
GREATER NORWICH LOCAL PLAN

REGULATION 19 CONSULTATION

DRAFT LOCAL PLAN

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

March 2021

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

March 2021

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CONTENTS

	PAGE NO.
1.0 INTRODUCTION	01
i) National Planning Policy Framework	03
ii) Summary of these Representations to the Regulation 19 Grater Norwich Plan	05
iii) Sustainability Appraisal Review	05
2.0 LOCAL PLAN STRATEGY	07
3.0 THE CASE FOR WYMONDHAM	32
4.0 SUITABILITY OF LAND AT NORTH EAST WYMONDHAM	35

APPENDICES

APPENDIX 1	SITE LOCATION PLAN
APPENDIX 2	MARCH 2018 CONSULTATION REPS
APPENDIX 3	MARCH 2019 CONSULTATION REPS
APPENDIX 4	SUSTAINABILITY APPRAISAL REVIEW
APPENDIX 5	DRAFT GNLP STATEMENT OF COMMON GROUND

1.0 INTRODUCTION

1.1 These representations are submitted on behalf of Landstock Estates Ltd and Landowners Group Ltd (the Promoters) in response to the Greater Norwich Development Partnership (GNDP) consultation on the February – March 2021 Greater Norwich Local Plan (GNLP) Regulation 19 Consultation. The consultation comprises the following:

- Pre-Submission Publication Draft Plan comprising:
 - Document 1 – The Strategy
 - Document 2 – The Sites
- The Evidence Base, including the Site Assessment Booklets, Sustainability Appraisal, Strategic Housing Market Assessment (SHMA), Housing and Economic Land Availability Assessment (HELAA) and Infrastructure Needs Report.

1.2 The Promoters have land interests in North East Wymondham which has, in the main, been promoted through previous plan making exercises including the adopted Joint Core Strategy (2013) and Wymondham Area Action Plan (2015). A Plan of the promotion site (the Site) is included in **Appendix 1**.

1.3 The Site previously formed part of a wider promotion area which has subsequently been subject to several applications/appeals that have been granted/allowed within the north east Wymondham area. These parcels no longer form part of the site now being promoted, albeit they have been brought forward in a coordinated fashion to facilitate a potential future allocation of land including access rights, vehicle linkages and green spaces.

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

1.5 These representations should be read in conjunction with those submitted by the Promoters in response to the GNLP Growth Options Regulation 18 consultation undertaken January to March 2018 and the GNLP Draft Plan Regulation 18 consultation undertaken January to March 2020. A copy of these representations are included at **Appendix 2** and **Appendix 3** respectively. The key points raised from these responses are summarised below:

Regulation 18 (January – March 2018) Response (Appendix 2)

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

Regulation 18 (January – March 2020) Response (Appendix 3)

- Whilst recognition of the role of the A11, and the Cambridge Norwich Tech Corridor is welcomed, this is not reflected in the Growth Strategy;
- The Authorities have significantly underdelivered on housing against previous plan requirements. The full extent and seriousness of this shortfall is not acknowledged. There is a clear justification for a 20% buffer to be applied;
- The Standard Method is the 'minimum' starting point for determining the number of homes needed in the area, with the overall housing requirement needing to reflect City Deal requirements, alongside the appropriate 20% buffer. This would result in a requirement for 49,000 – 54,000 homes to be delivered in the Plan period;
- A full assessment as to whether existing allocations are deliverable within the Plan period needs to be undertaken, as clearly a number of sites have failed to deliver, or

are failing to deliver at anticipated rates which risks exacerbating the existing significant housing shortfall further;

- The approach to 'reserving' the allocation of 1,200 homes to South Norfolk villages as part of a separate Plan document is not appropriate;
- Focusing growth within the Cambridge Norwich Tech Corridor is vital to meet the plan's Visions and Objectives and promote economic growth to meet the City Deal aspirations;
- The Plan should include the use of a Policy area focused on the urban area and strategic accessible locations close and well connect to Norwich City, whether this be based on the established Norwich Policy Area or the SHMA Core Area;
- Wymondham, as the largest town in South Norfolk, within the existing Norwich Policy Area and SHMA Core Area, is one of the largest settlements on the Cambridge - Norwich Tech Corridor, and is a location which based upon past housing completions over the period 2012 - 2021 can be relied upon to actually deliver growth. In the context of under-supply and the unreliability of other locations to deliver on housing need, greater emphasis should be put on places where the market has to date, and is confident it can deliver, such as Wymondham;
- Wymondham should be supported for further growth including upgrading the 'contingency' to a full allocation;
- The promoted site, at Land at North East Wymondham, is deliverable in the short-medium term, providing a sustainable location for growth which can provide new homes and meet the immediate day to day convenience and education needs for this newly established and expanding community, and, crucially, provide a solution to the existing education capacity issue, subject to sufficient growth being allocated.

i) National Planning Policy Framework

1.6 The NPPF, published in February 2019, confirms at the heart of the Framework is a 'presumption in favour of sustainable development' (para 10) which should be applied for both plan-making and decision-taking (para 11).

1.7 Paragraph 11 confirms that, for plan-making, plans should positively seek opportunities to meet the development needs of their area and strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses.

1.8 As confirmed in paragraph 15, the planning system should be genuinely plan-led, with succinct and up-to-date plans providing a positive vision for the future of an area, addressing housing needs and other economic, social and environmental priorities.

1.9 Paragraph 16 confirms that Plans should be:

- Prepared with the objective of contributing to the achievement of sustainable development;
- Be prepared positively, in a way that is aspirational but deliverable;
- Be shaped by early, proportionate and effective engagement;
- Contain policies that are clearly written and unambiguous;
- Be accessible; and
- Serve a clear purpose, avoiding duplication.

1.10 Paragraphs 20 – 25 identifies that authorities should include relevant strategic policies for, and any necessary strategic site allocations to deliver:

- An overall strategy for the pattern and scale of development;
- The homes and workplaces needed, including affordable housing;
- Appropriate retail, leisure and other commercial activity;
- Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- Community facilities (such as health, education and cultural infrastructure); and
- Climate change mitigation and adaptation, and conservation and enhancement of the natural built and historic environment, including landscape and green infrastructure.

1.11 Paragraph 23 confirms the requirement for Strategic policies to provide a clear strategy for bringing sufficient land forward, at a sufficient rate, to address objectively assessed needs over the plan period, including allocating sufficient sites to deliver the strategic priorities of the area.

1.12 Paragraph 33 identifies that policies in Plans should be reviewed to assess whether they need updating at least once every five years.

1.13 Paragraph 35 confirms the tests of soundness against which Plans will be assessed:

- **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in this Framework.

ii) Summary of these Representations to the Regulation 19 Greater Norwich Plan

1.14 These representations respond to the content of the current Regulation 19 consultation, with reference where applicable to relevant policy, consultation documents and the evidence base. We reserve the right to comment on wider matters in future consultations or through Examination statements.

iii) Sustainability Appraisal Review

1.15 In addition to these Representations a Review of the Sustainability Appraisal (SA) has also been undertaken and is included in **Appendix 4** which concludes:

- There are areas of the SA which would potentially benefit from future consideration which would increase further the robustness of the SA and assist in achieving a 'sound' Plan;
- The site at North East of Wymondham should be selected for inclusion within any proposed site allocations within the GNLP based on its location, opportunities and performance against the SA Objectives;
- The Regulation 19 SA Report does not adequately reference the Cambridge Norwich Growth Corridor, SHMA Core Area or the Norwich Policy Area, when it is clear the GNLP should focus development here;
- Clearer justification should be provided as to why growth is directed to settlements outside of the Strategic Growth Area. A comparison between sites in Wymondham to the sites that have been allocated outside of the Strategic Growth Area concludes that it is clear these sites do not appear to have been selected on their sustainability credentials; and
- The SA does not provide rationale or certainty that all reasonable alternatives in Wymondham, beyond identified commitments, have been assessed for development.

There are more suitable sites within the growth corridor, including the Site, that have not been adequately considered or included for allocation.

2.0 LOCAL PLAN STRATEGY

- 2.1 The draft Plan identifies a joint planning strategy for growth across the Greater Norwich area (comprising Norwich City, Broadland and South Norfolk districts) for the period 2018 – 2038.
- 2.2 As detailed at paragraph 23 of the Draft Strategy, once adopted the Greater Norwich Local Plan (GNLP) will supersede the current Joint Core Strategy and the adopted site allocation plans across the 3no. districts. The GNLP will not replace existing adopted Area Action Plans for Long Stratton, Wymondham and the Growth Triangle, however additional allocations will be made in these areas.
- 2.3 'Document 1' of the GNLP Publication Draft Plan comprises the strategy, seeking to provide the strategic-policies necessary to meet the requirements of the NPPF including setting the overall strategy for the pattern, scale and quality of development and making sufficient provision for:
- Housing (including affordable housing), employment, retail, leisure and other commercial development;
 - Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy;
 - Community facilities, such as health, education and cultural infrastructure; and
 - Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 2.4 Specific allocations for how housing and other needs will be met are proposed through 'Document 2' of the GNLP Publication Draft Plan, which is assessed in Section 3 of these representations. Para 34 of the Draft Strategy identifies that the allocations of the 'Sites document' will provide the sites to meet the strategic needs as set out in the strategy.

The Plan Period

- 2.5 Para 22 of the NPPF concludes that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities.

- 2.6 The GNLP seeks to cover a period circa. 16-years post adoption and therefore meets this requirement.

The Housing Requirement

- 2.7 The Draft Strategy correctly identifies at para 177 that the Standard Method is the starting point for calculating local housing needs, calculated to be 40,541 across the period 2018 to 2038 at a required delivery rate of circa. 2,027 dwellings per annum.
- 2.8 Para 178 identifies that a buffer 'in excess' of the typical 10% is to be provided for by the Plan to ensure housing needs can be met whilst protecting against under-delivery and potentially accommodate higher growth rates as signalled by Government consultations and by the 2018-based household projections (the standard method being derived from the 2014 projections). A 22% buffer is identified to "cater for the potential for higher growth rates... [and to] mitigate any risk of non-delivery of sites to ensure delivery of local housing need".
- 2.9 We support this approach and consider that a 20% buffer as a minimum is wholly necessary to ensure housing needs are achieved when reflecting on past significant shortfalls against Joint Core Strategy requirements as summarised in Table 2.1 below. In total, shortfall across period 2008/09 – 2018/19 equated to circa. 19% of JCS requirements over that period.

Table 2.1: Greater Norwich/Joint Core Strategy Area Housing requirements and delivery (from JCS and Annual Monitoring Reports)

Monitoring Year	Housing Requirement (JCS)¹	Housing Delivery (JCS Area)	Surplus / Shortfall
2008/09	2,046	1,736	-310
2009/10	2,046	1,237	-809
2010/11	2,046	1,168	-878
2011/12	2,046	1,182	-864
2012/13	2,046	1,214	-832
2013/14	2,046	1,241	-805
2014/15	2,046	1,681	-365
2015/16	2,046	1,728	-318
2016/17	2,046	2,251	+205
2017/18	2,046	2,034	-12
2018/19	2,046	2,779	+733
Total	22,506	18,251	-4,255

- 2.10 A 22% buffer is therefore equitable, and wholly necessary to comply with the NPPF so as to help address past under-delivery that has been experienced across the authorities.

¹ 36,820 dwelling requirement across 18 year plan-period

- 2.11 Whilst it is recognised that the authorities have increased housing delivery in recent years, a significant part of that delivery has been on sites that are outside of the settlement boundaries. A review of South Norfolk District Council's Residential Land Availability assessments 2008 to 2019 (provided by the Council to the Promoters' via email) highlights that of 9,288 dwellings completed between 2008 and 2019, 3,242 of those (35%) were on land, that at the time planning permission was granted, outside of settlement boundaries. The RLA also highlights that of the 9,825 total commitments that existed at 31st March 2019, 3,762 of those committed dwellings are to be provided on sites which were at the time of permission outside of settlement boundaries, which equated to 38.2%.

Table 2.2: Summary of SNDC Residential Land Availability Assessments (2008 – 2019, as provided by SNDC via email): Norwich Policy and Rural Policy Area (Combined)

Period 2008 - 2019	Total Completions during period	Balance Commitments at 31 March 2019
Sites outside settlement boundaries at time of consent	3,242	3,762
Sites inside settlement boundaries at time of consent	6,046	6,063
TOTAL	9,288	9,825

- 2.12 Accordingly, the success of the Plan in meeting housing needs will rely heavily on sites that are truly deliverable. Many sites identified in the previous Joint Core Strategy were not deliverable, significantly constraining housing supply in the early years of the Plan. The delivery rates were heavily reliant upon development outside of settlement boundaries. That is in stark contrast with Paragraph 15 of the NPPF which highlights the need for Plans to be 'Plan-led'. Should the GNLP allocate the same, or similar sites that have not delivered to date, it will almost certainly result in significant shortcomings in housing delivery once more over the early years of the Plan, until such time as the allocations are successfully challenged and development progresses on non-allocated land in direct response to that failure. We set out later in this section, our concerns over the soundness of the approach adopted accounting for the past failures of the JCS, and how this may continue into the GNLP. An increased buffer is therefore necessary to address potential shortfalls before they occur, and based on Standard Method that minimum should be 48,541 new homes over the plan period to comply with the NPPF.
- 2.13 As well as ensuring a suitable uplift is provided to address under-delivery, we consider it necessary to include an uplift to accommodate the requirements of the Greater Norwich City Deal.

- 2.14 The Greater Norwich City Deal, signed with the government in December 2013, secured funding to enable knowledge-based industries to develop and grow, alongside the provision of essential housing, transportation, and utility services necessary to meet the infrastructure needs of a growing and expanding local economy.
- 2.15 As part of this, the City Deal committed the authorities (together as Greater Norwich) to bring forward an additional 3,000 homes by 2026 in the North East Growth Triangle, in addition to the Joint Core Strategy requirements.
- 2.16 Considering the under-delivery against Joint Core Strategy requirements as a whole (see table 2.1 above), these additional 3,000 homes remain undelivered, increasing the overall deficit to circa. 7,200 dwellings as of 31 March 2019.
- 2.17 Whilst paragraph 185 of the Draft Strategy notes the 'significant buffer' would build in flexibility to support higher than trend economic growth incorporating the Greater Norwich City Deal, clearly the additional 3,000 homes for which funding has been sought, and commitment been made, are not accounted for in the Plan's target of 49,492. This provision must sit outside of the housing need calculated pursuant to the Standard Method, which for the reasons above, we have advised needs to account for a minimum 20% buffer based on previous failings of under-delivery. We are conscious that the previous Joint Core Strategy did not account for this additional need, and it does not appear to have been accounted for here.
- 2.18 Accordingly, the additional 3,000 homes should be added to the overall housing requirement, resulting in a **minimum requirement of 51,541** dwellings should be targeted across the Plan period. The Standard Method would thereafter continue to apply for the purposes of calculating 5-year housing land supply post-adoption, but the authorities should still seek to make provision for meeting both its housing needs and the requirements of the City Deal in full through this plan-making exercise, and therefore the minimum housing requirement should be amended to **51,541 as a minimum**, and additional land should be identified that is available and deliverable in the early part of the Plan period to meet this additional 2,049 homes (which for reasons we set out below) needs to be expanded further through site allocations to address concerns relating to simply rolling forward/densifying allocations which have not delivered to date, windfall allowance, and the approach to smaller sites in villages.
- 2.19 In order to ensure the GNLP is **justified** and that it can effectively deliver upon the full housing needs of the GNLP the number of homes required should be increased to a minimum of 51,541. This highlights the need to allocate a further 2,049 homes.

2.20 We would also highlight the date of the Strategic Housing Market Assessment (SHMA), and the need for this to be updated if it is to be relied upon as part of a robust evidence base. The SHMA is key to dictating the type of housing need (i.e. the size of unit) and the location of development. Clearly the existing SHMA was developed well in advance of the latest NPPF and NPPG, further it was developed well in advance of the Pandemic. A review of the SHMA is considered necessary to ensure that housing mix is understood and that allocations can therefore be **effective** in meeting the identified need.

The Spatial Strategy

2.21 Paragraph 188 of the Draft Strategy sets out the key elements of the proposed Spatial Strategy these being:

- a) Maximising brownfield development and regeneration opportunities;
- b) Broadly following the settlement hierarchy in terms of scales of growth, reflecting access to services and jobs;
- c) Focusing growth in locations with best access to jobs, services and existing and planned infrastructure in and around the Norwich urban area and the Cambridge Norwich Tech corridor;
- d) Focussing reasonable levels of growth in the main towns, key services centres and village clusters to support a vibrant rural economy;
- e) Allocating strategic-scale housing sites (1,000 dwelling plus) in accessible locations;
- f) Allocation a significant number of medium scale and smaller scale sites in urban areas, towns and villages; and
- g) Setting a minimum allocation size of 12 – 15 dwellings to ensure a readily deliverable amount of affordable housing is provided on all allocation sites.

2.22 Table 7 of the Draft Strategy, replicated below, demonstrates the percentage growth anticipated between 2018 and 2038 based on areas of settlement hierarchy.

Area	Homes 2018	Homes 2038	Increase	% of total housing growth
Norwich Urban Area	106,100	138,791 (+32,691)	31%	66%
The Main Towns	19,400	26,206 (+6,806)	35%	14%
The Key Service Centres	15,900	19,579 (+3,679)	23%	7%

Area	Homes 2018	Homes 2038	Increase	% of total housing growth
Village Clusters	46,100	50,320 (+4,220)	9%	9%
Windfall and Homes from Policy 7.5	n/a	2,096	n/a	4%
Total	187,500	236,992 (+49,492)	26%	100%

- 2.23 Paragraph 193 of the Draft Strategy identifies that around 74% of planned growth is directed to the “Strategic Growth Area” focused around the main Cambridge Norwich Tech Corridor area, including Norwich, Hethersett and Wymondham, plus other areas north, east and west of Norwich, including the Growth Triangle and the remainder of the Norwich Fringe.
- 2.24 We welcome the recognition of the role of the importance of the Cambridge - Norwich Tech Corridor, as a clear and suitable location to focus growth, and broadly support the approach taken by the Council to focus on the Strategic Growth Area. However, no clarity is provided as to why the focus has not been directed to the Corridor, along the A11.
- 2.25 Recognition should be given to the recent Government commitment to the Oxford – Cambridge Spatial Planning Framework, which will have a status on par with the NPPF. Accordingly, any policies within Local Plans that fall within regions that have any geographical link to this region must be in accordance with the Framework as it emerges. The Oxford – Cambridge Spatial Planning Framework will focus on the delivery of up to 1million new homes, as well as significant infrastructure and economic development. The Tech Corridor between Norwich and Cambridge should therefore be afforded greater weight in the GNLP to recognise the increase in jobs and investment within that area, and the recognition that development should be focused wherever possible along strategic routes between the two cities – the A11 and the Cambridge to Norwich rail line. This corridor should be greater focus for development within the GNLP to ensure it is consistent with National Planning Policy (To include the Oxford – Cambridge Planning Framework) and to ensure it is considered to be a justified and effective strategy, that would meet the key tests of soundness defined in Paragraph 35 of the NPPF.
- 2.26 This approach would be consistent with that undertaken by Breckland Council, located to the south-west of the Authorities’ area, with the majority of its growth in the Local Plan 2019 focused along the A11 corridor including to the towns of Attleborough and Thetford with the Plan identifying this as a key focus for the delivery of growth and investment across the region.

2.27 As detailed in Table 2.4 below, outside of Norwich all the proposed new allocations are on land within the Growth Triangle or in Taverham, neither of which are within this most sustainable corridor area between Cambridge and Norwich. This further reinforces the points made above, that the Plan is not effectively highlighting the importance of the Cambridge – Norwich Tech Corridor and is therefore not **consistent with national policy**.

2.28 We consider the settlements highlighted in bold below in Table 2.4 are the locations within or in close proximity to (in the case of Three Score, Bowthorpe) the Cambridge – Norwich Tech Corridor where new allocations should be located to maximise the potential of this identified growth corridor.

Table 2.3: Existing and Proposed allocations within the Strategic Growth Area

	Location	Existing commitments (as per Policies 7.1, 7.2 and 7.3)	Proposed new allocations	Total housing commitment 2018 - 2038
Norwich Urban Area	Northern City Centre Strategic Regeneration Area	1,533	25	1,558
	Other city centre sites	2,724	200	2,924
	East Norwich Strategic Regeneration Area	770	3,230	4,000
Growth Triangle	The Growth Triangle	12,087	1,420	13,507
Norwich Fringe Parishes	Colney	4	200	204
	Costessey	529	0*	529
	Cringleford	1,771	0	1,771
	Drayton	404	0	404
	Easton	1,046	0	1,046
	Hellesdon	1,351	0	1,351
	Other sites in Norwich	2,160	180	2,340
	Three Score, Bowthorpe	908	0	908
	Taverham	121	1,417	1,538
	Thorpe St. Andrew	386	0	386
	Trowse	181	0	181
	Other sites in urban area (Old Catton, Keswick, Sprowston)	44	0	44
Main Towns	Wymondham	2,465	150	2,615
Key Service Centres	Hethersett	1,375	0	1,375
	Total	29,859	6,822	36,681

* Not including the 800 dwelling contingency site

2.29 Within the Strategic Growth Area, the majority of homes identified are on existing commitments.

- 2.30 What is not clear is the precise site boundaries of the sites, and whether allocations rolled forward from the JCS are being extended to include additional land, or whether the additional housing to these identified in the table above (including commitments) is purely from intensification. Site specific information and trajectories should be identified, including for sites rolled forward from the current Development Plan, to allow these to be properly scrutinised.
- 2.31 Paragraph 23 of the Draft Strategy identifies that the “great majority of undeveloped sites in the Site Allocations plans are re-allocated through the GNLP”, with footnote 5 noting this is subject to evidence of delivery by 2038. However, it is not clear what remains to be delivered on each allocation, and how the quantum and timing of delivery compares to the JCS.
- 2.32 As noted previously, the authorities have significantly under-delivered against requirements in the Joint Core Strategy Plan period. The previous Plan has failed to deliver the needs of the Greater Norwich Area, particularly in respect of housing and affordable housing needs. This has impacted on affordability and access to housing. To simply roll forward allocations that have failed to deliver seems to be wholly contradictory to addressing the failings of housing delivery against the JCS. The Council must provide evidence as to how this is justified, and considered to be the most effective means of addressing housing delivery accounting for:
- Evidence of how previous shortcomings of delivery have been overcome on a site by site basis;
 - Evidence of Funding/Infrastructure required to overcome previous failings of delivery on a site by site basis;
 - Housing and affordable housing trajectory for each site provided by the Developer(s), that confirms development is viable and will provide 33% affordable housing secured through Section 106 Agreements.
- 2.33 The GNLP should pro-actively be seeking to avoid repeating the same mistakes as the Joint Core Strategy, ensuring housing is only allocated to sites where there is a reasonable prospect of delivery (in line with the requirement of the NPPF).
- 2.34 We are concerned this is not the case, with the Draft Strategy over-relying on sites which have not delivered as anticipated against their Joint Core Strategy requirements, specifically within the Growth Triangle. Information provided to the Promoters’ by Broadland District Council via email confirm the following completions on Growth Triangle allocations across the period 2014/15 – 2019/20, totalling 900 dwellings:

- 2014/15 – 0 dwellings;
 - 2015/16 – 57 dwellings;
 - 2016/17 – 231 dwellings;
 - 2017/18 – 232 dwellings;
 - 2018/19 – 312 dwellings; and
 - 2019/20 – 68 dwellings.
- 2.35 Based on the Authorities' recently published 'Greater Norwich Area Housing Land Supply Assessment at 1st April 2020' the Growth Triangle sites are forecasted to deliver circa 3,800 dwellings in the period 2020/21 – 2025/26.
- 2.36 Against Joint Core Strategy expectations of 7,000 dwellings to be delivered by the Growth Triangle within the JCS Plan Period, this therefore represents a 2,300-dwelling shortfall. Including the City Deal requirements of 3,000 additional dwellings to be delivered within the Growth Triangle area within this period, the shortfall increases to 5,300 dwellings.
- 2.37 Based on past inaccurate forecasting, we expect this shortfall is likely to be far higher. It is therefore not clear why the Authorities are seeking to focus a further 1,420 homes (20% of the additional allocations to this area) to this area and also looking to 'roll forward' the Growth Triangle allocations without any additional evidence to demonstrate these sites will deliver within the Plan period.
- 2.38 Further, we have previously highlighted the shortfall in delivery of affordable homes is even more pronounced. The affordable housing policy target has been set at 33% yet, a recent officers report to committee, in respect of Planning Application 2020085 for 157 homes at Land south of Green Lane East, Rackheath officer's report to committee states that "**other developments across the Growth Triangle, and across Greater Norwich more generally have not been able to deliver affordable housing in line with the JCS target as amended and (historically) have not consistently achieved the annualised target of affordable homes per year**". Assessments indicated that the viable affordable housing level was likely to be 10%. Whilst this will need to be re-visited on submission of an application for this area, it is evident that there are likely to be viability issues in achieving policy compliant affordable housing in the wider strategic growth area. Given these clear concerns with regard to viability, it is unclear how extending allocations is the most effective or justified means of meeting the affordable housing requirements of the GNLP. We therefore contest that the housing distribution proposed is unsound as it is not clear that it will be **effective** at delivering on the housing and affordable housing needs of the GNLP.

2.39 The authorities approached site promoters / developers on the preferred option, reasonable alternative or existing sites proposed for reallocation in May 2020 and October 2020 seeking to agree Statements of Common Ground. A template was provided by the authorities in October 2020 requesting detail on:

- Site progress in respect of being available, suitable and deliverable;
- Land ownership constraints;
- Progress on seeking planning permission, including pre-application advice and preparation of an application;
- Commentary of the site's expected delivery;
- Commentary of engagement held with statutory bodies;
- Detail on known technical constraints; and
- Confirmation of the proposed community benefits the site could offer.

2.40 The Promoters' returned their draft Statement of Common Ground, for North East Wymondham, to the authorities on 26 October 2020. A copy of this, which remains in draft with no feedback received from the authorities, is included in **Appendix 5**.

2.41 It is unclear what responses the authorities have received from other promoters / developers with this information not available online, despite the authorities noting (in its 07 October 2020 letter) the "importance of agreeing a SoCG should not be under-estimated, and a site is unlikely to be allocated in the GNLP unless a SoCG is agreed".

2.42 A more recent letter, dated 22 January, sent to sites proposed for allocation, makes clear that confirmation of allocation will be subject to demonstrating the site is deliverable with records indicating Statements of Common Ground have not been returned and are overdue.

2.43 It is therefore not possible for the expected delivery of these sites to be fully scrutinised at this time. Accordingly, in the absence of information we have requested at paragraph 2.31 (above) the proposed housing distribution set out in Policy 1 of the GNLP can only be considered to be unsound, as it cannot be scrutinised as to whether the allocations identified will be **effective** in delivering upon the housing and affordable housing needs of the GNLP. We reserve our right to respond further on a site by site basis when this information is made available. However, it is clear some responses have not been returned and where they are absent, the Plan as currently drafted is not considered to be **justified** or **effective**. Should the evidence remain absent or be insufficient, it will remain unsound for the same reasons, with a need to identify additional land to meet housing requirements.

- 2.44 The Delivery Statement at para 155 of the Draft Strategy confirms a pro-active approach to delivery will be progressed only through allocating housing sites where a reasonable prospect of delivery can be evidenced. As highlighted previously, this clearly has not been achieved.
- 2.45 In any event, there has been significant and persistent delays in delivery of sites relied upon by the Joint Core Strategy. The rolling-over of these allocations into the GNLP undermines confidence in the Plan to deliver on its needs to 2038.
- 2.46 Evidence is not provided to demonstrate these sites will deliver within the proposed Plan Period. As such, the Plan is not considered to be **justified, effective** or **positively prepared** on this basis.
- 2.47 To summarise the Spatial Strategy is considered to be **unsound**. There are three distinct reasons for this:
1. We have identified that an additional 2,049 homes need to be allocated to account for a 20% buffer and to account for The City Deal, which is necessary to ensure that the Plan is **Positively Prepared** and is **effective** at meeting its housing need over the plan period.
 2. The focus of additional growth, particularly by way of new allocations is outside of the most sustainable corridor between Cambridge and Norwich. This corridor is served by a railway and the main A11 trunk road, providing fast access to significant economic growth that will be planned for within the Oxford – Cambridge Planning Framework. The strategy to accommodate further growth to the Northeast of Norwich, and a further 1,417 dwellings at Taverham is clearly in locations that are (a) outside of this key growth corridor; (b) not served by as wide a range of public transport and sustainable travel routes into Norwich, or Cambridge; and (c) the sites selected have not delivered housing as planned to date (see 3 below). A Policy should be identified to highlight the importance of the Cambridge – Norwich tech Corridor, to ensure **consistency with national policy**, and to ensure development in that area is **positively prepared** and **effective** at delivering housing in that area, so as to make the greatest possible contribution to housing requirements across the GNLP;
 3. There is no evidence from Statements of Common Ground with regard to the anticipated levels of delivery and/or viability of the current site allocations, or the extended site allocations that is sufficient to determine whether the allocations within

the Spatial Strategy themselves are **justified**, or whether they would be **effective** in delivering the housing needs of the GNLP.

- 2.48 The additional homes that are identified as not being justified, or effective, will need to be redistributed to the most sustainable locations within the settlement hierarchy, where there is a history of delivery, such as Wymondham.
- 2.49 We have not sought to forensically review the proposed allocations at this time, partly for the reasons as set out above, however we note the following concerns in respect of the 3no. largest proposed new allocations within the GNLP.
- 2.50 The East Norwich Strategic Regeneration Area is identified to deliver 4,000 dwellings across the Plan period, of which 3,230 are new allocations. The majority of the existing commitment for this area relates to the Land at Deal Ground site which benefits from extant Outline planning consent for 580 dwellings (Norwich City Council ref. 12/00875/O) approved July 2013, however this has not yet progressed and no trajectory for delivery is identified within the AMR 2018/19. The Outline consent requires Reserved Matters to be submitted no later than 10-years from the date of consent, reflecting potential uncertainty and delays in potential delivery.
- 2.51 In addition to the Deal Ground site, the GNLP seeks to allocate land at Carrow Works and the Utilities Site, together making up the Regeneration Area. The Sites Document identifies a number of key considerations including the need for an area-wide masterplan including consideration of phasing, the need for “substantial” new transport infrastructure, the remediation of the land accounting for historic industrial land uses, and consideration of the locality of the area within a Conservation Area and nearby assets of landscape and biodiversity importance.
- 2.52 Together, these will provide for a high-density new development on the edge of Norwich. Not accounting for constraints across the sites, of which there are numerous including areas of flood risk, tree preservation orders and assets of heritage value, the net density would be more than 80 dwellings per hectare. Such a density is very unlikely to deliver ‘family homes’ including gardens which are expected to be in demand in a post-COVID housing market. This is a common concern of allocating land for higher density development, particularly where the Authorities are proposing to increase housing numbers through densification of existing commitments. The Authorities should demonstrate the anticipated unit mix, and how this relates to housing need for both private and affordable housing.

- 2.53 Whilst we do not object to the principle of this major brownfield site being developed, the trajectory for delivery (which is not provided) needs to be realistic, and be able to meet local needs in terms of unit sizes, otherwise it is wholly **ineffective** in addressing the housing needs of the GNLP. In addition, no evidence is provided to demonstrate the viability of delivery of the Regeneration Area, with major costs likely to include road / transport infrastructure, de-contamination of industrial land, new utility infrastructure and enhanced flood defences. Similarly, no evidence is provided to demonstrate the proposed quantum of development and necessary heights / density are suitable for the sites, when considering on-site and nearby sensitive receptors.
- 2.54 Further work should be progressed to demonstrate the suitability and deliverability of the Regeneration Area, and how it would respond to the published housing need, before it is relied upon to deliver a significant element of the GNLP housing requirements. At the current time, we do not believe the proposed Regeneration Area allocation is **justified** nor would it be **effective**.
- 2.55 An additional 1,420 dwellings are identified to be allocated within the Growth Triangle area, in addition to existing commitments totalling 12,087 dwellings. The majority of the proposed new allocations are to be delivered at Land at Blue Boar Lane / Salhouse Road, White House Farm, Sprowston, identified for 1,200 dwellings and new Secondary School. This proposed site is located to the east of existing allocations (through the Growth Triangle Area Action Plan) at GT4, GT5 and GT20 and north of GT7. Of these, GT4 (Home Farm) and GT5 (White House Farm) were subject to extant consent at the time of adoption of the Area Action Plan and have both subsequently begun delivery.
- 2.56 The AMR 2018/19 identified an expectation for GT7 (Land South of Salhouse Road) to commence in 2017/18 however this had not been achieved with commencement behind the milestone. The site has part Outline and part Detailed consent, with a total of 1,168 dwellings identified, fewer than the policy allocation expectations of 1,400 dwellings.
- 2.57 Allocation GT20 (White House Farm (North East)) is subject to an application for Outline planning permission submitted August 2019. This application is still pending determination. The application seeks permission for 456 dwellings, broadly in line with the expectations for the site (of 460 dwellings) but behind the milestone for commencement of 2020/21.
- 2.58 Whilst this area is one of the few within the Growth Triangle which actually has begun delivery, this has only been achieved on sites which had existing consents at the time of adoption of the Area Action Plan. The other allocations noted above have failed to achieve commencement milestones.

- 2.59 A development consortium (Persimmon Homes, Hopkins Homes and Taylor Wimpey Homes) have been responsible for delivering GT5 and will subsequently be delivering GT20 once this is complete. It is unclear if this same consortium is promoting the Land at Blue Boar Lane / Salhouse Road, White House Farm, Sprowston site, but if this is the case it is unlikely this new allocation would be developed until GT20 is complete. No trajectory is provided, however if this were the case, we would expect the GNLPS to reflect this which would result in a start date for the proposed new allocation beyond 2026. It may be this site is therefore not expected to fully deliver within the Plan period.
- 2.60 Based on the evidence available, and the historic under-delivery of Growth Triangle sites alongside the slower than anticipated delivery rates of those adjoining Area Action Plan allocations, we do not believe the proposed additional Growth Triangle allocation is **justified** nor would it be **effective** in delivering required housing needs.
- 2.61 Outside of the Growth Triangle, Taverham is identified as a significant focus for growth with 1,417 dwellings to be delivered through a new allocation at Land between Fir Covert Road and Reeham Road. The settlement of Taverham is located to the north-west of Norwich and is one of the most distant 'Fringe Parishes' from Norwich city centre and disconnected from the A11 with no direct A-road route to this key corridor. The allocation of a significant element of growth in this location therefore seems illogical and should instead be re-located to a suitable location on the A11 Cambridge – Norwich Tech Corridor.
- 2.62 The proposed Norwich Western Link located to the west of Taverham would assist in increasing connectivity between the settlement and the A11 corridor, via the A47, however this major element of infrastructure is not yet committed, awaiting funding. It therefore cannot and should not be relied upon.
- 2.63 We therefore do not consider the proposed allocation within Taverham to be **justified** or **consistent with national policy**.

Outside the Strategic Growth Area

- 2.64 Outside of the 'Strategic Growth Area' there remains a number of areas proposed for new allocations (not including South Norfolk village clusters and windfall), as detailed below.

Table 2.4: Proposed new allocations outside of Strategic Growth Area

		Location	Existing commitments (as per Policies 7.2 and 7.3)	Proposed new allocations	Total housing commitment 2018 - 2038
Main Towns		Aylsham	229	550	779
		Diss	363	400*	763
		Harleston	172	555	727

Key Service Centres	Acle		200	340	540
	Loddon/Chedgrave		206	240	446
	Hingham		20	100	120
	Blofield		301	15	316
Villages	Broadland Villages Clusters		n/a	482	482
Total proposed new allocations				2,682	

** of which 250 are to be allocated through the Diss Neighbourhood Plan*

- 2.65 No clear justification is provided as to why this substantial element of growth, equating to circa. 26% of new allocations made through the GNLP, is directed to settlements outside of the Strategic Growth Area, or indeed the Growth Corridor between Cambridge and Norwich. Further, the Authorities have identified a settlement hierarchy within Policy 1. Wymondham is the largest settlement outside of Norwich within the three Authorities. Also it benefits from a railway station with regular services to and from Cambridge and Norwich. It also is identified on the Key Diagram as having a strategic Cycle Link into Norwich City Centre, as well as regular bus services, and the A11 link between Norwich and Cambridge. Wymondham also has a far greater range of shops and services than other centres. However, Wymondham is allocated only 150 additional homes through the Spatial Strategy. It has been apportioned the a lower number of additional homes than any of the other main towns, and the Key Service Centres of Chedgrave, Loddon or Blofield. This appears wholly contrary to the principles of sustainable development.
- 2.66 The approach appears to contradict the 'key elements' set out under paragraph 188 most notably reflecting access to services and jobs (with Norwich being the key location for these across Greater Norwich) and focusing growth around the Norwich urban area and the Cambridge - Norwich Tech corridor.
- 2.67 Whilst we have no objection to the Main Towns receiving additional growth to ensure they continue to successfully achieve their roles as providers of employment and services to serve rural areas, this needs to be carefully considered in the context of the overall spatial strategy.

- 2.68 We question why Harleston and Aylsham, as the smallest Main Towns, are identified for allocations of 555 and 550 dwellings respectively in addition to existing commitments. Neither of these towns are located within the Strategic Growth Area, nor are they located on the rail network. In addition, Harleston is not located on an A road which connects to Norwich.
- 2.69 Similarly, the growth proposals for Acle and Loddon/Chedgrave are excessive given the existing size of the settlements and the proximity of these settlements to the Broads. The scale of development proposed within the smaller settlements (i.e. below 500 units) is not sufficient to support additional services (i.e. school, health services etc), and in turn place a further drain on services that exist in those centres. Further the numbers are insufficient to support additional shops/services that might make the settlements more sustainable.
- 2.70 The reason for not allocating additional land at Wymondham seems simply to be that there has been development there in the past. However, that only serves to highlight that it is an appropriate location to deliver sustainable development.
- 2.71 The Draft Strategy is currently **unjustified** with no clarity provided as to why settlements outside the Strategic Growth Area, the former Norwich Policy Area, or the Cambridge – Norwich Tech Corridor are identified for further growth beyond existing commitments, or why the housing distribution is at odds with the Settlement hierarchy identified in Policy 1. The strategy must be amended to ensure development is directed to the most sustainable locations, **consistent with National Policy** and to ensure that the Spatial distribution of housing is robustly **justified** and **effective** to meet housing need. This can be addressed by directing additional allocations to the areas most suitable for further growth within the Strategic Growth Area, i.e. to Wymondham.

The Main Towns

- 2.72 Of the Main Towns, only Wymondham is located within the Strategy Growth Area. As noted above, we question the approach taken to allocating further development to the Main Towns outside of the Strategic Growth Area. Conversely, despite it being the largest of the main towns, with the greatest number of shops/services, the only town (aside from Diss) on a mainline railway line, and the closest centre to Norwich (within a Strategic Growth Corridor) linking Norwich and Cambridge, Wymondham is only identified for 150 additional dwellings.
- 2.73 The Main Towns are identified to play a vital role in the rural economy, providing employment opportunities and services for wider hinterlands. We support Wymondham's recognition as a Main Town but consider Wymondham to have additional roles and services which elevates it

above the other Main Towns within the hierarchy. To be **justified** we believe the hierarchy needs to be adjusted to reflect Wymondham's size and status over and above the other towns.

- 2.74 Directed linked to the above, in considering the Draft Strategy focus within the Strategic Growth Area, and Wymondham's key location within this, it is unclear why Wymondham is not a key location for growth and separated out as such in the settlement hierarchy.
- 2.75 Wymondham is a settlement at least twice the size of any subsequent settlement, and given the services available, to make the settlement hierarchy **justified** it should be identified as a 'Large Main Town' in a means that separates it from the other towns.
- 2.76 Wymondham had been identified within the Regulation 18 consultation undertaken in January – March 2020 as a location to accommodate a contingency of 1,000 dwellings. This has since been removed from the Draft Strategy with no justification provided as to why this is not included. Conversely, the contingency site proposed in Costessey remains despite it not having a Train Station, or being located within the Cambridge – Norwich Growth Corridor. Unlike other locations where delivery has failed, housing delivery has been consistent within Wymondham, reflecting its sustainable location. The fact that growth of up to 1,000 units was previously identified only serves to highlight that there is no obvious environmental constraint to its further expansion as a town. In light of the above:
1. Wymondham should be identified within the Strategic Growth Area and as a key settlement within the Cambridge to Norwich Corridor;
 2. Wymondham should be identified as a 'Large Main Town' above the other settlements in the Hierarchy;
 3. In the absence of any clear environmental constraint, new housing allocations should be re-distributed, among the main towns to focus additional growth at Wymondham reflective of its status in the hierarchy – i.e. it should be the principle location for growth below Norwich;
 4. Additional housing identified to accommodate the City Deal, and/or as a result of unjustified allocations (not supported by sound evidence of viability and deliverability) should be directed to Wymondham as a sustainable location that has successfully delivered housing to date.

The Village Clusters

- 2.77 The Draft Strategy identifies 1,682 dwellings to be delivered through new allocations within the 'Village Clusters', including 482 dwellings in Broadland allocated through the GNLP and 'at least' 1,200 dwellings to be allocated within a separate South Norfolk Village Clusters Housing Site Allocations document. These are in addition to existing commitments for Broadland of 1,146 dwellings and South Norfolk of 1,392 dwellings.
- 2.78 The 'village clusters' are at the very bottom of the settlement hierarchy for the authorities, covering the areas within Greater Norwich not considered part of the Norwich Urban Area, Main Towns, or Key Service Centres. They are locations outside of the Norwich Policy Area defined in the JCS and outside of identified growth corridors.
- 2.79 In the main, the clusters are therefore likely to be the least sustainable locations across the Greater Norwich area, yet they are proposed to accommodate 16% of the additional housing growth of the GNLP. Allocating a significant element of the overall growth requirements of the GNLP to these areas, where there are limited services, no cycle facilities and limited public transport, would be contradictory to the principles of sustainable development and the overall Vision of the Plan. Accordingly it is clearly not **justified** and clearly **not consistent with national policy**.
- 2.80 The Plan proposes a mechanism to allow small-scale appropriate growth of parishes, through Policy 7.5 (detailed below), which is proposed to deliver a further 800 dwellings, the majority of which would be within these 'clusters'.
- 2.81 Taken together, the village cluster allocations alongside Policy 7.5 expectations are identified to deliver 2,482 dwellings above existing commitments – which equates to 23% of all additional housing need allocated in the GNLP. This is more than the additional allocations proposed for the Main Towns and Key Service Centres together.
- 2.82 Policy 7.5 provides a mechanism for sites to come forward adjoining rural parish boundaries. We do not believe the need for further allocations beyond this has been justified. We cannot see how it responds to the principles of sustainable development, or whether an effective assessment has even been undertaken to assess what the environmental impact would be of accommodating these additional homes in small settlements. For example, if many villages or small sites are not appropriate for growth, does that mean that large additions will be made to small centres? If an additional 2,482 housing units are simply spread across rural locations, it is not clear how many would go where, whether this would be viable, whether the additions would be sufficient to meet the threshold upon which affordable housing is to

- be delivered etc. The approach is not sound. It is contrary to **National Planning Policy** which seeks to direct sustainable development to the most sustainable locations, it is clearly not **justified** (given the scale of development in each settlement is unknown) and at present it is **ineffective**, as in the absence of allocations or revised settlement boundaries, this would represent development in countryside, for which there is no means of securing planning permission that would accord with the Development Plan.
- 2.83 In addition, the approach to 'reserve' allocation of 1,200 dwellings to South Norfolk village clusters to a separate Plan document is not effective or justified. This approach pre-judges that is the right number of homes to be allocated, before a full assessment of where housing could most sustainably be accommodated. Development within these village clusters will predominately be reliant on the private car, totally at odds with the principle of sustainable development.
- 2.84 Allocations of all sites should be brought into this one Plan, ensuring the complete strategy for meeting housing needs is comprehensively considered now, including through the accompanying Sustainability Appraisal. At the current time the approach is not considered **justified, effective** or **consistent with national policy** and therefore results in a Plan which is unsound.
- 2.85 Complete uncertainty is left over the delivery of 23% of the additional housing need for the GNLP, within the least sustainable locations at the bottom of the settlement hierarchy. This figure increases to 35% accounting for windfalls. This cannot be considered 'sound' plan making. To make the Plan sound, all housing need should be directed to the most sustainable locations, higher in the hierarchy of centres, and allocated. An allowance can then be made for 'windfalls' based on previous records of delivery wherever it can be demonstrated as required across the Plan area. The approach proposed effectively provides for 4 x sets of windfalls, totalling 3,778 homes (35% of the entire additional land to be allocated), 66% of which are to be in the least sustainable locations.
- 2.86 This leaves even further uncertainty over the viability and deliverability of affordable homes if as we suspect a very high number of these smaller forms of development would potentially fall below the threshold upon which affordable homes is required.
- 2.87 Accordingly, a total of 2,482 homes should be re-distributed to sustainable locations higher up the settlement hierarchy such as Wymondham, where there is a record of delivery. This is in addition to the 2,049 homes we have identified as being required to meet the GNLP's full housing need (2,049 + 2,482 = 4,531 homes to be identified through alternative

allocations, before any adjustment is made due to viability/deliverability of long-standing allocations.

Windfalls

- 2.88 Paragraph 70 of the NPPF states that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Accordingly, we have no in-principle objection to a windfall allowance, any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.
- 2.89 Included within the 22% buffer proposed is a considerable allowance for windfall development, i.e. sites not specifically identified within the Development Plan (as defined by the NPPF).
- 2.90 The Draft Strategy splits these into 2no. categories:
- Homes delivered through policy 7.5; and
 - Windfall allowance.
- 2.91 Policy 7.5 positively allows small scale residential development adjacent to a development boundary or on small sites within or adjacent to a recognised group of dwellings, up to 3 dwellings in total in small parishes or 5 dwellings in total in larger parishes during the lifetime of the Plan. A total of 800 dwellings are identified to be expected to be delivered through this policy. However, it is not effective because it will result in development below the threshold upon which affordable housing is required.
- 2.92 Appendix 7 provides clarity on what constitutes a small or large parish. In total, 55no. small parishes and 129no. large parishes are identified. As such, a theoretic maximum of 810 dwellings could be delivered through Policy 7.5 (55 x 3 dwellings and 129 x 5 dwellings), with zero affordable housing.
- 2.93 Whilst it is considered very likely the maximum threshold would be achieved in the largest parishes, it is considered highly unlikely in others. By way of example, Alderford and Little Witchingham parishes located in Broadland currently have 16 and 14 households respectively.
- 2.94 In addition to the above, 1,296 dwellings are identified to be delivered as 'windfall allowance'. Paragraph 184 identifies that this is based on previous local trends, however no data is

provided within the Strategy or the evidence base to justify this. If it is not **justified**, it cannot be sound, and would not be **consistent with national policy**.

- 2.95 There is potential for double-counting between the authorities expectations for Policy 7.5 sites and windfall sites, as well as those sites which are to be allocated, either now through the Broadland Village Clusters (which form part of the GNLP), or in the future, through the South Norfolk Village Clusters Housing Site Allocations document (which is proposed to include a 'minimum' of 1,200 dwellings). Such double counting would not be **effective** and would not deliver on the housing needs of the GNLP in a Plan led manner **consistent with National Policy**.
- 2.96 We do not consider the authorities estimation of supply from Policy 7.5 to be realistic and do not believe there is compelling evidence for the expectations arising from this or from the general windfall allowance. Whilst windfalls (both combined) only make up circa. 4.2% of the overall housing provision, these consist circa. 16.4% of the 'new' GNLP provision (i.e. not existing commitments / allocations or delivered dwellings).
- 2.97 This is therefore a considerable element of the GNLP which should instead, along with the additional need for 2,049 homes, and any re-distribution due to deliverability/viability of long-standing allocations, be re-distributed to sustainable locations higher up the settlement hierarchy such as Wymondham where there is a clear record of deliverability. Any windfall, including provision arising from Policy 7.5, can thereafter be in addition to the housing requirements necessary to deliver housing needs, but not needed to be relied upon. This approach would ensure the GNLP was effective in delivering upon its housing need.
- 2.98 We consider the current approach to windfalls is unjustified, not effective and not consistent with national policy. This accounts for a further 1,296 residential units to be re-allocated, in addition to the 4,531 homes we have identified above at Paragraph 2.61 (1,296 + 4,531 = **5,825**) homes that need to be re-distributed to sustainable locations such as Wymondham, before any additional adjustment is made due to viability/deliverability of long-standing allocations rolled over and extended from the Joint Core Strategy.

Affordable Housing

- 2.99 Paragraph 58 of the Draft Strategy identifies that 28% of the housing required from 2015 to 2038 should be affordable housing, referencing the SHMA 2017. This data is considered out-of-date, being based on pre-Standard Method and pre-COVID expectations.

2.100 Policy 5 (Homes) identifies at least 33% affordable housing is to be sought across the Greater Norwich area, except in Norwich City Centre where the requirement is at least 28%, reflect potential viability issues with brownfield sites.

2.101 In any event, the success in meeting affordable housing needs will rely heavily on suitable deliverable sites being identified to deliver this. This has not been the case historically, with the authorities significantly under-delivering against Joint Core Strategy requirements, as summarised below in Table 2.5.

Table 2.5: Greater Norwich/Joint Core Strategy Area Affordable Housing requirements and delivery (from JCS and Annual Monitoring Reports)

Monitoring Year	Affordable Housing Requirement	Affordable Housing Delivery (JCS Area)	Surplus / Shortfall
2008/09	659	684	+25
2009/10	659	322	-337
2010/11	659	243	-416
2011/12	659	394	-265
2012/13	659	407	-252
2013/14	659	245	-414
2014/15	659	243	-416
2015/16	659	222	-437
2016/17	659	456	-203
2017/18	659	531	-128
2018/19	659	724	+65
Total	7,249	4,471	-2,778

2.102 Against completions over the same period the actual delivery of affordable housing per authority is:

- Broadland – 26.8% (1,168 affordable dwellings out of a total of 4,361 dwellings);
- South Norfolk – 23.3% (2,204 affordable dwellings out of a total of 9,467 dwellings);
- Norwich – 25.0% (1,099 affordable dwellings out of a total of 4,393 dwellings); and
- Total – 24.5% (4,471 affordable dwellings out of a total of 18,221 dwellings).

2.103 As stated earlier in these representations, a recent committee report published by Broadland in respect of Planning Application 2020085 for 157 homes at Land south of Green Lane East, Rackheath acknowledges that there remains a backlog for affordable housing and that **“the AMR cautions that continuing to meet the delivery target across the Greater Norwich Area will be a challenge”**. Furthermore, the report notes **“other developments across the Growth Triangle, and across Greater Norwich more generally have not been able to deliver affordable housing in line with the JCS target as amended and**

(historically) have not consistently achieved the annualised target of affordable homes per year". The application in question provided viability evidence demonstrating only 10% provision could be accommodated by the development.

- 2.104 The above clearly highlights ongoing future concerns over the delivery of affordable housing within the Growth Triangle (which is subject to deliver a project 13,507 homes – 27% of all homes in the GNLP) which is dependent on large scale infrastructure. We have also highlighted that 2,482 homes are to be delivered through the villages clusters of South Norfolk, through Policy 7.5 and within Broadland, , against which no certainty can be provided over the viability or deliverability of affordable housing due to the small nature of development to be allocated likely being below the threshold upon which affordable housing is sought, when coupled with windfalls, uncertainty over deliverability of affordable housing is clearly apparent upon at least 17,285 homes (13,507 + 2,482 + 1,296). This represents 35% of all housing. It is clearly not an **effective** strategy to deliver the affordable housing needs of the GNLP.
- 2.105 The authorities have not provided any clarity or effective strategy on how they intend to deliver circa. 13,350 affordable homes (33% of the Standard Method requirement) across the Greater Norwich area across the period 2018 to 2038.
- 2.106 The absence of a continuing supply of affordable housing creates significant consequences for people trying to find homes, which is in direct contradiction to the NPPF which defines sustainable development as **"...meeting the needs of the present without compromising the ability of future generations to meet their own needs"**.
- 2.107 Further evidence should be provided by the authorities to demonstrate:
- a) The affordable housing provision arising from the 5,240 dwellings built in 2018/19 and 2019/20;
 - b) The known affordable housing provision secured through Section 106 agreements, or similar, for permitted developments not currently built-out;
 - c) The expected affordable housing provision from other 'existing commitments' including evidence of discussions and agreements with developers or promoters in this regard; and
 - d) Confirmation from developers or promoters that the sites proposed as new allocations can viably achieve affordable housing requirements consistent with policy (i.e. 33%).

- 2.108 Should it be demonstrated the authorities are unable to achieve the minimum level of delivery requirement to meet affordable housing needs, further suitable and deliverable sites should be allocated to achieve this, and where appropriate allocations should not be extended from the JCS.
- 2.109 We consider the Draft Strategy currently fails to provide an effective strategic policy for affordable housing and therefore is not **effective, consistent with national policy and not positively prepared**.

Strategic Infrastructure - Education

- 2.110 Education has and continues to be a key issue for the GNLP to consider. The Greater Norwich Infrastructure Needs Report (January 2021) identifies Norfolk County Council's current plans for schools across the Greater Norwich Area which primarily comprises new and additional primary education capacity. Enhancements to secondary capacity are also proposed with the expansion of Sprowston Academy, Costessey Ormiston Victory Academy, both from Autumn 2021, and a proposed new secondary school in the Growth Triangle.
- 2.111 As such, no solution is proposed to the long-standing constraints on secondary education capacity in south of the District and within Wymondham.
- 2.112 The continued lack of positively addressing the secondary education capacity in Wymondham (or the wider South Norfolk area) is creating both a short term problem and exacerbating pressure on the existing school infrastructure.
- 2.113 As a result, the lack of school places is at odds with the requirement of paragraph 20 of the NPPF which identifies education as a strategic policy required for each authority to plan for. As drafted therefore the Plan is not **consistent with National Policy** or **effective** in delivering upon educational needs.
- 2.114 Norfolk County Council's latest Schools' Local Growth and Investment Plan (February 2021) confirms that Wymondham High Academy has over admitted for Year 7 for the past 2no. years. Whilst there are plans to accommodate additional pupils, the current commitments are putting pressure on this existing secondary education facility. Over the medium/long term options / creative solutions will likely be necessary to increase secondary and sixth form capacity in Wymondham.
- 2.115 As detailed in our response to the GNLP Draft Plan Regulation 18 consultation (**Appendix 3**) the Promoters have previously met with the Education Authority (Norfolk County Council) to

understand how a suitable solution to the education capacity issue could be delivered. This confirmed there is unlikely to be sufficient growth or funding to justify a new secondary school and instead the preferred strategy was to expand Wymondham High. This can be achieved through the appropriate re-location of the existing sixth form off-site and expansion of secondary provision on-site.

- 2.116 In order to secure an approach consistent with the requirements of paragraph 20 of the NPPF and ensure a sound plan is achieved, the GNLP should acknowledge and seek to resolve the persistent secondary education constraint in Wymondham (and wider South Norfolk area) through securing land for a new sixth form building. This can be successfully delivered on the Promoters' land at North East Wymondham.

3.0 THE CASE FOR WYMONDHAM

- 3.1 As noted in the preceding section, we do not consider the Plan to be sound. We do not believe it is positively planned to meet housing and affordable housing need (a shortfall of 2,049 homes), is not justified, and would not be effective at delivering those needs. The key failing of the Draft Strategy in these regards is how the distribution of growth has been approached. Together, and, prior to the Council presenting evidence as to the deliverability and viability of existing long-standing site allocations, there is a need to accommodate or re-distribute up to 5,825 homes. This should be within the most sustainable locations within a re-defined Strategic Growth Area.
- 3.2 A Strategic Growth Area has been suitably identified but does not really account for the Cambridge – Norwich strategic growth corridor. The heart of the corridor should focus on Norwich, the A11 and rail links to Cambridge. Notwithstanding, only 6,822 additional dwellings are proposed for the area above existing commitments (only 64%). Of this, 3,320 are in a single location in East Norwich and 1,420 and 1,417 dwellings proposed for the Growth Triangle (an area we have already indicated to have past deliverability issues) and Taverham respectively. Each of these locations are geographically on the edge of the Strategic Growth Area, and entirely outside the A11/Cambridge to Norwich Growth corridor. This places enormous pressure upon the creation of new jobs in Norwich. Accessibility to other major employment centres such as Cambridge is far more difficult from these peripheral locations. Indeed, only a very small number of new homes are proposed in the corridor between Cambridge and Norwich, which is best served by public transport and likely to provide access to the greatest growth in employment.
- 3.3 Other areas of the Strategic Growth Area, and in particular the Cambridge – Norwich Corridor have been overlooked in favour of accommodating homes in smaller and less sustainable settlements outside of it.
- 3.4 As detailed in Section 2, we consider the Strategic Growth Area should have greater focus on the Cambridge – Norwich Corridor. This would make better use of public transport and existing strategic links. A policy should be created to reflect the status of this corridor. Furthermore, Wymondham should be considered a 'Large Main Town', separating it from the other towns which are considerably smaller in size. Wymondham is over double the size of the next Main Town (Diss), and the facilities available in Wymondham reflect that.

- 3.5 The town is served by the A11, served by a major train station which has regular services to the regional employment hubs of Cambridge and Norwich, and a Strategic Bus Corridor connects Wymondham to Hethersett and Norwich, and on the cycle network into Norwich.
- 3.6 In addition to access to employment opportunities elsewhere, the town has significant existing employment including at the identified Key Strategic employment sites at Browick Interchange and nearby at Hethel.
- 3.7 Wymondham is therefore one of the most sustainable locations which can achieve the growth required by the GNLP, with good access to public transport and the major road network, facilities and services and existing employment opportunities. As a key location within the Cambridge Norwich Tech Corridor, Wymondham should be supported for further growth including further new allocations.
- 3.8 In addition, Wymondham is a location which can support a broad range of homes, including family homes, as opposed to development within the urban area of Norwich which will be unlikely to deliver housing tailored to need (e.g. a reliance on flatted development to achieve density requirements). The Strategic Housing Market Assessment (SHMA, 2017) identifies 81% of the housing need is for houses. The SHMA is now considerably out-of-date, especially in light of the COVID-19 pandemic which is influencing homeowners to favour houses with gardens as opposed to flats without.
- 3.9 Within Wymondham, the Promoters have successfully secured consents resulting in excess of 1,000 dwellings being completed in the past 15 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.
- 3.10 We consider the current strategy as drafted is not **justified** and not **effective**. Further it does not recognise the growth to be associated with the Oxford – Cambridge Arc, reflected in a forthcoming Strategic Planning Framework, making the Plan **inconsistent with national policy**. The Plan should be revisited to re-position the Strategic Growth Area with greater focus on this corridor between Cambridge and Norwich where employment growth is likely to be significant. Within that Wymondham should sit high within the settlement hierarchy as the only 'large main town' outside of Norwich, and squarely within this corridor. The additional 5,825 homes (prior to any adjustment due to viability/deliverability of strategic long-standing allocations rolled over from the JCS) we have identified as either being required to accommodate full housing need, or re-distributed to ensure the Plan is effective and justified

should then be focused within this part of the Strategic Growth Area, with Wymondham a key location to accommodate significant additional growth.

