns will lead to urban sprawl.
20. These issues are best left to local communities to determine in local plans.

21. The commentary provides no assurance or confidence that the public services or physical infrastructure in the Main Towns or Key Service Centres can either support further development or that the new development proposed would be of a quantum that could fund an improvement to those services. There seems to be an overarching assumption that services will cope with minor improvements, which there is no evidence will be the case, although the problems with high school provision in Wymondham are highlighted.

Issues raised for specific towns

Aylsham

22. Some respondents argued that Aylsham has already taken enough growth. Local facilities and infrastructure cannot take more growth without undermining the essential character and quality of the settlement and its setting.
23. Others argue that surgeries are not coping with a demand that has increased by over 30% since 2001 with an increase in people over 60. To have further development Aylsham must have improved health and social care facilities, as well as further primary education places.
24. Parking and the road network also militate against further development.
25. *Norfolk Land Ltd. represented by Cornerstone Planning* argue that the merits of further growth in Aylsham are self-evident as:
- Aylsham has a vibrant town centre;
 - Access will be improved with the opening of the NDR;
 - Employment is provided in the town centre and Dunkirk Industrial estate;
 - There's a good range of services, including secondary education;
 - There are 2 GP surgeries and a dentists, all of which are accepting patients;
 - There are a number of recreational opportunities in or near the town including a recreation ground, a new football facility, the Bure Valley Way, the Marriott's Way and facilities at Blickling Hall.
26. The *Environment Agency (EA)*'s reply to consultation on the Aylsham Neighbourhood Plan emphasised the problem of increased development on waste water facilities.
27. *Westmere Homes represented by Armstrong Rigg Planning* and *Norfolk Homes Ltd represented by Cornerstone Planning Ltd* argued that Anglian Water have advised that it is in a position to invest in new infrastructure to meet additional waste water demand in Aylsham. To support this view, *Westmere Homes* submitted a report undertaken by Create Consulting, based on dialogue with Anglian Water since 2012. It concludes that capacity exists at the Aylsham Waste Water Treatment Works to accommodate flows produced by whatever level of growth is allocated to the town. Furthermore, a smaller standalone works could be provided which deals with site-specific flows and supplements the local network of waste water treatment if necessary.

Diss and Harleston

28. Diss is relatively (compared with Wymondham) underdeveloped and lies on the main rail line to London. It offers the best most potential for growth of the large towns. This should be conducted on a strategic and well planned basis to produce a high quality town extension e.g. on a similar basis to Poundbury.
29. Local issues are congestion on the A1066, poor public transport links - employment is being limited by the poor commuting experience.

30. *Suffolk County Council (SCC)* welcomed the recognition of the interactions between Diss and Harleston and the adjacent parts of Mid Suffolk, particularly the recognition that detailed investigation into what facilities could be expanded and the impact of development on nearby smaller settlements that rely on Diss. It also stated that:
- a. Greater emphasis could be placed on aspects relating to transport, the interaction and roles of settlements, and recreational opportunities along the Waveney Valley. SCC is promoting improvements on the strategic A143 route, which could enable or be supported by appropriate growth.
 - b. Consideration of the wider Waveney Valley area provides an opportunity, working alongside parish and district councils, to review strategic enhancements to the cycle and footpath network.
 - c. Horse riding and the equine industry are important elements of the rural character and economy of Suffolk and as well as Norfolk, and should also be considered.
 - d. The consultation document recognises the potential for enhancing the Green Infrastructure Mapping Project into Suffolk and SCC would welcome further involvement alongside district councils.
 - e. Issues relating to Diss, the traffic connecting to the A140, through Palgrave for example, require further analysis.
 - f. Access to Diss train station, through improvements to the station approach, could promote use of sustainable transport modes.
31. *Norfolk Wildlife Trust (NWT)* stated growth in Diss has the potential to create adverse impacts on nationally (SSSI) and locally designated wildlife sites (County Wildlife Sites) along the Waveney Valley and Frenze Brook, in addition to impacts on Waveney Valley Fens SAC, which should be addressed through the HRA.
32. *Pegasus Planning* state that current development plan documents and the summary in the Growth Options document demonstrate that the northern side of Diss is comparatively unconstrained. It is therefore considered that this offers the greatest potential for further development to support the needs of both the town and the wider area. Previous plan-making exercises have also revealed a local desire for a link road between Heywood Road and Shelfanger Road to assist in addressing local traffic congestion issues. The allocations of development sites in this part of the town could enable this local aspiration to be realised.
33. *Diss and District Neighbourhood Plan Steering Group* and *Scole Parish Council* noted that the group is making a separate written representation on Diss and its surrounding area.

Long Stratton

34. "Does reclassifying Long Stratton as a Main Town actually mean anything?"
35. In enlarging Long Stratton, not enough thought has been given to public transport links.
36. Support was expressed for re-classification of Long Stratton, growth on a well-planned basis and a by-pass.
37. *NWT* stated that the Long Stratton Area Action Plan recognises the impacts of development on designated wildlife sites in the vicinity and there has been initial discussion at the Long Stratton GI group in relation to housing allocations around the town. This recognises the need for new development to provide new green space on

site, GI links to surrounding PROW network and mitigation of impacts on nearby designated sites.

38. *Tivetshall Parish Council* considers that with Long Stratton aiming for town size and status the proposed new road will be inadequate. Provision of a dual carriageway bypass is essential. The traffic growth estimate of only 10% to 2036 is questionable; these figures were established by a “vested interested party”.

Wymondham

39. Concerns were expressed about the expansion of Wymondham southwards causing congestion on the A11, in turn affecting surrounding areas (e.g. Hethersett, Norwich).
40. The gap between Wymondham and Hethersett should be maintained.
41. Careful consideration of additional growth at Wymondham should be undertaken via an enquiry by design process to consider optimal options to reinforce the character of place and a mixed use value proposition such that the settlement place quality and self-sufficiency is maintained and amplified.
42. The relationship of the station to the settlement and the feasibility of a rail or light rail connection between Wymondham and the UEA should be considered.
43. *NWT* state the Area Action Plan recognises that County Wildlife Sites are already under heavy pressure from consented developments that at the time of approval were not required to fully provide sufficient green infrastructure and compensation to mitigate for recreational impacts. The Wymondham AAP and GI group has had some success in taking forward plans to compensate for this through Greater Norwich GI project funds and s106 but any increase in housing numbers will require further measures provide, including provision of on-site green spaces (SANGs).
44. *Carter Jonas LLP* state that the Growth Options document identifies potential constraints to further development - secondary school capacity, the setting of Wymondham Abbey and the setting of the town. The constraints, and the impact on Gonville Hall (a Grade II Listed Building), were assessed as part of an appeal processes in September 2016. The proposed development includes significant areas of green infrastructure and preserves the setting of the tower at Wymondham Abbey and Gonville Hall. It was concluded at the appeal that capacity at the secondary schools in Wymondham was not an issue because evidence demonstrated that children from new developments would be able to gain a place at their nearest secondary school, and that planning obligations would be collected in accordance with the CIL charging schedule to address impacts on school capacity arising. Therefore Carter Jones argue that the constraints affecting further development in Wymondham do not apply to the land south of Gunvil Hall Farm.

Related issues raised

45. *Poringland* would require additional road management to support the increase volume of cars at commuting times.
46. *Caistor St Edmund Parish Council* stated that they do not support the approach to Main Towns and have a number of concerns about development in Caistor St Edmund and the neighbouring parishes.
47. *Otley Properties and John Long Planning* stated that they not wish to comment on this matter at this stage, but reserve the right to do so at later stages if necessary.

THE SETTLEMENT HIERARCHY AND THE INFLUENCE OF THE NORWICH URBAN AREA

Question 23

Do you agree with the approach to the top three tiers of the hierarchy?

A total of 89 responses were received to this question

Of those who answered this question, 72 responded **Yes**, 10 responded **No**, 8 did not specify a response but qualified their answer in comments or provided further information.

Some of the responses on the settlement hierarchy were based on arguing for or against housing allocations in a particular place, rather than on strategic principles for the distribution of housing.

In relation to specific locations, some responses argued that their settlement is unsustainable and should not be allocated for development (including Barford, Bergh Apton, Bramerton, Burston and Shimpling, Dickleburgh and Rushall, Hainford, Hempnall, Marlingford and Colton, Keswick and Intwood, Talconeston and Forncett End, and Salhouse). In a few instances respondents argued that specific locations are sustainable based on their proximity to other settlements (East Carleton, Ketteringham and Scole).

Summaries of specific comments

1. *Bergh Apton Parish Council* agree with their status as an 'Other Village'.
2. *Carter Jonas* (representing a client with land to promote in Wymondham) supports Option SH1.
3. *Carter Jonas* on behalf of *Taylor Wimpey* supports Option SH1, this reflecting their client's development land assets in Rackheath and Costessey. The Norwich Urban Area is the most sustainable in terms of good access to services, facilities, and transport.
4. *CODE Development Planners Ltd* on behalf of clients *Ben Burgess*, *R.G. Carter*, and *Drayton Farms* asked for the removal of the phrase "the built-up parts of the fringe parishes" from Tier 1, reasoning that to meet the objectively assessed need for housing, land outside but adjacent to the built-up parts of specific parishes will be required.
5. *Framingham Earl Parish Council* commented that changing the designation from "Key Service Centres" to "Service Centres" does not alter the fact that such towns and villages will still be "key". Changing the terms seems to be a "marketing exercise".
6. *Norwich Cycling Campaign* supports the Settlement Hierarchy Policy as a means to put in place infrastructure for sustainable transport.
7. *Norwich Green Party* referenced a petition submitted by then Councillor Simeon Jackson. Encouraging everyday private car travel means: congestion delaying journeys, air pollution, danger on busy roads, a less cycle-friendly environment, a shortage of vehicle parking, more council spending on "huge road-building projects",

and CO₂ emissions contributing to global warming, It is added that retaining the settlement hierarchy under Option 1 is the best way to determine what level of development is acceptable in small villages.

8. *Otley Properties* agree with Poringland/Framingham Earl being identified as a Key Service Centre, as well as supporting dispersed growth in villages like Seething and Alington.
9. *Thorpe St Andrew Town Council* consider that infill development should not include development on green spaces. The inclusion of Acle, Blofield, and Brundall within Tier 3 is queried, as growth in all three could cause the loss of their defining features. There is also the risk of distinct places merging into one large settlement.
10. *UEA Estates and Buildings* commented that development in the Norwich Urban Area benefits connectivity to the City, adding that the development of the UEA campus and wider NRP should be encouraged due to its sustainable location.
11. *Westmere Homes* commented about the emphasis on the Norwich Policy Area, and the core Housing Market Area, where the majority of housing need arises from. The suggestion is to split the top three tiers of the settlement hierarchy into five as: 1 Norwich Urban Area, 2 Main towns in NPA, 3 Main Towns in Rural Area, 4 Service Centres in NPA, and, 5 Service Centres in Rural Area.
12. *Wood Plc* supports the approach taken for the top three tiers of the settlement hierarchy and that Wroxham is identified as a Service Centre. Wroxham is well-located to benefit from Norwich's employment growth, it has a range of local services, and environmental constraints are fewer to the south of the settlement.
13. The top three tiers have sustainable services and can support development.
14. Disagreement was expressed with Reepham having the classification as a Key Service Centre for the following reasons:
 - a. Schools are at capacity, with little option to expand, and are struggling to provide for the existing intake. Some children have to travel to Bawdeswell and Aylsham for school.
 - b. The healthcare surgery in Aylsham has only recently been expanded, and has difficulty recruiting staff. The population is older In Reepham and so many people have more in-depth healthcare needs.
 - c. Retail in the Town is limited and the majority of people shop elsewhere.
 - d. Employment in the Town is limited and the majority of people work elsewhere.
 - e. Public transport is limited and constantly at risk of reduction. There is no railway or 'A' roads serving Reepham. The 'B' class roads in and around the Town have "pinch-points" that large vehicles cannot travel around.
 - f. Other relevant points relate to either diminishing what is special about Reepham by development, or that development is constrained. There is a high concentration of listed buildings and a large conservation area to consider. Sewerage capacity could limit the scope for new development. Open space, including heritage and conservation walking routes, are often on the edge of the Town where new development would most likely go. There is a lack of local employment and so more residential development would cause more car-based commuting. New development would also undermine what employment is in the Town. Much of Reepham's economic activity is Small and Medium Enterprises that would leave the Town if new development diminished the very characteristics that caused those businesses to locate in the Town to begin with.

15. The settlement hierarchy protects rural areas from estate development.
16. "This looks like a bit of bureaucracy gone AWOL. What is the purpose other than to bamboozle and slip in development under the radar?"
17. Reepham should be in the top tier of the hierarchy as it has a large rural catchment for the High school.

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Question 24

Do you favour option SH1, and are the villages shown in Appendix 3 correctly placed?

Of those who responded, 67 favoured option SH1, 17 did not. Answers to question 24 generally favoured keeping the lower settlement hierarchy tiers of 4. Service Villages, 5. Other Villages, and 6. Smaller Rural Communities.

Many of the responses are shaped by whether a respondent is arguing a settlement is unsustainable and should not be allocated for development; or whether it is sustainable and should be allocated for more house-building.

Summary of specific comments

1. *Barton Willmore representing JM Trustees* comment that Service Villages, like Spooner Row, are more closely aligned to Key Service Centres. If the settlement hierarchy is to be rationalised the preference should be to combine Key Service Centres and Service Villages as a third tier. Other Villages and Smaller Rural Communities could become a combined fourth tier of the settlement hierarchy.
2. *Bergh Apton Parish Council* appeals for a reduction in the Village's "development status" for a number of reasons.
 - The bus service has been reduced from five trips each way to Norwich down to 3 per day.
 - The post office closed in 2012 but reopened at Green Pastures garden centre.
 - The new post office is a good service, but it is 1.5 miles from the Village centre, and up to 3.5 miles for some villagers.
 - Mains drainage is limited to Mill Road, Church Road, Loddon Road and part of Threadneedle Street.
 - There are no street lights and with the exception of a 30 metre section there are no pavements.
 - The village is more like a collection of hamlets than a well-defined village. In many places the roads are too narrow for vehicles to pass with high traffic speeds.
 - Most children attend Alington primary school but this is nearing capacity. Access to the A146 is already "dangerous" and "over-trafficked" at the junctions with Hellington Corner and Slade Lane – a situation that will worsen as more development takes place along the A146 at Loddon, Chedgrave and Beccles.
3. *Burston and Shimpling Parish Council* comment that it has been wrongly placed as a Service Village. Burston does not have a pre-school, job opportunities, nor travel-to-work public transport. The nave of the church is used as the village hall but it is conceivable that in the medium to longer term this may not be the case. To say Burston has a village hall is consequently something of a misrepresentation. The journey to work bus service is likewise a misrepresentation. Commuters to Diss, if relying on public transport to commute, would be limited to a three and a half hour working day. The bus service for commuters to Norwich is better, but takes one and a quarter hours each way, and costs £14 per day return.

4. *Carter Jonas* agrees with the settlement hierarchy as per Option SH1 and that their client has an interest in land at Wymondham.
5. *CPRE Norfolk* considers it extremely important to maintain the existing JCS settlement hierarchy, and does not agree with option SH2.
6. *Cringleford Parish Council* considers that grouping tiers 4-6 of the settlement hierarchy will result in the consideration of spatially distinct settlements as one entity. There will be increased environmental and social impact, for example the increased use of private cars between settlements that have poor public transport links.
7. *Fornsett Parish Council* comments that Tacolnестon and Fornsett End are indeed linked. Consequently, in the criteria for setting the Settlement Hierarchy it should read "Tacolnестon and Fornsett End". A distinction is necessary as access to services in Fornsett St Peter and Fornsett St Mary are different. The absence of footpaths to Fornsett Primary School especially, but also to Tacolnестon primary school, is questioned, and so whether the criterion of "accessible" is fulfilled. What constitutes "employment opportunities" is also challenged. The Parish Council says insufficient evidence is given to re-classify Fornsett St Peter and Fornsett St Mary as a Service Village. Classifying Tacolnестon and Fornsett End as a Service Village is "borderline", as there is not a post office, or general store, and the bus service is minimal.
8. *Hainford Parish Council* objects to its reclassification as a Service Village.
 - Access by footpaths to the primary school is poor, there is no food shop in the Village, and the public transport is inadequate for journeys to work.
 - Hainford only meets one of the four core service criteria needed to be a Service Village. The limitations of the highway network, the dispersed geography of the Village, and the absence of pavements along routes like the B1354 is mentioned.
 - It is said that local bus company Sanders are reluctant to run more services; there being issues of humps and dips in the road, branches overhanging the narrow roads leading to vehicles becoming damaged, and that in places along Newton Street buses have to mount the verge to avoid oncoming traffic. The times and frequency of buses are considered insufficient to amount to a travel to work service. To emphasise the point attention is drawn to a Highways Authority comment about a planning application for a single dwelling on Grange Road. The view expressed from the Highways Authority was that development would be over-reliant on the private car and contrary to sustainability objectives.
 - As to the settlement hierarchy secondary level criteria, Hainford meets four out of the 12 criteria. Flood risk and the absence of infrastructure are further reasons for not allowing more development in Hainford. The Parish Council objects to what is referred to as a district council "'member' driven initiative" to redefine the settlement hierarchy and that no previous consultation was issued on this matter to the Parish Council.
 - Other nearby villages are better suited to have Service Village status; for instance, Frettenham where the village is well-defined and well-served with pavements.
 - The inclusion of Hainford in the Norwich Urban Growth Area is also objected to the strongest terms.

9. *Hempnall Parish Council* opposes any development beyond the currently defined development boundary. The settlement hierarchy should not change and Hempnall should stay as a Service Village.
10. *Kimberley and Carleton Forehoe Parish Council* comments that there is no journey to work bus service from either Kimberley or Carleton Forehoe. It is said as well that Carleton Forehoe is a separate hamlet two miles from Kimberley with just 26 houses, and for planning purposes it should be considered separately from Kimberley.
11. *Lanpro* supports Option SH1, but is also supportive of development in Service Villages, and that some villages by sharing services could be considered sustainable places for growth. An example of a Service Village that could grow is Barford where Lanpro are promoting a site.
12. *Little Melton Parish Council* comment that parishioners do not think the village has four core services to justify its place in the settlement hierarchy. In respect to a journey to work bus service, for someone finishing work in Norwich, they have to catch a bus to the hospital, but the last bus leaves the hospital at 17:15 and that is too early. Very few people use the bus and traffic surveys done in Little Melton show twice the traffic as predicted by TRICS (Trip Rate Information Computer System).
13. *Norwich Green Party* prefer Option SH1. As a minimum being able to travel to work and school (both primary and secondary) is the minimum for a Service Village. Some Service Villages may need public transport improvements before an allocation for growth. Support is given to tiers 5 and 6 of the settlement hierarchy being “unsustainable for growth”. Option SH2 is opposed, and it is observed that rural communities are very different to service villages.
14. *Otley Properties* support Option SH1, as Key Service Centres like Poringland and Framingham Earl have potential to accommodate a significant level of growth. Service villages like Seething and Alington, could also accommodate additional growth.
15. *Pegasus* representing *Trustees of Arminghall Settlement* said they disagree with where villages are placed in the settlement hierarchy because it would actively prevent the consideration of the proximity of supporting facilities. Alternative strategies are needed in rural areas and the approach taken by the GNLP is contrary to the draft NPPF.
16. *Salhouse Parish Council* say that Appendix 3 is correct in relation to Salhouse village.
17. *Savills* on behalf of various clients (*Thelveton Farms, Trustees of Major JS Crisp, and J Fenwick Esq*) say that Option SH1 does not address the realities of rural communities. Appropriate regard should be given to smaller villages and hamlets where services such as the pub and primary school are struggling. The draft NPPF at paragraph 80 says: “Where there are groups of smaller settlements, development in one village may support services in a village nearby.” National Planning Guidance also says that all settlements can play a role in delivering sustainable development. Blanket policies for restricting housing development and preventing other settlements from expanding should be avoided.
18. *Savills* representing *G H Allen* comment that Hempnall should be changed to a Key Service Centre. There are many services and facilities, as listed in the ‘Options Document’. A correction is that Hempnall has a GP surgery at Mill Road. Long Stratton is nearby where most high school children attend. Option SH2 is preferred.

19. *Savills* representing *Rippon Hall Farm* comment that Option SH1 is an oversimplification of rural communities. Options SH2 is preferred and support is given to classifying Hevingham as a Service Village.
20. *Savills* representing *Ditchingham Farms* say that Broome should not be downgraded from a Service Village to Other Village. Broome benefits from facilities in Ditchingham and the two places appear as one settlement centred on the Nature Reserve. It is 0.8 miles between Broome and Ditchingham and it is a walkable Public Right of Way.
21. *Starston* is correctly placed as an “Other Village”. Public transport amounts to four buses per day into Norwich and there is a small village hall.
22. *Suffolk County Council* welcomes the consideration in Appendix 3 of safe access to primary schools because otherwise there are ongoing costs to the taxpayer in providing transportation to school.
23. A series of objections were made by individuals about upgrading *Hainford* from an “Other Village” to a “Service Village”.
 - The Village is small and quiet it would be preferred if Hainford stayed that way.
 - On a practical level, there are matters of accessibility to the primary school by footpath, the inadequacy of the road network to cope with more traffic and issues with the sewerage system.
 - The travel to work bus service is very limited. There are services at 07:00 and 07:22 but then the next bus is 09:00. For the return journey the last bus into the Village is about 17:00, too early for regular 09:00 to 17:00 jobs.
 - There is indeed a pre-school that is located in the Village Hall but there is the issue of poor accessibility.
 - Hainford satisfies only one of the four core services criteria, and only two of the eight secondary services criteria, instead of seven out of 12 as the GNLP erroneously indicates. The errors are not an acceptable basis on which to make decisions about the development status of Hainford.
 - The report by the Parish Council is endorsed by several of the respondents. At a parish meeting, both local councillors (for the district and county councils) said they would oppose Hainford changing to a Service Village.
24. The classification of *Tacolneston* and *Fornsett End* appears to be wrong. The primary school is not accessible by pavements. As well as being under threat from cuts the bus service is limited and inadequate for people who work shifts. There is no post office, food shop, petrol station, employment opportunities, or healthcare facility.

Question 25

Do you favour the Village Group approach in option SH2?

22 respondents were in favour of the Village Group approach, and 53 against. It is evident though that at least some responses are based on arguing for or against housing allocations in a particular place.

Overview

Opposition from many to the 'Village Group' approach focused on the view that inclusion in a group might lead to individual villages having more housing or that it would lead to the merger of villages, and the loss of countryside, character, identity and distinctiveness. It was also argued that placing all settlements in 'Village Groups' would open up the entirety of rural Greater Norwich for significant development, increasing car dependency and undermining the purpose of a settlement hierarchy. Those supporting 'Village Groups' argued that villages already share services, with some stating that this approach is favoured in draft National Planning Policy framework (NPPF) paragraph 80, which says "*Where there are groups of smaller settlements, development in one village may support services in a village nearby.*" It was also argued that there is merit in linking settlements at different scales of the hierarchy which share services, with Diss used as an example of a town which shares services with neighbouring villages, including some in Suffolk. Mid Suffolk was quoted as a district developing such an approach.

Summaries of specific comments

In regard to part a) "What criteria should be used to define groups?" comments given were as follows:

1. *The Broads Authority* comment in respect to Figure 5, page 55, rows numbered 4, 5, 6 that no mention is made of "environmental and infrastructure constraints", which is unlike the other rows. As to Figure 6, tier 4 Village Groups it is asked whether the GNLP will allocate the groups.
2. *Climate Hope Action in Norfolk* sees option SH2 as being almost entirely dependent on the private car to reach essential services which is incompatible with reducing transport-related carbon emissions. The bottom three tiers of the settlement hierarchy are in no way a homogeneous group, and SH2 threatens the characteristics of low-density rural places and important countryside.
3. *CPRE Norfolk* considers it extremely important to maintain the existing JCS settlement hierarchy, and does not agree with option SH2.
4. *Costessey Town Council* considers that small-scale growth in every settlement is probably the best option for ensuring the viability of small settlements, and "to bring newer residents in at a controlled rate to keep the settlement alive". However, in smaller centres it could be difficult to travel by public transport to work and services. A principle is that "employment must be accessible".
5. *Hempnall Parish Council* consider the existing settlement hierarchy should be retained and would resist any attempt to be elevated to a Key Service Centre.
6. *Keswick and Intwood Parish Council* consider that their parish should not fall within the scope of growth considerations applicable to Service Villages. Keswick has a Reading Room but no other Service Village facilities. The nearest bus stop is a

lengthy walk from the Mulbarton Road. The main route through Keswick, Low Road is narrow, unlit, without road markings, without pavements, is unsuitable for HGVs; but, nevertheless is a 'rat run' between the A140 and A11.

7. *Marlingford and Colton Parish Council* said "this approach has nothing to recommend it and could too easily lead to high-impact and completely unsustainable development in lower-tier villages and settlements." The groupings would be "artificial" and Village Group clustering is not supported.
8. *Wrampingham Parish Council* points out that parish councils are well-placed to understand the growth needs of their village. The cluster approach could also cause tension and bad-feeling between villages if one is seen to be taking a smaller proportion of housing.
9. *CODE Development Planners Ltd, representing Ben Burgess Ltd*, supports option SH2 when considered against NPPF paragraph 55. The view being that land promoted in Swainsthorpe has the benefit of the mutually supported services in Mulbarton, Swainsthorpe, Stoke Holy Cross, Newton Flotman and Swardston. In assessing sites in village groups, CODE recommends applying the NPPF's "three dimensions" of planning, adding that a proportionate number of new homes should be allocated on sites adjacent to defined settlement boundaries. The justification for which is that site specific allocations are vital to ensuring the growth is spread out evenly and sustainably, as opposed to concentrating growth in tier four village group settlements to a small number of larger sites.
10. Option SH2 undermines the point of a settlement hierarchy, losing "the vital distinction between a village where residents can walk to the shop or primary school, and one where they have to drive to one in another village." SH2 appears to open the entirety of rural Greater Norwich to growth and would increase car dependency. "Villages and hamlets with few or no services are not suitable for growth -- that is why the hierarchy exists."
11. *Diss and District Neighbourhood Plan Steering Group* points out how the Babergh Mid Suffolk clustered settlement approach has the effect (in GNLP terminology) of linking clusters to a Main Town or Service Centre.
12. *Norwich Green Party* consider Village Groups contrary to promoting sustainable travel. As a minimum being able to travel to work and school (both primary and secondary) is the minimum for a Service Village. Some Service Villages may need public transport improvements before an allocation for growth. Support is given to tiers 5 and 6 of the settlement hierarchy being "unsustainable for growth". Option SH2 is opposed, and it is observed that rural communities are very different to service villages. Wrampingham and Barford are used as examples. Wrampingham is served by Barford, but access is totally reliant on the car, and is not suitable for development. Barford, with public transport and a school, might be suitable for further development.
13. *Lanpro* do not support option SH2, arguing that it provides less certainty about the scale of development a community can expect; and, raises questions about the sustainability of developing places that are reliant on services that are located elsewhere.
14. *Otley Properties* supports the top three tiers of the settlement hierarchy with Services Villages such as Seething and Alington as the next tier to accommodate reasonable (village scale) growth.

15. *Savills*, representing landowners in Hempnall, say that option SH2 is consistent with the draft NPPF that places emphasis on rural housing (draft paragraph 69 and 80). *Savills* say that the distance to facilities should be relevant to defining groups (reflecting paragraph 55 of the existing NPPF). Regard should be given to the proximity of Hempnall to Long Stratton.
16. "More bureaucracy gone mad", it is doubted that even broad criteria could be used across the whole county. With hesitancy, option SH1 is preferred, as for Village Groups it "really doesn't seem like it could work effectively".
17. There must be safe pedestrian access between villages in any group.
18. Apply parish boundaries as they recognise and respect local identities.
19. Criteria should be that village groups already sustain a pub, a primary school, a shop, a doctor's surgery, a chemist, a post office and a regular and frequent bus service to Norwich suitable for commuters on long hours.
20. Criteria for village groups should include "proximity, sharing of key services such as village halls, community groups, churches, parish councils, etc."
21. Criteria for village groups should be "health centre, education, shop/post office, Village Centre, transport".
22. Objection is made to including *Hainford* as a Service Village, as amenities are limited, "it is only partly paved", the road network is "not conducive to increased traffic", and the A140/Waterloo Road junction is difficult.
23. The very rationale for the current six tiered approach is that the other villages and rural countryside each have their own very distinct character. The current system does allow for developments where there are exceptional circumstances so there is no need for a change. This approach would proportionately disadvantage South Norfolk residents as they have more residents in this category.
24. Service villages are expected to take too much development, and having a primary school is not necessarily a good criteria for ranking, as there are so many small settlements with primary schools. Also, some services are not correctly attributed, for example *Tasburgh* does not have a petrol station.
25. Many villages are too far apart to be grouped, and with no public transport between them it would be impossible to access joint services without having a car.
26. *Hainford* does not fulfil either of the sets of criteria for a Service Village so should stay as an Other Village.
27. The concept of the settlement hierarchy is flawed, as it does not reflect the potential to improve facilities in a place through development. In a place such as Norfolk, overdevelopment could jeopardise tourism.

In regard to part b) "Which specific villages could form groups?" comments given were as follows:

28. A comment was that "there are no other villages which *Keswick* could group with without being absorbed and lost", as was recognised by a recent parish boundary review.
29. *East Carleton* is thought incorrectly classified as it has an outdoor recreation facility, active community groups, and a church frequently used as a village hall.

30. *The Diss and District Neighbourhood Plan Area* includes *Burston and Shimpling, Roydon and Scole*, as well as settlements in the three parishes of *Brome and Oakley, Palgrave and Stuston* in Mid Suffolk.
31. *Tivetshall Parish Council* did not wish to see Tivetshall grouped with any growth allocation.

In regard to part c) "How could growth be allocated between villages within a group?" comments given were:

32. *The Diss and District Neighbourhood Plan Steering Group* will bring forward proposals for the allocation of growth across the area according to the assessed housing need and other criteria.
33. Prioritise windfall sites so as to fill-in gaps with small scale development, matching local need, and as per neighbourhood plans where applicable.
34. *Norwich Clinical Commissioning Group (CCG)* does not support the village group approach as it would make it difficult to deliver health services closer to home and would likely increase travel times for the majority of patients.
35. *Burston and Shimpling Parish Council* query whether the grouping approach will mean services are accessible. For example, "there is a nice village hall in Tivetshall ... but how does one get there?"

Question 26

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

65 respondents said they favoured a Norwich centred policy area, and 13 did not. Some did not wish to comment on the issue. Amongst some of the respondents it is evident they had a settlement or site in mind when commenting, wanting either to 'push' development elsewhere or to promote sites.

Overview

Arguments in favour of a Norwich centred policy tended to be about the City being a driver for economic growth, preventing development sprawl, sustainable transport, and protecting rural areas. Arguments against a Norwich centred policy reflected upon the Norwich housing market having a wider reach than the current Norwich Policy Area (NPA). Suggestions for drawing the boundary ranged from keeping the Norwich Policy Area (NPA) boundary as it is, drawing the boundary more tightly, as well as expanding to the core housing market area as defined in the SHMA. A notable feature is how respondents discuss the Norwich centred policy area in relation to achieving a five-year land supply. It is evident too that some respondents have a settlement or site in mind when commenting, wanting to 'push' development elsewhere or to promote sites. An alternative approach proposed keeping a Norwich centred policy for spatial distribution purposes but not for calculating the five-year housing land supply. Those opposed to having a Norwich centred policy area argued that it was unnecessary as site allocations made in the new plan and a settlement hierarchy based on the Norwich Urban Area and the Main Towns could be relied upon instead.

Summaries of specific comments

Organisations and parish/town councils in favour of a Norwich centred policy were: *Ben Burgess Ltd, Bullen Developments, Code Development Planners, CPRE Norfolk, Gladman Developments, Norwich Green Party, Norwich Business Improvement District, and UEA Estates and Buildings; Bramerton, Cringleford, Hainford, Hempnall, Marlingford and Colton, Kimberley and Carleton Forehoe, Reepham, Saxlingham, Thorpe St Andrew, and Thurton* parish and town councils. Organisations and parish/town councils that were more cautious about a Norwich centred policy, or wanted a wider boundary than the current Norwich Policy Area, were: *Carter Jonas, Diss and District Neighbourhood Plan Steering Group, Norfolk Land, Norfolk Homes and, Brundall, Drayton, and Scole* parish councils.

Specific points raised were as follows:

1. A comment was to take an entire county approach so as to account for the "draw" of Cambridge combined with a site specific "granular housing market analysis".
2. *Bullen Developments* said the NPA had served Norwich and Norfolk well and should be retained. The NPA had helped the area's reputation for sustainable growth and economic excellence in the bio-medical and life science research sectors. The sentiment in paragraph 4.161 of the Growth Options document is supported by *Bullen*.

3. *Carter Jones LLP* said how the overall aim of directing development to sites in the NPA could be achieved with the settlement hierarchy, the allocation of sites in accordance with that hierarchy, a strategy based on the principles of sustainable development, and monitoring housing delivery numbers as per NPPF requirements.
4. *CPRE Norfolk* favour keeping the Norwich Policy Area (NPA) as it accords with their preference for “a concentrated urban option” and that the NPA has prevented large-scale estate development in rural parishes.
5. *Gladman Developments* said that without knowing what would be written into the Norwich centred policy it is difficult to comment on question 26. However, on the basis of directing housing to the most sustainable locations for growth the NPA should be retained.
6. *Hainford Parish Council* argue for drawing the Norwich centred policy within the boundaries of the NDR (Northern Distributor Road) and SDR (Southern Distributor Road) [i.e. Southern Bypass].
7. *Norfolk Land* prefers the boundary of the Norwich Core Housing Market Area, which would be less contrived than the current Norwich Policy Area, and would include the Town of Aylsham.
8. *Norwich Green Party* said the Norwich centred policy boundary should only slightly exceed the Norwich urban area to include villages in tiers 4, 5 and 6 of the settlement hierarchy that are not more appropriately served by a Key Service Centre of Main Town.
9. *Kimberley and Carleton Forehoe Parish Council* favour drawing the boundary to the ring road (sic) because Wymondham had already been over-developed.
10. *Thorpe St Andrew Town Council* suggests a wider policy area to include main towns and service centres as identified in option SH1 of the Growth Options document for a 6 tiered settlement hierarchy.

EMPLOYMENT LAND

Question 27

Which option or options do you support in relation to employment land supply?

Option EC1: Broadly maintain the current supply of employment land.

Option EC2: Significantly reduce the overall level of supply while still maintaining choice and flexibility

Option EC3: Develop a criteria-based policy allowing windfall development.

A total of 71 responses were received to this question, of which 49 expressed a preference for at least one of the options. Of these, eight respondents selected more than one option (most commonly a combination of EC2 and EC3). 18 respondents supported option EC1, 23 supported EC2 and 15 supported EC3. 22 respondents did not indicate a preference for any of the options.

Overview

Option EC2 was supported by just under half of those who expressed a preference. Reallocating employment land was supported for a number of reasons including making more land (including brownfield land), available for housing, reducing the negative impacts of out-of-centre development and making out-of-centre development more mixed use to improve sustainability.

Option EC1 was supported by around 30% of those who expressed a preference. Maintaining the current level of employment land was supported to support economic growth and maintain a wide choice.

Similar numbers supported Option EC3, the development of a criteria based policy.

Summaries of specific comments

Comments included the need for flexibility to adapt to emerging business models; allowance for single occupier sites; alignment with key growth sectors, location in relation to settlement boundaries and transport corridors; encouragement of mixed use; and, the need for sites to be accessible by walking, cycling and public transport.

1. Some agents' comments relate to the promotion of specific sites either to be allocated for employment uses or reallocated from employment uses. Expansion of NRP and the Food Enterprise Park are promoted.
2. Some agents contend that there are weaknesses in the existing employment land supply including contamination, infrastructure and servicing constraints, poor land values; ownership issues; and unsustainable rural locations. Land should be in the right place and of the right type to meet business needs.
3. *New Anglia LEP*, subject to suitably robust evidence, support the reduction in the overall supply of employment land while maintaining choice and flexibility, alongside the development of a criteria-based policy to allow for 'appropriate' windfall development. This is the best way to ensure that the plan will be "agile" and ensure long-term sustainability.
4. *Highways England* were concerned that Option EC3 would result in a degree of uncertainty regarding the potential location of employment development and hence the potential impact upon the strategic road network. Certainty will be needed to

reasonably identify the infrastructure required to support the Local Plan, although the need for some flexibility is accepted. It is expected that there would be an impact on the A47 through Honingham and Easton, as well as the A47 at the A11 Thickthorn and the B1108 Watton Road junctions, due to the proposals for development in close proximity to these sections of the network.

5. *Historic England* commented that all options should consider the need to conserve and enhance the historic environment
6. *Diss and District Neighbourhood Plan Steering Group* will be looking at sites serving the area including in Mid Suffolk.

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Question 28

Which allocated or existing employment sites should be identified as strategic sites and protected?

29 respondents commented with suggestions for strategic sites to identify. Four private individuals and a number of other organisations stated that they did not know of any or did not wish to comment. In addition *Otley Properties* indicated that they did not wish to comment at this stage but reserved the right to comment at a later stage.

Summaries of specific comments

1. Sites/locations suggested by consultees as strategic employment sites for protection:
 - Colmans site, Carrow works
 - City centre sites/the Norwich BID area
 - Norwich Airport
 - Site 4 (GNLP1061) at the northern edge of Norwich Airport, to be potentially allocated for unrestricted employment uses
 - Hethel
 - Norwich Research Park/ Norfolk and Norwich University Hospital/additional land wrapping round the hospital potentially for hospital expansion
 - Land currently allocated as site R41 in the Norwich Site Allocations Local Plan (Land South of Suffolk Walk), identified as a strategic reserve for University of East Anglia campus expansion. Protection as a strategic site is supported to enable sustainable, long-term growth of the Campus.
 - Broadland Business Park,
 - Norwich Business Park (*sic*)
 - Land currently allocated as site HNF3 in the Broadland Site Allocations DPD (Land at Abbey Farm Commercial Park, Horsham St Faith) for employment uses, given its compliance with national and local policy objectives. The site is well located to serve both local and strategic needs and would help meet the needs of small, medium and start-up business.
2. More general suggestions were:
 - Sites on the edge of the city and in prime locations benefiting from good access to the highway network should be protected.; and
 - All existing employment sites should be protected
 - The employment, tourism activity and boating industry in the southern part of Brundall should be protected to continue to provide local employment opportunities.

