

Greater Norwich Development Partnership Board

5 September 2016

Item No 2

Greater Norwich Local Plan – Introductory Report

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Summary

The following report provides an introduction to the Greater Norwich Local Plan (GNLP) process for the first meeting of the Greater Norwich Development Partnership (GNDP) Board. The report summarises the work which has already been undertaken in terms of:

- the initial work to start the production of the GNLP, including identifying the housing requirement and the call for sites to accommodate growth;
- establishing the team to deliver the GNLP;
- existing and additional evidence needed to inform the content of the GNLP; and
- the preparation of the GNLP Issues Paper to facilitate stakeholder workshops in mid-September 2016.

Views are sought from the GNDP on any key directions and themes the members would wish to see considered at this early stage of preparing the plan.

Recommendation(s)

It is recommended that members of the GNDP:

- (i) Note initial progress made on the GNLP;
- (ii) Give early consideration to the key issues and themes for the GNLP;
- (iii) Agree the next steps for plan preparation.

1 Introduction

- 1.1 Broadland, Norwich and South Norfolk councils have an existing Joint Core Strategy (JCS) which plans to 2026, and supporting Local Plan documents which plan to at least 2026 and beyond in the case of the Broadland Growth Triangle Area Action Plan.

- 1.2 Working with Norfolk County Council, the three local planning authorities (LPAs) are now reviewing and rolling forward these documents in the form of a joint Greater Norwich Local Plan (GNLP) looking to 2036.
- 1.3 The GNLP will set out both the strategic planning policies and the site allocations and will replace the existing Joint Core Strategy (JCS), as well as the site specific elements of the respective Local Plans¹. The starting point for the review assumes that all sites identified for development in an existing local or neighbourhood plan remain appropriate.
- 1.4 This report sets out the work undertaken to date and the work which will lead to the identification of a favoured option and reasonable alternatives for the GNLP in 2017. It also seeks an initial view from the Greater Norwich Development Partnership (GNDP) Board on key directions and themes that members would wish to see considered at this early stage of preparing the plan.

2 Background

- 2.1 As part of the process of preparing the current local plans for Broadland and South Norfolk the respective examination Inspectors highlighted the need for an early review of the plans in order to extend the time horizon to the 15 years minimum recommended by the National Planning Policy Framework (NPPF). The replacement local plans therefore need to be in place by late 2020, five years after the adoption of the South Norfolk Site Specific Allocations and Policies Document and the Wymondham Area Action Plan.
- 2.2 To demonstrate the commitment to an early review of their local plans, Broadland and South Norfolk councils informed their Inspectors that the Greater Norwich authorities, working with North Norfolk and Breckland councils, had commissioned the Central Norfolk Strategic Housing Market Assessment (SHMA). The SHMA updates information on the overall number of new homes required along with the mix of homes and affordable housing requirements within that overall need. The SHMA projects the requirements forward to 2036, to mirror the end date of the GNLP, see 4.2 below for more details.

3 Joint Working

- 3.1 The authorities have a long track record of co-operation. The JCS was prepared by the GNDP and was originally adopted in 2011, with amendments adopted in January 2014.
- 3.2 Subsequently the focus has been on the implementation and delivery of the JCS policies and allocated local plan sites. This will continue to be the focus of the Greater Norwich Growth Board (GNGB).
- 3.3 On 24 September 2015, the GNGB resolved to recommend to the respective authorities that a GNLP should be produced, consisting of strategic policies (similar to those in the JCS) and site allocations. Development Management Policies would continue to be produced and reviewed separately by the three LPAs. The September report concluded that it would be *'more difficult and risky for each LPA to seek to address the wider strategic matters in a piecemeal, district-by-district basis. In addition, moving away from a joint plan*

¹ Broadland Site Allocations DPD; Broadland Growth Triangle Area Action Plan; Norwich Site Allocations and Site Specific Policies Local Plan; South Norfolk Site Specific Allocations and Policies Document; Long Stratton Area Action Plan & Wymondham Area Action Plan.

would convey a negative message on our commitment to work together to deliver economic growth’.