4.0 SUITABILITY OF LAND AT NORTH EAST WYMONDHAM

4.1 Detailed review of the suitability of Wymondham and the suitability of the Promoters' land at North East Wymondham is included in the response to the Regulation 18 consultation undertaken in 2021, provided at **Appendix 3**. This chapter does not seek to replicate this information, however in summary:

- The market town of Wymondham is the largest settlement in South Norfolk, classified as a Main Town within the adopted Joint Core Strategy Settlement Hierarchy and is located within the Cambridge Norwich Growth Corridor;
- The town has and continues to successfully deliver and remains a location with a strong demand for further growth, with the Annual Monitoring Report (2018/19) identifying commitments of 1,117 dwellings to be delivered over the following 5-year period (2019/20 – 2023/24), with a further 328 dwellings to be delivered in the remaining Joint Core Strategy plan period and 512 dwellings beyond 2026;
- The Promoters site at North East Wymondham has been identified as a 'reasonable' site by the authorities and has not be dismissed as inappropriate for development;
- The site is a sustainable location for development which can deliver further growth to complement and enhance the existing and committed developments in North East Wymondham, creating a new community heart with a local centre in walking and cycling distance of approximately 1,650 homes alongside delivering a solution to Wymondham's education capacity constraints;
- In the main, the site is located outside the designated Hethersett – Wymondham Strategic Gap, with the exception of an area east of the site identified for a new Country Park;
- An Outline planning application is being prepared to be supported by a full suite of technical and environmental reports (including an Environment Statement) demonstrating the suitability of the site for development. Masterplanning work demonstrates the site is capable of supporting up to 650 new homes including 33% affordable housing (up to 215 affordable homes), a Local Centre, land for a 2-form entry primary school, land for the relocation of Wymondham High's Sixth Form, and significant areas of open space including the creation of a new Country Park.

4.2 In addition to the provision of market and affordable housing (which can be viably delivered at existing policy requirements of 33% provision), the key benefits of the scheme would be the enhancement of the existing new community in North East Wymondham by providing further day-to-day services, through delivery of a Local Centre and primary school, the provision of land for a new Sixth Form site, located off Norwich Common which benefits from

existing bus routes, the new Wymondham Hethersett cycle route and is proposed route of the Bus Rapid Transit service from Wymondham Railway Station to Norwich, and the delivery of 'Kett's Oak Common' a new Country Park located to the east of Wymondham and in an accessible location. The Country Park, provided alongside Public Open Space within the development itself, has the dual purpose of enhancing the seeking of the historic Kett's Oak tree and improving public accessible and recreational opportunities to the countryside, a key policy objective (WYM 9) of the Wymondham Area Action Plan.

- 4.3 The forthcoming application, due to be submitted in Spring 2021, demonstrates the site is wholly suitable for the proposed development, and could meet a significant portion of the 5,825 homes we believe is currently unmet, or unjustified/effective in the emerging GNL. A summary of the environment and technical matters is included in Appendix 3, with a Vision Document included within the appendices.
- 4.4 The site at North East Wymondham is an available and deliverable site which can deliver within the short to medium term.
- 4.5 The Promoters' land has been reviewed by the authorities through various Housing and Economic Land Availability Assessment (HELAA) exercises and through the 'Site Assessment' through the Wymondham Booklet as site GNLP0525AR (forming part of site GNLP0525R).
- 4.6 The HELAA comparison table (Stage 2) included within the Wymondham Booklet confirms the site (GNLP0525R) scores 'Green' or 'Amber' across all matters, with no significant areas of concern. The discussion section at Stage 4 of the Wymondham Booklet confirms the site is well located in terms of schools, public transport and retail opportunities. As such, it is shortlisted as a 'reasonable alternative' for further assessment (Stage 5).
- 4.7 The Detailed Site Assessment undertaken at Stage 6 confirms site GNLP0525R identifies:
- Initial highways advice indicates much of the site would have good access to services and could be acceptable if developed as part of a comprehensive approach to development;
 - There are no known constraints from utilities infrastructure, contamination or ground instability, the land is not currently accessible as public open space;
 - There are several constraints which would affect the possible form of development however the site is large enough to mitigate against these; and
 - The site is considered suitable for the land availability assessment.
- 4.8 Stage 7 (Settlement based appraisal of reasonable alternative sites and identified of preferred sites) confirms there are no 'major constraints' which would preclude development of

GNLP0525R. The site is considered to be a reasonable alternative which could be allocated if additional growth is needed in the Main Towns, including as a contingency site if progressed.

4.9 Further consideration of the Promoters' site specifically (GNLP0525AR) is provided under supplemental Stage 6 confirming:

- The site would be accessible to shops, employment opportunities, public transport and local facilities;
- The site encroaches into the strategic gap however the promoters have recognised this through the proposal for a new country park;
- There are no particular constraints from utilities infrastructure, contamination or ground instability, potential loss of open space or ecological designations; and
- The site is considered as suitable.

4.10 The supplemental Stage 7 notes the Promoters' site, alongside others not proposed for allocations, are considered to be unreasonable for allocation:

Based on revisions to the Part 1 Strategy, a contingency site or sites for 1,000 homes in Wymondham is not being sought... A third site allocation in Wymondham would be in excess of the strategic requirement for new homes as set out in the Part 1 Strategy

4.11 The final conclusions of the Wymondham Booklet conclude a strategic requirement for circa. 150 homes in Wymondham, with it being "considered unacceptable" to significantly exceed this number. No justification is provided for this statement.

4.12 The conclusions further note, due to revisions made to Part 1 strategy the contingency for 1,000 homes in Wymondham is deleted. No justification is provided as to why this is the case, and why other locations which are less sustainable have been identified for further growth instead including those away from the A11 corridor and those outside of the proposed Strategic Growth Area.

4.13 The Review of the Sustainability Appraisal which accompanies these representations has considered Site against the Authorities' Sustainability Appraisal objectives concluding that it should be selected for inclusion based on its location, opportunities and performance these.

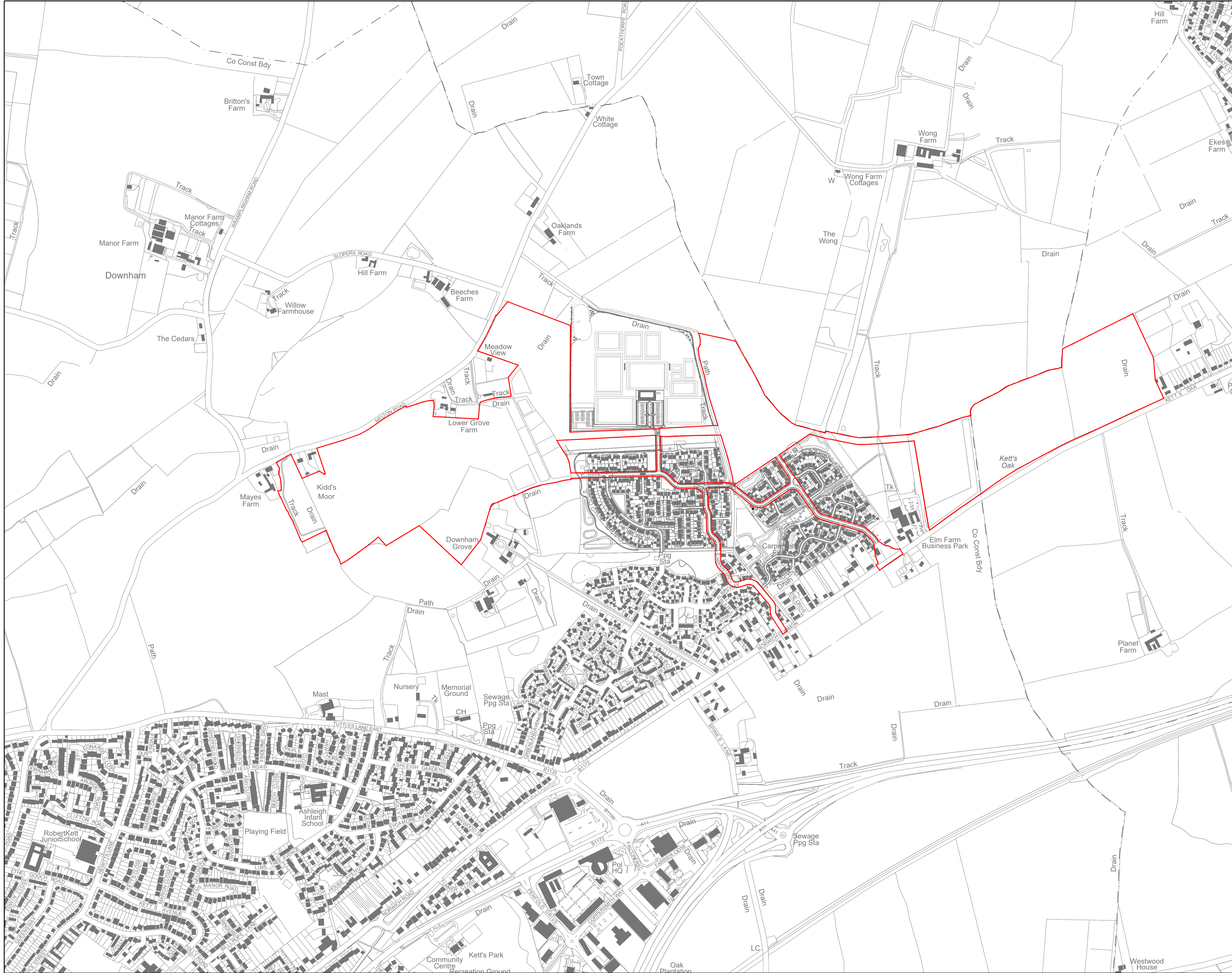
4.14 In addition, the Review notes the Sustainability Appraisal provides no rationale or certainty that all reasonable alternatives in Wymondham (including the Site), beyond identified commitments, have been assessed for development. A comparison between sites in

Wymondham to the sites that have been allocated outside of the Strategic Growth Area concludes those sites do not appear to have been selected on their sustainability credentials.

- 4.15 As detailed throughout these representations, the Authorities' spatial strategy and approach to meeting housing requirements is flawed and does not reflect a **justified** or **effective** strategy, and would not be **consistent with national policy**. We consider the current Plan is unsound on this basis and should seek to focus growth on deliverable sites outside of Norwich on the most sustainable corridor (the A11 Cambridge – Norwich Tech Corridor). The Promoters' site at North East Wymondham is such a location.

APPENDIX 1
SITE LOCATION PLAN

Application Site Boundary
 (59.87Ha / 147.94Ac)



Project
NORTH EAST WYMONDHAM

Drawing Title
Site Boundary Pan

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

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APPENDIX 2

MARCH 2018 CONSULTATION REPS

GREATER NORWICH LOCAL PLAN

REGULATION 18 CONSULTATION

GROWTH OPTIONS

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

March 2018

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

	PAGE NO.
1.0 INTRODUCTION	01
i) National Planning Policy Framework	01
ii) Proposed Amendments to the National Planning Policy Framework	02
iii) Summary of Representations	04
2.0 HOUSING NUMBERS	09
3.0 SPATIAL OPTIONS	12
4.0 THE GROWTH OPTIONS	13
i) The Base Line	13
ii) The Ranking of Locations Outside of the Settlement Hierarchy	13
iii) Option 1 – Concentration Close to Norwich	15
iv) Option 2 – Transport Corridors	16
v) Option 3 – Support the Cambridge Norwich Tech Corridor	17
vi) Option 4 – Dispersal	18
vii) Option 5 – Dispersal plus New Settlement	19
viii) Option 6 – Dispersal plus Urban Growth	19
5.0 SUITABILITY OF WYMONDHAM	28
i) Secondary Education Capacity	29
6.0 SUITABILITY OF LAND AT NORTHEAST WYMONDHAM	31
7.0 CONCLUSION	34

APPENDICES

APPENDIX 1: Illustrative Site Masterplan

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

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

1.0 INTRODUCTION

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

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

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

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

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

i) National Planning Policy Framework

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

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

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

iii) Summary of Representations

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

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

1.20 In summary, our representations demonstrate:

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

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

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

Table 1.1 – GOCD response summary

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

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

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

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

2.0 HOUSING NUMBERS

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

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

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

- 2.2 Yes. Para 4.20 – 4.21 of the GOCD confirms the GNLP will seek to over-allocate by means of a 10% buffer to maximise the potential delivery and ensuring housing is delivered to tackle the housing shortage and support economic growth. The 10% buffer, equating to a total of 3,899 dwellings would include the additional 1,700 dwellings identified to meet the City Deal and results in a remaining additional 2,199 dwellings to be allocated. This takes the total housing requirement to 42,887 and the need to identify 7,200 new allocations.
- 2.3 Section 4 of the GOCD confirms one of the key aims of the GNLP will be to drive economic growth across the plan period by delivering an increase on forecast growth in jobs and productivity. This is a reflection of the aims and aspirations of the Greater Norwich City Deal which covers the GNLP area and is being delivered by the Greater Norwich Growth Board (GNGB).
- 2.4 The City Deal, which was signed into effect by the Government in December 2013, gives Greater Norwich increased freedom to help business grow and create economic growth. As detailed in the City Deal report (December 2013), the deal aims to bring an additional 13,000 jobs and 3,000 homes (above Joint Core Strategy requirements) to the Greater Norwich Area. As detailed in the Central Norfolk Strategic Housing Market Assessment (June 2017) this equates to a total of 45,390 jobs over the plan period. **In this respect, we support Option JT1** as identified in **Question 3**.
- 2.5 This approach will help support delivery to achieve social and economic growth, provided that the distribution of these new allocations is appropriate.

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

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

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

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

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

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

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

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

3.0 SPATIAL OPTIONS

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

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

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

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

4.0 THE GROWTH OPTIONS

i) The Base Line

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

ii) The Ranking of Locations Outside of the Settlement Hierarchy

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

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

Q9) Which alternative or alternatives do you favour

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

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

Table 4.1 – Main Town Distribution (dwellings)

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

iii) Option 1 – Concentration Close to Norwich

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

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

iv) Option 2 – Transport Corridors

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

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

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

v) Option 3 – Support the Cambridge Norwich Tech Corridor

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

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

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

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

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

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

vi) Option 4 – Dispersal

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

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

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

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

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

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

vii) Option 5 – Dispersal plus New Settlement

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

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

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

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

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

viii) Option 6 – Dispersal plus Urban Growth

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

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

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

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

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

Table 4.2 – ‘Hybrid Options’ Proposed Dispersal

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

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

4.50 Furthermore, through the allocation of sufficient growth to Wymondham the GNLP has the potential to resolve the ongoing Secondary Education capacity constraint currently affecting the south-west area (as detailed further in subsequent sections). While identified as an existing constraint by the Interim Sustainability Appraisal under objective SA10, the consultation fails to regard how the alternatives would influence this (either negatively or positively). Currently, any growth attributed to the south-west of the District has the potential to exacerbate this issue, with a risk that a no growth option could be considered if the situation is not suitably dealt with. This would have a fundamental impact on the potential of the GNLP to deliver its full economic and social benefits, with any growth directed away from the Cambridge Norwich Tech Corridor. It is therefore considered that a 'no growth' option within this south-west area is not an appropriate alternative. The education 'issue' therefore must be dealt with through this plan-making process.

4.51 Therefore, the preferred alternative is one which includes a recognition of the importance of the 'Core Area', directs significant growth to the Cambridge Norwich Corridor and allocates sufficient growth in Wymondham to resolve the strategically important issue of Secondary education capacity. This is a reasonable alternative which would help achieve the objectives of the GNLP. To ensure the plan is justified, this reasonable alternative therefore needs to be assessed as part of the Sustainability Appraisal to be undertaken.

4.52 A report, commissioned by Norwich City Council, entitled Norwich Economic Analysis (GVA, June 2017) examines the functional economic geography of Norwich and its growth potential. As acknowledged in para 2.8 of this report, the authority area of Norwich City Council is not an accurate geography in seeking to understand or capture the true economic value or potential created by Norwich. Instead the economic influence of Norwich extends beyond this urban area. Para 2.19 and Figure 6 (taken directly from the SHMA 2016) identify strong labour

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

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

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

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

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

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

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

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

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

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

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

5.0 SUITABILITY OF WYMONDHAM

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

The Strategic Gap

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

Wymondham Abbey and the Historic Landscape Setting of the Town

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

The capacity of Wymondham High School (Academy)

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

- 5.7 The SPCD acknowledges these constraints, as well as the identifying a potential highways capacity issue regarding a bottleneck under the railway line which could further constrain development to the south of the town.
- 5.8 Regardless of these constraints, as the largest settlement in South Norfolk, a key location within the Core Area and Cambridge Norwich Corridor, and a location with high demand for new homes, Wymondham is a location where continued growth should be encouraged and allowed to occur.
- 5.9 The Site, at North East Wymondham, can deliver significant growth in a sustainable and suitable location which has regard to (where necessary) the limited number of identified constraints. This is detailed further in Section 6. It is not located in the Strategic Gap (save an expect an area of proposed Country Park) nor does it affect the setting of the Grade I Wymondham Abbey.

i) Secondary Education Capacity

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

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

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

6.0 SUITABILITY OF LAND AT NORTHEAST WYMONDHAM

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

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

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

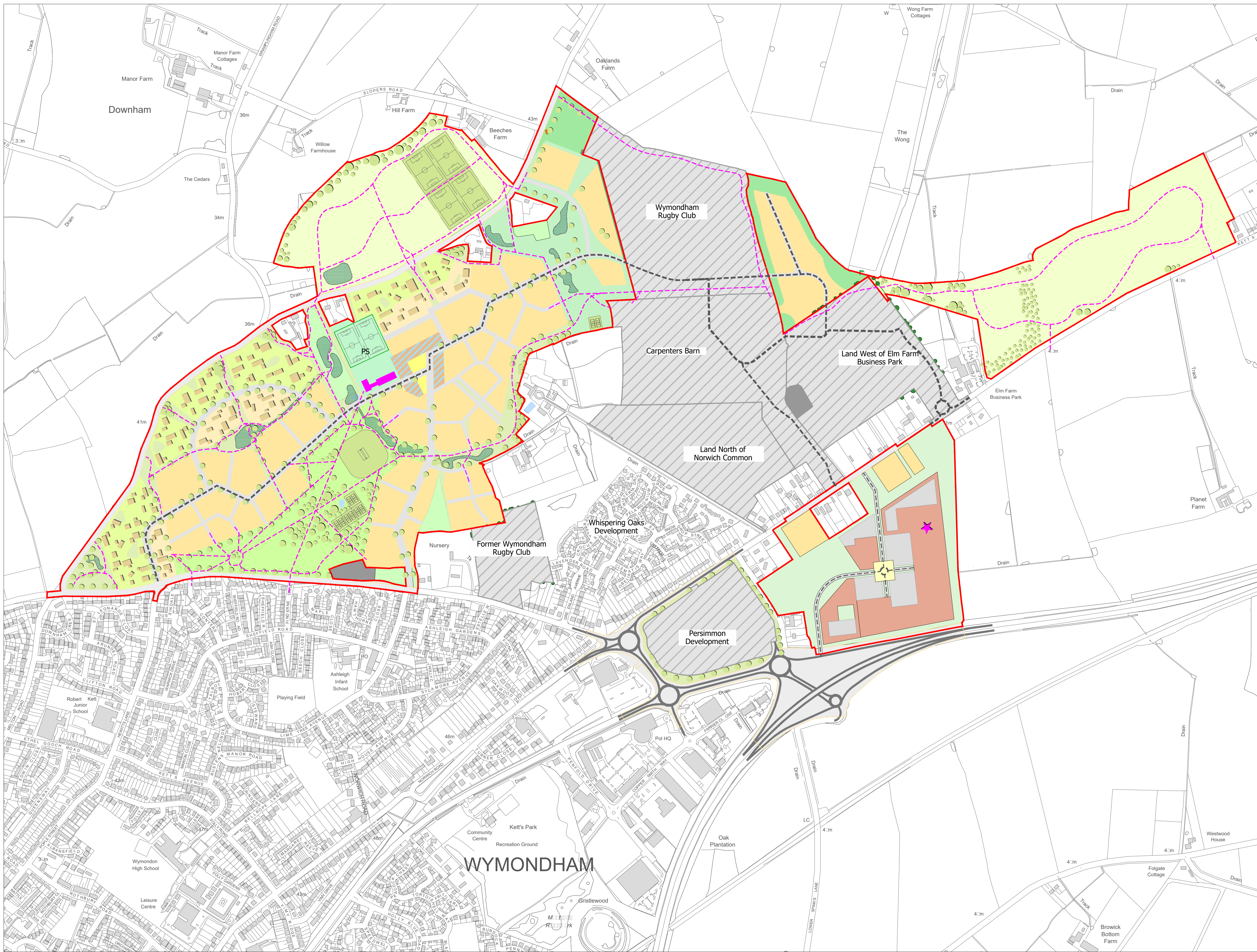
7.0 CONCLUSION

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

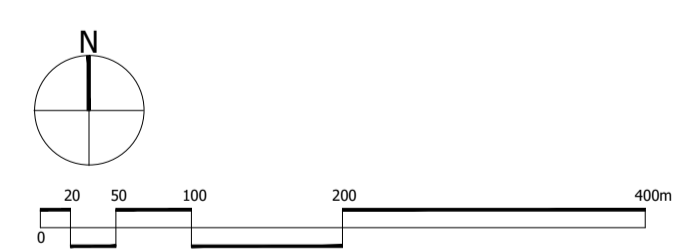
- 7.6 On this basis, we consider a hybrid version of Growth Options 2 and 3 should come forward as a preferred options, serving to ensuring the Core Area is supported with a focus for delivering development along the Cambridge Norwich Tech Corridor (A11). A proposed dispersal is included in Section 4.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

APPENDIX 1

Illustrative Site Masterplan



- Legend**
- Site Boundary (159.70ha □B94.63ac)
 - Development
 - Mid Use Employment
 - Low Density Development Edge □
 - Local Centre
 - Primary School
 - Square
 - Road
 - Strategic Leisure Pedestrian and Cycleways Routes
 - Landscape Buffer □ Open Space
 - Natural Green Space
 - Meadow Land
 - Allotments Orchard
 - Town Park
 - Sports Pitches Courts
 - Existing Uses to be Retained
 - Approved Development Schemes & Schemes Under Construction
 - Existing Landscape to be Retained
 - Proposed Tree Planting
 - Attenuation Ponds
 - Existing Water Bodies
 - ★ Potential Secondary Education Facility
- Graphic not Denoting Layout or Density of Development.



Project
NORTH EAST WYMONDHAM
NORFOLK

Drawing Title
ILLUSTRATIVE MASTER PLAN

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



Planning • Master Planning & Urban Design
 Architecture • Landscape Planning & Design • Project Services
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APPENDIX 2

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

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

Summary

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

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

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

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

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

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

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

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

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

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

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

Introduction

1. The National Planning Policy Framework (NPPF) seeks to boost significantly the supply of housing. To achieve this local authorities are required: to meet the *'full, objectively assessed needs for market and affordable housing in the housing market area'*; and, demonstrate *'a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% ... to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20%'*.
2. The National Planning Practice Guidance¹³ (NPPG) states that requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the 5 year supply and that considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light.
3. The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was adopted in March 2011, with amendments January 2014. It establishes a housing requirement for Greater Norwich to 2026. This housing requirement was to be monitored separately against a core Norwich Policy Area (NPA) and the two residual rural areas of Broadland and South Norfolk. Significant new evidence on housing need, in the form of the Central Norfolk SHMA, was published in January 2016 and updated in July 2017.
4. Since its adoption in 2011, housing delivery in the NPA has not kept pace with the JCS housing requirement nor has it been possible to demonstrate a 5 year housing land supply. The absence of land supply persists despite the delivery of very significant increases in housing land supply commitments (the sum of planning permission and allocations of land). Housing delivery has however significantly exceeded the JCS housing requirements in the residual rural areas of Broadland and South Norfolk and a plentiful land supply continues to be maintained.
5. If measured against the more recent SHMA assessment of OAN there has been a housing delivery surplus in the NPA and the residual rural area of Broadland and there is a plentiful housing land supply. Within the residual rural area of South Norfolk there has been a relatively small housing shortfall and it is not possible to demonstrate a 5 year housing land supply.
6. The following sections of this report set out in more detail the issues that relate to housing land supply across Greater Norwich.
7. The tables 2 to 11 and the housing trajectories and forecasts included as appendices A to D set out the housing land supply position as at 1 April 2017 for the respective parts of the Greater Norwich area based both on the JCS housing requirements and the significant new evidence of housing need as contained in the 2017 Central Norfolk SHMA.
8. Notwithstanding the existence or otherwise of a housing land supply or the fact that housing commitments are at an all-time high, the Greater Norwich Authorities recognise that there is a need for the identification of further housing land above and beyond the existing housing commitments to 2036. The authorities have committed to the joint production of the Greater Norwich Local Plan (GNLP) to plan for these additional needs. Nevertheless, ahead of the adoption of the GNLP the authorities will continue to take a

¹³ Paragraph 30, ID: 3-030-20140306

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

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

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

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

¹⁴ See part JCS Inspector's report para 40.

Housing Shortfall

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

Table 1 Housing Delivery against JCS NPA Requirement

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

Table 2 Housing Delivery against JCS RPA Requirement

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

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

Housing Backlog

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

Sources of Supply

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

Student Accommodation

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

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

Methodology for Calculating Housing Land Supply

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

Persistent Under Delivery

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

Liverpool vs Sedgefield approaches to recovering shortfall

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

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

¹⁶ 2013 JCS Inspector's Report, para 66

36. Subsequent to the publication of the PPG various site specific documents for South Norfolk and Broadland¹⁷ have been examined and found sound based on the Liverpool approach. The Inspector for the South Norfolk Site Specific Allocations noting that 'this is a reasonable, realistic and pragmatic approach, particularly given the reliance on larger strategic sites'¹⁸, similarly the Inspector for the Broadland documents concluded in both reports that 'I find that in this case the Liverpool approach is the most appropriate'¹⁹.
37. There is a strong logic to this approach. Having considered all reasonable alternatives in the plan preparation process it was determined that an approach involving a significant urban extension was the most appropriate option. This growth strategy is built around delivering significant new infrastructure, including the Northern Distributor Road, Long Stratton Bypass, new High School provision in the NE Growth Triangle, new Primary School provision at various locations, Bus Rapid Transit on key corridors, significant Green Infrastructure as well as a range of local enhancements.
38. It is very important that these major growth locations in Broadland and South Norfolk are not undermined by the release of a significant volume of smaller permissions that make little or no direct contribution to, and undermine the efficient and timely delivery of this key infrastructure. This issue is particularly significant in view of the extent of the backlog resulting from the prolonged downturn in the property market since 2008, which coincided with the base year of the JCS, which if the Sedgefield approach were applied could lead to a significant volume of permissions diverting investment away from the sites necessary to deliver the strategy.
39. Moreover, the approach to the application of the Liverpool approach in Greater Norwich is fully consistent with the national ambition to significantly boosting the supply of housing land. Meeting the revised JCS annual housing requirement already results in the need to identify a deliverable supply that is 60% above the baseline JCS housing requirement and doesn't leave a significant proportion of delivery to the last years of the Plan.
40. Therefore it remains appropriate to use the Liverpool methodology to monitor housing land supply where the JCS housing requirement is used as the starting point for the 5-year housing land supply calculation.
41. If the SHMA is used as the starting point for the 5-year housing land supply calculation in the NPA then there is only a housing shortfall, that needs to be recovered, in the SHMA OAN, including City Deals scenario. However, as there is an ample housing land supply across NPA under any SHMA scenario the question of the appropriate method to recover the shortfall is wholly academic.
42. There is also a housing shortfall identified in the South Norfolk RPA if the SHMA is used as the starting point for the 5-year housing land supply calculation. The appropriate method to recover will be considered separately, at this point in time a housing land supply cannot be demonstrated whichever method is used.

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

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

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

Housing Land Supply in the Norwich Policy Area (NPA)

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

Table 3 NPA Housing Land Supply - JCS Based

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

Table 4 NPA Housing Land Supply - SHMA OAN Based

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

8.08	14,091 / 1,745	Supply in Years	14,091 / 1,734	8.13
-------------	-----------------------	------------------------	-----------------------	-------------

Table 5 NPA Housing Land Supply - SHMA OAN, inc. City Deal Uplift Based

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

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

Broadland and South Norfolk Rural Areas

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

Table 6 BDC RPA Housing Land Supply - JCS Based

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

Table 7 BDC RPA - SHMA OAN Based

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

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

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

Table 9 SNDC RPA - JCS Based

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

Table 10 SNDC RPA - SHMA OAN Based

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

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

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

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

March 2018

Appendix A2 – Whole Norwich Policy Area Trajectory

	Completions											Projections								Total Delivered
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26		
Whole NPA, all sites - 2008/09 to 2025/26																				
Past Completions	1,193	923	910	915	882	992	1,143	1,164												
Acutal Completions - Previous Years																				
Acutal Completions - Reporting Year									1,810											
Projected Completions - Current Year									1,923											
Projected Completions - Future Years Existing Sites										2,570	2,746	3,334	3,518	3,101	2,644	2,280	2,668			
Managed delivery target - annual requirement taking account of past/projected completions	1,825	1,862	1,921	1,988	2,065	2,156	2,253	2,354	2,473	2,546	2,624	2,632	2,613	2,468	2,206	1,908	1,540	799		
JCS allocation annualised over 18 years (2008 - 2026)	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825		
	Five Year Supply											14,091	Units							
	JCS Five Year Requirement plus 20% (6 yrs)											15,278	Units	-1,187	Unit Surplus Yrs					
																	4.61	Land Supply		

34,716

32,847

Appendix A3 – Broadland Norwich Policy Area Trajectory

	Completions												Projections										Total Delivered
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26					
Broadland NPA, all sites - 2008/09 to 2025/26																							
13 December 2017 Draft																							
Actual Completions - Previous Years	104	84	81	157	56	217	217	340															
Actual Completions - Reporting Year									410														
Projected Completions - Current Year										463													
Projected Completions - Future Years																							
Existing Sites																							
Managed delivery target - annual requirement taking account of past/projected completions	617	647	682	722	762	817	867	926	984	1,048	1,121	1,201	1,255	1,216	1,112	964	798	559					
JCS allocation annualised over 18 years (2008 - 2026)	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	11,721			

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

Total Required 11,099

Appendix A4 – Norwich Trajectory

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

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

Appendix A5 – South Norfolk Norwich Policy Area Trajectory

	Completions											Projections						Total Delivered	
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25		2025/26
South Norfolk NPA, all sites - 2008/09 to 2025/26 13 December 2017 Draft	562	440	452	478	419	565	674	459											
Past Completions - Actual																			
Completions - Previous Years	562	440	452	478	419	565	674	459											
Actual Completions - Reporting Year									955										
Projected Completions - Current Year										1,032									
Future Completions - Existing Sites											1,104	1,192	1,089	974	1,050	885	755	655	
Managed delivery target - annual requirement taking account of past/projected completions	731	741	760	780	802	831	853	870	911	906	890	859	804	747	690	570	413	71	
JCS allocation annualised over 18 years (2008 - 2026)	731	731	731	731	731	731	731	731	731	731	731	731	731	731	731	731	731	731	13,156

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

APPENDIX 3

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

GREATER NORWICH TECHNICAL REPORT – ECONOMIC GEOGRAPHY

MARCH 2018

GREATER NORWICH
TECHNICAL REPORT – ECONOMIC GEOGRAPHY
March 2018

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CONTENTS

	PAGE NO
1.0 INTRODUCTION	01
2.0 POLICY CONTEXT	02
i) Current National Policy and Guidance	02
ii) Draft Updates to national Policy and Guidance	04
iii) Emerging Greater Norwich Local plan – Regulation 19 Consultation	05
iv) Policy Context – Key Issues	07
3.0 FUNCTIONAL ECONOMIC RELATIONSHIPS	08
i) Central Norfolk SHMA (2015 and 2017)	08
ii) Further Analysis	09
iii) Functional Economic Relationships – Summary	17
4.0 ECONOMIC OUTLOOK	18
i) Jobs Distribution	18
ii) Employment Forecast	19
iii) Further Growth Influences	22
iv) Economic Outlook – Summary	24
5.0 CONCLUSION	25
 APPENDIX 1 – GVA/HACTH, NORWICH ECONOMIC ANALYSIS PART 1, COMMISSIONED BY NORWICH CITY COUNCIL	

1.0 INTRODUCTION

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

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

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

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

2.0 POLICY CONTEXT

i) Current National Policy and Guidance

National Planning Policy Framework, March 2012

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

iii) Emerging Greater Norwich Local Plan – Regulation 18 Consultation

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

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

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

iv) Policy Context – Key Issues

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

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

3.0 FUNCTIONAL ECONOMIC RELATIONSHIPS

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

i) Central Norfolk SHMA (2015 and 2017)

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

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

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

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

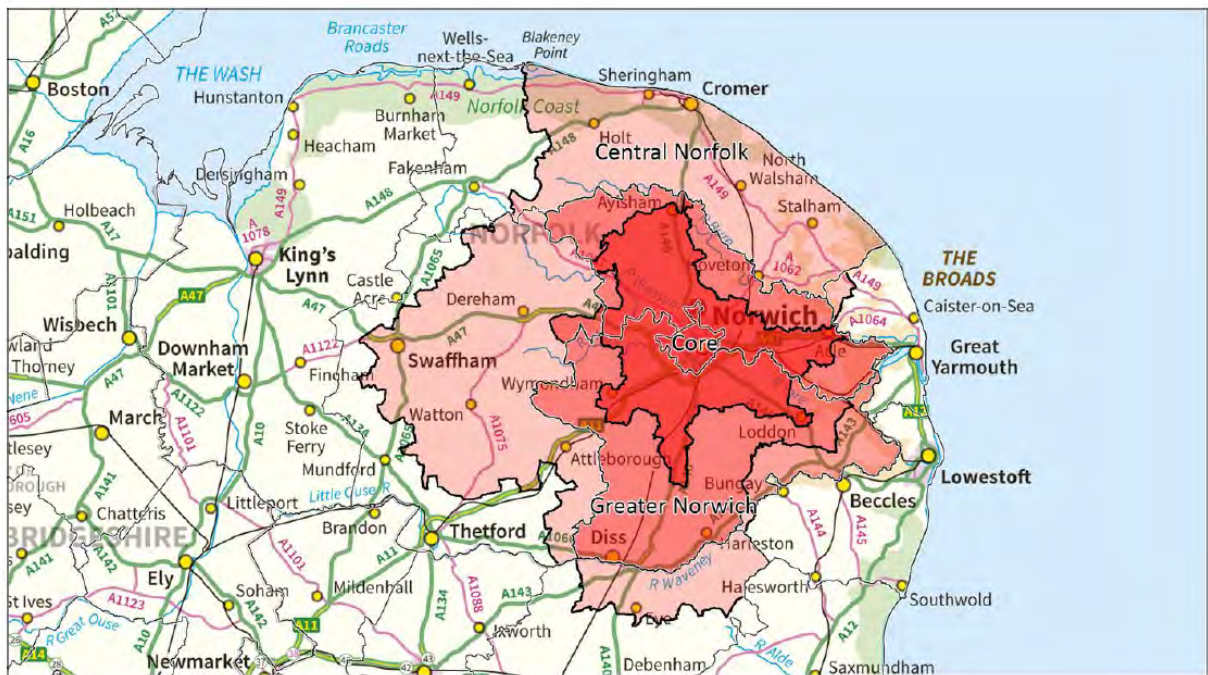
3.5 Ultimately, the SHMA recommends a three 'stage' HMA definition:

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

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

3.6 These HMA definitions are shown on Figure 3.1 below:

Figure 3.1: SHMA HMA Definitions



Source: ORS, Central Norfolk SHMA 2015

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

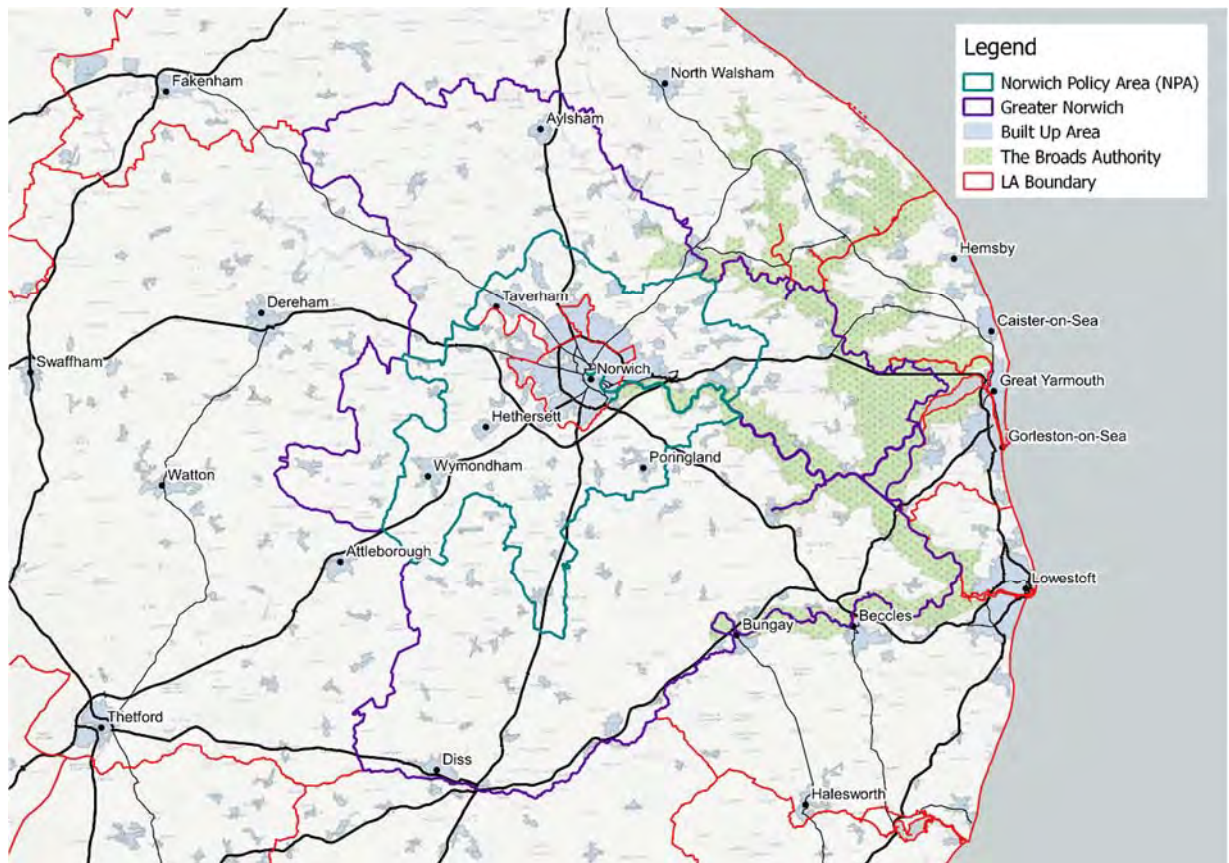
ii) Further Analysis

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

Context

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

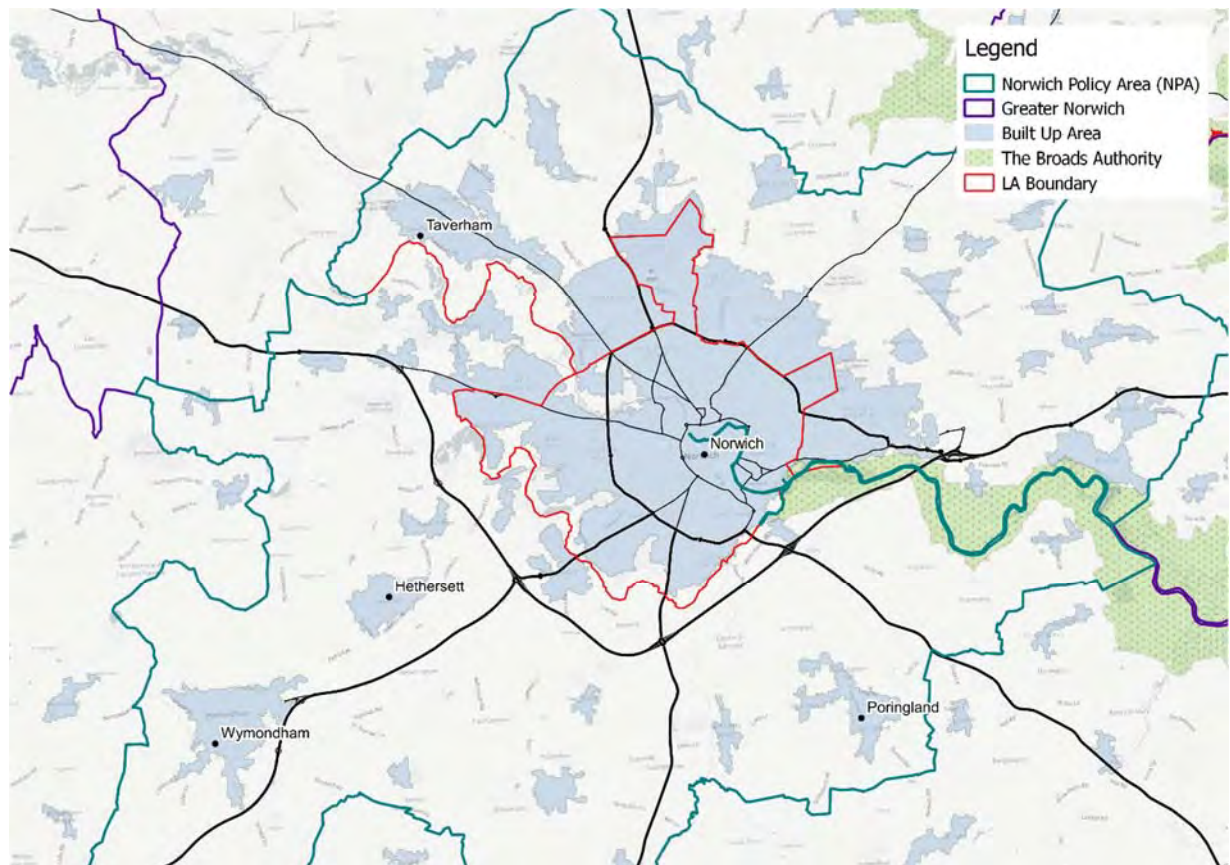
Figure 3.2: Context Plan



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- 3.10 The majority of larger settlements are located within the NPA; Diss and Aylsham are the only other settlements whose built up area populations¹ exceed 5,000 residents. Within the NPA, the largest built up areas outside of Norwich are Taverham and Wymondham, followed by Hethersett and Poringland.
- 3.11 Figure 3.3 below focuses on the Norwich urban area.

¹ Defined using ONS 2011 Built Up Area definitions

Figure 3.3: Context Plan – Norwich Urban Area

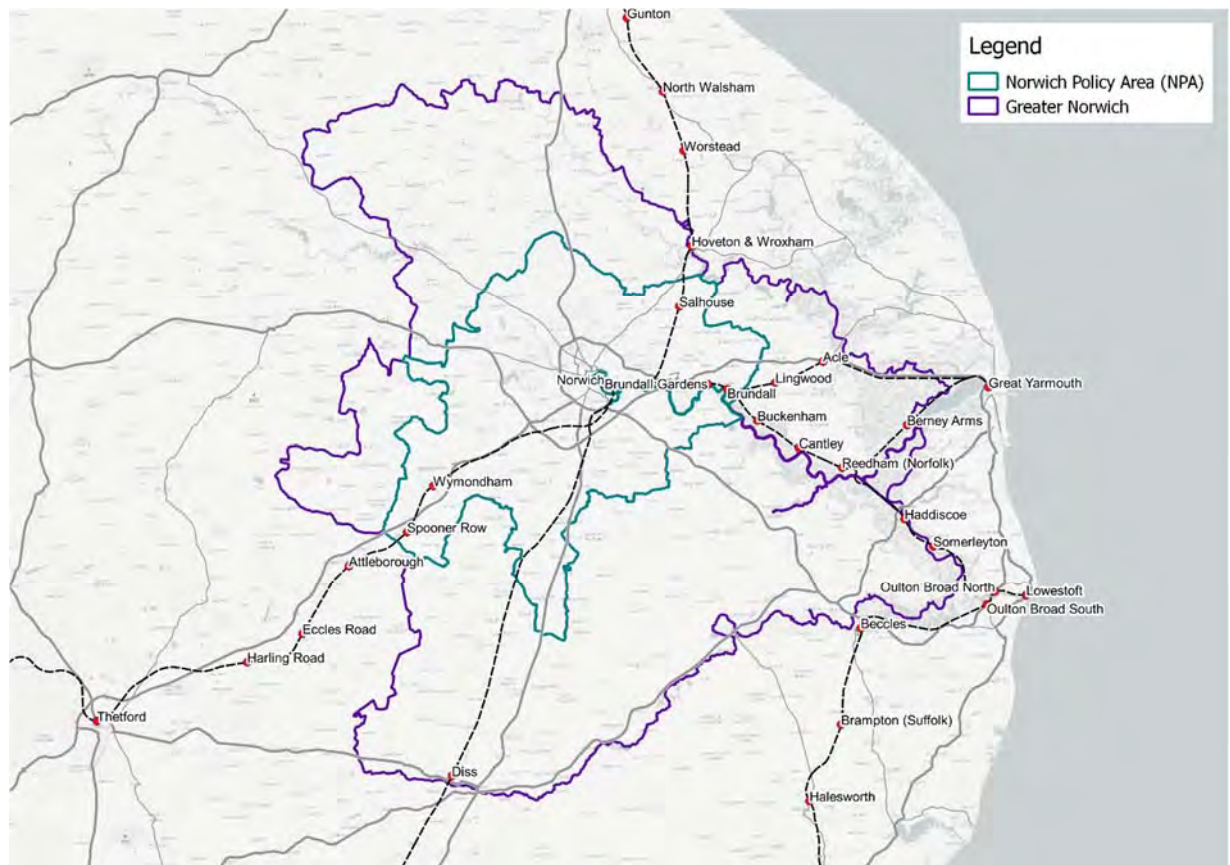
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- 3.12 From Figure 3.3 it is clear that the existing administrative boundary of Norwich City does not reflect the full extent of the city, resulting in large parts of the contiguous urban area falling within Broadland and South Norfolk. This is particularly apparent to the north of the city. One third of Norwich's urban area² (19 sq. km) falls outside of the City Council boundary (primarily in Broadland), accounting for 28% of the Built Up Area's population.

Travel to Work Flows

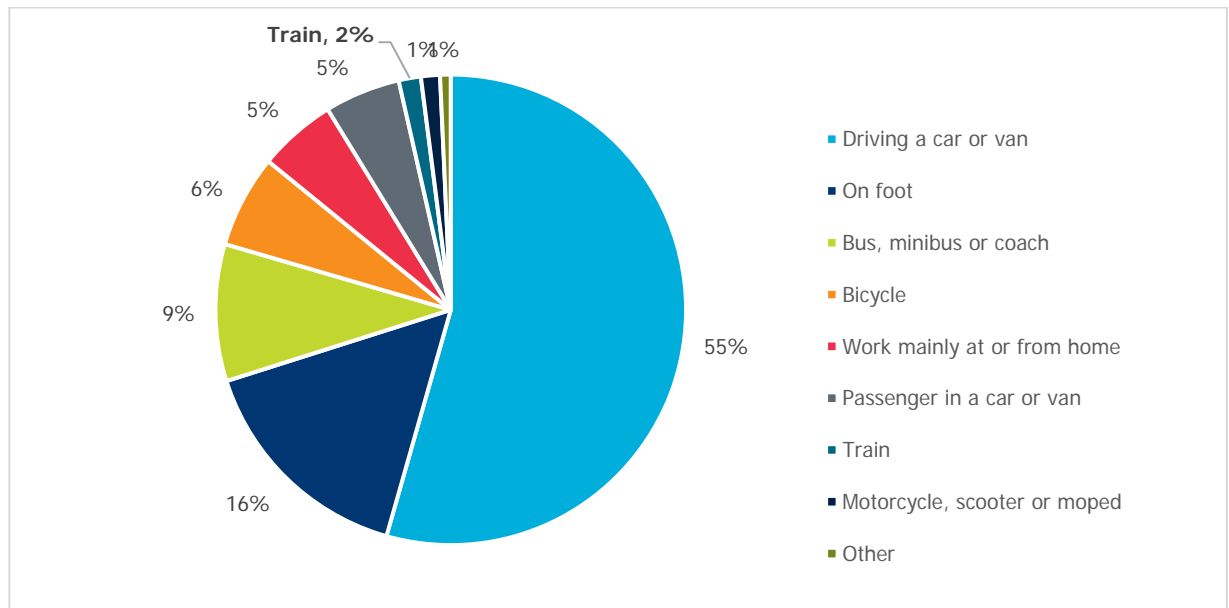
- 3.13 As highlighted in Section 2, spatial planning strategies should promote development in sustainable locations where travel times to employment, education and other services are minimised. Public transport use should also be encouraged. Figure 3.4 below shows the existing rail corridors within the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

² Based on the ONS 2011 Built Up Area Sub-division definition for Norwich

Figure 3.4: Rail Connections

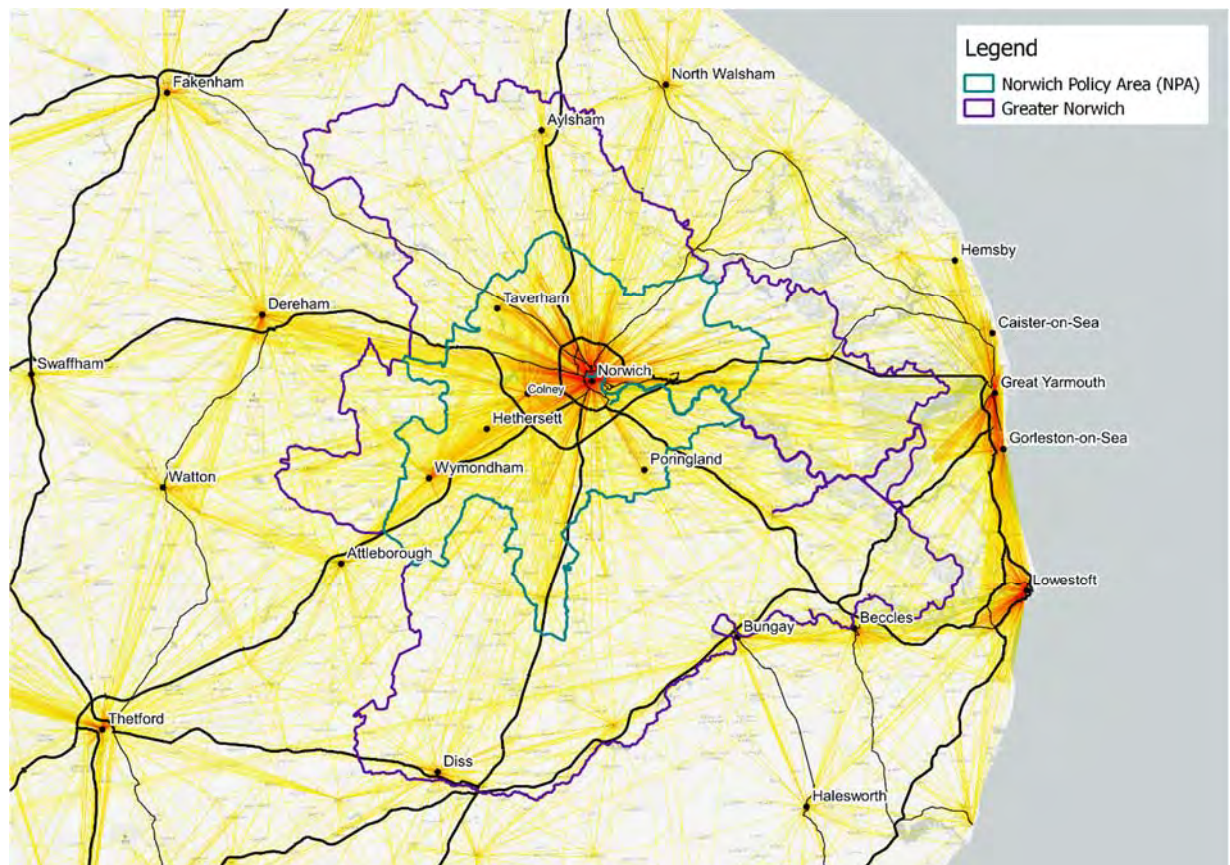
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- 3.14 Norwich serves as a hub for several lines, and benefits from direct links to London and other major destinations in the East of England and beyond. Though there are many stations along the rural lines to the north and east of Norwich, there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

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

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

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

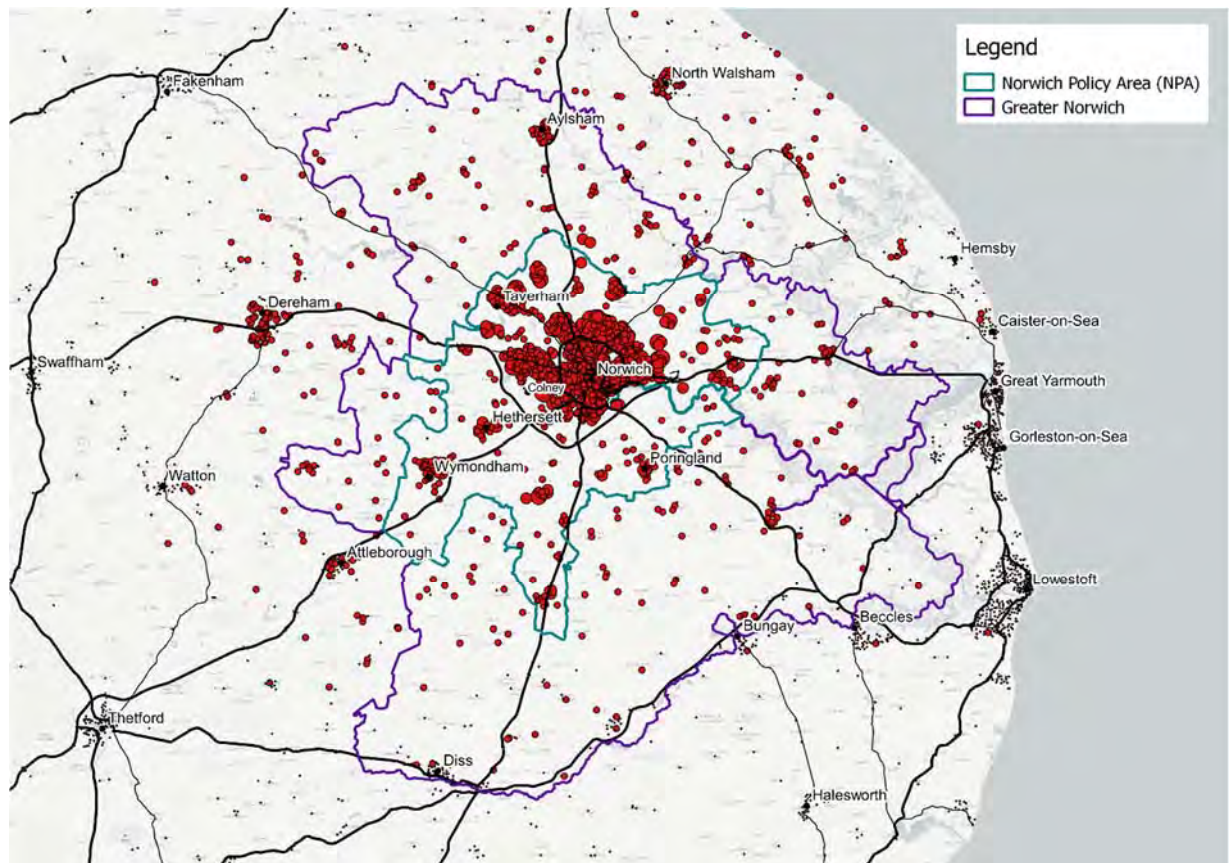
Figure 3.6: Travel to Work Flows

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Source: ONS, Census 2011

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

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

Figure 3.7: Origins of Norwich workers

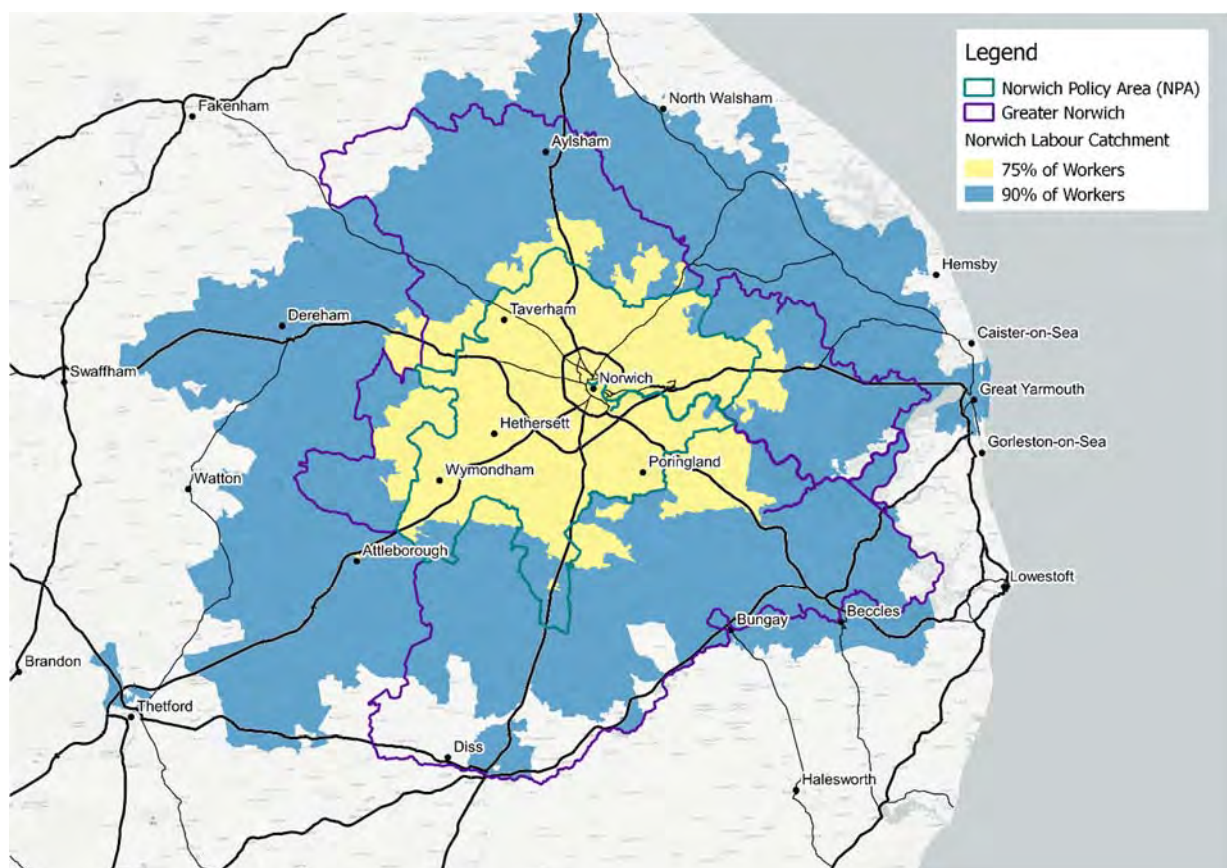


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Source: ONS, Census 2011

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

- 3.25 For each flow originating from an 'output area' (a small unit of geography devised by the ONS statistical purposes) within 90 minutes' drive of Norwich³, the drive time into central Norwich has been calculated. This provides an indication of accessibility, taking into account factors such as availability and quality of infrastructure (i.e. the road network) and physical geography such as rivers, valleys and hills which affect route layout.
- 3.26 Travel to work flows are then ranked, from shortest to longest journey time. Containment thresholds 75% and 90% are then applied to create a 'catchment area' for Norwich's labour force. The 75% catchment area is equivalent to the containment rate of a TTWA (as discussed above). Beyond 90%, flows become more widely dispersed and of less practical use in defining the extent of Norwich's labour market. Figure 3.8 below shows the extend of these zones.