Additional sites proposed:

- Markshall Farm, Caistor St Edmund/Keswick (potential mixed use allocation on land to the north, south and east of Tesco on the A140 at Harford Bridges. (This site has been submitted for consideration as a potential mixed use allocation through the Regulation 18 consultation as Site GNLP2158).

Opposition to sites

3. One respondent suggested that there should be no further employment at Honingham as: there is no benefit of using agricultural land; Colman's would be better suited for the

Food Hub than a green field site with no infrastructure; spare capacity at existing employment hubs should be used before considering additional sites or extensions to allocated areas.

4. One respondent suggested Wymondham should not have engineering or housing/school development; this should be focused on Hethel where the employment will be. Browick Road in Wymondham may be the only suitable area.
5. *Pigeon Investment Management* commented that Reepham does not contain any employment allocations that could be considered as strategic sites.

Other comments

6. The *Diss and District Neighbourhood Plan Steering Group* may identify such sites in due course.
7. *New Anglia LEP* commented that where sites have a particular high-value sector focus such as Norwich Research Park, these should be protected and promoted accordingly. Decision making should be evidence-led, flexible to future changes and focussed on delivering sustainable high-growth opportunities in order to meet the full potential of the area.
8. *Climate Hope Action in Norfolk* propose the identification of a site for a sustainable development business hub as a flagship ingredient of a strong aspirational vision for a truly sustainable *Greater Norwich*.
9. *Norfolk Chamber of Commerce* raised a number of points including
 - A stable and growing economy to support the large quantity of housing will require more employers and employment land.
 - Give consideration to site flexibility within the plan, to accommodate future changes in the economy or the local housing situation.
 - Many SMEs are looking for accommodation of up to 3,000/3,500 sq.ft. At present, there is very little employment accommodation of a suitable size. Give consideration to allocating self-build employment plots?
 - Some employment sites take too long to evolve, with developers not being able to build for rents that are affordable to SMEs - give consideration to an 'affordable allocation' for each employment site, allowing sites to come forward at levels that will encourage new development.
 - Norwich city centre has very limited quality B1 office space available - what opportunities can the GNLP include to open up future potential within the city?
 - Office to residential conversions within the city appear to be low quality. There may be issues with these properties in the future, which could result in values declining. Consider closing (sic) or limiting Permitted Development rights to ensure the proportion of office space lost in the city remains in balance.
 - To accommodate future changing trends in retail patterns, flexibility needs to be considered on change of use for city centre retail and leisure.

Question 29

Are there employment areas that should be identified as suitable for release for residential uses?

28 respondents commented with suggestions for sites with potential to release for residential purposes. Five individual respondents and one organisation stated that they did not know of any or did not wish to comment. In addition *Otley Properties* indicated that they did not wish to comment at this stage but reserved the right to comment at a later stage.

Summaries of specific comments

1. Sites/locations suggested by respondents as suitable for release for residential uses:
 - Browick Road, Wymondham, with its closeness to the A11 and links to the A47, might be a useful residential site.
 - Former EEB Offices, Duke Street, Norwich (also known as Duke's Wharf). *Bidwells, on behalf of Highcourt Developments Ltd* consider that the site, currently identified for office-led mixed use redevelopment should be allocated for residential-led mixed use. [This site is being promoted for that purpose through the Greater Norwich Local Plan process as GNLPO401]
 - South of Barrack Street and to the west of Gilders Way. *Savills* on behalf of *Jarrold and Sons and Hill Residential Ltd* seek allocation of the site for residential development and question its suitability for employment use [This site is being promoted for that purpose through the Greater Norwich Local Plan process as site GNLPO409R].
 - Manor Park Blofield
 - The old factories down by the river Wensum, the Jarrolds site, Colmans factory, the Riverside. (*Cringleford Parish Council*)
 - Hethel, East Carleton, Ketteringham (*Kimberley and Carleton Forehoe Parish Council*)
2. More general suggestions were:
 - Several consultees opposed any reallocation for housing
 - Only brownfield land should be re-allocated for housing
 - Some housing would be well positioned, if environmentally attractive, so that people do not have to commute miles adding to the general gridlock that is Norwich's traffic.
 - There are a number of allocated employment sites that wont be developed in the foreseeable period because of particular characteristics relating to access, contamination, etc. These types of sites should be promoted for alternative uses such as residential.
 - Reallocation of some sites could be considered after a thorough review

Other comments

3. *The Diss and District Neighbourhood Plan Steering Group* may identify such sites in due course.
4. *New Anglia LEP*. Yes, potentially those without a specific high-value sector focus could be considered. There may also be opportunity for new sites of various sizes if the evidence supports that. Decision making should be evidence-led and focussed

on delivering sustainable future opportunities in order to meet the full potential of the area.

5. The *Norwich Society* is concerned that Norwich lacks a number of key facilities to ensure its economy and its people thrive in the future. The growing importance of the creative industries requires infrastructure to attract people with the right skills against international competition. A site should be allocated for a concert hall and conference centre, preferably with an associated quality hotel and, possibly, other arts facilities. The Unilever site seems to be an obvious candidate. Others worth considering would be the site adjacent to the Jarrold Bridge [Barrack Street] and the Archant site in Rouen Road.
6. *Climate Hope Action in Norfolk* consider that any large area reallocated to housing should comply with the criteria for a new settlement - i.e. only to be considered after full exploitation of brownfield and city sites; and to be developed as a low carbon community.

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Question 30

Are there any new employment sites that should be allocated?

26 respondents commented with suggestions for sites with potential to release for residential purposes. Five individual respondents and one organisation stated that they did not know of any or did not wish to comment. In addition *Otley Properties* indicated that they did not wish to comment at this stage but reserved the right to comment at a later stage.

Summaries of specific comments

1. Sites/locations suggested by respondents as suitable for new employment allocations:
 - Taverham - Fir Covert Road/Fakenham Road.
 - Reepham - Wood Dalling Road, (site GNLPO096 submitted for residential) should be designated as a new employment area (proposed by *Reepham Town Council* and one other).
 - Reepham - Dereham Road – original submission modified to include employment as part of a mixed use development
 - Norwich - Colmans Carrow Works site
 - Norwich – two new sites for University related uses, incorporating employment uses
 - Horsford - Glebe Farm (north and south of the NDR), – proposed by *Bidwells*
 - Hethel (possibly)
 - Keswick - Land between A140 and B1113, (additional to existing allocation)
 - Horsham St Faith - Airport Business Park A140/NDR. Existing allocation should be modified so as not to be restricted to 'employment uses' benefiting from an airport location, and the type of uses should extend beyond B1, B2 and B8 uses to incorporate roadside services (including Petrol Filling Station) and a hotel facility
 - Bixley/Framingham Earl - Park Farm for commercial uses; and two mixed use sites at Octagon Farm.
 - Poringland area – consultee looking for employment sites in and around Poringland so that drive to work time can be reduced and/or eliminated by workers walking or cycling to work
 - Caistor St Edmund, east of A140 and north of A47
 - Swainsthorpe, Ipswich Road (potential relocation site for Ben Burgess Ltd)
 - Easton/Honingham as part of the new settlement at Honingham Thorpe
2. More general suggestions were:
 - No new sites should be allocated, or not until existing allocations and brownfield land is taken up
 - New employment land should be included in all strategic site allocations which should be mixed use to support sustainable urban footprinting, trip reduction, place competitiveness and self sufficiency

Other comments

3. The *Diss and District Neighbourhood Plan Steering Group* will bring forward proposals for the allocation of sites across the Area according to the assessed need and other criteria.
4. *New Anglia LEP* would welcome the three significant proposals presented (Norwich Research Park extension, Food Enterprise Zone (FEZ) extension and a new CNTC (Cambridge Norwich Tech Corridor) specific employment opportunity as part of a wider new settlement at Hethel) subject to appropriate evidence regarding need and suitability, as they offer potential for further high-value sector specific opportunities. As previously stated decision making should be flexible to future changes and focussed on delivering sustainable growth opportunities in order to meet the full potential of the area.

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THE RETAIL HIERARCHY

Question 31

Should the position of any of the centres in the retail hierarchy be changed?

Of the 56 separate responses received to this question, two did not respond either Yes or No but supplied additional comments, two did not express a view (Not Applicable), 41 respondents (about 75%) considered that the retail hierarchy should not be changed, several indicating that Norwich should remain pre-eminent, nine considered that change was required. *Otley Properties* and *Pigeon Investments Ltd* indicated that they did not wish to comment at this stage but reserved the right to comment at a later stage.

Question 32

Do any of the existing retail centres have scope to expand to accommodate further floorspace?

Summaries of specific comments

1. Views expressed by those who supported a change to the hierarchy were varied with some supporting a tighter focus on Norwich and/or less out of centre development, and some supporting more development in the towns, more out of town development or more dispersed rural development.
2. Locations suggested for out of centre or out of town retail and leisure development are at **Diss, Longwater, Riverside** (intensification) and **Wymondham**.
3. Several respondents supported investment in the city centre and town centres and remind the authorities of the sequential approach and town centre first requirement of national policy in the NPPF. It is suggested that vacant space and flexible redevelopment can provide capacity in centres.
4. *Norwich Business Improvement District* suggest that the Greater Norwich Local Plan should be more positive towards the City Centre, as a healthy and vibrant City Centre is vitally important to the area's overall economic well-being. They suggest that it is essential for the City Centre to maintain its status as the highest order centre in the area (and its national reputation) by maximising its economic potential and attracting more shoppers, workers, residents and visitors. Allocating 'out-of-centre locations' would seriously impact on the economic potential of the City Centre.

THE RURAL ECONOMY

Question 33

What measures could the GNLP introduce to boost the rural economy?

A total of 62 separate responses were made to this question.

Summaries of specific comments

Respondents contributed a wide range of ideas and views:

Key themes

1. *New Anglia LEP, Scole, Hainford, Framingham Earl, Poringland, Tivetshall, Bramerton Parish Councils, Diss and District Neighbourhood Plan Steering Group* and several individual respondents supported the need for significant improvement to **broadband and telecommunications**.
2. The need to be **future focussed** and avoiding out-dated ideas and concepts, to be flexible and keep pace with fast changing dynamics of the economy.
3. The importance of **agriculture and related industries**. Growth based on technology and advances in science and agri-tech research. Connectivity between efficient agriculture, protection of natural capital, and business opportunities. (*CPRE Norfolk* and others)
4. Promotion of **wider employment uses in the rural area** with greater flexibility to reflect the rural location and recognising the limitations that places on accessibility and public transport, the locational requirements of rural businesses, key growth sectors, high land take operations and single occupier sites.
5. Encouragement for **mixed use developments** (this principally from the development industry and their agents).
6. The **Food Enterprise Zone** received some support but significantly greater opposition principally to the detrimental impact on the rural economy of centralisation, loss of agricultural land and the availability of alternative allocations available.
7. Many responses supported **rural tourism and leisure** through a range of proposals:
 - Boost tourism (including eco-tourism), and achieve other objectives at the same time, by creating long and/or circular walks, cycleways and bridleways and good rural bus service; supported by a wide range of initiatives such as signage, information boards, shelters, etc.).
 - protecting quiet rural communities from over-development
 - Stop building on agricultural land and retain attractive, open and rural landscape.
 - Protect and enhance the countryside adjacent to market towns to provide green spaces for recreation and boost for rural tourism.
 - Insist on the retention of local character through better design and location of new housing.
8. Need for improved **transport infrastructure and services**. Specific schemes identified were:
 - Norwich Western Link (dualled)
 - A47 dualled its entire length through Norfolk.
 - Dualling of the A140 Norwich to Ipswich route.
 - Upgrade A11 to improve safety.

- Strategic dualled bypasses to protect existing settlements.
 - Upgrade the Longwater Interchange.
 - Grade separated junctions throughout.
 - Expansion of park and ride services
 - Better public transport. Better rail connections.
 - Greater provision of electric car charging points.
9. **Infrastructure** should precede or match development. Infrastructure required includes Healthcare, Police, Libraries, Post offices
 10. Support **local food production**; opposition to large supermarkets.
 11. Importance of **quality of life, well-being, sense of place and community cohesion** in rural locations in sustaining local communities and economies.
 12. Both support for and opposition to **solar farms** was evident. Encouragement for solar on rooftops of larger farm and other non-residential buildings. *Cringleford Parish Council* supported the promotion of renewable energy on lower grade agricultural land.
 13. Create opportunities for **local employment**, including 'start-ups', artisan and craft workers, with policies that allow flexible use of premises and infill sites. Examples being: Farmers markets/craft markets. Farm to Fork. Need to promote green businesses thereby reducing the carbon footprint of locally produced products.
 14. **Better use of local schools and village halls** to support education, sports/leisure and entertainment.
 15. Provision of **technology hubs** shared across villages.
 16. A **sustainable development hub** exploiting the distributed nature of renewable energy and widespread need for upgrading of existing housing stock. (*Climate Hope Action in Norfolk*)
 17. **Appropriate scale of housing** in key service centres and service villages, and more small sites to support small builders and their workforce, and to support the local services.
 18. **Re-use of previously developed sites** both within existing settlement boundaries and within the open countryside. The provision of local services should also be supported in locations where identified needs are not met by existing facilities in rural villages.
 19. **More affordable housing** in rural areas with vastly improved transport links to allow for more integrated delivery of health and social care services. Rural areas require health and social care services within the community and closer to home, with better broadband to allow for virtual consultations with health professionals and increased online interaction with health services. (*NHS Norwich CCG*)
 20. Greater use of **redundant agricultural/commercial buildings** for housing.

Specific site proposals

21. A **new garden village** in the Cambridge Norwich Tech Corridor between Wymondham and Hethel (promoted by *Lanpro Services Ltd* on behalf of *Glavenhill Strategic Land*)
22. Existing tourism business at **Barnham Broom Golf and Country Club** supported by retirement housing and staff accommodation in Colton (*promoted by Cornerstone Planning* on behalf of *Barnham Broom Golf and Country Club*).

Other suggestions

23. Need for gas connections.
24. Norwich Airport – more services
25. Develop rural industry skills through apprenticeships etc
26. Council tax free periods for start-up companies. Other financial support.
27. Programmes of compulsory purchase of the redundant buildings and land to support the setting up of small business units.
28. Consider childcare businesses which provide jobs, a service to families and enable parents to work and contribute to the economy
29. Support for boats at Thorpe Island.

TRANSPORT AND COMMUNICATIONS INFRASTRUCTURE

Question 34

Are there any other specific strategic transport improvements the GNLP should support?

A total of 80 separate responses were made to this question. All but four respondents considered that there was a need for strategic transport improvements of one kind or another.

Summaries of specific comments

Key Themes

1. The importance (and economic potential of) **Norwich Airport** was acknowledged by a number of respondents although one questioned whether it offered genuine value for money in view of the current limited number of services.
2. The importance of **improved rail links** (particularly through enhancements and improvements to **local rail services**) was highlighted by several including *Railfuture East Anglia, East Norfolk Transport Users Association, Norwich BID, Norwich FarmShare, Norwich Green Party, Norfolk and Norwich Transport Action Group, Climate Hope Action in Norfolk* and *Norwich International Airport*, albeit that the Airport company made no reference to the expansion of the airport itself. Service improvements were sought to both local and longer distance rail services along with supporting infrastructure. Longer distance rail service enhancements were perceived to have significant economic benefits and there was support for faster and more frequent east-west rail links to Cambridge and beyond to Oxford and onward destinations, as well as the implementation of the 90-minute service to London (**Norwich 90**).
3. The need to focus investment on delivering **Bus Rapid Transit** was considered to be an absolute priority as part of a sustainable transport network (*Norwich Green Party, Norfolk and Norwich Transport Action Group* and others).
4. Improvements in the availability and frequency of regular **bus services** particularly in the rural areas was a common theme, mentioned in particular by several Parish Councils. Excessive cost, poor reliability and absence of a bus service at off peak times and in the evening were highlighted by many.
5. Deficiencies in the coverage of **Park and Ride** were also highlighted, in particular the lack of a direct service between Costessey Park and Ride and the city centre/rail station, the lack of an orbital bus route between the sites serving the suburban fringe, the need for a Park and Ride facility serving the south-east sector along the A146 (Trowse) and park and ride services north and south from Long Stratton. The need for better **connectivity and integration** between bus and rail services was mentioned by many, with scope for the establishment of multi-use transport hubs around rail stations with fast and frequent bus services and/or light rail linking rail stations with the city centre and other key destinations. The delivery of the **UEA Cross-Valley Link** between the hospital, NRP and university campus was seen by many – including the University – as a priority and an

essential link in of the sustainable transport network in the west and south west of the city.

6. Related to this, some respondents were in favour of the development of **light rail and/or tram systems** linking destinations such as Norwich Rail Station and the University, N and N hospital and Norwich Research Park, also potentially linking the Bittern Line to the northern suburbs, with one respondent mentioning potential for reinstating a light rail line along Marriott's Way. Completion of the "round Norfolk" (Norfolk Orbital) rail line by extension of the mid-Norfolk Railway to Fakenham and Holt was seen as desirable (*Salhouse Parish Council, Railfuture East Anglia* and others).
7. The development of **new rail stations** (in particular a new station or stations on the Bittern Line serving Broadland Business Park/Postwick Park and Ride, Dussindale and Rackheath), others located on the main London line between Norwich and Diss to serve growth along the A140 and in the Hethersett/Wymondham areas to serve potential growth associated with the Cambridge-Norwich Tech Corridor, including suggestions for new stations at Hethersett and Cringleford, and potential for significant improvements to Spooner Row (the last suggested by *Harvey and Co*). The proximity and convenience of a rail service was seen as a significant factor in locating growth.
8. There was very strong support for **increased investment in walking and cycling** with respondents arguing for establishment of, inter alia:
 - a safe and convenient cycle network serving the whole area
 - dedicated, segregated cycle routes along the Dutch model
 - safe cycle crossing points on all major roads, the NDR and the Southern Bypass
 - key improvements to cycle routes where there are deficiencies (e.g. Spixworth/Buxton Road, Plumstead Road)
 - Longer distance and more direct cycle routes to the countryside from Norwich and the fringe areas; individual improvements to the cycle network sought included a cycleway from Poringland to Crown Point and a dedicated cycle route from Norwich and suburbs to the Broads. Marriott's Way was mentioned by some as not a realistic commuting option because its routing was indirect and less convenient.
9. There was **strong opposition to further roadbuilding**, in particular from the *Norwich Green Party, NNTAG, Climate Hope Action in Norfolk, the Wensum Valley Alliance, the Norfolk Wildlife Trust* and many individual respondents, with the **Western Link** singled out in particular as a project whose impact would cause serious environmental damage, whose economic value had not been proven and should consequently be scrapped. Some argued instead for upgrading the existing B1535 between Lenwade and the A47 as a more cost effective and far less damaging solution which would be of particular benefit to HGV users.
10. Conversely, many respondents felt that **substantially improved strategic road infrastructure** was essential to support growth. Completion of the Western Link was explicitly supported by *Costessey Town Council, Poringland Parish Council* and *Norwich International Airport*. Other key priorities mentioned were **dualling of the remainder of the A47** including the **Acle Straight** and junction improvements such as at **Longwater**, further improvements to the **A11** and its junctions to improve safety, need for improvements to the **A146** to alleviate congestion in the SE sector, upgrading to trunk road status and dualling of the **A140** from Norwich to Ipswich in total or in part, often seen as an essential prerequisite to new development (*Scole Parish Council, Diss and*

*District Neighbourhood Plan Steering Group, Tivetshall Parish Council and others) and exploiting the further potential of the **A143** between Diss and Great Yarmouth as a means to take pressure off the A140/A47 route via Norwich (*Diss and District Neighbourhood Plan Steering Group, Suffolk County Council*). Upgrading of the **Outer Ring Road** particularly around Sweet Briar Road was supported by *Poringland Parish Council*.*

11. Several respondents mentioned the need to enhance and improve the **radial routes into Norwich** from the outlying suburbs and villages (“the spokes of the wheel”) in particular to increase their safety for cyclists and accessibility and usability for public transport.
12. The *New Anglia LEP* considered that there was a need for longer term future changes in transportation to be more fully addressed in the plan; to this end, a reference was needed in the document to that organisation’s **Integrated Transport Strategy**.

DRAFT

Question 35

Are there other measures that the GNLP can promote to support improved sustainable transport and broadband and mobile networks across the plan area?

A total of 70 separate responses were received to this question. All but 5 respondents considered that there was a need for other measures to support sustainable transport and/or broadband

About 90% of respondents agreed that there were other things that the plan could do to promote sustainable transport. Delivery of infrastructure to support sustainable transport was felt to be important and needed to be provided early in development of a site. The infrastructure had to be meaningful and not piecemeal.

Summaries of specific comments

Key Themes

1. A common theme in relation to sustainable transport policy was that “**encouragement is not enough**”. Securing a **meaningful reduction in the use of the private car** should be an overarching objective informing all policies of the GNLP (reflecting national policy objectives) not just the subject of a single transport policy. The *Norwich Green Party* and others felt that policies and programmes promoting a significant modal shift and strict adherence to the mode hierarchy were imperative in order to have any chance of meeting carbon reduction and emissions targets set by the Committee on Climate Change (which would require a 44% reduction in emissions by 2030 compared with 2016 levels). The measures that the GNLP implemented to help secure a reduction in these emissions needed systematic monitoring with clear, measurable targets.
2. There is an urgent need to actively invest in quality and quantity of **public transport** options and links including light rail, rural service improvements (with dial-a-ride), disabled-accessible buses cheaper and subsidised services and cleaner technologies (EV). Several respondents felt cleaner public transport was overdue as Norwich was regularly failing to meet its air pollution targets and air pollution in the city as a general issue needed addressing urgently. There were also calls for enhanced **Park and Ride** (with a site serving the south east sector at Trowse) and better cross city and orbital bus routes linking existing park and ride sites and key destinations.
3. Completion of the **Bus Rapid Transit** network was seen by many as a top priority. The *Norwich Green Party, Norfolk and Norwich Transport Action Group* and others highlighted that investment in BRT had been too slow and inadequate (albeit that improvements delivered so far to the A11 corridor and along Dereham Road were generally well received). Much more needed to be done than the rather “ineffective” measures so far implemented, to ensure buses were able to make better use of radial roads to deliver fast and frequent services and so present a genuine alternative to the car.
4. There was widespread **scepticism around the effectiveness of existing policy** in the JCS which seeks to prioritise sustainable transport when the County Council as local highway authority was evidently concentrating all its resources on environmentally damaging roadbuilding and road widening, with particular criticism levelled at the NDR. Several respondents expressed frustration that the package of sustainable transport measures

promised alongside the NDR had failed to materialise with barely any such measures evident outside Norwich. There was a common perception that too many developments were still being approved in locations remote from services and this would lead to increased dependence on the car. The *Norwich Green Party* in particular pressed for the GNLP to only allocate development sites in locations which could be reached on foot or by public transport, initiating a 600+ signature [petition](#) to that effect.

5. There was a need for **masterplanning of infrastructure** to ensure coordination and connectivity between development sites and growth locations. One respondent asked that deadlines should be imposed on infrastructure providers to speed up delivery. Related to this there was support for locating work opportunities close to housing on primary bus and rail routes to reduce commuting distances.
6. Increased support needed for **walking and cycling** including safer routes and segregation from other traffic to encourage greater cycle usage. Strict requirements should be imposed on developers to make sure this was prioritised. This included investment to encourage more commuting to and from work by bike (not just focusing on routes like Marriott's Way, perceived to be chiefly recreational, indirect and not ideal for commuting). This has the potential to deliver substantial savings by reducing the need for roadbuilding. Improvements in the city centre for cyclists and pedestrians were generally supported, with some caveats, such as the use of "shared space" for pedestrians and cyclists, felt to be hazardous. Parts of the walking and cycling network were seen as deficient, particularly to the south and south-east of Norwich where the lack of routes was put down to historical factors with the predominance of large landowners discouraging public access to their land.
The ongoing **Norwich pedalways project** garnered mixed views. Some elements were welcomed, in particular the cycle priority measures along Newmarket Road, but others were less well received, one respondent considering that the works in The Avenues area had actually worsened the situation. These mistakes needed to be rectified and not repeated.
7. Improved **broadband speed and coverage**, particularly in the rural areas, was seen as a priority by many, although one respondent felt that this would not in itself reduce the need for commuting in the context of a growing population.
8. Societal changes brought about by new working practices (such as the gig economy, more widespread home working, the common adoption of online shopping) resulted in a call for flexibility so that the plan was better able to respond to **technological innovation** - such as providing for deliveries of goods and services by **drone**, instituting "drone corridors" etc.
9. As noted in the response to other questions, there was a widespread call for better **integration of bus and rail services** including improved parking at transport hubs.
10. Agents acting for developers and landowners made a significant number of representations focusing on how **development in specific locations promoted by their clients** could secure significant improvements to transport and communications infrastructure that could not be delivered piecemeal. This included support for the various garden village and new settlement proposals, promotion of a cross valley sustainable transport link as part of growth strategy for the UEA, NRP and N and N Hospital, and promotion of larger scale development in rural settlements potentially acting as a stimulus to improve rural public transport services.

Specific Bodies and Organisations made the following comments:

1. *Costessey Town Council* - Transport: Maximise bus circulation through new residential areas e.g. Lodge Farm. Improve cross radial connectivity through the city and to the hospital. Buses should be “disabled friendly”. Broadband: Should be a requirement that all new developments should have faster fibre optic broadband installed as standard from the outset.
2. *Norwich Green Party* - Simeon Jackson (an elected councillor at the time of the consultation) has submitted a petition to support the Green Party's response to this question ... The below extract from the petition text is particularly relevant to this question.
“... There is only one option for Transport within the consultation document: to “Broadly continue the current approach”. We believe there should be another option which focuses on reducing the need to travel long distances, by taking a spatial strategy approach where services are accessible on foot. Where journeys are needed that cannot be made on foot or by bike, public transport options should always be available. The plan should support strategic public transport improvements (Question 34 in the consultation) including a Bus Rapid Transit network, better access to rail stations and even opening new rail stations”.
3. *Bidwells on behalf of UEA Estates and Buildings* acknowledge the paramount importance of infrastructure and its timely delivery to support existing communities and facilitate economic growth including in the high productivity sectors, allied to improved connectivity to allow access to economic and social opportunities. The success of the Norwich Research Park as a strategic employment location, together with the UEA and Norfolk and Norwich University Hospital (NNUH) is critical in delivering a significant element growth and associated infrastructure. The construction of the long-proposed sustainable transport corridor and dedicated **Cross Valley Link** bus route between the **Research Park, NNUH, the independent research establishments in Colney Lane and the UEA campus** would bring substantial benefits and accordingly should be explicitly supported in the GNLP. Such a link would relieve pressure on the existing road network, reduce emissions, reduce total bus journey times and distances (by up to 55.000 bus km/year) and increase road capacity by removing the need for the present indirect circuitous double tracked bus route returning through the campus. Travel demand between the hospital, the NRP, the UEA and the city centre has increased markedly since the hospital opened in 2002. The benefits of a direct link are consequently endorsed in the UEA’s 2006 Travel Plan and South Norfolk Council’s 2009 NRP Development Framework SPD (q.v.). The continued strategic expansion of the UEA, Research Park and research institutes including the recently completed Quadram Institute, underlines the need for the link. The establishment of such sustainable transport corridors that facilitate walking and cycling and the use of ultra-low-emission vehicles is strongly encouraged by national policy in the NPPF.
4. *Lanpro Services Ltd on behalf of Glavenhill Strategic Land* - The promotion of smarter travel and smart technologies will be integral to the proposed new Garden Village [at Hethel], encouraging, promoting and facilitating smarter travel options and modes. To facilitate this a comprehensive green infrastructure network facilitating walking and cycling and potential AV’s will be explored providing connectivity within and around the development but also connecting to Hethel Engineering Centre and Wymondham.

To promote and facilitate smarter choices, early development with BT Openreach will be undertaken to ensure broadband and communication networks and requirements are integral to the early phases of the development.

5. *The Diss and District Neighbourhood Plan Steering Group* support increased provision of cycleways and footpaths between nearby settlements and towns as more direct and safer routes than as present where they are alongside roads without footways. Need for alternative means of delivering ultra-high speed broadband (i.e. ultra-fast fibre to premises) than will result under the present arrangements with BT/Openreach. Ensure full 5G coverage across the entire plan area. These views were echoed by *Scole Parish Council*.
6. *New Anglia LEP* suggest more emphasis be put on both digital and sustainable transport connectivity as they offer significant opportunity to the GNLP.
7. *Wensum Valley Alliance* strongly support the objective of sustainable transport as stated in point 6.42 and the need to reduce reliance on the private car in favour of public transport, cycling and walking. Investment should be focused on achieving this objective and should include:
 - Improved delivery of bus rapid transport.
 - A "clean" orbital bus route with no offsets to make transit times unreasonable.
 - Clearly defined and safe cycling and walking routes on all radial routes
 - A rail stop from Broadland Business Park and consideration of further rail halts on existing lines into the City.
8. *Norwich FarmShare*
 - a) **Question the effectiveness** of a policy positively promoting sustainable travel choices - transport emissions are rising or stagnating and there is still an overwhelming dependence on the private car, encouraged by the county's "obsession with road schemes". Need for the GNLP to consider why there is such a disconnect between policy aims and outcomes, otherwise this will continue. Every policy and proposal should be tested against its ability to reduce the need to travel and reliance on the private car; proposals that fail this test should be rejected. [This approach] would rule out the clearly unreasonable options to disperse growth rural areas (options 4, 5 and 6) and dismantle the settlement hierarchy, resulting in massive unsustainable growth in areas where people have little choice but to drive.
 - b) **Welcome recent investment in cycling** but question the effectiveness of some schemes and argue that in some cases a poor prior situation has been worsened (e.g. the Avenues), although segregated cycle lanes on Newmarket Road and Magdalen Road are excellent. It is considered that future schemes should **avoid cycle-pedestrian shared space** within the city as far as possible. Furthermore the cycle network often fails to take account of the fact that people don't necessarily follow designated pedalway routes: Heath Road/Edward Street cited as an example where an expectation of usage on a certain route may not be reflected in reality. Better to focus on specific problem areas (e.g. cyclists using the pavement on St Augustine's Street or the lack of a cycle route from there to Marriott's Way) and finding solutions to those, rather than fixating on certain routes.
 - c) Are concerned at the **number of schemes being approved despite not providing required levels of cycle parking provision**. If the current policy is unrealistic in

some locations/types of development, it needs to be tweaked, not ignored, otherwise it becomes worthless.

- d) Feel that **addressing the issue of air pollution** in the city will also help make cycling and walking more attractive.
9. *Norwich Business Improvement District* consider it necessary to have a positive policy on non-car transport improvements and improved broadband connectivity. However while understanding the rationale to support full modal transport options it considers a policy that discriminates against car use essential for the workforce and the economic health of the city to be unacceptable. We cannot support positive policy on “no-car transport”.
10. *Norwich Green Party* presented a number of detailed arguments in their submission, as follows
- Current policy to improve public transport and walking and cycling infrastructure to reduce reliance on the private car is contradicted by the county council’s focusing the majority of investment on the road-building and road-widening. The current approach will result in increased transport emissions while failing to promote significant modal shift. This must be seen in the context of the latest report from the Committee on Climate Change which states that to meet the fourth and fifth carbon budgets, the transport sector requires a 44% reduction in emissions below 2016 levels by 2030. Transport policy should be in line with emissions reduction targets based on the UK carbon budgets, and schemes which are not in line with those targets should be rejected. (See also our response to Q. 50 on climate change).
 - The top transport priority should be to drastically improve the quality of public transport. In particular, priority should be given to delivery of the BRT network promised in NATS and the JCS (see also our response to Q. 34). The policy should also clearly set out a commitment to ultra-low-emission buses and rail electrification. Government funding for such measures will be extremely hard to come by without a clear policy commitment and strategy for delivering them.
 - More widely, the policy needs to take account of technological changes such as a likely shift to electric vehicles (EV), and prepare for the infrastructure required. EVs have a significant role to play in improving air quality and potentially in reducing emissions (if accompanied by major investment in renewable energy), but this cannot simply be assumed – for example, electric vehicles will not be widely used without a reliable network of charging points.
 - Other societal changes such as home working, the gig economy and online shopping are having a significant effect on transport use patterns, and will continue to do so. There is also evidence that younger people are moving away from car ownership. The policy must take these trends into account and consider the implications for transport planning. For example, consideration should be given to how planning can deal with the rise in van deliveries and the impact it is having on emissions and air quality – such as by supporting the creation of a delivery depot on the edge of the city that would enable ‘last mile’ cycle courier deliveries.
 - We welcome the recent investment in cycling. Though the resulting schemes have been of mixed quality, there has been a significant increase in cycling in the city, which shows the value of investing in active transport. It should always be borne in mind, however, that a bad scheme can be worse than no scheme, both in terms of safety and of public perceptions of cycling.

- The JCS ‘makes the right noises’ on walking and cycling, but in order to deliver on its aims, the new policy should adhere strictly to the mode hierarchy so that active travel and public transport are always prioritised above private cars. Otherwise, the current pattern of one step forward (spending on cycling), many steps back (tens of millions of pounds for new roads) will continue.
11. *Norfolk and Norwich Transport Action Group* - Highest priority must be given to the delivery of a comprehensive high quality public transport network, together with a supporting package of sustainable transport measures. Such a package was promised in the JCS 2011 and whilst some measures have been implemented, most of the BRT network has not. Of the six cross-city routes, 3 sections of BRT along Dereham Road and bus infrastructure along Newmarket Road have been developed, but that is all and we are halfway through the JCS plan period.
- Continuing the current approach to encourage public transport improvements, walking and cycling improvements.....” is insufficient; rather the strategy should include:
- Pro-active delivery of BRT (high quality public transport network) and not just 'encouragement'.
 - A comprehensive, high quality public transport network utilising powers under the 2017 Bus Services Act and not simply 'public transport improvements.'
 - The DfT's Transforming Cities Fund provides a big opportunity to submit a funding application for public transport infrastructure and supporting measures.

The lack of delivery is serious:

- In the absence of delivery of the complete package of sustainable transport measures [alongside the NDR], it is highly likely that many car users will choose to drive with the result that the newly-released road space will start to fill up unless reallocated to sustainable modes. Once unsustainable travel habits become entrenched it becomes much harder to change them.
- The JCS AMR shows that the percentage of journeys to work by private car has increased in Norwich, Broadland and South Norfolk between 2001 and 2011.
- the JCS allocates a significant number of new strategic employment and housing sites around the periphery of Norwich with a continuing trend of city centre employment relocating to peripheral sites on the edge of Norwich such as Broadland Business Park.
- 33% of households in Norwich do not have a car and will struggle to access jobs by bus, foot or cycle at employment areas around Norwich.
- The above picture shows the urgency of developing a high quality public transport network (or BRT) to support economic development, improve social equity and protect the environment from poor air quality and transport's rising share of carbon emissions.
- Such a network must be underpinned by a demand management package of measures for reducing road traffic levels across Greater Norwich. Through traffic has been cut in the city centre, but is growing on the periphery of Norwich. This will strain the road network inside the built up area – notably the inner ring road which is at capacity following the removal of city centre through traffic and also the radial roads which are also residential roads, several of which are forecast to see additional traffic as a result of the NDR and Postwick Hub.

- The transport strategy approach advocated by NNTAG at the NDR examination is even more pertinent than hitherto especially given the failure of transport to stem and reverse rising carbon emissions.
- It involves the appraisal and implementation of a large combined sustainable transport package aimed at bringing down traffic growth and enabling modal shift sufficiently for enabling other investments in infrastructure and operations to make travel conditions better than the current situation, using measures which themselves have some benefit.
- Such a package of policies would involve a combination of measures such as travel planning, pricing, re-allocation of road capacity, land use planning and so on.
- These steps create a new trend line, against which different combinations of infrastructure, operations and management can be tested, all with a chance of delivering improvements. The planning task involves searching for the best combination.

Examples of demand management measures could include:

- Uniform parking standards for employment, retail and other major traffic generators across Greater Norwich. In this way, developments on greenfield sites would not secure a parking advantage over the city centre.
- the traffic-neutral strategy approach for major housing development at North Sprowston and Old Catton whereby measures are adopted so that one car journey is removed from the road network for every new car journey generated by the development.
- Although NATS includes various travel planning measures, we consider that a much strengthened package is required to enable people to make bus, local rail, walk and cycle their first choice. Norwich has achieved excellent take up of city car club vehicles, but we should now be looking to dramatically increase car club vehicles so that people do not have to own a car which would chime with travel trends.
- As mentioned in our response to Q34, transport is undergoing a transformation and we are entering a different landscape. Potential changes for consideration are listed in 'Longer term NATS measures up to 2032' (section 6) of Norfolk County Council's 'Requirement 31: NATS Complementary Measures' (Aug 2017), which has been produced in discharge of the NDR DCO. The review of the Transport Strategy for Norwich review provides scope for assessing their potential. We hope that the GNLP will take an innovative approach.

An alternatives package would:

- Provide for growth
- Protect local communities from the effects of traffic
- Meet environmental, social and health objectives
- protect the city centre – not only retail base but also leisure, employment and visitor hospitality services
- Support regeneration of run down parts of the city
- Protect the economies of market towns.