- 3.4 A key driver for the inclusion of sites within the GNLP is the emphasis on deliverability; the approach in the JCS meant that there was a considerable delay between setting the growth requirements and the allocation of sites to deliver that growth. Amongst other implications, this has not helped with securing a five year housing supply in the Norwich Policy Area (NPA).
- 3.5 The recommendation to progress with a GNLP was reported to the respective authorities and their Local Development Schemes (LDSs) were updated accordingly:

Authority	September 2015 GNGB recommendation reported	Updated LDS
Broadland	Cabinet, 19 January 2016	
Norwich	Sustainable Development Panel, 24 February 2016	Cabinet, 9 March 2016
South Norfolk	Cabinet, 2 November 2015	Cabinet, 15 February 2016

The GNDP Board

- 3.6 Because the production of a new local plan is not within the terms of reference of the GNGB, governance for plan production will fall under a separate body. It was also considered that a broader membership would be beneficial for the plan making role of the group overseeing the GNLP. Following the GNGB meeting of 24 March 2016 the Greater Norwich authorities have agreed that the GNDP Board will be re-established to oversee at least the initial stages in the production of the GNLP. This was agreed by the respective authorities during May and June and the relevant councillors were nominated to make up the Board. The GNDP Board is not a decision making body and this responsibility still sits with the respective councils. Therefore, member engagement will be both through the GNDP Board and through the various committees of the constituent authorities.

The GNLP team

- 3.7 In order to progress the GNLP, a team has been set up and Mike Burrell (Norwich City Council) has been appointed as Greater Norwich Planning Policy Manager. The team comprises one further full time equivalent member of planning staff from Norwich, two each from Broadland and South Norfolk and one from Norfolk County Council; these full time equivalent hours are distributed across more members of staff to maximise the benefits of the existing expertise within the authorities' teams. Additional staff will provide dedicated support for the work of the GNLP team.
- 3.8 The work of the GNLP team is overseen by the Infrastructure Delivery Board (IDB), made up of senior level representatives from the partner authorities and New Anglia LEP. As well as the work streams, the IDB will oversee the GNLP budget and provide coordination with the GNGB and the Greater Norwich Projects Team's work on infrastructure and delivery.

4 Work to date

- 4.1 Previous reports to the respective authorities have noted that work has already been progressing on a number of elements of the GNLP; the following is an

updated summary.

Strategic Housing Market Assessment (SHMA)

- 4.2 As noted above the Greater Norwich authorities initiated the process of plan review through the commissioning of a SHMA which sets out the projected housing requirements for Central Norfolk to 2036, known as the objectively assessed need (OAN) for housing. The SHMA takes into account the growth aspirations of the Greater Norwich City Deal and equates to approximately a further 12,000 new homes for Greater Norwich between 2012 and 2036, over and above those already built, permitted or allocated, as follows:

SHMA Objectively Assessed Need (April 2012 to March 2036)	52,170
Already built (April 2012 to March 2015)	4,160
Committed sites (at 1 April 2015)	23,375
Emerging sites (at 1 April 2015)	12,782
Remainder to be allocated	11,853

- 4.3 The above figures assume all of the committed sites (permissions and allocations) and emerging allocations will be delivered by 2036, but does not make any assumption about future windfall. This position will be updated as the plan progresses to reflect further completions and additional commitments made since 1 April 2015, along with any changes in the underlying populations/ household projections which underpin the OAN or other relevant changes to evidence.
- 4.4 The NPPF requires local plans to “meet objectively assessed need with sufficient flexibility to adapt to rapid change”. To enable the delivery of OAN, and to help maintain a 5 year land supply, there will be a need to allocate more housing than the minimum OAN figure. This has been reflected by Inspectors’ decisions at examinations into local plans, including for the recent Growth Triangle Area Action Plan.
- 4.5 The exact level of allocation that is appropriate will need to be established through the production of the GNLP taking into account any change in Government policy and relevant inspector’s decisions. An example of how additional allocations above OAN might be reflected in Local Plans is highlighted by the recent Local Plans Expert Group (LPEG) recommendation to Government. This proposes that an additional 20% buffer of ‘reserve’ sites should be identified for all unbuilt homes in local plans. If applied to the GNLP this would mean 52,170 OAN – 4,160 already built = 48,010 remainder of the OAN, 20% of which would equate to reserve sites for a further 9,600 dwellings. Whilst currently far from certain, a 20% uplift is considered likely to represent a “high end” scenario.
- 4.6 It should also be recognised that the OAN in the recently published Central Norfolk SHMA already includes an element of uplift in Greater Norwich related to commitments to jobs growth. The OAN itself may also change as new Government projections for population and household increase are released; this could result in increases or decreases in the final GNLP requirements.
- 4.7 The SHMA also sets out the proportion of affordable housing required to meet the needs of the area, although this is likely to be reviewed to take into account

the Government's Starter Homes requirements.