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



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Source: Experian, Off-Peak Drive Time model

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

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

iii) Functional Economic Relationships - Summary

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

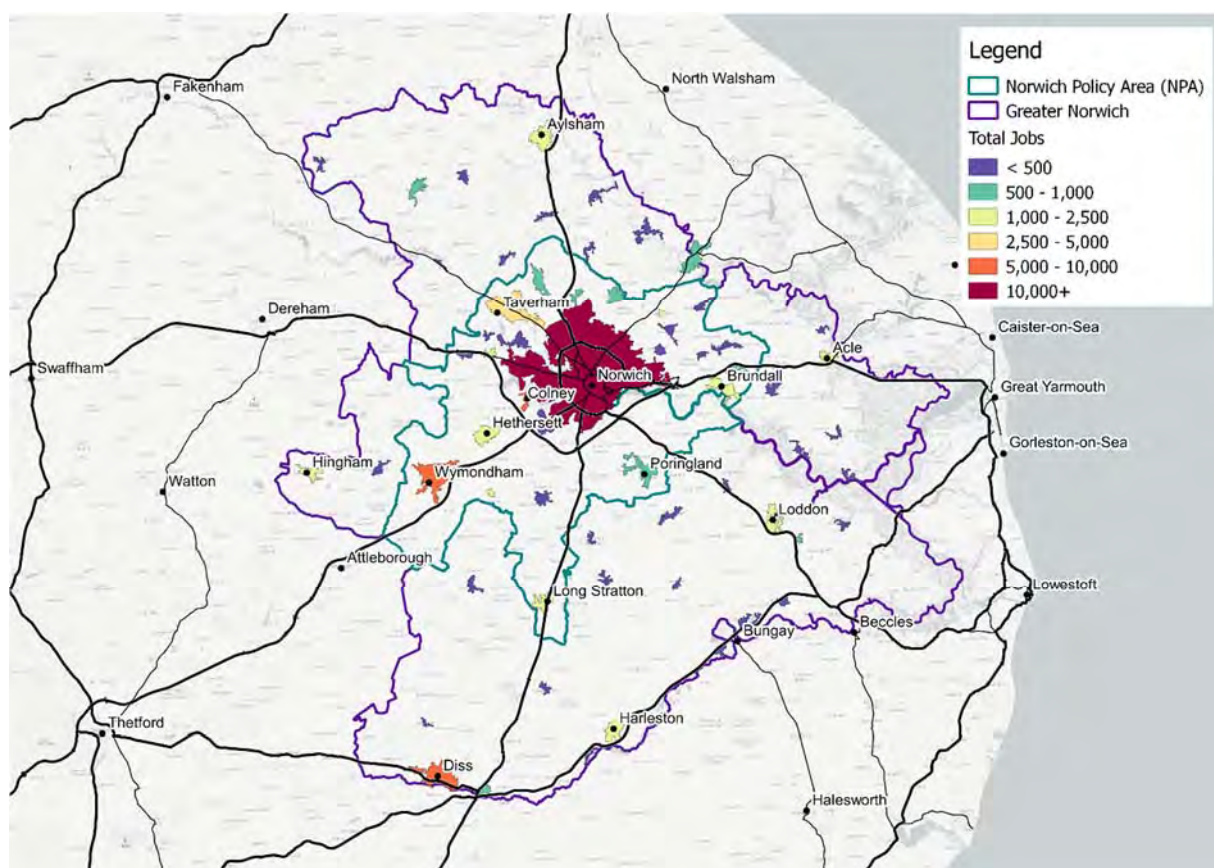
4.0 ECONOMIC OUTLOOK

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

i) Jobs Distribution

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

Figure 4.1: Current Distribution of Jobs



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Source: ONS, Census 2011 (Workplace Data)

4.3 At present, the areas⁴ with the most jobs are in and around the Norwich urban area. This includes areas such as Colney (to the south west of the city, where Norwich Research Park and Norfolk and Norwich Hospital are located). Beyond Norwich and its immediate fringe, the settlements with the largest numbers of jobs are Wymondham and Diss, followed by Taverham.

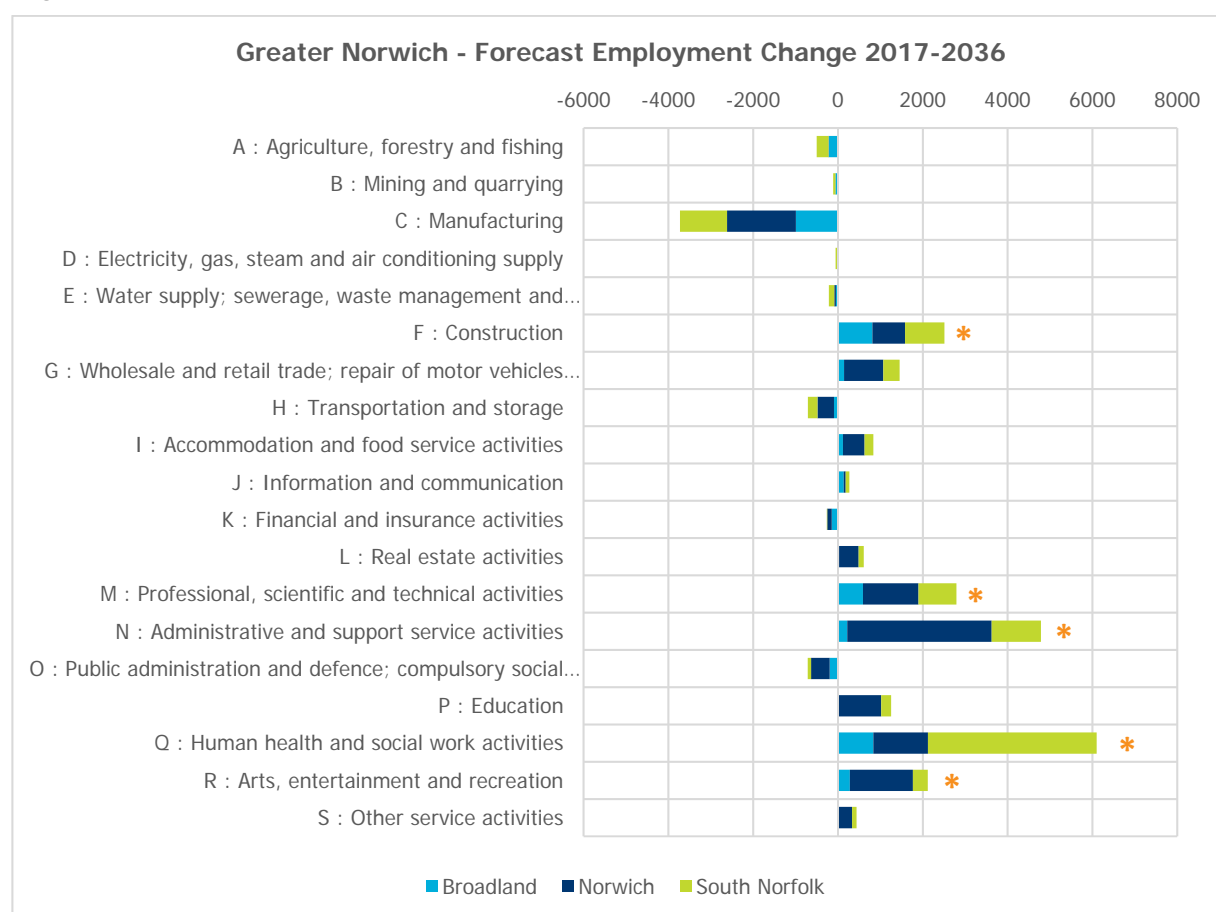
⁴ Built Up Areas and Built Up Area Subdivisions, as defined by the ONS

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

ii) Employment Forecast

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

Figure 4.2: Economic Outlook



Source: Oxford Economics

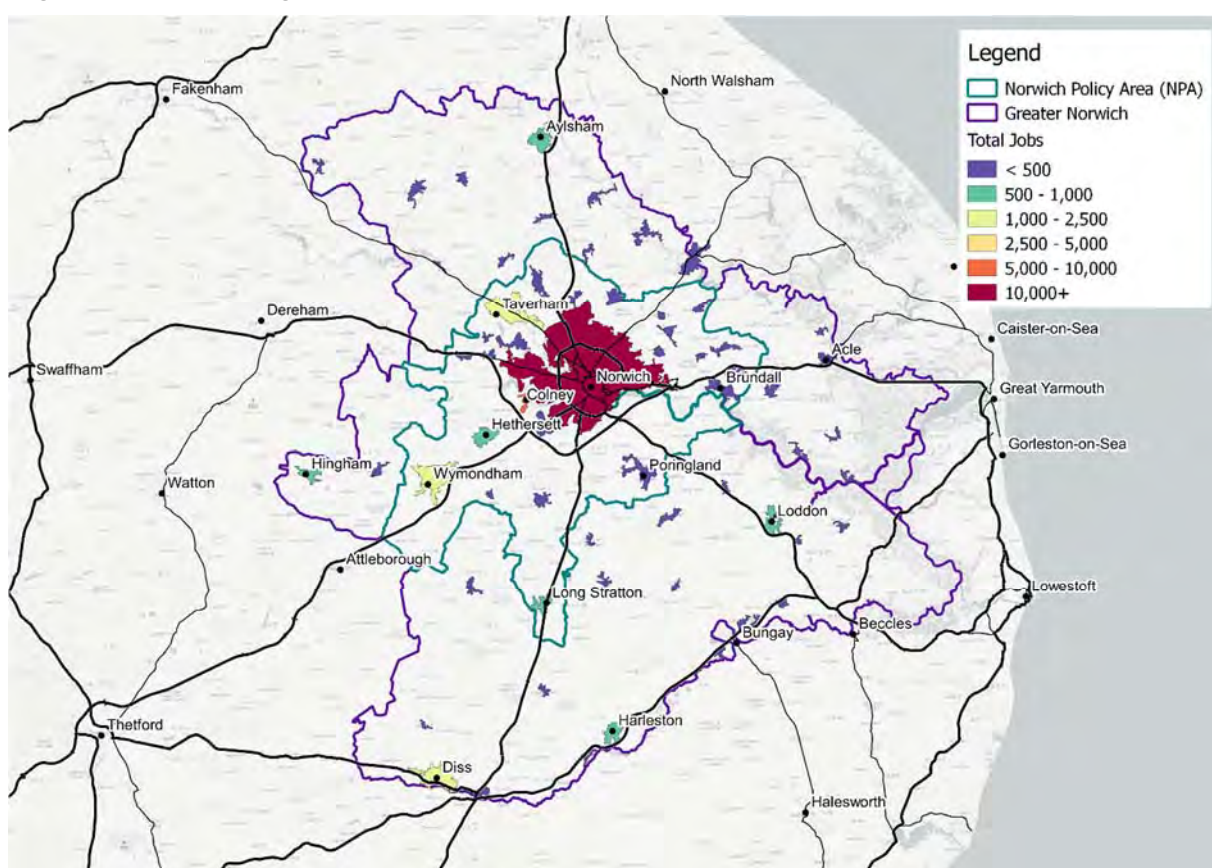
4.5 At the aggregate level, Oxford Economics forecast net growth in employment of c.17,000 over the course of the plan period, including net losses in a number of sectors (most notably Manufacturing – a national trend). The vast majority of jobs are expected to be created in Norwich and South Norfolk,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

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

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

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

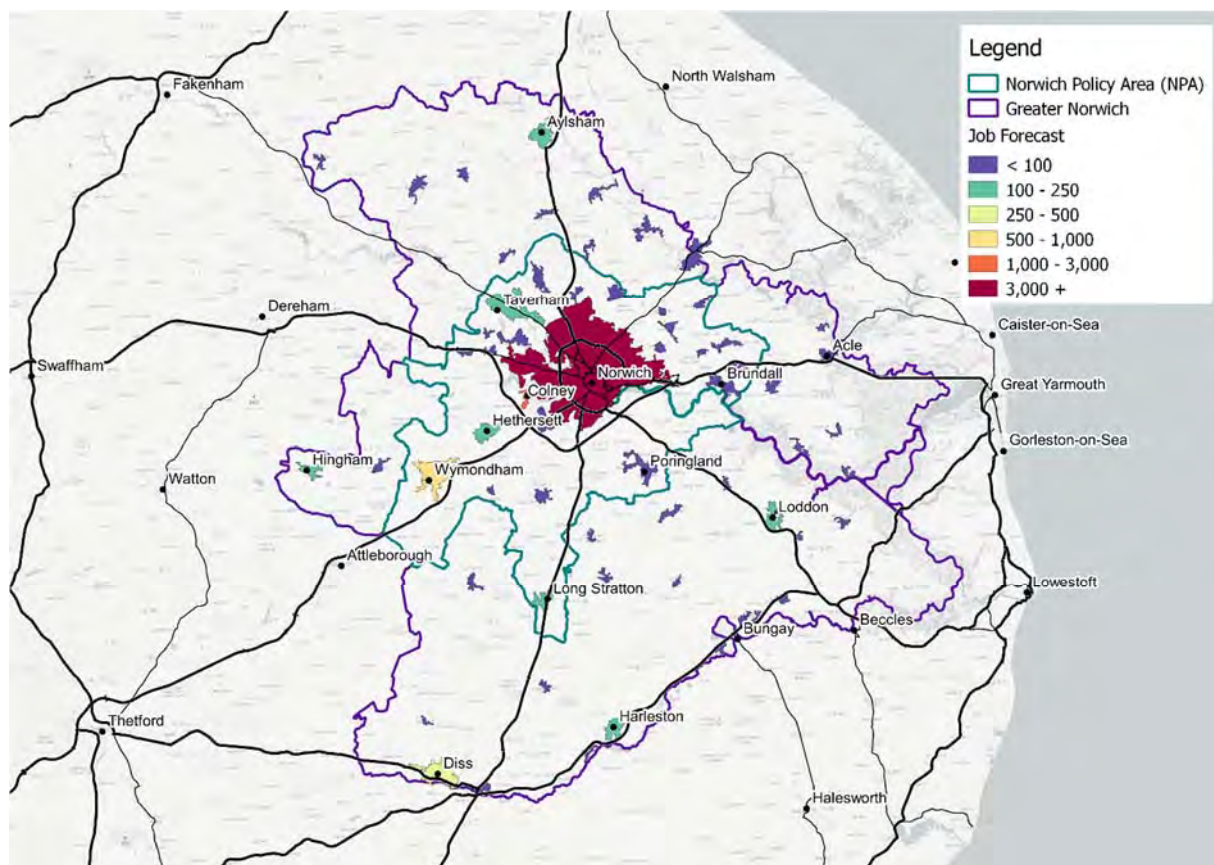
Figure 4.3: Existing Concentrations of Main Growth Sectors



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Source: ONS, Census 2011 (Workplace Data)

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

Figure 4.4: Forecast Distribution of Main Growth Sectors



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

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

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

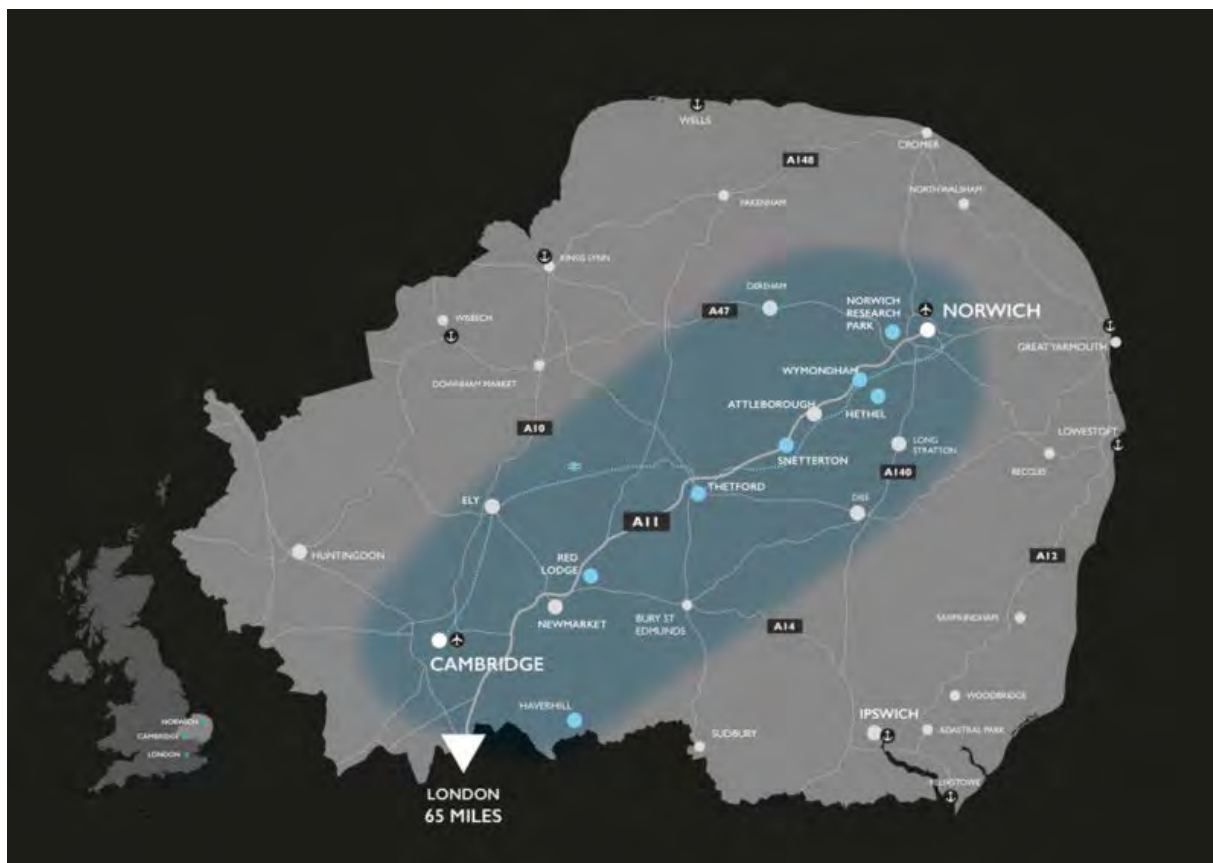
Built Up Area	Total Jobs (All Sectors)	Current Jobs (5 Growth Sectors)	Forecast Job Growth (5 Growth Sectors)
Norwich	114,200	37,100	9,750
Colney	8,700	7,950	2,700
Wymondham	7,200	2,400	700
Diss	5,300	1,650	450
Taverham	3,150	1,500	200
Aylsham	2,350	1,000	150
Long Stratton	2,250	800	250
Hingham	1,100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

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

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

iii) Further Growth Influences

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

Figure 4.5: Extent of the Cambridge Norwich Tech Corridor

Source: Cambridge Norwich Tech Corridor Partnership

- 4.14 In order to achieve this, the initiative aims to facilitate investment in strategic infrastructure (including an upgrade to the Ely North railway junction, which could result in a more frequent rail service along the corridor) and the delivery of 20,000 new homes.
- 4.15 A report in 2015 by Bruton Knowles and AMION Consulting identified that the corridor could create up to 8,700 net additional jobs in high value sectors (in alignment with the New Anglia LEP's economic development objectives), alongside an estimated 5,320 person years of temporary construction employment. This would deliver £558 million net additional Gross Value Added per annum and attract £905 million private sector investment in construction.
- 4.16 More recently, the CNTC initiative has predicted that its plans could create nearly 24,000 jobs⁵ in digital/tech sectors along the route, taking full advantage of its links to one of the World's top universities (Cambridge) and the very high qualification levels of residents (52% being university graduates). Within the GNLp area, the Tech Corridor initiative highlights Norwich Research Park, Browick Road (Wymondham) and Hethel Technology Park as key locations for potential development.

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

4.17 In addition to the Tech Corridor, the GNL area also benefits from the Greater Norwich City deal, which supports the delivery of an estimated 19,000 jobs, including 3,000 high value jobs at the Norwich Research Park⁶.

iv) Economic Outlook – Summary

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

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

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

5.0 CONCLUSION

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

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

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

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

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

APPENDIX 1

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

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Norwich Economic Analysis

Part 1: Norwich Economic Geography

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

June 2017

Contents

1.	Introduction.....	2
2.	Geographies and Context	2
3.	Market Review.....	17
4.	Growth Drivers	23
5.	Conclusions.....	44

Prepared By: Martyn Saunders, Richa Joshi and Zak Vallender

Status: Version 1

Draft Date: June 2017

For and on behalf of GVA Grimley Limited

1. Introduction

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

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

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

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

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

2. Geographies and Context

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

Figure 1: Norwich Location and Strategic Connections



Key

-  Main Roads
-  Motorways
-  Rail Links

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

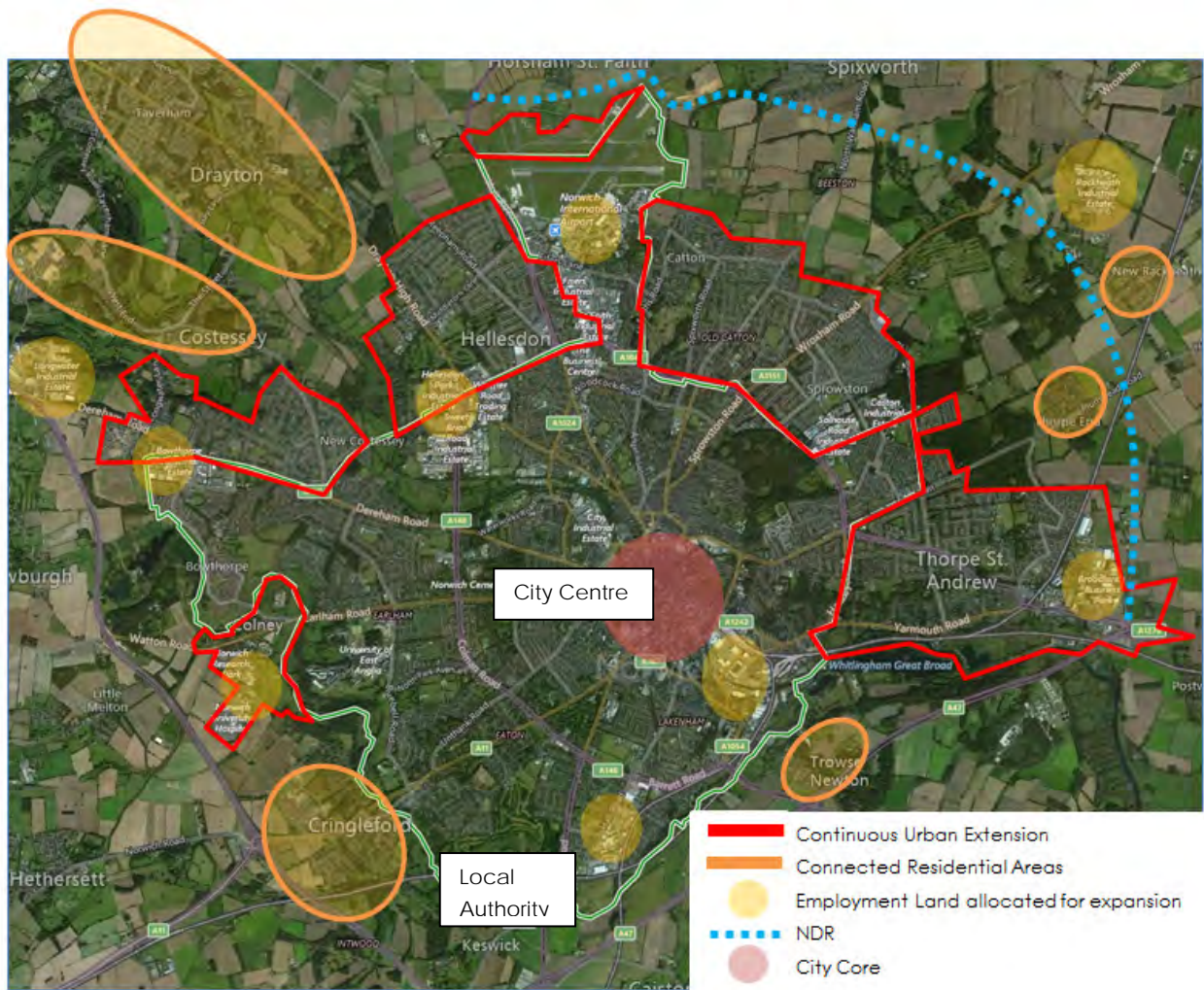
September 2009

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

Norwich City centre, Local Authority Boundary and Beyond

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

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



Source: Bing, 2017.

Norwich Policy Area

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

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

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

Figure 3: Norwich Policy Area

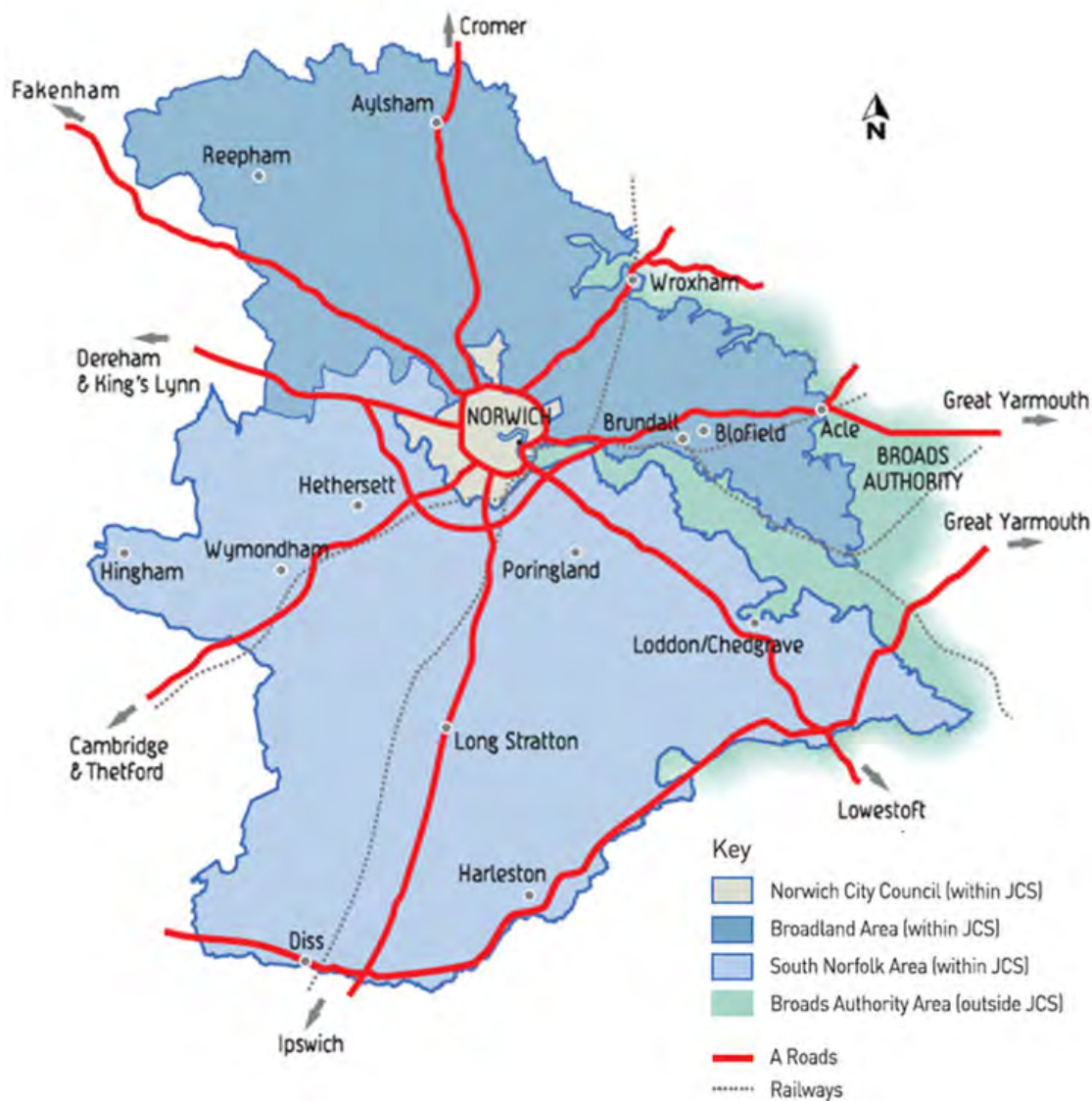


Source: Norwich City

Greater Norwich

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

Figure 4: Joint Core Strategy Area



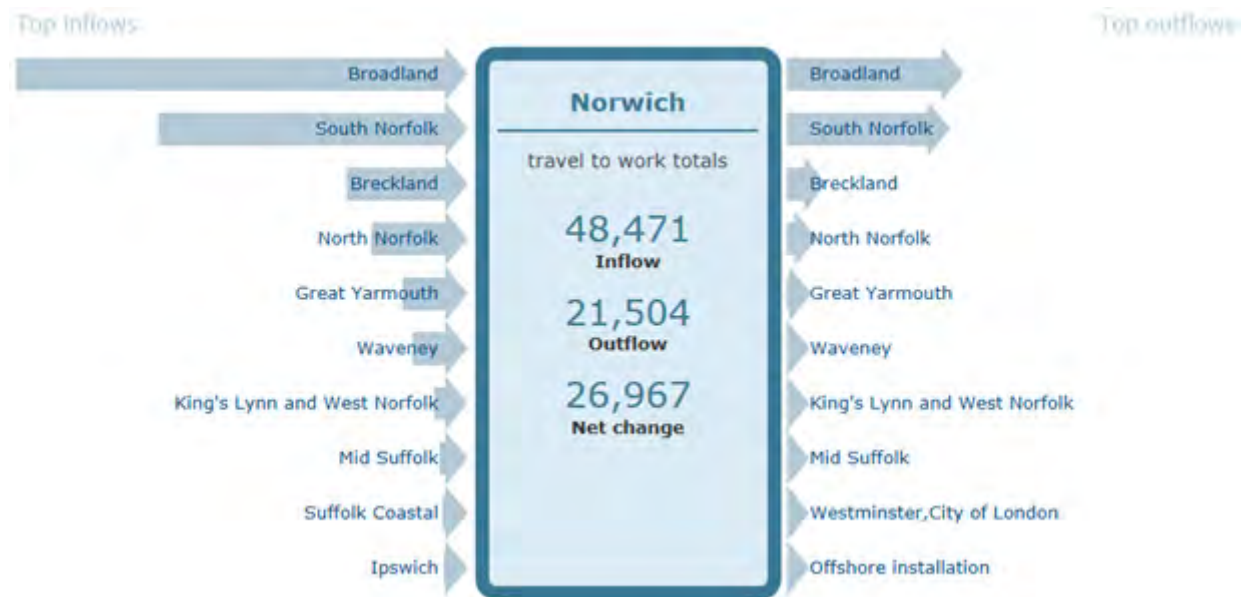
Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

Norwich Travel to Work Areas

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

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

Figure 5: Norwich Travel to Work Flows

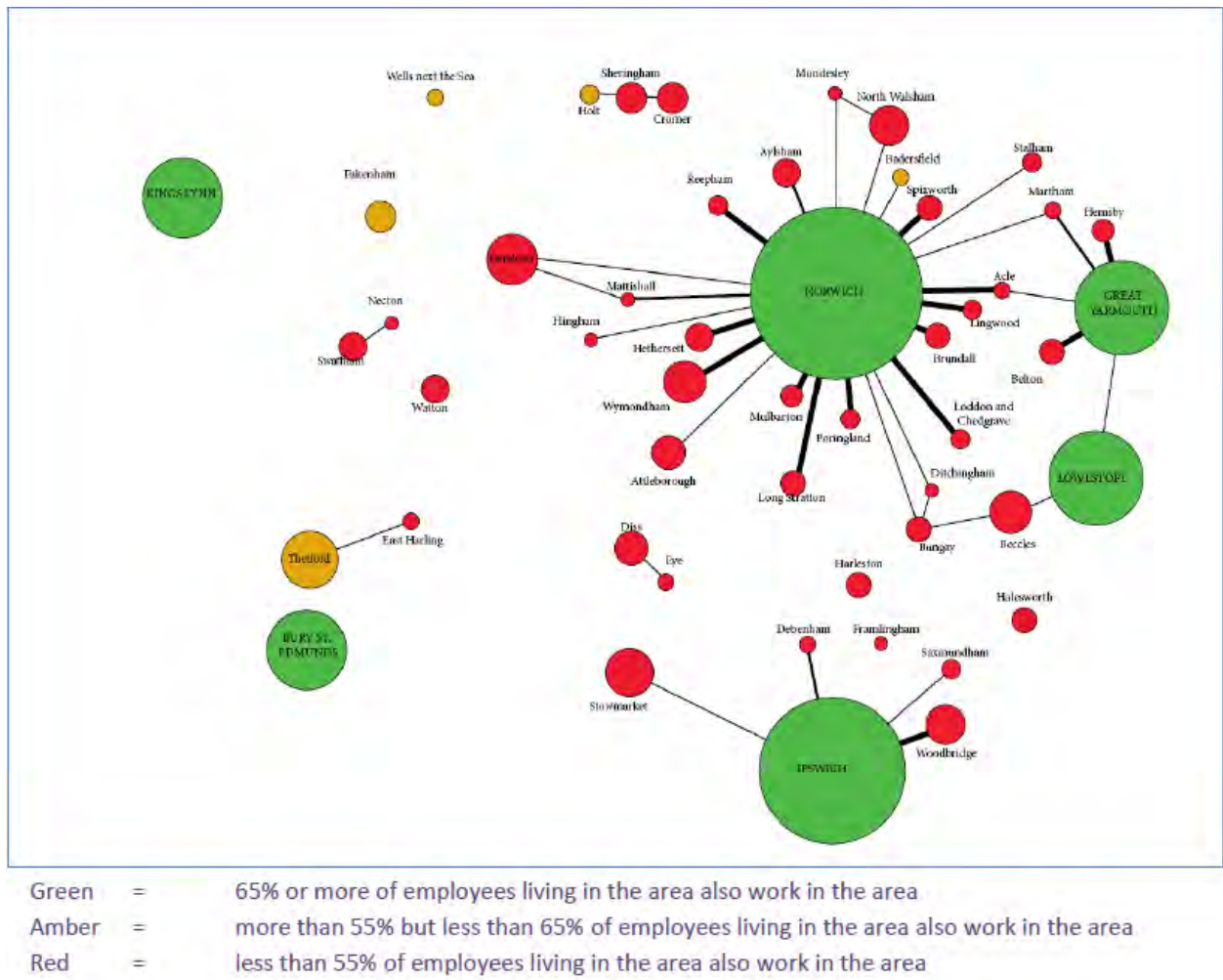


Source: Census, 2011

- 2.17 Figure 6 shows functional relationships based on 2001 origin-destination data (2011 data is currently safeguarded for small areas). Drawn from the 2016 Central Norfolk SHMA, the size of the urban centres (the coloured circle) is proportional to the number of workers who live within the area. The more workers, the larger the circle; hence Norwich is the largest circle.
- 2.18 The links that exist between the urban centres are also illustrated by the joining lines, with stronger links having heavier lines. The thickness of the line does not simply represent the number of workers, but it is based on a 'score' that is based on the strength of the connection when taking into account the number and the proportion of the resident and workplace populations in both areas.
- 2.19 The figure shows that Norwich has strong labour connections with 11 proximate settlements¹ and functions as part of a wide and partially interconnected network. Norwich is the prime employer in the Central Norfolk study area and provides jobs for an extensive catchment that includes settlements across Greater Norwich and outside it.

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

Figure 6: 2001 small area functional relationships



Source: Central Norfolk Strategic Housing Market Assessment, 2016

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

Figure 7: Norwich Travel to Work Area



Source: Norwich Local Economic Assessment, 2015

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

Norwich Broad Rental Market Area and Housing Market Area

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

Figure 8: Central Norfolk and Norwich Broad Rental Market Area

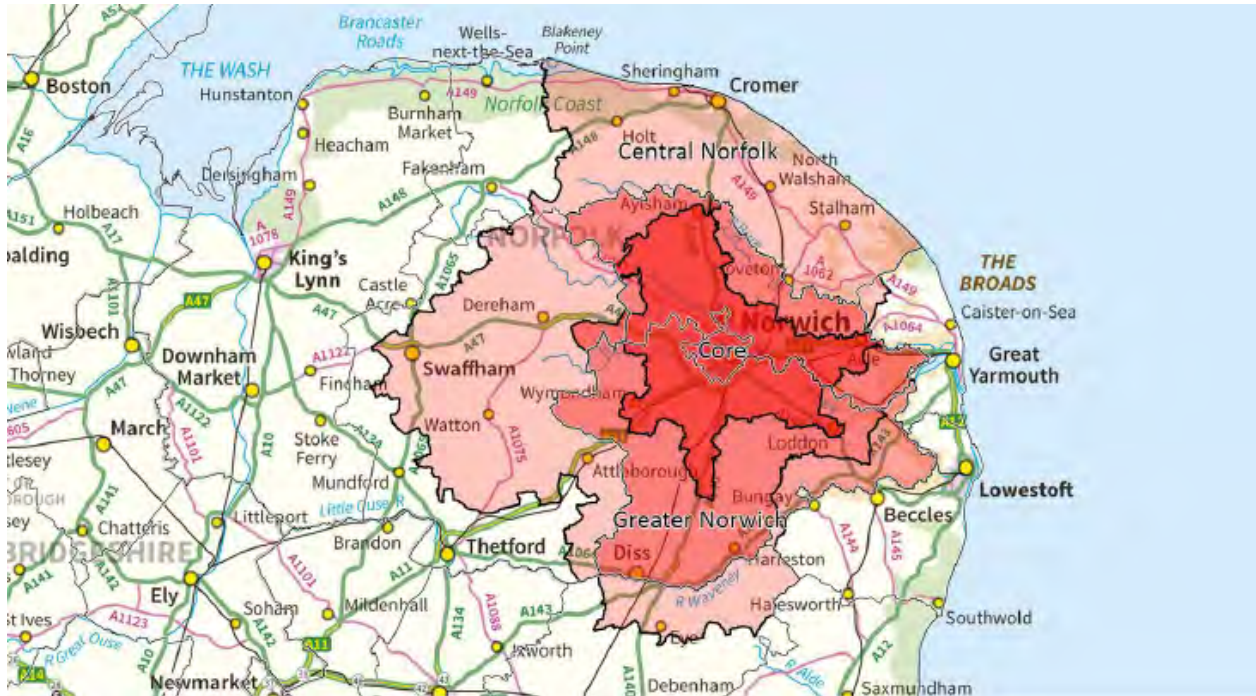


Source: Norwich Local Economic Assessment, 2015

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

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

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



Source: Central Norfolk Strategic Housing Market Assessment, 2016

Section Summary/Findings

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

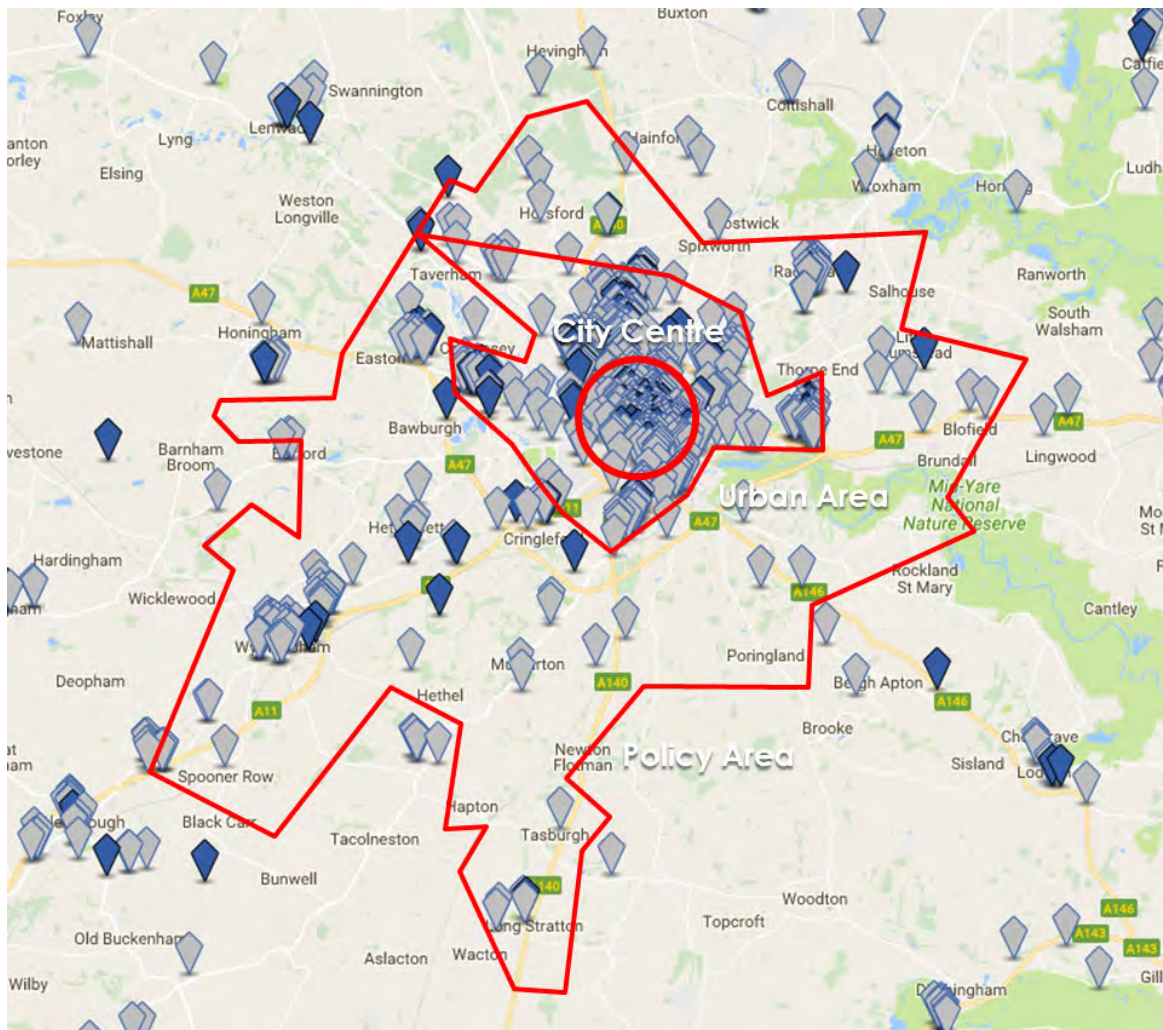
neighbouring centres and HMA shows, Norwich is most strongly connected to settlements and development sites within this area. Unlike the local authority and Greater Norwich areas, the NPA is therefore shown to be of an agreeable size that enables detailed and commensurate analysis. Moreover, the NPA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

3. Market Review

Commercial Market

- 3.1 This section provides a review of the property geographies within the NPA reference geography as designated within the previous section. To undertake the analysis we have compared NPA with the city centre and “urban area” as shown in Figure 10. It reviews total quantum, vacancy levels, rents, and net absorption as a measure of market activity. An extensive baseline analysis is available for the Norwich local authority area and neighbouring local authorities as part of the Greater Norwich Employment, Town Centres and Retail Study.
- 3.2 Figure 10 shows that the majority of commercial buildings are concentrated in the Norwich urban area with heightened concentration in the city centre. Outside of the urban area, commercial buildings are primarily located in key business and industrial sites which are reviewed in the following growth drivers section.

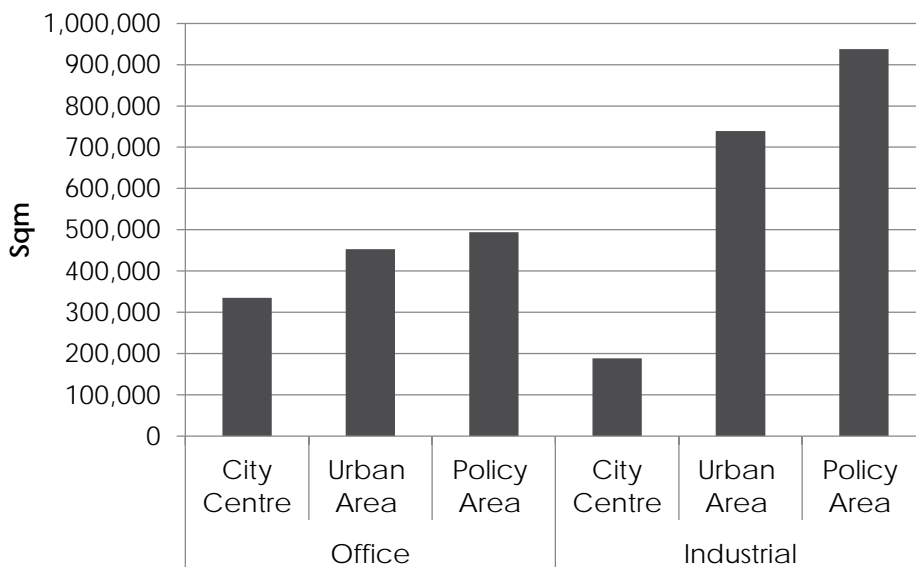
Figure 10: Commercial Properties within Norwich Policy Area



Source: Costar, 2017

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

Figure 11: Existing Floorspace



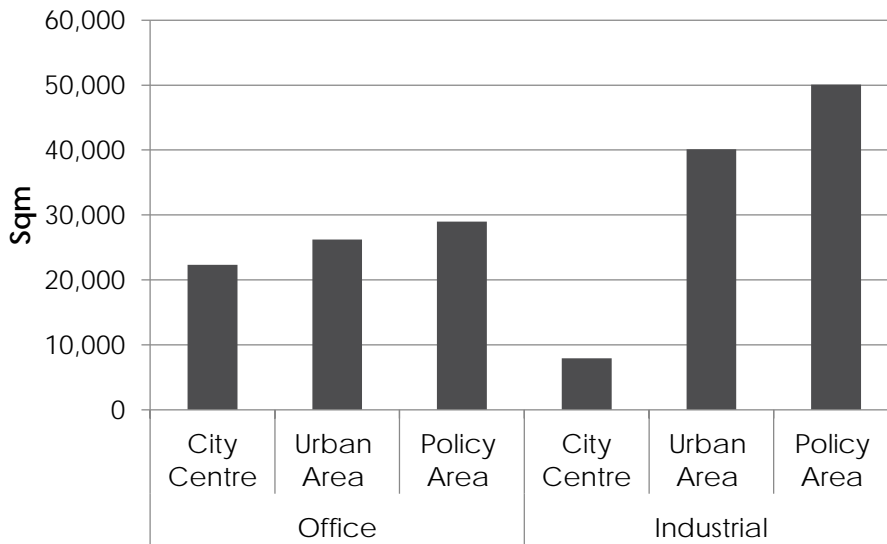
Source: Costar, 2017

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

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

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

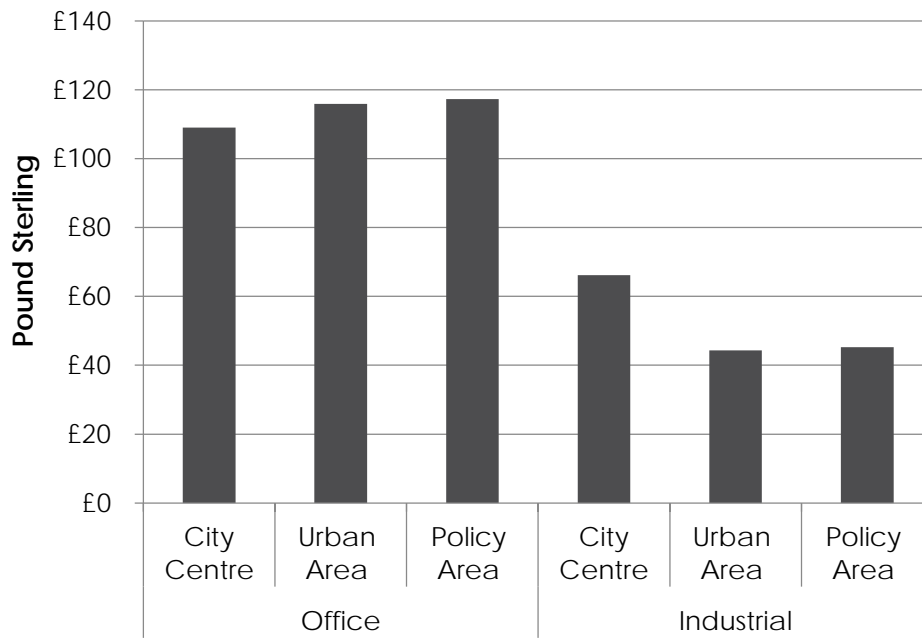
Figure 12: Vacant Floorspace



Source: Costar, 2017

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

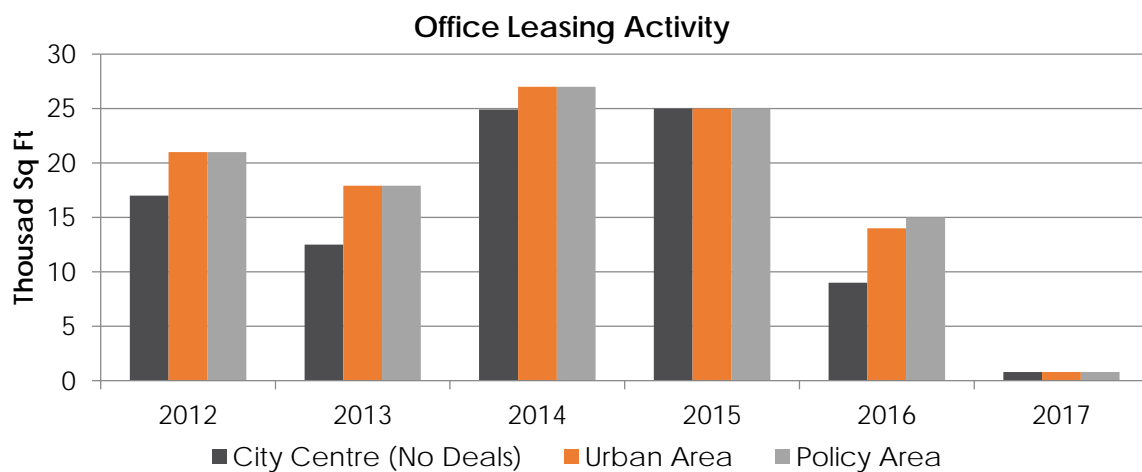
Figure 13: Rents per sqm



Source: Costar, 2017

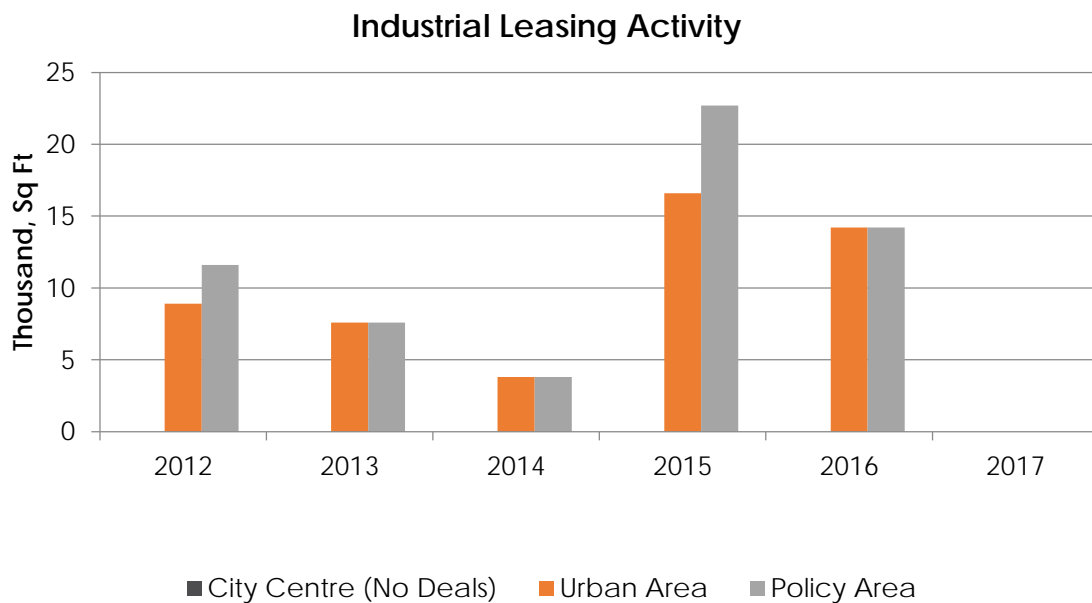
3.8 **Leasing Activity:** Figure 14 and Figure 15 shows leasing activity trends in Norwich for both office and industrial market. Leasing within the office market has fluctuated in recent years with a significant fall in 2016 across the three geographies. This fall may not necessarily be representation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

Figure 14: Office Leasing Trends by Year



Source: Costar, 2017

Figure 15: Industrial leasing Activity by Year



Source: Costar, 2017

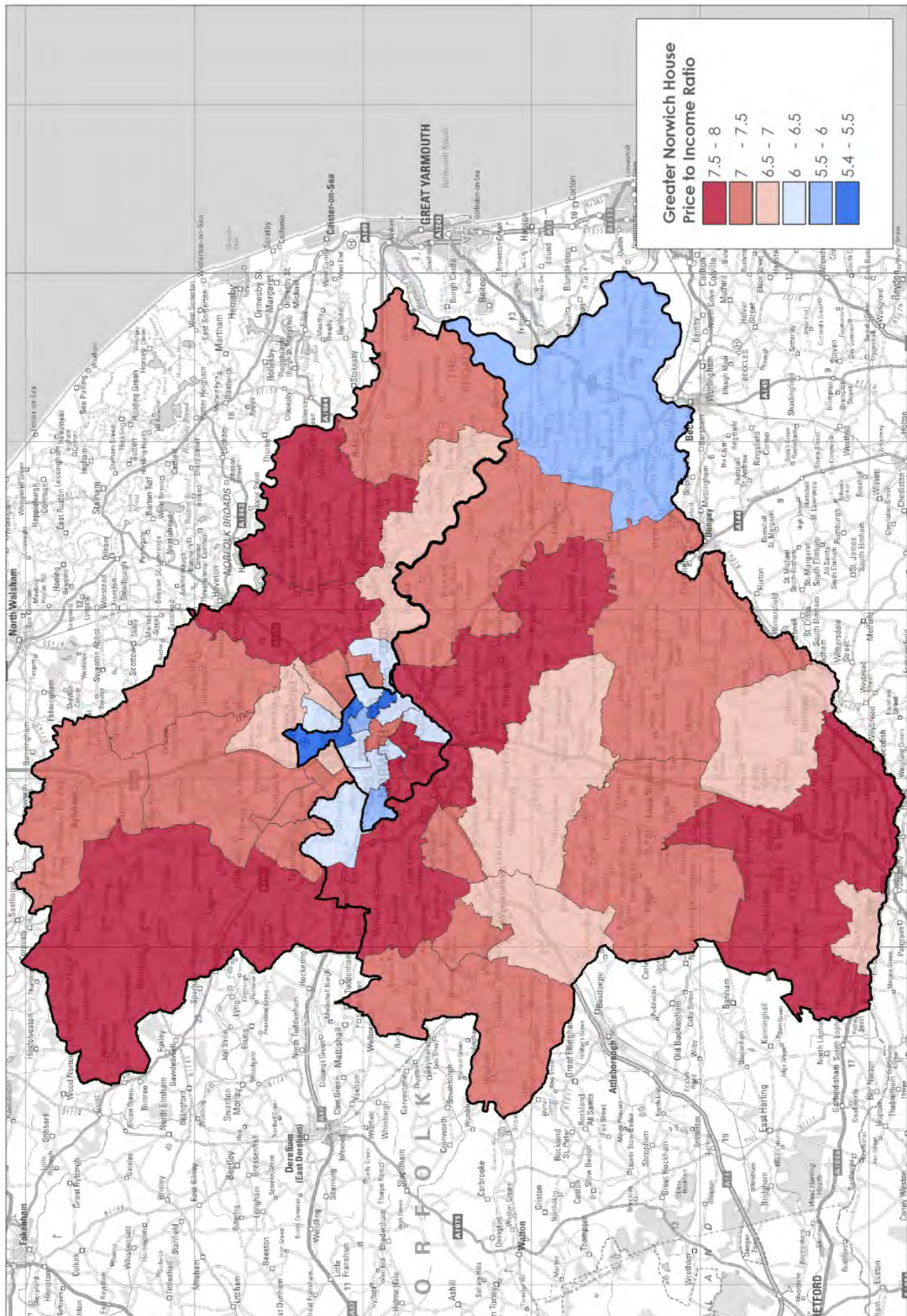
- 3.9 Overall the property analysis above suggests a lower demand for office space than industrial space across the NPA which is particularly acute in the city centre. Although a long term trend is difficult to pinpoint, there does appear to be some reduced activity in the office market. Examples such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

Housing Market

- 3.10 Alongside the geographies of commercial property floorspace and cost, house price affordability is also of interest because it reflects how well a local economy is doing, how desirable an area is, whether there may be affordability issues for attracting talent, and is comparable across the country. In Lloyds Bank's 2017 housing affordability report², Norwich's housing market was ranked the 15th most expensive in the country. Norwich is therefore considered a desirable place to live and work, which is also reflected in its large HMA catchment as discussed above.
- 3.11 Figure 15 below shows housing affordability in postcode areas across Greater Norwich. It shows that the most affordable locations are primarily located in the Norwich urban area, the highest value postcodes in Norwich are those to the south west. These value dynamics are driven by a complex range of inter-related factors including stock typology and age, mix of housing tenures, amenities and transport provision, quality of environment etc.