12. *Thorpe St Andrew Town Council* argue for a more flexible approach from communities to accept infrastructure is required. Improvements to broadband, mobile phone networks and electricity supply all require infrastructure which may impact on landscape, but these projects should continue.
13. *Cringleford Parish Council* - support including facilities for ultra-low emission vehicles in line with NPPF section 4. The GNLP would benefit from more strongly encouraging the widespread installation of electric vehicle (EV) charge points and associated network improvements. EV friendly policies could include, such as subsidised parking rates, in addition to promotion of car sharing where possible ((continuing the successful pilot in Norwich) success to date).
14. *Kimberley and Carleton Forehoe Parish Council* suggest that all 'village groups' without superfast broadband connectivity should be excluded from this development plan. Developing in these areas would be inappropriate without this infrastructure in place first. Improvement of the broadband infrastructure is imperative, and not enough has been done for the rural areas.
15. On a similar theme *Tivetshall Parish Council* gave specific support to B4RN – the East Anglia Community Broadband Project.
16. Norwich Cycling Campaign - not enough emphasis on "sustainability". "Improve connectivity" is too vague a phrase to meet the National Planning Policy Guidance presumption for "sustainable" growth. We support the inclusion of a policy which commits to sustainable and healthy travel issues within the Local Plan
17. *Reepham Town Council, Salhouse and Brundall Parish Councils* and *NHS Norwich CCG* support continuing option TRA1 with particular emphasis on improving mobile phone connectivity and improving public transport. NHS health and care partners support option TRA1 and would fully support a better, faster and more comprehensive broadband network to support the delivery of health services, such as mobile working and virtual patient appointments.
18. *Climate Hope Action in Norfolk* comment as follows:
 - Incentivising active transport use and low carbon public transport and de-incentivising private car use should be an urgent priority [of the plan]. Existing public transport needs urgent prioritization and wide-ranging improvements. Rural routes are being lost and fares are prohibitively expensive. Limited opportunities for transport through the evenings, which is not compatible with increasing trends for flexible and shift working; limited options for users to purchase bus passes usable on different companies' services, or multiuse tickets which can be used over a flexible period. Addressing these issues would provide incentives for encouraging public transport use. Mechanisms for funding and subsidising these options require exploration.
 - A complementary approach to disincentivise private car use should also be explored with a possible. This might include a car levy in the city centre and tolling on certain routes. Revenue raised could be used to improve public transport and cycling / walking infrastructure.
 - Improved rail services between Norfolk towns and Norwich would create substantial new possibilities for less carbon intensive scenarios, as well as supporting the Cambridge tech corridor. Supporting sectors such as green technology, public transport and energy efficiency etc. offers huge potential for new employment in the area.

- Affordable, excellent public transport provision is an essential requirement if you want to support the rural economy, thriving communities and deliver low carbon growth. This would support young people in these communities as well as the county's aging population who may wish to remain in rural areas – All sections of the community, including those at an economic disadvantage would benefit from subsidized, comprehensive and reliable public transport.
 - To support the switch to EVs where private car use is essential, a more active approach to providing a reliable network of rapid charging points and support for individuals to install home based charging points would be welcomed.
 - CHAIN welcomes the GNLP's commitment to improved broadband, which is essential for businesses and home working. It would also open up opportunities for virtual conferencing and virtual health care consultations.
19. *Railfuture East Anglia* - would like to see improved integration of journeys to and from stations for rail users. In particular:
- Extension of real time information for buses to all principal stops in Norwich and in Norwich station itself. Proper functioning of system to show real time information for all services shown on indicator so bus users are left in no doubt as to whether service is running or not
 - Better promotion of Plus Bus day tickets and season tickets in Norwich and other towns
 - More accountability by bus companies to local authorities over late running or cancelled services
 - Development of the BRT network as projected in NATS
 - Introduction of electric or other non-polluting buses to improve air quality
 - Particular attention given to the Norwich station–City Centre–UEA–Hospital–Research Park–Thickthorn Park and ride axis, and the increasing volume of passengers using buses on sections of this route. Consider feasibility in the longer term of tram operation given new lower cost options of laying tracks without disrupting services and battery powered trams for route sections.
 - Site specific requirements for new developments throughout the GNLP area including improvements to local public transport, including all day bus links to the nearest strategic station and contributions towards station improvements or new stations.
 - Major new developments including 'hold points' so that further development cannot take place until any required new transport infrastructure is in place.
20. *Poringland Parish Council* cycleways isolated from highways. Current approach is inadequate.
21. *Framingham Earl Parish Council* As many of the broadband and mobile services are provided by commercial enterprises, they need to have incentives to put in the better infrastructure required.
22. *Historic England* -supports the provision of sustainable transport and telecommunications networks.
- Re transport: A number of major transport infrastructure projects and options are discussed within the consultation document. These are large projects, the details of which cannot be adequately considered here. We support a cross boundary strategic level consideration of transport infrastructure and look forward to being involved in specific proposals as they progress. We do not have a preference for any transport

growth option at present until further information and analysis has been carried out with regards to potential heritage impacts. We are keen to ensure that growth and development conserves and enhances the significance of Greater Norwich's heritage assets. All proposed infrastructure schemes and route options should take into consideration their impacts on heritage assets and their setting alongside archaeological potential. New roads, cycle paths and associated infrastructure ...will result in impacts on landscape and townscape as such Historic England would want to be reassured that matters of siting, location and design will conserve the historic environment of the area. Therefore, it is important to ensure that transport appraisals properly assess all potential impacts on the historic environment to an appropriate level of detail. We have not considered archaeological issues in this response but would refer you to the HER held by the County Council who should be able to advise in this regard. Consideration should be given to the impact of the proposals upon the setting of both the designated and non-designated assets together with the potential for unknown archaeology. We would recommend that an assessment of impacts upon townscape, historic landscape and historic assets is included in any future assessment of route and infrastructure options.

- Re Telecommunications: Advanced, high quality communications infrastructure is essential for sustainable growth. The development of high speed broadband technology and other communications networks also play a vital role in enhancing provision of local community facilities and services. However, the siting and location of telecommunications equipment can affect the appearance of the public realm, street scene, the historic environment and wider landscapes. The consideration of their positioning is therefore important, particularly in conservation areas. ... Crucially, the NPPF identifies the protection and enhancement of the historic environment as being a key strand in what it defines sustainable development (paragraph 7). We would therefore urge the emerging Local Plan, to ensure that any telecommunications policies include a provision for the protection of the historic environment and a requirement for applicants to consider the siting, design and positioning of equipment in this context. Telecommunications policies should have regard to the wider townscape and historic environment.
23. *Pigeon Investment Management Ltd and John Long Planning on behalf of their respective clients* - suggest that the GNLP could include more flexible general policies for permitting telecommunications equipment, and identify telecommunications 'not spots' at which even more flexible policies for telecommunications equipment would apply. *Pigeon* add that site proposals that offer new opportunities for public walking/cycling routes and recreational opportunities through the provision of open space should be encouraged.
24. *Savills on behalf of clients* - Residential growth in rural settlements could increase demand for sustainable modes of transport such as bus services. Development in the rural area would act as an opportunity to encourage utility providers to update and improve.

DESIGN

Question 36 - Which approach do you support for promoting good design of new development?

Option DE1: Broadly continue with the existing design and density policy approaches, with some relatively minor changes and updating, covering general high-quality design, recognising local character, encouraging walking and cycling etc.

Option DE2: Create a stronger policy approach to design and density, including giving a clear policy approach to higher-density development in appropriate locations or scenarios.

A total of 82 separate responses were received to this question. 30 respondents supported Option DE1; 43 respondents supported Option DE2 and nine favoured other approaches.

Summaries of specific comments

Option DE1 was supported by *Reepham* and *Thorpe St Andrew Town Councils* and *Hainford, Hellesdon, Scole, Tivetshall* and *Great and Little Plumstead Parish Councils*. *Historic England NHS Norwich CCG, Persimmon Homes (with caveats), Pigeon Investment Management Ltd; Lanpro Services Ltd* representing *Nigel Hannant*, *Glavenhill Strategic Land, Dennis Jeans Properties, Silfield Limited, and the promoters of sites GNLPO487 and GNL1054; John Long Planning* representing *Otley Properties; CODE Development Planners* representing *Drayton Farms Ltd, Ben Burgess Ltd and Bullen Developments* (considering however that the GNL1054 is not the appropriate mechanism by which to introduce detailed design policies, these being more appropriate to development management (DM) policies local plans which the GNL1054 does not propose to change.

1. *Reepham Town Council* was of the opinion that building density for new developments should be in keeping with the existing built environment and would oppose higher density development in long established settlements like Reepham.
2. While supporting option DE1, *Scole Parish Council* considered that either approach could be acceptable, adding that rural housing density should not be the same as urban or suburban developments where higher densities have been the norm. There is little or no public transport, especially at weekends (unlike urban areas), so motor vehicles are the only reasonable mode of transport. There could be greater density for specific project such as a “retirement village” where residents would not need parking spaces except for visitors and a large garden space could be integrated for family/resident use.
3. *Great and Little Plumstead Parish Council* considered that current policies should be upheld first. If adopting DE2 would enable this to be sustained to a greater level than is visible at the moment, then the policies to maintain design quality, space standards, policies for public open space, and to improve and enhance the environment should be reinforced.
4. *Thorpe St Andrew Town Council* commented that a Scandinavian approach to design could be supported by the use of well-designed 4-5 storey buildings with communal public and amenity space.

5. *Historic England* – Option DE1 [will secure] a high quality design approach which responds to local distinctiveness and seeks to reinforce local character is encouraged; this should benefit the historic environment. The mass, scale, siting, position and detailed design of development should be appropriate for its location. Development should preserve the character and seek to enhance the setting of conservation areas.
6. *NHS Norwich CCG* - Option DE1 supports healthy living and wellbeing among the population.
7. *Persimmon Homes* will support policies that clarify where higher density development may be acceptable to make efficient use of land but give no support for overly prescriptive design policies, as design should be considered on a site by site basis dependent on the characteristics of the site and surrounding area. Also [we do not support] the introduction of residential space standards for either market or affordable dwellings as these would worsen affordability issues and reduce the overall number of homes delivered. Wheelchair accessible dwellings should not be a standard requirement and should be based on an assessment of local need with regard to viability.
8. *Pigeon Investment Management Ltd* - the ‘business as usual’/current approach to design is more appropriate than a more prescriptive approach to design and density, although there should be greater flexibility to provide for high density development in appropriate locations, for instance to reflect local character or to maximise opportunities for sustainable travel, close to public transport interchanges
9. *Lanpro Services Ltd* (on behalf of clients) – Option DE1 to broadly continue with the existing design and density policy approaches with some relatively minor changes and updating is appropriate at this time. The NPPF will support good design. Setting more prescriptive design and density policies is likely to be difficult to achieve across such a large and diverse area and should be approached with caution. A broad policy is more appropriate and that individual site allocation policies could set more prescriptive site-specific requirements if relevant. This would then be supported by DM DPD in each of the Districts and the City.
10. *Otley Properties/John Long Planning* - the ‘business as usual’/current approach to design is *more* appropriate than a more prescriptive approach to design and density.
11. *CODE Development Planners Ltd* - It is essential that planning policy is not so prescriptive it removes the flexibility and design opportunities for developers, architects, urban designers, landscape architects and development management teams to address innovative specific site related design issues. The GNLP is not the appropriate process or plan in which to introduce design and development management policies. According to paragraph 1.25 of the Growth Options document, the GNLP will not amend existing adopted Development Management policies.

Other comments

12. Opposition to higher density building for new developments as it is neither in keeping and has negative outcomes on mental health.
13. It is essential that planning policy is not so prescriptive it removes the flexibility and design opportunities for development to address innovative specific site related design issues.

Option DE2 was supported by *Costessey and Thorpe St Andrew Town Councils and Brundall, Poringland, Bramerton, Colney, Drayton, Framingham Earl, Barford, Burstn and Shimpling,*

Cringleford, Kimberley and Carleton Forehoe, Salhouse and Wrampingham Parish Councils as well as the Diss and District Neighbourhood Plan Steering Group. Climate Hope Action in Norfolk, CPRE Norfolk, the Wensum Valley Alliance, Norwich Green Party,

14. *Costessey Town Council* mentioned the need to maximise bus circulation through new residential areas e.g. Lodge Farm; improve cross radial connectivity through the city and to the hospital, require “disabled friendly” design in buses, faster fibre optic broadband should be a requirement in all new developments as standard. 40 dwellings per hectare was considered too high a density and leads to lack of social cohesion and to disharmony when density is too high. The policy should be cross referenced with South Norfolk Council’s Place-Making Guide.
15. *Bramerton Parish Council* highlighted a need (a) to avoid loss of character through the provision of ubiquitous housing types and (b) to ensure there is a diverse range of accommodation on offer from single persons to large and extended families and to allow provision for care facilities within the community.
16. *Colney Parish Council* argued for future housing and commercial property design which ensures high levels of renewable energy use *and* water use efficiencies geared to 25% of current use of energy and 50% of current use of fresh water by 2025 (well beyond the Merton Rule)
17. *Drayton Parish Council* considered that extra weight should be given to areas with neighbourhood plans.
18. *Framingham Earl Parish Council* cautioned that care should be taken where higher density is identified to avoid producing crowded cluttered developments. Good design which is in keeping with the surroundings should be a priority, which appears to be what most buyers want.
19. *Barford Parish Council* felt that new developments in villages should reflect the current density already in a village to ensure that new housing blends into the current environment allowing the village to keep its look and feel.
20. *Burston and Shimpling Parish Council* - the density of housing needs to suit the location of the site. A greater density would be more appropriate in a town than in a village location. Parking needs to be adequate. In the countryside a vehicle is essential, and if there are three or four adults in a house, then often there are three or four cars. There should be at least one off-street parking space for each bedroom, plus one.
21. *Cringleford Parish Council* - strengthened density policies are essential for settlements to maintain their character and reduce the environmental impact of future development also include reference to the use of renewable and distributed energy generation where possible.
22. *Kimberley and Carleton Forehoe Parish Council* – support option DE2 if it leads the building of flats, bungalows and small houses for young people and the older generation.
23. *Salhouse Parish Council* - support option DE2 because it is a more specific policy.
24. *Wrampingham Parish Council* support option DE2 because it gives a stronger policy approach to design and density. New developments in villages should reflect the current density already in a village to ensure that new housing blends into the current environment allowing the village to keep its look and feel.
25. *Diss and District Neighbourhood Plan Steering Group* - South Norfolk Council benefits from a Place Making Guide (SPD). Traditional designs and styles vary across a District or

City and exhibit quite different characteristics, the policy approach should allow for these whilst also providing for novel designs that suit a site, setting or context which may also be particularly appropriate for self-build and custom build. We recognise the importance of good design for building, living and working and for the improved quality of life that result from a positive surrounding environment. It will aspire to promote the full scope and benefits of quality in design and may propose specific policies to ensure this. Such policies may be specific to locations and may specify minimum standards for open spaces surrounding buildings, overall density, car parking, wildlife corridors and so on appropriate to housing need, type and tenure in individual settlements.

26. *Climate Hope Action In Norfolk* - Design is crucial in reducing the carbon emission and other pollutants associated with new developments. This in itself is vital for public health going forward as climate change is considered by the World Health Organization as the greatest threat to public health. Furthermore good design can directly promote public health via physical and mental wellbeing for the individual and reducing impact on community services. Given this CHAIN would propose a stronger policy on design and density to ensure new developments are truly sustainable in terms of:
 - creating a large proportion of their own energy,
 - building to reduce energy usage, particularly for heating and cooling (which will become a major issue as the climate continues to warm with increased frequency and intensity of heat waves),
 - mandatory provision of green spaces,
 - Mandatory access to safe cycling and walking routes and provision of public transport links.
27. *CPRE Norfolk* - Would give opportunities for identifying areas suitable for higher-density development. This would identify appropriate sites for this type of development which would lead to less land needing to be released for housing.
28. *Wensum Valley Alliance* - support Option DE2 because without stronger policies the amount and scale of the developments proposed will allow inferior product to be provided.
29. *Norwich Green Party* - Option DE2 is supported particularly to introduce walkability of developments and access to public transport is considered (through Building for Life) and so that higher-density development can be encouraged, but in a form appropriate to its particular setting. High volume developments do not reflect local style or density and stand out as extant estate developments which are alien to existing city or village street patterns. Good examples do exist and fit well with their surroundings. These tend to be smaller scale developers. The GNLP needs to reflect this approach which will provide 21st century legacy housing.

Other comments

30. The present policy has allowed poor quality developments to be built in regard to design, finished product, street furniture, footpaths etc.
31. Higher densities and higher specifications should be an essential element of creating a city adapted for the needs of society under a much lower carbon emissions structure as will increasingly be the case.
32. Higher density developments are not suitable for the rural areas.

33. Design should at least make some attempt to fit into the local vernacular where appropriate, there are plenty of examples of good design which can be copied. There is no excuse for poor design and local authorities should be able to insist on this.
34. The demographics, particularly ageing population dictate higher density. Also incentives to reduce under occupation will release existing low density housing. Is there a definition of "high quality design"? Put walking, cycling, disabled, prams first. More kiddies' play areas.
35. Current layout of new housing developments is inappropriate. It should be possible to build houses on more of a grid, so the development is more attractive, and good use is made of the land.
36. The existing approach is not strong enough to deliver quality or balance it against quantity.
37. New measures are needed to ensure that infrastructure for safe walking and access to public transport are taken into account in all new developments.
38. There should be a stronger policy on design, and this one focuses on 'walkability' in all planning decisions. Figures for maximum density and maximum building height should be set.
39. Encourage high-density urban development that is appropriate for the relevant area. A maximum height for buildings should be set in different areas.
40. The policy should adopt the updated 'Building for Life' criteria. In particular, walkability and access to public transport should be covered. Designing for resilience through use of flood-resistant materials, green SuDS, energy efficiency etc. should also be encouraged where it cannot be required.
41. Social housing is pushed into easily visible blocks with lower quality finishes and fascias. South Norfolk District Council's insisting upon all gable ended buildings has resulted in monotonous development style. We have had edgy developments in the village such as the upside down house in Springfields [Poringland]. I see no opportunities for such innovative design with the multiple house builders.
42. It should be stated that certain areas should have an appropriate density match, e.g. in service villages. Residential space standards are an essential as is disability geared housing.
43. Maximise focus on Norwich City centre
44. Option DE2 will encourage a stronger approach to design. I generally disagree with the principle of densification. Density should be contextually appropriate.
45. Plans:
 - Should maximise natural light (rationale: good natural light will reduce need to use electricity)
 - Should maximise use of solar gain for heating or passive solar cooling? (again, reduces need for electric / fossil fuels)
 - Could include solar panels as standard
 - Should allow for residents in a building to safely store a bicycle
 - should include storage for waste recycling
46. Design and placement of the building should minimise noise pollution emanating from and received into the building
47. Design should minimise light pollution emanating from and received into the building
48. The GNLP is not the appropriate process or plan in which to introduce design and development management policies. According to paragraph 1.25 of the Growth Options

document, the GNLP will not amend existing adopted Development Management policies.

49. Of those supporting **neither option**, *Bidwells on behalf of UEA Estates and Buildings* comment that within the long-term expansion of the UEA Campus and NRP, the UEA will endeavour to ensure high quality design is implemented on all new development.

DRAFT

AFFORDABLE AND SPECIAL NEEDS HOUSING

Question 37. Which approach to affordable housing thresholds do you prefer?

Option AH1 - A proportion of affordable housing would be sought on all sites of five or more dwellings or 0.4 hectares or more (as per current JCS Policy 4)

Option AH2 - A proportion of affordable housing would be sought on all sites of 11 or more dwellings (or 0.5 hectares or more).

A total of 92 separate responses were received to this question. Of those who expressed a preference, 34 supported option AH1, 50 supported option AH2 and eight supported neither option but offered a range of views on alternative approaches.

Summaries of specific comments

Of those supporting **Option AH1**, the following comments were made:

1. A number of individual and organisations, including the *UEA Student's Union* and *Hellesdon Parish Council*, stated that there is a significant need for affordable housing.
2. A small number of individuals stated that there has been an under-provision of affordable housing.
3. *Costessey Town Council* suggested that the affordable housing requirement should be a 40% maximum, with a stepped threshold for smaller sites of 20-40%. 20% should be the absolute minimum. They comment in addition that viability reports should be included at start of process to prevent land banking; affordable housing should be sprinkled across the site, not kept in a block, and affordable housing should be kept in public ownership.
4. *Norwich CCG* and an individual respondent comment that ensuring housing is accessible/adaptable should be a priority, given the ageing population.
5. A small number of individuals stated that any policy should be deliverable or that current policy is not delivering.
6. *Wramplingham, Barford and Poringland Parish Councils* and two individual respondents felt that option AH1 would maximise opportunity to provide affordable housing, including in small rural communities. This will help young people remain in the community they grew up in.
7. An individual suggested that all viability assessments for Affordable Housing should be public. It was also suggested that land value should be based on existing use value with reasonable uplift for the landowner.
8. *Kimberley and Carleton Forehoe Parish Council* suggested that the brownfield site opposite Wymondham railway station would be ideal for small starter homes. This should be encouraged before new sites are approved.

9. *Climate Hope Action in Norfolk* comment that neither approach is adequate to meet affordable housing criteria for Greater Norwich, although they do not define what criteria are being referred to.

Of those supporting **Option AH2**, the following comments were made:

1. All apart from one agent representing the interests of developers and landowners, and a small number of individual respondents preferred option AH2 as they considered it to be consistent with national policy and practice
2. A number of agents representing the interests of developers and landowners stressed that any policy should be deliverable. An individual suggested that current policy is not delivering.
3. A number of agents representing the interests of developers and landowners also suggested that any policy must allow for the full range of affordable housing types to be considered.
4. An individual respondent suggested that delivering affordable housing at lower levels can be impractical, restrictive and unsuitable for some village settings and ribbon development opportunities.
5. The *Wensum Valley Alliance* and few individuals made statement to the effect that all measures should be taken to prevent developers reducing the number of affordable housing provided on viability grounds.
6. *Thorpe St Andrew Town Council*, the *Home Builders Federation* and a small number of individuals suggested that a higher threshold would help smaller house builders
7. *Thorpe St Andrew Town Council*, *Savills* on behalf of a number of landowners and a small number of individual respondents also felt that AH2 could help encourage smaller sites and/or that a lower threshold may adversely impact the viability of small sites and might deter such sites coming forward for development.
8. A number of agents representing the interests of developers and landowners, The *Diss and District Neighbourhood Plan Steering Group* and *Hainford Parish Council* variously identified that local housing needs in different areas are different, there needs to be flexibility and that a “one size fits all” approach would not work.
9. The *Diss and District Neighbourhood Plan Steering Group* and *Scole Parish Council* expressed their concern that too many small affordable homes are being delivered in Scole. What is needed is more large properties to maintain balance.
10. One individual respondent suggested that “people should not rely on affordable housing”.

General Comments not related to a preferred policy option:

1. *Great and Little Plumstead Parish Council* stated that housebuilders meet the needs of shareholders not the community. Until the imbalance of funding for housing provided via local authorities and housing associations is addressed, the ability to provide for the “poorer” members of our community will remain unresolved. This is a national political policy which a Local Plan cannot resolve.

2. *Climate Friendly Policy and Planning* (CFPP) suggest that the use of a flat affordable housing requirement is inappropriate. A zoned approach, which accounts for differences in affordable housing need by geographical location and property type should be used as it would more effectively address need.

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Question 38

Which approach do you favour for affordable housing percentages?

Option AH3 - Seek 27% affordable housing on all sites above the qualifying threshold

Option AH4 – Seek more than 27% affordable housing on all sites above the qualifying threshold

Option AH5: Specify the affordable housing amount with the potential for phasing on certain larger sites (perhaps 100+), with a more general policy for smaller sites

A total of 87 separate responses were received to this question. Of those who expressed a preference, 25 supported option AH3, 19 supported option AH4 and 22 supported option AH5. 21 supported none of these options in isolation but offered a range of views on alternative approaches.

Summaries of specific comments

Of those supporting **Option AH3**, the following comments were made:

1. A number of respondents, including agents for landowners and developers, stressed that any policy should be deliverable. Several, including the *Norwich Green Party*, commented that the current policy is not delivering
2. A number of individuals, the *Norwich Green Party* and *Climate Friendly Policy and Planning* (CFPP) felt that house builders should not be allowed to deliver less than the policy requirement for affordable housing.
3. *CPRE Norfolk* and *Great and Little Plumstead Parish Council* felt that more government intervention is needed so that the provision of affordable housing is not connected to a private developer.
4. *CPRE Norfolk* and a small number of individual respondents supported AH3 as they felt it had the best chance of being delivered or delivering higher affordable housing numbers.
5. One individual felt that the definition of affordable housing was too wide. The greatest demand is for social and affordable rented properties. The plan should incentivise the provision of this type of affordable housing.
6. *Persimmon Homes* and *Lanpro*, on behalf of a number of landowners and developers, felt that a lower affordable housing percentage would incentive house builders to develop in Greater Norwich and increase delivery across all types of housing.
7. *Persimmon Homes*, *Carter Jonas* (on behalf of *Taylor Wimpey*), *The Home Builders Federation* and *Gladman Developments* supported increasing the total housing requirement to ensure full delivery of enough affordable homes and compensate for a lack of viability on some sites.
8. *Persimmon Homes* suggested that higher affordable housing requirements could affect the viability of some sites.
9. *NHS Norwich CCG* supported option AH3 to provide a consistent approach to health and wellbeing.

10. A number of agents, on behalf of landowners and developers, and the *Home Builders Federation* consider it important that any policy should be flexible enough to take account of site viability, phasing and changes in housing need.
11. *John Long Planning (on behalf of Otley Properties)* suggested that the policy should allow for off-site provision in the form of contributions and/or units.
12. One individual felt that the push for growth has resulted in lesser contributions being secured and pockets of unrelated poor quality development.
13. *Code Development Planners* consider that AH3 is the only option supported by evidence.

Of those supporting **Option AH4**, the following comments were made:

1. One individual felt that local authorities should return to being housebuilders.
2. A small number of respondents stressed an urgent need for affordable housing, including in rural areas.
3. One individual felt that modern methods of construction would help viability.
4. Two individual respondents implied that they supported measures to provide as much affordable housing as possible.
5. One individual preferred AH4 as closest to their view but stated that there should be a zoned approach to setting affordable housing targets based on a particular area's needs.
6. *DLBP Ltd* suggest that a higher affordable housing requirement would offset under-delivery on sites which cannot meet the 27% requirement.
7. It was suggested that the policy should make clear how viability will be assessed if a sites cannot meet the requirements of the affordable housing policy.

Of those supporting **Option AH5**, the following comments were made:

1. A small number of respondents, including the *Diss and District Neighbourhood Plan Steering Group, Scole Parish Council, Thorpe St Andrew Town Council and Hainford Parish Council* supported AH5 as they felt it could respond flexibility to local or site specific circumstances.
2. *Costessey Town Council* repeated their proposal also set out under question 37 that:
 - Affordable housing should be 40% maximum, with a stepped threshold for smaller sites of 20%-40%, but no less than 20%;
 - Viability Reports should be included at the start of the planning application process to avoid land banking.
 - Affordable housing should be sprinkled throughout a site, not kept in a block; and;
 - Affordable housing should be kept in public ownership.
3. One respondent felt that affordable housing should be concentrated where infrastructure exists.

4. A small number of respondents considered that AH5 would be the most flexible and responsive to local circumstances
5. One respondent said that facilities required by planning obligations should be delivered as early on in the development as possible.
6. *Lanpro*, on behalf of a number of landowners and developers, suggest that the figure set out in the 2017 SHMA is too low as it makes no provision for backlog over the JCS period pre-2015 or the City Deal housing numbers.
7. *Pegasus Planning Group* recommend that affordable housing requirements should be restricted to a maximum of 27% on smaller sites, with higher proportions permissible at the developer's discretion.

Of those who **did not support any of the proposed options**, the following comments were made

1. Whilst detailed approaches proposed may vary, a few respondents, including *Norwich Green Party* and *Climate Friendly Policy and Planning (CFPP)*, suggest that the approach to affordable housing needs to be based on site specific analysis and locationally specific assessment of demand and need.
2. *The Home Builders Federation* suggest that a policy of less than 27% should not be considered unreasonable. If viability shows a site can only support a lower amount then that is perfectly reasonable.
3. *The Home Builders Federation* also suggest that if sites cannot viably support 27% affordable housing the authority should increase their overall housing requirement.
4. *The Home Builders Federation* state that the affordable housing requirement should not push at the margins of what is viable.
5. Providers of older peoples' accommodation (assisted care housing, supported housing, sheltered housing and retirement housing) should be exempt from the requirement to provide affordable housing on site. Commuted contributions should only be required where it is viable to do so.
6. One respondent suggests that affordable housing needs to be near to Norwich where employment, transport and infrastructure is more easily accessed.
7. *Norwich Green Party* and *Climate Friendly Policy and Planning (CFPP)* propose that the plan should establish a standard methodology for viability assessment, including a "Benchmark Land Value" based on existing use value plus a premium.
8. *Norwich Green Party* and *Climate Friendly Policy and Planning (CFPP)* also propose that Officers should be given the necessary training to scrutinise viability assessments in house, rather than relying on the opinion of external valuers.
9. *Norwich Green Party* and *Climate Friendly Policy and Planning (CFPP)* state that there is evidence that lower levels of affordable housing actually reduce build-out rates.
10. *Lanpro*, on behalf of a number of landowners and developers, suggest that a simple policy, requiring less negotiation, is more likely to deliver affordable housing. Delivery is already at less than the 27% minimum target. A realistic target of circa 20% for all sites above the qualifying criteria would likely eliminate negotiations on

affordable housing levels in all but the most extreme cases. This would eliminate significant costs and delays in the planning process.

11. *Tetlow King*, on behalf of *Rentplus*, propose that the Councils should consider how Rent to Buy should can help support scheme viability and the provision of affordable housing.
12. *Lanpro* suggest, on behalf of several clients, that there should be a hybrid approach which allows for flexibility on large and complicated sites and a fixed percentage for smaller housing sites, where viability is easier to predict.

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Question 39

Do you support the favoured option for tenure split?

Option AH6: Require all qualifying sites to provide the SHMA-evidenced ratio of rented and low-cost home ownership housing on all sites.

A total of 65 separate responses were received to this question. Of those who expressed a preference, 36 supported the favoured option AH6 and 20 did not. 8 did not respond either Yes or No but offered a range of views on alternative approaches to the favoured one.

Summaries of specific comments

Of those **supporting** the favoured Option AH6, the following comments were made:

1. Two individual respondents and the *Norwich Green Party* suggested that there is a great need for low cost, social rented homes.
2. One individual respondent suggested that without an appropriate tenure split needs will not be met.
3. One individual respondent felt that Option AH6 was the most straightforward approach
4. *Kimberley and Carleton Forehoe Parish Council* said that there should be clauses that prevent affordable homes being bought by investors and then rented as social housing, to ensure genuine needs for local first time buyers are met and avoid estates being dominated by “one section of society”.
5. The *Norwich Green Party* said that the plan should allow for community land trusts and housing cooperatives to provide some of the required affordable housing.

Of those **not supporting** the favoured Option AH6, the following comments were made:

1. *Costessey Town Council* said that larger sites should include a Shared Equity Tenure option
2. *Diss and District Neighbourhood Plan Steering Group, Scole Parish Council, Persimmon Homes, Pigeon Investment Management, Pegasus Planning* on behalf of *Barratt David Wilson Homes* and *Lanpro* on behalf of a number of landowners and developers were of the opinion that tenure split should be considered on a site by site basis depending on local need and what can viably be delivered by a developer or funded by a Registered Provider.
3. One individual respondent felt that there is inadequate information to determine the real need for affordable rent and whether large-scale by-to-let blocks have translated into additional dwellings.
4. *Poringland Parish Council* raised concerns that AH6 would not give people a foothold into the ownership market.
5. *Climate Friendly Policy and Practice (CFPP)* argued for an affordable housing policy/monitoring based on a more detailed and locationally specific assessment of demand and need.

Question 40

Which approach do you think should be taken to rural windfall and exceptions sites?

Option AH7: Allow “small sites windfalls” to be permitted adjacent to development boundaries (i.e. sites of 10 or fewer to also include garden plots), subject to them meeting certain criteria (such as acceptable landscape impact, highways impact, access to services etc.) in all settlements with a development boundary.

Option AH8: Don’t allow any small-scale windfall sites for market housing, only for genuine “exception” sites (including an element of cross-subsidy, if necessary).

A total of 75 separate responses were received to this question. Of those who expressed a preference, 35 supported option AH7 and 37 supported AH8. 7 did not favour either option but offered a range of views on alternative approaches.

Of those supporting Option AH7, the following comments were made:

1. One individual respondent felt that exceptions should be allowed based on need, for younger or older people staying close to family or area.
2. Two individual respondents and *Great and Little Plumstead Parish Council* considered that approvals for homes outside development boundaries were already prevalent.
3. One individual respondent felt that Option AH7 would encourage local builders
4. One individual respondent felt that Option AH7 was more suited to a less dispersed pattern of growth, which they supported.
5. One individual respondent supported Option AH7 as they considered it more flexible than AH8
6. *NHS Norwich CCG* supported Option AH7 as they felt it would increase housing stock whilst remaining aligned to the principles of care closer to home. They did stress however that care would need to be taken to ensure cumulative impact of windfall sites does not negatively impact on capacity to deliver heat and social care services.
7. *The Broads Authority* stressed that it was important to consider impact on dark skies and landscape concerns.
8. *Framingham Earl Parish Council* felt that, whilst they supported Option AH7, safeguards must be put in place to stop continual piecemeal extensions of development boundaries.
9. *Lanpro*, on behalf of a number of landowners and developers, felt sites delivered under Option AH7 could provide a proportion of self-build plots.
10. *Lanpro*, on behalf of a number of landowners and developers, also suggested that the policy should refer to development being “close to” to account for irregular shape of some settlement boundaries.
11. *Savills*, on behalf of a number of landowners, recommended that proposals for housing should be allowed on land that is “well-related” to settlements as well as that on the edge of settlements. Similarly housing in appropriate groups in the Countryside should

be allowed. This approach will help ensure that the vitality of rural settlements is maintained.

12. *Tetlow King Planning*, on behalf of *Rentplus*, suggest that the Councils should seek a significant uplift in affordable housing. They also suggest that small site windfalls could effectively contribute to this aim and that the proposed approach would also tie in well with emerging NPPF proposals for entry level exception sites.

Of those supporting **Option AH8**, the following comments were made:

1. *CPRE Norfolk, Poringland Parish Council* and two individual respondents objected to, or raised concerns about, Option AH7 on the basis that it would encourage market housing in rural villages, which may negatively impact the character of those villages
2. One individual respondent states that exceptions should be limited to self-build or sites that specifically support a village through the provision of affordable housing.
3. One individual respondent was concerned that too many houses are built on inappropriate sites.
4. Two individual respondents raised concerns that small site windfalls can/have put pressure on small villages or areas where infrastructure is inadequate. *Thorpe St Andrew Town Council* felt that AH8 would help avoid pressure on infrastructure.
5. *Marlingford Parish Council, Kimberley and Carlton Forehoe Parish Council, Poringland Parish Council, CPRE Norfolk*, and a small number of individual respondents felt that exceptions should only be allowed where it meets a demonstrable local need for affordable housing.
6. One individual respondent stated that affordable housing should be maintained in perpetuity.
7. One individual respondent felt that there should be wider policy support for community land trusts.
8. One individual respondent considered that there is a significant need for affordable housing in rural areas.
9. *CPRE Norfolk* were concerned that broader definitions of “affordable homes” could include products that are not truly affordable.
10. *Bramerton Parish Council* felt that Option AH8 would maintain control on infill sites was better suited to determine need, design, location, layout and diversity of accommodation.
11. *Scole and Hethersett Parish Councils* and *Hand Consultancy* felt that allowing small sites to be treated differently undermines the certainty offered by the plan.

Of those supporting **neither option**, the following comments were made

1. *Climate Hope Action in Norfolk* were concerned that a relaxation of rules for windfall could undermine the approach to sustainable development.
2. *Climate Friendly Policy and Practice (CFPP)* argued for an affordable housing policy/monitoring based on a more detailed and locationally specific assessment of demand and need.

Question 41

Which approach to the mix of housing do you support?

Option AH9: Specify a threshold above which the identified housing mix would apply.

Option AH10: Do not require the identified housing mix need to be required on all sites individually.

A total of 72 separate responses were received to this question. Of those who expressed a preference, 17 supported option AH9 and 38 supported AH10. 17 did not favour either option but offered a range of views on alternative approaches.

Summaries of specific comments

Of those supporting **Option AH9**, the following comments were made

1. Two individual respondents and *CPRE Norfolk* make a number of interrelated points suggesting variously that: the right mix of housing will not occur without policy control and that this may exacerbate problems with the availability of smaller properties in rural areas; provision for the elderly, disabled, starter homes, affordable is already falling below need; and, that any mix threshold should be set at the lowest level possible.
2. *Thorpe St Andrew Town Council* state that there is a need for 1/2 bedroom homes in Thorpe St Andrew, the policy should not restrict this being achieved.
3. *The Norwich Green Party* state that the greater need for 1-2 bedroom properties is in Norwich and that this appears to strengthen the case for a Norwich Policy Area which could be used as an area within which the required housing mix for Norwich could be met.
4. *Cringleford Parish Council* suggest that the policy should require a certain size of property (m²) not number of bedrooms.
5. *Colney Parish Council* recommend that 33% affordable housing should be provided which is energy and water efficient.
6. *Tivetshall Parish Council* felt that option AH9 was necessary to ensure that the required housing mix would be consistently applied.

Of those supporting **Option AH10**, the following comments were made

1. *Scole Parish Council, Framingham Earl Parish Council, Diss and District Neighbourhood Plan Steering Group, Persimmon Homes, Lanpro* (on behalf of a number of landowners and developers), *Pegasus Planning* on behalf of *Barratt David Wilson Homes* and another landowner, *Code Development Planners* and four individual respondents all comment that they support AH10 as it is more flexible and/or because it could be tailored to meet local needs. Some also suggest that a rigid policy criterion is likely to lead to inappropriate outcomes on individual sites. Whilst supporting Option AH9, *Norwich Green Party* were also supportive of an approach where developers were required to provide a mix that would best suit local need.
2. One individual respondent suggests that a flexible approach will only work if decision makers have good knowledge of the needs of local areas.