Call for Sites

- 4.8 Because the GNLP will include site allocations as well as strategic policies a formal 'call for sites' was undertaken between 16 May and 8 July 2016. The call invited the submission of sites for all uses, including housing, employment, retail and town centre uses, recreation and 'Local Green Spaces', the latter of which provides special protection for green areas of particular importance to local communities.
- 4.9 The call for sites was sent to planning and land agents, known sites owners (including those who submitted their sites for inclusion in previous plans), local businesses who may have aspirations to expand and town and parish councils. The call also received extensive publicity in the Eastern Daily Press.
- 4.10 The call invited submission of both green and brownfield sites, from small urban plots to potential large-scale greenfield developments and the authorities have sought to glean as much information as possible from those submitting the site(s) to support the subsequent assessments.
- 4.11 These sites are currently being logged and plotted and further details will follow in the November GNLP report.

Site Assessment

- 4.12 Each of the submitted sites is being assessed, alongside other sites such as unimplemented allocations from the existing local plans and unimplemented (or partially implemented) extant planning permissions. This process is not intended in any way to delay the progress of allocated sites in adopted plans to achieving planning permission given that the GNLP will not be adopted until late 2020.
- 4.13 The sites are being assessed through a Housing and Economic Land Availability Assessment (HELAA). A HELAA methodology, based on the Government's requirements, has been jointly prepared by the Norfolk LPAs as part of the Norfolk Strategic Framework (NSF) process. The assessment of sites will also form part of the Sustainability Appraisal (SA) of the plan.

Sustainability Appraisal & Habitats Regulation Assessment

- 4.14 A key element of the production of any plan is the assessment of the potential impacts of the emerging policies and allocations. Sustainability Appraisal (SA), which is undertaken alongside the development of the plan itself, will examine the environmental, social and economic implications of the proposed policies and allocations and help identify how the proposals can be refined and impacts mitigated. Consultation on the first stage of SA, a scoping report, took place between 20 June and 15 August 2016. Officers are currently finalising the scoping report. The SA will be undertaken by the GNLP together with Lepus Consulting.
- 4.15 In addition the Landscape Partnership has been appointed to undertake the Habitats Regulation Assessment (HRA), which will assess the potential impact of different possible growth locations on internationally protected habitats; the first stage of this is a critical evidence review to identify any outstanding information which is needed to complete the assessment.

Reviewing the JCS area wide policies

- 4.16 Since the GNLP will be a review and roll forward of the JCS, the GNLP team is undertaking an initial review of JCS area wide policies (policies 1 to 8), for example to identify any areas where they have been superseded by national policy changes.

Critical friends

- 4.17 Legal and planning 'critical friends' are being engaged to provide ongoing external challenge and support to ensure the work on the GNLP is legally compliant and produces a sound plan when set against the context of the existing planning legislation and proposed changes.

Timetable

- 4.18 A broad timeline for the production of the GNLP has already been shared with the GNGB; an updated version of this timeline highlighting the key stages at which member involvement will be required is attached at appendix 1.
- 4.19 In line with the current regulatory requirements and in order to produce the GNLP within the required timeframe the stages in document production have been streamlined. Full public involvement will take place at the Regulation 18 consultation stage, which will set out a favoured option and reasonable alternatives, and Regulation 19, which will be the proposed submission plan.
- 4.20 The recent LPEG report to Government has recommended that local planning authorities be able to make changes to the proposed submission version of the plan following Regulation 19. This proposed change is supported by the Greater Norwich authorities as an aid to speeding up the plan process.

5 The Issues Paper and Stakeholder Workshops

- 5.1 The first substantive stage in the development of the plan is a series of stakeholder workshops. Invitations were sent in July for workshops during the week commencing 12 September. The purpose is to gain early stakeholder input on the key issues the plan should address through discussion of the Issues Paper questions. The Issues Paper is attached in appendix 2.
- 5.2 Separate workshops will cover the Issues Paper's themes of: Housing, Transport, the Environment, and the Economy, with the strategic distribution of growth being a key consideration for each of these. In addition, area based workshops will give the opportunity for other organisations, such as town and parish councils, to input at this early stage. The outputs of the workshops will be reported to members in November.