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

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



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

Source: GVA, ONS, 2017

4. Growth Drivers

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

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

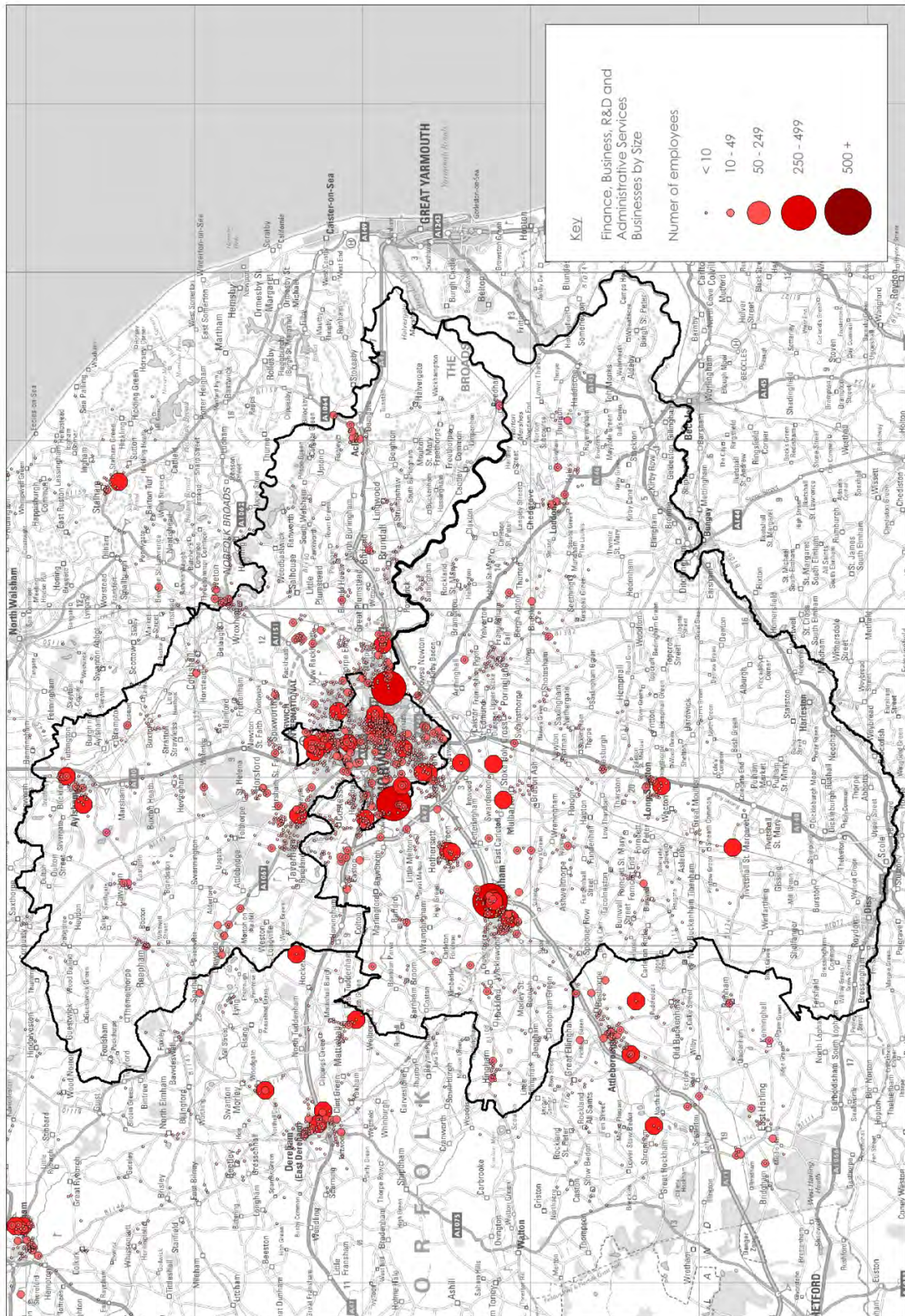
- Growth Locations
 - Norwich Research Park/ Cringleford
 - Broadland Business Park
 - Old Catton Sprowston, Rackheath, St Andrew Growth Triangle
 - Longwater/ Easton/ Cotessey
 - Wymondham and Hethel
 - Hethersett
 - Long Stratton
 - Norwich Airport
 - Norwich Urban Area
- Key Infrastructure
 - Northern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

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

Growth Locations

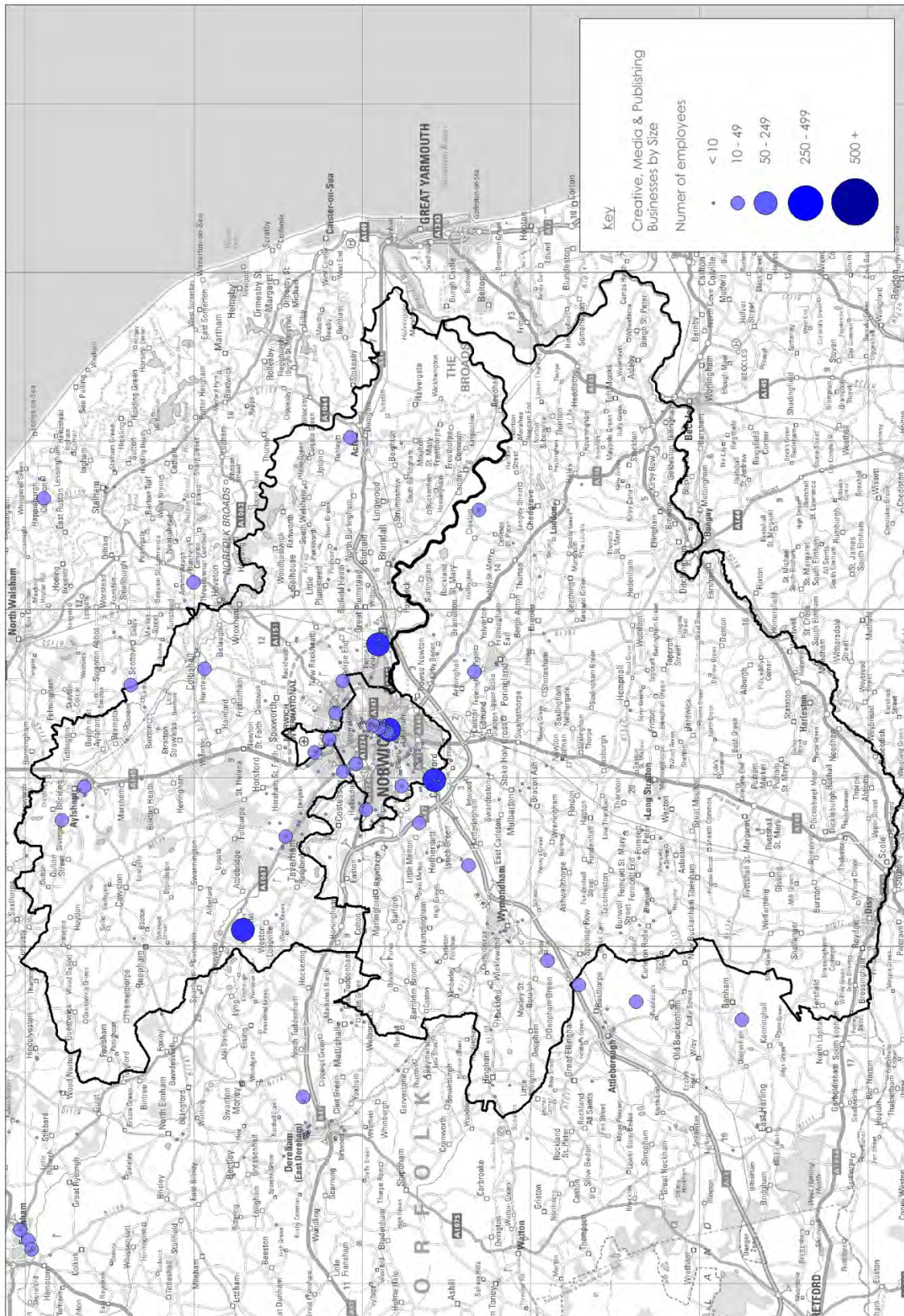
- 4.4 Growth locations are the hubs or nodes within a cluster, which forms a local economic area, where the majority of economic and commercial activity takes place. These centres typically attract the co-location of businesses, jobs and homes and therefore form the principal economic drivers of the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

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



Source: EGi, 2017

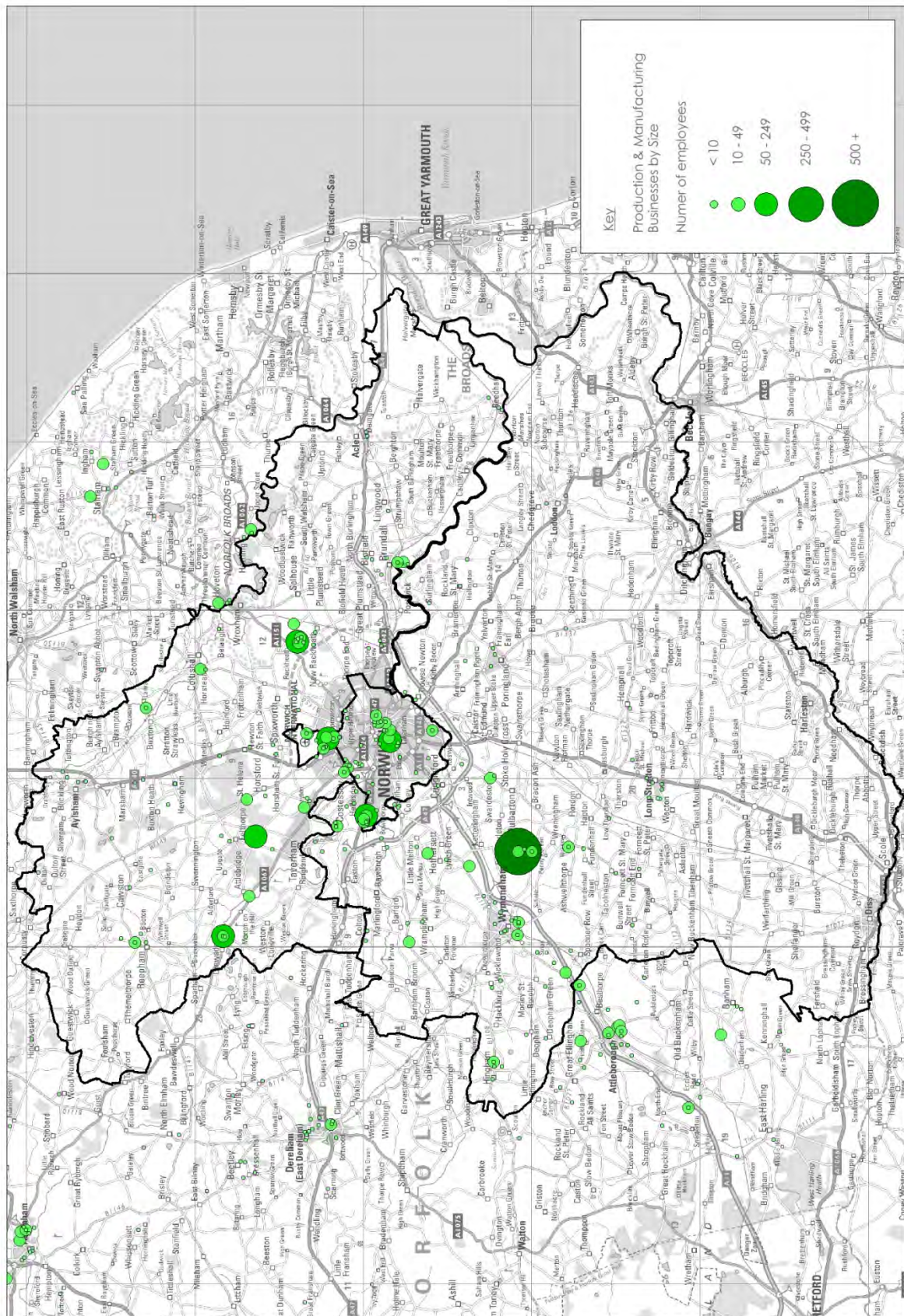
Figure 18: Business unit count based on number of employees: Creative, Media and Publishing Businesses



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

Source: GVA, EGi, 2017

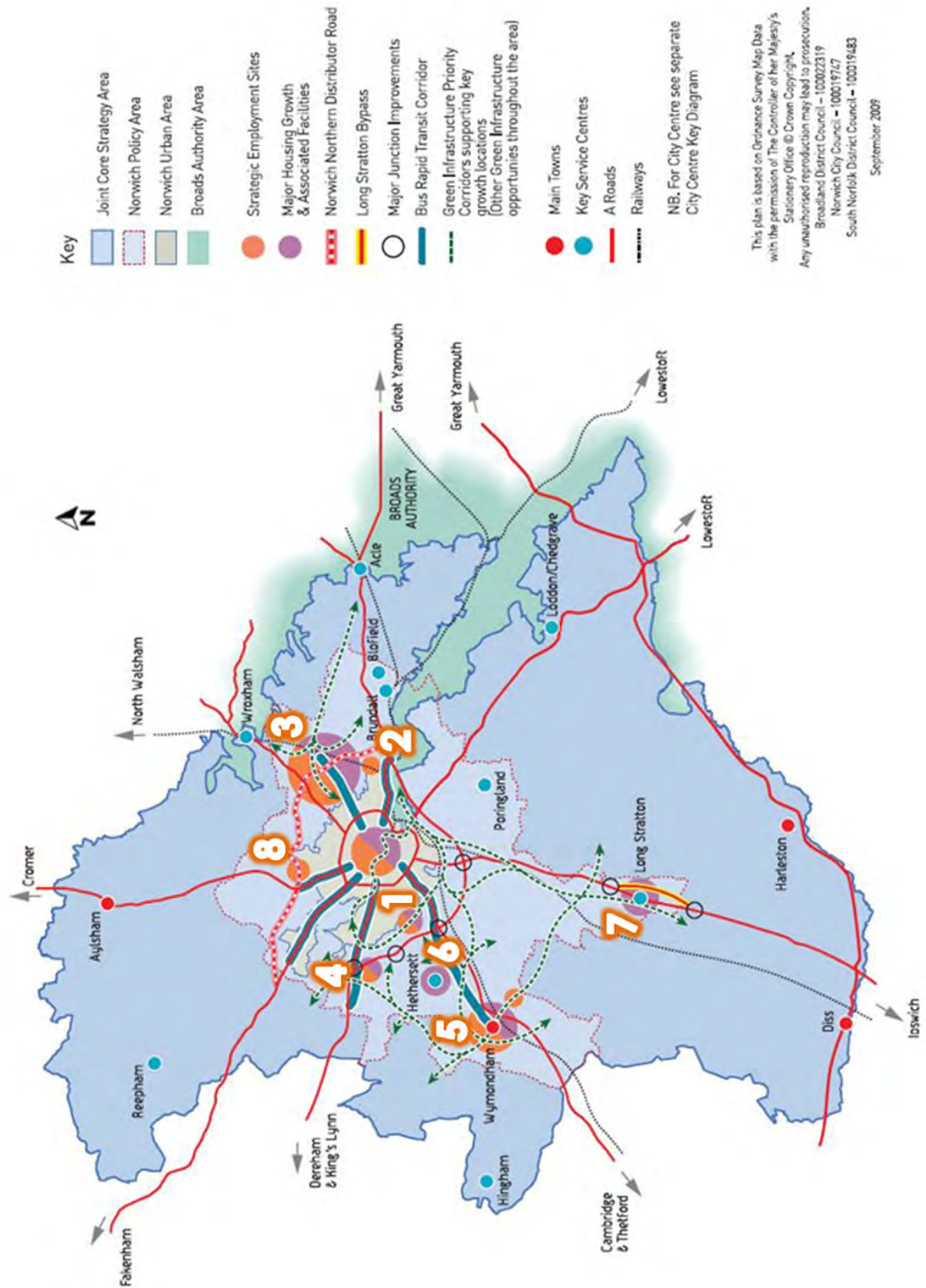
Figure 19: Business unit count based on number of employees: Production and Manufacturing Businesses



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

Source: GVA, EGi, 2017

Figure 20: Existing Major Growth Locations



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

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

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

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

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

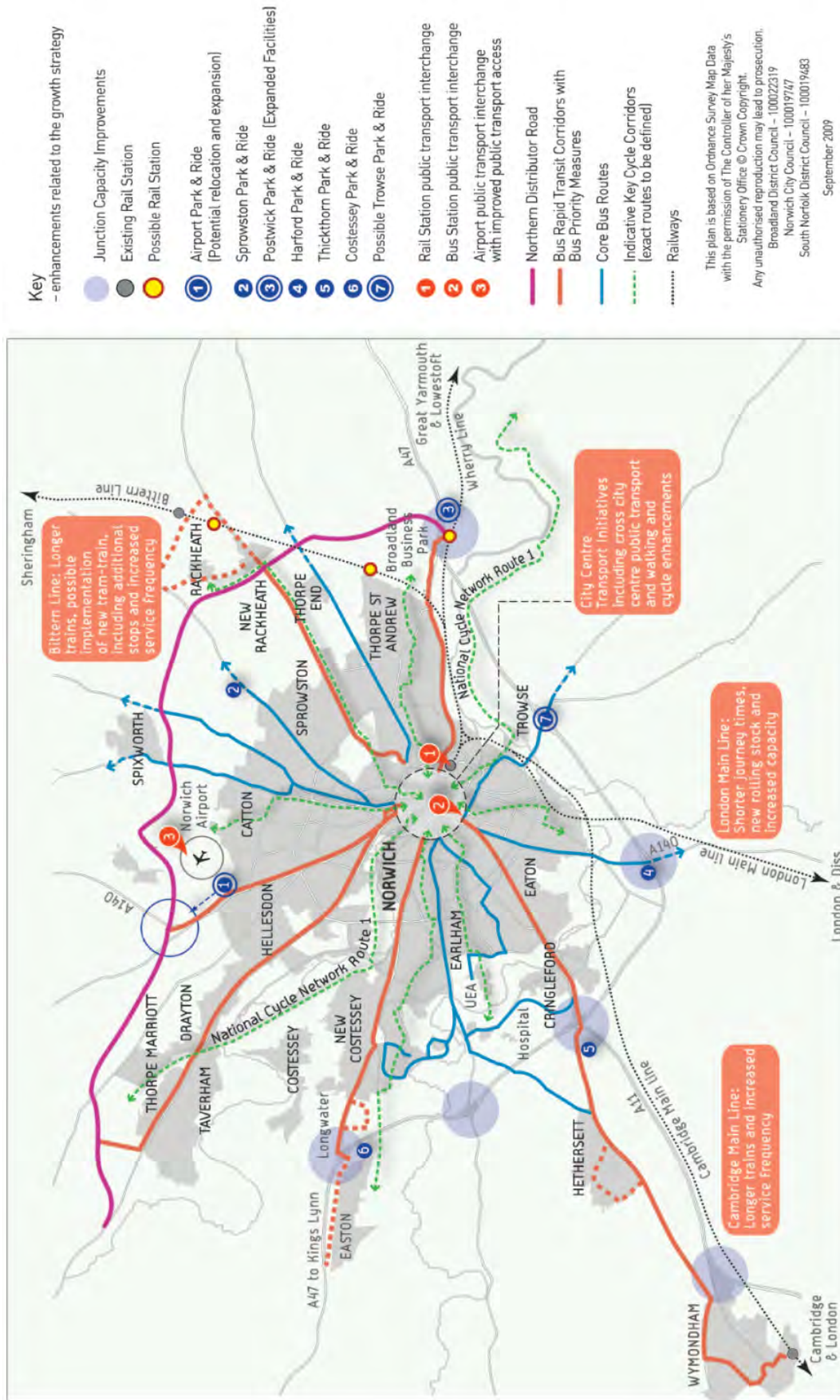
Ref No	Growth Location	Description	Infrastructure Influence	Priority Growth Sectors
		Technology Park is planned for Hethel.		
6	Hethersett	<ul style="list-style-type: none"> Hethersett is a large village located to the south west of Norwich following the A11. The Hethersett North masterplan is expected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

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

Key Infrastructure

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

Figure 21: Norwich Area Transportation Strategy – proposed implementation plan



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

Table 2: Key Infrastructure and growth Locations

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

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

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

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

Game Changer: East-West Rail

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

Figure 22: East West Rail Routes



Source: Network Rail, 2017

City centre

- 4.9 The Norwich city centre is the primary employment centre in the Norwich economy. As shown in the property section, the city centre accommodates 68% of the existing floorspace in the NPA and a sizeable amount of industrial floorspace. The core is home a variety of businesses, particularly those within finance and knowledge intensive businesses (KIBs). Further, the core is seeing growth with 100,000m² of office floorspace proposed for the city centre³.
- 4.10 The city centre is also a hub for education and the arts based around the City College, and the Norwich University of the Arts with wider provision, including Easton & Otley College, in the city's rural hinterland. These institutions are critical to supplying the city with a skilled labour force across a range of sectors, including the KIBs, technology and food/land based science and research
- 4.11 Norwich University of the Arts provides a strong supply of graduates in video games art, design, digital photography, and film, underpinning the strength of the local digital technology sector.
- 4.12 The University of East Anglia, is a critical asset to the Norwich economy, attracting students from across the UK and internationally. It provides market leading research and development activity in a range of core growth sectors including environmental science and climate change, health, food science and digital technology and is a key supporting factor in promoting the city on the international stage. Its specialisms in the life and health sciences in particular underpin major links to other hubs such as Cambridge, helping support a wider ecosystem of activity.
- 4.13 Teaching activity in fields such as legal and accounting, computer science, software engineering and film, television and media studies all provide a strong workforce for businesses located in (or seeking to locate in) the city.
- 4.14 A talented labour pool is not only important for meeting the needs of businesses but also helps to contribute to the amenities and services that make a place desirable to live and work. As is shown in the property section, Norwich is one of the most desirable places to live in the UK and this is the result of such amenities as well as factors such as access to good jobs. The city has an historic character, which is supported by the prominence of the Norman castle and cathedral, as well as a strong retail and leisure offer than includes a series of independent stores set within the Norwich lanes. The strength of these amenities was acknowledged within the winning of the Great British High Street Award in 2014 in the city category.
- 4.15 Such amenities are valued for attracting skilled labour and retaining graduates who are some of the most mobile in the UK labour force. However, the city centre has been struggling in recent years to retain office occupancy levels as shown in the property section of this report, albeit some

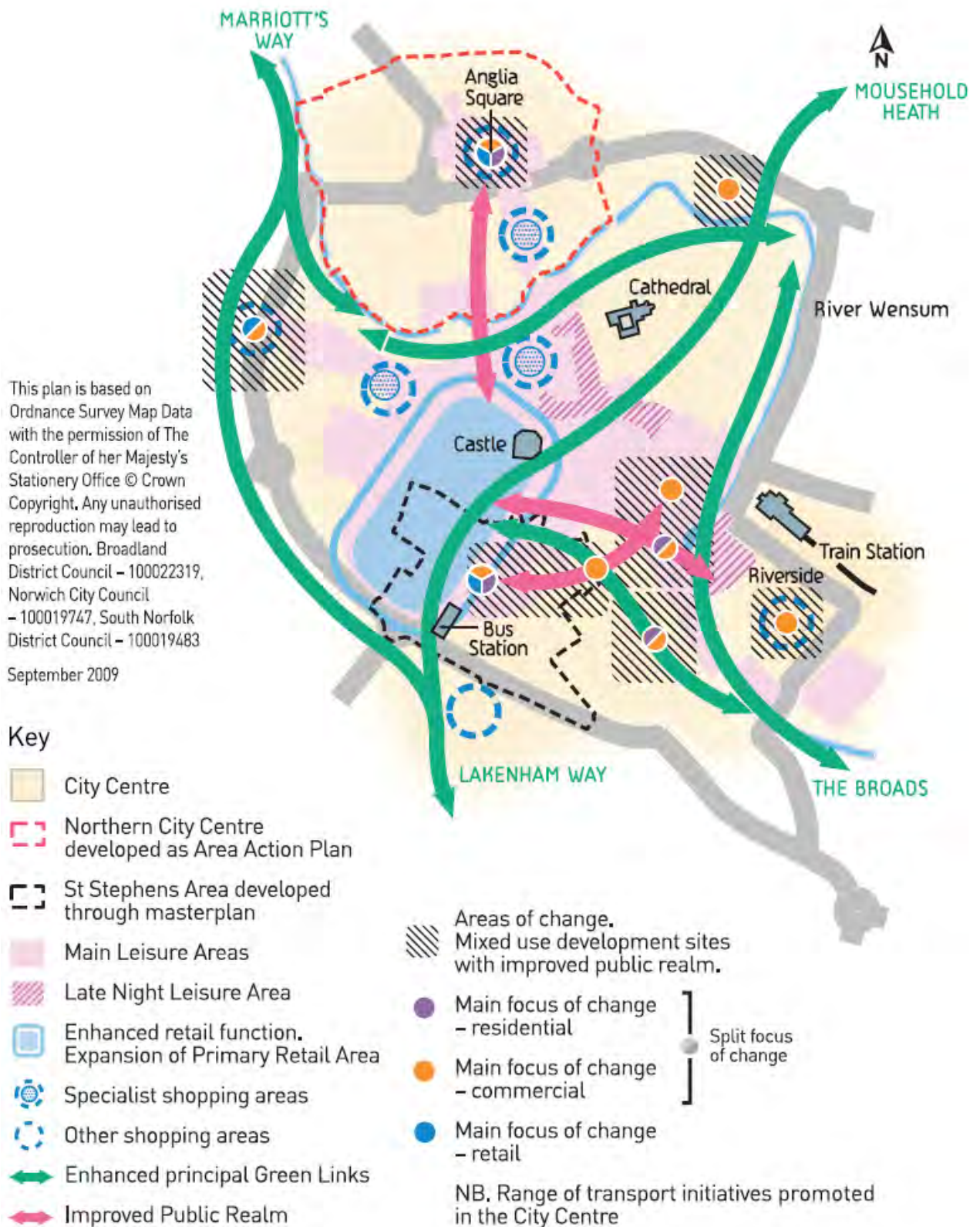
³ CoStar

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

- 4.16 Taking a more united approach across the broader NPA area, rather than the local authority level, will aid in managing some of the movements in a way that works for Norwich as a whole. There is, however, scope to attract businesses to Norwich, particular given the noted desirability of the city and the quality of its amenities. The 2016 Tech Nation report⁴ identifies Norwich as an early-stage cluster, with potential across a range of tech sectors and a burgeoning network of tech groups such as Hot Source, Norfolk Developers and SyncNorwich.
- 4.17 Currently, as noted in previous sections, there is an existing stock of space available within the city centre, however only a small share provides the quality and nature of space that is likely to be attractive to suit tech businesses, particularly start-ups. The Tech Nation report notes that co-working spaces such as Whitespace are providing affordable space for startups and helping the market, however our assessment is that further space will be required of the appropriate type/quality.
- 4.18 Tech Nation also noted wider challenges to startups which are gradually being addressed, albeit more could be done. For example the challenge of access to finance is slowly being addressed with schemes such as Grants4Growth. Further, Norwich's key asset is its access to talent, which is commonly found to be the biggest issue for tech firms and KIBs more generally, with the third highest concentration of science and research parks in the country and two leading universities.
- 4.19 As the Tech Nation report finds, Norwich not only has a suite of amenities that are attractive to a range of businesses, but also has an existing cluster of KIB businesses and networks, affordable workspace, finance provision, and skilled labour force that makes the city attract to high value tech businesses. Providing evidence, 5,306 digital tech jobs were identified in Norwich, with many based in the core, creating £148m in GVA from digital firms that increased by 22% between 2010 and 2014. As suggested, there is clear potential to further improve on this existing strength and to build on what differentiates the core from peripheral locations and to attract businesses that prefer to locate in central, 'buzzing' locations.

⁴ http://www.techcityuk.com/wp-content/uploads/2016/02/Tech-Nation-2016_FINAL-ONLINE-1.pdf

Figure 23: Norwich City Centre



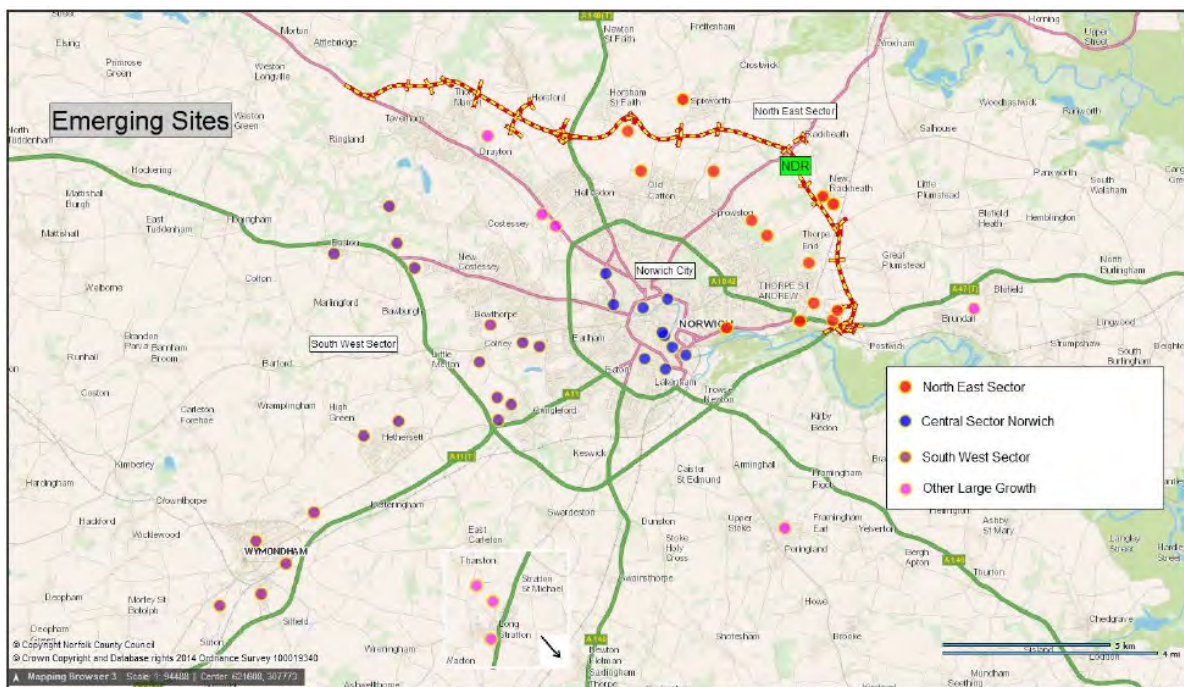
Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

Summary/Findings

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

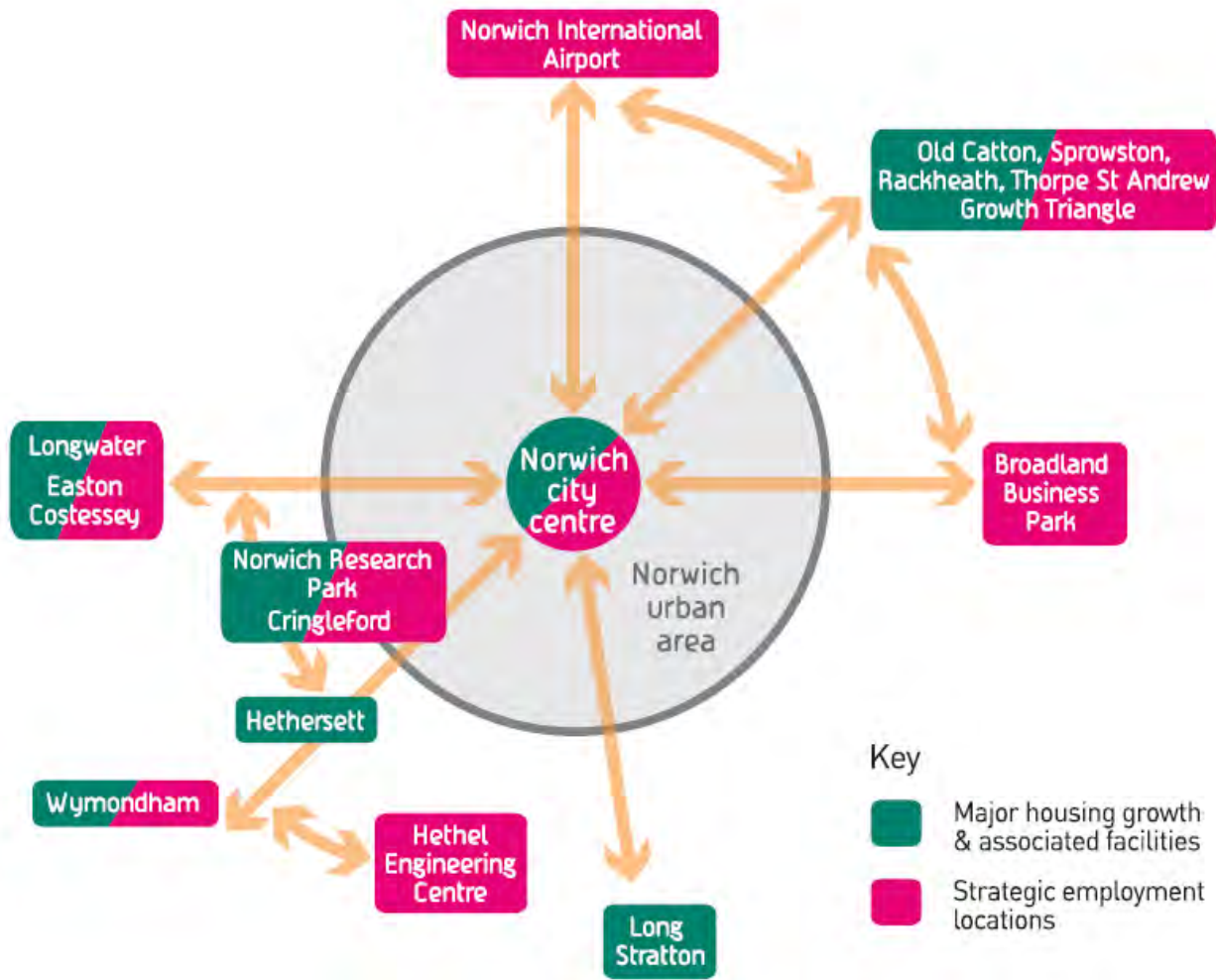
4.21 This section also shows that there is some competition between growth locations in the Norwich that may not be being managed effectively and is causing loss of office occupancy in the city centre. Management at the NPA level will aid to deliver a strategy that works better for Norwich as a whole,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

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



Source: Greater Norwich Infrastructure Plan, published in July 2016

Figure 25: Relationships between Norwich Growth Locations



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

5. Conclusions

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

APPENDIX 3

MARCH 2019 CONSULTATION REPS

GREATER NORWICH LOCAL PLAN

REGULATION 18 CONSULTATION
DRAFT STRATEGY

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

March 2020

GREATER NORWICH LOCAL PLAN

**REGULATION 18 CONSULTATION
DRAFT STRATEGY**

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

March 2020

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CONTENTS

	PAGE NO.
1.0 INTRODUCTION	01
i) National Planning Policy Framework	02
ii) Summary of Representations	04
iii) Sustainability Appraisal Review	05
2.0 THE DRAFT STRATEGY	06
3.0 SUITABILITY FO WYMONDHAM	30
i) Secondary Education Capacity	32
4.0 SUITABILITY OF LAND AT NORTH EAST WYMONDHAM	34
i) Landscape and Visual	35
ii) Traffic and Transport	36
iii) Flood Risk and Drainage	37
iv) Ecology	38
v) Built Heritage and Archaeology	39
vi) Air Quality	39
vii) Utilities	40
viii) Energy	40
ix) Contamination	41
x) Noise and Vibration	41

APPENDICES

APPENDIX 1	SITE LOCATION PLAN
APPENDIX 2	MARCH 2018 CONSULTATION REPS
APPENDIX 3	SUSTAINABILITY APPRAISAL REVIEW
APPENDIX 4	ANNUAL MONITORING REPORT 2018-19
APPENDIX 5	ILLUSTRATIVE MASTERPLAN
APPENDIX 6	VISION DOCUMENT

1.0 INTRODUCTION

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

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

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

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

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

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

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

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

i) National Planning Policy Framework

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

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

ii) Summary of Representations

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

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

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

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

iii) Sustainability Appraisal Review

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

2.0 THE DRAFT STRATEGY

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

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

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

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

Q3, Q4 & Q5) Greater Norwich Spatial Profile

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Table 2.3: Growth Triangle Area Action Plan allocations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Q48) Any other Comments?

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

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

3.0 SUITABILITY OF WYMONDHAM

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

The Strategic Gap

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

Wymondham Abbey and the Historic Landscape Setting of the Town

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

The capacity of Wymondham High School (Academy)

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

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

i) Secondary Education Capacity

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

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

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

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

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

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

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

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

4.0 SUITABILITY OF LAND AT NORTH EAST WYMONDHAM

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

4.7 As demonstrated on the Masterplan, the development seeks to deliver:

- 650 new homes, including 33% affordable housing;
- A Local Centre (accommodating up to 1,950sqm floorspace with potential for A1 – A5 and D1 uses);
- Land for a 2-form entry primary school;
- Land for the relocation of Wymondham High's Sixth Form; and
- Significant areas of open space including the creation of a new Country Park.

4.8 The delivery of a new Sixth Form site in Wymondham is a strategically important matter. Therefore, the provision of land to enable this within the Site is considered to be a substantial benefit that the scheme can deliver, thus providing a solution to the persistent education constraint which has continued through previous plan-making exercises.

4.9 The new Sixth Form site is ideally located on the new Wymondham Hethersett cycle route located along the B1172 (Norwich Common), as well as being accessible to the existing bus stops along this road and the proposed route of the Bus Rapid Transit service from Wymondham Railway Station to Norwich.

4.10 The Site would enable the delivery of 'Kett's Oak Common' a new Country Park located to the east of Wymondham and an accessible location to Hethersett. This has the dual purpose of enhancing the seeking of the historic Kett's Oak tree and improving public accessible and recreational opportunities to the countryside, a key policy objective (WYM 9) of the Wymondham Area Action Plan.

4.11 A Preliminary Vision Document has been prepared (**Appendix 6**) which demonstrates how development on the Site would assist in enhancing the new community in North East Wymondham by providing much needed day-to-day services.

4.12 The remainder of this section summarises the technical and environmental work being undertaken to support the emerging planning application for the Site which demonstrate it is wholly suitable for development.

i) Landscape and Visual

4.13 A Landscape and Visual Impact Assessment has been undertaken assessing likely significant effects of the proposed development on the environment in respect of landscape and views.

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

ii) Traffic and Transport

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

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

iii) Flood Risk and Drainage

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

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

iv) Ecology

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

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

v) Built Heritage and Archaeology

- 4.36 A Cultural Heritage Desk-Based Assessment has been undertaken to review potential heritage constraints to the proposed development.
- 4.37 In respect of Built Heritage, there are no designated assets located within the Site or the immediate area. Furthermore, the Site is not located within the vicinity of a Conservation Area.
- 4.38 The proposed development would therefore have a 'neutral' impact upon the significance of any built heritage assets in the surrounding area. No built heritage specific mitigation is required in this instance.
- 4.39 In respect of archaeological assets, no Scheduled Monuments, World Heritage Sites, Historic Battlefield Sites or Historic Wreck Sites lie within the immediate vicinity of the Site. Past archaeological investigations within the immediate vicinity of the Site have identified archaeological evidence of low (local) significance only.
- 4.40 A geophysical survey of the Site has taken place confirming there to be no features of likely archaeological interest.
- 4.41 It is anticipated no further work is necessary to inform a planning application in respect of the proposed development however proportionate targeted archaeological investigation (trial trenching) can be undertaken post-consent secured by an appropriately worded planning condition.

vi) Air Quality

- 4.42 An Air Quality Assessment has been undertaken to inform the proposed development for the Site to consider potential air quality impacts associated with both construction and operation.
- 4.43 Modelling work completed to date confirms pollutant levels at sensitive locations across the Site are below relevant Air Quality Objectives. The location is therefore considered suitable for development without the need for mitigation measures to protect future users from poor air quality.

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

vii) Utilities

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

viii) Energy

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

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

ix) Contamination

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

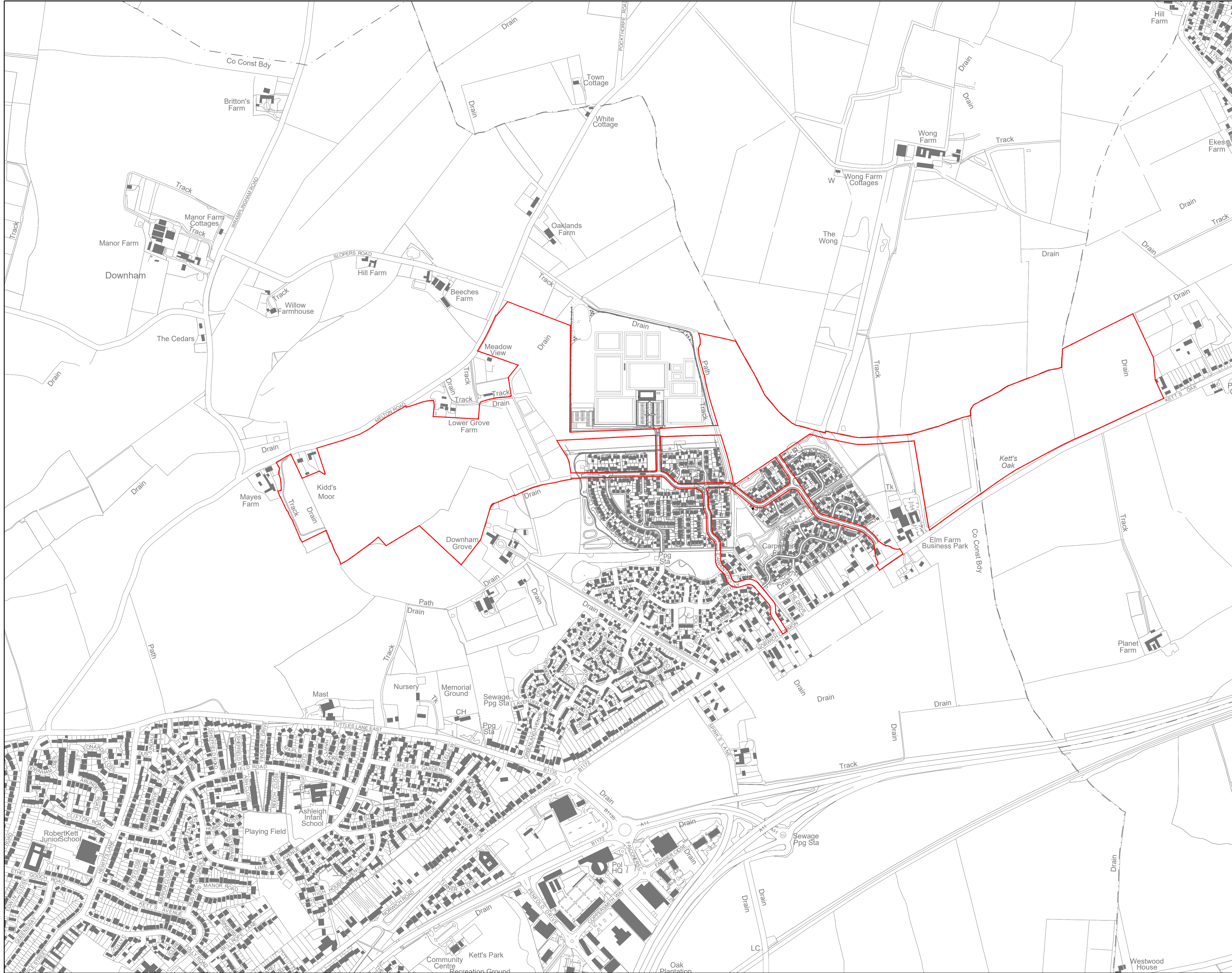
x) Noise and Vibration

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

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

APPENDIX 1
SITE LOCATION PLAN

Application Site Boundary
 (59.87Ha □147.94Ac)



Project
NORTH EAST WYMONDHAM

Drawing Title
Site Boundary Pan

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

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APPENDIX 2

MARCH 2018 CONSULTATION REPS

GREATER NORWICH LOCAL PLAN

REGULATION 18 CONSULTATION

GROWTH OPTIONS

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

March 2018

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

	PAGE NO.
1.0 INTRODUCTION	01
i) National Planning Policy Framework	01
ii) Proposed Amendments to the National Planning Policy Framework	02
iii) Summary of Representations	04
2.0 HOUSING NUMBERS	09
3.0 SPATIAL OPTIONS	12
4.0 THE GROWTH OPTIONS	13
i) The Base Line	13
ii) The Ranking of Locations Outside of the Settlement Hierarchy	13
iii) Option 1 – Concentration Close to Norwich	15
iv) Option 2 – Transport Corridors	16
v) Option 3 – Support the Cambridge Norwich Tech Corridor	17
vi) Option 4 – Dispersal	18
vii) Option 5 – Dispersal plus New Settlement	19
viii) Option 6 – Dispersal plus Urban Growth	19
5.0 SUITABILITY OF WYMONDHAM	28
i) Secondary Education Capacity	29
6.0 SUITABILITY OF LAND AT NORTHEAST WYMONDHAM	31
7.0 CONCLUSION	34

APPENDICES

APPENDIX 1: Illustrative Site Masterplan

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

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

1.0 INTRODUCTION

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

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

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

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

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

i) National Planning Policy Framework

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

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

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

iii) Summary of Representations

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

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

1.20 In summary, our representations demonstrate:

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

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

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

Table 1.1 – GOCD response summary

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

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

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

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

2.0 HOUSING NUMBERS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3.0 SPATIAL OPTIONS

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

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

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

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

4.0 THE GROWTH OPTIONS

i) The Base Line

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

ii) The Ranking of Locations Outside of the Settlement Hierarchy

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

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

Q9) Which alternative or alternatives do you favour

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

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

Table 4.1 – Main Town Distribution (dwellings)

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

iii) Option 1 – Concentration Close to Norwich

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

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

iv) Option 2 – Transport Corridors

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

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

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

v) Option 3 – Support the Cambridge Norwich Tech Corridor

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

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

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

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

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

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

vi) Option 4 – Dispersal

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

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

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

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

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

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

vii) Option 5 – Dispersal plus New Settlement

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

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

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

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

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

viii) Option 6 – Dispersal plus Urban Growth

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

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

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

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

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

Table 4.2 – ‘Hybrid Options’ Proposed Dispersal

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

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

4.50 Furthermore, through the allocation of sufficient growth to Wymondham the GNLP has the potential to resolve the ongoing Secondary Education capacity constraint currently affecting the south-west area (as detailed further in subsequent sections). While identified as an existing constraint by the Interim Sustainability Appraisal under objective SA10, the consultation fails to regard how the alternatives would influence this (either negatively or positively). Currently, any growth attributed to the south-west of the District has the potential to exacerbate this issue, with a risk that a no growth option could be considered if the situation is not suitably dealt with. This would have a fundamental impact on the potential of the GNLP to deliver its full economic and social benefits, with any growth directed away from the Cambridge Norwich Tech Corridor. It is therefore considered that a 'no growth' option within this south-west area is not an appropriate alternative. The education 'issue' therefore must be dealt with through this plan-making process.

4.51 Therefore, the preferred alternative is one which includes a recognition of the importance of the 'Core Area', directs significant growth to the Cambridge Norwich Corridor and allocates sufficient growth in Wymondham to resolve the strategically important issue of Secondary education capacity. This is a reasonable alternative which would help achieve the objectives of the GNLP. To ensure the plan is justified, this reasonable alternative therefore needs to be assessed as part of the Sustainability Appraisal to be undertaken.

4.52 A report, commissioned by Norwich City Council, entitled Norwich Economic Analysis (GVA, June 2017) examines the functional economic geography of Norwich and its growth potential. As acknowledged in para 2.8 of this report, the authority area of Norwich City Council is not an accurate geography in seeking to understand or capture the true economic value or potential created by Norwich. Instead the economic influence of Norwich extends beyond this urban area. Para 2.19 and Figure 6 (taken directly from the SHMA 2016) identify strong labour

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

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

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

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

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

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

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

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

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

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

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

5.0 SUITABILITY OF WYMONDHAM

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

The Strategic Gap

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

Wymondham Abbey and the Historic Landscape Setting of the Town

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

The capacity of Wymondham High School (Academy)

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

- 5.7 The SPCD acknowledges these constraints, as well as the identifying a potential highways capacity issue regarding a bottleneck under the railway line which could further constrain development to the south of the town.
- 5.8 Regardless of these constraints, as the largest settlement in South Norfolk, a key location within the Core Area and Cambridge Norwich Corridor, and a location with high demand for new homes, Wymondham is a location where continued growth should be encouraged and allowed to occur.
- 5.9 The Site, at North East Wymondham, can deliver significant growth in a sustainable and suitable location which has regard to (where necessary) the limited number of identified constraints. This is detailed further in Section 6. It is not located in the Strategic Gap (save an expect an area of proposed Country Park) nor does it affect the setting of the Grade I Wymondham Abbey.

i) Secondary Education Capacity

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

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

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

6.0 SUITABILITY OF LAND AT NORTHEAST WYMONDHAM

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

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

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

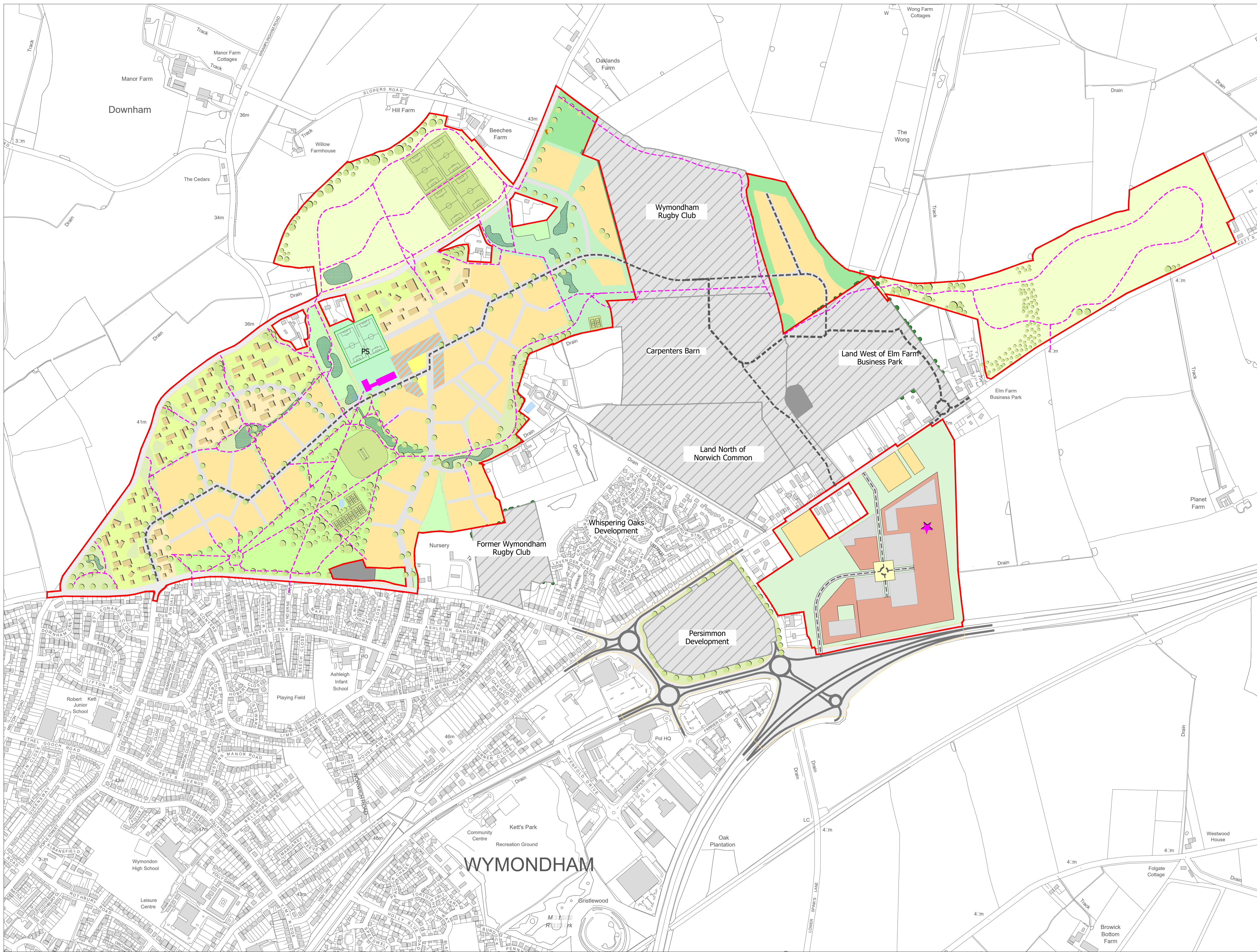
7.0 CONCLUSION

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

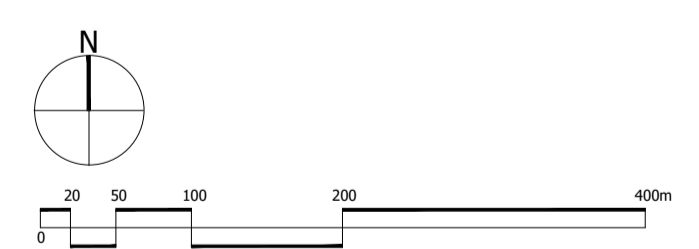
- 7.6 On this basis, we consider a hybrid version of Growth Options 2 and 3 should come forward as a preferred options, serving to ensuring the Core Area is supported with a focus for delivering development along the Cambridge Norwich Tech Corridor (A11). A proposed dispersal is included in Section 4.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

APPENDIX 1

Illustrative Site Masterplan



- Legend**
- Site Boundary (159.70ha □B94.63ac)
 - Development
 - Mid Use Employment
 - Low Density Development Edge □
 - Local Centre
 - Primary School
 - Square
 - Road
 - Strategic Leisure Pedestrian and Cycleways Routes
 - Landscape Buffer □ Open Space
 - Natural Green Space
 - Meadow Land
 - Allotments Orchard
 - Town Park
 - Sports Pitches Courts
 - Existing Uses to be Retained
 - Approved Development Schemes & Schemes Under Construction
 - Existing Landscape to be Retained
 - Proposed Tree Planting
 - Attenuation Ponds
 - Existing Water Bodies
 - ★ Potential Secondary Education Facility
- Graphic not Denoting Layout or Density of Development.



Project: NORTH EAST WYMONDHAM □ NORFOLK □
 Drawing Title: ILLUSTRATIVE MASTER PLAN

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



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APPENDIX 2

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

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

Summary

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

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

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

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

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

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

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

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

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

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

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

Introduction

1. The National Planning Policy Framework (NPPF) seeks to boost significantly the supply of housing. To achieve this local authorities are required: to meet the *'full, objectively assessed needs for market and affordable housing in the housing market area'*; and, demonstrate *'a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% ... to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20%'*.
2. The National Planning Practice Guidance¹³ (NPPG) states that requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the 5 year supply and that considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light.
3. The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was adopted in March 2011, with amendments January 2014. It establishes a housing requirement for Greater Norwich to 2026. This housing requirement was to be monitored separately against a core Norwich Policy Area (NPA) and the two residual rural areas of Broadland and South Norfolk. Significant new evidence on housing need, in the form of the Central Norfolk SHMA, was published in January 2016 and updated in July 2017.
4. Since its adoption in 2011, housing delivery in the NPA has not kept pace with the JCS housing requirement nor has it been possible to demonstrate a 5 year housing land supply. The absence of land supply persists despite the delivery of very significant increases in housing land supply commitments (the sum of planning permission and allocations of land). Housing delivery has however significantly exceeded the JCS housing requirements in the residual rural areas of Broadland and South Norfolk and a plentiful land supply continues to be maintained.
5. If measured against the more recent SHMA assessment of OAN there has been a housing delivery surplus in the NPA and the residual rural area of Broadland and there is a plentiful housing land supply. Within the residual rural area of South Norfolk there has been a relatively small housing shortfall and it is not possible to demonstrate a 5 year housing land supply.
6. The following sections of this report set out in more detail the issues that relate to housing land supply across Greater Norwich.
7. The tables 2 to 11 and the housing trajectories and forecasts included as appendices A to D set out the housing land supply position as at 1 April 2017 for the respective parts of the Greater Norwich area based both on the JCS housing requirements and the significant new evidence of housing need as contained in the 2017 Central Norfolk SHMA.
8. Notwithstanding the existence or otherwise of a housing land supply or the fact that housing commitments are at an all-time high, the Greater Norwich Authorities recognise that there is a need for the identification of further housing land above and beyond the existing housing commitments to 2036. The authorities have committed to the joint production of the Greater Norwich Local Plan (GNLP) to plan for these additional needs. Nevertheless, ahead of the adoption of the GNLP the authorities will continue to take a

¹³ Paragraph 30, ID: 3-030-20140306

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

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

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

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

¹⁴ See part JCS Inspector's report para 40.

Housing Shortfall

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

Table 1 Housing Delivery against JCS NPA Requirement

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

Table 2 Housing Delivery against JCS RPA Requirement

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

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

Housing Backlog

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

Sources of Supply

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

Student Accommodation

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

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

Methodology for Calculating Housing Land Supply

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

Persistent Under Delivery

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

Liverpool vs Sedgefield approaches to recovering shortfall

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

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

¹⁶ 2013 JCS Inspector's Report, para 66

36. Subsequent to the publication of the PPG various site specific documents for South Norfolk and Broadland¹⁷ have been examined and found sound based on the Liverpool approach. The Inspector for the South Norfolk Site Specific Allocations noting that 'this is a reasonable, realistic and pragmatic approach, particularly given the reliance on larger strategic sites'¹⁸, similarly the Inspector for the Broadland documents concluded in both reports that 'I find that in this case the Liverpool approach is the most appropriate'¹⁹.
37. There is a strong logic to this approach. Having considered all reasonable alternatives in the plan preparation process it was determined that an approach involving a significant urban extension was the most appropriate option. This growth strategy is built around delivering significant new infrastructure, including the Northern Distributor Road, Long Stratton Bypass, new High School provision in the NE Growth Triangle, new Primary School provision at various locations, Bus Rapid Transit on key corridors, significant Green Infrastructure as well as a range of local enhancements.
38. It is very important that these major growth locations in Broadland and South Norfolk are not undermined by the release of a significant volume of smaller permissions that make little or no direct contribution to, and undermine the efficient and timely delivery of this key infrastructure. This issue is particularly significant in view of the extent of the backlog resulting from the prolonged downturn in the property market since 2008, which coincided with the base year of the JCS, which if the Sedgefield approach were applied could lead to a significant volume of permissions diverting investment away from the sites necessary to deliver the strategy.
39. Moreover, the approach to the application of the Liverpool approach in Greater Norwich is fully consistent with the national ambition to significantly boosting the supply of housing land. Meeting the revised JCS annual housing requirement already results in the need to identify a deliverable supply that is 60% above the baseline JCS housing requirement and doesn't leave a significant proportion of delivery to the last years of the Plan.
40. Therefore it remains appropriate to use the Liverpool methodology to monitor housing land supply where the JCS housing requirement is used as the starting point for the 5-year housing land supply calculation.
41. If the SHMA is used as the starting point for the 5-year housing land supply calculation in the NPA then there is only a housing shortfall, that needs to be recovered, in the SHMA OAN, including City Deals scenario. However, as there is an ample housing land supply across NPA under any SHMA scenario the question of the appropriate method to recover the shortfall is wholly academic.
42. There is also a housing shortfall identified in the South Norfolk RPA if the SHMA is used as the starting point for the 5-year housing land supply calculation. The appropriate method to recover will be considered separately, at this point in time a housing land supply cannot be demonstrated whichever method is used.