3. Smaller properties are needed in the rural areas.
4. One individual respondent suggests that a third option should be considered where a specified mix is applied but with some flexibility afforded to decision makers.
5. One individual respondent suggests that there should be individual plans for towns/villages based on need.
6. *Persimmon Homes, Lanpro* (on behalf of a number of landowners and developers), *Pegasus Planning* on behalf of *Barratt David Wilson Homes*, and *CODE Development Planners* (on behalf of *Drayton Farms* and *Ben Burgess*) comment to the effect that it is important not to disregard factors such as: site characteristics, which might suggest a high or lower density is appropriate; specific local needs; and the developer's experience of market demand, which is an important factor in site viability.
7. *Lanpro* (on behalf of a number of landowners and developers) and *Pegasus Planning* on behalf of *Barratt David Wilson Homes* also suggest that any attempt to apply a blanket housing mix may well frustrate housing delivery, potentially, in Lanpro's view, repeating past mistakes that have resulted in missed housing targets.

Of those supporting **neither option**, the following comments were made

1. Two individual respondents suggest that: the GNLP does not do enough to ease affordability problems and address homelessness; there is a particular need for social housing; and/or, vulnerable single people need to be provided for within the plan as an identifiable under-provisioned group.
2. Two individual respondents suggests that there must be an understanding of the different characteristic of home occupiers and their different needs. Developers tend to build larger properties and this creates an imbalances in the housing market and imbalances in the local community.
3. The *Broads Authority* ask it to be noted that, as a planning authority, it will defer to the Greater Norwich policy on affordable housing.
4. The *Broads Authority* also consider that the extension of smaller properties results in a reduction in the available stock of smaller homes thereby impacting on availability and affordability of this type of housing.
5. Many people are unable to afford to buy or rent their own home.
6. One individual respondent suggests that many of the homes provided recently do not adequately provide for first time buyers. A new "garden city" would be an ideal place to assist younger people get onto the housing ladder.
7. One individual respondent proposes that old office space should be converted to small flats and states that there is a great need for 1/2 bedroom flats.
8. *Pigeon Investment Management* and *John Long Planning* (on behalf of *Otley Properties*) recommend that the mix of housing should be left to the market to decide.
9. One individual respondent suggests that: the proposals disadvantage older people; the focus is providing homes for young people; there are limited options for older people to downsize; homes should be provide that are appropriate for old age and disability. Three individual respondents suggest that not enough bungalows are being built.

10. *Climate Friendly Policy and Practice* (CFPP) argued for an affordable housing policy/monitoring based on a more detailed and locationally specific assessment of demand and need.
11. One individual respondent suggests that large homes could be designed to meet the needs of all generations, providing enough space for a granny annex or a “university boomerang”.

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Question 42

Which approach or approaches to housing for older people and care accommodation do you favour?

Option AH11: Enable residential care accommodation uses79 to be appropriate on any allocated housing sites, subject to a criteria-based policy

Option AH12: Make specific allocations for residential care and retirement care uses

Option AH13: Develop a criteria-based policy to enable new retirement/care accommodation to be accommodated on land outside settlement boundaries and/or on other types of land within settlement boundaries.

Option AH14: Require an amount of C2 residential care and/or C3 extra-care or retirement uses to be accommodated on “qualifying” housing allocations in particular locations

A total of 50 separate responses were received to this question. Of those who expressed a preference, 5 supported option AH11, 19 supported option AH12, 5 supported option AH13, 18 supported option AH14 and 3 did not favour any option. Of these, *Lanpro Services Ltd* on behalf of *Nigel Hannant* indicated they did not wish to respond and *Otley Properties* represented by *John Long Planning* stated they did not wish to comment at this stage but reserved the right to comment at a later stage. An individual respondent was pleased to note that the county council were doing further work on this issue.

Summaries of specific comments

Of those supporting **Option AH11**, the following comments were received

1. One individual respondent said that older people tend to thrive if they are part of a wider community. Though residential care would have to be in a separate building this can work if there are sufficient support systems.
2. *NHS Norwich CCG* state that health and care partners support options AH11, AH13 and AH14 as they all address the issue of health and wellbeing needs of older people.
3. *NHS Norwich CCG* also state that there needs to be clear and consistent engagement with health and social care partners to ensure that there is sufficient capacity within primary care services and community and social care or, where capacity doesn't exist, allow health partners to plan for additional provision wherever possible.
4. *Pigeon Investment Management* suggest that policies relating to Options AH11 and AH12 could include provision for assisting living and other forms of specialist residential care.

Of those supporting **Option AH12**, the following comments were received

1. *Great and Little Plumstead Parish Council* and an individual respondent suggest that unless specific provision is made residential care and retirement care uses will not be delivered. Market forces will not respond to these needs. Another individual suggests that the site opposite Wymondham Station should be acquired by the Councils and a small retirement village built upon it.
2. One individual responded suggests that all new build should have to outline how residents would cope if they became unwell or had limited mobility (e.g. even if say short-term due to a fracture).

3. *Brundall Parish Council* state that not all smaller houses are for elderly and so should be covered more in the City Centre areas. Care for older people features in the Brundall Neighbourhood Plan.
4. One individual respondent suggests that a good example to follow is Violet Elvin Court, off The Avenues, where health facilities, shops, a library and church are within easy walking distance, as is a regular bus service into the city centre. This should be considered as an exemplar.
5. One individual respondent suggests that demand for residential care is almost certain to increase.
6. An individual respondent suggests that residential care development should not be allowed on unallocated land. This could result in significant development in inappropriate locations.
7. *Lixin Ltd* state that it is critical to secure allocations to meet such needs, especially to allow flexibility to support innovative schemes that help improve quality of life and ease pressure on the bed space of acute facilities. The need for specific allocations to meet needs is echoed by the *Norwich Green Party*.
8. An individual respondent suggests residential care should be provided as part of every housing scheme.
9. *Climate Hope Action in Norfolk* and the *Norwich Green Party* comment to the effect that it is essential that residential and residential care have access to services/doctors/shops. *Climate Hope Action in Norfolk* suggest Options AH12 and AH14 are best suited to achieve this.
10. *Norwich Green Party* are concerned that Option AH13 could result in inappropriate development on unallocated sites, this concern is exacerbated by the potentially large demand for this type of facility in the future.
11. *Pegasus Planning*, on behalf of *Barratt David Wilson Homes* and the *Trustees of Arminghall Settlement* suggest that the need for institutional residential care would be in addition to housing need identified as part of objectively assessed need (OAN). Therefore, requiring provision of residential care facilities as part of a residential allocations could reduce the housing yield and impact on viability, thereby increasing the need for residential allocations and threatening delivery. *Norwich Green Party* are concerned that providers of residential care would always be outbid on any residential site.
12. *Cornerstone Planning*, on behalf of *Barnham Broom Golf and Country Club*, suggest that no option addresses the specifics of the development form being promoted at Barnham Broom. Barnham Broom provides for a range of services already and could have considerable merit in securing retirement and associated development, and at the same time enhance the long-term viability of those rural services.

Of those supporting **Option AH13**, the following comment was received

1. *Scole Parish Council* suggest that flexibility will be required as central Government will determine how to deal with an ageing population.

Of those supporting **Option AH14**, the following comments were received

1. *Costessey Town Council* state that Costessey already has a lot of large family homes being turned into residential care homes, but no new bungalows are being built.
2. A number of individual respondents support Option AH14 for reasons such as: the needs of the ageing population have to be met; that the identified need for residential care is unlikely to be met without it being made a policy requirement; and that this option is most likely to deliver. *Salhouse Parish Council* are not confident that needs will be met under any other option.
3. *Framingham Earl Parish Council* suggest that Option AH14 would give better access to local services for older people and not isolate them away from a community.
4. *Burston and Shimpling Parish Council* suggest that retirement villages or retirement flats should also be encouraged.

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Question 43

Which of the reasonable alternatives for houseboats do you favour?

Option HB1: Develop a criteria-based policy to allow for moorings for houseboats (temporary or permanent) to come forward in appropriate areas in Greater Norwich, subject to evidence of need.

Option HB2: Continue with the current approach of not having a policy to judge applications for moorings for houseboats against, relying instead on the NPPF and other development plan policies.

A total of 28 separate responses were received to this question. Of these, 11 favoured Option HB1 and 15 favoured Option HB2. *Otley Properties* and *Pigeon Investments* did not wish to comment at this stage but reserved the right to comment at a later stage

Summaries of specific comments

Of those that favoured Option HB1 (developing a criteria based policy) specific comments were as follows:

1. One individual respondent gave support for the option most favourable to encourage more houseboat moorings. Seen as a way of meeting demand and potentially enhancing the character of the area.
2. Another respondent suggested that specific areas should be earmarked for moorings with nearby facilities for laundry etc.
3. Another commented that Norwich is a river city and this is the only part of the GNLP with any mention of the river. Houseboats are not only recreational but can for a few be their main home, sometimes the only affordable option for a home.
4. *Thorpe St Andrew Town Council* questioned whether any proposed policy would pick up on the Broads Authority residential/houseboat mooring policy?

Of those that favoured Option HB2 (continue with the current approach of not having a policy) specific comments were:

1. A number of respondents agreed with the current approach of not having a policy saying that no demand is indicated and developing a policy is not a priority when there is so much other work to be done.
2. The *Environment Agency* comment that if Option HB2 to not have a specific policy is the preferred approach then they would recommend that reference to houseboats is made in the flood risk section to clarify that they do require a FRA.
3. One respondents was of the opinion that there are public health issues with living on the water which means that this mode of living as it presents itself on the Broads should not be encouraged.

One respondent suggested that both options are flawed but commented that at least HB1 recognises the need for policy development. They criticise the statement that there is no evidence of need in Greater Norwich when the consultant's report identifies a clear need. They suggest that this is a covert policy of resisting residential boats claiming that with a major shortfall in housing supply a reasonable option could be to gain a more realistic understanding of numbers, impact and needs and to make an open minded assessment of the many long standing 'informal' residential sites.

Action points:

- Need to cover the Environment Agency point that houseboats require a FRA either in a specific houseboats policy or in a flood risk policy.
- If the preferred option is to develop a criteria based policy to allow moorings for houseboats to come forward in appropriate areas consider using the Broads Authority residential/houseboat mooring policy as an example.

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Question 44: Which policy approach do you favour to planning for the needs of Gypsies and Travellers?

Option GT1: Make specific allocations of land to deliver the quantified need for new Gypsy and Traveller accommodation pitches (as well as a criteria based policy)

Option GT2: Require larger housing allocations (say 150+) to include a certain number of Gypsy and Traveller pitches to help meet the overall level of need

Of the 36 respondents who expressed a preferred policy approach in relation to this question, 31 supported the favoured Option GT1 to make specific allocations of land to deliver the quantified need for new Gypsy and Traveller accommodation pitches (as well as a criteria based policy) and 5 supported the reasonable alternative Option GT2 to require large housing allocations (say 150+) to include a certain number of Gypsy and Traveller pitches to help meet the overall level of needs.

Summaries of specific comments

Of those that favoured Option **GT1** (to make specific allocations of land to deliver Gypsy and Traveller accommodation) specific comments were:

1. *CODE Development Planners Ltd* on behalf of *Drayton Farms Ltd* support option GT1 as it would give planning authorities, applicants and existing communities the opportunity to consider the detailed and very site specific nature of such proposals.
2. One respondent supported this option as it would enable the Councils to carry out assessment into proper facilities and locations
3. *NHS Norwich CCG* support Option GT1 as it enables the continued delivery of services to these members of the population in a consistent manner as they often do not access mainstream health services.
4. *Burston and Shimpling Parish Council* agree with the provision of specific allocations for Gypsy and Traveller accommodation but not adjacent to settled communities as the two communities have nothing in common. They comment that travellers seem to travel often in quite large communities and a single pitch here and there would not be what they are looking for.
5. One respondent commented that by definition, Gypsies and Travellers move around. Therefore no travellers' sites should be large, as they would be off travelling. They suggest small sites located away from centres should be made available so they can maintain their chosen lifestyle with least interaction with the permanent residents. Therefore they support specified land being set aside.
6. *Costessey Town Council* commented specific to their area. Costessey already has a regulated site on the Dereham Road, plus the transit site by the Showground within two miles. They comment that if the transit site is upgraded to a permanent site another transit site would need to be found and suggest that Costessey already has sufficient sites locally. Their view is that more transit sites should be located near the arterial routes throughout Norfolk to enable Police to move travellers off unlawful sites. Old airfields should be used as there would be utility supplies present which could be used/upgraded.

Of those that favoured Option **GT2** (to require larger housing allocations to include a number of Gypsy and Traveller pitches) specific comments were related particularly to the

opportunity to help the travelling community integrate more effectively into existing communities which will provide the services they need. It was also considered by some that this option would foster less segregation/discrimination.

However there was some degree of opposition to option GT2 with specific comments including:

1. One respondent said that there is no observable evidence that Option GT2 would lead to social cohesion.
2. Two respondents suggested that 'peaceful and integrated co-existence between the site and local community' would be difficult to achieve as the lifestyle and values between the travelling and settled communities are so different. They were of the view that it would be difficult to get community support for gypsy and traveller pitches within a new housing allocation.
3. *Pegasus Planning Group* acting on behalf of two clients; *Barratt David Wilson Homes* and *Trustees of Arminghall Settlement*, do not support option GT2 as they suggest a blanket requirement for such provision on all larger housing allocation sites does not allow for the appropriateness of such use to be taken into account for individual sites.

The *Environment Agency* state that permanent residential caravans are highly vulnerable to flood risk and would not be appropriate development within Flood Zone 3.

The *Broads Authority* offer some general comments on this section, stating that the main title on page 89 of the document should include Gypsies and Travellers and Travelling Showpeople. They also question whether the use of the term 'dwellings' in paragraph 6.119 could cause confusion. Would 'caravans' be better?

Question 45: Are there any suitable sites for Gypsy and Traveller accommodation you wish to submit?

There were **no suggested sites** submitted in respect of Question 45.

Question 46

Do you support the favoured option for planning for the needs of Travelling Showpeople?

Option TS1: Make allocations to deliver some or all of the need for new Travelling Showpeople plots, along with a criteria based policy

18 respondents supported the favoured option for planning for the needs of Travelling Showpeople (to make allocations to deliver some or all of the need for new Travelling Showpeople plots, along with a criteria based policy), with 3 respondents against. The majority of respondents did not offer a reason why they either supported or did not support the favoured option.

Summaries of specific comments

Of the respondents in support of the favoured option the following comments were made:

1. One respondent supported the need to make allocations for all of the need for new Travelling Showpeople plots suggesting that the obvious place to site something like this is at/near the Norfolk Showground/Easton with easy access to A47 and minimal use of HGVs on small local roads. Freeing up the site at Mousehold could allow it to be used for new housing.
2. Two respondents suggested that proper provision should be made on suitable sites but that great care is needed in assessing suitability and local opinion should be considered.
3. One respondent stressed the importance of protecting the environment. If need is not met it will be a land occupation of convenience requiring substantial public effort to clear the trespass.
4. Another respondent highlighted that unauthorised parking on unsuitable sites is time consuming and difficult to manage/enforce particularly if suitable sites can be shown to be unavailable. Even with sites allocated, one may anticipate demand growing as housing remains unaffordable and homeless people numbers escalate.
5. *Costessey Town Council* commented specific to their area. Costessey already has a regulated site on the Dereham Road, plus the transit site by the Showground within two miles. They comment that if the transit site is upgraded to a permanent site another transit site would need to be found and suggest that Costessey already has sufficient sites locally. Their view is that more transit sites should be located near the arterial routes throughout Norfolk to enable Police to move travellers off unlawful sites. Old airfields should be used as there would be utility supplies present which could be used/upgraded.

Of the respondents against the favoured option only one comments was made from an individual who did not believe that the needs of travelling showpeople were greater than other more disadvantaged groups in need of social housing.

Two respondents, *Otley Properties and Pigeon Investment Management Ltd* stated that they did not wish to comment on this matter at this stage but reserved the right to do so at later stages if necessary.

Question 47

Are there any suitable sites for Travelling Showpeople accommodation you wish to submit?

Only two respondents made any comments in relation to question 47 – submission of suitable sites for Travelling Showpeople:

1. *Costessey Town Council* suggested that old airfields should be used as there would be utility supplies present which could be used/upgraded.
2. One respondent stated that the limited road access in their area would preclude any particular sites being attractive to showmen.

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Question 48

Do you support the favoured option for residential caravans and park homes?

Option RC1: Make allocations to deliver at least part of the quantified need/demand for new Residential Caravans, along with a criteria based policy.

21 respondents supported the favoured option to make allocations to deliver at least part of the quantified need/demand for new Residential Caravans, along with a criteria based policy, with 6 respondents against.

The majority of respondents did not offer a reason why they either supported or did not support the favoured option.

Summaries of specific comments

Of the respondents **supporting the favoured option** the following comments were made:

1. Suggestions from individuals that the need for these types of homes will grow in demand and they may contribute towards lower cost accommodation but that informal settlements are the least good option.
2. One respondent suggest that consideration should be given to access to public transport. Locations such as Spooner Row, Eccles, Reedham and Acle would allow access to the rail network. Proximity to the airport would allow access to the park and ride bus.
3. *Kimberley and Carleton Forehoe Parish Council* support the provision of this type of housing but believe that they should fall within development boundaries the same as all other development
4. *Salhouse Parish Council* support as only one option offered.

Of the respondents **not supporting the favoured option** the following comments were made:

1. Two respondents commented specific allocations should not be made for a particular group when there is so much need for affordable housing that is not related to 'lifestyle choices'.
2. *Thorpe St Andrew Town Council* would not support as not energy efficient accommodation
3. *Framingham Earl Parish Council* stated that these types of homes were not applicable to Framingham Earl. The majority of these types of homes are normally for holiday use and tend to be sited nearer to the coast and recreational areas, not residential villages.

Two respondents, *Otley Properties* and *Pigeon Investment Management Ltd* stated that they did not wish to comment on this matter at this stage but reserved the right to do so at later stages if necessary.

Question 49:

Are there any potential locations for new/expanded residential caravan sites that you wish to propose?

In response to question 49 regarding any potential locations for new/expanded residential caravan sites:

1. *Costessey Town Council* suggested that old airfields should be used as there would be utility supplies present which could be used/upgraded
2. One respondent was clear that there are no suitable sites in or near their village.

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CLIMATE CHANGE

Question 50

Do you support the favoured option for climate change policy?

CC1 Continue the current policy approach

A total of 76 separate responses were received to this question. 35 respondents supported the favoured option, 37 did not and the remainder provided comments without selecting either option.

Summaries of specific comments

Organisations in broad support of the favoured option included *Brundall, Scole, Hainford, Hellesdon, Bramerton, Colney, Cringleford, Kimberley and Carleton Forehoe, Salhouse, Tivetshall, Framingham Earl and Burston and Shimpling Parish Councils; Thorpe St Andrew Town Council* and the *Diss and District Neighbourhood Plan Steering Group; Railfuture East Anglia, Natural England, the Norfolk Wildlife Trust* and *UEA Estates and Buildings* represented by *Bidwells*.

Organisations in broad opposition to the favoured option included *Great and Little Plumstead, Colney and Poringland Parish Councils, Costessey Town Council, the Wensum Valley Alliance, CPRE Norfolk, Norwich FarmShare, the Norwich Society, Climate Hope Action in Norfolk, the Broads Authority, Norwich Green Party* and *Historic England*.

Detailed comments included:

1. **Action on climate change must be at the heart of the plan**, including impacts of transport, housing distribution, design and energy usage. Climate change policy needs to stand alongside policies of delivery, and be equal in the hierarchy, and included in transport and housing policies. Climate change cannot be ignored. 3 major factors to consider are: siting of new build, positioning and design of units, and the materials used in buildings e.g. triple glazing as standard. Buildings should be “disaster ready” e.g. with measures in place for heating, cooling, water supply, flood measures etc. Development should have a climate change target to be met by materials, energy and water use greater than that of Building Regulations.; highest standards should be applied to meet the demands by 2050. Policy is flawed if do not know current carbon emissions and effects of growing population. Need car charging points in developments, appraisals of embodied carbon in building materials, and not rely on Building Regulations. Need to set area on course for meeting the requirements of the Climate Change Act; should be clear numerical targets in line with UK carbon budgets. Should consider beyond 2036 as decisions now will have a massive long-term impact. The Plan needs to include and monitor all aspects e.g. reducing need to travel, encouraging modal shift, and engage with issues related to adaptation (e.g. heat island effect, water scarcity, flooding) based on an analysis of vulnerability to these. Policies and proposed developments should be measured for carbon footprint and rejected if not in-line with emission targets. Encouraging development outside the City increases carbon load / head. High density in the City means reduced carbon load through travel to work being more likely to be through walking, cycle or bus.

2. Policy is weak/vague; too timid. Cannot claim to be mitigating against climate change while following an aggressive roads and growth policy without requirements about materials in construction. There should be active consideration of the impact of all projected growth. Major growth policies for car centric suburbia ignores prevention of climate change; policy is fixated on motor car; need to know cumulative effect of the Western Link; need to minimise emissions from Norwich Northern Bypass; provide pedestrian paths and cycleways; encourage electric vehicles; build village sized developments with full range of housing and community facilities, not ribbon development along bypass; ensure available land is used; bus services to connect to local railway stations timed with train times; provide regular bus services into Norwich City Centre and beyond. Current strategy ignores transport emissions; policy should include transport emissions. DEFRA report recommended Local Plans develop robust policies to implement Climate change and Air quality improvements and a change in use of private vehicles. Need car charging points in developments, appraisals of embodied carbon in building materials, and not rely on Building Regulations. Minimise the need to travel, all settlements should have a primary school with safe walking routes; all secondary schools should have cycle tracks connecting to settlements; all settlements should have leisure facilities, community centres, doctors surgeries and dentists; settlements should be liberally planted with deciduous trees for cooling effect; houses should generate more electricity than they use and have water recycling, green roofs; roads should be surfaced with solar panels as in France; all communities should have allotments and nut trees planted for food; cycle tracks provided separate from roads.
3. Allotments/green space should be required in developments. Should protect natural habitats.
4. Past developments have avoided hard decisions about travel opportunities, safe radial roads into the City do not exist.
5. Norfolk is a water stressed area. Too many dwellings have been foisted on the County. Adaptation to issues such as water scarcity is a benefit and fundamental to the Plan, and should not be treated as a cost that affects viability.
6. Passivhaus should be a requirement. Buildings should be constructed to minimise heating, and include grey-water and other water saving measures.
7. Current approach is highly likely to be inadequate. Policy needs to be far stronger. Policy is vague, needs to exceed Government targets.
8. Should be policies on community energy and community food growing.
9. A letter from 43 signatories from backgrounds including climate science, water policy, medicine, conservation, construction and energy, urged that the issue of climate change is dealt with fully and realistically in the GNLP. The current approach does not take into account the Paris Agreement, the evidence of scientists, and the evidence of experiences in Norfolk such as storms, flooding etc. The letter sets out "Five asks" on climate: include measurable numerical targets on emissions reduction; show ambition on renewable energy and energy efficiency (e.g. 35 % on site renewables requirement as in London Plan, and do utmost to make high energy standards the norm, even if it cannot actually make them mandatory, and it is possible to set mandatory standards for commercial buildings so there should be a specific policy to do this); include robust evidence on vulnerability to climate change impacts (adaptation should form a key part of spatial planning); ensure transport proposals are consistent with policy aims (the existing policy has been undermined in Greater Norwich as almost all major transport

changes have been for more cars, the JCS Infrastructure Framework included a Bus Rapid Transit system of which there has been virtually no delivery); reconsider the weight given to “delivery” in the sustainability appraisal and provide evidence for the appraisal’s conclusion (criterion 5 on housing has been reduced to simply “delivery” in the conclusion when it is not an SA criterion; and the appraisal assumes without evidence, that options for wide dispersal of new homes across rural areas would meet this criterion more than other options; this is a serious misuse of the sustainability appraisal process and risks rendering the plan unsound if not corrected). Further, four key principles are suggested:

- All options should be tested against their ability to reduce greenhouse gas emissions in line with the UK’s legally binding carbon budgets, options which do not meet this should be rejected;
 - when considering economic viability (in line with RTPI guidance) ensure that the “long-term costs to business and communities of climate change are fully considered and that the long-term benefits of critical adaptation measures, such as green infrastructure, are properly accounted for”;
 - the Plan should take a long-term view, since its consequences will be felt well beyond 2036;
 - Opportunities for local communities to contribute to planning for a zero-carbon future should be maximised.
10. *Costessey Town Council* suggested maximising public transport reducing carbon emissions, requiring electric car charging points on all new developments, and making recycling easier.
 11. *Great Plumstead Parish Council* consider the policy proposal is watered down and not a proactive series of proposals to reduce the level of carbon emissions. The primary problem is acceptance of the level of growth and the level of private car use, the stripping of exhaustible reserves, and there is no end vision. When will the loss of growing land be seen as a grand failure to husband a precious natural resource?
 12. *Poringland Parish Council* do not support the policy because by encouraging development outside city boundary, the carbon load is being increased by the commute to work.
 13. *Colney Parish Council* do not support the policy. The GNLP offers no basis for reducing carbon and other greenhouse gases over its lifetime. There is nothing in the carbon-inducing sections on housing, on infrastructure, on non-road transport other than small steps towards bus and rail, building design and layout, which seeks to meet the statutory national commitments of 30% carbon equivalent reduction by 2030 and 80% of carbon-based reduction by 2050. This absence is a severe weakness in the Plan. In the light of the Paris Agreement for dealing with climate change, it is unacceptable that the GNLP contains no specific measures for meeting these legislated targets. There should be clear carbon reduction targets linked to annual carbon footprint audits for all aspects of the final GNLP and designed to meet nationally agreed targets.
 14. *Hellesdon, Bramerton, Salhouse, Framingham Earl and Burston and Shimpling Parish Councils* support the policy; *Thorpe St Andrew Town Council* support, but there is a need for a policy on energy conservation.
 15. *Cringleford Parish Council* broadly support but the policy should be more robust and integrate climate change into the design process of developments in a more holistic

manner. The draft Environment objective should be strengthened to: To protect and enhance the built and natural environment, make best use of natural resources, promote decarbonisation strategies, and prevent, mitigate against, and adapt to, climate change”.

16. *Kimberley and Carleton Forehoe Parish Council* support the policy, and this should include flooding – paving drives should be prohibited and building on flood plans as in Wymondham should be prohibited.
17. *Wensum Valley Alliance* do not support the approach. It does not provide sufficient incentive to reduce climate change. The current strategy is inadequate as it focuses solely on development and ignores transport emissions. In addition there are no detailed targets. The DEFRA report on Air Quality 2018 sought joint approaches to CO₂ / NO₂ emissions, and required a change of use of private vehicles, an increased rate of changeover to non-polluting vehicles, speeded up implementation by the Government in view of the Health Crisis, and robust Local Plan policies on climate change and air quality improvements. A new strategy is required that addresses emissions from transport and has targets in line with the government’s 5 year climate targets to be on course to meet the 80% reduction in emissions set out in the Climate Change Act.
18. *CPRE* are concerned by the lack of detail. Transport emissions should be addressed, with policies favouring public transport, providing homes close to employment, urban concentration is best.
19. *Woodland Trust* welcome reference to a healthy natural environment trees have a particularly important role and should be specifically referred to.
20. *Norwich Green Party* referred to the requirement for a policy on climate change in legislation. Current approach is not supported, it is out-of-date and does not take into account the Paris Agreement or evidence that global temperatures are increasing faster than predicted. The current target of decreasing emissions is not being met and transport emissions are increasing. Current JCS policy has 2 fundamental flaws: wording is vague and has too many loopholes; and the targets fail to cover all aspects of the policy e.g. reducing the need to travel, urban heat island effect or use of locally sourced materials. An effective policy would: measure all greenhouse gas emissions: include measurable numerical annual targets based on current science and UK’s carbon budgets; require carbon footprinting of all policy options major transport and infrastructure proposals, and these rejected if do not meet targets; demonstrate a clear / verifiable connection between evidence and policies; be informed by a comprehensive understanding of climate risk and run scenario testing; include specific policies on how emissions will be reduced in key sectors (transport, energy, business, domestic and agriculture); fully address the need to adapt to the future impacts of climate change; acknowledge climate change adaptation as fundamental to delivery of plan objectives; include policies which support community-led approaches to transitioning to a zero-carbon society (including community energy and food growing); consider the disproportionate impact of climate change on the most vulnerable (e.g. due to heat island effect, poorly designed buildings, lack of green infrastructure, existing ill health and lack of access to information) and how this can be addressed; consider climate resilience in all areas of the plan (e.g. design, water, the Broads).
21. *Norfolk and Norwich Transport Action Group* commented that the policy falls a long way short of achieving the ambitious changes necessary for significantly reducing, mitigating and adapting to climate change; a particular shortcoming is the lack of reference to the

importance of transport in cutting emissions. Also, the draft downgrades the priority given to climate change (compared to the JCS) and there is a lack of clarity in the objective, climate change should be treated as an issue in its own right and given top priority. Detailed reference is made to the Paris Agreement, the 2008 Climate Change Act, the Government's climate change strategy and the report of the Climate Change Committee on this. At a local level "action falls way short of action required to reduce carbon emissions. The favoured policy approach to climate change continues to ignore the consequential impacts of local transport choices and the role of the GNLP in shaping local transport and influencing strategic transport. Transport is now the largest emitting sector, accounting for 26% of UK greenhouse gas emissions. Locally, carbon dioxide emissions from road transport have increased in South Norfolk to 3.2 tonnes per capita from 2015 to 2016. In Broadland, carbon dioxide emissions from road transport (A roads) are half those of South Norfolk, but expected to increase because of the NDR / Postwick hub. The Annual Monitoring Report shows a troubling picture, including an increase in South Norfolk's transport emissions, an increase in the percentage of residents who travel by car, continuing loss of employment from the city centre to Broadland and South Norfolk. Also, there are longer journeys by car to strategic employment sites around Norwich. This shows the need for stronger packages of sustainable transport measures supported by demand management; concentration of growth in and around Norwich; and stronger city centre employment protection policies. Also, the Interim SA reference to the Environment Objective does not correctly reflect that it is to "mitigate against and adapt to climate change".

22. *Climate Friendly Policy and Planning* (represented by *Dr Andrew Boswell*): The policy is inadequate. Detailed references include: the national and international context, including the UK current target of 80% emissions reduction by 2050 and that there will likely be a more challenging 100% reduction target put in place within the first decade of the GNLP; the NPPF and draft NPPF and suggests that the government's intention is for local planning to contribute to radical reduction of carbon emissions; section 19(1A) of the Planning and Compulsory Purchase Act 2004; updates on the national policy and future national carbon budgets; the sustainable transport record in the Greater Norwich area; the Norwich Northern Distributor Road Development Consent Order and sustainable and public transport delivery; transport carbon emissions and JCS policy performance; Norfolk County Council's transport model. The proposed policy reflects that used in the JCS which, as practised by the GNLP in the first 5 years has set Norfolk on an over 6% increase in emissions (in the context of the Committee on Climate Change (CCC) target for the transport sector of a 44% reduction below 2016 levels by 2030. The GNLP has wasted at least a decade in delivery of major public transport interventions, particularly a £50m Bus Rapid Transit network. This is wanton irresponsibility in view of national and international obligations, and it is not credible to suggest continuing with current JCS climate change policy is a reasonable policy option. Current policy has led to the transport emissions and sustainable transport infrastructure required for modal shift to go in the exact opposite direction to what CCC say need to be done. A massive debt related to carbon abatement costs for future generations is being created by JCS policy. Monitoring on emissions is inadequate and should be on local performance and objectives. To develop a good climate change policy there should be a change of attitude and approach from GNLP, with officer and political climate change champions

appointed. A cross-party member group set up; and a workshop held on the climate change aspects of the local plan. The policy must take climate change seriously, developed by bringing forward the NATS review and NATSIP consultations, achieve BRT by 2026, freeze all new road building projects, and produce traffic models of each of the GNLP spatial options that go forward to Reg 19 consultation. The GNLP should also include a policy on high energy efficiency standards in new homes, and the Merton rule updated to a level that reflects best practice. Every new house should be on 100% renewable energy. Large-scale energy storage for renewable energy should be considered and home-level energy storage and smart grid solutions encouraged. Preferential status should be given to developers who go beyond policy compliance in energy efficiency and Decentralised and renewable or low carbon energy sources (DRLCE). Carbon foot-printing should be applied, with requirements for modelling suggested. Suggestions made for detailed monitoring of energy etc. Air quality is not represented as a serious issue, it should reflect the 2017 national Air Quality Plan. The GNLP should include monitoring outside schools, hospitals and care homes in its AQ policy. The DEFRA models should be updated for changes to the traffic network, including the NDR. An air quality policy is required.

Overall summary:

- The policy referred to as CC1R18 to carry on as before is totally inadequate. First, it fails to align with national obligations going forward. Second, its operation during the JCS period has resulted in very substantive policy failures in two areas: transport carbon emissions are set to go up, and sub-10% delivery of the sustainable transport proposals under NATS and JCS.
- Given the requirements of NPPF, CCA (2008), and PCPA (2004) s19 providing a national framework, and the Paris agreement and the IPCC AR5 report providing international and scientific context, a new climate change policy for the GNLP, referred to as CC1R19 is required before the Regulation 19 consultation.
- Key requirements for CC1R19 are that:
 - It is evidence based. This requires that carbon footprinting is adopted. As national policy indicates that transport is the sector that requires most emissions reductions in the next decade, and transport is the sector where the GNLP councils can make most difference to carbon emissions, carbon footprinting should be limited initially to the transport sector. The existing Norfolk County Council Transport model enables carbon footprinting of the transport sector to start immediately. A requirements specification has been given for how the carbon footprinting may be developed based upon it, and therefore requiring minimal costs in IT equipment, or staff training. It should include forecast housing projections and NATS implementation plans at an annual resolution through to 2036.
 - Sustainable transport and modal shift are prioritised over road building. The NATS review must ensure that it produces an implementation plan that aligns with emerging national policy to reduce transport emissions by 44% by 2030 (from 2016), and that this is proved by the modelling and carbon footprinting.
 - Once the evidence base exists, then the housing distribution option which produces the least carbon footprint should be selected. This will probably be Option 1.

- Energy saving and use of renewable energy should be maximised in all relevant policies, and EN1. EN1 needs to be ramped up to fit with current and future renewable capability – the basis for an EN1R19 has been outlined above.
- Monitoring and annual reporting should audit local actions from the GNLP. Background national trends may be interesting wall paper, but they are not monitors of the plan. Information provided should be concise, but rich in providing insight into trends, problems that need addressing etc. Suggestions have been made for this.
- Air Quality has not been covered in as much detail as hoped. However, a proactive AQ policy is required, and it must follow the latest national context given the DEFRA national Air Quality Plan, the successful legal challenge to elements of it, and the recent joint committee report. Opportunities must be taken to align local monitoring, and local modelling, with national modelling, and to update the SASR baseline. The modelling carried out on the NATS review and on the climate change policy can assist in improving local air quality modelling. The AQ policy requires modelling and annual monitoring along the same lines as the climate change policy.

23. *Climate Hope Action in Norfolk* view is that current policy approach is not fit for purpose. No alternative is offered. GNLP should be designed with mitigation and adaptation for climate change in mind. Norfolk's Climate Change Strategy is out-of-date, with no reference to Climate Change Act, Paris Agreement etc. There have been considerable developments in evidence national commitments, technology etc. Mitigation has health benefits and can produce jobs. Climate Change should be a clear priority in the vision statement, and placed at the centre of planning. Despite statements about considering climate change mitigation the Plan prioritises road infrastructure, suggests housing options that would maximise private car dependency, prioritises airport expansion, fails to address public transport shortfalls; and shows a lack of ambition for renewable energy, ecologically sustainable design and energy efficiency, with reference made to the Government's 2018 Clean Growth Strategy, UK Committee of Climate Change reports and other reports and Directives and papers. Information on emissions for all sectors are required and new targets to be set; with policy setting requirements to get the substantial emissions reductions urgently required.
24. The *Norwich Society* would like to see a rapid move to Passivhaus standard on all new housing as the best way of minimising climate change emissions. The extra costs of Passivhaus are now minimal and savings in running costs generally cover the additional mortgage cost. There should be proper provision for self-build and some sites or parts of sites set aside for small local builders. This would have the benefit of greater variety of designs than those from the large developers.
25. *RSPB* support the current climate change policy. Renewable energy development will play an important part in mitigating the impacts of climate change and in protecting the environment over the long term. However, it should not be to the detriment of biodiversity. Ecological sensitivity should be a determinant of renewable energy location, with constraint mapping carried out to include SPA's, SACs, SSSI's etc. and should be considered in planning applications. Carbon budgets are an important tool and local authorities have an important role to meet national carbon budgets. RSPB suggest setting a minimum target of 10% of energy demand from renewable and low carbon sources for major developments.

26. The *Broads Authority* do not support the approach, and refer to a checklist they have introduced that may help to address adapting to climate change. Also re para 6.179, wind turbines also need local support.
27. *Natural England* support the continuation of the current policy approach to using resources efficiently, minimising greenhouse gas emissions and adaptation to changing climate and weather.
28. *Norfolk wildlife Trust* support the approach. Climate change is a key and increasingly important issue affecting transport and housing location.
29. *Historic England* do not support the approach. Any climate change policies should address the inclusion of renewable technologies within conservation areas and to historic buildings, securing a balance between benefits and environmental costs, and seeking to limit and mitigate any such cost to the historic environment. There are exemptions to the energy efficiency requirements of the building regulations for historic buildings etc. with reference made to Historic England guidance on this issue. Any Climate change policy should refer back to the NPPF and what is meant by sustainable development, the conservation and enhancement of the historic environment is a key part of this; it is not helpful to separate out sustainable development issues such as climate change and the historic environment, an integrated approach is required. Some types of energy efficiency methods and renewable energy equipment will have a detrimental impact upon the historic environment and as such a flexible approach will be required in order to reconcile climate change measures with the conservation of the historic environment in the pursuit of sustainable development. The climate change policy should consider the consequences upon the historic environment in order for the Plan to be sound.
30. *NHS Norwich CCG* supports policy as it supports health and wellbeing objectives.
31. *Railfuture East Anglia* supports the policy that impacts of climate change must be considered in assessing the growth options.
32. *Pigeon Investment Management* consider that the building regulations regime, NPPF and PPG set a good standard for climate change that does not need to be duplicated within the Local Plan. However, policies should recognise the ability to step beyond these requirements to address bespoke issues of the Local Area.
33. *Otley Properties Ltd* consider that the Local Plan should not repeat/cut across other 'climate change' related requirements contained in the building regulations regime, NPPF and PPG.
34. *UEA Estates* - Every effort will be made in the future expansion of the UEA to ensure that developments do not adversely impact on air quality, and consider their impacts on climate change.