Key Issues for the GNLP Board

- 5.3 While it would not be appropriate to pre-empt discussions and analysis by answering the following questions, it would be useful for members to advise on any key factors that they consider will influence consideration of:
- Whether the Greater Norwich area should be divided into two or more policy areas;
 - Potential patterns of growth;
 - The potential for a new settlement or settlements;
 - Particular locations of growth and restraint;

- Delivering major new infrastructure;
- The desirability of a Green Belt for Norwich;
- Rolling forward area wide policies (JCS policies 1 to 8).

This is by no means an exhaustive list and GNDP members may wish to raise other key considerations on the direction of the plan at this stage.

6 Evidence

6.1 Good quality evidence is key to developing the plan. It is also important that evidence is proportionate and is collected cost effectively. In some cases evidence will be required to assist in the identification of the most appropriate locations for additional growth, in others it will be required at a later stage of plan making to, for example, provide clarification on the infrastructure required to serve the growth options promoted. Consequently evidence gathering will involve:

- Specific studies on core issues such as the local economy and development viability. In these cases it will be necessary to commission dedicated new evidence.
- Where possible, existing JCS evidence will be updated in consultation with key stakeholders. Ongoing engagement is planned with service and infrastructure providers such as Anglian Water, as well as statutory consultees and regulatory bodies such as the Environment Agency, Natural England and Historic England, to fully understand the growth constraints and opportunities. This engagement will cover a wide range of issues including education, health, social infrastructure (sports facilities, community buildings etc.) and utilities.

Transport for Norwich (TfN)

6.2 The current Norwich Area Transportation Strategy (NATS) was adopted in 2004. A small number of minor policy changes were subsequently agreed in April 2010 as part of the development of the JCS. Given the date of the NATS, many of its measures have now been implemented and others need to be reviewed. To assist the development of the GNLP to 2036, a commitment has been made by the NATS Board to update the strategy alongside the GNLP.

7 The Next Steps

Development of the 'plan alternatives'

7.1 Following the workshops the next stage for the GNLP will be the development of a series of options for the plan. The steer on key considerations from the GNDP Board, the outcomes of the stakeholder workshops, the evidence gathered to date and the results of meetings with key infrastructure providers will help to shape the content of the strategic policies and identify areas for possible growth in the GNLP.

7.2 The GNLP team is currently undertaking a high level assessment of the capacity of different locations to accommodate growth.

7.3 Member input in November will help identify a range of plan alternatives which can then be worked up further for members to review in early 2017. The robustness of this stage in the plan preparation will be essential to support the

choice of any favoured option for the Regulation 18 consultation. The timetable at appendix 1 provides details.

8 Issues and Risks

Other resource implications (staff, property)

- 8.1 As noted above, the Greater Norwich Planning Policy Manager has been appointed and a team of planning staff seconded from the four authorities. Provision is also being made for dedicated support staff. The budget to deliver the GNLP is being overseen by the IDB. The GNLP team has recently moved to permanent accommodation in County Hall.

Legal implications

- 8.2 The Greater Norwich authorities are required to have an up-to-date Local Plan and Broadland and South Norfolk Councils have made commitments through the examination of recent plans to a timescale for getting the GNLP in place. NPLaw is providing ongoing advice to ensure that the plan is produced in accordance with current Regulations and with any amendments to those Regulations.

Risks

- 8.3 The risk of not preparing a replacement for the JCS and maintaining a supply of allocated sites is that the plans become increasingly out of date and subject to challenge.
- 8.4 The GNLP is being produced to a streamlined timetable and requires prompt agreement across the participating authorities; the most significant risks are unforeseen events that cause delays within what is currently a very tight timeline and/or significant changes in Government policy which provide new challenges for the plan.

Equality

- 8.5 The GNLP will be supported by an Equalities Impact Assessment.

Environmental implications

- 8.6 The GNLP process is underpinned by national requirements to achieve sustainable development and is supported by both an HRA and SA process. The plan will also continue to identify Green Infrastructure and other environmental enhancements as part of the policies and proposals.

Officer Contact

If you have any questions about matters contained in this paper please contact:

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Appendix 1

Greater Norwich Local Plan: High Level Timetable to Adoption