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

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

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

Housing Land Supply in the Norwich Policy Area (NPA)

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

Table 3 NPA Housing Land Supply - JCS Based

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

Table 4 NPA Housing Land Supply - SHMA OAN Based

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

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

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

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

Broadland and South Norfolk Rural Areas

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

Table 6 BDC RPA Housing Land Supply - JCS Based

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

Table 7 BDC RPA - SHMA OAN Based

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

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

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

Table 9 SNDC RPA - JCS Based

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

Table 10 SNDC RPA - SHMA OAN Based

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

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

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

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

March 2018

Appendix A1 – Whole Greater Norwich Area Trajectory

	Greater Norwich, all sites - 2008/09 to 2025/26	Completions										Projections										Total Delivered
		2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26			
Past Completions	Actual Completions - Previous Years	1,736	1,237	1,168	1,182	1,238	1,241	1,676	1,728													
	Actual Completions - Reporting Year																					
Future Supply	Projected Completions - Current Year								2,251													
	Projected Completions - Future Years Existing Sites									2,401												
Requirement taking into account completions	Managed delivery target - annual requirement taking account of past/projected completions	2,046	2,064	2,115	2,179	2,250	2,328	2,418	2,486	2,561	2,596	2,620	2,531	2,374	2,058	1,587	998	74	-2,303			
	JCS allocation annualised over 18 years (2008 - 2026)	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046		
		2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046		
		Five Year Supply										2,401	3,243	3,476	3,953	3,943	17,016	Units				
		Liverpool Five Year Requirement plus 20% (6 yrs)										3,115	3,115	3,115	3,115	3,115	15,575	Units				
																	1,441	Unit Surplus				
																		Yrs Land Supply		5.46		
																				41,937		
																				36,820		

Appendix A3 – Broadland Norwich Policy Area Trajectory

	Completions												Projections								Total Delivered
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26			
Broadland NPA, all sites - 2008/09 to 2025/26																					
13 December 2017 Draft																					
Actual Completions - Previous Years	104	84	81	157	56	217	217	340													
Actual Completions - Reporting Year								410													
Projected Completions - Current Year									463												
Projected Completions - Future Years										564	879	1,448	1,630	1,556	1,297	1,037	1,181				
Existing Sites																					
Managed delivery target - annual requirement taking account of past/projected completions	617	647	682	722	762	817	867	926	984	1,048	1,121	1,201	1,255	1,216	964	798	559				
JCS allocation annualised over 18 years (2008 - 2026)	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617		
Total	11,721																				

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

Appendix A4 – Norwich Trajectory

	Completions												Projections						Total Delivered
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	
Norwich, all sites - 2008/09 to 2025/26																			
13 December 2017 Draft																			
Actual Completions - Previous Years	527	399	377	280	407	210	252	365											
Actual Completions - Reporting Year									445										
Projected Completions - Current Year									428										
Projected Completions - Future Years Existing Sites										902	675	797	914	495	462	488	832		
Managed delivery target - annual requirement taking account of past/projected completions	477	474	479	486	501	508	533	558	578	592	613	554	506	404	373	329	169		
JCS allocation annualised over 18 years (2008 - 2026)	477	477	477	477	477	477	477	477	477	477	477	477	477	477	477	477	477	8,592	
Total																		9,255	

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

Appendix A5 – South Norfolk Norwich Policy Area Trajectory

	Completions										Projections						Total Delivered		
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24		2024/25	2025/26
South Norfolk NPA, all sites - 2008/09 to 2025/26																			
13 December 2017 Draft																			
Actual Completions - Previous Years	562	440	452	478	419	565	674	459											
Actual Completions - Reporting Year								955											
Projected Completions - Current Year									1,032										
Projected Completions - Future Years Existing Sites										1,104	1,192	1,089	974	1,050	885	755	655		
Managed delivery target - annual requirement taking account of past/projected completions	731	741	760	780	802	831	853	870	911	890	859	804	747	690	570	413	71		
JCS allocation annualised over 18 years (2008 - 2026)	731	731	731	731	731	731	731	731	731	731	731	731	731	731	731	731	731	731	731
	Total Required 13,156																		

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

APPENDIX 3

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

GREATER NORWICH TECHNICAL REPORT – ECONOMIC GEOGRAPHY

MARCH 2018

GREATER NORWICH
TECHNICAL REPORT – ECONOMIC GEOGRAPHY
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CONTENTS

PAGE NO

1.0	INTRODUCTION	01
2.0	POLICY CONTEXT	02
	i) Current National Policy and Guidance	02
	ii) Draft Updates to national Policy and Guidance	04
	iii) Emerging Greater Norwich Local plan – Regulation 19 Consultation	05
	iv) Policy Context – Key Issues	07
3.0	FUNCTIONAL ECONOMIC RELATIONSHIPS	08
	i) Central Norfolk SHMA (2015 and 2017)	08
	ii) Further Analysis	09
	iii) Functional Economic Relationships – Summary	17
4.0	ECONOMIC OUTLOOK	18
	i) Jobs Distribution	18
	ii) Employment Forecast	19
	iii) Further Growth Influences	22
	iv) Economic Outlook – Summary	24
5.0	CONCLUSION	25

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

1.0 INTRODUCTION

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

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

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

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

2.0 POLICY CONTEXT

i) Current National Policy and Guidance

National Planning Policy Framework, March 2012

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

iii) Emerging Greater Norwich Local Plan – Regulation 18 Consultation

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

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

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

iv) Policy Context – Key Issues

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

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

3.0 FUNCTIONAL ECONOMIC RELATIONSHIPS

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

i) Central Norfolk SHMA (2015 and 2017)

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

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

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

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

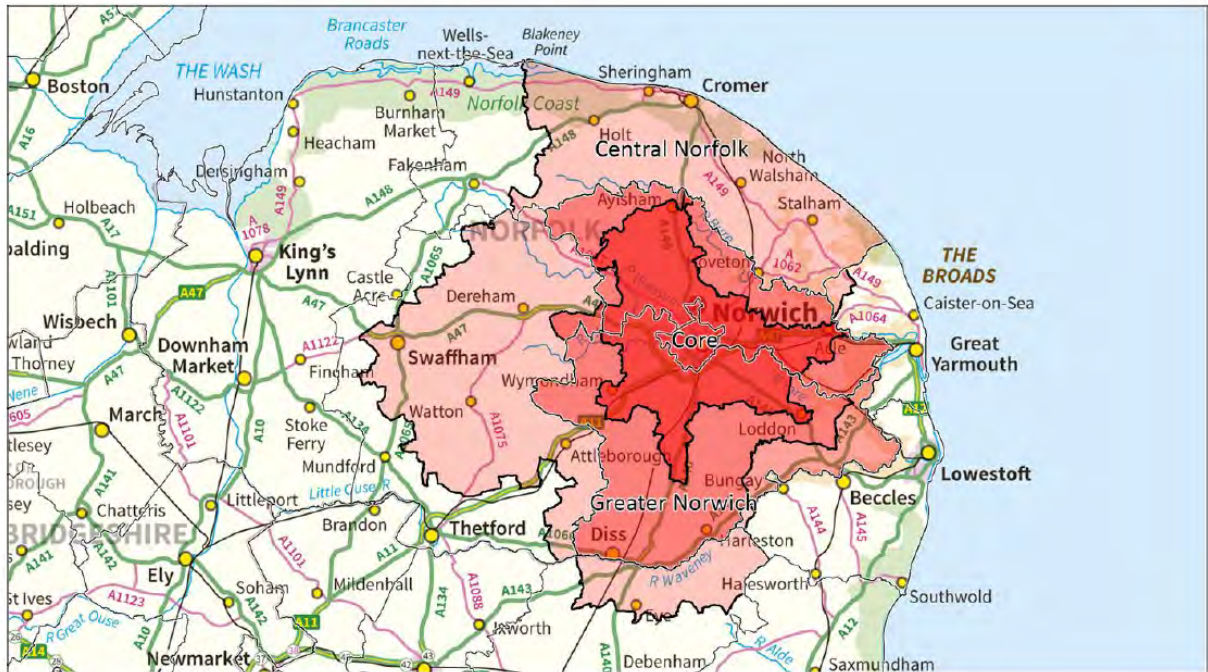
3.5 Ultimately, the SHMA recommends a three 'stage' HMA definition:

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

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

3.6 These HMA definitions are shown on Figure 3.1 below:

Figure 3.1: SHMA HMA Definitions



Source: ORS, Central Norfolk SHMA 2015

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

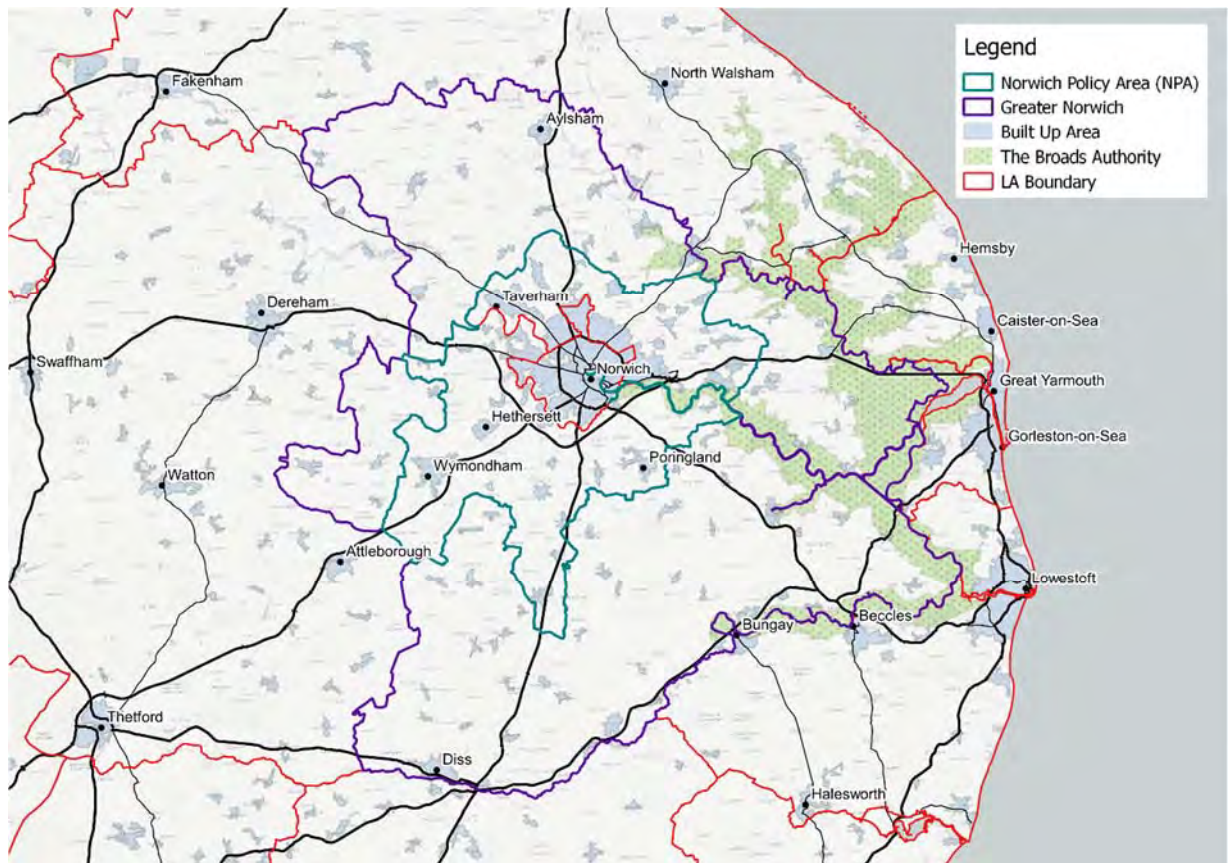
ii) Further Analysis

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

Context

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

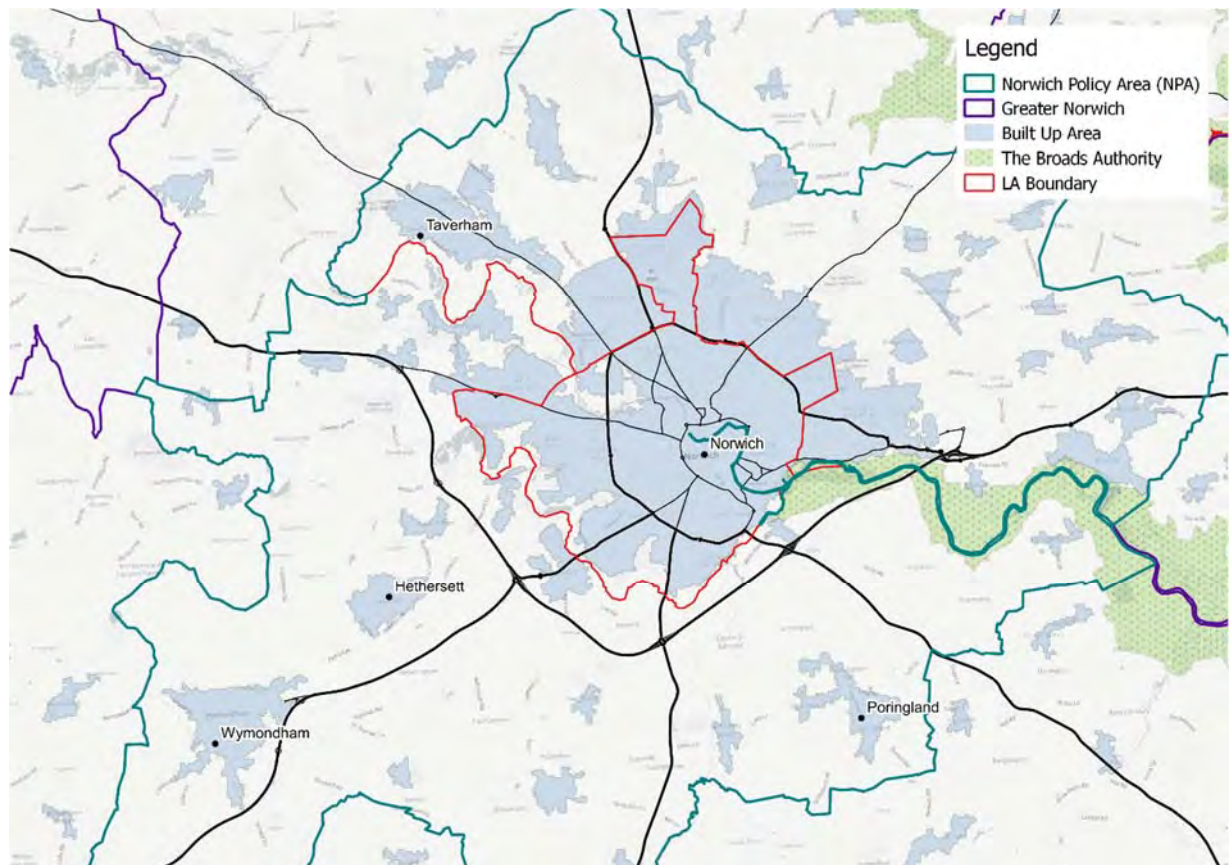
Figure 3.2: Context Plan



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- 3.10 The majority of larger settlements are located within the NPA; Diss and Aylsham are the only other settlements whose built up area populations¹ exceed 5,000 residents. Within the NPA, the largest built up areas outside of Norwich are Taverham and Wymondham, followed by Hethersett and Poringland.
- 3.11 Figure 3.3 below focuses on the Norwich urban area.

¹ Defined using ONS 2011 Built Up Area definitions

Figure 3.3: Context Plan – Norwich Urban Area

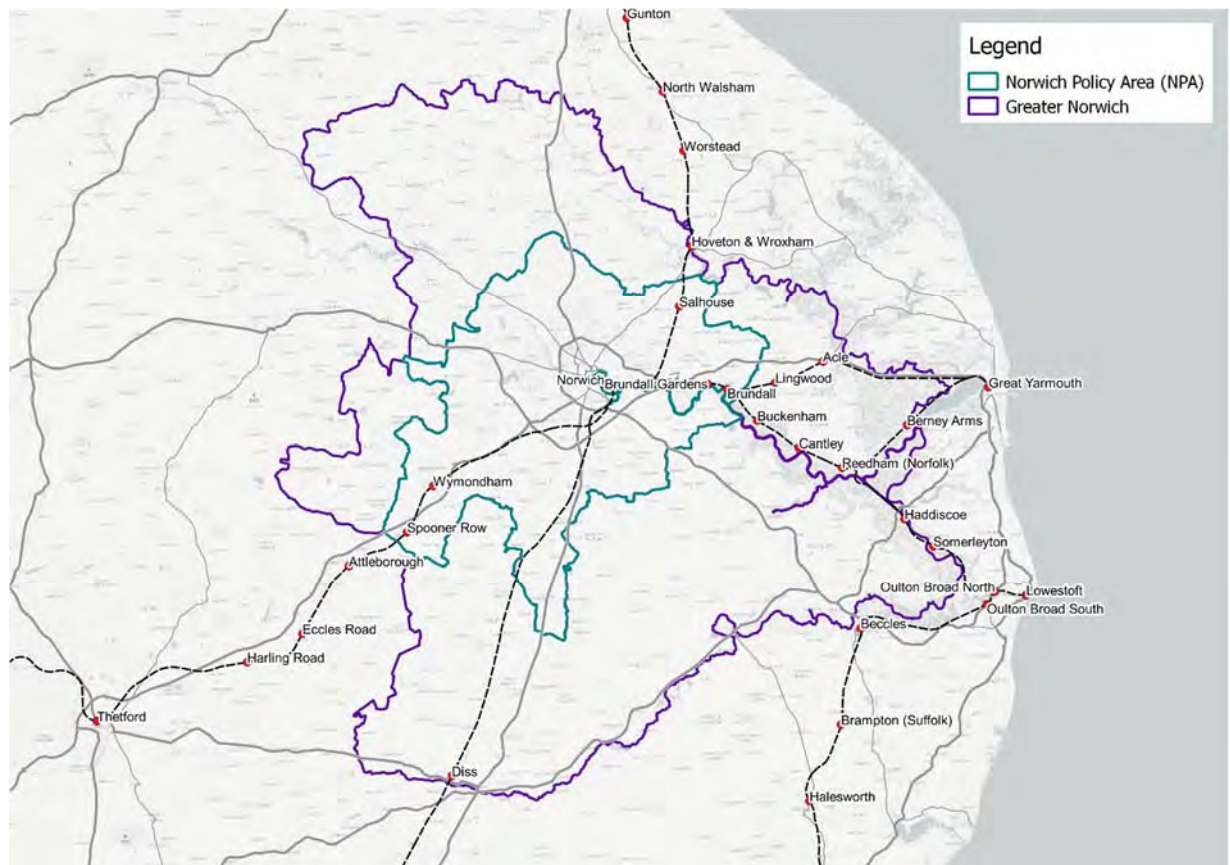
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- 3.12 From Figure 3.3 it is clear that the existing administrative boundary of Norwich City does not reflect the full extent of the city, resulting in large parts of the contiguous urban area falling within Broadland and South Norfolk. This is particularly apparent to the north of the city. One third of Norwich's urban area² (19 sq. km) falls outside of the City Council boundary (primarily in Broadland), accounting for 28% of the Built Up Area's population.

Travel to Work Flows

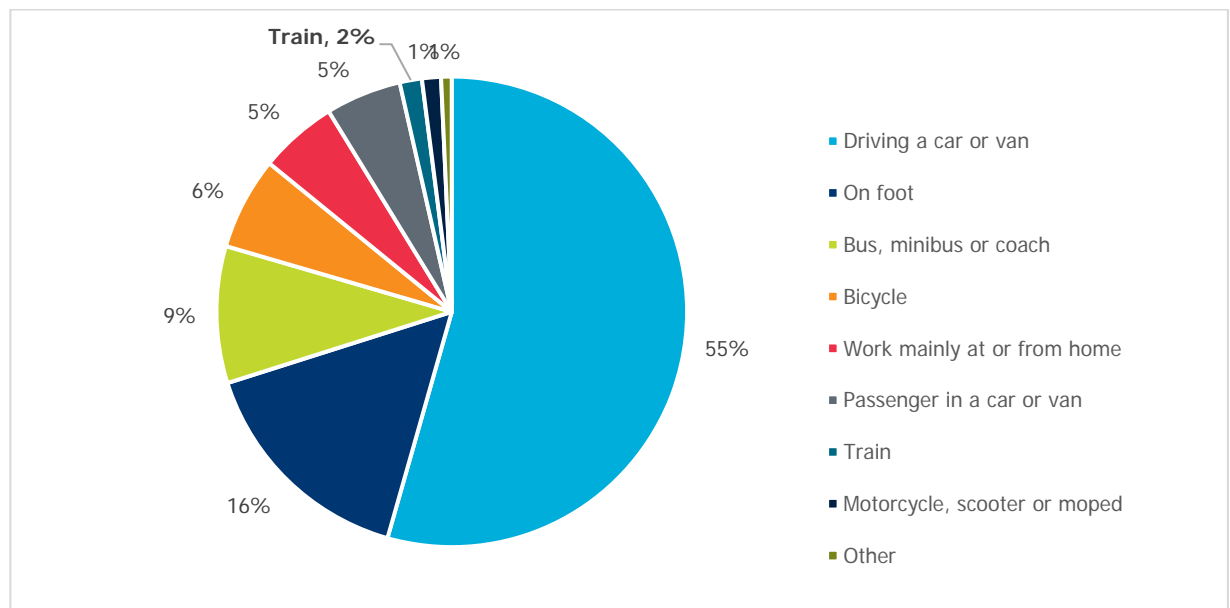
- 3.13 As highlighted in Section 2, spatial planning strategies should promote development in sustainable locations where travel times to employment, education and other services are minimised. Public transport use should also be encouraged. Figure 3.4 below shows the existing rail corridors within the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

² Based on the ONS 2011 Built Up Area Sub-division definition for Norwich

Figure 3.4: Rail Connections

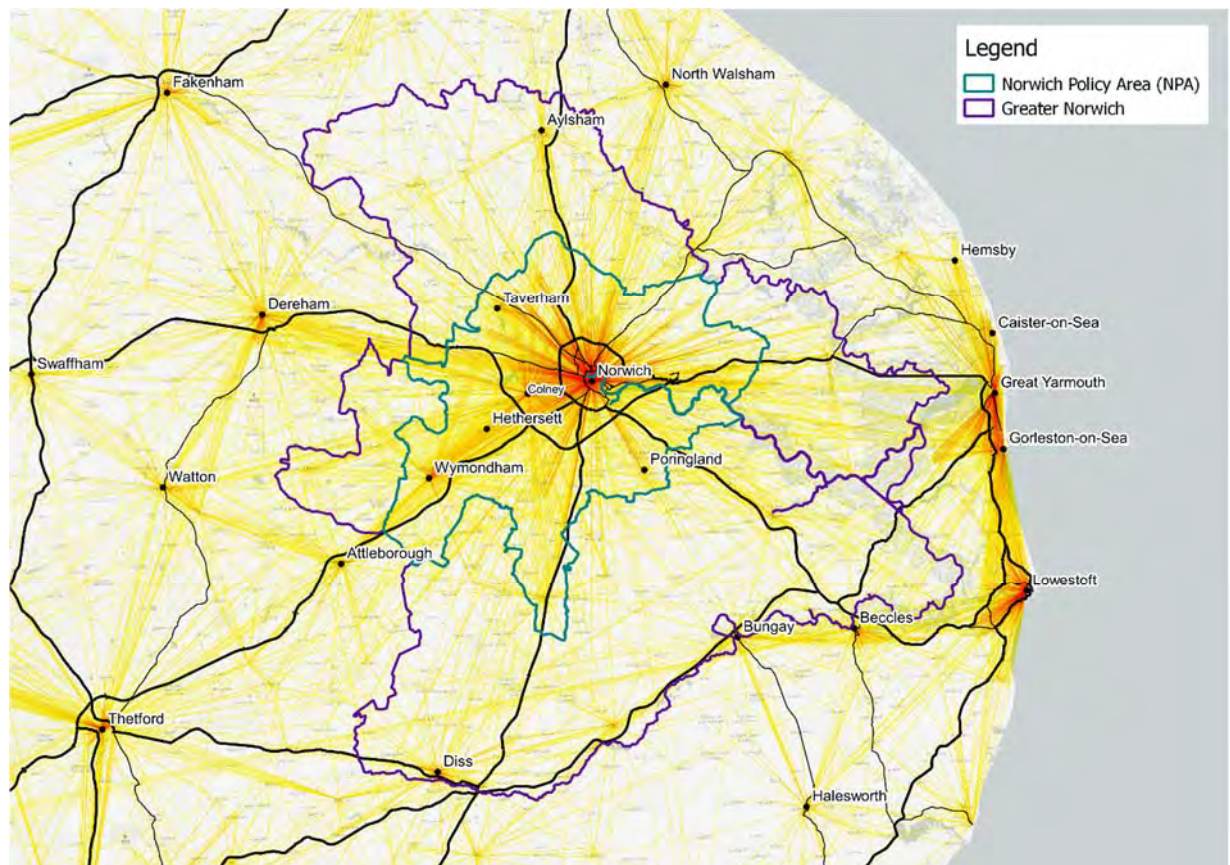
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- 3.14 Norwich serves as a hub for several lines, and benefits from direct links to London and other major destinations in the East of England and beyond. Though there are many stations along the rural lines to the north and east of Norwich, there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

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

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

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

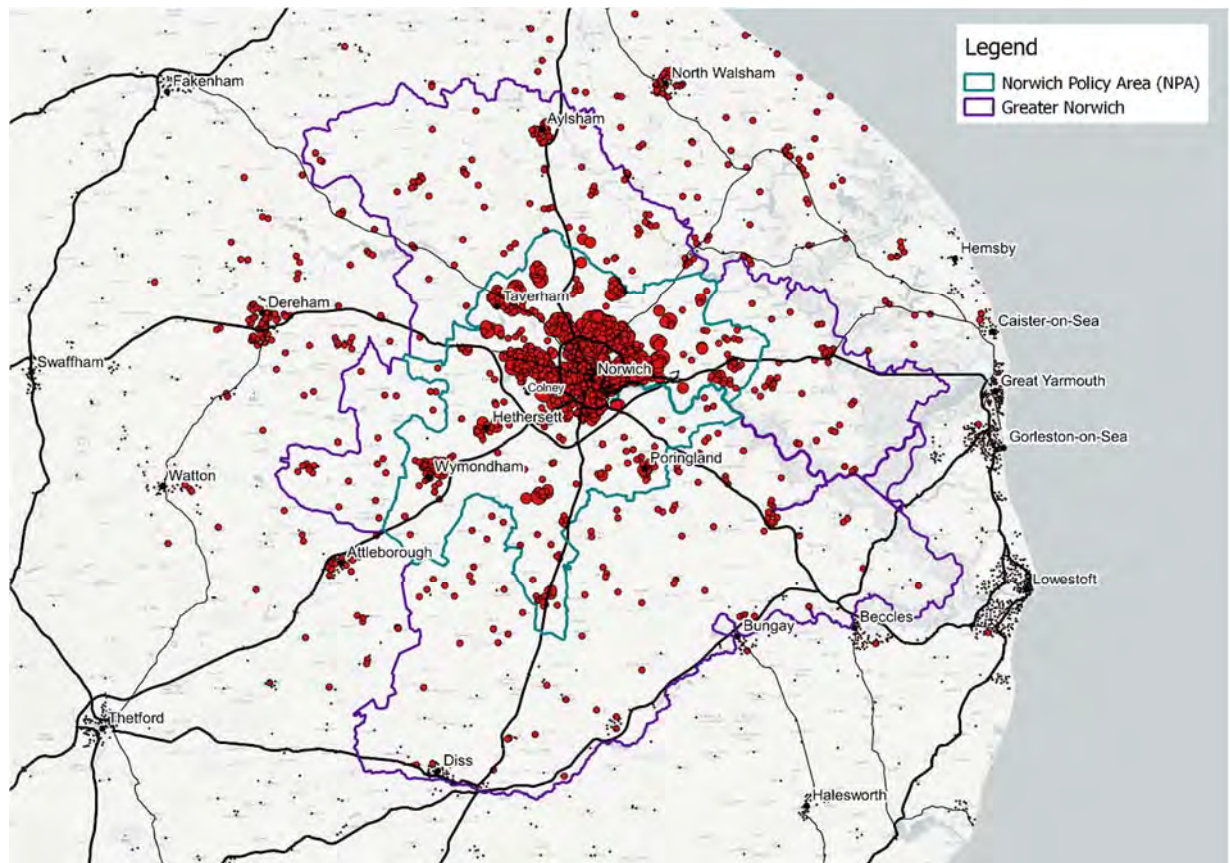
Figure 3.6: Travel to Work Flows

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Source: ONS, Census 2011

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

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

Figure 3.7: Origins of Norwich workers

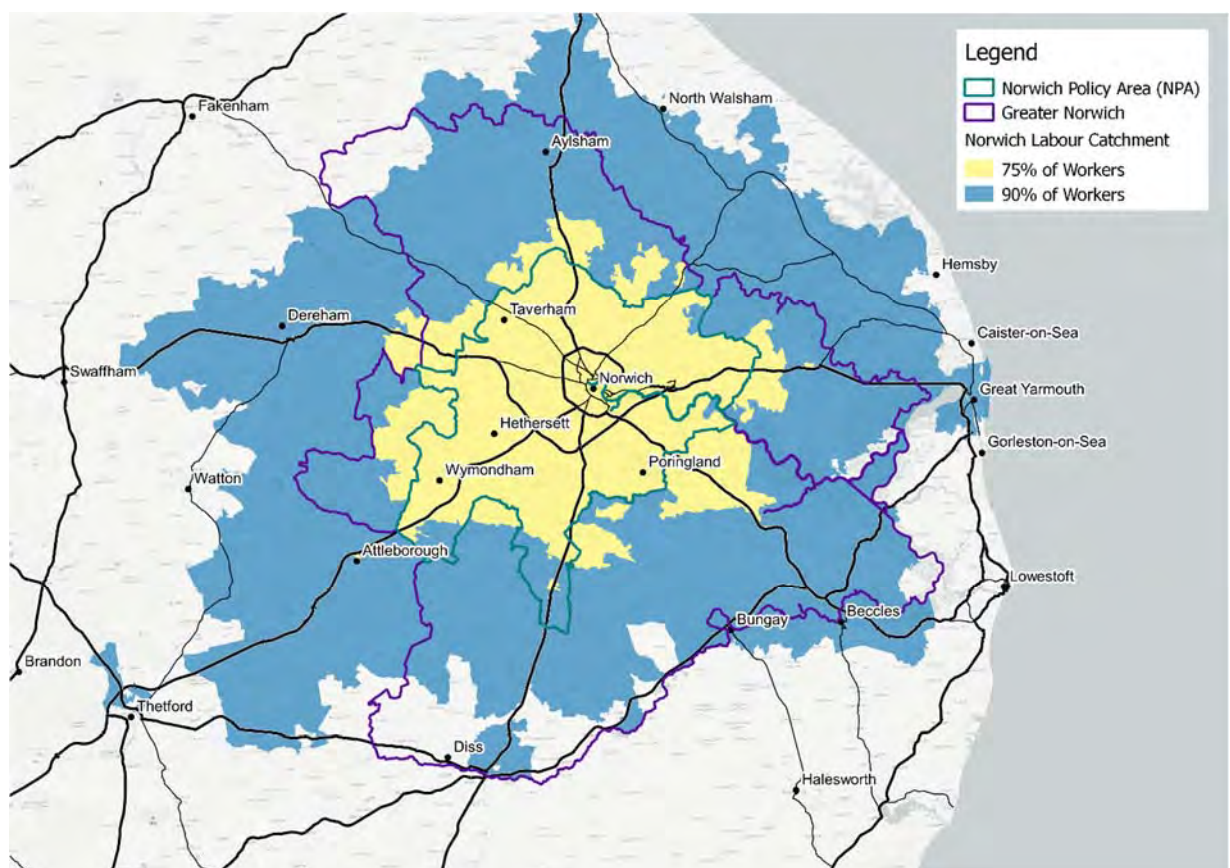


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Source: ONS, Census 2011

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

- 3.25 For each flow originating from an 'output area' (a small unit of geography devised by the ONS statistical purposes) within 90 minutes' drive of Norwich³, the drive time into central Norwich has been calculated. This provides an indication of accessibility, taking into account factors such as availability and quality of infrastructure (i.e. the road network) and physical geography such as rivers, valleys and hills which affect route layout.
- 3.26 Travel to work flows are then ranked, from shortest to longest journey time. Containment thresholds 75% and 90% are then applied to create a 'catchment area' for Norwich's labour force. The 75% catchment area is equivalent to the containment rate of a TTWA (as discussed above). Beyond 90%, flows become more widely dispersed and of less practical use in defining the extent of Norwich's labour market. Figure 3.8 below shows the extend of these zones.

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



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Source: Experian, Off-Peak Drive Time model

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

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

iii) Functional Economic Relationships - Summary

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

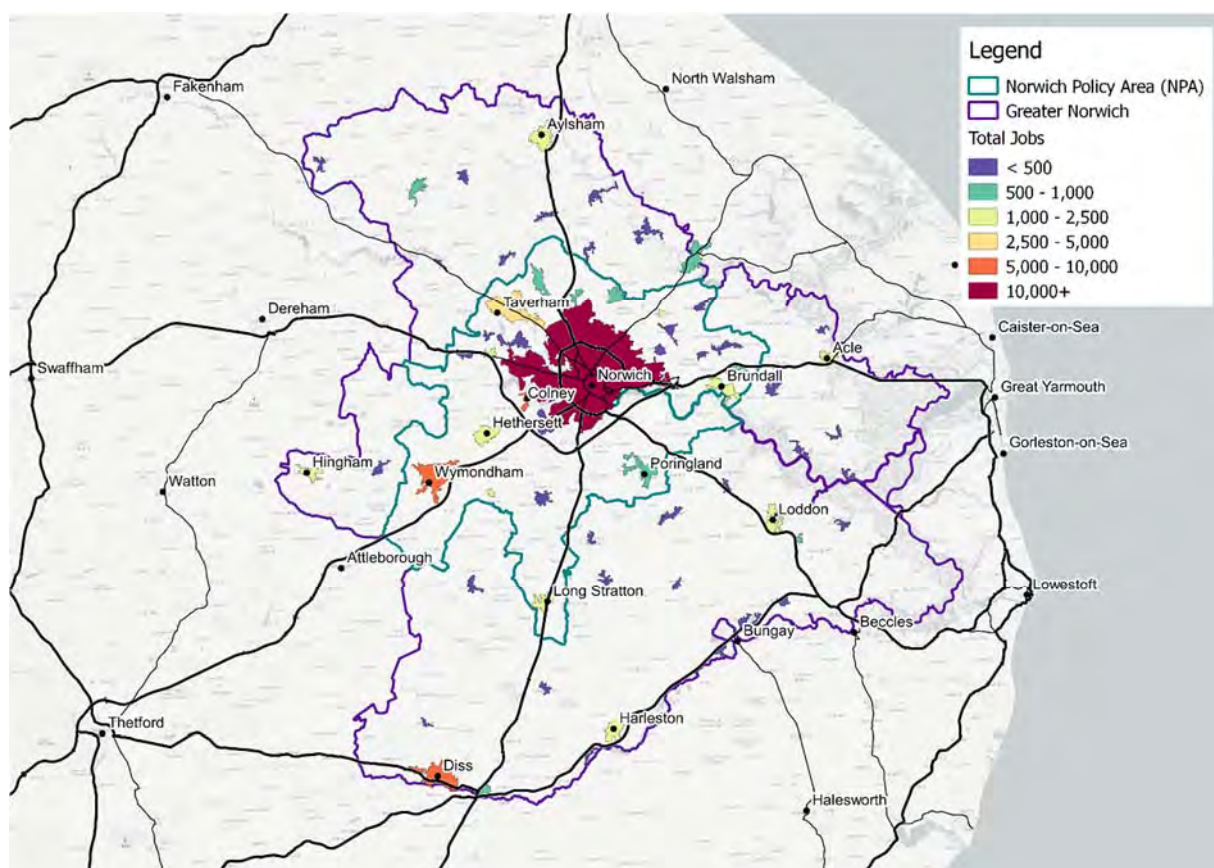
4.0 ECONOMIC OUTLOOK

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

i) Jobs Distribution

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

Figure 4.1: Current Distribution of Jobs



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Source: ONS, Census 2011 (Workplace Data)

4.3 At present, the areas⁴ with the most jobs are in and around the Norwich urban area. This includes areas such as Colney (to the south west of the city, where Norwich Research Park and Norfolk and Norwich Hospital are located). Beyond Norwich and its immediate fringe, the settlements with the largest numbers of jobs are Wymondham and Diss, followed by Taverham.

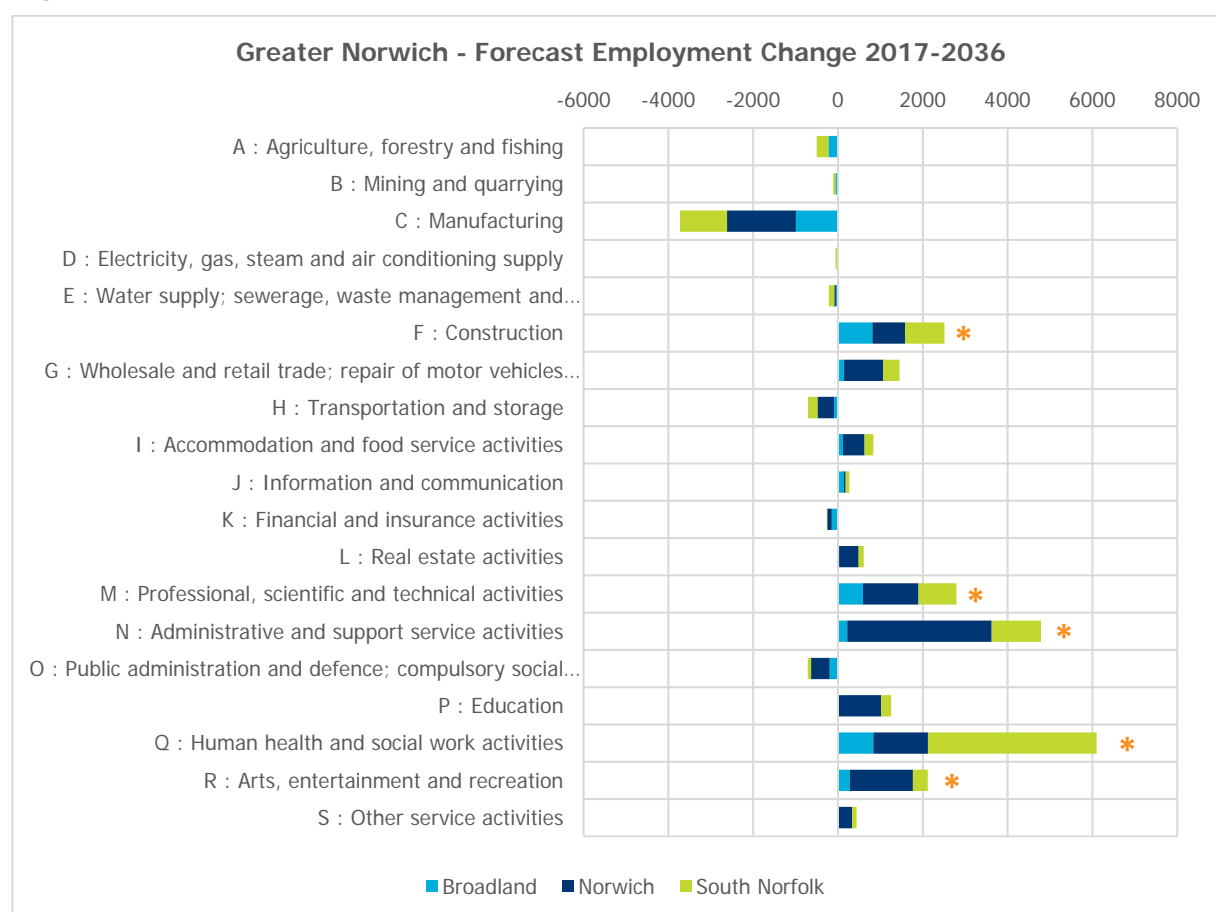
⁴ Built Up Areas and Built Up Area Subdivisions, as defined by the ONS

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

ii) Employment Forecast

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

Figure 4.2: Economic Outlook



Source: Oxford Economics

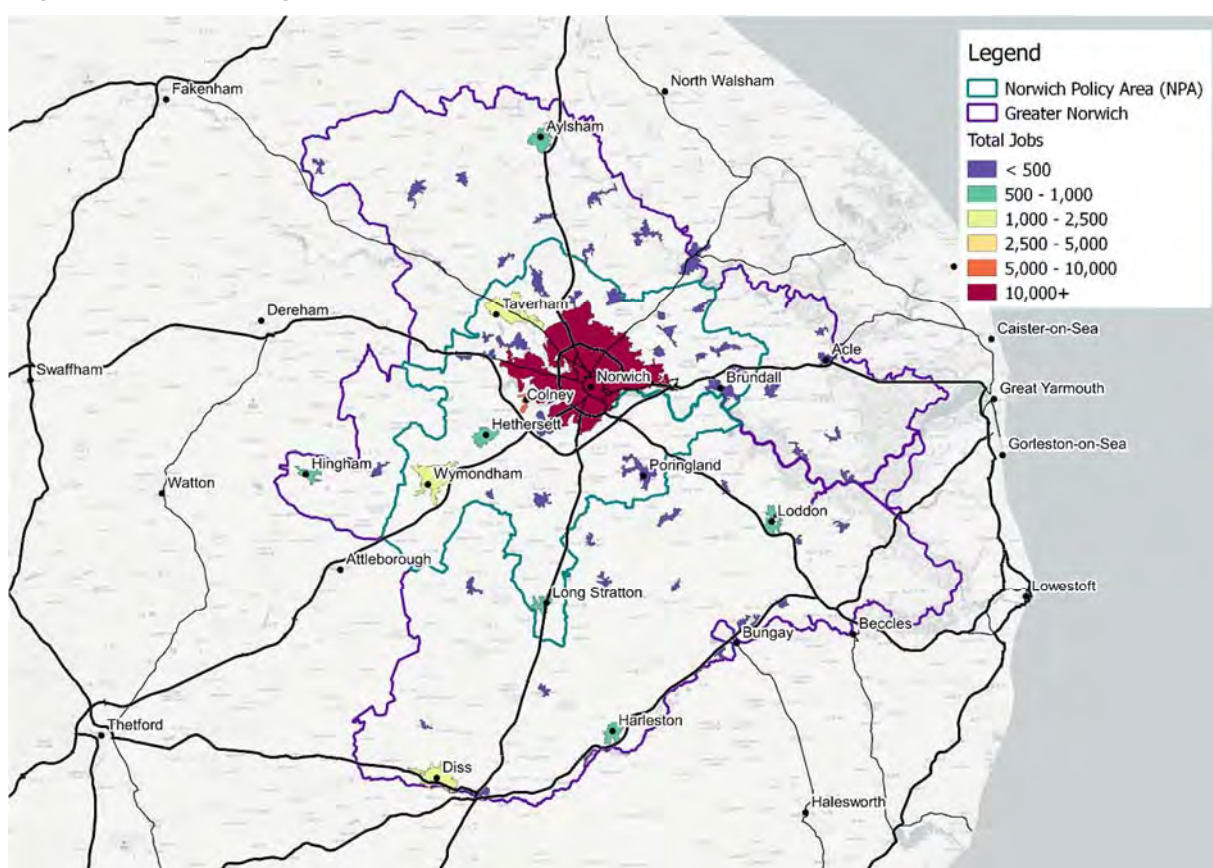
4.5 At the aggregate level, Oxford Economics forecast net growth in employment of c.17,000 over the course of the plan period, including net losses in a number of sectors (most notably Manufacturing – a national trend). The vast majority of jobs are expected to be created in Norwich and South Norfolk,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

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

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

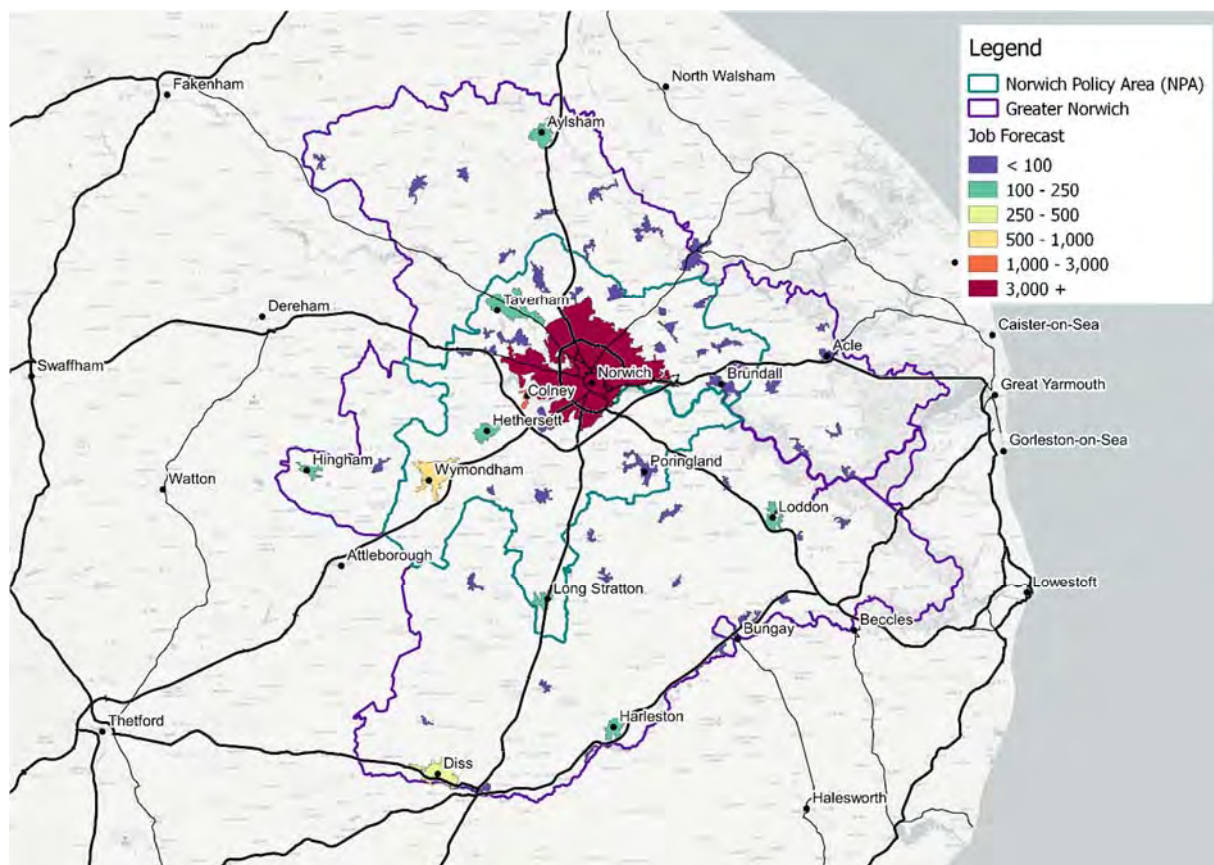
4.7 The current spatial distribution of employment in these five main growth sectors, as observed in the 2011 Census, is shown in Figure 4.3 below.

Figure 4.3: Existing Concentrations of Main Growth Sectors



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Source: ONS, Census 2011 (Workplace Data)

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

Figure 4.4: Forecast Distribution of Main Growth Sectors

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

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

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

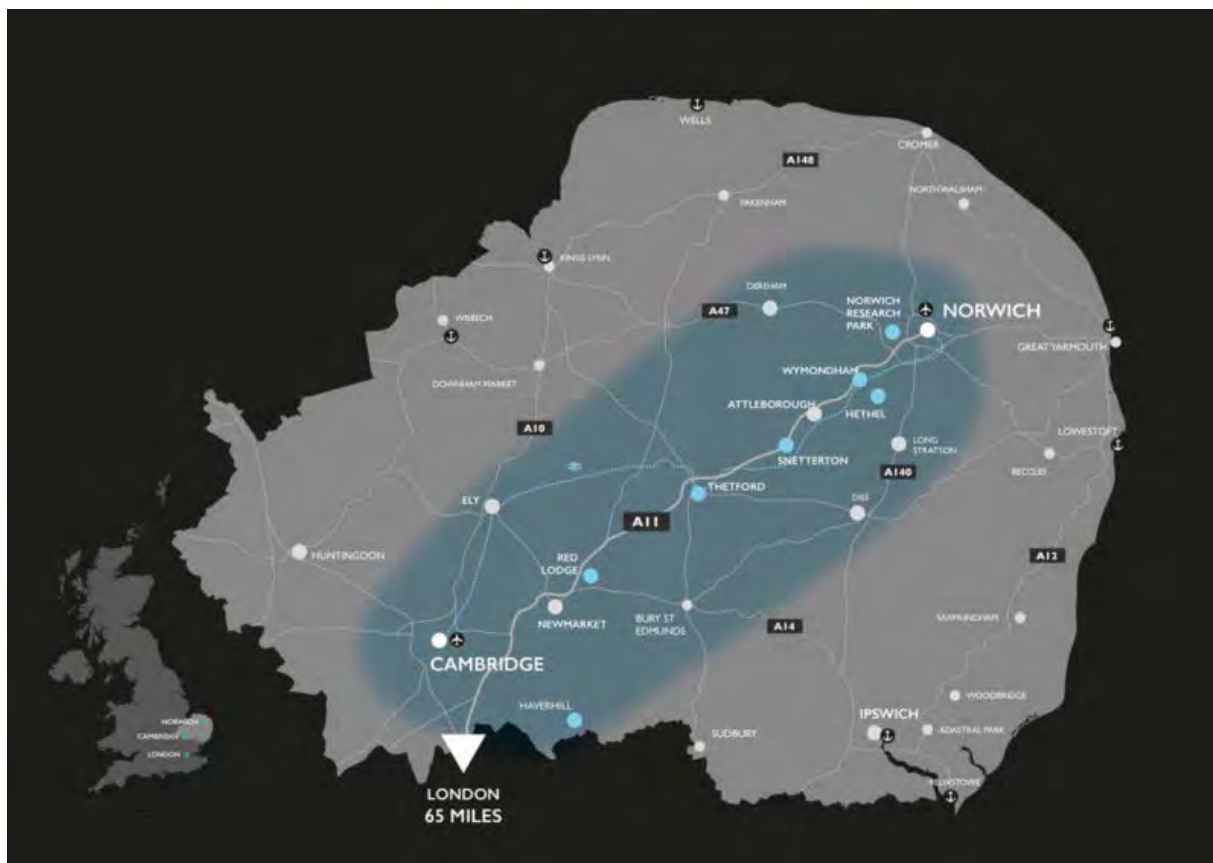
Built Up Area	Total Jobs (All Sectors)	Current Jobs (5 Growth Sectors)	Forecast Job Growth (5 Growth Sectors)
Norwich	114,200	37,100	9,750
Colney	8,700	7,950	2,700
Wymondham	7,200	2,400	700
Diss	5,300	1,650	450
Taverham	3,150	1,500	200
Aylsham	2,350	1,000	150
Long Stratton	2,250	800	250
Hingham	1,100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

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

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

iii) Further Growth Influences

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

Figure 4.5: Extent of the Cambridge Norwich Tech Corridor

Source: Cambridge Norwich Tech Corridor Partnership

- 4.14 In order to achieve this, the initiative aims to facilitate investment in strategic infrastructure (including an upgrade to the Ely North railway junction, which could result in a more frequent rail service along the corridor) and the delivery of 20,000 new homes.
- 4.15 A report in 2015 by Bruton Knowles and AMION Consulting identified that the corridor could create up to 8,700 net additional jobs in high value sectors (in alignment with the New Anglia LEP's economic development objectives), alongside an estimated 5,320 person years of temporary construction employment. This would deliver £558 million net additional Gross Value Added per annum and attract £905 million private sector investment in construction.
- 4.16 More recently, the CNTC initiative has predicted that its plans could create nearly 24,000 jobs⁵ in digital/tech sectors along the route, taking full advantage of its links to one of the World's top universities (Cambridge) and the very high qualification levels of residents (52% being university graduates). Within the GNLp area, the Tech Corridor initiative highlights Norwich Research Park, Browick Road (Wymondham) and Hethel Technology Park as key locations for potential development.

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

4.17 In addition to the Tech Corridor, the GNL area also benefits from the Greater Norwich City deal, which supports the delivery of an estimated 19,000 jobs, including 3,000 high value jobs at the Norwich Research Park⁶.

iv) Economic Outlook – Summary

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

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

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

5.0 CONCLUSION

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

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

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

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

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

APPENDIX 1

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

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Norwich Economic Analysis

Part 1: Norwich Economic Geography

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

June 2017

Contents

1.	Introduction.....	2
2.	Geographies and Context	2
3.	Market Review.....	17
4.	Growth Drivers	23
5.	Conclusions.....	44

Prepared By: Martyn Saunders, Richa Joshi and Zak Vallender

Status: Version 1

Draft Date: June 2017

For and on behalf of GVA Grimley Limited

1. Introduction

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

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

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

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

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

2. Geographies and Context

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

Figure 1: Norwich Location and Strategic Connections



Key

-  Main Roads
-  Motorways
-  Rail Links

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 Broadland District Council – 100022319
 Norwich City Council – 100019747
 South Norfolk District Council – 100019483

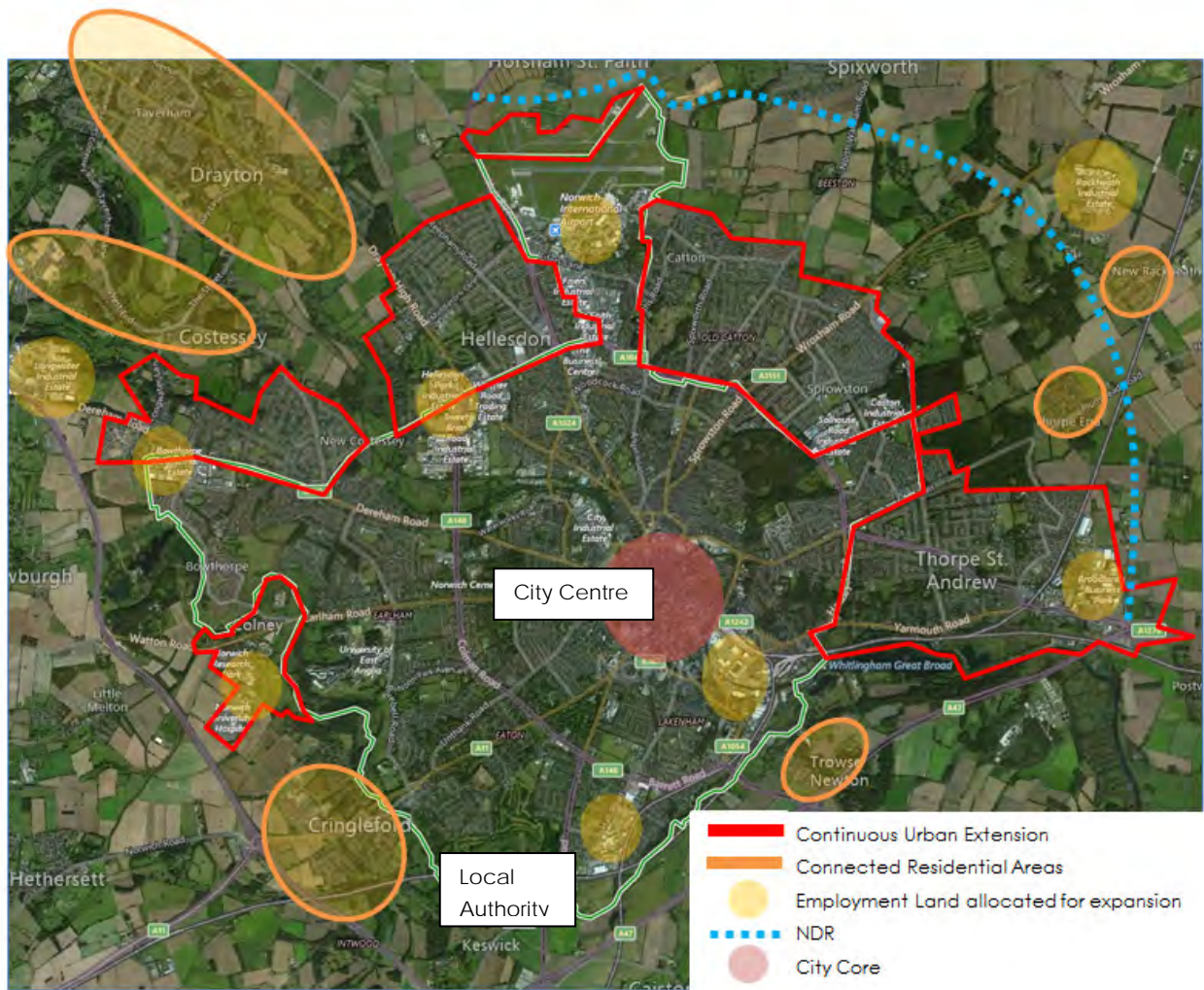
September 2009

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

Norwich City centre, Local Authority Boundary and Beyond

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

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



Source: Bing, 2017.