Question 51

Which approach do you favour for air quality?

Option AQ1 – Require planning applications which have the potential to impact on air quality to be accompanied by air pollution impact assessments and mitigation measures.

Option AQ2 – Do not have a specific policy in the GNLP on air quality.

A total of 76 separate responses were received to this question. Of these, 62 supported option AQ1 and 14 supported option AQ2.

OPTION AQ1

Bramerton, Brundall, Burston and Shimpling, Cringleford, Hellesdon, Kimberley and Carleton Forehoe, Tivetshall and Poringland Parish Councils, Costessey, Reepham and Thorpe St Andrew Town Councils together with the *Wensum Valley Alliance* and *Lanpro Services* representing *Nigel Hannant* all supported Option AQ1 but made no additional comments.

Comments from parish and town councils, statutory bodies and other organisations in support of Option AQ1 included:

1. *Anglian Water Services Ltd*: - Water Recycling Centres and large sewage pumping stations were historically built at a distance from existing development because of odour associated with the operation of the sites. Encroachment of receptors, particularly residential development, means there is a risk that odour and amenity issues could arise leading to restrictions on the continued use of Anglian Water's existing water recycling infrastructure. Any policy relating to air quality should require applicants to demonstrate that the continued operation of Anglian Water's water recycling infrastructure will not be prejudiced by occupied land and buildings.
2. *Broads Authority*: [The commentary on] Page 98 on air quality [focusses on] preventing the air quality getting worse through targeting emissions. Is there anything else that can be done, such as more street tree planting?
3. *Climate Friendly Policy and Planning represented by Dr Andrew Boswell*. (These in addition to related comments made under Climate Change and Energy)
Air quality is not represented as a serious issue, it should reflect the 2017 national Air Quality Plan. The GNLP should include monitoring outside schools, hospitals and care homes in its AQ policy. The DEFRA models should be updated for changes to the traffic network, including the NDR. Air Quality has not been covered in as much detail as hoped. However, a pro-active AQ policy is required, and it must follow the latest national context given the DEFRA national Air Quality Plan, the successful legal challenge to elements of it, and the recent joint committee report. Opportunities must be taken to align local monitoring, and local modelling, with national modelling, and to update the SASR baseline. The modelling carried out on the NATS review and on the climate change policy can assist in improving local air quality modelling. The AQ policy requires modelling and annual monitoring along the same lines as the climate change policy.
4. *Climate Hope Action in Norfolk*: - Exposure to outdoor air pollution is linked to a wide range of illnesses including cancer, asthma, stroke heart disease, diabetes and changes linked to dementia. For the health of the population and the impact on health care costs air quality must be improved in the local area. The 2015 air quality action plan has not been adequately actioned and the strategy is inadequate. Moving emissions elsewhere by diverting traffic, eg to the NDR, does not address their contribution to greenhouse gases and climate change. The plan lacks focus and actions on improving

and promoting public transport to make it more attractive. There is urgent need to update the bus fleet to reduce emissions, eliminate diesel, provide connected cycle routes and improve “walkability”. There is a strong case for expanding this to a wider health impact assessment: so AQAs would form part of a HIA, at least in certain circumstances.

5. *CPRE Norfolk*: Support for Option AQ1 but with more comprehensive monitoring, especially close to schools. It is vital that air quality data is made subject to progressive reduction targets and annually published.
6. *Diss and District Neighbourhood Plan Steering Group*: Concerns that certain sections of A1066 through Diss may at times be close to or exceeding permitted limits of airborne pollutants.
7. *Environment Agency*: any new development within 250-500m of a site permitted by us could result in the proposed development being exposed to negative impacts, e.g. odour, noise, dust and pests. The severity of these impacts will depend on local factors such as the size of the facility, the nature of the activities and the prevailing weather conditions. If the operator can demonstrate that they have taken all reasonable precautions to mitigate these impacts, the facility and community will co-exist, with some residual impacts. In some cases, these residual impacts may cause local *residents* concern, and there are limits to the mitigation the operator can apply. Only in very exceptional circumstances would we revoke the operators permit. These factors should be considered when identifying areas suitable for development. The locations of waste sites can be found on our public register at <https://environment.data.gov.uk/public-register/view/search-all>.
8. *Natural England*: - Policy should reflect the need for some assessments to include impacts on statutory designated sites, dependant on their proximity to a proposed development, as some sites are very sensitive to increases in air pollution. This approach would enable the cumulative effects of development on air quality to be assessed.
9. *NHS Norwich CCG*: Option AQ1 supports increased health benefits to the population.
10. *Norfolk Wildlife Trust*: support Option AQ1 as this would make it easier to allow for cumulative effects and could incorporate new national initiatives on air quality.
11. *Norwich Cycling Campaign*: - The inclusion of a specific air quality policy is supported as it will underpin the support for sustainable transport options at all levels of development planning and management.
 - The new Local Plan is an opportunity to provide a framework for growth around Norwich which will enhance city life and not overwhelm it. Norwich has a high level of journeys by foot and a rapidly growing number by cycle. With the development of electric bicycles, more people will be willing to travel further and this will extend commuter and leisure routes into a wider area, as long as the infrastructure is there. Growth that is based around a framework of good quality, pleasant routes for cycling and walking will not add to the congestion and pollution from traf-fic but instead will mean that Norwich becomes a model for healthy and vibrant city life.
 - Problems with air quality are not just in the city centre, despite the boundary of the AQMA. The victorian urban areas around the city centre which bear the highest impact of commuter and other traffic travelling into Norwich also have a large number of schools. The increase in pollutants from vehicles must not

increase by the 16-20% projected population growth of the lifetime of the Plan and that means that viable alternatives to the private car must be planned for, in place and attractive.

- The new Local Plan and Transport Strategy need to reduce the number of vehicle movements into and around Norwich as the level of pollutants is already injuring health. The current NATS has an adequate approach to reducing motor traffic across Norwich city centre, but the closure of Westlegate was delayed for about 10 years and the plans to take through traffic from Prince of Wales Road has just been abandoned. It must be a priority to reduce cross city movements as well as traffic through the victorian and suburban areas around Norwich.
- Only a commitment to improve AQ through a more robust policy to alternative means of transport will make a difference. Making walking and cycling into real priorities means that changes to the road system in Norwich need to be more robustly policy driven and evidence-based rather than based on 'fears' about the traffic flow on inner ring road, for example. If the opportunities for more people to use alternatives to the private car are not put in place, congestion and pollution will get worse. Norwich will become a less attractive place to live, work and visit.

12. *Norwich Green Party*: strongly support the inclusion of a specific policy on air quality.

- Reference made to Defra guidance on policies on air quality. To exclude air quality at local plan level would send a message that Greater Norwich is not taking the issue seriously. Air pollution impact assessments should be required for applications likely to have a negative impact on air quality, including virtually all new developments, with the onus on the applicant to provide evidence for why an assessment is not needed, not on the local planning authority to show why it is necessary. This policy should apply to all locations, not only those where air quality is already poor. Particulate matter (PM^{2.5} and PM¹⁰) should be taken into account as well as nitrogen dioxide (NO₂): PM [particulate matter] is a more dangerous form of pollution, and there is no safe level of exposure to it. In line with Institute of Air Quality Management guidelines, decisions should take into account cumulative impacts and not just the individual application in isolation.
- The starting point for any policy should be the principle that good planning can reduce pollution, rather than simply not making it worse. Requirements should be: avoid creating 'street canyons'; a minimum number of electric vehicle charging points per 10 dwelling (modelling for impact assessments should be based on current take-up of EVs, and not optimistic future scenarios); mitigation measures including tree-planting and provision for sustainable travel. Measures to protect occupants from poor air quality (e.g. siting living rooms and bedrooms furthest from the road) must not be considered sufficient in themselves – the goal should be to improve air quality, not just to screen people from pollution.
- A supplementary planning document could set out what is expected from an assessment and mitigation. A good policy will cover matters such as efficient design and reducing energy use, which will align with policies aimed at reducing greenhouse gas emissions.
- DEFRA estimates the economic cost from the impacts of air pollution in the UK at £9-19 billion every year – this should be factored into any argument about the perceived cost of implementing measures to improve air quality. A damage cost

approach such as that used by Defra should be used in calculating the level of mitigation required.

- However, mitigation should not be deemed sufficient in every case. (eg 2017 Swale appeal) if it is deemed that the impact on air quality would not be negated.
 - The policy should also cover air pollution impacts on ecosystems (strong evidence that nitrogen deposition has reduced the diversity of plant species in semi-natural habitats across the UK, with reference to Natural England Literature Review). It should therefore consider roadside locations including those outside the main urban area, and the impact of wider transport policy. A damage cost approach should be used for road schemes as well as for planning applications.
 - Agriculture is a major source of PM2.5 pollution (as well as water pollution) ammonia from fertilisers combines with nitrogen oxide from vehicles and other sources. This adds to the case for rapid reductions in NOx pollution, and it should be noted within the local plan policy.
 - As well as covering impact assessments for individual planning applications, the policy should also cover the role of strategic-level planning. Policies on transport, housing distribution, energy and design can have a major impact on air quality, and the interrelatedness of these policy areas should be acknowledged. A number of references given to source material.
13. *Railfuture East Anglia*: - supports the policy that impacts of climate change must be considered in assessing the growth options.
 14. *RSPB* - When considering the potential negative effects of air quality / emissions on biodiversity / designated sites reference should be made to Hall et al.
 15. *Woodland Trust*: Strongly support AQ1. The impact of new development on air quality should be taken into account and mitigation plans included with a planning application. Increasing evidence for the role which trees, planted in appropriate locations, can play in removing airborne pollutants (eg NO2 and particulates). Some tree species are better than others and they should be planted at busy road junctions / air pollution hotspots. Reference given to a report on the subject.
 16. *Thurton Parish Council*: Option AQ1 provides the better opportunity to address the air quality impact on settlements affected by through traffic from development elsewhere.
 17. *Great and Little Plumstead Parish Council*: - To have planning policies in place which require applications to have assessments and include prevention or reduction measures. A DEFRA report (07.03.2018) on Improving Air Quality noted that "more robust air quality policies should be included in Local Plans". "CO2 reductions should be combined with NO2 and particulate reduction to reduce both". "Particulate matter is produced with both brake and tyre wear, not just emissions". "Government policy should focus on reducing vehicle use".

Other comments in support of Option AQ1

18. Air quality is becoming a problem and this policy should give a stronger lead on the issue. Essential to improve air quality. A specific policy with measurement of impacts will be more effective. Large developments can have a substantial impact on air quality (standard factors suggested for consideration of developments). Unless it is a requirement it isn't going to happen. Have a policy on air impacts so that it can be measured against actual and controlled.

19. Requirement for impact assessments should cover all locations, not just those already in breach of limits. Policy should consider all relevant forms of air pollution, in particular particulate matter.
20. Impact by oxides and particulates upon health is proven; increasingly clear that it impacts on health. A damage cost approach should be used. Policy should be clear that permission will be refused if mitigation measures are not sufficient to negate impacts.
21. Good planning includes walking, cycling, public transport, tree planting, green roofs etc
22. With more robust monitoring, especially near schools. Annual reviews with progressive reduction targets in policies.
23. "Option AQ2 is a non-option".
24. The impact of roads near nurseries / schools should be considered, do not put them near main roads. Against AQ2 but not sure AQ1 is best alternative, a more direct approach that assesses traffic and transport issues might be as good or better than impact assessments.
25. Norwich City Council are continually breaking the law in not enforcing emission levels. Young and old are affected.
26. DEFRA report on Improving Air Quality (07/03/2018) required that Local Plans have policies aimed at improving the Health Crisis from vehicle emissions and particulate production. Without such policies new developments will soon be outdated and inadequate Local Plans should be looking to 2040 when Petrol and Diesel sales for vehicles are stopped. We are choking. Need a plan of how we are to immediately start impacting upon this problem. Charging points in new developments should be essential. Should require safe cycling/walking routes separated from the vehicle roadways and Public transport.
27. Reference made to comments on GNDPs approach to climate change and energy policy
28. Air quality in South Norfolk is not of the best. Assessment is necessary to prevent further deterioration.

OPTION AQ2

Hainford and Salhouse Parish Councils supported Option AQ2 but made no further comment

Comments from parish and town councils, statutory bodies and other organisations in support of Option AQ2 included:

1. *Framingham Earl Parish Council*: feel that AQ2 would allow for more flexibility therefore we would favour this option.
2. *Otley Properties represented by John Long Planning*: - considers that the Local Plan should not include an air quality policy as it would add to duplication of existing provisions and potentially lead to confusion and conflicts.
3. *Peter Rudd, Barratt David Wilson Homes and the Trustees of Arminghall Settlement represented by Pegasus Planning Group*: A blanket requirement for an air pollution statement will add to the material required for a planning submission and will not be justifiable in all cases. AQ2 acknowledges that there are other powers available to ensure that air quality can be protected through development proposals.
4. *Pigeon Investment Management Ltd*: - consider that the Local Plan should not include an air quality policy as it would add to duplication of existing provisions and potentially lead to confusion and conflicts.
5. *UEA Estates and Buildings represented by Bidwells*: - Every effort will be made in the future expansion of the UEA to ensure that developments do not adversely impact on air quality, and consider their impacts on climate change.

Other Comments

6. A private individual supported policy AQ2 – no specific policy - arguing that “policy already exists” (implying that the existing policy is sufficient).

DRAFT

Question 52

Do you support the favoured option for flood risk policy?

Option FR1 – Require all relevant applications to undertake a site-specific Flood Risk Assessments and to provide a Surface Water Drainage Strategy showing how any SuDS infrastructure will be maintained in perpetuity.

A total of 70 separate responses were received to this question. Of these, 60 supported the favoured option on flood risk and 10 did not. Those who did not support the favoured option argued variously that the requirement did not go far enough, that the issue of flood risk was already adequately covered in national policy and guidance, that the requirement would be too expensive for small builders, or that the particular requirement for SuDS was not appropriate in all circumstances. There were also a number of comments in opposition to development either generally or in specific locations, on the grounds that any development would be likely to increase the risk of flooding.

Summaries of specific comments

Hellesdon, Great and Little Plumstead, Bramerton, Cringleford, Poringland and Scole Parish Councils; Reepham and Thorpe St Andrew Town Councils and 10 private individuals supported the favoured option FR1 without making any additional comment.

Comments from parish and town councils, statutory bodies and other organisations **in support of Option FR1** included:

1. *Diss and District Neighbourhood Plan Steering Group* referred to The Suffolk CC flood risk assessment and management plan. Both Flood authorities should co-operate to ensure consistency in work and mitigation measures. The R Waveney has high concentrations of neonicotinoids from farmland; flood management measures should minimise the flushing of such pollutants into water courses.
2. *Kimberley and Carleton Forehoe Parish Council* supported FR1 and stated that flood risk must be researched.
3. *Barford Parish Council* - It seems totally appropriate that developers undertake assessment of flooding risks etc.
4. *Framingham Earl Parish Council* - In the Framingham Earl/Poringland area there are considerable drainage and flooding problems. It would seem sensible that water issues are considered for the whole area and not just on a site by site basis, and the water from one site not be pushed onto another. The area is well known for the many unmapped springs, which if water is compressed on one site will then pop up elsewhere.
5. *Wramplingham Parish Council* - It seems totally appropriate that developers undertake assessment of flooding risks etc.
6. *Tivetshall Parish Council* felt it was important that flood risk should be considered in respect of planning applications in all locations, as loss of open ground can create a flood risk.
7. *Hainford Parish Council* stated that all sites, of any size, where there is a flooding issue should be referred to the Environment Agency.
8. *CPRE* suggested that open / floodable river valleys be part of the flood adaption strategy in the Plan. There should be a “greater Norwich Rule” for energy efficiency etc., and not rely on national policies.

9. *Norwich Green Party* support Option FR1 and welcome strong encouragement of SuDS and guidance on “green” SuDS, such as green roofs and swales, and water re-use, with integration of flood and water management as much as possible at a local level, and a catchment–scale approach taken including tree planting and soil management. Climate change will increase the risks. The plan could include a policy of encouraging the use of flood-resilient materials in new buildings, and measures such as raised electrical sockets and wiring above floor level in flood risk areas. For greater transparency, annual monitoring reports should not only report the number of applications approved contrary to Environment Agency advice on flood grounds, but should give detail on these applications, why they were approved, what the advice was, what measures have been taken to mitigate flood risk, and how impact is being monitored.
10. *Climate Hope Action in Norfolk* - Given the increased risk of flooding glad to see this acknowledged in the plan. It is vital that no new housing is developed on land likely to flood. The plan should include a more active focus on council-led engineering to work with nature to reduce flood risk, e.g. by development of natural spaces to assist in flood management such as reinvigoration of wetlands and water meadows. Furthermore, GNLPS should not only cover flooding, but also: water availability, urban heat island effect, building overheating and impacts on the food system. Climate scenario testing should be used to model the impacts of climate change on the plan objectives, and all policy options tested for resilience.
11. *The Woodland Trust* supports the need for flood risk assessments and surface water drainage strategies and for SuDS to be incorporated into development and *maintained* in the long term. There should be recognition of the role trees and woods play in alleviating flooding, reducing the rate of run-off, with reference to their report “Stemming the Flow”.
12. The *RSPB* support the favoured option and the benefits of SuDS with reference made to a report by the Welsh Government on the economic benefits.
13. The *Environment Agency* support the requirement for a Flood Risk Assessment and Surface Water Drainage Strategy, and suggested possible elements of the policy. It also recommends a Level 2 SFRA being done to help guide growth options and to prepare policy. Reference was also made to ongoing work on assessing potential flood risk management projects in the area and the Broadland Futures initiative, under which developers could contribute to projects. The Local Plan should refer to the need for an Environmental Permit for Flood Risk Activities in proximity to rivers / flood defence structures etc. All new developments should implement SuDS and seek to retain 100% of surface water on site, with SuDS included in green infrastructure. Reference was made to the benefits of SuDS including as an increasingly important resource for water. The use of deep infiltration systems should be the last option in the SuDS hierarchy. The Plan should encourage the use of shallow infiltration devices with appropriate pollution prevention measures. Where these are not possible, a discharge to watercourse or sewer should be explored prior to considering deep.
14. *Natural England* support Option FR1 to require all relevant applications to undertake a site-specific Flood Risk Assessments and to provide a Surface Water Drainage Strategy showing how any SuDS infrastructure will be maintained in perpetuity. SuDS should complement and be in addition to new GI.

15. *Anglian Water Services* - It is important that the new Local Plan considers all sources of flood risk including sewer flooding and the impact of new development on Anglian Water's existing water recycling infrastructure.

We would ask that the new Local Plan policy relating to water supply and flood risk includes the following requirements:

- Applicants to demonstrate that capacity is currently available within the water and public sewerage networks and receiving water recycling centre in Anglian Water's ownership or can be made available in time to serve the development.
- Sustainable Drainage Systems (SuDS) to be identified as the preferred method of surface water disposal and that it is considered as part of the design of new developments and re-developments. The policy should also ensure that applicants provide evidence as part of the planning application that they have followed the surface water hierarchy as outlined in the National Planning Practice Guidance. With surface water connections to the public sewerage networks being allowed only on an exceptional basis where alternatives are shown to be technically unfeasible.
- That suitable access is safeguarded for the maintenance of existing water and drainage infrastructure following development.

16. *Persimmon Homes (Anglia Region)* supports the favoured option and recognises the importance of ensuring that a viable drainage strategy is achievable but suggests that the level of *information* required should be proportionate to the stage of the application to prevent delays and unnecessary costs in the early design stages of a project.

Other comments in support of Option FR1

17. It is a major issue for Norfolk and the policy should be followed rigorously. It is essential to have a Flood Risk Assessment for any development. No development on flood-plains / areas at risk of flooding. Chalk aquifers need to be protected. Avoid building in *the* river valleys.

18. Flood Policy / guidance should encourage options such as allotments, greenways, community orchards etc. and Plans should include water run-off mitigation assessment e.g. use of living roofs etc.

19. The favoured Growth Policy increases the risks and demands of surface water and foul water collection and treatments. Hard surfaces increases the dangers of more surface water runoff. In the proposed development areas infiltration schemes do not work, and discharges to rivers increases sediment and pollution risks. The Food Enterprise Zone is an example of where risks have not been addressed by relevant authorities, but left for "reserved matters" stage. Hard line regulation is the only option. Some developers are placing drainage lagoons as part of public open space and there have been discrepancies in the effectiveness of SUDS infiltration techniques which are a risk. NNDR lagoons are not draining in the anticipated time scales.

20. Flooding is a big problem in the area and will get worse with climate change. The policy should make clear the need to plan for future climate change and not just the present situation. SuDS should be encouraged, with preference for "green" SuDS not storage tanks because of their wider benefits. Policy should include the strategic level, with a commitment to a catchment scale approach.

21. In unusual situations like Poringland, positive drainage to sewer is needed, otherwise rainwater run-off will emerge at the edge of the perched water table as springs, with the property suffering such having no recompense against the perpetrator.

Comments from parish and town councils, statutory bodies and other organisations **who did not support Option FR1** included:

1. *Brundall Parish Council* considered the favoured option will be too expensive for smaller developers.
2. *Costessey Town Council* stated that because of specific geology SuDS are not appropriate on many sites in Costessey. Flood Risk Assessments and Surface Water Drainage Strategies should be required for planning applications. SuDS should be done properly and checked to ensure water does not go into river systems.
3. *Otley Properties and Pigeon Investment Management* both considered that the Local Plan should not include a policy on Flood Risk as this is adequately dealt with in the NPPF and PPG.
4. Norfolk is generally flat, the climate is warming, and the oceans are rising. The plans would lead to localised and generalised flooding, roads becoming ice rinks, and the wilful destruction of ancient burial grounds, hedgerows and cures for cancer in the plants and animals yet to be analysed. Empty office blocks all over Norwich and other towns should be converted. Use brownfield sites.

Other comments in opposition to Option FR1

1. Poringland is a known flood risk area, dig a hole anywhere in this area and water will pour in. Very concerned about the sheer volume of development and affect it has on the ditches and waterways. The water has to go somewhere. Groundwater springs are legion in this area, if you develop over a spring the water will spring up somewhere else. *[This comment from an individual respondent largely reflects that of Poringland Parish Council, who nevertheless supported the favoured approach]*
2. We do not yet know the impact of developments that are approved but not yet built, such as those within the North East Growth Triangle. Until the extensive developments within the NEGAT are largely completed it will not be known how credible the SFRA and FRA's within it has been. The development has not complied with PPs 25 Development and Flood Risk and should not have been approved. Complaints have been made about this, with reference made to past discussions and correspondence with Councils and MPs etc. and the Sprowston Town Council Flood Risk Working Party. In many cases Sustainable Urban Drainage Systems (SuDs) are not sustainable in this area resulting in developments having to drain surface water by exporting it – channelling it away. As a consequence this adds to the problem of drainage in adjacent and downstream developments. Anyone studying this whole issue, and accepting the veracity of this submission would urge not just caution, but a decision at this stage that we have no option but to stop approving further development until we all know where we stand on this very important matter. The work underway is very obviously now gaining credibility, please pursue it because it is invaluable to prevention and mitigation for decisions made in the past but which effect is not yet known.
3. [The favoured option] does not go far enough as SUDS may not be the best answer. We saw at the Food Hub LDO at Easton how pleas for a detailed plan were ignored and left as reserved matters, 'all right on the night stuff'. It was alleged that the Environment

Agency were pliant and Norfolk County Council as lead flood authority would not even apply its own policy guidelines.

DRAFT

NATURE CONSERVATION AND GREEN INFRASTRUCTURE

Question 53

How should nature conservation and Green Infrastructure be covered in the GNLP?

Option NC1 – Require housing developments to provide additional green space on-site to address the impact of housing growth on designated nature conservation sites (reasonable alternative)

Option NC2 – Require housing developers to make payments so that impacts on the designated nature conservation sites are addressed.

A total of 78 separate responses were received to this question. 45 respondents supported option NC1, 10 respondents selected option NC2 and 23 respondents selected neither option but provided other suggestions and comments.

Summaries of specific comments

OPTION NC1

Bramerton, Kimberley and Carleton Forehoe, Cringleford, Poringland, Tivetshall and Burston and Shimpling Parish Councils supported Option NC1 without making any additional comment.

Comments from parish and town councils, statutory bodies and other organisations in support of **Option NC1** included:

1. *Diss and District Neighbourhood Plan Steering Group* - Option NC2 attaches the risk that permission will be granted where it would otherwise be inappropriate and that funds may be diverted away from the intended mitigations.
2. *Scole Parish Council* - Absolutely not NC2, as money can always be redirected to other more pressing needs.
3. *Reepham Town Council* – Support Option NC1 subject to adequate funding for future upkeep
4. *Thorpe St Andrew Town Council* – Require housing developments to provide additional green space on-site to address the impact of housing growth on designated nature conservation sites.
5. *Salhouse Parish Council* – [Option NC1] will better ensure the work is delivered.
6. *Framingham Earl Parish Council* - conservation sites should not be being built on in the first place.
7. *RSPB* - welcomes the GNLP's intent to address potential impacts from housing growth on designated sites. We do not favour one option over the other, rather that there should be a policy which is all-encompassing from which one is able to select the most appropriate option, dependent on the type and scale of development.
There are a number of local planning authorities (LPAs) around the country that are currently pursuing Recreational and Avoidance Mitigation Strategies (RAMS) in relation

to this matter. We understand that the LPAs around the Solent are at an advanced stage and would suggest that the GNLP looks at their developing best practice principles. It is important that the GNLP, when addressing nature conservation, looks beyond the network of designated sites and explicitly references priority habitats and species. An integrated landscape approach to improving ecological networks is fundamental in conserving our wildlife. As highlighted in Professor John Lawton's 2010 report Making Space for Nature, many habitats such as hedgerows, meadows, heathlands, woodlands, sand dunes, wetlands and flower rich field margins do not fall within protected sites. This would achieve compliance with the NPPF.

8. *NHS Norwich CCG* – in order to promote health and wellbeing among the population. The publication of the UK Government's 'A green future: our 25 year plan to improve the environment' in January 2018 includes detail in Chapter 3 on helping people to improve their health and wellbeing by using green spaces. This includes considering the impact this has on mental health and how associated services can improve mental health. Option NC1 would support the principles addressed in this publication.
9. *Promoter of site GNLP0442* (Land at Racecourse Plantation, Sprowston) represented by *DLBP Ltd (Harriet Swale)* Option NC1 that requires housing developments to provide additional green space on site to address the impact of housing growth on designated nature conservation sites.
Nearly all of Racecourse Plantations (Ref: GNLP0442) is a County Wildlife Site, and in compliance with this option, the proposal currently subject to an appeal (Ref: APP/K2610/W/17/3188235) also includes the provision of a Community Woodland Park in addition to the 300 new homes.
The new Community Woodland Park would provide a significant local recreational and nature conservation resource by facilitating the management of the site for public access, recreation and ecological enhancements, instead of the existing forestry management associated with its current use as a plantation.

Other comments in support of Option NC1

10. It is vital for new developments to provide green space and also be aware of green corridors
11. Anything more than a handful of homes/ flats should have some green space requirement. This could be a shared courtyard not accessible to the general public, for example. In inner city high density flats, there are options such as green walls, living roofs, etc. which can contribute to this requirements.
12. Building near designated areas should not be allowed in the first place. Planting a few trees, although always welcome, doesn't cut it.
13. Designated conservation sites should be protected and any development affecting them should be proven to be a last resort. Where development would have a negative impact on these sites, land should not be allocated.
14. Sensitive wildlife sites should be protected from over-use. They should not allow dogs, as this will cause disturbance to many wild species and over use of the site. (I have seen this happen over the years at sites such as UEA, where paths get wider and wider and wildlife declines).
15. Additional, less sensitive, green space (such as new parks) should be provided for dog walkers, runners etc. and dog wardens should be employed as necessary to enforce the policy.

16. It is also important to recognise that green spaces are not interchangeable. You cannot cut down or degrade an existing wood or hedge and create an equivalent habitat by planting a few new trees or hedges - the original flora and fauna will be destroyed.
17. Only if continuous funds are made available for the long term upkeep.
18. Any such development should be made in conjunction with nature trusts who should advise on the impact, lead on suggestions to offset the impact and also the development of alternative green spaces.
19. This should not be an 'either/or' option, so both should be followed to allow flexibility. All designated conservation sites should be protected and any development affecting them should only be allowed as a very last resort.
20. Houses should have gardens not necessarily green spaces. Gardens where games can be played, vegetables grown etc.
21. This should reinforce to developers their responsibility to the site and area they are working on and their duty to minimise any prejudice to its natural environment
22. "Once a green space is gone, it is gone forever".
23. NC2 makes too much potential for officers and "NGO vanity projects" to be paid for by developments well away from the project being posited.

Other Options

Lanpro on behalf of several landowner and developer clients argued for a variation of Option NC1 under which the development of new settlements and major sites would provide the focus for the provision of the majority of new green infrastructure. Their individual representations are all presented below for completeness: the argument is the same in all but is subject to minor variations according to the specific site of sites being promoted.

1. Representation on behalf of *the promoter of site GNLP1054 (Land off Manor Road, Newton St Faith); Glavenhill Strategic Land; Promoter of site GNLP0487 (Land off Norwich Road Salhouse)*
 We support a **variation of option NC1** where specific housing, employment and a new garden settlement in the Cambridge-Norwich hi-tech corridor are chosen to deliver large areas of strategic green infrastructure. My clients have already made detailed representations promoting a number of sites at Rackheath, Salhouse, Barford, Caistor St Edmund, Mulbarton and Hethel (the new garden village site) to deliver a network of new large green spaces including Country Parks linked to housing and new settlement delivery.
 We consider that the blanket application of option NC1 as an enlarged fixed open space requirement to be delivered on all new housing sites regardless of location, context, scale and viability will not deliver the quantum, or quality, of strategic green infrastructure needed to meet existing shortfalls or offset the impact of planned new housing growth on the Natura 2000 sites (including the Norfolk and Suffolk Broads) quickly enough. This over-and-above requirement will only serve to frustrate development on viability grounds. Furthermore, this new dispersed network of extra green space on housing sites in conjunction with Whitlingham County Park will also not be sufficiently attractive to mitigate against the inevitable recreational impacts of new growth on the North Norfolk Coast SAC, SPA and Ramsar, The Broads SPA and Broadland

SPA and Ramsar. This is evident through the on-going application of a similar extra green space policy in Broadland District Council area that is doing very little to meet overall open space targets/existing deficiencies within the Norwich Policy Area.

We further consider that the pooling of offsite payments as proposed under **option NC2** will also not work for the same reasons. The problem being that land on the edge of existing urban areas where sustainable growth is being focused has clear hope value and is therefore typically not for sale for low-value open space and recreation uses. The clear and obvious way forward is to select specific housing sites as a focus for growth around the City of Norwich that are sufficiently large to accommodate this shortfall and open space requirement and to make open space delivery (quantum, type, equipment required and phasing) a requirement of the allocation in order to provide meaningful Green Infrastructure.

2. Representation on behalf of *Silfield Limited*

Lanpro supports a **variation of option NC1** where specific housing, employment and new settlement sites are chosen to deliver large areas of strategic green infrastructure. Lanpro considers that a network of new large green spaces including Country Parks linked to development is the appropriate strategy. **This site in Barford** (see Call for Site Submission) could be part of that network (for full details of the proposal please refer to Question 4). Lanpro considers that the blanket application of option NC1 as an enlarged fixed open space requirement to be delivered on all new housing sites regardless of location, context, scale and viability will not deliver the quantum of strategic green infrastructure needed to meet existing shortfalls or offset the impact of planned new housing growth on the Natura 2000 sites (including the Norfolk and Suffolk Broads) quickly enough. This over-and-above requirement will only serve to frustrate development on viability grounds. Furthermore, this new dispersed network of extra green space on housing sites will also not be sufficiently attractive to mitigate against the inevitable recreational impacts of new growth on the North Norfolk Coast SAC, SPA and Ramsar, The Broads SPA and Broadland SPA and Ramsar. This is evident through the on-going application of a similar extra green space policy in Broadland District Council area that is doing very little to meet overall open space targets/existing deficiencies within the Norwich Policy Area. We further consider that the pooling of offsite payments as proposed under **option NC2** will also not work for the same reasons. The problem being that land on the edge of existing urban areas where sustainable growth is being focused has clear hope value and is therefore typically not for sale for low-value open space and recreation uses. The clear and obvious way forward is to select specific housing sites as a focus for growth around the City of Norwich that are sufficiently large to accommodate this shortfall and open space requirement and to make open space delivery (quantum, type, equipment required and phasing) a requirement of the allocation. I would direct you to my clients' previous representations submitted in response to the previous call-for-sites and the accompanying Supporting Representation document entitled Green Infrastructure Strategy dated July 2016 that outlines a comprehensive delivery strategy.

3. Representations on behalf of *Glavenhill Strategic Land; Dennis Jeans Properties*

We support a **variation of option NC1** where specific housing, employment and a new garden settlement in the Cambridge-Norwich hi-tech corridor are chosen to deliver large

areas of strategic green infrastructure. My clients have already made detailed representations promoting a number of sites at Rackheath (to the north of the proposed site), Salhouse, Barford, Caistor St Edmund, Mulbarton, Hethel (the new garden village site) and the land south of Norwich Road (that extends the site being promoted to the north) to deliver a network of new large green spaces including Country Parks linked to housing and new settlement delivery.

We consider that the blanket application of option NC1 as an enlarged fixed open space requirement to be delivered on all new housing sites regardless of location, context, scale and viability will not deliver the quantum, or quality, of strategic green infrastructure needed to meet existing shortfalls or offset the impact of planned new housing growth on the Natura 2000 sites (including the Norfolk and Suffolk Broads) quickly enough. This over-and-above requirement will only serve to frustrate development on viability grounds. Furthermore, this new dispersed network of extra green space on housing sites in conjunction with Whitlingham County Park will also not be sufficiently attractive to mitigate against the inevitable recreational impacts of new growth on the North Norfolk Coast SAC, SPA and Ramsar, The Broads SPA and Broadland SPA and Ramsar. This is evident through the on-going application of a similar extra green space policy in Broadland District Council area that is doing very little to meet overall open space targets/existing deficiencies within the Norwich Policy Area.

We further consider that the pooling of offsite payments as proposed under **option NC2** will also not work for the same reasons. The problem being that land on the edge of existing urban areas where sustainable growth is being focused has clear hope value and is therefore typically not for sale for low-value open space and recreation uses.

The clear and obvious way forward is to select specific housing sites as a focus for growth around the City of Norwich that are sufficiently large to accommodate this shortfall and open space requirement and to make open space delivery (quantum, type, equipment required and phasing) a requirement of the allocation in order to provide meaningful Green Infrastructure.

4. Representation on behalf of *Nigel Hannant*

Lanpro supports a **variation of option NC1** where specific housing, employment and new garden settlement sites are chosen to deliver large areas of strategic green infrastructure.

Lanpro considers that the blanket application of option NC1 as an enlarged fixed open space requirement to be delivered on all new housing sites regardless of location, context, scale and viability will not deliver the quantum of strategic green infrastructure needed to meet existing shortfalls or offset the impact of planned new housing growth on the Natura 2000 sites (including the Norfolk and Suffolk Broads) quickly enough. This over-and-above requirement will only serve to frustrate development on viability grounds. Furthermore, this new dispersed network of extra green space on housing sites in conjunction with Whitlingham County Park will also not be sufficiently attractive to mitigate against the inevitable recreational impacts of new growth on the North Norfolk Coast SAC, SPA and Ramsar, The Broads SPA and Broadland SPA and Ramsar. This is evident through the on-going application of a similar extra green space policy in Broadland District Council area that is doing very little to meet overall open space targets/existing deficiencies within the Norwich Policy Area. We further consider that the pooling of offsite payments as proposed under option NC2 will also not work for the

same reasons. The problem being that land on the edge of existing urban areas where sustainable growth is being focused has clear hope value and is therefore typically not for sale for low-value open space and recreation uses.

The clear and obvious way forward on a strategic level is to select specific housing sites as a focus for growth around the City of Norwich that are sufficiently large to accommodate this shortfall and open space requirement and to make open space delivery (quantum, type, equipment required and phasing) a requirement of the allocation.

OPTION NC2

Brundall Parish Council supported Option NC2 without making any additional comment.

Comments from parish and town councils, statutory bodies and other organisations **in support of Option NC2** included:

1. *Colney Parish Council* - Significantly increasing the levy on developers to provide for community amenities beyond the S 106 envelope (p. 100)
2. *Environment Agency* - We would recommend that measures are in place to protect any UKBAP priority Habitat identified under the Natural Environment and Rural Communities Act 2006. By affording adequate levels of protection to existing green infrastructure, long term benefits will include: Maintaining the character of the landscape
 - Reducing further habitat fragmentation, and providing opportunities to reconnect existing fragments.
 - Preserving remnant vegetation and seedbank of existing local species.
 - Protecting River Corridors and wetland habitat.
3. *CPRE Norfolk* - Option NC2 –and in general we argue that a comprehensive development contribution for community and nature betterment be an intrinsic part of the Plan

Other comments in support of Option NC2

4. Housing developers may be slow to provide additional green space, whereas under option NC2 *payments* can be requested and, if absolutely necessary, a stop notice could be issued if a developer fails to comply. The LA is, therefore, in control. However, the LA must be certain to ring fence the payments to ensure they are used for their intended purpose.
5. The natural green spaces on their developments are unlikely to be very green or suitable.
6. There should be absolutely no development on designated conservation sites. No mitigation measures will ever compensate for the destruction, through development, of species of animal or plant. The existing connections on these designated species can never be re-created by any "green" compensation measures.
7. I can't see how sufficient facility would be provided on-site.
8. Allows most flexibility to those best placed to assess optimal solution.
9. Development contributions to improvement of environment should be compulsory.
10. Support Option NC2 – which should be read in concert with my representation on the creation of a Norwich Greenbelt via a 'commons' approach.

The following representations argue for a **combination of both options**.

1. *Pigeon Investment Management Ltd* on behalf of the promoters of Site GNLPO352 (land at Brecklands Road, Brundall) and GNLPO353 (Land at Dereham Road, Reepham)

Pigeon consider that the Local Plan should combine the two approaches for provision of green space to offset/mitigate impact on designated nature conservation sites. The Local Plan should enable the application of both approaches, for instance development should include on-site provision, or if this is not favoured offer an off-site/in lieu payment instead of on site provision. Fundamentally the approach should encourage a package of measures to be brought forward to deliver nature conservation and green infrastructure.

2. *Natural England* - We would strongly prefer to see a single broader policy that encompasses, and allows for, a mix of measures from both of the possible options to be selected, depending on the predicted impacts of a proposed development on designated sites (whether these are CWSSs, SSSIs, SPAs, SACs or Ramsar sites). New smaller developments may have limited scope to incorporate new GI on site and so will need to contribute financially to off-site new GI. New larger sized developments will need to provide a range of GI measures on site, including accessible open green space including dog exercise areas, and connectivity links to the existing PROW network, and contribute off-site to mitigating the impacts on designated sites. Specific measures need to be identified for each site allocation where appropriate. All development should make a financial contribution towards monitoring costs. The Borough Council of Kings Lynn and West Norfolk's adopted Site Allocation Plan takes this approach.

We question why the Reasonable Alternative NC3 (identified in the SA) has not been included in the Growth Options consultation under Q53 as it has the highest positive score of the three options

Natural England advises that the following additional policy wording, or similar, is included:

'Developments that are likely to have an adverse effect, either alone or in-combination, on European designated sites must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoiding or mitigating against impacts where identified. Mitigation may involve providing or contributing towards a combination of the following measures:

- i. Access and visitor management measures within the SAC;
- ii. Improvement of existing greenspace and recreational routes;
- iii. Provision of alternative natural greenspace and recreational routes;
- iv. Monitoring of the impacts of new development on European designated sites to inform the necessary mitigation requirements and future refinement of any mitigation measures.
- v. Other potential mitigation measures to address air pollution impacts e.g. emission reduction measures, on site management measures.'

Reference should be made in the policy to enhancing existing GI and biodiversity to reflect the Plan's vision and objectives.

3. *Norfolk Wildlife Trust* - In our view there should not be two opposing alternatives but a policy that is flexible in order to allow for measures from either alternative and for additional measures. New development may need to provide for a mix of measures including new green space on site, GI links to the surrounding PROW network and mitigation of impacts on designated sites (both European protected sites and nationally and locally designated sites. This approach has been followed in the adopted Site Allocation Plan Kings Lynn and West Norfolk Local Plan. In this context it is important to recognise that impacts may not only be on the Broads National Park but on other internationally and nationally designated sites (e.g Buxton Heath and other components of Norfolk Valley Fens SAC) and on County Wildlife Sites. Although, we understand that more local elements of biodiversity enhancement such as green roofs are best addressed in the Development Management policies of the LPAs, it would be useful in the accompanying text to make reference to the value of enhancements such as this in providing connections along recognised GI corridors in urban areas. In this context, this type of measure is more than biodiversity enhancement but is potentially a key component of the GI of the urban area.
4. *Hainford Parish Council* - A combination of both would be preferable,
5. *Otley Properties represented by John Long Planning* - considers that the Local Plan should combine the two approaches for provision of green space to offset/mitigate impact on *designated* nature conservation sites. The Local Plan should enable the application of both approaches, for instance development should include on-site green space provision, or if this is not favoured offer an off-site/in lieu payment instead of on site green space provision.

The following representations argue for **neither option**

1. *Climate Hope Action in Norfolk* - Neither. Both of the options offered allow for housing at designated nature conservation sites which should be avoided. Simply providing new green spaces within the development does not diminish this impact. The focus should not just be on providing the local population with a green space, although this is important. Ecosystems cannot just be relocated. The UK is facing catastrophic decline in pollinators. Data to 2014 show 32% of species in decline with 10% showing strong decrease (Joint Nature Conservation Committee Biodiversity and Ecosystems services report). Pollination by insects enables the reproduction of flowering plants and is critical to agriculture, of major importance to the local area, as well as obviously to food security. Bird populations (a good indicator of the broad state of wildlife) are also in decline, particularly farmland and woodland birds (DEFRA 2017). All efforts should therefore be made to protect and where possible expand conservation areas. Neither of the provided options appears to address this.
2. *Pegasus Planning Group on behalf of Peter Rudd and the Trustees of Arminghall Settlement* - The application of either option needs to be ensure that it includes criteria to confirm when it is applicable. The need for either requirement must be fully justified and necessary to make the development acceptable and this is not catered for in the options presented. As such, both options will need to be amended to allow both the specifics of the development site location to be considered and the specifics of the development proposed. The final option should also allow for either commuted payments in lieu of provision or on-site provision (or a combination of

the two) – the current options each only allow for one scenario. For that reason, it is not appropriate to choose between the two options.

3. *CODE Development Planners on behalf of Bullen Developments (Longwater and NRP); Drayton Farms Ltd/RG Carter ; Ben Burgess Ltd*

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

4. An individual respondent stated that neither [option is really appropriate], as housing development can be adequately catered for without locating near designated sites. One considers that social and environmental factors are well down the importance scales to that ascribed to 'economic' benefit.

DRAFT

Question 54

Do you think any changes should be made to the Green Infrastructure network?

A total of 64 separate responses were received to this question. Of these, 44 considered changes to the green infrastructure network were necessary, 15 did not. Five respondents did not answer either Yes or No but provided additional comments

Summaries of specific comments

Comments from parish and town councils, statutory bodies and other organisations who **supported changes to the GI network** included:

1. *Costessey Town Council* - Text should be expanded to include "river valleys and their tributaries".
2. *Brundall Parish Council* - More emphasis on cycleways and footpath links for every development.
3. *Great and Little Plumstead Parish Council* - The questions are largely irrelevant as the policy asks for "mitigation and adaption" to climate change. As noted earlier this is a reactive policy. As to protection, the existing green infrastructure ambitions and open space provision are not being maintained or are being "sold off" in planning permissions. All one can ask for is for these policies to be expanded and special areas e.g. the Wensum and Tud Valleys or older Parklands to be protected and then for Planning Committees and Officers to hold their ground against development pressures.
4. *Scole Parish Council* - Major river immediate environs should automatically be a "conservation area" subject to special policies for any development. Any development which could cause harm should be automatically rejected. Any avoidable pollution threat must be treated as a priority (including water extraction which threatens the health of the river). This should be a cross County boundary policy in the special case of the Waveney Valley and its environs.
5. *Cringleford Parish Council* - Preservation of Yare Valley and protected zone along A47
6. *Kimberley and Carleton Forehoe Parish Council* - green space is needed near residential developments.
7. *Bramerton Parish Council* - Extend to create safe routes out of the city to the service villages.
8. *Framingham Earl Parish Council* - Giving stronger protection to the major nature conservation sites, which are in themselves a tourist attraction.
9. *Poringland Parish Council* - More cycle paths.
10. *Diss and District Neighbourhood Plan Steering Group* - The principal rivers and the more important tributaries, bogs, fens, water meadows and marshes should automatically be designated special areas and well protected against any development or other operations such as water extraction that might negatively impact on them. Likewise ancient and native woodlands, field systems and suchlike should be protected from all development while the network of green roads should be protected from misuse. Traditional footpaths and bridleways should be better supervised and made more accessible than many are at present, with new routes added to suite patterns of development and movement. Historic commons and green spaces should also be protected with development not allowed to encroach on or enclose them.

11. *Natural England* support the continued development of the GI network incorporating new information and cascading the network down to a more local level. However, it is questionable whether the GI funding provided to date has been skewed more in favour of delivering the access and sustainable transport components of GI at the expense of biodiversity and ecological networks.
- Whilst the existing definition of GI in the JCS could be carried forward into the new plan, it would be worth considering whether the following text provides a better explanation and would allow a more balanced GI network to be achieved over the GNLP area:
Green Infrastructure is the strategic network of multi-functional, linked green and blue spaces, both new and existing, urban and rural, which delivers a range of benefits for people and wildlife. The network is formed by individual green infrastructure components at different scales, from street trees, green roofs, and sustainable drainage, to allotments, nature conservation sites and country parks. These assets may be physically and visually connected to one another by linear features such as hedgerows, public rights of way, cycle routes, rivers and watercourses to form a green infrastructure network.
 - Individual elements of the green infrastructure network can serve a useful purpose at a range of scales without being connected. However, when green infrastructure components are linked together to form green networks, further combined benefits can be achieved at a strategic level. These direct and indirect benefits of green infrastructure have been termed 'ecosystem services' and are derived from physical natural assets known as 'natural capital'. Development can impact on the extent and ability of natural capital to provide ecosystem services. To ensure that these benefits are delivered, green infrastructure must be protected, well planned and managed.
 - However, the way that GI policies in the JCS have been monitored has not produced a clear picture of the effectiveness of the policies as only data from infrastructure projects is gathered. In future, information on both gains/enhancement of GI and losses/damage (for instance, where development has taken place on a GI corridor) for planning applications, as well as infrastructure projects, should be collected as part of the annual monitoring of the Plan.
12. *Environment Agency* - Nature Conservation, Green Infrastructure and Habitats Regulation Assessment Mitigation. All future development should include green infrastructure, and you may wish to consider introducing a requirement to allocate a percentage of any site to such features. This could form part or all of the required open space provision. With adequate design these green spaces could incorporate SuDS attenuation ponds or wetlands, open green space for walking, and provide important wildlife corridors within and between development sites. The policy does not currently include anything about protection afforded to existing green infrastructure on development sites. This should be in place to ensure that there is no net loss of existing habitat in any new development. We would recommend that this include hedgerows, single standard trees, and natural ponds.
13. *Historic England* - Landscape, parks and open space often have heritage interest, and it would be helpful to highlight this. It is important not to consider 'multi-functional' spaces only in terms of the natural environment, health and recreation but to also

- recognise their heritage value. It may be helpful to make reference in the text to the role GI can have to play in enhancing and conserving the historic environment.
14. *NHS Norwich CCG* - Take into account health and social care needs including accessibility for all, including the disabled and those with impairments. Easy walk areas should be created to encourage a diverse range of the population to adopt healthy living principles. Landscaping should be used to support increased use by a wide range of the population and to improve mental health amongst the general population.
 15. *Norfolk Wildlife Trust* - The Local Plan should give greater weight to ecological enhancement side of GI and cycle and pedestrian links should in themselves be green with for instance green bridges, cycle routes along green lanes and hedge planting alongside new footpaths. In addition, GI both gains/enhancement and losses/damage (for instance, where development has taken place on a GI corridor) should be monitored as part of annual monitoring of the Local Plan. This should include information from planning applications in addition to that already gathered on infrastructure projects.
 16. *CPRE Norfolk* wish to advocate the establishment of a Greenbelt including green river wedges and green corridors. In addition parks, nature pockets, community nature initiatives, and greenery around hospitals, care homes and hospices should be included within the Green Infrastructure network.
 17. *The Woodland Trust* - the consultation with stakeholders revealed concern about the lack of natural greenspace, which would include woodland. You may wish to refer to the Woodland Trust's Access to Woodland Standard in calculating how much new woodland may be needed. Currently our standard shows that only 17% of people in Norwich have access to a wood of at least 2ha in size within 500 metres of their home and you could aim to increase this figure to a stated percentage through new woodland creation. Look to plant replacement trees or you may suffer a major loss of tree cover.
 18. *RSPB* support the delivery of an integrated and up-to-date GI strategy. Within it, there should be a clear mechanism that reports on the delivery of targets which it has set out to achieve. We consider that the key means to avoiding increasing pressure on designated sites will be through provision of high quality green space close to people's homes and at a scale that is appropriate to the level of planned growth. One of the main pressures identified on designated sites is dogs' off-lead.
 19. *Climate Hope Action In Norfolk* - There is an urgent need for updating, particularly in the light of continued decline in wildlife due to climate change and other factors. To date the development of projects such as the NDR, which is apparently intended to be extended across the Wensum Valley, suggest that insufficient weight is being given to these issues in terms of planning. The Broads, an area recognized nationally as of significant importance and which has statutory protection, is at serious risk given projected sea level rise. This does not seem to be mentioned in terms of mitigation or adaptation.
 20. *Norwich Green Party* - Give weight to more recent national strategies and policy guidance incl. NPPF, 'Biodiversity 2020' (2011). All GI projects should benefit wildlife, be designed to include features that result in a net gain for biodiversity and the enhancement of ecological networks such as green roofs and walls. Increasing

tree coverage should be viewed as strategically important, GI could be covered in the Annual Monitoring Report.

A number of landowners and agents **promoted the delivery of new green infrastructure**, as part of specific development sites being promoted

21. *Lanpro Services Ltd* on behalf of *the promoter of site GNLP0487* (Land North of Norwich Road, Salhouse); *the promoter of site GNLP1054* (Land off Manor Road, Newton St Faith); *Dennis Jeans Properties*; *Silfield Limited* and *Glavenhill Strategic Land*.

Lanpro support an expansion of the existing GI network around Greater Norwich through an alternative approach focused around the delivery of new large housing allocations enabling the linked delivery a network of new Country Parks as a properly costed requirement of development. We have assembled a number of sites in the following locations that are fully costed and can deliver the following as dedicated mixed-use allocations:

- Barford (circa. 150 dwellings delivering 29ha);
- Horsham St Faith (circa 70 dwellings delivering 8.95 ha);
- Rackheath (circa. 300 dwellings delivering 32ha);
- Salhouse (circa. 90 dwellings delivering 7ha);
- Hethel (circa. 2000 dwellings as a new garden village delivering 73ha);
- Mulbarton (circa. 180 dwellings delivering 10ha); and
- Caistor St Edmund (circa. 300 dwellings delivering 24.5ha).

This linked housing and new strategic green infrastructure approach will deliver circa. 175.5 hectares of new green infrastructure and open recreational spaces in the form of Country Parks for public use.

22. *DLPB Ltd* on behalf of *the promoter of Site GNLP0442* (Racecourse Plantation, Sprowston)

We support the current GI as set out in the JCS and the proposed changes that will allow for the expansion of this network. However, considering the status of the site (Ref: GNLP0442) with no formal public access, limited private recreation, generally unmanaged woodland structure and on-going forestry activity, it is clear that the function of these Green Infrastructure assets are significantly restricted. The appeal scheme will improve the multifunctional role of these GI assets.

23. *Lanpro Services Ltd* on behalf of *Nigel Hannant*

Smaller sites coming forward with an over provision in GI, such as the one detailed in this representation, can also provide habitat connections and extra recreational space for the new and existing residents. It should not be necessity for smaller sites to over deliver on GI but the policy should be worded to encourage it.

Other comments supporting changes to the GI network included

24. The inclusion of heathland as a landscape, projects to preserve and restore such heathland habitats should be required as development on the Poringland Heath has compromised it almost to extinction.
25. Extend protection of all river valleys, sensitive areas including the Yare, Tud and Tas valleys and the countryside to the north west of Norwich.
26. Policy needs to be strengthen that gives greater weight to GI in all new development (including public realm), with specific reference to green roofs and walls and 'green'

SuDS, and stressed the many benefits (improving air quality and drainage, increasing amenity value, reducing urban heat island effect etc.)

27. Parks, nature pockets, community nature initiatives, and greenery around hospitals, care homes and hospices should be included within the GI network. These are all vital ingredients for public health and well-being across the region.

Comments from parish and town councils, statutory bodies and other organisations who **argued for no change to the GI network** included:

1. *Pigeon Investment Management Ltd* on behalf of the promoters of site Ref GNLPO353 (Land at Dereham Road, Reepham)

No specific changes to the GI Network but the Local Plan should look favourably on-site promotions that offer opportunities to improve to the GI network.

2. *CODE Development Planners Ltd* on behalf of *R.G. Carter/Drayton Farms Ltd; Ben Burgess Ltd; Bullen Developments (Longwater and NRP)*.

The GNLP is not the appropriate process or plan in which to introduce changes to the approach to protecting designated sites. Policies for the provision of additional GI space are contained in the Development Management policies Local Plan . According to paragraph 1.25 of the Growth Options document, the GNLP will not amend existing adopted Development Management policies. If these policies are to be changed in the GNLP process there would need to be much greater transparency and a whole new level of evidence gathering. The extent of the Green Infrastructure network is also, in some cases shown in Area Action Plans, including in the Growth Triangle AAP. According to paragraph 1.26 the future *role* of the adopted AAPs for Long Stratton, Wymondham and the North East Growth Triangle and Neighbourhood Plans will be considered in plan making. If there is a possibility that the GNLP will seek to change the Green Infrastructure network this should be made clear now and consulted upon properly. Designation and delivery of GI sites affects individual landownerships and communities and it would be unreasonable to exclude those stakeholders from participation.

3. *Thorpe St Andrew Town Council* - No changes necessary.
4. *Salhouse Parish Council* - We need more detail to decide.

Other Comments

Otley Properties Ltd did not wish to comment on this matter at this stage, but reserved the right to do so at later stages if necessary.

Question 55

Which of these options do you favour (for landscape protection)?

Option LA1 – Retain the current South Norfolk Local Plan approach, extending the principles to those parts of Broadland closest to Norwich, including the route of the Norwich Northern Distributor Road.

Option LA2 – Retain the general current approach to landscape protection in the current three separate local plans

This question had 64 responses with about two thirds in favour of option LA1. A number of those that supported the option wanted to see more consideration of river valley protection incorporated in a policy. The Wensum, Waveney and Tud were specifically identified.

Summaries of specific comments

Option LA1

Specific bodies/organisations made the following comments **in support of Option LA1**:

1. *Costessey Town Council* - Text should be expanded to include “river valleys and their tributaries” e.g. R Tud, R Tas, R Tiffey. A statement re the character of river valleys: there should be a presumption AGAINST development in river valleys. There should be a re-designation of the river valleys – especially at Farmland Road, Costessey so the policy is consistent. The river valley boundary should follow the edge of East Hills Woods round past the bottom (northern end) of Farmland Road or at least a designated distance from the river if not the contour lines or escarpment to escarpment. The designated river valley should be extended up to Hall Drive, south of the R Tud in Costessey. The River Valley policies and designation should be linked / cross referenced with the People and Places document and extended into Broadland and Norwich.
2. *Diss and District Neighbourhood Plan Steering Group* - It appears that insufficient regard is being paid to the Waveney Valley which, apart from being developed right to the northern bank of the river as it flows through Tottington and Roydon, is open landscape on the southern side and on both sides to *the* west and east of Diss. The current designation of the valley slope to the south through Mid Suffolk is a Special Landscape Area and it has its own categorisation within the Suffolk CC Landscape Assessment: <http://www.suffolklandscape.org.uk/>. Both counties and LPAs should co-operate to develop clear, consistent and common approaches to the designation and policies for the protection of this shared historic landscape.
3. *Scole Parish Council* - We feel *the* River Waveney is a key landscape area that should be protected.
4. *CPRE Norfolk* - The creation of a Green Belt for Norwich on the basis of ‘green wedges’ as outlined in our response to question 31 should be included within the options for this question. Instatement of a Green Belt would simplify as well as strengthen current designations. We support LA1. But we note that the *landscape* character of the Yare Valley was violated by a planning decision favouring the development of sports grounds and a large sports pavilion in the heart of this protected valley. Hence we ask for a stronger version of LA1 with scope for

contributions by developers to enhance landscape character and community accessibility for all designated landscapes.

5. *DLBP Ltd* - We consider Option LA1 to be the favoured option for the protection of landscape character because this presents a consistent approach. We agree that maintaining the setting of Norwich in relation to its rural hinterland is important, but that development may still be appropriate subject to the sensitivity of the area being recognised. The proposal at Racecourse Plantations will contribute to the multi-functional network of green spaces and green links connecting to Norwich and the rural hinterland as envisaged in the Growth Triangle Area Action Plan. We also agree with the Growth Options document that a “hierarchy” approach to policies should be practised, reflecting the distinctions between national and local landscape designations, but with the protection of landscape character applying to both local and national designations. In this context we consider that local level landscape character should not be over protected.
6. *Great and Little Plumstead Parish Council* - Extension of the landscape protection and approaches principles, although it did not stop the impending disaster of the FEZ and LDO desecration of farmland overlooking and impacting upon the River Tud near Easton, primarily because this was *promoted* by Broadland DC rather than South Norfolk DC who at the moment have different policies regarding landscape.
7. *Cringleford Parish Council* - Support LA1, but it must be consistent and enforceable.
8. *Kimberley and Carleton Forehoe Parish Council* - LA1 – with massively reduced housing development numbers – 500 per year not 2000. The sensitivity of areas needs to be recognised.
9. *Salhouse Parish Council* - More unified approach is better
10. *Natural England* - Retain the current South Norfolk Local Plan approach, extending the principles to those parts of Broadland closest to Norwich, including the route of the Norwich Northern Distributor Road. *This* could help provide consistency across the districts for developments affecting the nationally protected and important landscapes of the Broads, and its setting.
11. *Framingham Earl Parish Council* - LA1 as this seems to recognise the landscape and offer a certain amount of protection.

Specific comments from members of the public **in support of option LA1** were:

1. Best practice and consistency. The SNLP appears to be working well, if it ain't broke don't fix it
2. Landscape protection needs to be strengthened and it makes sense to bring it together, rather than looking piecemeal at different areas under different local authorities.
3. Maintaining the rural setting of the City is important in generating a nice place to live and work. Maintaining the strategic gaps and routes is important as “impressions are formed on first approaches”.
4. The preference is for option LA1 protected by making the areas as designated part of a green belt wedges solution. Currently LPA's are not strictly enforcing protection of the river valleys as demonstrated by the permission of South Norfolk for an A3 commercial facility as part of a large sports pavilion at Colney with the attendant significant increase in traffic.
5. Wide publicity needs to be given to ‘Valued Landscapes’ as the procedure is not widely known and often is wider than parish boundaries. The problems for Norfolk is

that much of its beauty is in the words of Lord Byron “tame and domestic” but beauty nevertheless and its understatement makes it difficult to protect – just another green field.

6. The elephant in the room is the NWL crashing through the Wensum and Tud Valleys, Royal and Ringland Hills. Don't fall for the artist's impression of an elegant viaduct that makes no noise, light intrusion or pollution. It needs to be assessed as part of the GNLP.
7. It seems Broadland is getting a lot of attention but in South Norfolk, The Waveney Valley is an area of natural beauty and needs protection for the well-being and enjoyment of residents and visitors.

Option LA2

Of those that supported option LA2 a number of respondents cited reasons being a lack of evidence to extend existing Norwich Southern Bypass landscape policies to the Northern Distributor Road.

Specific bodies/organisations made the following comments **in support of Option LA2**:

1. *Broads Authority* - Page 108, landscape. The Broads Authority has looked into the settlement fringe issue. Please see our policy and work completed with Great Yarmouth Borough Council and Waveney District Council.
2. *Pigeon Investment Management Ltd on behalf of clients*- Pigeon consider that out of the two options, Option LA2, which is to retain the general current approach to landscape protection in the current three local plans is preferred.
3. *John Long Planning on behalf of Otley Properties* - Otley Properties Ltd considers that out of the two options; Option LA2 is preferred, which is to retain the general current approach to landscape protection in the current three Local Plans.
4. *CODE Development Planners Ltd on behalf of Ben Burgess, R.G Carter, Drayton Farms and Bullen Development* - Of the two options identified as reasonable alternatives, we favour Option LA2. Landscape protection policies are not just contained in the JCS and various Site Allocation documents. Some are contained in the Development Management Policies Local Plan and AAPs. According to paragraph 1.25 of the Growth Options document, the GNLP will not amend existing adopted Development Management policies. Additionally, according to paragraph 1.26 the future role of the adopted AAPs for Long Stratton, Wymondham and the North-East Growth Triangle and Neighbourhood Plans will be considered in plan making. If there is a possibility that the GNLP will seek to adopt a similar approach to that adopted in the current South Norfolk Local Plan, designating large areas on either side of the main circulatory road for landscape protection with newly worded policies and explanatory texts this should be made clear now and consulted upon properly. Changes to policies and designations would affect individual landownerships and communities and it would be unreasonable to exclude those stakeholders from participation. In addition, the circumstances which apply to South Norfolk and applied when the Bypass Landscape Protection Zone was first introduced requires interrogation before it is simply and blindly adopted to apply to an entirely different road with very different features.

Neither Option

There were a number of responses that did not favour either option. These responses objected to both approaches in the basis that they are considered too restrictive and the issues could be tackled by allocating more land to relieve development pressure in sensitive landscape areas.

Specific bodies/organisations who supported **neither option** made the following comments:

1. *Lanpro Services Ltd on behalf of Glavenhill Strategic Land, Silfield Limited and MAHB Capital and other clients*- Lanpro understands the need to protect sensitive landscapes and river valleys but these landscapes are generally subject to existing other levels of protection. We also understand the need to prevent coalescence between existing settlements to protect townscape character and to enable resident populations to have direct access to countryside recreation and benefits. Nevertheless, we object in the strongest possible terms to approaches outlined in options LA1 and LS2 especially the protection of the route of the NNDR that has no real landscape merit (one of the key reasons the route was selected and evidenced in the original submission documents) and is designed to facilitate access to new future planned growth areas. Both approaches favour the blanket application of Green Belt-type constraint policies for no valid landscape and/or planning reasons when (due largely to a lack of brownfield land supply within the City) the outward expansion of Norwich into the fringe parishes is inevitable. Indeed, the current growth strategy for Norwich as contained in the adopted Joint Core Strategy acknowledges that the Norwich Policy area that is the countryside beyond the existing urban edge is the most sustainable location for new housing and employment growth. Lanpro favours a new option that seeks to deliver a proper planning approach to development and one that allocates sufficient deliverable and viable housing and employment sites to meet real-time needs (including City Deal growth requirements) rather than the current strategy that seeks to underprovide for all the wrong reasons. This is the most appropriate way to take the development pressures off the higher value fringe parishes beyond the outer edge of the City.

Question 56

Should the GNLP protect additional Strategic Gaps and if so where should these be?

There were a total of 70 individual responses to this question. 47 supported protecting additional Strategic Gaps, 17 did not and six respondents either stated they did not wish to comment or made additional comments.

The majority of respondents supported additional strategic gaps, although one commented these should be subject to review. A theme that came through strongly was the protection of river valleys and respondents identified the Tud, Wensum, Waveney, Tas and Yare. Gaps to protect the Norwich fringe were felt to be important with areas specifically mentioned for strategic gaps to prevent coalescence being:

- Easton
- Old/New Costessey
- North West Norwich
- Norwich fringe villages

Other areas that were felt would benefit from strategic gaps were;

- Wymondham / Hethersett
- Harleston / Starston
- Poringland and surrounding villages
- Diss and surrounding villages.

A number of respondents did not give any examples of locations but there seemed to be a view that if was appropriate in South Norfolk then it would also work in Broadland and similar criteria should be applied. **One respondent stated that with the unlikelihood of being granted any green belt they are the only tool left to ensure urban sprawl is restricted.**

Specific comments **in support of strategic** gaps included;

1. *Costessey Town Council* - The strategic gap should be extended so includes the gap between Old and New Costessey; along the R Tud Valley and all the tributaries of the R Wensum and R Yare. Policy DM 4.7 should be revised to include these revised river valley boundaries and also the historic Costessey estate.
2. *Diss and District Neighbourhood Plan Steering Group* - The River Waveney and its environs must be treated as a Strategic Gap except where there are clear reasons otherwise, such as the *creation* of new road links to relieve congestion along the A1066. The Diss and District Neighbourhood Plan Steering Group's Governance arrangements secure the continuation of each settlement's heritage, individual characteristics and separation between them.

3. *Scole Parish Council* - There should be strategic gaps between Diss and its associated rural villages to ensure the historic distinctiveness and independence of the villages. The River *Waveney* provides a natural strategic gap.
4. *Hainford Parish Council* - North of the NDR
5. *CPRE Norfolk* - The instatement of a Green Belt would be likely to include further strategic gaps, although there may be no need to define them as such given the various legislation and *policies* relating to Green Belt land.
6. *Hethersett Parish Council* - It is vitally important that the strategic gaps between Hethersett and Wymondham and Hethersett and Cringleford are maintained. There is already evidence of 'strategic gap creep'. Without this provision there will just be urban sprawl from Norwich to *Wymondham* with all of the recognised infrastructure provision issues.
7. *Norwich Green Party* - Our response to question 13 on the designation of a Greenbelt *answers* this question, however, I will repeat the key information here:
 We think it is important that areas are identified that are unsuitable for growth so that they can be planned positively for rural uses, and as strategic gaps, rather than always being urban-sprawl-in-waiting.
 We think it is important that Norwich's suburban areas and neighbouring towns and villages retain their unique identities where they have them, and don't just become dormitory towns for an expanded Norwich conurbation. As such, we feel that it is important to retain a distinct separation:
 - Along the Yare valley, between Norwich itself and the suburban village of Cringleford;
 - Between the A47 and Hethersett, so that the urban boundary is contained within the A47. Wymondham and Hethersett can then be seen as settlements in their own right, beyond Norwich;
 - along the Wensum/Tud valley between Bowthorpe/Easton/Costessey and Taverham/Drayton/Hellesdon – to allow each of these settlements to have an identity in their own right, rather than be seen as the Western sprawl of a Norwich conurbation;
 - Along the Green Infrastructure corridor between Sprowston and Heartsease (GT2 in Broadland's local plan). This is particularly important to ensure that Mousehold Heath doesn't become even more "landlocked" than it already is. This would also prevent the North-East Growth Triangle becoming a single mass of urban sprawl on the Eastern side of the city;
 - Along the GT2 landscape buffer between Norwich and Rackheath;
 - Between Norwich and further development to the south. Norwich, if unrestricted at Trowse, could end up swallowing Trowse Newton completely, in much the same way that one could argue it already has done at Eaton village

Several of these strategic gaps are particularly sensitive areas of countryside that need to be preserved either because of their special ecological significance, or because of their importance for the rural economy. In particular:

- The Broads and Wensum Valley East of the city – It almost goes without saying that Norwich's proximity to the Broads could threaten some parts of the Broads character. In particular the area around Whitlingham, where the broads and the city meet.
- The Wensum and Tud river valleys to the west of Norwich has special significance for biodiversity, as well as an important area for leisure for those who live to the west of the city.
- The Yare river valley – This again is an important habitat for wildlife, as well as providing leisure land for those who live to the South of the city and in nearby villages.
- The wider countryside around the city is threatened by unchecked sprawl. Other bodies or individuals will have more knowledge than ourselves as to the significance of each area, but Norwich is a city set largely within a rural county, it would change the character of the city significantly if such countryside moved further and further away from the centre of the city (see next point).

Allocating strategic gaps can also have the effect of preserving the setting and special character of historic towns. Whilst I'm sure there are experts who could give much more detailed accounts of their distinctiveness in each particular case, we think particular regard should be given to:

- Norwich itself – Whilst the character of Norwich is obviously a lot more urban than it used to be, it still retains a lot of its character because of its nature as a compact city in close proximity to the countryside. The experience of Norwich as such is threatened unless some areas of land are designated as countryside indefinitely, rather than constantly being development-land-in-waiting.
- Trowse Newton – whilst a small village, Trowse has a distinctive character in part because it is separate from Norwich. As a village within a Norwich Greenbelt, this village would gain the protection of its setting, as well as the village conservation area itself.
- Bawburgh – again a small village set within a river valley, this village's character could be threatened if the boundary of Norwich encroaches on it. At present, the fact that there is a significant break (albeit interrupted by the A47) between Three Score and Bawburgh contributes highly to this character.
- Ringland – this area benefits from significant landscape character that would be wholly destroyed by encroachment of development, and indeed by a Western Link Road across the Wensum Valley.
- Costessey – whilst New Costessey has certainly become a suburb of Norwich, the old part of Costessey still retains a strong character, which is partly due to its proximity to open countryside and the Wensum valley. By designating the Wensum and Tud Valleys as Greenbelt, the setting of old Costessey as a village separate to Norwich could be retained

We are sending a map to accompany our answer to question 13 that identifies possible Greenbelt boundaries for the area close to the city, which includes the location of the strategic gaps that we have identified. We do not have the local knowledge of the areas beyond the boundaries of this map, and suggest that you take guidance from any responses received in support of a greenbelt and strategic gaps from respondents in those areas. We have also left some boundaries vague where we are unsure of the local conditions that would suggest other boundaries.

Even if a greenbelt is not designated, we would like to stress the importance of these strategic gaps that must then be protected in other ways.

8. *Starston Parish Council* - Yes, between Harleston (a market town) and Starston (a rural village in close proximity to Harleston). The reason for this is that Starston parishioners when consulted about planning, housing and development for the Parish Plan 2008, (95% response rate), stated that they did not want to see Starston absorbed into Harleston as a result of large scale housing development between the two currently distinct communities (see page 11 at <http://2015starstonvillage.co.uk/starston1/wp-content/uploads/2015/08/starston-plan-spreads-ilovepdf-compressed-ilovepdf-compressed-1.pdf>) This view is still held strongly by residents today. It was reflected in the Parish's response to the 2017 Local Government Boundary Commission Review (LGBC). The national review body listened to the request from Starston Parish Council, supported by our District Councillor that Starston remained in a ward with other rural parishes, rather than become incorporated into a ward with our local market town Harleston, as proposed by South Norfolk District Council.
9. *Cringleford Parish Council* - Support SG1, if correct enforcement.
10. *Kimberley and Carleton Forehoe Parish Council* - SG1 – should not fall short – building should not be *allowed*. Protection of strategic gaps is imperative.
11. *Salhouse Parish Council* - Yes Between all settlement boundaries
12. *Thorpe St Andrew Town Council* - *access* and views across the river should be retained.
13. *Climate Hope Action In Norfolk* - Strategic gaps should have more rigorous protection to prevent conversion to farmland and housing. This should be considered in conjunction with the green *wedges* proposal put forward by CPRE.
14. *Wrampingham Parish Council* - Although one can't help think it is a waste of time if a developer can appeal to the Secretary of State who runs rough-shod over agreed local strategic gaps. Local Parishes could be asked to make a case for a strategic gap where they feel, through local knowledge, that one is required.
15. *Barford Parish Council* - Yes, although one can't help think it is a waste of time if a developer can appeal to the Secretary of State who runs rough-shod over agree local strategic gaps. Local Parishes could be asked to make a case for a strategic gap where they feel, through local knowledge, that one is required.

16. *Poringland Parish Council* - Between Poringland and Bixley; Bixley and Trowse; Poringland and Brooke; Stoke and Upper Stoke.
17. *Framingham Earl Parish Council* - yes, by retaining gaps between settlements keeps the identity of those places separate.
18. *Historic England* - We are pleased to see that the Strategic Gaps are used in order to maintain a distance of separation between settlements in order to retain the identity of settlements and the landscape character of the area. We support this approach and it will be helpful in avoiding the coalescence of settlements. We do not advocate any specific locations for the Strategic Gaps as where they go will depend on where they will be necessary based on growth options and development pressures. We do suggest that Strategic Gaps should be large enough to perform a useful rural space in order to ensure the quality of the land is maintained and they do not become derelict spaces whose sole function is to separate development.
19. *Burston and Shimpling Parish Council* - There should be strategic gaps between Diss and its associated rural villages to ensure the historic distinctiveness and independence of the villages.

Specific comments in support of strategic gaps from members of the public included:

20. There is a real danger of extensive ribbon development - e.g. along the A47 - Costessey, Longwater, FEZ, Easton, Food Hub, Honingham new settlement - miles of unbroken development from the City Centre.
21. Keep the Strategic Gaps as they are so that individual settlements retain their individual boundaries/characters.
22. That individual settlements retain their individual boundaries/characters.

Those that preferred option LA 2 thought that this option was most appropriate as there was a lack of evidence to apply the current policy to the other areas of the plan. There was also a concern that the introduction of further strategic gaps would restrict that availability of land and there were already landscape protection policies.

Specific comments from bodies/organisations **against strategic gaps** were:

1. *Persimmon Homes (Anglia Region)* - Persimmon Homes does not consider that additional Strategic Gaps need to be designated. As the existing Strategic Gaps were designated based on high level landscape assessment, policies should include sufficient flexibility to enable development in the Strategic Gaps where site specific LVIAs demonstrate there would not be a significant adverse impact.
2. *Breckland Council* - Proposals for further Strategic Gaps may have long term implications on the GNDP to meet its housing need. As a consequence there may be pressure on neighbouring *authorities* to accommodate this growth.

3. *Pigeon Investment Management Ltd on behalf of clients* - Pigeon are not aware of any additional strategic gaps that should be designated, but reserve the right to comment further at *later* stages if necessary. Acknowledgement that the current gaps do not completely prohibit development are welcomed and they should be subject to on-going review as to their appropriateness and effectiveness.
4. *Lanpro Services Ltd on behalf of Glavenhill Strategic Land, Silfield Land Limited and MAHB Capital and other clients*- Lanpro does not agree that new Strategic Gaps are required within the Greater Norwich Local Plan area to separate existing settlements. This is because similarly worded countryside policies already acting as development constraints already exist and this type of quasi-Green Belt-type policy is not required.
5. *Barratt David Wilson Homes* - No – there is an absence of evidence to suggest that this is *required*.
6. *Pegasus Planning Group on behalf of Trustees of Arminghall Settlement and another client* - No – there is an absence of evidence to suggest that this is required.
7. *Savills on behalf of a number of clients including Thelveton Farms and Ditchingham Farms* - The use of Strategic Gaps should only be used if supported by robust evidence base. Not simply to *prevent* development. This is consistent with National Planning Practice Guidance, which notes that all settlements can play a role in delivering sustainable development in rural areas, and as such blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided.