Norwich Policy Area

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

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

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

Figure 3: Norwich Policy Area

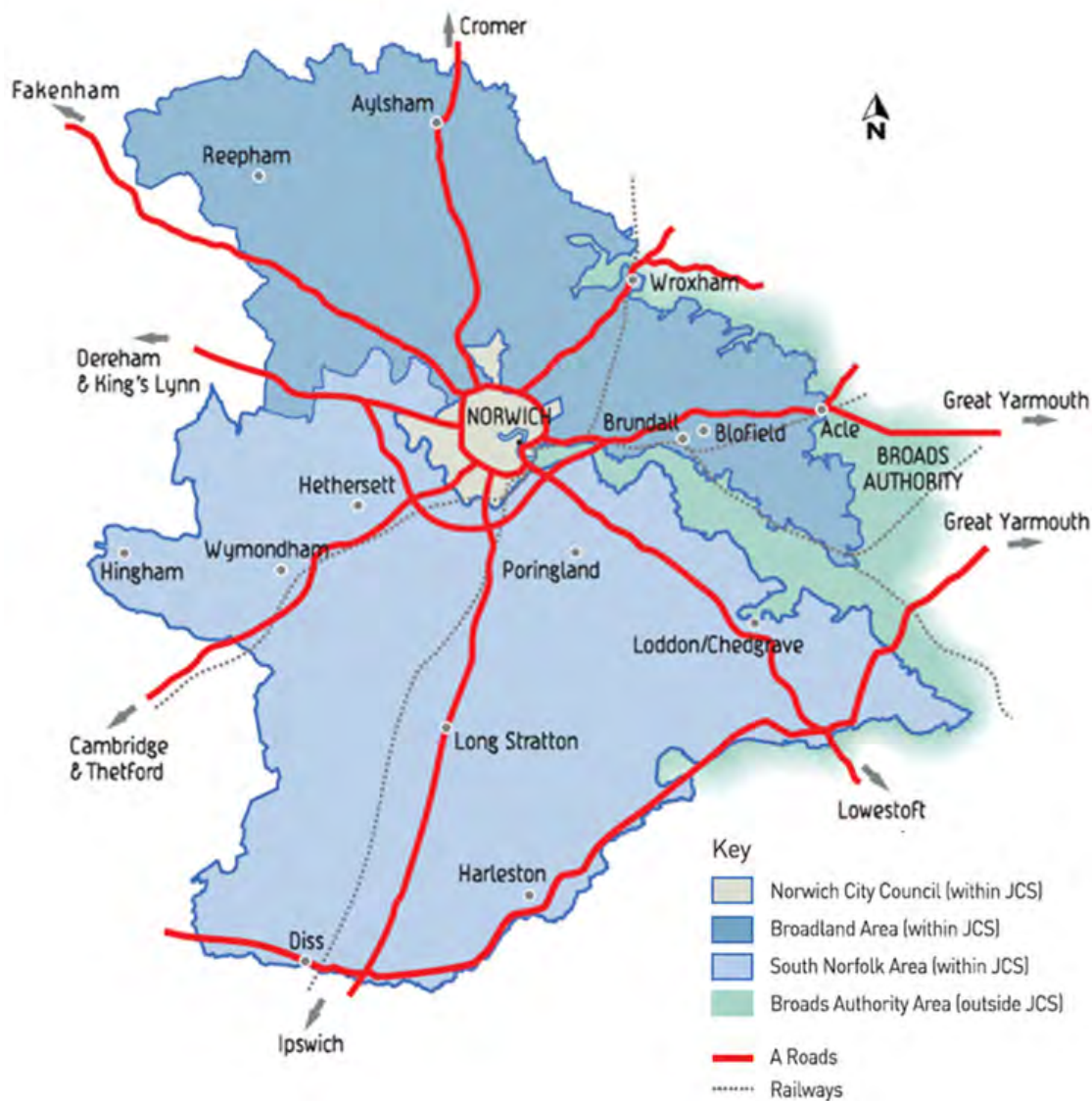


Source: Norwich City

Greater Norwich

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

Figure 4: Joint Core Strategy Area



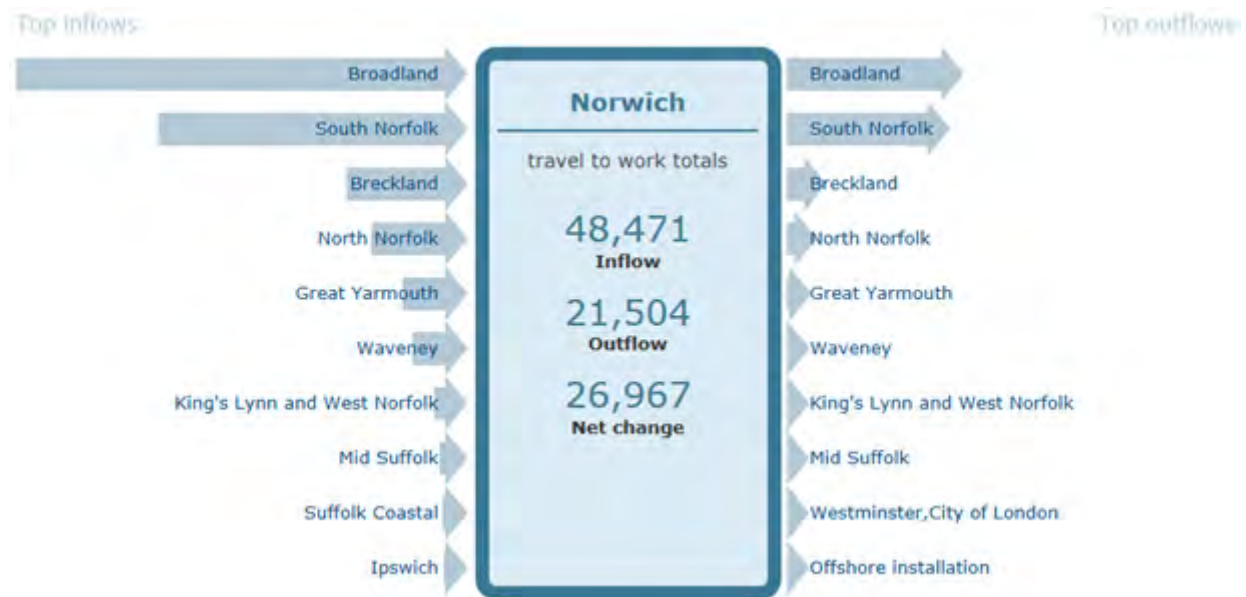
Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

Norwich Travel to Work Areas

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

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

Figure 5: Norwich Travel to Work Flows

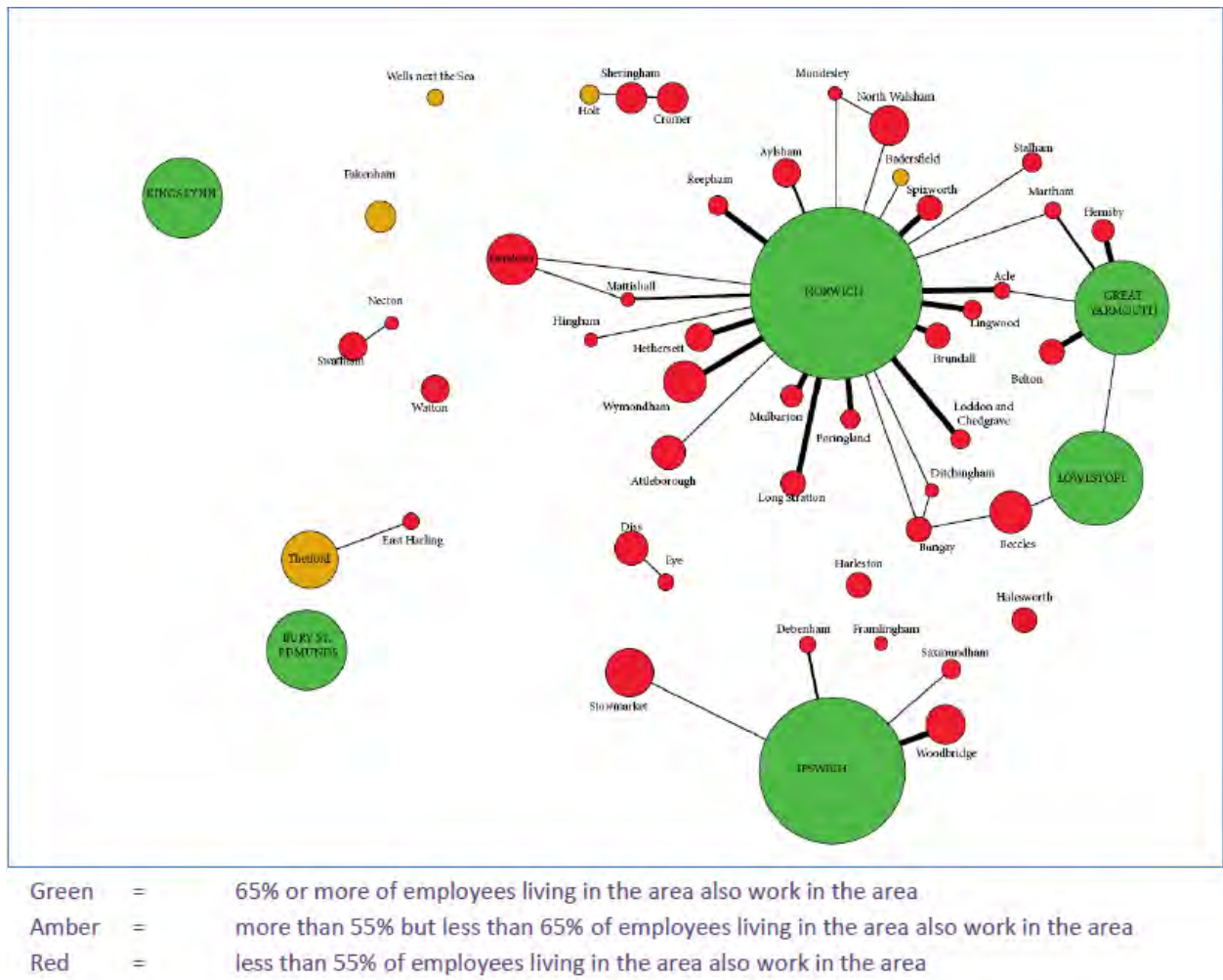


Source: Census, 2011

- 2.17 Figure 6 shows functional relationships based on 2001 origin-destination data (2011 data is currently safeguarded for small areas). Drawn from the 2016 Central Norfolk SHMA, the size of the urban centres (the coloured circle) is proportional to the number of workers who live within the area. The more workers, the larger the circle; hence Norwich is the largest circle.
- 2.18 The links that exist between the urban centres are also illustrated by the joining lines, with stronger links having heavier lines. The thickness of the line does not simply represent the number of workers, but it is based on a 'score' that is based on the strength of the connection when taking into account the number and the proportion of the resident and workplace populations in both areas.
- 2.19 The figure shows that Norwich has strong labour connections with 11 proximate settlements¹ and functions as part of a wide and partially interconnected network. Norwich is the prime employer in the Central Norfolk study area and provides jobs for an extensive catchment that includes settlements across Greater Norwich and outside it.

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

Figure 6: 2001 small area functional relationships



Source: Central Norfolk Strategic Housing Market Assessment, 2016

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

Figure 7: Norwich Travel to Work Area



Source: Norwich Local Economic Assessment, 2015

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

Norwich Broad Rental Market Area and Housing Market Area

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

Figure 8: Central Norfolk and Norwich Broad Rental Market Area

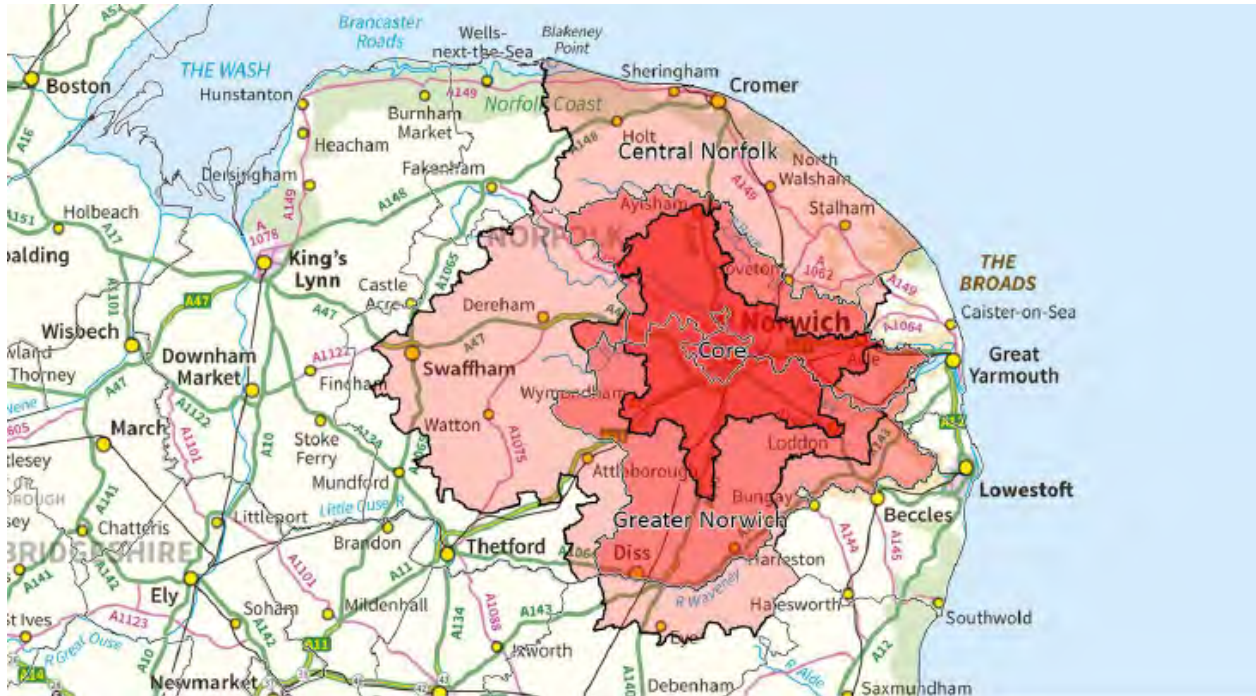


Source: Norwich Local Economic Assessment, 2015

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

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

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



Source: Central Norfolk Strategic Housing Market Assessment, 2016

Section Summary/Findings

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

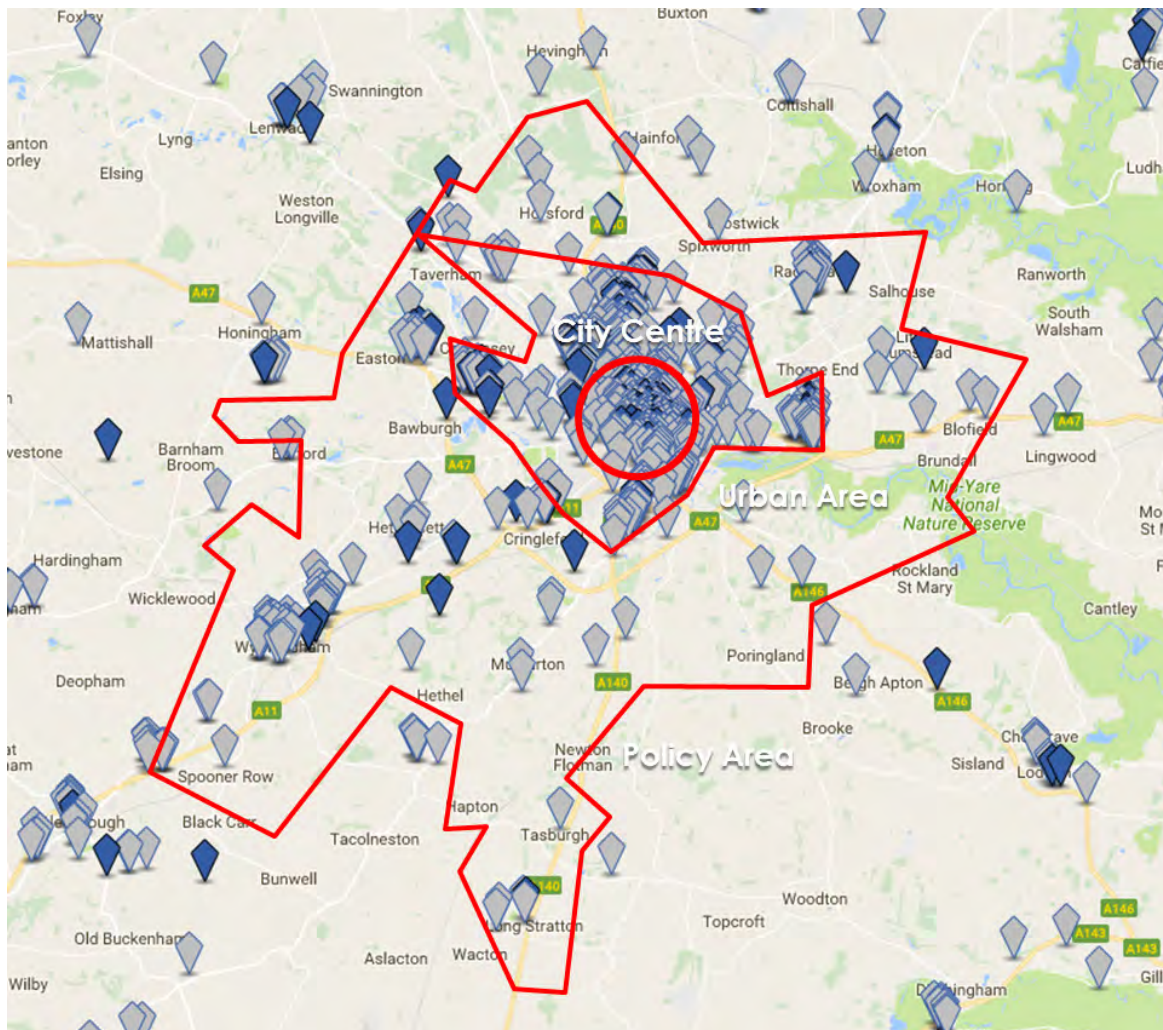
neighbouring centres and HMA shows, Norwich is most strongly connected to settlements and development sites within this area. Unlike the local authority and Greater Norwich areas, the NPA is therefore shown to be of an agreeable size that enables detailed and commensurate analysis. Moreover, the NPA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

3. Market Review

Commercial Market

- 3.1 This section provides a review of the property geographies within the NPA reference geography as designated within the previous section. To undertake the analysis we have compared NPA with the city centre and “urban area” as shown in Figure 10. It reviews total quantum, vacancy levels, rents, and net absorption as a measure of market activity. An extensive baseline analysis is available for the Norwich local authority area and neighbouring local authorities as part of the Greater Norwich Employment, Town Centres and Retail Study.
- 3.2 Figure 10 shows that the majority of commercial buildings are concentrated in the Norwich urban area with heightened concentration in the city centre. Outside of the urban area, commercial buildings are primarily located in key business and industrial sites which are reviewed in the following growth drivers section.

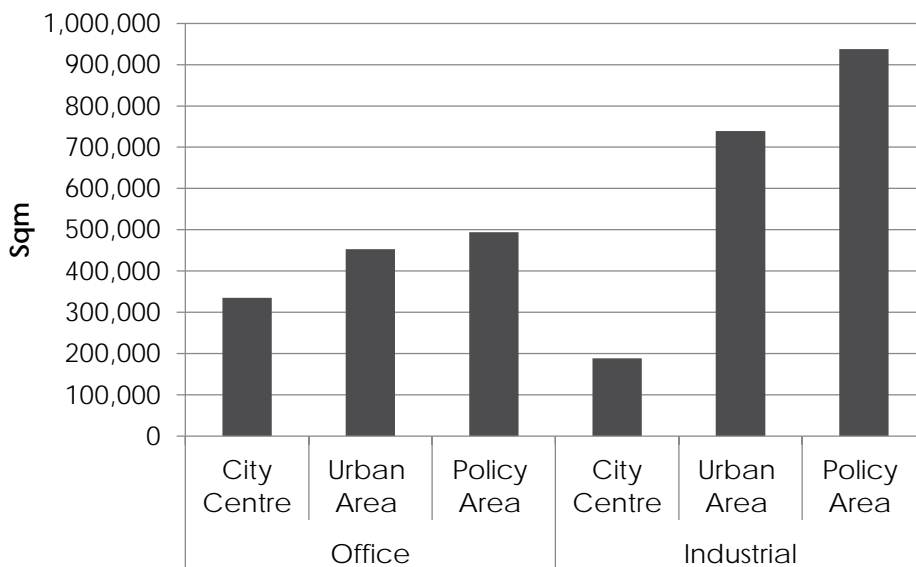
Figure 10: Commercial Properties within Norwich Policy Area



Source: Costar, 2017

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

Figure 11: Existing Floorspace



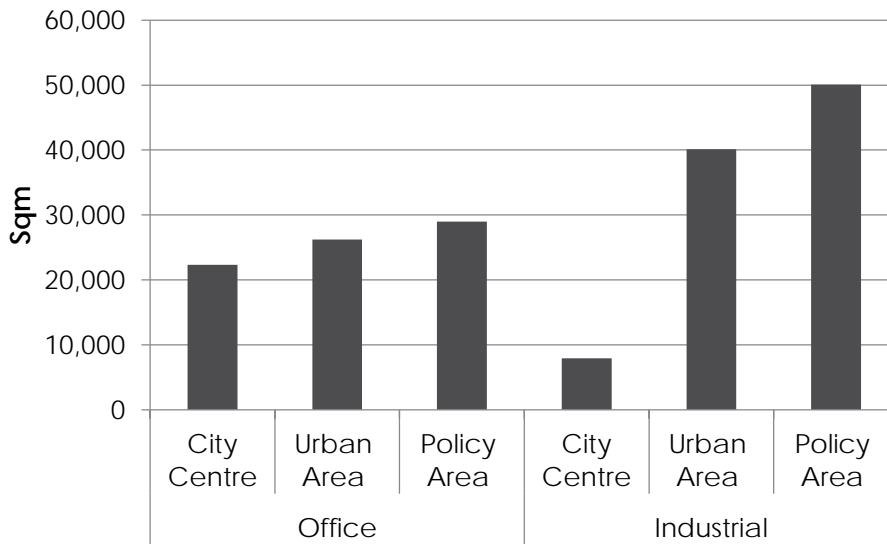
Source: Costar, 2017

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

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

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

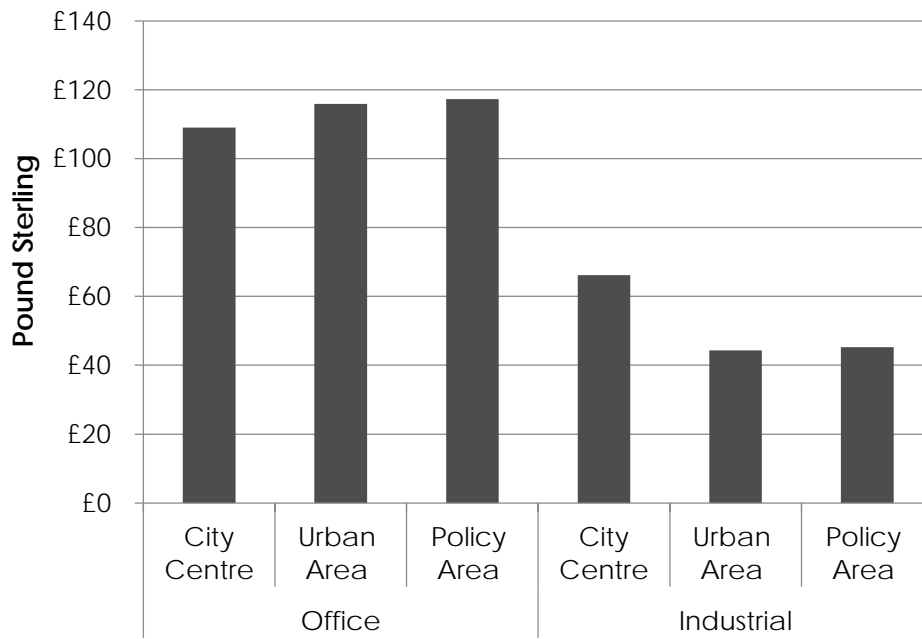
Figure 12: Vacant Floorspace



Source: Costar, 2017

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

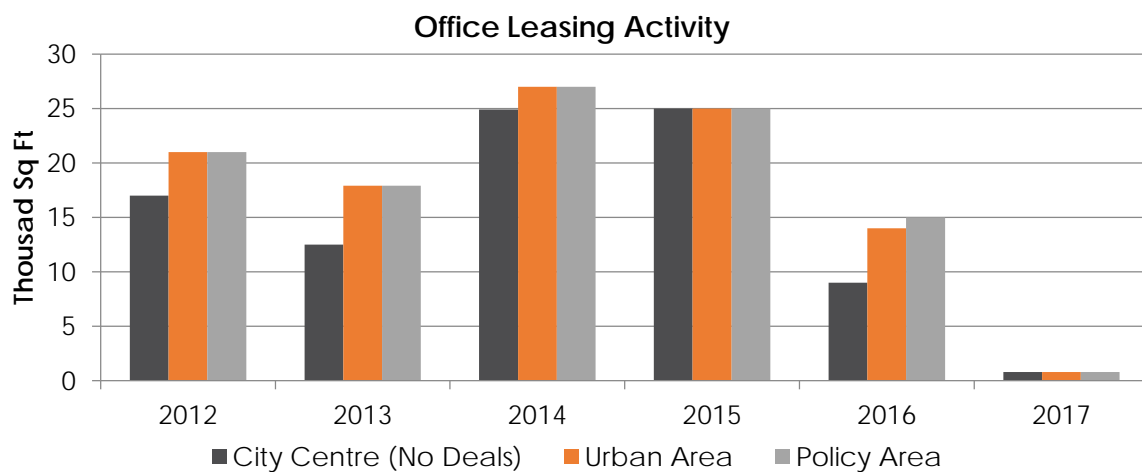
Figure 13: Rents per sqm



Source: Costar, 2017

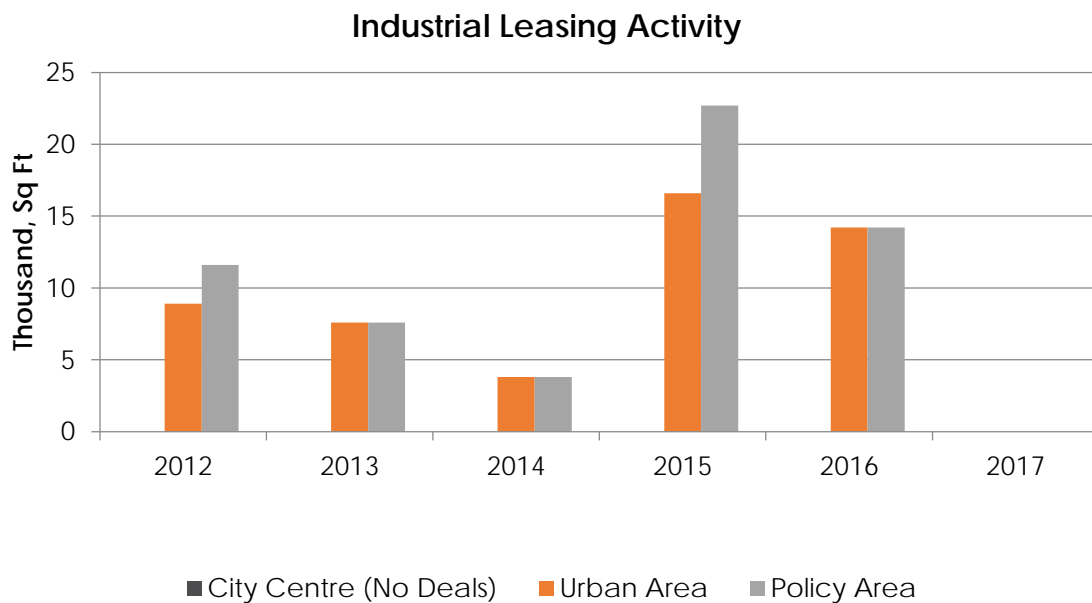
3.8 **Leasing Activity:** Figure 14 and Figure 15 shows leasing activity trends in Norwich for both office and industrial market. Leasing within the office market has fluctuated in recent years with a significant fall in 2016 across the three geographies. This fall may not necessarily be representation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

Figure 14: Office Leasing Trends by Year



Source: Costar, 2017

Figure 15: Industrial leasing Activity by Year



Source: Costar, 2017

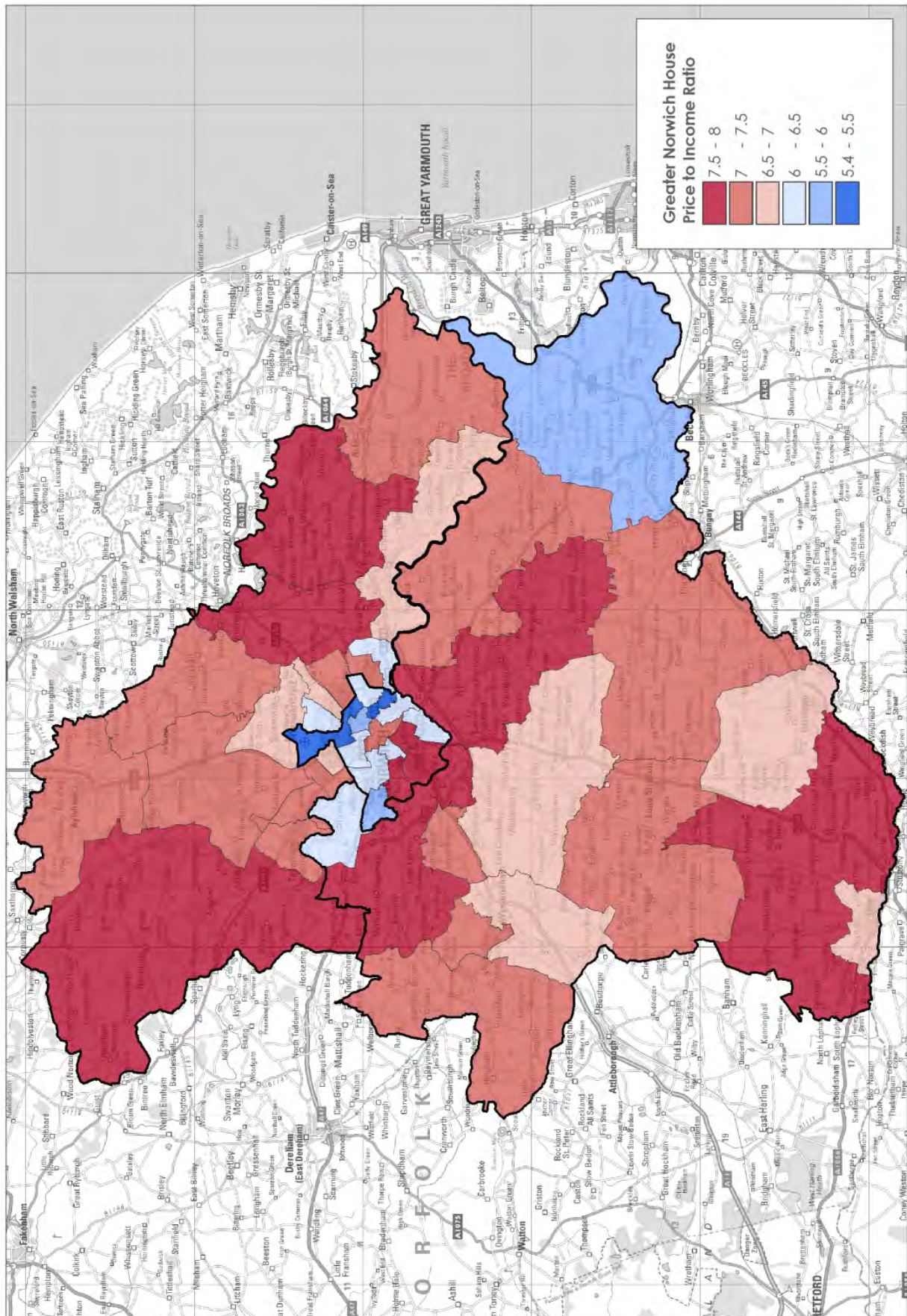
- 3.9 Overall the property analysis above suggests a lower demand for office space than industrial space across the NPA which is particularly acute in the city centre. Although a long term trend is difficult to pinpoint, there does appear to be some reduced activity in the office market. Examples such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

Housing Market

- 3.10 Alongside the geographies of commercial property floorspace and cost, house price affordability is also of interest because it reflects how well a local economy is doing, how desirable an area is, whether there may be affordability issues for attracting talent, and is comparable across the country. In Lloyds Bank's 2017 housing affordability report², Norwich's housing market was ranked the 15th most expensive in the country. Norwich is therefore considered a desirable place to live and work, which is also reflected in its large HMA catchment as discussed above.
- 3.11 Figure 15 below shows housing affordability in postcode areas across Greater Norwich. It shows that the most affordable locations are primarily located in the Norwich urban area, the highest value postcodes in Norwich are those to the south west. These value dynamics are driven by a complex range of inter-related factors including stock typology and age, mix of housing tenures, amenities and transport provision, quality of environment etc.

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

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



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

Source: GVA, ONS, 2017

4. Growth Drivers

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

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

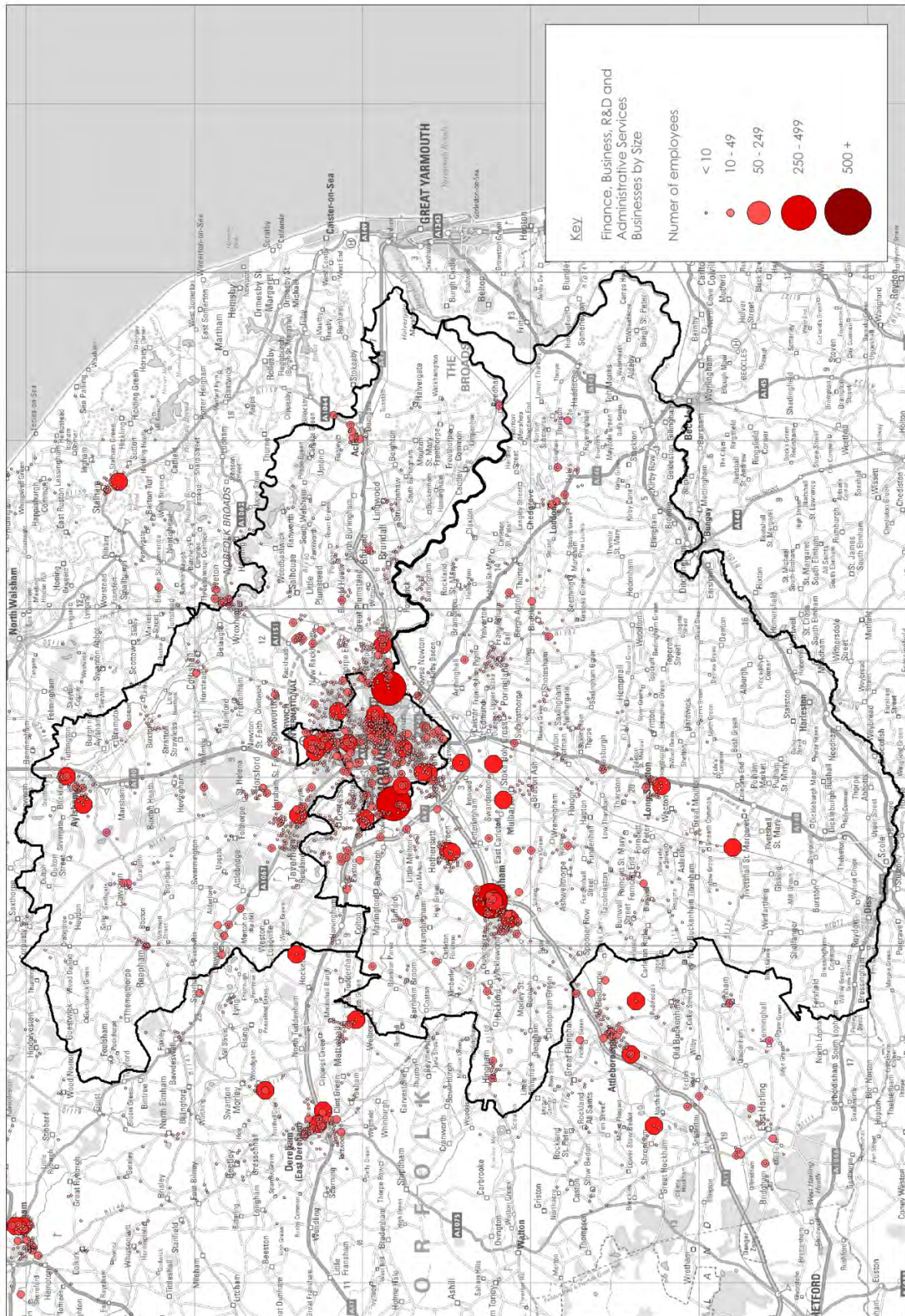
- Growth Locations
 - Norwich Research Park/ Cringleford
 - Broadland Business Park
 - Old Catton Sprowston, Rackheath, St Andrew Growth Triangle
 - Longwater/ Easton/ Cotessey
 - Wymondham and Hethel
 - Hethersett
 - Long Stratton
 - Norwich Airport
 - Norwich Urban Area
- Key Infrastructure
 - Northern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

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

Growth Locations

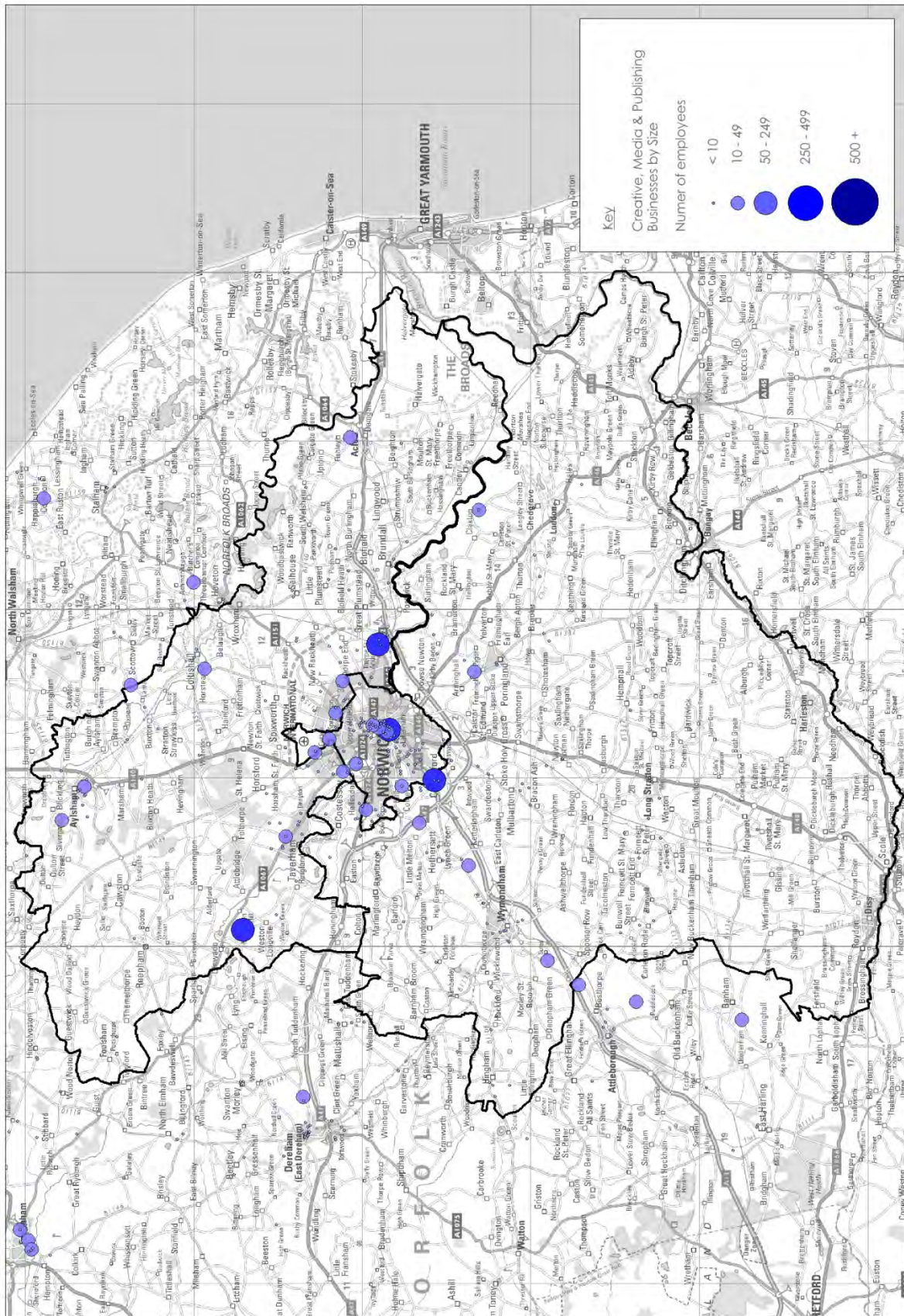
- 4.4 Growth locations are the hubs or nodes within a cluster, which forms a local economic area, where the majority of economic and commercial activity takes place. These centres typically attract the co-location of businesses, jobs and homes and therefore form the principal economic drivers of the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

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



Source: EGi, 2017

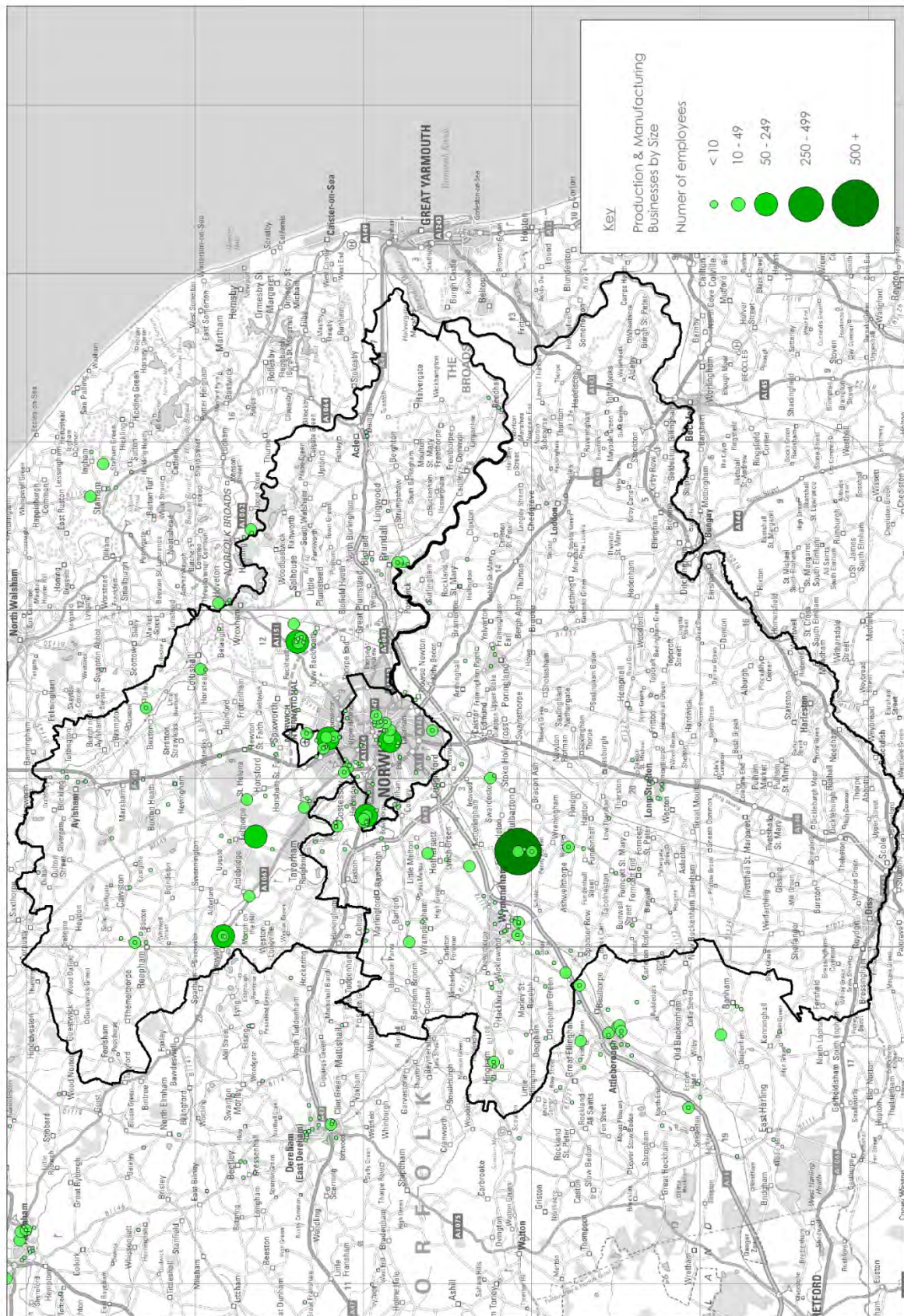
Figure 18: Business unit count based on number of employees: Creative, Media and Publishing Businesses



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

Source: GVA, EGi, 2017

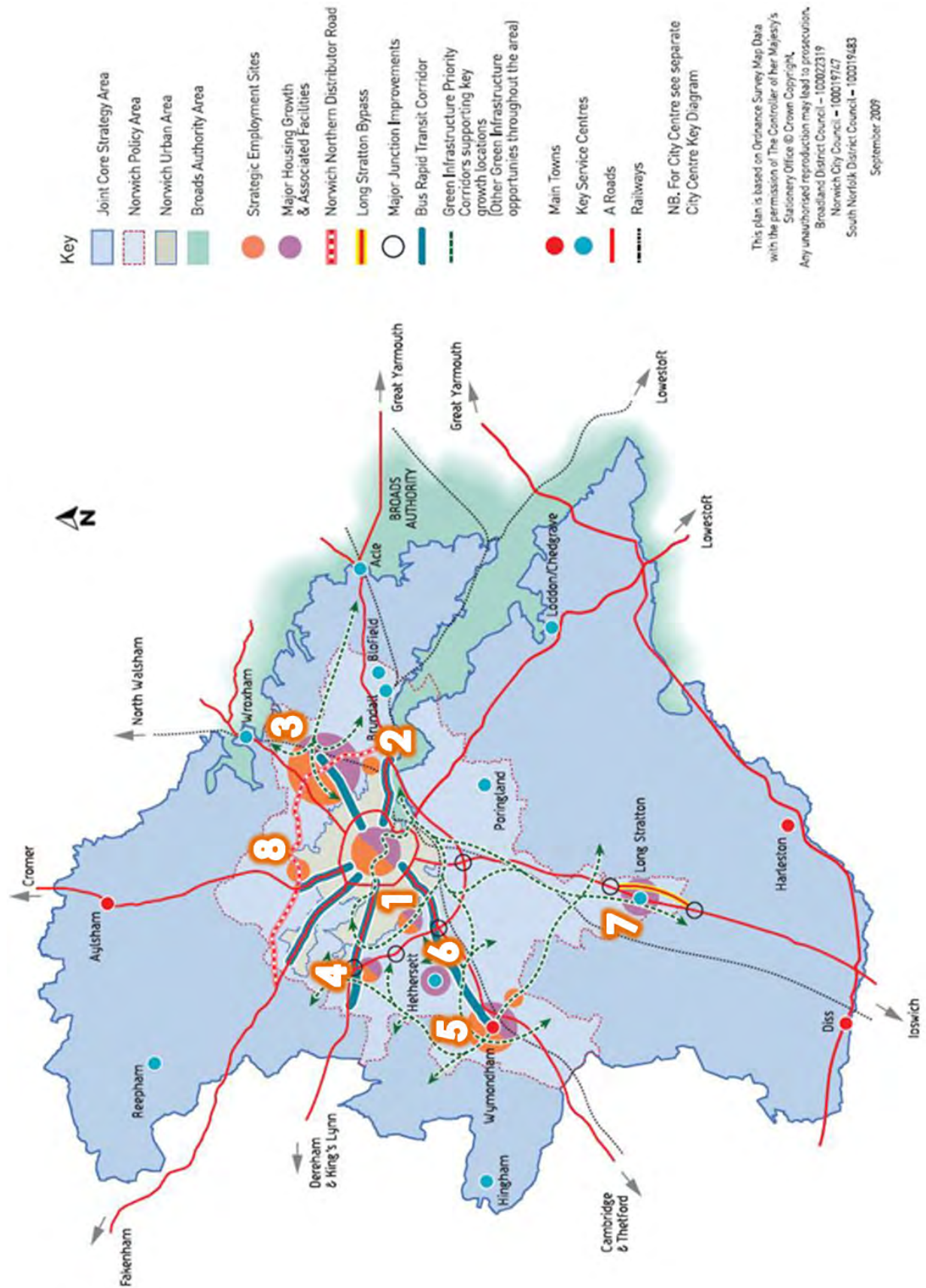
Figure 19: Business unit count based on number of employees: Production and Manufacturing Businesses



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

Source: GVA, EGi, 2017

Figure 20: Existing Major Growth Locations



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

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

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

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

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

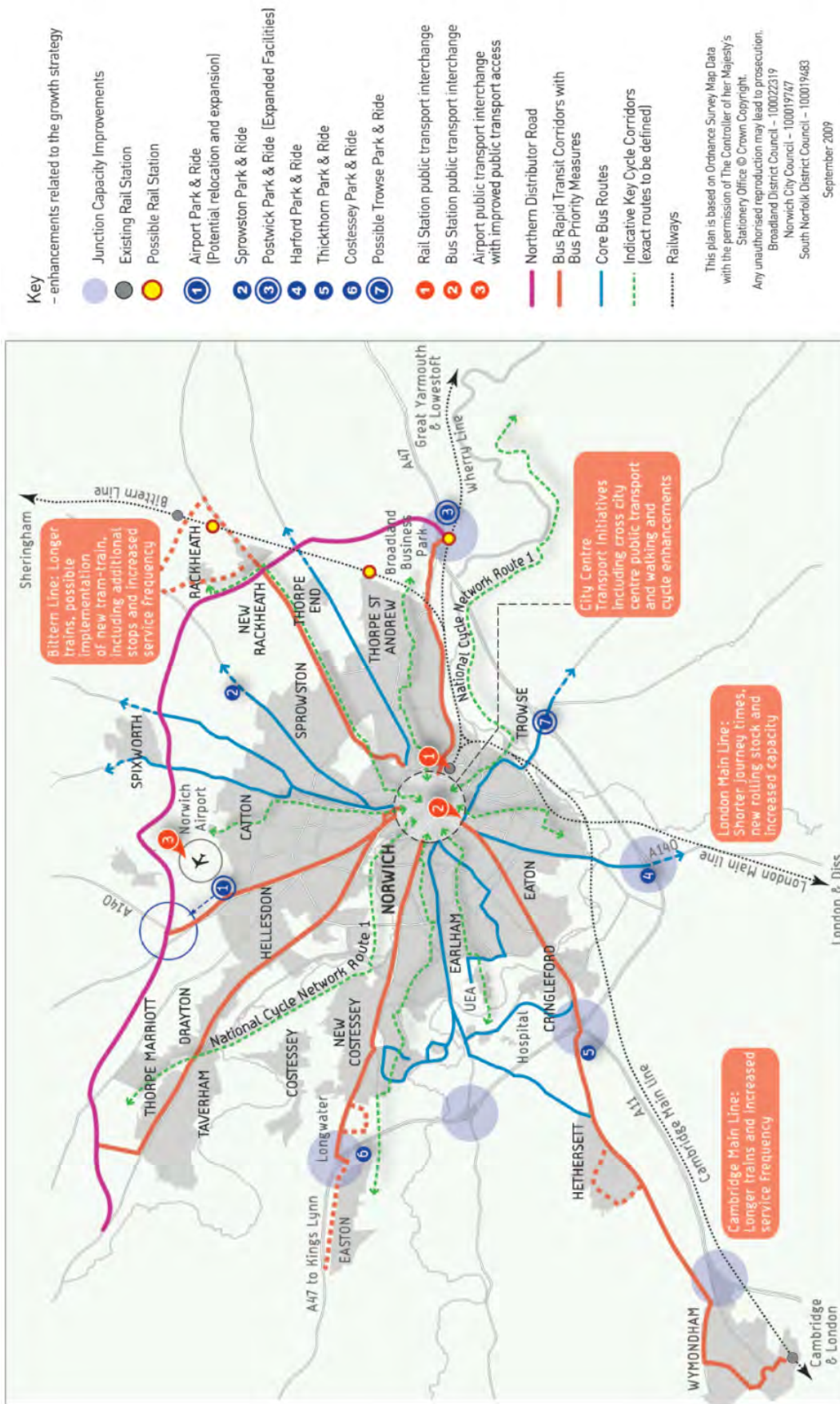
Ref No	Growth Location	Description	Infrastructure Influence	Priority Growth Sectors
		Technology Park is planned for Hethel.		
6	Hethersett	<ul style="list-style-type: none"> Hethersett is a large village located to the south west of Norwich following the A11. The Hethersett North masterplan is expected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

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

Key Infrastructure

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

Figure 21: Norwich Area Transportation Strategy – proposed implementation plan



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

Table 2: Key Infrastructure and growth Locations

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

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

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

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

Game Changer: East-West Rail

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

Figure 22: East West Rail Routes



Source: Network Rail, 2017

City centre

- 4.9 The Norwich city centre is the primary employment centre in the Norwich economy. As shown in the property section, the city centre accommodates 68% of the existing floorspace in the NPA and a sizeable amount of industrial floorspace. The core is home a variety of businesses, particularly those within finance and knowledge intensive businesses (KIBs). Further, the core is seeing growth with 100,000m² of office floorspace proposed for the city centre³.
- 4.10 The city centre is also a hub for education and the arts based around the City College, and the Norwich University of the Arts with wider provision, including Easton & Otley College, in the city's rural hinterland. These institutions are critical to supplying the city with a skilled labour force across a range of sectors, including the KIBs, technology and food/land based science and research
- 4.11 Norwich University of the Arts provides a strong supply of graduates in video games art, design, digital photography, and film, underpinning the strength of the local digital technology sector.
- 4.12 The University of East Anglia, is a critical asset to the Norwich economy, attracting students from across the UK and internationally. It provides market leading research and development activity in a range of core growth sectors including environmental science and climate change, health, food science and digital technology and is a key supporting factor in promoting the city on the international stage. Its specialisms in the life and health sciences in particular underpin major links to other hubs such as Cambridge, helping support a wider ecosystem of activity.
- 4.13 Teaching activity in fields such as legal and accounting, computer science, software engineering and film, television and media studies all provide a strong workforce for businesses located in (or seeking to locate in) the city.
- 4.14 A talented labour pool is not only important for meeting the needs of businesses but also helps to contribute to the amenities and services that make a place desirable to live and work. As is shown in the property section, Norwich is one of the most desirable places to live in the UK and this is the result of such amenities as well as factors such as access to good jobs. The city has an historic character, which is supported by the prominence of the Norman castle and cathedral, as well as a strong retail and leisure offer than includes a series of independent stores set within the Norwich lanes. The strength of these amenities was acknowledged within the winning of the Great British High Street Award in 2014 in the city category.
- 4.15 Such amenities are valued for attracting skilled labour and retaining graduates who are some of the most mobile in the UK labour force. However, the city centre has been struggling in recent years to retain office occupancy levels as shown in the property section of this report, albeit some

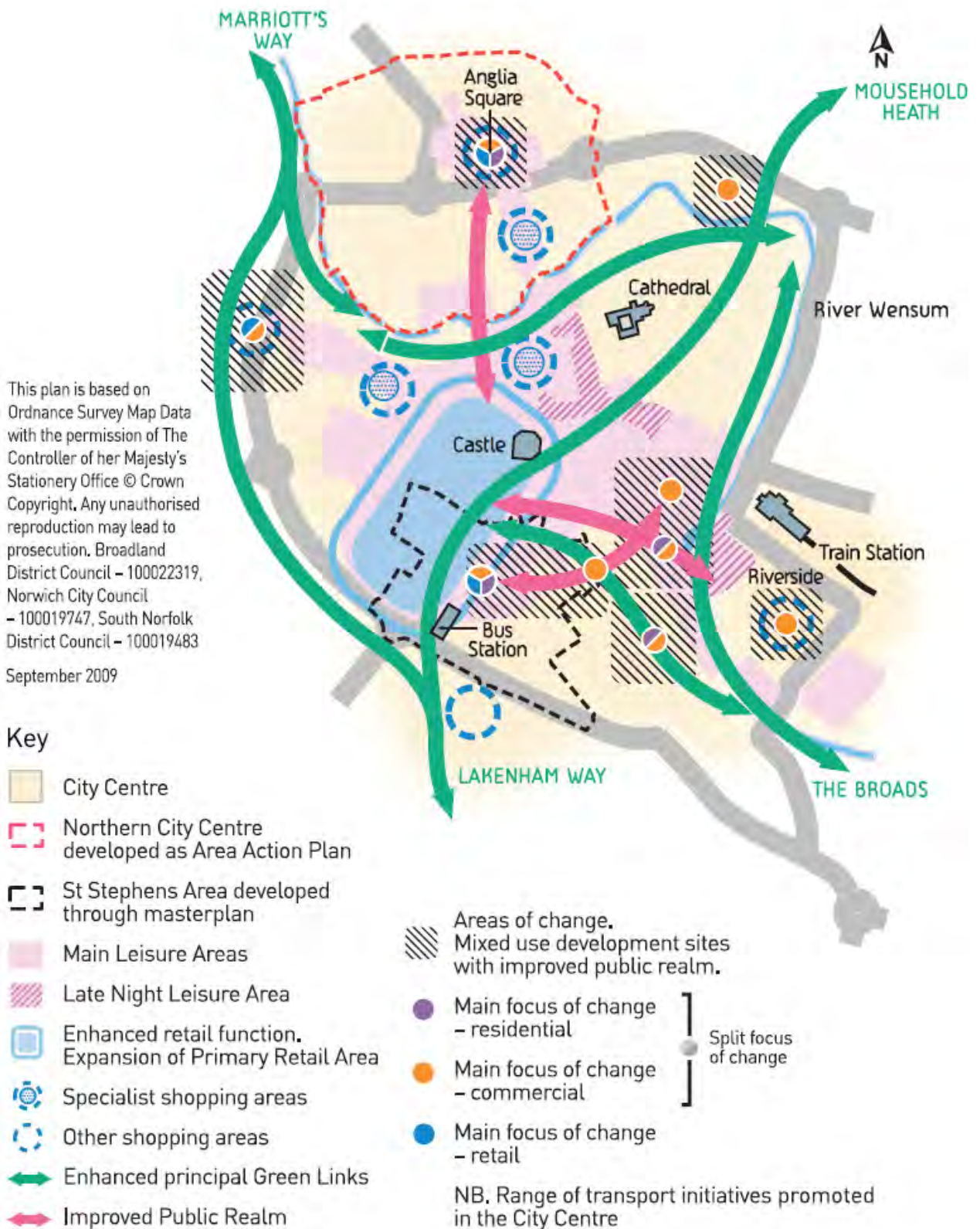
³ CoStar

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

- 4.16 Taking a more united approach across the broader NPA area, rather than the local authority level, will aid in managing some of the movements in a way that works for Norwich as a whole. There is, however, scope to attract businesses to Norwich, particular given the noted desirability of the city and the quality of its amenities. The 2016 Tech Nation report⁴ identifies Norwich as an early-stage cluster, with potential across a range of tech sectors and a burgeoning network of tech groups such as Hot Source, Norfolk Developers and SyncNorwich.
- 4.17 Currently, as noted in previous sections, there is an existing stock of space available within the city centre, however only a small share provides the quality and nature of space that is likely to be attractive to suit tech businesses, particularly start-ups. The Tech Nation report notes that co-working spaces such as Whitespace are providing affordable space for startups and helping the market, however our assessment is that further space will be required of the appropriate type/quality.
- 4.18 Tech Nation also noted wider challenges to startups which are gradually being addressed, albeit more could be done. For example the challenge of access to finance is slowly being addressed with schemes such as Grants4Growth. Further, Norwich's key asset is its access to talent, which is commonly found to be the biggest issue for tech firms and KIBs more generally, with the third highest concentration of science and research parks in the country and two leading universities.
- 4.19 As the Tech Nation report finds, Norwich not only has a suite of amenities that are attractive to a range of businesses, but also has an existing cluster of KIB businesses and networks, affordable workspace, finance provision, and skilled labour force that makes the city attract to high value tech businesses. Providing evidence, 5,306 digital tech jobs were identified in Norwich, with many based in the core, creating £148m in GVA from digital firms that increased by 22% between 2010 and 2014. As suggested, there is clear potential to further improve on this existing strength and to build on what differentiates the core from peripheral locations and to attract businesses that prefer to locate in central, 'buzzing' locations.