ENERGY AND WATER

Question 57

Should option EN1 be included in the GNLP?

Option EN1: Keep a Merton policy approach, but remove sustainable construction content to avoid conflict with recent Government policy changes. Also identify suitable locations for wind and/or solar power.

A total of 54 separate responses were received to this question. 36 respondents supported option EN1 (keeping a Merton policy approach to renewable energy requirements), 17 did not favour the approach in Option EN1 (one respondent being of the opinion that the issue was covered adequately in national policy and guidance) and one considered that it was not possible to express an opinion on the question without clearer evidence that EN1 was the most appropriate approach.

Summaries of specific comments

Yes

Brundall, Hellesdon, Bramerton, Framingham Earl and Tivetshall Parish Councils, Costessey and Reepham Town Councils, Lanpro Services Ltd on behalf of Nigel Hannant, Natural England and eight individual respondents supported Option EN1 without making any additional comments.

Comments from parish and town councils, statutory bodies and other organisations **in support of Option EN1** included:

1. *Diss and District Neighbourhood Plan Steering Group* - Yes. But not in full due to the resistance to on-shore wind power generation. Solar power farms should be constrained to poor-quality agricultural land. Preference is for on-site generation by solar panels on the roof and local battery storage.
2. *Scole Parish Council* - Yes. Modern design could provide more solar power options but no more onshore wind power in this area.
3. *Thorpe St Andrew Town Council* - Yes but a sustainable construction statement should be included to reflect ambition for the best sustainable materials.
4. *Cringleford Parish Council* – Yes, We support the Merton policy and identifying suitable locations for wind/solar power. We dispute the assumption that minimum development size for decentralised energy is 500 dwellings. Limited consideration of grid connections is an issue that transmission and distribution network operators are addressing as they recognise the importance of DRCLE sources in relation to the National Grid. Creating policies that constrain based upon these assumptions would be myopic.
5. *Kimberley and Carleton Forehoe Parish Council* – Yes, in the long term these wind/solar farms are not sustainable due to rubbish generated when dismantled. Focus should be on energy efficient homes.
6. *NHS Norwich CCG* - Yes: energy should be renewable to support human health whilst maintaining supply.

7. *Salhouse Parish Council* - Yes – will need to comply with NPPF.
8. *Broads Authority* (Ms Natalie Beal) [12415]
Yes, you can look at the Broads policy which covers the same topic.
9. *Norfolk Wildlife Trust* - Yes, we support a specific policy relating to the Broads.
10. *Pegasus Planning Group representing Barratt David Wilson Homes* Yes. EN1 should be supported by strong evidence to demonstrate it is appropriate for securing a low carbon future. Caution recommended on complete carbon reduction as it can disregard carbon within the technologies.
11. *Burston and Shimpling Parish Council* – Yes. Solar panels should be compulsory on all roofs with any sort of southern aspect.
12. *Climate Friendly Policy and Practice (CFPP) represented by Dr Andrew Boswell*, provided a detailed critique arguing for an enhanced Option EN1.

Of those respondents **supporting option EN1**, the following additional comments were made:

13. Yes. [The option does not go] far enough though, solar panels should be mandatory which is better than solar farms (which shouldn't be allowed on Grade 3 agricultural land).
14. Yes. A requirement for more than 10% on-site renewable energy is not unreasonable. The Merton Rule should be higher as other authorities have it; or alternatively have a percentage reduction in CO₂ emissions which could be preferable. The local plan should set requirements equivalent to the Code for Sustainable Homes Level 4 and should have standards for commercial buildings.
15. Yes but include requirements equivalent to the Code for Sustainable Homes Level 4.

No

Comments from parish and town councils, statutory bodies and other organisations **who did not support Option EN1** included:

1. *CPRE Norfolk* - **No**, we favour a comprehensive rule where all sustainable standards are connected as an intrinsic commitment for all new developments.
2. *Norwich FarmShare* - No, as it is very unambitious and shows no awareness of the industry/policy context. Renewable energy now forms 30% of the country's total electricity supply and cost of solar has plummeted. Other authorities have stronger policies such as London and financial contributions from developers are required to make an equivalent of 100% by funding renewable energy elsewhere. Developers need certainty from a renewable energy policy and at 30% for example. A higher percentage could support businesses in an industry that has not been helped by government policy. The policy should reference different sorts of heat pumps which are not as widely known as they should be. It seems like the policy has given up on energy efficiency, however the UK is still obliged to abide by EU Energy Performance of Buildings Directive. It is unclear how the government will implement this and the current approach will become untenable as it lacks clarity. GNLP should draft an ambitious policy on energy efficiency as it is ridiculous if buildings are not as efficient as they could be. GNLP should include a policy on commercial buildings, such as requiring developments to meet the BREEAM 'Excellent' level.
3. *The Woodland Trust* - No. We support identifying suitable sites for renewable power generation as long as there are no adverse impacts on ancient woodland. We would like to see the Local Plan promote sustainable building materials such as wood.

4. *Norwich Green Party* - No. The GNLP only contains one comment on the role of renewable energy as part of the development plan. According to the draft plan, it isn't possible to require more than 10% renewable energy on new sites, although this has proven to be achievable in other parts of the UK. Renewable energy has progressed at a considerable rate since the Merton Rule was introduced, yet this aspect hasn't been discussed in the plan. Local authorities are requested by BEIS to report on reductions in carbon emissions. Energy options which have a zero carbon footprint are essential. CO2 emissions and renewable energy are not considered in the Greater Norwich plan. Energy sources must be considered with respect to the Climate Change Act and the Paris Climate Accord so emissions are dramatically reduced and peak emissions reached as soon as possible. The GNLP should be ambitious in the use of energy and to encourage a green economy. The GNLP lacks too much information on renewable energy which is unacceptable.
- The comment that it is not possible to require more than 10% renewable energy on new sites is inaccurate which can be demonstrated by examples such as London (40% CO2 reduction), councils enforcing 19% DER, Eastleigh council have an offset of 15% CO2 emissions and Milton Keynes require a 19% reduction. Major development proposals in London include a detailed energy assessment demonstrating how targets will be met. Results for Energy Monitoring shows a 35% reduction – more than that required in Building Regulations where renewable energy is responsible for 14%. A mixture of renewable energy technologies are used except biomass which is polluting. The council in Eastleigh install solar panels on most council buildings and third party buildings. 30% of energy from council buildings, private homes and commercial buildings will be from renewable sources by 2020. Therefore, more than 10% can be provided, contrary to what is said in the Greater Norwich Local Plan. In Milton Keynes, a 19% carbon improvement is required and in 2014 the council launched their Imagine 2015 strategy with the aim of being zero carbon by 2050. Technologies available for renewable energy and scoping is required to identify the suitable for Greater Norwich. These include solar photovoltaics, solar thermal, building-mounted wind, ground source heat pumps, biomass, micro CHP and large scale CHP. Solar and wind are easily achievable, however the heat pump provides technical challenges. Solar panels are the most feasible and the cost has decreased recently. In an analysis of the solar market, rooftop market is nearing cost-competitiveness with domestic electricity. Price of a solar cell is now 40p per watt compared to £4 per watt in 2005. Technologies will improve through research and development. The Solar Trade Association estimate 670,000 homes have solar power, increasing by 150,000 per year. Wind power is also important. The Norfolk Vanguard project proposes to develop an offshore wind farm which could generate 1.8 GW of energy. There are no details in the GNLP how this energy could be used. Wind energy is also decreasing in cost and costs range between £20,000 and £125,000 depending on if it's microgeneration or small generation. District heating schemes are also a possibility which involves the generation of electricity from a central source. These systems are already in place with income available through either the Domestic or Non-Domestic Renewable Heat Incentive administered by Ofgem. Hydrogen is another option as demonstrated by the Leeds City Gate Project which could be important for the Northern Powerhouse concept. The Government has announced a £25m project for converting a village from gas to hydrogen.

Energy storage should also be considered which allows excess energy to be stored for later use like using batteries for solar cells. This area has challenges for grid scale storage.

The plan involves scoping for suitable locations but should not distract from the fact that the plan does not require scoping for potential locations for renewable only.

To conclude, the GNLP does not consider renewable energy sufficiently enough.

'There is no current evidence that this is achievable' is based on the Merton Rule which was developed when renewable energy was still in its infancy. Other local authorities have higher targets which have been shown to be achievable and Norwich should be moving towards a zero-carbon environment in the future. The use of PV panels must be a requirement with wind power and other sources. The plan should show Norwich to be at the forefront by considering new schemes.

5. *Climate Hope Action In Norfolk* - No, EN1 lacks aspiration and is not fit for purpose with regards to climate change. Merton Rule is out of date and the 10% limit is incorrect. The Planning and Energy Act 2008 hasn't been amended to introduce new constraints on energy efficiency and didn't apply to non-domestic buildings. Wind power is supported by 70% of the population and Norfolk should capitalise on this as one of the windiest counties. The infrastructure built now will outlive the plan so it needs to reflect the need for emissions reductions and recognise the needs of a population living in a warmer climate. As international organisations are successful in bringing together cities, we believe Norwich can find the creativity to seize the moment.
6. *Pigeon Investment Management Ltd representing the promoter of site GNLP0352* - No, Merton Policy unnecessary and building regulations, NPPF and PPG cover climate change that doesn't need to be duplicated in the Local Plan. Policies should address bespoke issues of the local area, however.
7. *John Long Planning representing Otley Properties* - No, Merton policy not necessary as provisions are included in building regulations, NPPF and PPG.

Of those respondents not **supporting option EN1**, the following additional comments were made:

1. No, the point about wind turbines is not the loss of agricultural land but the effect on landscape, amenities and health.
2. No. Having a non-viable policy simply because you have to have a positive policy is hypocritical. Either come up with a viable option or accept you won't meet that criterion imposed from above.
3. No. It is not unreasonable to demand a higher DRLCE contribution than that fixed by the Merton rule a decade ago. As technology improves, a suitable approach would be a rising scale of contribution for the period of this policy.
4. No, it is not unreasonable to require more than 10% on-site renewable energy as the Merton Rule is 15 years old.
5. No, how does the Merton rule align with energy requirements in current building regulations?
6. No. We need to develop a real policy on energy that concentrates on renewables being delivered as part of the planning consent.
7. No. Merton Policy is very old which means Norwich should be aiming for much higher than 10% renewable energy provision. This is necessary given the technological advances and the urgent issue of climate change.

Question 58

Do you support option W1 for water efficiency?

Option W1: Require sufficient infrastructure to meet the needs of additional growth, whilst at the same time promoting water efficiency (using available standards), protection of water quality and areas of environmental importance.

A total of 62 separate responses were received to this question. 50 respondents supported option W1, nine did not and one was undecided. Two respondents considered that the local plan should only include a policy on water efficiency if the issue was not sufficiently covered by national policy and guidance.

Summaries of specific comments

Yes

Brundall, Scole, Hainford, Hellesdon, Bramerton, Cringleford and Burston and Shimpling and Tivetshall Parish Councils, Reepham and Thorpe St Andrew Town Councils, Lanpro Services Ltd on behalf of Nigel Hannant, NHS Norwich CCG and seven individual respondents supported Option W1 without making any additional comments. Salhouse Parish Council noted that only one option was offered.

Comments from parish and town councils, statutory bodies and other organisations **in support of Option W1** included:

1. *Costessey Town Council* – Yes. Also the protection of Drinking Water Sources should be included in protected Zones
2. *Diss and District Neighbourhood Plan Steering Group* - Yes. Particularly important in the area enclosed by Diss and District Neighbourhood Plan as most surface water run-off finds its way to the Waveney.
3. *CPRE Norfolk* - Yes, but the water efficiency standards should be made clear and become part of the “Greater Norwich Rule” as explained in our response to Q52.
4. *Hethersett Parish Council* – Yes. Infrastructure generally needs to grow in line with development, the current too rapid pace of change is not reflected in infrastructure provision
5. *Norwich Green Party* - Yes. We support the strongest policy on water. Greater Norwich is already an area of water stress so should prepare for the future now. GNDP should be lobbying for government powers to set stricter water efficiency requirements.
6. *Kimberley and Carleton Forehoe Parish Council* - Yes – reducing the amount of housing planned to 500 per year would allow for water conservation to keep pace with development. Water efficiency is paramount.
7. *RSPB* - It is essential new development is water efficient and the scale and location can meet future predictions of water availability. Developments must ensure that increased pressure does not affect water dependent species. An up-to-date date study must demonstrate that development targets are achievable and justified. It may be important to consider additional water sources to ensure that Greater Norwich targets don't exacerbate problems elsewhere in the country.

8. *Environment Agency* - A policy considering any loss of UKBAP priority habitat unacceptable is supported. Additional consideration to preserving freshwater habitats is recommended as are buffer zones. Water efficiency is important as Greater Norwich is in an area of water stress but also to reduce bills and emissions. There are a range of Water Environment Regulations that should be complied with and any development within waterbodies should look to achieve these objectives. It is concerning that Aylsham is a key growth area yet has waste water treatment issues, so they should be discussed to ensure that the facilities can support the proposed growth. The Water Resources Management Plan shows a supply and demand deficit so Anglian Water will take appropriate action when the growth option is narrowed down. Harleston could be affected by the need for a new water supply. Importance of groundwater abstraction is not mentioned.
9. *Broads Authority* - Yes – the Broads Authority has a policy that requires [water consumption to be limited to] 110 litres per household per day.
10. *Natural England* - Yes. Water abstractions/water discharges are major issues. Policy needs to be clear how increases in development will address these issues. Water Cycle Study should be undertaken to see how allocations can progress.
11. *Barford and Wrampingham Parish Councils* Yes. Consideration should be given to rain water recycling in new developments.
12. *Poringland Parish Council* Yes, But water availability is a limitation to growth.
13. *Anglian Water Services Ltd* - Yes. We recognise Greater Norwich’s ambition in ensuring demand management through water efficient dwellings. Environment Agency considers that the Greater Norwich authorities are located in an area of serious water stress. The Housing Standards Review Cost Impact report advises the cost of introducing a standard would be £6-9 per dwelling. We support the GNLP water efficient policy and ask that the following be included in the Local Plan:
“Development proposals should demonstrate:

Dwellings meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in building regulations part G2.”
14. *Norfolk Wildlife Trust* - Yes. Water is a major issue in relation to quantity and quality, with respect to designated wildlife sites.
15. *Framingham Earl Parish Council* - Yes. Promoting water efficiency must have a high priority for proposed developments.
16. *Costessey Town Council* - Yes. Also the protection of Drinking Water Sources should be included in protected Zones.

Of those respondents **supporting option W1**, the following additional comments were made:

17. Yes. Here the new build should be subsidising improvements on infrastructure – a tax on new developments to fix issues elsewhere.
18. As climate change is likely to impair water supply matters, it’s essential to build to the highest standard to mitigate future issues.
19. Yes- Particular attention requires to be paid to the role and protection of aquifers.
20. Yes. Why is water so far down the list when Greater Norwich “is suffering from serious water stress”?
21. Yes: Common sense

22. Yes. Use water courses as a natural Green Belt – no development within a mile of a water course. This may overcome the lack of Green Belt around Norwich.
23. Yes. Anglian Water Resource Management Plan predicts a deficit for Norwich and the Broads while rural South Norfolk remains in a surplus. AW proposes options for this matter which should be reflected in the GLNP.
24. Yes - Greater Norwich is an area of water stress, so we need this as a bare minimum, preferably we need to lobby for stricter standards.
25. Yes. I support part of Option W1 but not that developers should use the updated building regulations 2015 to promote water efficiency. New ways should be found to deal with waste before new development takes place.
26. Yes. Permission should be refused if the developer pleads 'viability' when there is an inadequate water supply.

No

Comments from parish and town councils, statutory bodies and other organisations **who did not support Option W1** included:

1. *Colney Parish Council* - No, it is unclear whether the plan contains measures to reduce household/business water use. The Plan makes no requirement of 80 litres per person per day, in a region that is suffering from water scarcity. No new targets requiring more than 10% of energy from renewable sources from new builds. Threat of climate change should be recognised.
2. *Climate Hope Action In Norfolk* - No, given climate change and that we are in a water stressed region, the level proposed is set too high. Water conservation is imperative.

Of those respondents not **supporting option W1**, the following additional comments were made:

3. No. The document states that Greater Norwich is suffering from water stress, yet there is little information on water when infrastructure is discussed. It is only addressed on p. 108. There are weak words such as "continuation of the current approach is suitable and no alternatives have been identified for water" and "Require sufficient infrastructure to meet the needs of additional growth, whilst at the same time promoting water efficiency".
4. This isn't an option but a weak aspiration. It should have specific, proactive strategies.
5. No, it is not clear how enough water can be provided for all the growth.
6. No, I'm concerned that the document identifies water stress as an issue but then proposes to carry on with the current approach. Are planners convinced that growth can be accommodated without risking serious water shortages in decades to come? If not, then this case should be made to the government. Sustainable approaches such as rainwater harvesting should be implemented; otherwise we are being profligate.
7. No - We actually need stricter water efficiency standards than the above favoured policy permits.
8. No. The Poringland and Framingham Earl area has many springs/high water tables so is not suitable for housing. Felling of trees has not helped as they soak up water.

Other comments

Otley Properties represented by John Long Planning and the promoter of site GNLPO353 represented by Pigeon Investment Management Ltd both consider that the Local Plan should only include a water efficiency policy requirement if there are insufficient provisions included within building regulations, NPPF and PPG.

DRAFT

COMMUNITIES

Question 59

Do you support option COM1 for the distribution of affordable housing?

Option COM1: Affordable housing should usually be spread evenly across housing sites and should be tenure-blind in appearance.

A total of 60 responses were received to this question. 49 were in support of Option COM1, 11 were against.

Overview

Most responses from individual residents were generally supportive of policy COM1 for reasons of social inclusion and cohesive communities, whereas disagreement to the policy wording came mainly from the development industry. No objection was made to the appearance of homes being “tenure blind”.

Summaries of specific comments

1. Organisations and groups that supported COM1 were *Climate Hope Action in Norfolk, Diss and District Neighbourhood Plan Steering Group*, and *NHS Norwich Clinical Commissioning Group*. Town and parish councils that gave support were: *Bramerton, Burston and Shimpling, Costessey, Cringleford, Brundall, Great and Little Plumstead, Hellesdon, Reepham, Salhouse, Scole, Tivetshall and Thorpe St Andrew*.
2. One respondent commented that they wouldn't “buy a £500,000 house if there was also going to be a block of studio flats next door” and that they wouldn't want the studio flat with a £500,000 house next door, admitting that this comment could be seen as “snobbish”.
3. *CPRE Norfolk* objected to COM1 on the grounds that it could imply that a group of social affordable homes on their own was undesirable and that this could be “interpreted as a condemnation of all the good work that social housing associations do in creating exception sites”.
4. Several developers, including *Barratt, Pegasus, Otley Properties*, and *Taylor Wimpey* raised a note of caution about the policy wording. Preferring the term “clustering” the affordable housing, as opposed to pepper-potting or spreading evenly the affordable housing over a site. Clustering the affordable housing across a site was argued for on the basis of allowing housing association (Registered Provider) landlords to efficiently manage their housing stock.
5. *Salhouse Parish Council, Taylor Wimpey* and one individual explicitly supported the tenure blind approach. The resident who commented explained how it is acceptable for affordable homes to have smaller gardens and no garages but that there should still be “secure bicycle parking, adequate storage, good insulation, etc. A rationale existed too for preferring “solar panel or solar gain/ passive solar cooling” on the affordable homes on the basis of giving lower income household cheaper utility bills.

Question 60

Which option do you support (in relation to a policy requirement for Health Impact Assessments)?

Option COM 2: Require that developers submit a Health Impact Assessment for sites of 500 dwellings plus

Option COM 3: Do not require that developers prepare and submit a Health Impact Assessment for any scale of development.

A total of 45 individual responses were received to this question. Of these, 35 supported option COM2, 8 supported option COM3 and two favoured neither option.

Overview

Those who responded in support of option COM 2 appear to be mainly local residents, parish councils, and health sector organisations. Councils and organisations that supported COM2 included *NHS Norwich Clinical Commissioning Group, CPRE Norfolk, Climate Hope Action in Norfolk*, and the parish and town councils of *Bramerton, Brundall, Burston and Shimpling, Costessey, Cringleford, Framingham Earl, Hellesdon, Hainford, Hethersett, Kimberly and Carleton Forehoe, Poringland, Scole, Tivetshall* and *Thorpe St Andrew*, as well as the *Diss and District Neighbourhood Plan Steering Group*.

Summaries of specific comments

1. *NHS Norwich Clinical Commissioning Group* suggests requiring Health Impact Assessments on all application for 50 or more homes.
2. The lowest suggested threshold being for HIAs on all new builds, even down to single dwellings.
3. The rationale put for lowering the threshold is to tackle the cumulative of many small-scale developments leading to a population increase that places pressures on healthcare facilities.
4. A related matter put forward was for using Community Infrastructure Levy and Section 106 agreements to pay for healthcare

Those who replied in support of COM 3 were all developers or their agents, although some considered that HIAs could be required in certain circumstances. Examples being: *Barratt David Wilson Homes, Home Builders Federation, Pegasus Planning Group* and *Persimmon Homes*. *Otley Properties* and *Pigeon Investment Management* did not explicitly favour either option and qualified their response as below.

1. Health Impact Assessments should not be required by a blanket policy but instead should be specific to allocation, or dealt with at the planning application validation stage (*Pigeon Investment Management Ltd*).
2. Only require health impact assessments if insufficient provision is made in the NPPF and Planning Practice Guidance (*Otley Properties*).
3. That HIAs should never be required because the Local Plan process should ensure development should be delivered in a way that supports healthier communities. If

policy compliant development fails to help achieve healthier communities it is a failure of the Local Plan to meet the NPPF.

4. Requirements for new healthcare facilities or sports facilities should be identified strategically in the Local Plan or as part of an individual site allocation.
5. Appropriate development policies on design, open space and access can achieve the aims of giving people the best opportunity live healthy, active lifestyles.
6. HIAs are just a burden on the development industry that makes little difference to development and does not aid decision-making.

DRAFT

Question 61

Do you support option NP1? If so, which GNLP policies should be “strategic”?

Option NP1: Identify which policies in the GNLP are classed as “strategic” for Neighbourhood Planning.

A total of 45 individual responses were received to this question. Of these, 38 supported option NP1 and 7 did not.

Overview

Town and Parish councils generally argued for Neighbourhood Plans to carry more ‘weight’ in decision-making, whereas developers argued for more strategic issues be dealt with by the Local Plan or under the National Planning Policy Framework (NPPF). The arguments in support or against option NP1 were wide-ranging, covering what could be written in Neighbourhood Plans and the support that is given by local planning authorities to communities to assist in neighbourhood plan preparation.

Summaries of specific comments

1. *CPRE Norfolk* said they support policy NP1 but urged much more support for neighbourhood plans in the planning process.
2. It was considered that NP1 would aid clarity and that it is the planners’ job to identify strategic policies.
3. A response cautioned against an over-reliance on democracy – arguing “what’s to stop a neighbourhood plan from saying no traveller sites, no affordable housing, no solar panels, etc.? We must be wary of allowing if not actively, economic NIMBYISM.”
4. One respondent appeared to identify “climate change; sustainable transport; settlement hierarchy” as strategic issues; another person suggested “social cohesion; national food supply; nature conservation”; *Poringland Parish Council* said “density and tenure-blindness” are strategic matters; and *Kimberley and Carleton Forehoe Parish Council* identified “social cohesion; national food supply; nature conservation”.
5. One respondent commented that decisions about new development should take into account the amount of recent development in a place and also pay particular attention to the Environment Agency’s concerns over water management.
6. *Historic England* said that a strategic policy for the “conservation and enhancement of the historic environment” is necessary as otherwise the Greater Norwich Local Plan would be unsound.
7. *Barford and Wramplingham Parish Councils* recommend that the local planning authorities work with parish councils to establish where the strategic priorities should lie going forward.
8. *Burston and Shimpling Parish Council* query what the question means. Querying the implications, for example, if Norwich defined what is strategic would that enable the Neighbourhood Plan to be overridden on a matter like the appearance of buildings, thus amounting to a “bullying tactic”; and, undermining the point of Neighbourhood Plans being about what local people want.

9. *Brundall Parish Council* said “keep the status quo”.
10. *Costessey Town Council* said “Neighbourhood Plans are not worth the effort or costs as they are ignored by developers ... developers will try to build outside any settlement boundary especially if there is no 5 year land supply as happened at Cringleford”.
11. *Diss and District Neighbourhood Plan Steering Group* offered the comment that little guidance is offered on what could be deemed strategic by NP1. The concern being that strategic policies may inhibit the inclusion of policies more specifically suited to an individual plan. An example is how housing densities and parking provision in urban areas would be inappropriate in a rural area. Strategic policies could alternatively be defined as those policies that apply across the whole plan area, regardless of place setting or context. Specifically the allocations of sites and destinations of uses should not be a strategic decision but deferred to the neighbourhood plan in consultation with the Local Planning Authority. Furthermore, there is a need to reconcile policy differences where a Neighbourhood Plan area spans more than one Local Planning Authority area.
12. *Framingham Earl Parish Council* supports NP1 but emphasise how much relies on putting in necessary infrastructure which is of strategic importance.
13. *Salhouse Parish Council* said it supports NP1 “provided strategic policies do not overrule NP policies”.
14. *Scole Parish Council* observe that Question 61 is difficult to answer without knowing what the GNLP strategic policies will be. The risk is of the GNLP defining what is strategic and thus to “nullify” every policy that the Parish writes. Defining strategic policies is also arguably unnecessary as district and county council planners have several opportunities to shape and define what a strategic issue is and what should be an issue for the Neighbourhood Plan.
15. *Tivetshall Parish Council* commented that infrastructure [should be provided] ahead of any development and argued for the protection of the identity of existing communities.
16. *Norwich Business Improvement District* are concerned by the size and scale of some neighbourhood definitions and that there should be an understanding to the implications for the city growth, economy and planning. A “lock” is sought that “the proposal needs more than a set percentage of population to succeed and this be mirrored in the engagement with the business community.”
17. *Persimmon Homes* consider that the quantum and location of development are strategic policy matters, referring to the draft National Planning Policy Framework. Their response goes on to say neighbourhood planning should empower people to shape their surroundings, not to prevent or restrict development.
18. *Pigeon Investment Management* said that the NP1 policy should be flexible, recognising that a Neighbourhood Plan can depart from the Local Plan where there is reasonable justification, as well as the spirit of neighbourhood planning being distinct to their area.

CULTURE

Question 62

Which option do you support in relation to a policy on culture?

Option CUL1: Broadly retain the current approach in existing JCS Policy 8 ‘Culture, Leisure and Entertainment’.

Option CUL2: Develop a simplified Culture policy focussing just on the protection, enhancement and provision of facilities.

Option CUL3: Do not have a specific policy on Culture.

A total of 48 responses were received to this question, of these, 17 supported option CUL1, 16 supported CUL2 and 12 supported CUL3.

The majority of respondents considered that it was important to include a policy on Culture within the GNLP. However respondents were evenly split between the options CUL 1 and CUL 2 that could be taken to a policy.

Summaries of specific comments

Those that supported CUL 1 considered that the current approach in existing JCS Policy 8 – Culture, Leisure and Entertainment was successful and so did not need to be changed.

More detailed comments on CUL1 by members of the public were:

1. We all need access to Cultural activities
2. Impact on neighbours should be taken into account when arranging amplified concerts in locations near housing, such as Norwich Football Ground and Earlham Park. These events are very intrusive for anyone living in the area. (For example, football ground concerts, or sometimes just the thudding bass beat) are audible in Earlham, two or more miles away and so are concerts in Earlham Park. An indoor venue, with soundproofing, is a more suitable venue.
3. If it isn't broken....

Specific bodies/organisations made the following comments in support of CUL1:

4. *The Theatres Trust* - In principle the Trust would support the retention of existing policy, although we would recommend the addition of robust assessment criteria to manage proposals for loss or change of use of such facilities. The Trust has model policy wording available, and we would be keen to provide assistance on this topic if required as the plan is developed. We would advise against not having a specific policy on culture, especially in light of culture-related content within the existing and draft revised NPPF.
5. *NHS Norwich CCG* - To ensure that elements that contribute to health and wellbeing, such as leisure facilities and green space, are not overlooked. Access to green space has recently been highlighted in the publication of the UK Government's 'A green future: our 25 year plan to improve the environment'. This was published in January

2018 and includes detail in Chapter 3 on helping people to improve their health and wellbeing by using green spaces. This includes considering the impact this has on mental health and how associated services can improve mental health. It is therefore imperative that access to green space is maintained and managed in a consistent manner.

6. *Salhouse Parish Council* – Current approach appears satisfactory.

Those supporting CUL2, to have a simplified Culture policy focussing just on the protection, enhancement and provision of facilities considered in the main that the approach would promote cultural activities. Some suggested that the approach should identify specific assets or aspirations. Others felt that it should be clearer on funding.

General comments on CUL2 by members of the public were:

1. This is an important area for the development of the Norfolk economy and one where there are major gaps. A special policy might go some way to help Norwich develop as a cultural centre to begin to compare more favourably with other major cities in the East of England.
2. Simplified and unified must be an aspiration
3. Avoids repetition or the need to preserve cultural themes in other elements

Specific bodies/organisations made the following comments in support of CUL2:

4. *Costessey Town Council* – A concert hall/exhibition centre is required for the Norwich area. More community art should be provided/commissioned as part of the development schemes, e.g. developers themselves could commission art as part of a development.
5. *Diss and District Neighbourhood Plan Steering Group* - Options CUL1 and CUL3 require consistent inclusion and referencing within other sections of the GNLP, which renders them more difficult to identify and more open to interpretation. Further, should any of those other topic areas be revised as a result of a review or legislative change then ensuring consistency and completeness of any content relating to Culture becomes administratively challenging and could further diminish the intent of the overall policy.
6. *Scole Parish Council* - Culture gives a quality of life to residents – it should therefore form a fundamental part of any development if possible – green spaces, art, sports facilities, leisure facilities, access to countryside there should be some compulsory contribution by way of CIL or land space to this aspiration. CUL2 should be able to achieve this.
7. *Indigo Planning* - We would support Option CUL2 in order to provide sufficient protection and policy guidance for established and future cultural facilities in the Greater Norwich area. The creation of such a policy would allow the councils to properly monitor the quantum of cultural facilities within the plan area. It would ensure that existing facilities are protected and would set out a clearly defined need for the expansion or creation of new facilities. Facilities such as The Riverside Entertainment Centre, which provides a range of leisure and entertainment facilities, could be enhanced through policy and help deliver mixed uses, new and innovative cultural, leisure and entertainment facilities.

8. *Norwich Business Improvement District (NBID)* – Option CUL2. We want the function of culture to be at the core of this function and be a key economic driver for the city centre supported and embedded in the policy framework.
9. *Framingham Earl Parish Council* – Option CUL2 as this seems to encompass all the necessary cultural *themes*.
10. *Brown and Co.* - We believe that it is important that in the provision of growth there should be an ability for *Greater Norwich* to grow its cultural base. Part of that culture is a recognition of the farming/agri-business base of the area and an appreciation of the countryside. If the growth is to be delivered in a holistic manner, as proposed at Honingham Thorpe, then it's essential that this is taken into account. The intention is that the new settlement should be themed to relate to its farming background and the promotion of agri-business through the FEP. There are other linkages which are referred to in the Delivery and Vision document. This is the only section of the document where there is a reference to 'country parks'. We believe that there should be a reference to the provision of country parks and spatially how they should occur. This should coincide with the green infrastructure provision, including multi-function green space, and ensure that the emerging Plan fully accords with the NPPF. We do not favour Option CUL3. We believe that Option CUL2 has merit and would support a simplified policy that makes specific reference to the provision of country parks.

Those that supported option 3, not to have a specific culture policy felt that the policies covering culture could be incorporated into other aspects of the plan and promoted through other plans and strategies.

General comments on CUL3 by members of the public were:

1. Too vague a concept and impossible to regulate. This is one example where payment in lieu might make sense e.g. instead of paying for community art, payment to a local project/community group to fund their own art.
2. The focus should be on higher priorities
3. Do not forget the link to education and Norfolk's poor educational attainment
4. Option CUL3 seems reasonable at this juncture without details of the plan

Specific bodies/organisations made the following comments regarding CUL3:

5. *CPRE Norfolk* - We support CUL3 so long as our other suggestions for managing and monitoring the Plan are in place.
6. *Pigeon Investment Management Ltd* on behalf of two clients - Pigeon considers that the Local Plan should pursue Option CUL3 and not include a separate policy on Culture, rather provisions should be included within other aspects of the plan. The approach to protecting cultural assets can also be achieved through community action such as the designation of community assets.
7. *John Long Planning* on behalf of *Otley Properties* - Otley Properties Ltd considers that the Local Plan should pursue Option CUL3 and not include a separate policy on Culture, rather provisions should be included within other aspects of the plan.
8. One member of the public stated that all of the suggested policies on Culture are adequate. CUL1 has too many 'potential's 'could's' for policy to be enforced. CUL2 is a policy of retreat and decline, CUL3 is a cop-out and leaves too much to interpretation.

They would like to see a positive policy on culture which demands that there should be developer contribution to cultural activities and facilities in or adjacent to the development being considered.

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THE BROADS

Question 63

Do you support option BR1?

Option BR1: Have a specific policy covering development proposals close to the Broads, requiring the special characteristics and nature of the Broads area to be taken into account.

A total of 59 responses were received to this question. Of these, 52 supported option BR1 and 7 did not.

Respondents indicated significant support for a policy covering development proposals close to the Broads, requiring the special characteristics and nature of the Broads area to be taken into account and protected.

Summaries of specific comments

Further general comments in support of a policy included:

1. A treasured resource which needs special consideration. Any negative impact on the Broads could have far reaching impact on the local economy as well as wildlife/culture.
2. The Broads are an area of national importance in environmental terms and their preservation is crucial to both the environment and the character of Norfolk.
3. No incinerator chimneys built alongside the Broads please!

Specific bodies/organisations gave the following comments in support of a policy to cover development proposals close to the Broads:

4. *Diss and District Neighbourhood Plan* – consideration should be given to extending the core principles to the contributory rivers that have their sources outside of the designated area but are essential to the overall health and quality of the Broads waterways and supply the flows needed to sustain them.
5. *Norwich Green Party* – Given the special and sensitive nature of the Broads landscape, it is extremely important to have a specific policy for the area which takes account of its protected status and various designations. This policy should consider the likely impacts of climate change (notably sea level rises) on the Broads and how these can be mitigated, including likely impacts beyond 2036. Any development close to the Broads should take these likely impacts into account and meet very high standards of flood resilience.
6. *Bramerton Parish Council* – The Broads present a specific set of issues to be addressed. The conservation of a unique habitat with an open landscape character and how this should be maintained. The sustainability of village life, shops, pubs

with seasonal influx of tourists, plus social diversity and how this is affected by the impact of holiday lets and second homes.

7. *Kimberley and Carleton Forehoe Parish Council* – BR1 – this is a necessity.
8. *RSPB* – As owners/managers of over 2,100 hectares of land within the Broads, the RSPB supports option BR1. New development has the potential to affect water quality and could also exacerbate flooding issues so it must be demonstrated that these issues can be addressed. We are also concerned about the recreational impact that a larger population could have and the need for residents to be able to access the nature on their doorstep must be carefully managed to ensure that wildlife is not overly disturbed, especially in protected areas. The provision of green infrastructure must be of the right type and scale to absorb some of the recreational pressure and appropriate management plans and funding into the future must be secured. If sufficient information is not presented to demonstrate that development in this area can be mitigated we will likely object to proposals.
9. *Salhouse Parish Council* – a specific policy is needed.
10. *Broads Authority* – some queries regarding specific sections of the document

6.218 – query ‘The Broads Authority has its own local plan and is the planning authority for most planning applications within its area’. Why most? Do you mean except minerals and waste? Please can you clarify?

6.221 – perhaps reference the special qualities that are set out in the Broads Local Plan

The Historic Environment seems to be covered by the “environment objective” This is a broad objective even in a strategic document of this nature. Generally the richness of the area’s historic environment including Archaeology and geodiversity is not clearly identified either as an observation or of more concern brought out in a specific strategic policy. The Culture section mentions the built environment but then the objective seems to be lost in the policy wording. The Historic environment is an incredibly important, fragile and finite resource much valued by people. It cannot be replaced, it can be augmented. The strategic objectives need to acknowledge and reflect this more positively. The term Historic Environment should be specifically used along with a definition of what this includes.

In terms of the Broads, the term environment can be confusing in terms of the natural and built environment ; clarity is required between the two which are equally important in the Broads area – this should be clarified. Specific reference should be made to the areas potential for special archaeological interest identified by Historic England.

11. *Natural England* - Support for the favoured option to have a specific policy covering development proposals close to the Broads, requiring the special characteristics and nature of the Broads to be taken into account. The policy should include a requirement to avoid and/or mitigate any impacts on the Broads or its setting. If significant landscape impacts remain after any avoidance or mitigation measures have been considered, then a development should be refused as it is rarely possible to compensate for landscape impacts, particularly to nationally important and protected landscapes such as the Broads.
12. *Norfolk Wildlife Trust* - support for the favoured option to have a specific policy relating to the Broads

13. *Framingham Earl Parish Council* - As the Broads are unique region they need to have the specific policies to enable the protection of them, from insensitive and intrusive developments.
14. *Historic England* - Agree that a policy to protect the setting of the Broads is necessary and demonstrates a cross-border approach to planning in the area. We are pleased to see that the policy improvements include greater reference to the special character of the Broads.
15. *Savills on behalf of a number of clients including Thelverton Farms and Ditchingham Farms* – This option is consistent with the NPPF, namely Paragraphs 115 and 116 which recognise the importance of conserving landscape and scenic beauty in designated areas such as the Broads.

Only a small number of respondents did not support option BR1. One objection was from *Climate Hope Action in Norfolk* who commented that the policy did not go far enough, they stated that given the Broads are at particular risk from sea level rise, the lack of proposals in the GNLP to address this threat, with climate mitigation and adaptation strategies under different climate scenarios appears to be a glaring omission which surely needs to be urgently addressed.

Pigeon Investment Management representing two clients consider that a specific policy covering development proposals close to the Broads is not necessary. Such considerations should be included within other relevant policies and allocations and could potentially be included as a criterion against which proposals will be considered.

MONITORING THE PLAN

Question 64

Are there any current indicators that should be excluded or included in the GNLN monitoring framework?

A number of additional or amended indicators were proposed for consideration:

Suggested additional/amended indicators/targets	Proposer	Justification (where provided)
Transport		
16. Capacity for safe cycle storage created	Individual respondents	
17. Bicycle journeys per capita per unit time		
18. Public transport journey-miles per capita per unit time		
19. Transport modal share	<i>Norwich Green Party</i>	Current reliance on census data makes this crucial indicator impossible to monitor properly.
Local infrastructure		
20. Provision of local infrastructure including shops and schools	<i>Tivetshall Parish Council</i> and individual respondents	Require infrastructure completion within a set time of housing development being commenced regardless of build completion rates. (<i>Tivetshall PC</i>)
Environment		
21. Air quality	<i>Climate Hope Action in Norfolk</i> and others	
22. Pre and post forested land cover	Individual respondents	
23. Numerical targets all greenhouse gas emissions, not just carbon.	<i>Norwich Green Party</i> and <i>Climate Hope Action in Norfolk</i>	The new target should be calculated in line with the UK's carbon budgets and should be time bound

24. Higher Renewable energy/carbon reduction targets in new development	<i>Norwich Green Party</i>	Ambitious targets needed
25. Green roofs in new development		
26. Environmental net gain - information on both gains/enhancement of GI and losses/damage	<i>Natural England, Norfolk Wildlife Trust, Norwich Green Party and others</i>	<ul style="list-style-type: none"> • Effective monitoring of GI policies requires provision from both planning applications and infrastructure projects to be measured • Government expects environmental net gain principle to be embedded into development
27. Space for community food growing within new developments	<i>Norwich Green Party</i>	Need policy with a target
Housing		
28. Build rates of developments	<i>Framingham Earl Parish Council</i>	Required if 39,000 target to be met
29. Affordable housing delivery	Individual respondents	
30. Proportion of housing delivery on allocated sites.	<i>Dennis Jeans Properties and Glavenhill Strategic Land represented by Lanpro</i>	The proportion taking place on the allocated sites is not understood. In order to assess how effective the plan is, it is considered that this measure is essential.
31. Provision of self-build plots	<i>Dennis Jeans Properties, Glavenhill Strategic Land and Silfield Ltd. represented by Lanpro.</i>	
Employment		
32. Take up of strategic employment sites	<i>Norwich Green Party</i>	Evidence that many of the sites promoted as strategic employment centres have had low take-up. Monitor so that good decisions can be made about future policies and allocations. If businesses are scattered across too many sites, it affects site viability and makes it harder for new infrastructure to come forward, while also resulting in unnecessary development e.g. Food Enterprise Zone near Easton, (insufficient access, no public transport, no existing

		businesses on site, no masterplan, and possibly not even a full business case). It is not clear that approving a new site was more likely to achieve the aims of the JCS than using or extending existing sites such as the airport park or the NRP. Large employment sites should be monitored for take-up rate and also for their impact on the plan objectives relating to air quality, nature conservation and sustainable transport.
33. Proportion of employment land on non-allocated sites.	<i>MAHB represented by Lanpro</i>	
34. Proportion of employment land lost to residential.		
35. Proportion of employment uses lost through Permitted Development		
Historic Environment		
36. Preparation of a local list	<i>Historic England</i>	
37. Completion of conservation area action plans and management plans		
38. Reduction in the number of assets that are classified as heritage at risk		
Health		
39. Health monitoring indicators focussing on healthy living and wellbeing, health outcomes and prevention and the impact (of growth) on primary care, community care, the acute hospital and mental health care facilities	<i>NHS Norwich CCG and others</i>	

40. Obesity + health inequalities linked to social deprivation	<i>Climate Hope Action in Norfolk</i>	Inequalities are widening
41. Delivery of private and funded care beds	<i>Glavenhill Strategic Land represented by Lanpro</i>	There is a significant need for these
Others		
42. Waste disposal + recycling	<i>Norwich Green Party and others</i>	Indicators/targets should focus on reduction of overall and residual waste, not on increasing recycled waste by weight.

Action: All of the proposed new or amended indicators or targets will be reviewed against the current local plan approach and the need for a new approach will be considered.

General points raised

1. Monitoring should:

- Be meaningful and measurable. ‘Decrease’ (for carbon dioxide emissions) is not meaningful, because the national pattern, echoed in Greater Norwich, is of a decrease nowhere near fast enough to meet our legally binding carbon budgets. (*Norwich Green Party*);
- Prioritise indicators/targets that are most directly affected by planning policy, such as on air quality, affordable housing delivery, nature conservation sites and access to services, over those more tangentially related such as school-leaver qualifications and employment rate. (*Norwich Green Party*);
- Ensure that when targets are not being met, there is a meaningful response, with analysis of how different options could address the problem e.g. transport emissions rising in South Norfolk. The current response is more road building and promoting out-of-town commercial and industrial development that is poorly served by public transport (Norwich Airport area, Food Enterprise Zone etc.). Analysis is likely to show that they will increase carbon emissions, in contravention of JCS policy – yet this is disregarded when decisions are made. (*Norwich Green Party*);
- Be focussed on delivery, consistent with the NPPF (*Pigeon Investment Management Ltd*).
- Include impact assessments on new housing developments and how they do or don’t meet GNLP policies – e.g. sufficient infrastructure and social housing. Gap analysis would make interesting reading – social cohesion, jobs, access to services, transport issues, ‘happiness’ scale, loneliness, where people are coming from to fill these new developments. (Kimberley and Carleton Forehoe Parish Council)

2. Monitoring is a major concern as there are insufficient numbers of Planning officers or Enforcement Officers. More site visits should be made – especially on large developments when it is easy for mistakes to be made and corrections could be difficult to secure (*Costessey Town Council*).

Related points

3. *Brundall Parish Council* stated that it should be possible to call upon additional sites (assessed through the HELAA) if necessary.
4. *Diss and District Neighbourhood Plan Steering Group* referred to the proposed standardised methodology for calculating the Housing Delivery Test.
5. *CPRE Norfolk* argued for establishing a Sustainability Task Force and the creation of a Greater Norwich Rule for all aspects of the Plan and its development proposals. This Task Force should be a sounding board, guide and mentor for the evolving Local Plan. It would consist of a range of active citizens representing the region and place some emphasis on the next generation of council tax payers and voters.

Concerns raised over specific JCS objectives in the Annual Monitoring Reports:

Objective 2: Reduction in the target for “provision of Gypsy and Traveller Pitches leading to these now all becoming green.

Objective 2: Change in the target from “increase” to “no decrease”.

Objective 2: Affordable Housing is changed from a percentage of new allocations to a number per annum. This hides the actual percentage of affordable completions out of the annual total being achieved. 2015/16 figures: Greater Norwich 12.8%; Broadland 17.9%; Norwich 6.8%; South Norfolk 11.76%.

Objective 3: Two of the areas for Office space are now shown as “grey”, previously determined as failing with red coding in 2014/15. This is because no data is provided. The 2015/16 report clarifies that these targets are 2007 to 2026. Monitoring would have far more meaning is expressed as an annual target over this period with an accumulative target for each year. This will show how poor the performance has been.

Objective 3: The performance is now based on whether additional employee numbers show a greater increase than 2,222 in that particular year. The Greater Norwich area for 2014/15 is recorded as red having recorded an increase of 1,400 over 6 years, a shortfall of 11,932. An increase in 2015/16 of 4,900 which is 2,678 above the annual target now miraculously justifies a green coding despite still being 9,254 short of the cumulative target.

Objective 3: the measurement of an annual increase in the percentage rate of economically active population is based on the previous year (Broadland) and ignores the fact that the current percentage is still below the 2008/09 figure.

Objective 3: National retail ranking initially set at maintenance of a top 10 ranking. This is now shown as green by reducing the standard to maintaining a top 20 ranking.

Objective 3: initially required to be increased by 20,000 m² by 2016 and at 2014/15 there had been a net reduction of 5,441m². Again this is shown as green in the 2017 report with the target revised to no decrease and 225m² additional floor area provided in 2015/16.

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Question 65

Which option do you support (in the event of a shortfall in the housing land supply)?

Option HLS1 – Allow the most appropriate HELAA sites to come forward if there were no 5-year housing land supply

Option HLS2 – Do a review of the GNLP to allocate more deliverable sites if there were no 5-year housing land supply

A total of 71 responses were received to this question. Of these, 32 supported option HLS1, 31 supported option HLS2 and nine did not support either option but provided additional comments.

Summaries of specific comments

Of those **supporting Option HLS1**, the following comments were made

1. *EJW Planning* suggest that it is unrealistic to expect a five year review of a local plan, either in whole or in part, when LPA's are struggling with their current *workloads*.
2. *Salhouse Parish Council* support HS1 as the approach would be more flexible. *Carter Jonas* (on behalf of *Taylor Wimpey*), *Armstrong Rigg Planning* (on behalf of *Westmere Homes*) and *Persimmon Homes* suggest variously that a local plan review is the appropriate mechanism to consider OAN but would not be sufficiently proactive to ensure a quick response to addressing a shortfall in housing land supply, due to the time and cost of such a review.
3. *Persimmon Homes*, *John Long Planning* on behalf of *Otley Properties* and an individual respondent suggest that a generous housing delivery buffer would help to maintain a five year housing land supply.
4. *Cringleford Parish Council* and *Savills* comment to the effect that the plan should ensure that there is a 5 year housing land supply.
5. *Kimberley and Carleton Forehoe Parish Council* are of the opinion that brownfield sites should be developed before any further release of greenfield sites.
6. *Kimberley and Carleton Forehoe Parish Council* also suggest that HLS2 might be preferred if the requirement for development was much lower: circa. 500 units.
7. *Persimmon Homes*, *Suffolk County Council* and *Norfolk Wildlife Trust* all stress that the HELAA needs to be fit for purpose. If the approach under HLS1 is taken, issues that will need to be properly consider include: ensuring sites are able to viably deliver the necessary and policy-related infrastructure; excluding designated wildlife sites and taking account of biodiversity constraints on non-designated sites, such as protected species or priority habitats; giving appropriate weight to sites promoted by those with a proven track record for early and rapid delivery in order to quickly address any shortfall.
8. *Framingham Earl Parish Council* suggest that we are always playing catch up with 5yr land supply. Once one site is built another is needed to replace it.

9. *Carter Jonas* on behalf of *Taylor Wimpey, Savills* (on behalf of a number of landowners) and an individual respondent stress that the GNLP should be based on a robust assessment of delivery rates to minimise the risk that a housing delivery shortfall occurs.
10. *Carter Jonas* (in representations on behalf of *Taylor Wimpey*), *Pegasus Planning Group* (in representations on behalf of *Barratt David Wilson Homes* and the *Trustees of Arminghall Settlement*) and an individual respondent point out that government intends to update the NPPG, providing advice on appropriate actions to address a housing shortfall. HLS1 is one action; consideration should also be given to other actions proposed in national guidance.

Of those **supporting Option HLS2**, the following comments were made:

11. *Costessey Town Council* suggest that development sites which are land banked should be considered. All land owned by developers but not built on should be included in 5 year land supply calculation.
12. *Costessey Town Council* also suggest that the distribution of development land should be equal between all authority areas so that one authority is not subsidising another.
13. An individual respondent suggests that the problem with housing will not resolve itself. The reasons why not enough housing is being delivered must be understood before a solution is identified.
14. Three individuals respond to the effect that it is not certain that there would be a shortfall. It is better to take some time over the review: this would be a more measured approach. It may be that in 5 years' time some sites are no longer appropriate for development and others that are more suitable will have come forwards.
15. One individual respondent suggests that the plan should be flexible because we don't know what is going to happen in the future. Fast-changing technology will surely render a vast number of jobs obsolete, the repercussions of Brexit and climate change are factors that may mean that housing land is not needed, whereas food production land is.
16. One individual respondent suggests that the plan could include phasing and a reserve list of sites that could be brought forwards to 2036.
17. *Hethersett Parish Council* state that the current lack of a 5 year housing land supply creates an open door for development.
18. *Great and Little Plumstead Parish Council* raise concerns that all sites in Great and Little Plumstead were identified as suitable in the HELAA despite the fact that they were contrary to the neighbourhood plan.
19. One individual suggests that once sites are placed they are much more likely to be submitted as speculative planning applications even if there is no problem with housing land supply. Whilst this may be refused by the relevant local authority, they would likely be approved on appeal on the basis that being shortlisted was tantamount to being an agreed development site.

20. *Lanpro* (on behalf of a number of landowners and developers) suggest that the level of analysis in a HELAA is minimal and the onus is on the Council to assess suitability rather than the developer/landowner to demonstrate suitability. It will also be difficult to fairly and transparently prioritise sites through a HELAA where information is limited and multiple sites are available. Consequently this approach might not be significantly quicker than a plan review.
21. *Lanpro* (on behalf of a number of landowners and developers) also suggest that a short, focussed review of the local plan to allocate more deliverable sites is the only reasonable, fair and transparent approach. This also places the onus upon the promoter to provide evidence regarding site suitability and delivery. JCS policy 22 was recommended by the Inspector for this purpose, although it has not been implemented. Continuing to allow planning permission on a 5-yr land supply basis until the review is complete is a reasonable approach.
22. *Gladman Developments* suggest that the approach of North West Leicestershire is an example of an effective and implementable review mechanism.
23. *Pigeon Investment Management* and *Gladman Developments* suggest that a policy which seeks to control which sites could come forward in the event of a 5 year land supply deficit is inappropriate and contrary to the NPPF. A criteria based approach consistent with the presumption in favour of sustainable development should be used. This approach will more quickly address any deficit.

Of those **who did not support either option**, the following comments were made:

24. *CPRE Norfolk* consider that new sites allocated in the GNLP should be phased and only developed following the completion of existing approved development sites. Developers manipulate the land supply to obtain approval on new sites. The GNLP should prevent any option for bringing forward additional sites not identified in the plan at any time during the plan period.

GENERAL QUESTION

Question 66

Are there any other issues relating to the GNLP you would like to raise?

Question 66 attracted a broad and diverse response across a range of issues, including comments relating to the consultation process and identified errors or omissions in the document content. A total of 150 individual responses were received, although a significant number of these were in fact comments made in response to Question 1 (*Do you agree with the draft vision and objectives for the plan?*) or Question 2 (*Do you support the broad strategic approach to delivering jobs, homes and infrastructure?*). As the result of an error, the online response form for Question 2 did not include any space for additional comments, meaning that most respondents wishing to comment on Question 2 did so either in question 66 or question 3. Similarly, some responses made to Question 66 concern issues which are wholly addressed by other questions. Where this occurs, the response has been included in the summary for the most relevant question.

Summaries of specific comments

Generic comments have been organised into themes as follows:

- The consultation process
- Policy emphasis/content
- Phasing of development/priority for brownfield sites
- Economic issues
- Social/health issues
- Settlement hierarchy
- Education
- Environmental issues
- Infrastructure issues
- Self-builds
- Houseboats

The consultation process

1. *Wensum Valley Alliance* commented that the consultation is too lengthy and will therefore likely fail to engage with the public. Please maintain the Wensum Valley Alliance on the Consultation List.
2. *Great and Little Plumstead Parish Council* felt the consultation has too many questions, references and appendices and pages are very long. Also, Great and Little Plumstead does not have a petrol station/shop.
3. *Wrampingham Parish Council* – the website doesn't function properly and is hindered by poor broadband speeds. Hard copies should be sent to parish councils. Barford Village does not have a petrol station. Very poor public transport links in the village.
4. *Colney Parish Council* - Consultation should be supported by a forum of representative citizens and not only politicians.

5. *Amec Foster Wheeler Environment and Infrastructure on behalf of National Grid*
National Grid is happy to provide advice concerning our networks. National Grid wishes to be involved in all stages of development that affect our assets so please remember to consult us on sites affecting our infrastructure.

Comments made by individual respondents

6. The Growth Options document is too lengthy and the website has timing out issues. Not suitable for the general populace.
7. "We're not all online you know!"
8. The website has functional issues such as not redirecting the user to relevant sections.
9. There is a lack of clarity in what certain phrases and words actually mean; such as 'sustainability', infrastructure and 'healthy communities'. It advocates housebuilding without addressing climate change. Public transport is poor and will therefore encourage car use thus worsening air pollution and increasing road construction. Consultation on future developments and transport are conducted separately but should be together due to their inherent interconnectedness.
10. Wording needs to be changed for R10 Utilities site that allows scope for other options. *[Note: This comment does not refer to any site proposal in the emerging Greater Norwich Local Plan, but to an existing allocation in the adopted Norwich Site Allocations and Site Specific Policies Local Plan which is not being reconsidered at this stage]*
11. Issues with the tick boxes on website. Email was sent to me after the closing date for comments so not happy. My experience is that consultations are for show rather than out of concern for what people think.
12. When asking for public interaction on all of these plans it would be of great help if the council does their homework on what schools and doctors will be affected and if there is spare capacity for such building projects, at these premises including car parking and road access.
13. I would like to make a general observation about this consultation process, more specifically this platform. I have feedback on other consultations in the past but this is by far and away the worst medium I have had to use for this purpose. The website is haphazard, not user friendly, cumbersome to navigate and submitting answers immediately takes you to the top of the page following the submission of every question. A really horrible website. My experience of Suffolk and Waveney consultations suggests you might want to look there for suitable platforms which are far more user friendly.
14. This is a most secretive document. I discovered its existence by chance. I have seen no publicity or communication displayed within the village. I object to the above as it runs counter to the Brundall Development Plan, in particular policy 3 - "Important Views". It is outside the village envelope and adds further demands on village infrastructure unable to cope with existing developments. (Needless to say these contain unsold properties and fail to meet the needs for sheltered housing, young families, starter homes or social housing in locations where they are needed)
15. The writing on the online document zoomed to 200% is indecipherable.
16. Please keep it simple, this whole document is stunningly complicated and lengthy.

17. The website “is far from user friendly”, the process does not “invite huge participation, there is no conviction about the process being truly democratic, and what “you want to do will happen anyway”.

Policy emphasis/content

1. *Norwich Society* - We believe that the plan and site allocations should be reviewed every 5-7 years in the light of changes to employment, transport, migration and other growth pressures.
2. *Carter Jonas LLP on behalf of Martin Skidmore* - We support the development strategy due to its sustainability. Housing target *should* be revised to reflect government’s methodology for calculating housing needs. Data suggests that housing would increase for Broadland and South Norfolk and decrease for Norwich.
3. *Armstrong Rigg Planning on behalf of Oxygen Real Estate Group* -The broad strategic approach lacks aspiration and is not cohesive with delivery of jobs, homes and infrastructure. It should be ensured *that* the most sustainable/accessible settlements contribute towards jobs and housing growth as much as possible. Development shouldn’t be disproportionately in the Norwich area.
4. *Pigeon Investment Management Ltd on behalf of the promoter of site GNLP0352* – The GNLP should provide a supportive framework for delivering development and infrastructure. Economic and housing growths are essential parts of the strategy. Of equal importance is providing sufficient transport to strategic employment locations. These locations should be a focus for housing growth and they should be linked by infrastructure. Growth shouldn’t be stifled by restrictive policies. Brundall should and can accommodate more sustainable growth.
5. *Norwich Engineering Society* - Due to Norfolk’s predominant land use being agricultural (87%), compared to the national average (56%), it is clear that housing need should be lower. Therefore, the major housing growth seems extravagant. **Lingwood and Burlingham** have had 10-30 houses built in the last decade and further housing growth is resented by a majority of the residents.
6. *Historic England* - The Growth Options strategy under-represents the historic environment. No policy options explicitly refer to wider historic environment or conservation. The plan should recognise that heritage assets includes conservation areas, scheduled monuments, registered parks and gardens as well as listed buildings. There is an overreliance on national policy to secure conservation of the historic environment. Although listed building applications are in accordance with law, not the development plan, non-designated assets won’t be protected by policy. Local plans must align with NPPF in that specific policies should be provided across each of the social, economic and environmental dimensions. The GNLP doesn’t comply with Paragraphs 156 or 157 of the NPPF. Relying on national policy prevents a sufficient local policy approach and questions whether the Plan complies with Paragraph 126 of NPPF.
7. *Costessey Town Council* - Timeframe for adoption of GNLP is too long.
8. *Sirius Planning* - The GNLP should do more to boost the rural economy and should proactively encourage tourism development. There is too much weak language when protecting the environment but positive language for the JT1 Alternative. Alternative JT2 is not considered enough, however. The Western Link is destructive and

- expensive which gets a free pass in one sentence. The direction is for aggressive growth based on the untested City Deal that will prove to be folly.
9. *Thorpe St Andrew Town Council* - The 5 year land supply should not allow CIL money to be invested in areas remote from the developments.
 10. It is disappointing to see **Acle** facing character *erosion* for no other reason than housing growth.
 11. The public are expected to respond to an enormous amount of information in planning language and are ignored if they don't use such language. Due to the volume, it's clear to see it's designed to reduce public engagement. *Localism* is dead – local plans are swept aside by the government desperate to be seen to achieve targets. It is clear planners don't have an impact over Education, Highways, Health, Social Services or Utilities when it came to ensuring a holistic approach was undertaken for development. Building houses to meet targets for fear of losing Government funding doesn't follow the quoted intent of protecting South Norfolk. Housing delivery should meet the needs of communities affected. Developers don't want to provide amenities in order to increase profits, but planning officers are there to provide these services. The impact of global warming on food production means we have to make plans for national food security. This must be taken into consideration when consuming agricultural land.
 12. *Brundall Parish Council* - Based on current situation of dwellings and allocations, **Brundall** can't accommodate any further development up to 2036. We believe this is proportionate with overall GNLP requirement.
 13. The public should have more information about financial aspects of development. Building land sells for much more than *agricultural* land so who is making the profits? Business in confidence excuse used too much by NCC to cover up secrets.
 14. *Lanpro Services Ltd on behalf of Glavenhill Strategic Land* - HELAA capacity assessment has assessed suitability of sites for residential development. Lanpro has commissioned a more detailed assessment on a range of issues. *Individual* merits of this housing site have been wrongly assessed in the HELAA scoring. Rackheath Country Park proposals are aspirational but realistic.
 15. *John Long Planning on behalf of Otley Properties* - [Cross refer in Q66 to comments made in respect of the settlement summaries and HELAA assessments for sites in **Seething, Alington and Poringland** logged against the Site Proposals Document].
 16. There is growth at most towns/larger villages but why not any at our smaller villages/settlements? Current strategy concentrates growth near Norwich but raises the question about dispersing growth. Para 1.17 requires views from everyone but in para 5.5 only asks for views from *corporate* groups. Cycle routes south of the city have been planned for over ten years but access is still poor. Para 2.21 says 'more work needs to be done' for air quality but is an understatement as quality is consistently declining. Parishes are said to have a strong relationship with Norwich but fails to evidence this. Document does not show how we can maintain environmental biodiversity. Water supply is addressed but doesn't mention how water stress can be mitigated. The document fails to discuss diversity unless the individuals are travellers/houseboat dwellers.
 17. *Savills on behalf of Thelveton Farms, Trustees of Major JS Crisp and others* - Our client wants to re-emphasise the importance of housing in rural communities and so national policies such as NPPF, NPPG and Housing White Paper should be referred

to. Housing White Paper highlights the importance of making land available in the right places. Local planning authorities should *identify* opportunities for villages to thrive (White Paper). NPPG notes that all settlements can play a role in delivering sustainable development in rural areas.

Phasing of development/priority for brownfield sites

1. *CPRE Norfolk* comment that sites allocated in the JCS (sic)⁶ should be developed before any new sites are added to the GNLP. This protects countryside and but allocated land in JCS is sufficient for development over the next 24 years. Very little evidence shows increasing the amount of land available for development increases the rate of building. This causes developers to 'cherry-pick' profitable Greenfield sites. Also, phasing should be an option which would prevent unnecessary development and is supported by 64 parish councils.
2. *Hempnall Parish Council* - HPC supports retaining the Norwich Policy Area with current boundaries. HPC wishes to remain in the Rural Policy Area and asks that current policies protect rural parts of Broadland and South Norfolk from excessive development. HPC asks that the Settlement Hierarchy is retained in GNLP to 2036 and that Hempnall remains a Service Village. HPC opposes development outside the development boundary. HPC supports the CPRE pledge and asks that existing sites are built out first – which was voted unanimously for.
3. *Norwich Green Party* - New sites should be phased by being put on a reserve list and only built when JCS sites have been used. It will take almost 24 years before existing allocated land is used up.
4. *Drayton Parish Council* - Developers who have a history of non-delivery of approved sites should not be allowed to promote further sites until all approved sites have been delivered. More consideration must be given to prevent housing in critical drainage areas with risk of flooding.
5. *Environment Agency* - The plan hasn't indicated how brownfield land will be used to ensure protection of human health, property, ecology and environment. The Plan should meet requirements of Model Procedures for the Management of Land Contamination CLR11 and a Preliminary Risk Assessment should always be carried out. Recycling of waste does not have a strong focus in the plan. Although recycling has seen a good uptake, it is important that waste recycling is considered more.

Comments made by individual respondents

6. Tighter time limits should be imposed on developers to start building rather than land banking. More weight should be given to paragraph 14, footnote 9 of NPPF.
7. Current JCS sites should be used up before any new building e.g. St James site in Barack Street.
8. Current JCS sites should be used first as it protects countryside and current allocations will cater for next 24 years.

⁶ It should be noted that the JCS does not itself allocate sites for development (as the GNLP will), but sets an overall housing and employment land allocation target and specifies dwelling numbers and the indicative scale of growth planned for in named locations. Individual sites which contribute to this target are allocated in local plans/development plan documents prepared and adopted separately by the three district planning authorities within Greater Norwich.

9. Only found out about consultation through village notice board. Too much information and some questions unimaginative/unsupportable. Makes sense to develop in urban environments as that's where people like to live yet the central vision is to build on greenfield sites and countryside etc. There is much wildlife around Barford/Barnham Broom etc. with fields/copses/woodland. Once they're gone, they're gone.
10. More emphasis should be placed on brownfield sites. Funds should be available to prepare these sites if necessary so they're more acceptable to developers. Why is the Norwich area not progressing with brownfield sites? E.g. Sovereign House, Magdalen Street, Norwich. Countryside should be kept for leisure, relaxation, and play areas. New building sites would require more infrastructure – why create more hazards? Education is not as good in Norwich as the Greater Norwich area.
11. No green field land should be built on until all brownfield sites have been built on. These plans would cause a reduction in the quality of living for most residents with the main beneficiaries being the developers.

Economic Issues

1. *Emery Planning Partnership on behalf of Honeyview Investments Ltd* - The principal concern relates to the economy. Greater Norwich is one of the fastest growing areas in the UK and the ambition is to grow a world class economy. Growth areas include life sciences/bio technology and suitable sites should be identified in the region. The GVA Employment, Town Centre and Retail Study (2017) identifies sites that will form the basis of the economy.
2. *Carter Jonas on behalf of the promoter of site GNLP2158 y* - We request that the alignment between the jobs target and housing target is considered further. Working age population should be sufficient to meet the increase in jobs and those workers should have access to sufficient housing. This avoids significant increase of in-commuting.

Social/health issues

1. *NHS Property Services* - Ensuring that mitigation measures are identified at an early stage is essential in preventing a future under-provision of health services in the area. NHSPS would welcome further discussion with the Council about housing and population growth and mechanisms for healthcare infrastructure delivery. NHSPS is analysing housing growth across Greater Norwich to understand impact of population increase on healthcare facilities. Ensuring necessary mitigation measures are identified early on is essential to prevent an under provision of services. Where extended primary facilities are required, CIL funding would be required to help fund the infrastructure.
2. *NHS Norwich CCG* - The GNLP will have an impact on health and social care and therefore needs to be engaged with the STP and health and care partners. GNLP should ensure up to date planning information is provided to these organisations to ensure that housing and population growth is appropriately planned for.
3. *Starston Parish Council* - There is community support for slow and careful development, and infill development at around 1 house per year in the parish. Affordable homes are necessary for the health of the village. Some households want

to build on their land which has community support and we would like the authorities to take these views into consideration.

4. *Norwich FarmShare* - We would like to see the inclusion of a policy on community food growing which has many benefits for health, community cohesion, climate change and the environment.
5. *Norwich Green Party* - We support Norwich FarmShare's call for a policy supporting community food growing.
6. *Norfolk County Council (Childcare Development Manager)* - There is an omission of childcare in this plan. Every child is entitled to 15 hours of free childcare which is an important economic policy to increase the workforce as the parents can work. Norfolk County Council has a statutory duty to provide sufficient childcare for working parents. There are planning concerns related to childcare such as getting applications approved, lack of premises, highway concerns and access to public transport routes, to name a few.
7. *Diss and District Neighbourhood Plan Steering Group* - A separate submission has been made.

Comments made by individual respondents

8. Too little attention on Norwich as a River City. Design of houses is not considered enough with regard to mental/physical health.
9. There should be a dedicated table tennis facility, which has few boundaries, is open to a wide range of people and very good for physical and mental health. There are 3 level 3 coaches which is rare in any part of Norfolk.
10. All councils have a social and wellbeing responsibility towards [their] residents. All developments must respect beauty, landscape diversity, natural resource wealth and the ecological, agricultural and recreational value of the countryside. It must be sensitively integrated into the surroundings, however it appears as though these regulations aren't followed.

Settlement hierarchy

1. *Scole Parish Council* - The plan incorrectly shows Scole as having a petrol station, which closed in the 1990's.
2. *Hainford Parish Council* - Hainford should not become a Service Village because it lacks adequate infrastructure and services. Anglian Water has acknowledged there is a serious problem with overflowing foul sewers in this catchment due to the saturated ground and high water table.
3. Hainford and Hevingham should not be Service Villages which have few footpaths and poor infrastructure. Significant development is contrary to the parish plan or wishes of residents.
4. I am opposed to Hainford becoming a Service Village as it does not meet essential criteria for the specification due to the very limited amount of services. The General Response Form put people off as without a hard copy of the Plan they were not able to state paragraph and page numbers.

Education

1. *Department for Education* - NPPF advised that LPAs should ensure there is a sufficient choice of school places to meet the needs of communities and to widen choice in education. The ESFA [Education and Skills Funding Agency] supports the

GNLP in safeguarding land for provision of new schools. GNLP should have regard to Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education. The ESFA encourages close working with local authorities during all stages of planning policy development to help guide new school infrastructure. Education is included within CIL, but an exception applies to land which is required under a planning obligation to provide to provide an onsite school. However, the risk is that they may not be fully funded by CIL. IDP and viability assessment should consider if planned development can meet the costs of directly related infrastructure.

Infrastructure

1. *Hethersett Parish Council* There should be no development south of the B1172. A traffic and transportation plan is lacking yet all agencies need to contribute to a masterplan for transport. It's essential that local facilities develop in line with additional development.
2. *Norwich Green Party* We are in support of new housing where services can be reached by foot/public transport and oppose new housing across rural areas. This petition received 539 signatures.
3. *Bramerton Parish Council* The impact on traffic through Bramerton from allocations at Rockland and Surlingham would be significant.
4. *Harvey and Co* Growth has not been matched by adequate improvements to infrastructure/services. Large single site allocations are needed to make infrastructure improvements worthwhile. A new garden village would give many opportunities such as comprehensive growth, creation of a sense of place and a range of investments.
There was no mention of improving transport or medical infrastructure and traffic congestion is unacceptable. Introduction of NDR has not improved the situation and completion of the orbital road is paramount to save the City. Medical infrastructure is strained and although provision of facilities is not the responsibility of the Council, planning for thousands of extra houses would be irresponsible without adequate correspondence with healthcare providers. Lastly, mixing social housing with privately owned dwellings will cause all kinds of problems so should be discontinued in favour of traditional planning practice.

Environmental Issues

1. *Natural England* - Developer contributions should include provision of appropriate natural capital infrastructure to achieve *biodiversity* net gain. Site allocation policies should have specific mitigation and enhancement measures. Natural England will object to any allocation likely to have an adverse effect on an SSSI. Proposals that have a negative effect on GI network should not be approved. Some site proposals may be able to include a County Wildlife Site as informal GI space but will depend on various factors.
2. *Climate Hope Action In Norfolk* There are many risks as a result of climate change but also opportunities, including for the local economy, clean energy industry jobs and public health benefits. If Greater Norwich fails to take advantage of these, it risks significant harm within the lifetime of this plan. It is imperative the GNLP addresses the range of challenges posed by climate change. Climate change and health are well linked and mitigation/adaptation strategies offer substantial health benefits.

Childhood obesity is a state of emergency and the environment is recognised as playing a key role. Well-being and climate change have been described as the two greatest challenges globally to public health. As there is a narrow window for averting catastrophic climate change, global carbon emissions must fall from 2020 with net zero emissions achieved in a few decades. If Greater Norwich fail to meet these challenges, we risk substantial harm to local area and communities including public health. We urge GNDP to demonstrate great commitment to climate mitigation so Greater Norwich can benefit from the many social, health and economic opportunities arising from low carbon development.

3. *Costessey Town Council* - Timeframe for adoption of GNLP is too long. Density of new developments in fringe parishes has caused concern about compromising the landscape character. Designated *valley* of the River Tud should include all land against boundary of East Hills Woods. SuDS are not appropriate on many sites in Costessey due to the geology. Flood Risk Assessments should be required at the start of the planning process and proposed SuDS should be checked that they are proper SuDS.
4. *RSPB* - 56% of species assessed has declined since 1970 and a new measure suggests that the UK has lost more nature than the global average. There is a 47% long term and a 49% short term decline in urban species. RSPB is committed to improving people's connection to nature, which correlates with better engagement with pro-nature behaviours. It is imperative there are wildlife-rich spaces in and around developments. These spaces can provide a core role in improving resilience to flooding, water pollution, enhancing sustainable transport and reducing the urban heat island effect. We are developing Nature-friendly housing principles which are high quality places that work for people and wildlife. An example is where RSPB has collaborated with Barratt Developments in Aylesbury which was the first national agreement in the UK. These have many benefits for a variety of wildlife, including for hedgehogs, flowers, trees and many birds.
5. *Forestry Commission* - The Broads is likely to benefit from a degree of long term protection irrespective of the GNLP as would historic parks/gardens, ancient woodlands, listed building settings and heathlands. As the Government has targets of increasing woodland, we welcome any opportunity from proposed development that includes tree planting. Sources are provided for advice on biodiversity conservation. Forestry Commission has provided advice on conserving ancient woodland which includes the Ancient Woodlands Inventory (how to find out if a woodland is ancient). The Forestry Commission encourages local authorities to consider the role of trees in planning objectives.
6. *The Woodland Trust* - The unique habitats ancient woodland sites provide for many of the UK's flora and fauna cannot be re-created and so cannot afford to be lost. We are concerned about a number of site allocations as they could lead to the loss of ancient woodland. The NPPF states that planning permission should be refused for development resulting in the loss/deterioration of irreplaceable habitats. The Housing White Paper also shows the government's intent to improve planning protections for ancient woodland. Approximately one quarter of UK BAP species are associated with woodland habitats. Development in ancient woodland can lead to long term changes in species composition. Woodland outside the development can also be affected by outside influences from the nearby change of land use which can

affect the woodlands conditions and extend well to the wood. Development should therefore be as far away from ancient woodland as possible. Buffers should be constructed on a case by case basis. Therefore, we object to the site allocations (attached) as they are likely to cause some damage to ancient woodland.

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Comments made by individual respondents

7. Regarding proposal R10 in Cremorne Lane, I object to the inclusion of district heating and power *generation* elements as there are much more environmentally friendly that are without the noise and pollution risks. *[Note: This comment does not refer to any site proposal in the emerging Greater Norwich Local Plan, but to an existing allocation in the adopted Norwich Site Allocations and Site Specific Policies Local Plan, which is not being reconsidered as part of this consultation]*
8. It is extraordinary that such care was given to the environment when building the NDR, yet now the green space cushioning boundaries is potentially going to be filled in with urban sprawl. This will lead to air and noise pollution and lack of recreational spaces and healthy environmental living conditions.
9. Too little consideration for nature conservation and new development will have a negative impact on designated sites and there should be a green belt for wildlife. Previously developed sites should be priorities instead of green areas. Majority of existing sites should be built prior to considering new sites. Can local healthcare providers accommodate the additional patients?

Self-builds

1. *Barton Willmore on behalf of Landform Estates Ltd* - All councils must make land available for self-build homes. Government wants number of self-builds to double. Half of UK buyers would love to build their own but are put off by difficulties. Lack of availability of consented land is biggest constraint. Landform has a proven track record of delivering self-build plots.

Comment made by an individual respondent

2. Objectives for housing should be widened to encourage a wider range of house types. I favour growth option 5 as it can maintain vitality of smaller settlements but do not support a Norwich green belt as I don't think it'll be of any benefit. If water/sewerage capacity is limited, it should be considered if additional growth could unlock more capacity. Digital connectivity is very important and the plan should encourage discussions with providers prior to development. It is disappointing to see that the document doesn't contain proposals for self builds especially because South Norfolk sought to be a Vanguard Council for self-build. Given that there is a statutory duty on local authorities to promote the self-build process, it follows that a Local Plan that doesn't address them will risk being found unsound at an inquiry. These are not matters of policy but matters of law.

Houseboats

Comment made by an individual respondent

1. Well-presented document. More housing could lead to pressure on Whitlingham Country Park. 4.24 - double check question 43 reference. 4.114 and 4.155 – does option for travelling between villages influence the suitability of this approach? Broads Authority uses the term 'residential moorings' as it is the mooring space that is provided rather than the boat itself.