⁴ http://www.techcityuk.com/wp-content/uploads/2016/02/Tech-Nation-2016_FINAL-ONLINE-1.pdf

Figure 23: Norwich City Centre



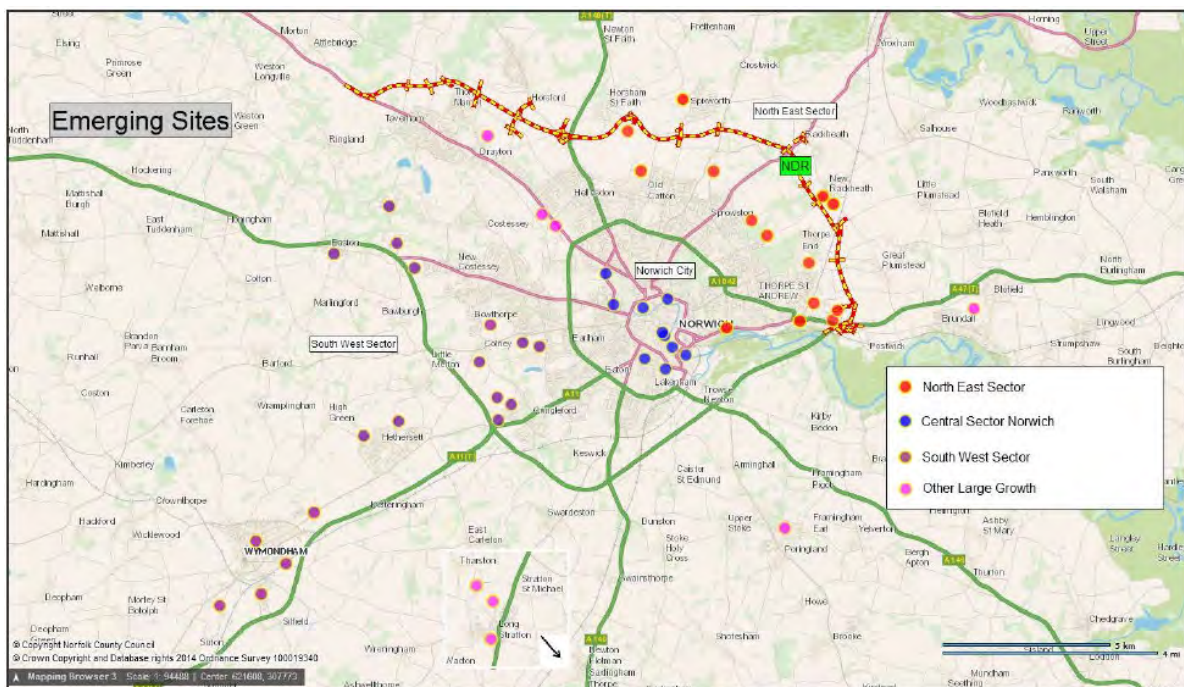
Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

Summary/Findings

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

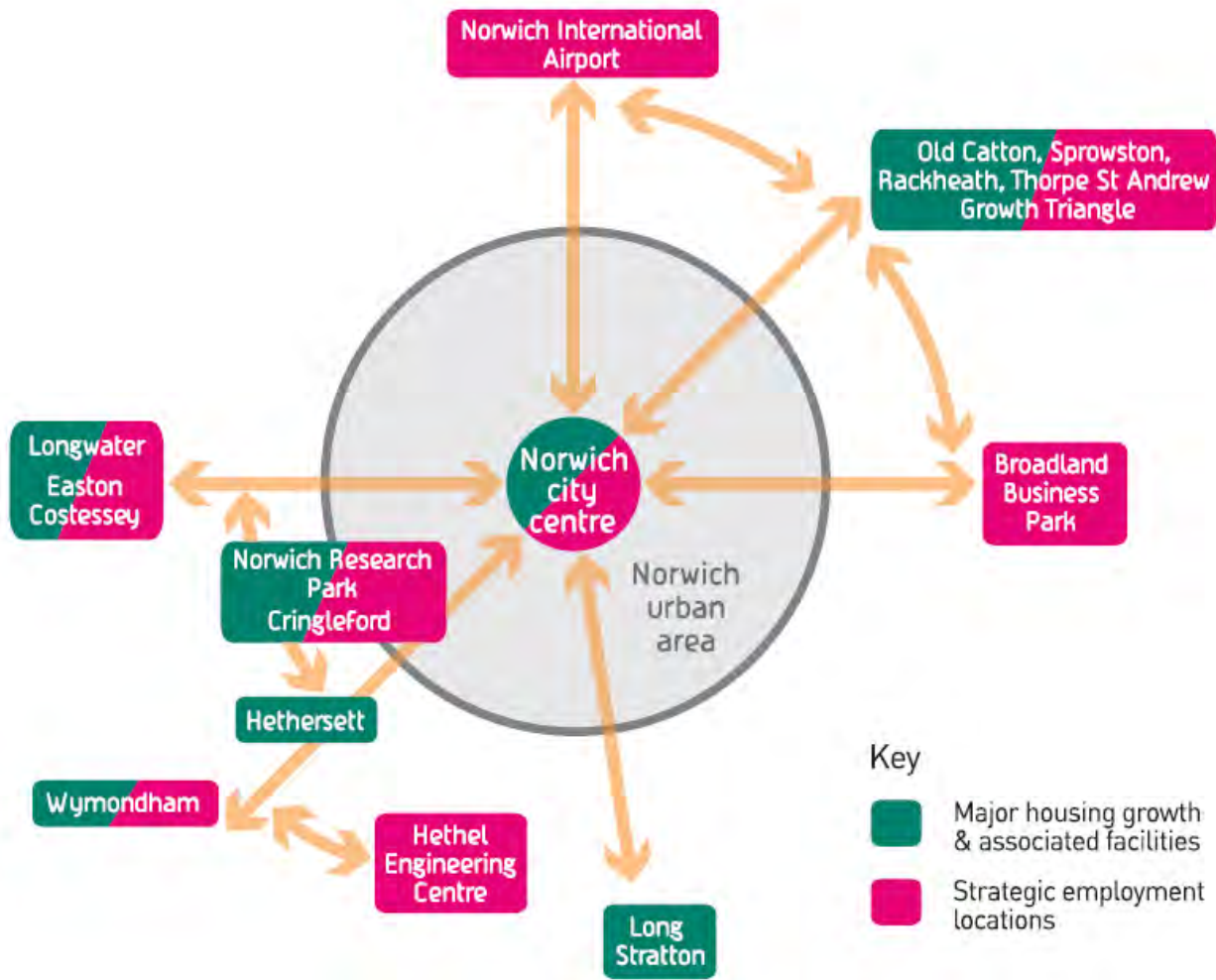
4.21 This section also shows that there is some competition between growth locations in the Norwich that may not be being managed effectively and is causing loss of office occupancy in the city centre. Management at the NPA level will aid to deliver a strategy that works better for Norwich as a whole,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

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



Source: Greater Norwich Infrastructure Plan, published in July 2016

Figure 25: Relationships between Norwich Growth Locations



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

5. Conclusions

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

APPENDIX 3

SUSTAINABILITY APPRAISAL REVIEW

North East Wymondham

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

March 2020

DRAFT

North East Wymondham

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

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

- 1.1 This report presents a review of the Sustainability Appraisal (SA) process supporting the Greater Norwich Local Plan (GNLP), which is at Regulation 18 stage¹. The GNLP is being produced by Broadland District Council (BDC), Norwich City Council (NCC) and South Norfolk Council (SNC) working together with Norfolk County Council (NCC) through the Greater Norwich Development Partnership (GNDP) and will guide development up to 2038. The review has focused on the SA (which incorporates Strategic Environmental Assessment (SEA)) of the Greater Norwich Local Plan: Regulation 18 (C) SA Report (herein referred to as the Regulation 18 (C) SA Report), prepared by Lepus Consulting on behalf of the GNDP in January 2020².
- 1.2 The Regulation 18 (C) SA Report has been published for consultation as part of the evidence base supporting the GNLP Draft Strategy. Whilst the review has focused on the latest SA report, reference has been made to earlier reports where necessary to give a view on the adequacy of the whole iterative SA process.
- 1.3 The GNDP published the SA Scoping Report in 2017³, following consultation with Historic England, Natural England, the Environment Agency and other relevant bodies in 2016. The SA Scoping Report forms the starting point for the SA and guides the evolution and assessment of the emerging GNLP. The next stage of the SA process involved the preparation and consultation of the Regulation 18 Interim SA⁴, which was prepared alongside the Regulation 18 Stage A Growth Options and Site Proposals Consultation in January to March 2018. The Regulation 18 (C) SA Report is the latest stage of the SA process.
- 1.4 A local plan draft containing a favoured option and the reasonable alternatives to that option, along with a draft SA report assessing the plan, will be consulted on prior to the publication of the local plan for submission. The 'final' SA report will then be submitted with the GNLP to the Secretary of State for examination in public.
- 1.5 The full SA review is included at Appendix 1. It uses a 'traffic light' scoring system to identify areas that would benefit from improvement (amber) and those elements of the SA process that are considered to comply fully with the requirements (green). No areas of major deficiency were identified in the SA (red).

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

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

³ GNDP, March 2017, SA Scoping Report for the Greater Norwich Local Plan.

⁴ GNDP, March 2018, Interim Sustainability Appraisal of the Greater Norwich Local Plan.

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

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

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

2.0 Review of SA

Purpose of Review

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

Review Summary

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

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

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

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

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

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3.0 Site Appraisal

Performance of Land North East of Wymondham

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

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

Summary of Site Appraisal

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

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4.0 Conclusion

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

APPENDIX 1:
SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

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SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

	Compliance Key	Notes
<p><i>This is a compliance review against the requirements of the Regulations. It has not been undertaken by a legal professional. The SA process has been reviewed against the SEA Regulations and requirements of the Planning and Compulsory Purchase Act 2004 on SA. The following reports have been considered:</i></p> <p><i>2017 SA Scoping Report; 2018 Interim SA; and Jan 2020 Regulation 18 (C) SA Report.</i></p>		Meets requirements
		Improvements suggested
		Risk of challenge. Does not meet requirements

SEA Regulations, Regulation 12 and Schedule 2 - Contents of Environmental Report

<p>1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.</p>		<p>Covered in 2017 SA Scoping Report, Section 4 of the 2018 Interim SA Report and Sections 1 and 2 of the Regulation 18 (C) SA Report.</p> <p>The introduction section of the 2017 SA Scoping Report sets out the purpose and objectives of the GNLP. Section 4 of the 2018 Interim SA Report builds on this information and evaluates the GNLP Objectives against the Sustainability objectives.</p> <p>Section 1.2 of the Regulation 18 (C) SA Report outlines the GNLP area and states that 'the GNLP will guide development across the three districts up to 2038, providing both strategic policies and site allocations to meet demand for housing and employment, as well as other land use matters'.</p> <p>Section 2 of the Regulation 18 (C) SA Report explains that the 2017 SA Scoping Report has identified other relevant plans, programmes and environmental protection objectives. Appendix 1 of the 2017 SA Scoping Report lists the plans, programmes and broader sustainability strategies that are relevant to the preparation of the GNLP and to the SA and the implications for the SA.</p> <p>The Regulation 18 (C) SA Report does not adequately reference the Cambridge Norwich Growth Corridor, SHMA Core Area and the NPA.</p>
<p>2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>		<p>Covered in 2017 SA Scoping Report, Section 2 of the 2018 Interim SA Report and Section 2 of the Regulation 18 (C) SA Report.</p> <p>Section 2 of the Regulation 18 (C) SA Report explains that the full baseline is provided in the 2017 SA Scoping Report, and this has been consulted on with relevant statutory bodies.</p> <p>Sections 1 to 15 of the 2017 SA Scoping Report provide commentary and data on a topic by topic basis. The topics cover the main sustainability issues relevant to the GNLP, which are considered to represent the current baseline position of the environment in Greater Norwich.</p> <p>Section 2.3. of the 2018 Interim SA Report provides a summary of the sustainability baseline and the likely evolution of the baseline without the implementation of the GNLP for each aspect of the environment.</p>
<p>3. The environmental characteristics of areas likely to be significantly affected.</p>		<p>Covered in 2017 SA Scoping Report, Section 2 of the 2018 Interim SA Report and Section 2 of the Regulation 18 (C) SA Report.</p>
<p>4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.</p>		<p>Covered in 2017 SA Scoping Report and Section 3 of the Regulation 18 (C) SA Report.</p> <p>Section 3 of the Regulation 18 (C) SA Report acknowledges the protection afforded to European designated ecological sites (e.g. The Broads Special Area of Conservation (SAC) and Broadland Special Protection Area (SPA)/Ramsar, and the River Wensum and Norfolk Valley Fens SACs) by the Habitats Regulations, in accordance with Article 6(3) of the EU Habitats Directive.</p> <p>With regard to SA Objective 3 'Biodiversity, Geodiversity and Green Infrastructure' – Table 3.3 of the Regulation 18 (C) SA Report states that the HRA process will inform the development of the GNLP and the extent to which these policies mitigate potential negative impacts will be fully realised upon completion of the HRA. The HRA will inform policies relating specifically to these designated sites and the locations of future development to ensure no adverse impacts on site integrity of European sites.</p> <p>This does not provide confidence that the HRA and SA are well linked, as a HRA¹ has been completed for the Regulation 18 Draft Plan and therefore should be referenced here. Briefly outlining the conclusions of the HRA would give more meaning to the assessment of ecological effects, particularly when assessing the sites and the decisions made and would make the argument that the findings have been incorporated into the SA more robust. There is no evidence that cumulative effects have been assessed in relation to European sites, which would have been the case for in-combination effects in the HRA, for legal compliance. Given the need for assessments to be coordinated, it would be helpful to have more information within the Regulation 18 (C) SA Report on the HRA undertaken for the Local Plan to date.</p>

¹The Landscape Partnership Ltd, December 2019, Habitats Regulations Assessment of Greater Norwich Regulation 18 Draft Plan for GNDP.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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APPENDIX 2:
SITE APPRAISAL NORTH EAST WYMONDHAM

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SITE APPRAISAL NORTH EAST WYMONDHAM

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

SA Objective	Decision making criteria for site allocations and general polices	Score	Comments
<p>1. Air Quality and Noise</p> <p>Minimise air, noise and light pollution to improve wellbeing.</p>	<ul style="list-style-type: none"> Will it have a significant impact on AQMAs in Norwich city central and Hoveton? Will it minimise impact on air quality? Will it minimise the impact of light and noise pollution? 	0	<p>The site is not located within an Air Quality Management Area (AQMA). The nearest AQMA is Central Norwich, which is located approximately 11.4km to the north east of the site and is declared an AQMA for Nitrogen dioxide (NO₂).</p> <p>The proposed end use of the site is primarily for residential purposes and is in keeping with existing uses in the surrounding area. North East Wymondham has experienced recent growth over the last 10 years that extends built and committed development along Norwich Common and Tuttle's Lane towards Melton Road. The Site is located in an area that has been subject to a number of planning applications and appeals which has culminated in consent for approximately 1,700 residential dwellings forming an urban extension to Wymondham. The development is therefore not anticipated to cause significant impacts in relation to air quality, light and noise pollution, when compared to the existing site and surrounding uses.</p> <p>Air Quality and Noise ES chapters have been prepared and will be submitted with the planning application for development at the site.</p> <p>During the construction phase of the development, dust, emissions and noise would be generated in association with plant and vehicles. Dust, emissions and noise would be managed in accordance with standard best practice mitigation measures, implemented through a CEMP secured by a planning condition, in accordance with all relevant legislation, and is not anticipated to generate significant adverse effects.</p> <p>There would be emissions from vehicle exhausts and energy emissions associated with up to 650 new residential dwellings during the operation of the proposed development. The assessment indicates that pollutant levels at sensitive locations across the site were below the relevant air quality objectives and the location is considered suitable for residential use. The site is in close proximity to local facilities and public transport within Wymondham and Hethersett, reducing the need for car travel, including:</p> <ul style="list-style-type: none"> Education facilities, healthcare, supermarkets, retail, restaurants, recreation and leisure facilities; Wymondham Rail Station is located approximately 2.5km to the south west of the site, with regular direct services to Norwich, Thetford, Cambridge and Ely. The station is served directly by bus route 14/14A, or can be reached on foot from Wymondham town centre within an average walking time of less than 10 minutes; and Bus services, with the nearest bus stops currently provided on Norwich Common (B1172), approximately 750m to the south east of the site, with services running to Norwich approximately every hour. Services also run from Tuttle's Lane East to the south of the site to Wymondham town centre approximately every 20 minutes. <p>The development includes for new facilities comprising a local centre, land safeguarded for a 2-form entry primary school, land safeguarded for potential 6th form college provision, open space and will include pedestrian and cycling access and will encourage sustainable travel to and within the site, thereby further mitigating significant impacts on air quality.</p> <p>The noise assessment was based on the findings of an acoustic survey. The assessment shows that in the proposed dwelling locations, suitable internal sound levels would be achievable with windows closed and standard thermal double glazing. The location is considered suitable for residential use and no significant noise impacts are anticipated.</p> <p>All external lighting installations are to be designed in line with the Institution of Lighting Professionals (ILP) Guidance notes on reduction of obtrusive light.</p>

SA Objective	Decision making criteria for site allocations and general polices	Score	Comments
<p>2. Climate Change Mitigation and Adaptation (ref: SA2)</p> <p>Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change.</p>	<ul style="list-style-type: none"> • Will it minimise CO₂ emissions? • Will it support decentralised and renewable energy generation? • Will it minimise the risk of fluvial or surface water flooding? 	+	<p>The development will reduce the need to travel far as the site is well connected to local facilities, public transport and employment opportunities, within Wymondham and Hethersett. The site is strategically located close to Norwich, Thetford, Cambridge and Ely, all which are accessible along the public transport corridor. Elm Farm Business Park is located adjacent to the eastern extent of the site.</p> <p>In addition, the development includes for the provision of a local centre, land safeguarded for a 2-form entry primary school, land safeguarded for potential 6th form college provision, open space and will create and enhance pedestrian and cycling routes, to encourage more sustainable modes of transport. This will help to reduce carbon emissions which will have benefits for climate change mitigation and adaptation. The concept masterplan shows that the development will enhance the green infrastructure network through the provision of a country park, open space and landscaping, which will increase mitigation and adaptation/resilience to climate change.</p> <p>A Water Resources and Flood Risk ES chapter, supported by a FRA and Drainage Strategy have been prepared and will be submitted with the planning application. The FRA provides a review of desk-based information related to flood risk and drainage to determine the suitability of the site for development. The site is located fully within Flood Zone 1 (low risk). The Drainage Strategy will ensure surface water run-off and foul water drainage from the development are appropriately managed in a sustainable way now and into the future, including allowance for climate change. The onsite sewers are likely to be adopted by Anglian Water.</p> <p>The surface water drainage strategy is to discharge surface water runoff to ground via attenuation using Sustainable Drainage Systems (SuDS) to reduce flood risk. At this stage, primary features include ponds, to provide the required storage in suitable locations across the site and these could be designed to consider wider environmental net gains such as amenity value and ecological enhancement. This could include designing areas of permanent water, wetlands and reedbeds, varying the bank slopes of basins etc. The scheme will be future proofed so that it is resilient to an increase in extreme weather events associated with climate change and potential flooding.</p>
<p>3. Biodiversity, Geodiversity and Green Infrastructure (ref: SA3)</p> <p>Protect and enhance the area's biodiversity and geodiversity assets and expand the provision of green infrastructure.</p>	<ul style="list-style-type: none"> • Will it minimise impact on designated sites and important species and habitats? • Could it provide opportunities for bio- or geo-diversity enhancement? • Could it contribute to green infrastructure networks? • Will it help minimise the impact on air quality at designated sites? • Will it ensure that current ecological networks are not compromised and future improvements in habitat connectivity are not prejudiced? 	++	<p>The site primarily comprises undeveloped arable land. Boundary vegetation comprises a mixture of hedgerow, semi-natural woodland, coniferous and broadleaved plantation woodland. There are areas of grassland and trees along field boundaries. There is also a number of small ponds at various places along the site boundary. The eastern parcel of the site includes Kett's Oak, which is an ancient oak tree and is one of the 50 Great British Trees. The site presents good opportunities for enhancement and connectivity to surrounding sites.</p> <p>A Biodiversity ES chapter has been prepared for the site and will be submitted with the planning application. The chapter is based on the findings of a desk study, an Extended Phase 1 Habitat Survey (June 2019), and specific faunal surveys for bats, badger, breeding birds, Great Crested Newts and reptiles. The survey reports are included as appendices to the ES chapter.</p> <p>The site itself is not covered by any statutory designations. The following are located within 10km:</p> <ul style="list-style-type: none"> • Toll's Meadow, Wymondham Local Nature Reserve (LNR) is located approximately 2.2km to the southwest of the site; • Lower Wood, Ashwellthorpe SSSI is located approximately 4.6km to the south of the site; • Norfolk Valley Fens Special Area of Conservation (SAC) is located approximately 6.2km to the north west of the site; and • River Wensum SAC is located approximately 8.2km to the north of the site. <p>The potential for significant impacts on these receptors has been assessed within the ES Biodiversity chapter. The HRA of the draft GNLP has been reviewed. Although the plan does not specifically assess the development, it considers overall proposed growth within the region and is therefore relevant in terms of identifying likely adverse effects. The majority of designated ecologically sensitive sites are located a substantial distance from the site, effects are therefore unlikely. It is considered that the development will provide sufficient areas of public open space which will adequately mitigate for any potential recreational impacts.</p> <p>The following mitigation measures have been incorporated into the design of the development to ensure there are no significant impacts on protected species, habitats or sites:</p> <ul style="list-style-type: none"> • Construction safeguards to be secured under a CEMP (and European Protected Species licence in relation to Great Crested Newt); • Detailed design of the built development's layout to retain key habitat areas, comprising the majority of mature trees, hedgerows and ponds (and avoid backing onto sensitive habitat areas); • Provision of open space areas forming green infrastructure corridors through and around the built development areas; • Creation of a large area of open space in the eastern parcel of the site forming a country park; and • implementation of a SuDS scheme and lighting design, to be secured under future reserved matters applications for the detailed design of the Development. <p>Such measures are considered to avoid or minimise any significant adverse effects resulting from the development. A range of enhancement measures have been identified to provide gains in biodiversity across the site, including habitat creation and enhancement and provision of new nesting and shelter opportunities for faunal species. It is considered that the development would result in an overall gain in the existing ecological interest supported by the site, with significant benefits anticipated in respect of habitats, bat species, birds, invertebrates, reptiles and Great Crested Newts. This will ensure compliance with national and local planning policy.</p>

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

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

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

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

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

APPENDIX 4

ANNUAL MONITORING REPORT 2018-19

Joint Core Strategy for Broadland, Norwich and South Norfolk:

Annual Monitoring Report 2018-19

January 2020



Jobs, homes, prosperity for local people

Contents

1. Executive Summary	1
2. Introduction	3
3. Joint Core Strategy Monitoring.....	4
Objective 1: to minimise the contributors to climate change and address its impact.....	6
Objective 3: to promote economic growth and diversity and provide a wide range of jobs.....	17
Objective 4: to promote regeneration and reduce deprivation	21
Objective 5: to allow people to develop to their full potential by providing educational facilities to meet the needs of existing and future populations	22
Objective 6: to make sure people have ready access to services.....	24
Objective 7: to enhance transport provision to meet the needs of existing and future populations while reducing the need to travel	25
Objective 8: to positively protect and enhance the individual character and culture	26
Objective 9: to protect, manage and enhance the natural, built, and historic environment, including key landscapes, natural resources and areas of natural habitat or nature conservation	27
Objective 10: to be a place where people feel safe in their communities	29
Objective 11: to encourage the development of healthy and active lifestyles.....	30
Objective 12: to involve as many people as possible in new planning policy	32
Appendices A to G	33

1. Executive Summary

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

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

- 1.6 A 5-year land supply can be demonstrated for this monitoring year. Greater Norwich Authorities can demonstrate 5.89 years of housing supply.
- 1.7 A range of activities are underway that will have a positive impact on stimulating growth and help deliver against targets over the coming years.
- 1.8 The local planning authorities, working with the County Council and the Local Enterprise Partnership through the Greater Norwich Growth Board, progressed implementation of the Greater Norwich City Deal agreed with Government in 2013. Working together, the partners support the private sector to deliver in numerous ways, including:
- making a Local Infrastructure Fund available to developers to unlock site constraints;
 - delivering the NDR and other transport measures, and working towards delivering the Long Stratton bypass and better public transport, including through “Transforming cities “and
 - engagement in skills initiatives to improve the match between labour supply and demand.
- 1.9 The Local Planning Authorities (LPAs) are reviewing and rolling forward the JCS to produce the Greater Norwich Local Plan (GNLP), scheduled to be adopted in 2022. The AMR will inform and be informed by this process.

2. Introduction

Context

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

Purpose

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

3. Joint Core Strategy Monitoring

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

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

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

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

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

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

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

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

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

Total CO₂ emissions per capita for each sector

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

3.8 CO₂ emissions per capita decreased in each of the local authority areas in the Greater Norwich between 2017 and 2018, the latest year in which figures are available.

3.9 CO₂ emissions per capita across the industrial and commercial and domestic sectors in the Greater Norwich area decreased between 2017 and 2018, while the transport sector increased slightly for Broadland and South Norfolk.

Sustainable and Renewable energy capacity permitted by type

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

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

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

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

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

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

Water efficiency

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

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

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

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

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

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

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

Net housing completions

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

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

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

Affordable housing completions

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

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

Provision of Gypsy and Traveler pitches

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

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

- 3.31 There is no requirement for LPAs to demonstrate a five-year supply of sites for Travelling Showpeople, residential boat dwellers or residential caravan dwellers. There is, however, a requirement to demonstrate a five-year supply of pitches for Gypsies and Travelers (paragraph 10a of Planning Policy for Traveller Sites). The expectation is for an ongoing requirement for Gypsy and Traveler pitches to be met through a combination of "windfall" sites and allocated pitches in the GNLP.

Accessibility to market towns and key centres of employment during the morning peak (0700-1000), returning in the afternoon peak (1600-1900)

- 3.32 This indicator has shown a slight reduction in accessibility during this monitoring year. Buses times are run on a winter month timetable where there is a more limited service.

(Gross) new house completions by bedroom number, based on the proportions set out in the most recent Sub-Regional Housing Market Assessment

- 3.33 Since we do not have data for Norwich, it is not clear whether this indicator has achieved its target this year (see objective 2).

Location		14/15	15/16	16/17	17/18	18/19
Broadland ²	1 bed	50	26	57	27	69
	2 bed	115	133	146	205	187
	3 bed	174	221	217	234	198
	4 bed	112	241	233	228	195
	Unknown	3	0	0	0	0
Norwich ⁴³		No data collected	No data collected	No data collected	No data collected	No data collected
South Norfolk	1 bed	56	70	94	121	98
	2 bed	257	173	251	230	266
	3 bed	461	263	435	396	483
	4 bed	240	248	375	335	310
	Unknown	13	11	7	36	71

No comparable data for the Greater Norwich Area due to the lack of data from Norwich.

² Gross completions

³ Includes conversions, data updated from Aug 2015 information from Norwich City Council and different from previous years

Objective 3: to promote economic growth and diversity and provide a wide range of jobs

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status				
Permitted amount of floorspace and land by employment type	B1 – 118 hectares/ 295,000m2 B2/8 – 111 hectares 2007 – 2026	LPA	Greater Norwich area Broadland Norwich South Norfolk	See table 3.34									
Amount of permitted floor space	100,000m ² Norwich City Centre 100,000m ² NRP 50,000m ² BBP	LPA	Norwich	-29122m ²	-7774m ²	-24370 m ²	-40205m ²	-13961 m ²					
			NRP	1797m ²	1512m ²	0m ²	No data	No data					
			BBP	0	No data	No data	No data	No data					
			Elsewhere	S. Norfolk - 78m ²	S. Norfolk - 1288m ²	S. Norfolk - 443m ²	S. Norfolk - 7465.70 M ²	No data					
Annual count of employee jobs by BRES across Plan area	2222 per annum increase	ABI/BRES (Nomis)	Greater Norwich area	177,100	182,000	187,000	193,000	Data not yet released					
			Broadland	43,700	45,000	46,000	47,000						
			Norwich	85,300	87,000	90,000	93,000						
			South Norfolk	48,100	50,000	51,000	53,000						
Employment rate of economically active population	Increase	Annual Population Survey (Nomis)	Greater Norwich area	72.90%	79.20%	80.50%	75.40%	78.90%					
			Broadland	78.10%	80.90%	80.50%	84.30%	78.50%					
			Norwich	69.10%	77.10%	78.30%	68.50%	77.10%					
			South Norfolk	72.40%	80.30%	83.20%	75.60%	81.60%					
Percentage of workforce employed in higher occupations	Annual increase of 1%		Greater Norwich area	41%	41%	43%	50%	44%					
			Broadland	36%	43%	50%	41%	47%					
			Norwich	44%	37%	37%	51%	39%					
			South Norfolk	46%	44%	45%	60%	47%					
National retail ranking	Maintain top 20 ranking	Venuescore	Norwich	13th	13th	13th	13th	13th					
Net change in retail floorspace in city centre	No decrease in retail floor space	LPA	Norwich	-859	+225 sqm	No data	-217	-6231					
Percentage of permitted town centre uses in defined centres and strategic growth locations	100%	LPA	Broadland	A1	0%	A1	18.18%	A1	23%	A1	42%	A1	17.6%
				A2	0%	A2	0%	A2	100%	A2	100%	A2	100%
				B1a	15%	B1a	19.04	B1a	28%	B1a	20%	B1a	38.5%
				D2	13%	D2	0%	D2	15%	D2	33%	D2	17.3%
			Norwich	No data	A1	28.1%	A1	38.9%	A1	6%	A1	0%	
					A2	100%	A2	43.1%	A2	100%	A2	0%	
					B1a	100%	B1a	0%	B1a	0%	B1a	31%	
					D2	73.1%	D2	0%	D2	3%	D2	76%	
			South Norfolk	A1	62.5%	A1	100%	A1	21.7%	A1	70%	A1	38%
				A2	50%	A2	100%	A2	25%	A2	0%	A2	50%
				B1a	41%	B1a	73.1%	B1a	50%	B1a	75%	B1a	25%
				D2	0%	D2	55.6%	D2	66.7%	D2	71%	D2	0%

Permitted amount of floor space and land by employment type⁴

3.34 In recent years, it has only been practical to collect data on planning permissions granted. Consequently, as the data presented here is incomplete, it is not clear whether we have achieved our target. What is clear is that while the permitted amount of employment space has increased overall over the last 3 years, there has been a sustained loss of office floor space in the city centre itself.

	Use Class	14/15	15/16	16/17	17/18	18/19	RAG Status
Greater Norwich area (floorspace in sqm)	B1	-30,694	+26,617	+34,284	+41,259	No data	
	B2	+724	+2,035	+2,453	+3,722	No data	
	B8	+819	+13,194	+20,781	+10,338	No data	
Greater Norwich area (hectares)	B1	-12.2	+10.6	+13.7	+16.5	No data	
	B2	+0.2	+0.5	+0.6	+0.9	No data	
	B8	+0.5	+8.8	+13.9	+6.9	No data	
	B2/B8	+0.7	+9.3	+14.5	+8.8	No data	
Broadland (sqm)	B1	+2,861	+28,923	+53,451	+80,109	+82,532	
	B2	+2,389	+1,364	+6,197	+8,566	+8,060	
	B8	+552	+105	+376	+17,531	+15,583	
Norwich (sqm) ⁵	B1						
	B1a	+31,063	-8,881	-24,449	-40,205	-11,695	
	B1b	+785	0	0	+113.8	0	
	B1c	+3,940	-8,562	-1,119	-217.7	+145.4	
	B2	-3,051	+1,498	-5,003	-8068	-280	
	B8	-214	-1,968	3,254	-7,633	-2,131	
South Norfolk	B1	2,233	15,157	+7,401	+1,459	No data	
	B2	1,386	-827	+1,259	+3,224	No data	
	B8	481	15,057	17,151	+440	No data	

+ = net gain
- = net loss

⁴ Calculated using figures from the Greater Norwich Employment Growth and Employment Sites and Premises Study 2008

⁵ Data updated from 2015 information from Norwich City Council and different from previous years

Office space developed

- 3.35 There was a net loss of 11,695 sqm of office floor space (use class B1a) in Norwich this monitoring year, predominantly in the city centre. Loss includes change of use of long-term empty offices at St Mary's Works. There is currently very limited commercial impetus to develop any new office space in the city centre due to relatively low rental values making speculative development unviable.
- 3.36 Most of the office floor space losses are being developed into residential properties and schools. There remains no planning control over the loss of office space when converted to these uses.
- 3.37 Data published by the Valuation Office Agency (VOA) (Business Floorspace (Experimental Statistics VOA, May 2012) shows that the office stock in the Norwich local authority area stood at 362,000sqm in 2006 and that this had grown to 378,000sqm in 2012. The office floorspace total is likely to include a proportion of floorspace which for planning purposes is actually in use class A2 – financial and professional services, or D1 – for example, offices associated with police stations and surgeries, rather than just B1 (a). However, in the absence of any more accurate and up to date national or local datasets, the VOA figure of 378,000sqm is used as a baseline Norwich stock figure for 2012.
- 3.38 Annual monitoring since the base date of the JCS (April 2008) shows the following change in the stock of B1 (a) office floorspace in Norwich from 2008 to 2019, derived from planning permissions and completions records. From 2008 to 2019, the overall net reduction in the office floor space equates to around 29%. There is no indication that there will be any slowdown in this trend so long as residential development values in the city centre remain higher than office values and the absence of any additional planning obligation requirements on developers.

Date	Norwich Office Floor Space Variances
2008/09	13,205sqm net gain
2009/10	657sqm net gain
2010/11	2,404sqm net gain
2011/12	-115sqm net loss
2012/13	-3187sqm net loss
2013/14	-2024sqm net loss
2014/15	-31063 sqm net loss
2015/16	-8881 sqm net loss
2016/17	-24449 sqm net loss

2017/18	-40205 sqm
2018/19	-11695 sqm
Total actual/potential office floorspace change Norwich city April 2008-March 2019	-105,353 sq. m net loss (-29.0%)

Annual count of employee jobs⁶

3.39 No data has been released for this year.

Employment rate of the economically active population

3.40 Employment rates have increased over the past year. However, it is important to note that this dataset is based on sample surveys and fluctuates between surveys.

Percentage of the workforce employed in higher occupations

3.41 The percentage of the workforce employed in higher occupations across the Greater Norwich area has decreased in this monitoring year.

National Retail Ranking for Norwich

3.42 There were changes to the Venuescore evaluation criteria between 2011/12 and 2012/13 which affected Norwich's position resulting in a fall to the position of 13th from 9th. This year, the target for the city centre has been achieved by maintaining 13th position.

3.43 Overall, Norwich continues to compete well against larger cities in the Venuescore ranking nationally. It has the largest proportion of its retailing in the city centre of any major city nationally and is the only centre in the East of England that ranks in the top twenty.

Net change in retail floor space in the city centre

3.44 Loss of retail floor space (of 6,231 sqm) has been identified from Norwich's retail monitor. This decrease is greater than the last 10 years combined. This significant reduction can be largely contributed to the diversification of the recently rebranded Castle Quarter where there has been the opening of a number of leisure uses which now occupy some of the larger units which were previously retail.

3.45 In recent years, retail investment in the city centre has

⁶ Data gathered in September. Although this dataset is not recommended for monitoring purposes it is nonetheless the only dataset available for measuring jobs at lower level geographies.

concentrated on improvements and enhancements to existing stock, for example the refurbishment of Castle Quarter, the emerging new proposals for Anglia Square, and the extension of Primark.

Previous Years

- 3.46 The trend evident since April 2008 is for a continued slow reduction in retail floor space at the expense of other uses. Changes in policy have allowed more flexibility of uses in the city centre to encourage the development of uses such as cafes and restaurants. These complementary uses support retail strength and the early evening economy. In addition, ongoing planning deregulation at a national level has extended the scope of permitted development rights.
- 3.47 These have introduced more flexibility in the use of retail and commercial floor space; in many cases allowing former shops to change their use without the need for planning permission.
- 3.48 Although a reduction in retail floor space runs counter to the aim of Policy 11 of the JCS to increase the amount of retailing in the city centre, it is in support of the aim to increase other uses such as the early evening economy, employment and cultural and visitor functions. Such diversification of uses has helped strengthen the city centre's function in times of increased internet shopping.

Percentage of completed town centre uses in defined centres and strategic growth locations

- 3.49 Proportions vary depending on use class and location. In Broadland, the use of Financial and professional services (A2) has achieved the set target of 100%, however, overall targets for town centre uses have not been met.

Objective 4: to promote regeneration and reduce deprivation

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status
Number of Lower Super Output Areas in national most deprived 20%	Reduction by 50% in plan period (28 out of 242 in 2007)	IMD (DCLG)	Greater Norwich area	17	No data	No data	No data	0	
			Broadland	0				0	
			Norwich	17				0	
			South Norfolk	0				0	
The amount of land on brown field register that has been developed	Increase the amount of completions for housing on land identified in brown field register in % form	LPA	Broadland			No data	No data	2.19 ha (2.1%)	
			Norwich			No data	No data	1.34 ha	
			South Norfolk			No data	No data	5.05 Ha (22%)	

Number of Lower Super Output Areas in national most deprived 20%

- 3.50 The Index of Multiple Deprivation allows each Lower Super Output Area (LSOA) in England to be ranked relative to one another according to their level of deprivation. It must be noted that just because the rank of deprivation has improved it does not mean that deprivation itself has improved in any given area, but rather that deprivation has decreased relative to other parts of the country. The 2019 Index of Multiple Deprivation data shows the number of Lower Super Output Areas in the Greater Norwich area has reduced from 17 to 0, achieving and exceeding the set target.

The amount of land on the brownfield register that has been developed

- 3.51 This is a new indicator and further data will need to be collected over the years to track the development of this indicator. It is also important to note that since the size of the brownfield register changes every year, the percentage of completions is not necessarily an accurate account of the progress of development.

Objective 5: to allow people to develop to their full potential by providing educational facilities to meet the needs of existing and future populations

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status
School leaver qualifications - % of school leavers with 5 or more GCSEs at A* to C grades including Maths and English	Year-on-year increase from 2007 value of 53%	Norfolk County Council	Greater Norwich area	57.14%	65%	No data	Data discontinued	Data discontinued	Green
			Broadland	59.41%	68.80%				
			Norwich	45.52%	54.30%				
			South Norfolk	64.47%	69.30%				
16 to 18-year olds who are not in education, employment or training	Year-on-year reduction from 2006 value of 6%	Norfolk County Council	Greater Norwich area	5.10%	5.30%	3.40%	No data	No data	Grey
			Broadland	3.60%	3.50%	2.30%	No data	2.73%	Red
			Norwich	9.50%	8.20%	6.10%	No data	5.88%	Green
			South Norfolk	2.80%	2.80%	2.20%	No data	2.00%	Green
Proportion of population aged 16-64 qualified to NVQ level 4 or higher	Annual increase	Annual Population Survey	Greater Norwich area	33.80%	34.20%	36.80%	37.10%	38.40%	Green
			Broadland	29.30%	31.40%	28.60%	30.50%	39.70%	
			Norwich	35.90%	39.30%	38.80%	36.80%	38.50%	
			South Norfolk	35.70%	30.80%	42.00%	43.70%	36.90%	

School leaver qualifications - % of school leavers with 5 or more GCSEs at A* to C grades including Maths and English

- 3.52 The Government has changed its GCSE grading system from A* to G to 9 to 1 in 2017. An accurate direct comparison cannot be made with the previous grading system.

16 to 18-year olds who are not in education, employment or training

- 3.53 The proportion of 16 to 18-year olds not in education, employment and training has decreased in Norwich and South Norfolk.

Proportion of population aged 16-64 qualified to NVQ level 4 or higher

- 3.54 The proportion of the population aged 16-64 qualified to at least NVQ level 4 increased in the Greater Norwich area as a whole over the monitoring year, though there was a slight decline in South Norfolk.

Objective 6: to make sure people have ready access to services

Indicator	Target	Source	Location	14/15	15/18	18/19	RAG status
IMD access to service	Increase the number of LSOAs in the least deprived 50% on the IMD for access to housing and service	IMD	Greater Norwich	127	No data	138	Green
			Broadland	40		41	Green
			Norwich	58		70	Green
			South Norfolk	29		27	Red

Index of Multiple Deprivation access to services

- 3.55 The 2018-2019 data release shows the number of LSOAs in the least deprived 50% for access to housing and services has increased. Norwich has experienced the greatest level of improvements. It must be noted that just because the rank of deprivation has improved it does not mean that deprivation itself has improved in any given area, but rather that deprivation has decreased relative to other parts of the country.

Objective 7: to enhance transport provision to meet the needs of existing and future populations while reducing the need to travel

Indicator	Target	Source	Location	2001	2011	RAG status
Percentage of residents who travel to work:	Decrease in a), increase in b), c) and d)	Census (taken every 10 years)	Greater Norwich	a) 64% b) 8% c) 17% d) 9%	a) 67% b) 7% c) 18% d) 6%	
a) By private motor vehicles			Broadland	a) 70% b) 8% c) 9% d) 10%	a) 75% b) 6% c) 10% d) 6%	
b) by public transport			Norwich	a) 50% b) 9% c) 32% d) 7%	a) 52% b) 9% c) 33% d) 4%	
c) By foot or cycle			South Norfolk	a) 71% b) 5% c) 10% d) 12%	a) 73% b) 6% c) 10% d) 7%	
d) work at or mainly at home						

Percentage of residents who travel to work

3.56 The data is derived from the 2011 Census and so is only released for every 10 years. In comparison with the 2001 Census, the overall target was not been met. The percentage of residents who travelled to work by private motor vehicles has increased; the percentage of residents who travelled to work by public transport and worked at home decreased. However, there has been an improvement in increasing the percentage of residents travelling to work by foot or cycling. It is worth noting these data are potentially out of date and more recent data suggests a more positive picture. Recent monitoring conducted in the Norwich urban area showed that there has been a 40% increase in cycling since 2013. First Eastern Counties reported a 375,000 increase in Norwich bus journeys in 2015 after completion of Transport for Norwich changes to improve accessibility to the city centre for buses.

Objective 8: to positively protect and enhance the individual character and culture

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status
Percentage of Conservation Areas with appraisals adopted in the last 10 years	Year-on-year increase	LPA	Broadland	76%	76%	76%	70%	58%	Red
			Norwich	76%	76%	76%	76%	31%	
			South Norfolk	12%	12%	19%	42%	52%	Green

Percentage of Conservation Areas with appraisals adopted in the last 10 years

3.57 The percentage of conservation areas with recent appraisals has increased in South Norfolk but decreased for Broadland and Norwich. The figure for Norwich has decreased significantly as a large number of conservation area appraisals were prepared prior to 2010.

Objective 9: to protect, manage and enhance the natural, built, and historic environment, including key landscapes, natural resources and areas of natural habitat or nature conservation

Indicator	Target	Source	Location		14/15	15/16	16/17	17/18	18/19	RAG status
Net change in Local Sites in "Positive Conservation Management"	Year-on-year improvements	Norfolk Wildlife Trust	Greater Norwich area		73%	No data	73%	73%	74%	
			Broadland		75%		75%	77%	76%	
			Norwich		93%		90%	90%	87%	
			South Norfolk		70%		71%	69%	71%	
% of river assessed as good or better: a. Overall Status; b. Ecological Status; c. Biological Status; d. General Physio Chem Status; e. Chemical class	To increase the proportion of Broadland Rivers classified as 'good or better'.	Environment Agency	Broadland Rivers		No data	4%	4%	4%	4%	
						4%	4%	4%	4%	
						17%	17%	17%	17%	
						23%	23%	23%	23%	
						100%	100%	100%	100%	
Concentration of selected air pollutants NO2 and PM10 (particulate matter)	Decrease	LPA	Broadland	NO2	No data	2015 below 40ug/m3	2016 below 40ug/m3	2017 below 40ug/m3	2018 below 40ug/m3	
				PM10		below 40ug/m3	below 40ug/m3	below 40ug/m3	below 40ug/m3	
			Norwich	NO2	No data	12(LF); 55 (CM)	14 (LF); 56 (CM)	13 (LF); 51 (CM)	12 (LF); 54 (CM)	
				PM10		15 (LF); 21 (CM)	16 (LF); 20 (CM)	16 (LF); 23 (CM)	16 (LF); 27 (CM)	
			South Norfolk	NO2	No data	18.6µg/m3	25.9 ug/m3	25.0 ug/m3	25.0 ug/m3	
				PM10		N/A	N/A	N/A	N/A	
Percentage of SSSIs in favourable condition or unfavourable recovering condition	95% of SSSIs in 'favourable' or 'unfavourable recovering' condition	Natural England	Broadland		94%	94%	94%	94%	No data	
			Norwich		100%	100%	100%	100%		
			South Norfolk		93%	93%	93%	93%		
Number of listed buildings lost/demolished	None	LPA	Greater Norwich area		0	0	0	0	0	
			Broadland		0	0	0	0	0	
			Norwich		0	0	0	0	0	
			South Norfolk		0	0	0	0	0	
Percentage of new and converted dwellings on Previously Developed Land	25%	LPA	Broadland		54%	44%	46%	33%	36%	
			Norwich		88%	69%	93%	81%	86%	
			South Norfolk		28%	27%	9.4%	7.1%	9.1%	

Net change in local sites in “Positive Conservation Management”

- 3.58 Target has been achieved across the Greater Norwich area for increasing the proportion of sites in positive conservation management.
- 3.59 **The percentage of river assessed as good or better**
The percentage of rivers assessed as good or better has remained the same from the previous monitoring year.

Concentration of selected air pollutants

- 3.60 The pollution level in most areas of Greater Norwich are well below the recommended maximum. However, some specific locations form hotspots within Norwich. These include Castle Meadow and St Stephens where the concentration of nitrogen dioxide has been high. Buses and taxis are the main causes of these emissions. Norwich City Council is working on measures including traffic management and enforcement of Castle Meadow’s Low Emission Zone to address this issue. It is also important to view this in the context of there having recently been significant improvement in air quality in St Stephens and Castle Meadow. Please note this year’s data has not been ratified by DEFRA and as such it needs to be viewed with a degree of caution.

Percentage of Sites of Special Scientific Interest (SSSIs) in favourable condition or unfavourable recovering condition.

- 3.61 No comparable data has been released this year.

Number of listed buildings lost/demolished

- 3.62 The target was achieved as no listed building were lost or demolished this year.

Percentage of new and converted dwellings on Previously Developed Land

- 3.63 The target was achieved in Norwich and Broadland.

Objective 10: to be a place where people feel safe in their communities

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status
Reduction in overall crime	12/13 (pro rata)	Norfolk Police	Greater Norwich area	20,363	22,403	24,431	26,981	29,228	
	Broadland 3,871		Broadland	3,619	3,985	4,089	4,584	5,162	
	Norwich 14,409		Norwich	12,562	13,919	15,513	17,176	18,344	
	South Norfolk 4,033		South Norfolk	4,182	4,499	4,829	5,221	5,722	
Number of people killed or seriously injured in road traffic accidents	Year-on-year reduction in those KSI	Norfolk County Council	Greater Norwich area	196	173	194	177	210	
			Broadland	68	45	61	48	46	
			Norwich	65	58	63	57	85	
			South Norfolk	63	70	70	72	79	

Reduction in overall crime

3.64 There has been an increase in total crime in 2018/19. The Crime Survey of England and Wales continues to cite the impact of improvements in crime recording processes as a reason for increases in police recorded crime.

Number of people killed or seriously injured in road traffic accidents

3.65 The number of people killed or seriously injured in road traffic accidents has increased this year. The greatest increase is experienced in Norwich, where vulnerable road users such as pedestrians and cyclists make up the greatest number of casualties.

Objective 11: to encourage the development of healthy and active lifestyles

Indicator	Target	Source	Location	14/15	15/16	16/17	17/18	18/19	RAG status			
Percentage of working age population receiving Employment Support Allowance and incapacity benefits	In line with annual national average	DWP benefits claimants (NOMIS)	Greater Norwich area	5.50%	5.70%	Data discontinued	Data discontinued	Data discontinued				
			Broadland	4.40%	4.60%							
			Norwich	7.50%	7.80%							
			South Norfolk	4.10%	4.20%							
Life expectancy at birth of males and females	Increase at each survey	ONS	Broadland	Males	80.8	80.7	81.1	Data not yet released	Data not yet released	Green		
				Females	84.3	84.4	84.5					
			Norwich	Males	79.6	78.9	78.3			Data not yet released	Data not yet released	Red
				Females	82.9	82.9	82.8					
			South Norfolk	Males	81.7	81.4	81.3			Data not yet released	Data not yet released	Yellow
				Females	84.3	84.4	84.8					
Percentage of physically active adults	Increase percentage annually	Public Health England	Broadland	59.60%	62.10%	No data	63.00%	Data not yet released	Green			
			Norwich	61.10%	59.50%	No data	68.50%					
			South Norfolk	58.70%	63.40%	No data	69.10%					
Percentage of obese adults	Decrease percentage	Public Health England	Broadland	25.60%	No data	19.90%	22.80%	Data not yet released	Red			
			Norwich	19.60%		18.20%	22.50%					
			South Norfolk	23%		22.70%	21.90%					
Percentage of obese children (yr 6)	Decrease percentage	Public Health England	Broadland	14.80%	13.40%	13.90%	15.50%	Data not yet released	Red			
			Norwich	18.60%	18.60%	19.20%	18.70%					
			South Norfolk	16.30%	15.80%	14.60%	15.10%					
Health Impact Assessment	All development of 500+ dwellings to have health impact assessment	LPA	Broadland Norwich South Norfolk	Assume all relevant planning applications comply								
Accessibility of leisure and recreation facilities based on Sport England Active Places Power website	Trajectory to reduce by half the percentage of wards with less than the EoE average personal share of access to sports halls (2009 base = 67%), swimming pools (65%) and indoor bowls (12%)	LPA/Sport England		See table in para 3.72								

Percentage of working age population receiving Employment Support Allowance and incapacity benefits

3.66 The data for this indicator has been discontinued.

Life expectancy at birth

3.67 Life expectancy remained broadly the same as the previous year (2015-16).

Percentage of physically active adults

3.68 The latest release of data suggests there is an increasing proportion of physically active adults across all three districts.

Percentage of obese/overweight adults

3.69 There is an increasing proportion of obese/overweight adults in Broadland and Norwich, but a slight decrease in South Norfolk.

Percentage of obese children

3.70 There is a slight rise in the proportion of obese children in Broadland and South Norfolk and a slight decline in Norwich.

Health Impact Assessment

3.71 All relevant planning applications (over 300 homes) require health impact assessments in order to be validated/approved, so it is assumed that compliance with this indicator has been achieved.

Accessibility of leisure and recreation facilities

3.72 Data is not available for this indicator.

Area		14/15	15/16	16/17	17/18	18/19	RAG status
Greater Norwich area	Sports Halls Swimming Pool Indoor Bowls	No data	No data	No data	No data	No data	

Objective 12: to involve as many people as possible in new planning policy

Indicator	Target	Source	District	2011/12 – 2016/17	RAG status
Statement of Community Involvement	Statement of community involvement Less than 5 years old	LPA	Broadland	Adopted 2016	
			Norwich	Adopted 2016	
			South Norfolk	Adopted 2017	

Statement of Community Involvement/Engagement

- 3.73 The Statement of Community Involvements for all three districts were reviewed and revised in 2016 to standardise the approach to public involvement in plan making across the three districts and support the preparation of the new Greater Norwich Local Plan.

Appendices A to G see [webpage](#)

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**Annual Monitoring Report
2018-2019
January 2020**



Joint Core Strategy for Broadland, Norwich and South Norfolk

Appendices January 2020



Jobs, homes, prosperity for local people



Contents

Appendix A – Greater Norwich area Housing Land Supply Assessment 1st April 2019	1
Appendix B – CIL receipts	123
Appendix C – Duty to Cooperate	141
Appendix D – Update on Sustainability Appraisal Baseline.....	146
Appendix E - Broadland District Council Annual Monitoring Report 2018-19.....	153
Appendix F - Norwich City Council Report against policies in the adopted Norwich Development Management Policies Local Plan 2014	194
Appendix G: South Norfolk District Council Annual Monitoring Report 2018-19.....	233

Appendix A – Greater Norwich area Housing Land Supply Assessment 1st April 2019

Summary

This note sets out the housing land supply position for the Greater Norwich area for the period 1 April 2019 to 31 March 2024. The Revised National Planning Policy Framework (NPPF) requires local planning authorities to:

"identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old"

The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was adopted in March 2011, with amendments January 2014. The JCS became five years old on 10 January 2019. Although the Greater Norwich authorities have commenced work to replace the JCS, the current plan has not been reviewed in line with the PPG to demonstrate that the housing requirement does not require updating. Indeed, publication of a 2017 SHMA had already indicated the need to update the housing requirement. Therefore, in accordance with NPPF paragraph 73, the Greater Norwich housing land supply must be measured against local housing need (LHN).

The revised NPPF also introduced the Housing Delivery Test (HDT) as an annual measurement of housing delivery. The results of the first HDT were published on 19 February 2019. Broadland, Norwich and South Norfolk are measured jointly for the purposes of the HDT. The results of the HDT show that Greater Norwich has delivered 133% of the number of homes required between 2015/16 and 2017/18.

Policy 4 of the JCS sets out a three-district requirement, within which a policy decision was made to focus new allocations within a Norwich Policy Area. Similarly, the HDT is measured jointly across all of Broadland, Norwich and South Norfolk. LHN figures are only provided on a district basis, which can be aggregated up in accordance with Planning Practice Guidance. Lastly, the 2017 SHMA indicated that the vast majority of the three districts are within the same housing market area. Consequently, it is considered appropriate to measure land supply across this area. This approach effectively replaces that of separately measuring housing land supply across the Norwich Policy Area (NPA) and Rural Policy Areas (RPA) of Broadland and South Norfolk, although these areas are still considered in the AMR in relation to monitoring objective 2.

Based upon this interim calculation of five year housing land supply for Greater Norwich (including the 5% buffer required by the NPPF), the Greater Norwich Authorities can demonstrate:

- 118% (5.89 years / 1,899 home surplus)

Within each of the individual districts the following HLS can be demonstrated:

- Broadland: 170% (8.50 years / 1,935 home surplus)
- Norwich: 77% (4.03 years / 614 home deficit)

- **South Norfolk: 112% (5.61 years / 578 home surplus)**

Notwithstanding the existence of a housing land supply, the Greater Norwich Authorities recognise that further housing land, above and beyond the existing commitments, needs to be identified to 2038. The authorities have committed to the production of the Greater Norwich Local Plan (GNLP) to plan for these additional needs. Ahead of the adoption of the GNLP the authorities will continue to take a positive approach to development proposals that complement, rather than detract from, the existing and emerging development strategies.

Introduction

1. The policies of the Revised National Planning Policy Framework (NPPF) support Government's objective of "*significantly boosting the supply of homes*". This includes requiring local authorities to:

"identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old" (NPPF, para 73)

2. NPPF para 75 requires local authorities to "*monitor progress in building out sites which have permission*", with Government measuring housing delivery against the Housing Delivery Test (HDT).
3. In situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites; or where the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the previous three years, applications that involve the provision of housing must be determined in accordance with the presumption in favour of sustainable development.
4. For purposes of determining planning applications, NPPF para 11 sets out the presumption in favour of sustainable development as:

"approving development proposals that accord with an up-to-date development plan without delay; or

where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole".

5. The following sections of this report set out the issues that relate to housing land supply across Greater Norwich.
6. Irrespective of the housing land supply situation, the Greater Norwich Authorities will continue to:
 - i. take a positive approach to development proposals that complement, rather than detract from, the existing development strategy.
 - ii. work closely with partners in the development sectors and the LEP, and through initiatives such as the Local Infrastructure Fund and Housing Infrastructure Fund, to stimulate delivery on committed development sites. █

The Starting Point for Calculating the 5 year land supply

7. As set out in the Planning Practice Guidance:

"Housing requirement figures identified in strategic policies should be used as the starting point for calculating the 5 year land supply figure:

for the first 5 years of the plan, and

where the strategic housing policies plans are more than 5 years old, but have been reviewed and are found not to need updating.

In other circumstances, the starting point for calculating the 5 year land supply will be local housing need using the standard method"¹.

This echoes paragraph 73 of the NPPF.

8. The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was adopted in March 2011, with amendments January 2014. The JCS became five years old on 10 January 2019. Although the Greater Norwich authorities have commenced work to replace the JCS, the current plan has not been reviewed in line with the PPG to demonstrate that the housing requirement does not require updating. Indeed, publication of a 2017 SHMA² had already indicated the need to update the housing requirement. Therefore the NPPF requires the starting point for the calculation of housing land supply in Greater Norwich to be local housing need (LHN) as calculated using the standard methodology.
9. As the base date of the 5 Year Housing Land Supply (5YR HLS) Statement is 1 April 2019, the calculation of annual average household growth has been based on the period 2019 to 2029. The affordability ratios used for the purposes of calculating LHN adjustment factor were the 2018 ratios published on 28th March 2019, which are the most recent ratios available. A summary of this calculation is set out in table 1 below:

Table 1 Summary of LHN Calculation

	10 Year Average Household 2019-2029	2018 Median Affordability Ratio	Adjustment Factor	Annual LHN 2018 Based
BDC	396.8	9.23	1.33	527
NRW	504.9	7.03	1.19	601
SNC	690.8	8.78	1.30	897
Total Local Housing Need for Greater Norwich				2,024

¹ Paragraph 030 Reference ID:3-030-20180913

² Central Norfolk Strategic Housing Market Assessment, Opinion research Services, June 2017

Past Under Delivery of New Homes

10. The Planning Practice Guidance explains that the affordability adjustment is applied to the calculation of Local Housing Need to *"to take account of past under-delivery"*. As such *"the standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately"*³.
11. It is therefore not necessary to add in any uplift to take account of historic under-delivery against the JCS housing requirement when calculating LHN.
12. This approach is consistent with the principles established in Zurich Assurance Ltd v Winchester City Council [2014] EWHC 758 (admin) and the specific reasoning set out in Land on East Side of Green Road, Woolpit (APP/W3520/W/18/3194926)⁴.

Sources of Supply

Sites of 10 or more

13. Under the Revised NPPF glossary definition of *"Deliverable"*⁵, all development sites with detailed planning permission *"should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years"*. Where a major development only has outline permission or has only been allocated in a local plan there should be *"clear evidence that housing completions will begin on site within five years"*.
14. Each of the three Greater Norwich Authorities has taken a similar approach to collecting delivery information for major development sites. Developers of major sites with full or reserve matters planning permission have been approached, where appropriate, in order to establish their programme of delivery. Programmes provided by developers have then been reflected in the delivery forecast unless clear evidence has been identified that the site will not be delivered.
15. For sites with only outline permission or subject to allocation, the authorities have reviewed sites and approached developers to understand their delivery programme. Where there is clear evidence that housing completions will begin on site within five years, the relevant delivery forecasts have been included in the housing land supply assessment. Further justification that supports the forecasts is set out in Appendix C1. Wherever possible Statements of Common Ground confirming the developer's intentions have been included.

Sites of 9 or fewer

³ Paragraph: 011 Reference ID: 2a-11-20190220

⁴ Paragraph 64, page 12.

⁵ National Planning Policy Framework, February 2019, Page 66

16. Under the Revised NPPF glossary definition of “*Deliverable*”⁵ all sites which do not involve major development “*should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years*” .

17. The Greater Norwich authorities have assumed that all sites of 9 or fewer will be delivered over the 5-year period at an average annualised rate. However, this is subject to a lapse/non-implementation rate discount of 27%, in accordance with the finding set out in appendix D2.

Student Accommodation

18. The Planning Practice Guidance states that:

“All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market”.

and that

“To establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of students living in student only households, using the published census data”⁶.

On this basis the Greater Norwich Authorities have included deliverable developments of student accommodation in their housing forecast on the basis of a ratio of 1 home to each 2.5 student bedrooms.

Older Peoples Housing and Residential Institutions

19. The Planning Practice Guidance states that:

“Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published census data”.

20. On this basis the Greater Norwich Authorities have included deliverable developments of older peoples housing and residential institutions, such as residential care homes, in their housing forecast. For residential institutions this has been on the basis of a ratio of 1 home to each 8 units.

Windfall

21. The National Planning Practice Guidance states that

“A windfall allowance may be justified in the 5-year supply if a local planning

⁶ Paragraph: 042 Reference ID: 3-042-20180913

authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework”⁷.

22. The Greater Norwich authorities have undertaken an assessment of past Windfall completions on sites of 9 or fewer in Broadland and South Norfolk and across all sites in Norwich. A summary of this assessment is included in Appendix D1. The annual average number of windfall housing completions in each district has then been calculated. The annual average has then been discounted by a precautionary 33% to avoid over-estimation of supply. The discounted windfall average is then applied to the land supply assessment on a stepped basis in accordance with the table below:

Year 1	Year 2	Year 3	Year 4	Year 5
0%	33%	66%	100%	100%

23. This approach is consistent with that agreed by Norwich City Council during the Independent Examination of their Site Allocations DPD.
24. The exclusion of major sites in Broadland and South Norfolk and the precautionary discounting result in a windfall assessment that is a cautious short-term estimate. Longer term forecasts of windfall may need to take alternative approaches.

Methodology for Calculating Housing Land Supply

Monitoring of areas which have or are involved in the production of joint plans

25. The Planning Practice Guidance States that:

“Areas which have or are involved in the production of joint plans have the option to monitor their 5 year land supply and have the Housing Delivery Test applied over the whole of the joint planning area or on a single authority basis. The approach to using individual or combined housing requirement figures will be established through the plan-making process and will need to be set out in the strategic policies.”⁸

26. Broadland, Norwich and South Norfolk have an adopted joint plan in the form of the JCS. This plan seeks to jointly plan for and meet the development requirements of Greater Norwich. On the basis that there is a joint plan in place; that the three authorities are working together on a new joint plan to replace the JCS; and, that the Housing Delivery Test is measured jointly across the Greater Norwich Area, it stands to reason that the calculation of housing land supply should also be applied on this basis.
27. Whilst the JCS also includes a requirement to make a significant proportion of new allocations within the Norwich Policy Area, and both the NPA and the JCS settlement hierarchy continue to be important considerations in the

⁷ Paragraph: 24 Reference ID: 3-24-20140306

⁸ Planning Practice Guidance, Paragraph 046 Reference ID: 3-046-20180913

determination of planning applications, application of LHN, the HDT and the conclusion of the 2017 SHMA that the NPA is not a housing market area, mean that subdivision of the Greater Norwich Area for housing land supply purposes is no longer appropriate.

Calculating Local Housing Need where plans cover more than one area

28. The Planning Practice Guidance States that:

*"Local housing need assessments may cover more than one area, in particular where strategic policies are being produced jointly ... In such cases the housing need for the defined area should at least be the sum of the local housing need for each local planning authority within the area."*⁹

29. In accordance with this guidance, the Greater Norwich has LHN has been calculated by adding together the individual LHN for Broadland, Norwich and South Norfolk.

Housing Land Supply Buffer

30. The revised NPPF states that:

"The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

5% to ensure choice and competition in the market for land; or

10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year;

or

*20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply"*¹⁰.

31. Significant under delivery is measured against the Housing Delivery Test (HDT). The results of the first HDT were published on 19 February 2019, these remain the most recently published results of the HDT. Broadland, Norwich and South Norfolk are measured jointly for the purposes of the HDT. The results of the HDT show that Greater Norwich has delivered 133% of the number of homes required between 2015/16 and 2017/18.

32. On the basis of the results of the HDT and the fact the Broadland, Norwich and South Norfolk are not seeking to establish a 5 year supply through an annual

⁹ Planning Practice Guidance, Paragraph: 013 Reference ID:2a-013-20190220

¹⁰ Revised National Planning Policy Framework, February 2019, Paragraph 73

position statement, a 5% buffer needs to be added to the supply of deliverable sites in the Housing Land Supply calculation.

Housing Land Supply in Greater Norwich

33. Table 1 sets out the calculation of Housing Land Supply against the Standard Methodology for the calculation of Local Housing Need and takes account of the additional buffer required in accordance with the outcomes of the HDT.

Table 1 Greater Norwich 5YR HLS, 1 April 2019

Greater Norwich 5 Year Housing Land Supply Assessment		April 2019
LHN Annual Requirement		2,024
Requirement 1 April 2018 to 31 March 2023		10,121
Adjustment for Shortfall/Surplus		n/a
Plus NPPF HDT Buffer at 5%	10,121 x 0.05	506
Total 5 year requirement 2018/19 to 2022/23	10,121+ 506	10,627
Revised Annual Requirement	10,627 / 5 Years	2,125
Supply of Housing		12,526
Shortfall/Surplus of Supply	12,526 – 10,627	1,899
Supply in Years	12,526 / 2,125	5.89

Monitoring the Joint Core Strategy (JCS) Housing Requirement

34. For the reasons set out above, the housing requirement set out in the Joint Core Strategy (JCS) no longer forms part of the calculation of 5YR HLS in Greater Norwich.

35. Part 8, Section 34 (3) of The Town and Country Planning (Local Planning) (England) Regulations 2012 does however require that:

“(3) Where a policy specified in a local plan specifies an annual number, or a number relating to any other period of net additional dwellings or net additional affordable dwellings in any part of the local planning authority’s area, the local planning authority’s monitoring report must specify the relevant number for the part of the local planning authority’s area concerned —

(a) in the period in respect of which the report is made, and

(b) since the policy was first published, adopted or approved.”

36. To ensure that Broadland, Norwich and South Norfolk continue to comply with this requirement the Annual Monitoring Report will continue to monitor delivery against the JCS housing requirement within the monitoring year and since the base date of the JCS.

Conclusion

37. On the basis of the above it is clear that the Greater Norwich Authorities are able to demonstrate a 5 year housing land supply.

31st January 2020

Appendix A1 – Broadland Area 5 Year Land Supply Assessment

Broadland 5 Year Housing Land Supply Assessment		April 2019
LHN Annual Requirement		527
Requirement 1 April 2018 to 31 March 2023		2,633
Adjustment for Shortfall/Surplus		n/a
Plus NPPF HDT Buffer at 5%	2,633 x 0.05	132
Total 5 year requirement 2018/19 to 2022/23	2,633 + 132	2,764
Revised Annual Requirement	2,764 / 5 Years	553
Supply of Housing		4,699
Shortfall/Surplus of Supply	4,699 – 2,788	1,935
Supply in Years	4,699 / 553	8.50

Appendix A2 – Norwich Area 5 Year Land Supply Assessment

Norwich 5 Year Housing Land Supply Assessment		April 2019
LHN Annual Requirement		601
Requirement 1 April 2018 to 31 March 2023		3,003
Adjustment for Shortfall/Surplus		n/a
Plus NPPF HDT Buffer at 5%	$3,003 \times 0.05$	150
Total 5 year requirement 2018/19 to 2022/23	$3,003 + 150$	3,153
Revised Annual Requirement	3,153 / 5 Years	631
Supply of Housing		2,539
Shortfall/Surplus of Supply	$2,539 - 3,153$	-614
Supply in Years	2,539 / 631	4.03

Appendix A3 – South Norfolk Area 5 Year Land Supply Assessment

South Norfolk 5 Year Housing Land Supply Assessment		April 2019
LHN Annual Requirement		897
Requirement 1 April 2018 to 31 March 2023		4,486
Adjustment for Shortfall/Surplus		n/a
Plus NPPF HDT Buffer at 5%	4,486 x 0.05	224
Total 5 year requirement 2018/19 to 2022/23	4,486 + 224	4,710
Revised Annual Requirement	4,710 / 5 Years	942
Supply of Housing		5,288
Shortfall/Surplus of Supply	5,288 – 4,710	578
Supply in Years	5,288 / 942	5.61

APPENDIX B1 – BROADLAND SITES FORECAST

Parish	Address	Ref	App Type	Net Homes at 1/4/2019	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026 and Beyond
Acle	Land to North of, Springfield, Acle, Norwich, NR13 3JW	20140787	Full	6	6							
Acle	Land to North of, Springfield, Acle, Norwich, NR13 3JW	20152044	Reserved Matters	4	4							
Acle	Land north of Norwich Road, Acle, Norwich	20172189	Outline	140			24	36	36	36	5	
Acle	Land Adj. Hillside Farm,,,, Reedham Road, Acle, Norwich, NR13 3DF	20180941	Reserved Matters	30		15	15					
Aylsham	Land North of, Sir William's Lane,, Aylsham, Norwich	20140298	Reserved Matters	40	40							
Aylsham	Aegel House, Burgh Road, Aylsham, Norwich, NR11 6AS	20161711	Reserved Matters	22	5	17						
Blofield	Land Adj. 20, Yarmouth Road, Blofield, Norwich, NR13 4JS	20141710	Full	6	6							
Blofield	Former Piggeries, Manor Farm, Yarmouth Road, Blofield, Norwich, NR13 4JS	20150262	Full	13			3	5	5			
Blofield	Garden Farm, Land South of Yarmouth Road and North of Lingwood Road, Blofield, Norwich, NR13 4JG	20150700	Reserved Matters	21	21							
Blofield	Garden Farm,Phase 2, Land South of Yarmouth Road, Blofield, Norwich, NR13 4JG	20150794	Reserved Matters	20	20							
Blofield	Land off Blofield Corner Road, Blofield Heath, Norwich	20162199	Reserved Matters	36		18	18					
Blofield	Land to the north of Yarmouth Road, Blofield, Norwich	20172131	Reserved Matters	163	30	74	32	27				
Brundall	Land at Yarmouth Road, Postwick/Brundall, Norwich	20161483	Outline	155			10	26	26	26	26	41
Buxton with Lammas	Land North of Mead Close, Buxton With Lamas, Norwich, NR10 5EL	20150082	Outline	20						20		
Cawston	Land East of Gayford Road	CAW2	Allocation	20							20	
Coltishall	Land adj former Railway Line, Rectory Road, Coltishall, Norwich, NR12 7HR	20170075	Outline	30				30				
Coltishall	Land at Jordan's Scrapyard	COL2	Allocation	30					10	20		
Crostwick	Land adj St Marys Care Home, North Walsham Road, Spixworth, Norwich, NR12 7BZ	20150991	Full	18	9	9						
Drayton	Former David Rice Hospital Site, Drayton High Road, Drayton, Norwich	20170196	Outline	29						10	10	9
Drayton	Land off Drayton High Road, Drayton, Norwich	20170212	Full	71		5	25	25	16			
Drayton	Land Adj., Hall Lane, Drayton, Norwich	DRA1	Allocation	200						25	50	125
Drayton	Land East of School Road	DRA2	Allocation	20								

Freethorpe	Aitchison Brothers Garage, 75 The Green, Freethorpe, Norwich, NR13 3NY	20160632	Outline	19								
Freethorpe	Land north of Palmers Lane	FRE1	Allocation	10		5	4					
Great and Little Plumstead	Land at Former Little Plumstead Hospital, Hospital Road, Great Little Plumstead, Norwich, NR13 5EW	20130906	Outline	21								
Great and Little Plumstead	Little Plumstead Hospital West, Hospital Road, Little Plumstead, Norwich, NR13 5EW	20160808	Reserved Matters	35	35							
Great and Little Plumstead	Land to the North East Side of, Church Road, Great Plumstead, Norwich	20161151	Reserved Matters	11	11							
Great and Little Plumstead	Land off Rosebery Road, Great Plumstead, Norwich, NR13 5EA	20171999	Full	22	22							
Hellesdon	Phase 1, Royal Norwich Golf Club, Drayton High Road, Hellesdon, Norwich, NR6 5AH	20171514	Full	95	31	51	13					
Hellesdon	Royal Norwich Golf Club, Drayton High Road, Hellesdon, Norwich, NR6 5AH	20151770	Outline	892			57	70	70	70	70	555
Hellesdon	Land at Hospital Grounds, southwest of Drayton Road	HEL1	Allocation	300						25	50	225
Horsford	Land to the East of Holt Road, Horsford, Norwich	20161770	Full	254	34	73	62	54	31			
Horsford	Land West of Holt Road, Horsford, Norwich	20181136	Reserved Matters	84	25	35	24					
Horsham St. Faith and Newton St. Faith	Land East of Manor Road	HNF1	Allocation	69			30	39				
Morton on the Hill	Offices, Atlas Works, Norwich Road, Lenwade, Norwich, NR9 5SL	20160525	Full	22								
Postwick with Witton	Oaks Lane, Postwick, Norwich, NR13 5HD	20171116	Full	12		6	6					
Reedham	Land at Station Road, Reedham, Norwich	20151061	Full	19	11	8						
Reepham	New Road, Reepham	871709	Full	9								
Reepham	Land off Broomhill Lane	REP1	Allocation	120						20	40	60
South Walsham	Land West of Burlingham Road, South Walsham, Norwich, NR13 6DN	20161643	Outline	21			21					
Strumpshaw	Former Hamper People, 31, Norwich Road, Strumpshaw, Norwich, NR13 4AG	20150188	Full	10	10							
Strumpshaw	Land at Mill Road, Strumpshaw, Norwich	20171622	Reserved Matters	10	10							
Swannington	1-4 Station Road, Swannington, Norwich, NR9 5SY	20181400	Reserved Matters	6		6						
Taverham	Land off Beech Avenue, Taverham, Norwich	20172148	Outline	93		30	41	22				
Thorpe St.	Oasis Sport and Leisure Centre, 4	20151132	Outline	27								

Andrew	Pound Lane, Thorpe St Andrew, Norwich, NR7 OUB											
Thorpe St. Andrew	Land at Griffin Lane,, Thorpe St Andrew, Norwich	20160423	Reserved Matters	71							25	46
Thorpe St. Andrew	Pinebanks,9, Yarmouth Road, Thorpe St Andrew, Norwich, NR7 OEA	20160425	Reserved Matters	231							25	206
Thorpe St. Andrew	27 Yarmouth Road, Thorpe St Andrew, Norwich, NR7 OEE	20170811	Full	25	25							
x. Growth Triangle	Land at Brook Farm & Laurel Farm, Green Lane, Thorpe St Andrew, Norwich	20090886	Outline	600						22	45	533
x. Growth Triangle	Land to the North of Sprowston and Old Catton, Btn Wroxham Road & St Faiths Road, Sprowston, Norwich P1	20161058	Outline	733		25	125	150	150	150	133	
x. Growth Triangle	Land to the North of Sprowston and Old Catton, Btn Wroxham Road & St Faiths Road, Sprowston, Norwich P2&3	20161058	Outline	2,787						18	144	2,625
x. Growth Triangle	Phase 4, Blue Boar Lane, Sprowston, Norwich	20142051	Full	66	25	25	16					
x. Growth Triangle	Phase 5, Blue Boar Lane, Sprowston, Norwich	20131787	Full	1	1							
x. Growth Triangle	Phase 1a - Part 1, Land at Blue Boar Lane, Sprowston, Norwich	20130209	Reserved Matters									
x. Growth Triangle	Phase 1a - Part 2, Land at Blue Boar Lane, Sprowston, Norwich	20130224	Reserved Matters									
x. Growth Triangle	HH3 & HH4, Land at Blue Boar Lane, Sprowston, Norwich	20160751	Reserved Matters									
x. Growth Triangle	Parcel P3, Land at Blue Boar Lane, Sprowston, NR7 8RT	20160912	Reserved Matters	560	180	160	110	47	4			
x. Growth Triangle	Parcel P4, Land at Blue Boar Lane, Sprowston, Norwich, NR7 8RT	20160911	Reserved Matters									
x. Growth Triangle	Parcel TW2, Land at Blue Boar Lane, Sprowston, Norwich, NR7 8RN	20160928	Reserved Matters									
x. Growth Triangle	Parcels TW3 & TW4, Land at Blue Boar Lane, Sprowston, Norwich, NR7 8RN	20160930	Reserved Matters									
x. Growth Triangle	Land East of, Buxton Road, Spixworth, Norwich	20141725	Outline	225						20	40	165
x. Growth Triangle	Land off Salhouse Road,Rackheath	20151591	Reserved Matters	29	29							
x. Growth Triangle	Land off Salhouse Road, Rackheath, Norwich, NR13 6PE	20171906	Reserved Matters	10		10						
x. Growth Triangle	Land South of Moorsticks, Buxton Road, Spixworth, Norwich	20152035	Outline	19						19		
x. Growth Triangle	Land off Green Lane West, Rackheath, Norwich	20152081	Outline	50						25	25	
x. Growth Triangle	Land South of Green Lane East, Rackheath, Norwich	20160395	Outline	157			21	42	42	42	10	
x. Growth Triangle	Land South of Salhouse Road, Sprowston, Norwich P1	20160498	Outline	243		20	45	45	45	45	45	6
x. Growth Triangle	Land South of Salhouse Road, Sprowston, Norwich P2	20160498	Outline	560		10	100	100	100	100	60	50

x. Growth Triangle	Land South of Salhouse Road, Sprowston, Norwich	20170104	Outline	380		30	40	40	40	40	40	135
x. Growth Triangle	Racecourse Plantation, Plumstead Road East, Thorpe St Andrew, Norwich, NR7 9LW	20161896	Outline	300		15	50	75	75	75	10	
x. Growth Triangle	Land North of Smees Lane, Great Plumstead, Norwich	20180193	Outline	272						20	40	212
x. Growth Triangle	Land North of Smees Lane, Great Plumstead, Norwich	20180194	Outline	11						2	3	6
x. Growth Triangle	Land at St Faiths Road, Old Catton, Norwich	20180920	Reserved Matters	328	25	59	61	50	50	50	33	
x. Growth Triangle	Land East of Broadland Business Park	GT11	Allocation	315						20	65	230
x. Growth Triangle	Land East of Broadland Business Park	GT11	Allocation	235								235
x. Growth Triangle	Norwich RFU	GT13	Allocation	250						20	40	190
x. Growth Triangle	North Rackheath	GT16	Allocation	3,000						103	168	2,729
x. Growth Triangle	Land South of Green Lane West	GT18	Allocation	322				25	25	25	25	222
x. Growth Triangle	White House Farm (North East)	GT20	Allocation	516			70	122	146	120	58	
x. Growth Triangle	Land East of Broadland Business Park (North)	GT21	Allocation	350						20	45	285
x. Growth Triangle	Land North of Plumstead Road	GT8	Allocation	45						45		
			Sites of 9 or fewer	461	67	67	67	67	67			
			Discounted Windfall (Per Annum)	40		13	26	40	40	40	40	
			Total (Windfall included in yearly total only)	16,407	682	786	1,116	1,137	978	1,273	1,390	8,890

APPENDIX B2 – NORWICH SITES FORECAST

Parish	Address	Ref	App Type	Net Homes 1.4.19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	Beyond 2026
n/a	Anglia Square (extant permission not pursued, pre-app)	08/00974/F 18/00330/F	Full	198	0	0	0	0	0	0	0	0
n/a	Argyle Street (allocation)	14/01574/NF3 (demolition) CC11		12	0	0	9	0	0	0	0	0
n/a	Aylsham Road District Centre, 291-293 and land at Arminghall Close (allocation)	R21 16/00606/F	Full	100	0	0	0	0	0	0	0	0
n/a	Aylsham Road, 165-187 (allocation)	R22		20	0	0	0	0	0	0	0	0
n/a	Aylsham Road, 261-277 (allocation)	R12		50	0	0	0	0	0	0	0	0
n/a	Aylsham Road, Former Pupil Referral Unit (allocation)	R23		11	0	0	0	0	0	0	0	0
n/a	Barn Road Car Park (allocation)	C22 18/01315/F	Full	40	0	121	0	0	0	0	0	0
n/a	Barrack Street – CC17a (permission); CC17b and part CC17a (application) and Barrack Street / Whitefriars (application)	CC17a 15/01927/O	Outline Full	200	0	0	0	0	0	220	0	0
n/a	Barrack Street, 126-128 (allocation)	R16		15	0	0	0	0	0	0	0	0
n/a	Ber Street 147-153 (allocation)	CC2		20	0	0	0	0	0	0	0	0
n/a	Ber Street, 10-14 (allocation)	CC3		10	0	0	0	0	10	0	0	0
n/a	Ber Street, 60-70 (allocation)	CC1		20	0	0	0	0	0	0	0	0
n/a	Bethel Street, 59, Labour Club site (permission, unimplemented residue of consented 22)	08/00671/F	Full	14	0	0	0	0	0	0	0	0
n/a	Bethel Street, land to rear of City Hall (allocation)	CC24		20	0	0	0	0	0	0	0	0
n/a	Bishop Bridge Road, 29-31 (Box and Barrel Site) (extant permission, legal start)	R14 06/00166/F, 08/01316/D	Full	24	0	0	0	0	0	0	0	0
n/a	Bishop Bridge Road, Egyptian Road and Ketts Hill, land at (allocation)	R15 15/00756/F (Refused)		30	0	0	0	0	0	0	0	0
n/a	Bishop Bridge Road, land east of excl 29-31 Bishop Bridge Road (residue of allocation)	R14 15/00756/F (Refused) 18/00081/DEM Gas Holder)	Demolition	26	0	0	0	0	0	26	0	0
n/a	Bluebell Road, Bartram Mowers site (remainder of allocation)	R42 18/00265/F	Withdrawn	51	0	0	0	0	0	54	12	0

n/a	Bluebell Road, Blackdale Building (UEA residences) (6a) 915 beds, 401 in phase 2	R40 15/00121/F	Full	160	0	0	0	0	0	160	0	0
n/a	Bowthorpe Road, Norwich Community Hospital Site (allocation)	R37	Outline	80	0	0	0	0	0	0	0	0
n/a	Bracondale, Deal Ground (allocation) excludes May Gurney/Carrow Yacht Club site (SNDC) (permission)	R9 12/00875/O	Outline	580	0	0	0	0	0	0	0	0
n/a	Cattle Market Street, 23, St Peters House (prior approval/permission)	18/00830/PDD 17/01482/F	PDD/Full	61	20	20	21	0	0	0	0	0
n/a	City Road, 24, John Youngs Ltd (allocation)	R7		45	0	0	0	0	0	0	0	0
n/a	Colegate, 51, The Guildyard (prior approval)	15/01713/PDD	PDD	37	0	0	0	0	0	0	0	0
n/a	Constitution Hill, Constitution Motors	18/00917/O	Outline	12	6	6	0	0	0	0	0	0
n/a	Cremorne Lane, Utilities Site parts within Norwich (allocation)	R10 15/00997/F (withdrawn)	-	100	0	0	0	0	0	0	0	0
n/a	Dereham Road, land & buildings adjacent to & Including 349A & 349B	R34	-	24	0	0	0	0	0	0	0	0
n/a	Dereham Road, Site of former Earl of Leicester PH, 238a (allocation)	R33 10/00335/ET	-	12	0	0	0	0	0	0	0	0
n/a	Dibden Road, Van Dal Shoes and car park (allocation)	R17	-	25	0	0	0	0	0	20	20	0
n/a	Drayton Road, 81-93 (allocation)	R25	-	30	0	0	0	0	0	0	0	0
n/a	Drayton Road, adjoining Lime Kiln Mews (permission)	R24 15/00024/F & 18/00270/D (EXPIRED)	-	15	0	0	0	0	0	0	0	0
n/a	Duke Street, 36-42 (permission)	16/00699/F	Full	37	19	18	0	0	0	0	0	0
n/a	Duke Street, EEB site (prior approval, permission, part now expired)	CC21 14/01104/PDD (extant) 15/00916/F (EXPIRED)	-	30	0	0	0	0	0	0	0	0
n/a	Duke Street, Mary Chapman Court	18/01524/F	Full	40	0	0	40	0	0	0	0	0
n/a	Duke Street, St Crispins House (614 beds)	17/01391/F	Full	246	0	0	0	0	0	0	0	0
n/a	Duke Street, St Marys Works	16/01950/O (extant) 19/00430/F (withdrawn)	Outline	151	0	0	0	0	0	0	0	0
n/a	Garden Street, land at (allocation)	CC10	-	100	0	0	0	0	0	0	0	0
n/a	Gas Hill, Gas Holder (allocation)	R13	-	15	0	0	0	0	0	15	0	0
n/a	Goldsmith Street	R27 15/00272/F 17/00220/MA		56	44	0	0	0	0	12	0	0
n/a	Hall Road, Hewett Yard (allocation)	R4	-	20	0	0	0	0	0	0	0	0

n/a	Havers Road Industrial Sites (allocation)	R35	-	100	0	0	0	0	0	0	0	0
n/a	Heigham Street, 231-243 (allocation)	R28	-	25	0	0	0	0	0	0	0	0
n/a	Hurricane Way (allocation)	R29 - (A&B)	-	30	0	0	0	0	0	0	0	0
n/a	Ipswich Road, Norfolk Learning Difficulties Centre (allocation)	R2	-	30	0	0	0	0	10	0	0	0
n/a	Kerrison Road, Carrow Quay; land north of (permission), Norwich City Football Club (part) Groundsmans Hut (allocation)	(CC16) 11/02104/O, 13/01270/RM, 17/01091/F	-	323	149	73	101	0	0	0	0	0
n/a	Kerrison Road/Hardy Road, Gothic Works, inc ATB Laurence Scott (allocation)	R11	-	400	0	0	0	0	0	0	0	0
n/a	King Street, 125-129, 131-133 and Hoborough Lane (allocation)	CC7 07/00412/F 12/00215/ET (EXPIRED)	-	20	0	0	0	0	0	0	0	0
n/a	King Street, 191 (permission)	15/01810/F (expired)	Full	41	0	0	0	0	0	0	0	0
n/a	King Street, King Street Stores (allocation)	CC8	-	20	0	0	0	0	0	0	0	0
n/a	King Street, St Annes Wharf (permission).	CC6 04/00605/F	Full	351	87	88	88	88	0	0	0	0
n/a	Little John Road, Parish Hall/Vicarage Garden (permission)	10/01926/F	Full	5	5	0	0	0	0	0	0	0
n/a	Lower Clarence Road, car park (allocation)	CC13	-	45	0	0	0	0	0	0	0	0
n/a	Magdalen Road, 118 (site of former Elm Tavern) (permission)	10/02009/F	Full	11	11	0	0	0	0	0	0	0
n/a	Mile Cross Depot (allocation)	R36 18/01290/DEM	-	75	0	0	30	90	30	0	0	0
n/a	Mousehold Lane, Start Rite Factory site (allocation)	R18	-	40	0	0	0	0	0	15	0	0
n/a	Muspole Street, Seymour House (prior approval)	15/01512/PDD	PDD	23	0	0	0	0	0	0	0	0
n/a	Northumberland Street, 120-130 (permission)	R32 16/00835/F	Full	36	0	18	18	0	0	0	0	0
n/a	Oak Street / Sussex Street commercial sites, 160-162 Oak Street (allocation)	CC20	-	15	0	0	0	0	0	0	0	0
n/a	Oak Street, 140-154 (allocation)	CC18	-	10	0	0	0	0	0	0	0	0
n/a	Oak Street, 161 (permission) application submitted	18/00004/F	Full	40	0	23	17	0	0	0	0	0
n/a	Pottergate car park (allocation)	CC23	-	20	0	0	0	0	0	0	0	0
n/a	Pottergate, Kiln House, 27-43	18/01271/PDD 18/01270/PDD	PDD	35	8	9	9	9	0	0	0	0

n/a	Queens Road and Surrey Street (allocation)	CC29	-	40	0	0	0	0	0	101	0	0
n/a	Raynham Street, north of (allocation)	R26	-	40	0	0	0	0	0	0	0	0
n/a	Rose Lane and Mountergate, land at (allocation)	CC4	-	300	0	0	0	0	0	0	0	0
n/a	Somerleyton Street, Somerley Care Home, conv to student accommodation, 66 bedrooms	17/01515/F	Full	26	26	0	0	0	0	0	0	0
n/a	St Faiths Lane, 60 (permission)	17/00361/U	Full	41	0	0	0	0	0	0	0	0
n/a	St Georges Street, Merchants Court (prior approval/permission)	17/01811/PDD 16/01268/F	PDD/Full	37	0	0	0	0	0	0	0	0
n/a	St Mildreds Road, 112, conv to student accommodation, 34 bedrooms	17/01762/F	Full	14	0	14	0	0	0	0	0	0
n/a	St Stephen Street (6a) 702 beds	17/00357/F 18/01112/NMA	Full	282	282	0	0	0	0	0	0	0
n/a	Starling Road, Industrial sites; remainder of allocation (allocation) Part 1&2	R20	Full & Outline	23	0	0	0	0	0	9	19	0
n/a	Sussex Street, 70-72 (permission, legal start only) (allocation)	09/00296/F CC19	Full	17	0	0	0	0	0	0	0	0
n/a	Thorpe Road/Lower Clarence Road, Busseys Garage (allocation)	CC14	-	25	0	0	0	0	0	0	0	0
n/a	Thorpe Road: 13-17 Norwich Mail Centre (allocation)	CC15	-	150	0	0	0	0	0	0	0	0
n/a	Three Score, Bowthorpe	18/01586/RM 15/00298/RM 14/00874/RM 13/02031/RM 12/00703/O R38	Outline/ Reserved matters	847	18	48	26	100	100	100	100	355
n/a	Waterworks Road, Heigham Water Treatment Works (allocation)	R31	-	150	0	0	0	0	0	0	0	0
n/a	Westlegate 1-17, Boars Head Yard & St Stephens Street 1-9.	18/00652/PDD 18/00651/PDD 18/00642/F	PDD/Full	69	0	0	0	0	0	23	23	23
n/a	Westwick Street Car Park (allocation)	CC30	-	30	0	0	0	0	0	0	0	0
n/a	Westwick Street, BT Exchange Site (permission)	16/00456/F	Full	42	0	0	42	0	0	0	0	0
n/a	Windmill Road, land north of (permission)	R19 14/00847/F (expired)	Full	10	0	0	0	0	0	17	0	0
			Sites of 9 or fewer	307	44	44	44	44	44			
			Discounted Windfall (Per Annum)	123		40	82	123	123			
			Total (Windfall included in yearly total only)	6,882	719	522	527	454	317	772	174	378

APPENDIX B3 – SOUTH NORFOLK SITES FORECAST

Parish	Address	Ref	App Type	Net Homes at 1/4/2019	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026 and Beyond
Ashwellthorpe	r/o Wood Farm, The Street	2011/0506	Detailed	31	15	16						
Aslacion	Coopers Scrap Yard	2006/0171	Outline	15						15		
Barford	West of the Hall	BAR1	Allocation	10								10
Barnham Broom	Rush Green Road/Bell Road	2017/0100	Detailed	24	24							
Bawburgh	South of the Village Hall	2018/1550	Detailed	10			10					
Bracon Ash	Norwich Road	BRA1	Allocation	20								20
Bracon Ash	West of Long Lane	2017/2131	Detailed	15	4	8	3					
Brooke	High Green Farm	2014/2041	Detailed	11	5	6						
Caistor St Edmund	North of Heath Farm	2018/2232	Detailed	16						16		
Costessey	Queen's Hills/North of the River Tud	2007/1443	Detailed	37	37							
		2019/1683	Detailed	9			9					
Costessey	West of Lodge Farm	2013/0567 & 2016/0402	Detailed	279	49	54	60	60	39	17		
Costessey	Townhouse Road	2014/1440	Detailed	9	9							
Cringleford	Roundhouse Park	2018/0280 & 2018/0281	Outline	50		2	38	10				
Cringleford	Cringleford NP allocation - South of the A11	2018/2200	Detailed	650	5	111	100	100	100	100	100	34
		Various	Outline & part detailed	350		60	86	62	51	91		
		2018/2404	Detailed	7	7							
		2018/2835	Detailed	203	13	40	40	40	40	30		
		2018/2836	Detailed	90						10	40	40
Dickleburgh	Langmere Road	2016/0482	Detailed	14	14							
Dickleburgh	West of Norwich Road	2018/0980	Outline	22				11	11			
Diss	Frenze Hall Lane	2016/1566	Detailed	97	40	40	17					
Diss	Vinces Road	DIS1	Allocation	35				15	20			
Diss	Park Road	DIS2	Allocation	15								15
Diss	Former Hamlins Site	DIS6	Mixed-use allocation	13								13
Diss	Former Feather Factory	DIS7	Mixed-use allocation	17								17
Ditchingham	Tunney's Lane Field	2018/0121	Outline	24				12	12			
Earsham	Lodge Field, School Lane	2018/1317	Detailed	16	13	3						
Easton	South and east of the village	2014/2611	Outline	890		15	55	55	55	55	55	600
		EAS1	Allocation	64						30	34	
Gillingham	Norwich Road	2019/1013	Detailed	22		9	13					
Great Moulton	High Green	2015/2536	Detailed	7	2	2	2	1				

Hales	North of Yarmouth Road	HAL1	Allocation	10			20					
Hales	Former workshops, Yarmouth Road (The Old Forge)	2011/0026 & 2018/0092	Detailed	12	12							
Harleston	Spirkett's Lane/Limes Close	HAR4	Allocation	95						40	40	15
Harleston	Former Howard Rotavators	2017/0099	Detailed	35	20	15						
Harleston	Cranes Meadow	1998/1119	Detailed	9	4	4	1					
Hempnall	off Bungay Road	HEM1	Allocation	20			23					
Hethersett	North Village	2017/0151	Detailed	88	49	39						
		2018/2326	Detailed	181		17	57	55	49	3		
		2017/1104	Detailed	107	70	37						
		2018/2500	Detailed	191		23	80	80	8			
		2011/1804	Outline	405					73	130	99	103
Hethersett	North of Grove Raod	HET2	Allocation	40							40	
Little Melton	Gibbs Close	2015/1697	Detailed	23	12	9	2					
Little Melton	South of School Lane	2017/2843	Outline	30						15	15	
Loddon	Georges Lane	2016/0853	Detailed	126	38	38						50
Long Stratton	LNGS1 AAP Allocation	LNGS1 (part)	Allocation	600			15	20	20	35	35	475
		LNGS1 (part)	Allocation	1,200						75	100	1,025
Mulbarton	The Rosery/Long Lane	2014/0887	Detailed	12	12							
Newton Flotman	Flordon Road/Church Road	NEW1	Allocation									30
Poringland	The Street/South of Stoke Road	2010/1332	Detailed	45	26	19						
Poringland	West of The Street/North of Shotesham Road	2014/0319	Detailed	145		25	25	25	25	25	20	
Poringland	Heath Farm	2016/2388	Detailed	52	36	16						
Poringland	West of Octagon Barn	2015/2326	Detailed	60	19	32	9					
Pulham Market	Sycamore Farm	2018/0598	Detailed	10	5	5						
Rockland St Mary	off Bee Orchid Way	2017/1649	Detailed	21	21							
Roydon	Land of Denmark Lane	DIS3	Allocation	43			21	21				
Scole	West of Norwich Road	2019/0956	Detailed	18			18					
Scole	Old Norwich Road	SCO1	Allocation	15								15
Spooner Row	Chapel Lane/Bunwell Road	2014/2472 & 2016/2424	Detailed	16	8	8						
Stoke Holy Cross	South of Long Lane	2016/2153	Detailed	10	10							
Stoke Holy Cross	Chandler Road	2017/0616	Detailed	6	6							
Swardeston	Land off Bobbins Way	2017/2247	Detailed	38		6	24	8				
Swardeston	Main Road	SWA1	Allocation	30			15	15				

Stoke Holy Cross	South of Long Lane	2016/2153	Detailed	10	10							
Tacolneston	Land adj. The Fields	2017/0225	Outline	21		10	11					
Tasburgh	Church Road	TAS1	Allocation	20					10	10		
Tharston	Chequers Road	2014/0843	Detailed	18	18							
Thurlton	Beccles Road/Collage Raod	2017/2302	Detailed	25	25							
Trowse	White Horse Lane	2016/0803 & 2016/0805	Detailed	98	28	25	25	20				
Trowse	Devon Way/Hudson Avenue	2014/0981	Outline	75				15	30	30	8	
Trowse	May Gurney/Keir site & Carrow Yacht Club		Outline	90						20	50	20
Woodton	Rear of Georges House	WOO1	Allocation	22			22					
Wymondham	South Wymomdham	2015/1760	Detailed	14	14							
		2015/2380	Detailed	122	46	60	16					
		2015/1649	Detailed	31	31							
		2016/2586	Detailed	121	19	48	47	7				
		2015/2168	Detailed	103	54	36	13					
		2012/0371	Outline	577						50	50	477
Wymondham	London Road/Suton Lane	2014/2495 & 2018/2758	Outline & part detailed	335		50	50	50	50	50	50	35
Wymondham	Elm Farm, Norwich Common	2019/0536	Detailed	300		25	80	80	80	35		
Wymondham	Spinks Lane/Norwich Road	2014/2042	Detailed	85	85							
Wymondham	Carpenters Barn	2015/1405	Detailed	124	75	49						
Wymondham	Former WRFC	2014/0799	Outline	90						45	45	
Wymondham	Former Sale Gorund, Cemetery Lane	2016/2668	Outine	64			20	21	20	3		
Wymondham	Friarscroft Lane	WYM1	Allocation	14			14					
			Sites of 9 or fewer	857	125	125	125	125	125			
			Discounted Windfall (Per Annum)	65	0	21	43	65	65	65	65	65
			Total (Windfall included in yearly total only)	9,981	1,115	1,108	1,209	973	883	995	806	3,099



APPENDIX C1 – SITE FORMS

**Greater Norwich Area Housing Land Supply
Assessment at 1st April 2019**

Joint Delivery Statements Broadland

District

Site & Developer/Agent Details

Developer/Agent	Repton Homes
Reference	20172189
Location	Land North of Norwich Road, Acle, Norwich
Planning Status	Outline planning approval
Description of Development	Development of 137 residential units together with associated highway works

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
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Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
0	0	0	0	0

Commentary on Site Progress

An outline application (District Reference: 20141108) was granted on 30/01/2015 but subsequently lapsed on 30/01/2018 as no reserve matters application had been submitted. A replacement outline application for 140 dwellings (District Reference: 20172189) was approved on 25/05/2018. A reserved matters application was submitted on 31/07/2019. It is expected that this will be approved before the end of 2019/20.

The site is in the ownership of Norfolk County Council and there are no known viability, ownership or infrastructure constraints that would prevent the development of the site.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
0	0	24	36	36

Commentary on Delivery Forecast

Norfolk County Council has now resolved to deliver their sites through their property company: Repton. In December 2018 Repton appointed Norfolk based developer Lovell to build homes at its sites in Acle, Hopton and Attleborough.

The developer is planning to start on site in mid. 2020 and the delivery forecast was provided by Repton and it is consistent with their programme and sales expectations.

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council

Name: Paul Harris

Job Title: Principal Planning Officer (Spatial Planning)

Date: 20/11/2019

Developer/Agent: Repton Homes

Name: Simon Hughes

Job Title: Head of Property

Date: 21/11/2019

Site & Developer/Agent Details

Developer/Agent	Norfolk Homes Ltd
Reference	20161483
Location	Land at Yarmouth Road, Postwick/Brundall
Planning Status	Outline planning approval
Description of Development	Development of 155 dwellings, open space and vehicular access.

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
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Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
0	0	0	0	0

Commentary on Site Progress

An outline application for the scheme was submitted on 30/08/16 and was granted planning permission on 06/03/2018. Norfolk Homes submitted a Reserved Matters application (ref.20190604) on 29/03/19 with the expectation of achieving a detailed permission by the end of 2019.

There are no viability, ownership or infrastructure constraints that will prevent the development of the site.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
0	0	10	26	26

Commentary on Delivery Forecast

Subject to planning, Norfolk Homes intend to start on site in Spring/Summer 2020 and would expect first occupations in 12-18 months thereafter. Norfolk Homes submitted a revised delivery forecast in which expect to deliver 10 units in 2021/22 and approximately 26 units per year on the site thereafter.

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council

Developer/Agent: Norfolk Homes Ltd

Name: Diane Barr

Name: Jack Pointer

Job Title: Spatial Planning Support Officer

Job Title: Land and Planning Coordinator

Date: 02 December 2019

Date: 04 Dec 2019

Site & Developer/Agent Details

Developer/Agent	Crocus Homes
Reference	20170075
Location	Land adj. former Railway Line, Rectory Road, Coltishall
Planning Status	Outline planning approval
Description of Development	Development of 30 Dwellings and New Vehicular Access

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
---	---	--	---

Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
0	0	0	0	0

Commentary on Site Progress

Outline application 20170075 was submitted on 16/01/2017 by Messrs Smith & Lappin, and granted approval on 06/11/2017. The site subsequently went on the market and was purchased by Crocus homes in May 2019. Presently, informal discussions are being carried out with BDC Development Management on the site.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
-	-	-	30	-

Commentary on Delivery Forecast

Crocus homes are looking to start on site by the end 2021. Completion 2023.

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

<p>Local Authority: Broadland District Council</p> <p>Name: Diane Barr</p> <p>Job Title: Spatial Planning Support Officer</p> <p>Date: 02 December 2019</p>	<p>Developer/Agent: Crocus Homes</p> <p>Name: Christina Hack</p> <p>Job Title: Construction / Project Manager - Crocus</p> <p>Date: 09.12.2019</p>
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Site & Developer/Agent Details				
Developer/Agent	Strutt and Parker			
Reference	COL2			
Location	Land at Jordan's Scrapyard, Coltishall			
Planning Status	Allocation			
Description of Development	Allocated residential development of up to 30 dwellings			
Site Progress				
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
	2014/15	2015/16	2016/17	2017/18
	0	0	0	0
.				
Commentary on Site Progress				
Strutt & Parker have been discussing the best way forward with the landowners, who are still very keen to promote and develop this site.				
The agents report they will be shortly progressing with surveys, before they seek to engage with a developer to bring the site forward.				
Delivery Forecast				
.				
	2019/20	2020/21	2021/22	2022/23
	0	0	10	20
.				
Commentary on Delivery Forecast				
Although a developer has yet to be identified, given the activity in the area and conversions they have had, the agents believe they will be able to agree a future scheme.				
On the assumption that a scheme can be achieved, the agent provided a delivery forecast of 10 dwellings in 2021/2022 and the remaining 20 houses in 2022/2023.				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 				
and,				
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority: Broadland District Council		Developer/Agent: Strutt and Parker		
Name: Diane Barr		Name: Russell de Beer		
Job Title: Spatial Planning Support Officer		Job Title: Director		
Date: 26/11/2019		Date: 5th December 2019		

Site & Developer/Agent Details

Developer/Agent	Graham Craske
Reference	FRE1
Location	Land north of Palmer's Lane, Freethorpe
Planning Status	Allocation
Description of Development	Allocation for residential development of up to 10 dwellings

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
---	---	--	---

Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
0	0	0	0	0

Commentary on Site Progress

A full planning application (ref.20172048) by Wright Properties Ltd for 10 dwellings, Parking Areas, Access Road and Associated Works was submitted by Wright Properties (East Anglia) Ltd on 22/11/2017. This application was withdrawn by the applicant on 14/02/2018.

A full application for a revised proposal (ref.20181845) for 9 dwellings with parking areas, access driveway & associated site works was submitted by Wright Properties (East Anglia) Ltd on 13/11/2018. Concerns were raised by NCC Highways regarding visibility at the junction of Palmers Lane with the Green. Consequently, an agreement has been reached between the applicants and the owners of property on the corner of Palmers Lane/The Green to acquire some land for junction improvements.

Consent has been granted subject to Sec 106 agreement (not yet completed) for open space contributions.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
0	5	4	0	0

Commentary on Delivery Forecast

The agent reports commencement of construction is imminent, as soon as the Section 106 document has been agreed. It is anticipated that completion of dwellings will be progressive from summer 2020. The marketing agent confirmed the above forecast is as anticipated but added they will be attempting to complete all 9 in 2020 if all goes well.

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council	Developer/Agent: Graham Craske
Name: Diane Barr	Name: Graham Craske
Job Title: Spatial Planning Support Officer	Job Title: Chartered Architectural Technologist
Date: 02 December 2019	Date: 03 December 2019

Site & Developer/Agent Details				
Developer/Agent	Persimmon Homes			
Reference	20151770			
Location	Royal Norwich Golf Club, Drayton High Road, Hellesdon, Norwich, NR6 5AH			
Planning Status	Full Permission (Phase 1). Outline Planning Permission (remainder of site)			
Description of Development	Hybrid Application: 1. Outline proposals for the demolition of the existing club house and associated structures and development for up to 1,000 homes and 2. Detailed proposals for the first phase of 108 dwellings and associated infrastructure plus the off-site highway works to serve phase one and the overall scheme.			
Site Progress				
Total Homes Completed at 1st April 2019	0		Homes Under Construction at 1st April 2019	20
Number of Homes Completed by Year				
.				
	2014/15	2015/16	2016/17	2017/18
	-	-	-	-
.				
Commentary on Site Progress				
<p>A hybrid application (ref.20151770) was submitted for approval by Persimmon Homes Limited and Royal Norwich Golf Club on 30/10/2015. The application was for up to 1,000 dwellings and associated infrastructure including reserved matters for 108 dwellings being the first phase of the development. The application was approved on 06/12/2016 for the 108 dwellings with reserved matters and the remaining up to 892 being granted outline approval.</p> <p>Work commenced on the site, however, drainage issues led to a S73 application (ref. 20171514) being submitted on 01/09/2017 to split phase one into two parts. This application was approved on 28/06/2018. First completions have been delayed whilst the aforementioned drainage issues were resolved and compaction undertaken to address ground stability.</p> <p>1st phase of the site is now expected to yield circa. 95 dwellings as opposed to the 108 originally proposed. There are ongoing discussions about remainder of the site which may result in a reduction in the overall dwelling yield from the site and has led to a delay in the submission of the reserved matters for Phase 2.</p> <p>Persimmon Homes own the freehold of the land. The golf club have a lease on the land and relocated to their new site at Weston Park in September 2019 so the land needed for phases 2-3 is available. Wensum Valley Golf Club have taken a lease on the land on the west side of Drayton High Road which will end before the land is needed for commencement of Phases 4-6. Therefore there are no site ownership constraints in being able to deliver the development. Subject to the constraints identified above there is nothing that will prevent the site from being delivered in accordance with the developers forecast.</p>				
Delivery Forecast				
.				
	2019/20	2020/21	2021/22	2022/23
	32	51	70	70
.				

Commentary on Delivery Forecast

The site has commenced with constructed starting on the dwellings in phase one during September 2018. It is intended that the site will be sold through two outlets: Persimmon Homes & Charles Church. This will increase the overall number of completions that can be achieved on site.

Persimmon forecast that there will be 32 completions in 2019/20. If reserved matters consent for Phase 2 is granted by October 2020, the forecast is for 51 completions in 2020/21 with an average of approximately 70 completions year on year thereafter.

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council

Name: Paul Harris

Job Title: Principal Planning Officer (Spatial Planning)

Date: 02/12/2019

Developer/Agent: Persimmon Homes

Name: Laura Townes

Job Title: Head of Land and Planning

Date: 17 December 2019

Site & Developer/Agent Details

Developer/Agent	Lovell Partnerships Ltd.
Reference	HNF1
Location	Land East of Manor Road, Horsham & Newton St Faiths
Planning Status	Allocation
Description of Development	Erection of 69 Dwellings and Associated Infrastructure and Landscaping

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
---	---	--	---

Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Commentary on Site Progress

The site was allocated on 3rd May 2016. Following pre-application discussions, a full planning application (District Reference: 20182043) was submitted by housebuilder Lovell Partnerships on 29/01/2019. Full approval was granted on 19/12/2019.

Whilst there are a number of abnormal costs associated with the scheme, substantially related to drainage works, the site has been made viable through a reduction in affordable housing provision. Lovell Partnerships have confirmed that with the agreed level of affordable housing there are no ownership, infrastructure or viability constraints that will prevent the delivery of the site.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
0	0	30	39	0

Commentary on Delivery Forecast

Lovell Partnerships have confirmed that the delivery forecast is reflective of their planned delivery of the site.

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council

Name: Paul Harris

Job Title: Principal Planning Officer (Spatial Planning)

Date: 02 January 2020

Developer/Agent: Lovell Partnerships Ltd.

Name: Justin Coote

Job Title: Development Manager

Date: 02/01/2020

Site & Developer/Agent Details

Developer/Agent	Norfolk County Council
Reference	20161643
Location	Land West of Burlingham Road, South Walsham
Planning Status	Outline Planning Application
Description of Development	Residential Development of 21 Homes.

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
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Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Commentary on Site Progress

The outline planning application was submitted on 25/11/2016 and was approved 04/12/2017. Norfolk County Council has since resolved to sell the site and have identified a preferred purchaser, who is a housebuilder. The preferred purchaser is undertaking due diligence but both Norfolk County Council and purchaser expect a sale to be agreed by the end of 2019/20.

There are no know viability or infrastructure constraints that would prevent the site being developed. Some land needed for access to the site is within the ownership of a 3rd party, however an “in-principle” agreement has been reached over a purchase price. The agreed price would not undermine the viability or deliverability of the site.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
-	-	21	-	-

Commentary on Delivery Forecast

Should the sale be completed by the end of the financial year the preferred purchaser has confirmed that they would immediate begin work on a reserve matters application, which they would intend to submit within 6 months of purchase. On the assumption that a RM permission could then be achieved by the end of 2020/21, it would be their intention to start on site in early 2022. First completions would be expected within 6 months of the start on site and the whole site would be built by March 2022.

Developer’s Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council

Name: Paul Harris

Job Title: Principal Planning Officer (Spatial Planning)

Date: 20/11/2019

Developer/Agent: Repton Homes

Name: Simon Hughes

Job Title: Head of Property

Date: 21/11/2019

Site & Developer/Agent Details

Developer/Agent	Abel Homes
Reference	20172148
Location	Land off Beech Avenue, Taverham
Planning Status	Outline application
Description of Development	Development of up to 93 Dwellings With Associated Access

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
---	---	--	---

Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Commentary on Site Progress

An outline application for this site (ref: 201721480 was granted on 28/09/2018. The site was recently purchased by Abel Homes who submitted a reserved matters application (ref: 20191065) on 03/07/2019. It is expected that this will be approved before the end of 2019/20.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
-	30	41	22	-

Commentary on Delivery Forecast

(Please include confirmation of delivery intentions, anticipated start dates and build-out rates, with any supporting evidence on lead-in times and build-out rates on comparable sites where possible. Please note any assumptions used).

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council

Name: Diane Barr

Job Title: Spatial Planning Support Officer

Date: 02 December 2019

Developer/Agent: Abel Homes

Name: Dan Piper

Job Title: Technical Manager

Date: 09 December 2019

Site & Developer/Agent Details

Developer/Agent	Persimmon Homes, Hopkins Homes, Taylor Wimpey Homes
Reference	20080367 (Outline), 20130209, 20130224, 20160751, 20160912, 20160911, 20160928, 20160928 (Reserved Matters)
Location	Land at Blue Boar Lane, Sprowston
Planning Status	Reserved Matters Approval (Under Construction)
Description of Development	Erection of up to 1233 Dwellings Including Link Road, Recreation Areas, Primary School, Open Space and other Associated Works

Site Progress

Total Homes Completed at 1st April 2019	678	Homes Under Construction at 1st April 2019	137
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Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	39	198	198	243

Commentary on Site Progress

An outline application (20080367) was submitted on 07/03/2008, the first council resolution to grant permission was made on 13/08/2008. Permission was not, however, issued until 23/05/2011 due to complicated negotiations on the S106 primarily related to viability issues in the immediate aftermath of the global financial crisis.

Following the grant of outline planning consent a first tranche of reserved matters applications across phase 1 of the development was then submitted (20130696, 20130699, 20130209 & 20130224) by the development consortium of Persimmon Homes, Taylor Wimpey and Hopkins Homes. These applications were determined between 21/05/2013 and 16/08/2013. The first housing completions were delivered in the 15/16 monitoring year and the site has delivered strongly since. There now exists reserved matters consents across the whole of the development following the submission and determination of additional reserved matters applications (20160751, 20160928, 20160930, 20160912 & 20160911).

The site is wholly within the ownership of the development consortium and there are no known viability, ownership or infrastructure constraints that will prevent the delivery of the site.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
180	178	92	47	4

Commentary on Delivery Forecast

Development has now started across all but two of the reserved matters permissions. Persimmon Homes forecast that they will continue to deliver at a rate of approximately 70pa across their element of the site and anticipate that they will have completed this phase of the White House Farm development and moved onto the next phase (allocated under Growth Triangle AAP Policy GT20) by Q2 2021. Hopkins Homes forecast that they will deliver at a rate of approximately 54pa and Taylor Wimpey at 56pa.

The developers' have exceeded their anticipated build out rate (160pa total) over the last two monitoring periods.

An area of land comprising 54 dwellings (on the Taylor Wimpey parcel) is subject to a restriction on delivery until August 2024.

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council

Developer/Agent: Persimmon Homes

Name: Paul Harris

Name: Laura Townes

Job Title: Principal Planning Officer (Spatial Planning)

Job Title: Head of Land and Planning

Date: 02/12/2019

Date: 17 December 2019

Site & Developer/Agent Details

Developer/Agent	Lovell
Reference	20160395
Location	Land South of Green Land East, Rackheath
Planning Status	Outline Planning Permission
Description of Development	Development of up to 157 Dwellings together with Associated Access, Open Spaces & Infrastructure

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
---	---	--	---

Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Commentary on Site Progress

The site was allocated in July 2016. An outline planning application was submitted on 09/03/2016. Outline planning permission was granted on 31/01/2019. The delay in granting permission resulted from complicated negotiations to resolve drainage and access issues.

Lovell submitted a Reserved Matters application on 01/07/2019. This is expected to be determined in 2020/21. Lovell have confirmed that there are no viability, ownership or infrastructure constraints that will prevent the development of the site.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
-	-	21	42	42

Commentary on Delivery Forecast

Subject to the grant of Reserve Matters permission, it can be expected that a start on site will be made during 2020/21 with the first completions achieved in 21/22. It would be reasonable to assume an average yearly rate of approximately 42 homes per annum. 50% of annual average rate is assumed in the first full year of construction.

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council

Name: Paul Harris

Job Title: Principal Planning Officer (Spatial Planning)

Date: 02/12/2019

Developer/Agent: Lovell

Name: J Coote

Job Title: Development Manager

Date: 19/12/2019

Site & Developer/Agent Details

Developer/Agent	Barratt David Wilson Homes (Eastern Counties)
Reference	20160498
Location	Land South of Salhouse Road, Sprowston
Planning Status	Outline Planning Permission
Description of Development	Proposed residential development of a minimum of 803 dwellings with access road and associated infrastructure ...

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
---	---	--	---

Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Commentary on Site Progress

The outline application for the site was submitted on 05/04/2016, slightly in advance of the confirmation of the site's allocations through the Growth Triangle Area Action plan in July 2016. A Council resolution to grant planning permission was given on 01/11/2017. Outline consent was granted on 07/03/19. The delay to the grant of planning permission was principally due to complicated negotiations that resulted from there being the two separate but inherently inter-related applications that were submitted on the GT7 allocation site.

The 1st phase of the site has been purchased by Kier Living. Barratt David Wilson Homes (BDWH) are in advanced negotiations to purchase the remainder of the site.

There are no known viability, ownership or infrastructure constraints that would prevent the development of the site.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
-	10	100	100	100

Commentary on Delivery Forecast

Barratt Home intend to submit a Reserve Matters application by January 2020, subject to a timely consent this will enable a start on site in October 2020.

BDWH anticipates the following delivery programme 20/21 = 10 completions, 21/22 = 100, 22/23 = 100, 23/24 = 100, 24/25 = 100, 2025/26 = 60, 2026/27 = 50. This rate is consistent with their experience of the local market

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council	Developer/Agent: Barratt David Wilson Homes (Eastern Counties)
Name: Paul Harris	Name: Ray Houghton
Job Title: Principal Planning Officer (Spatial Planning)	Job Title: Head of Planning
Date: 27/11/2019	Date: 28/11/2019

Site & Developer/Agent Details

Developer/Agent	Halsbury Homes
Reference	20107104 & 20190485
Location	Land South of Salhouse Road, Sprowston
Planning Status	Outline Planning Permission at 1 April 2019. Reserve Matters Permission granted on 18 July 2019.
Description of Development	Reserved Matters Application for Details of Appearance, Layout, Landscaping and Scale of 365 dwellings following Outline Planning Permission 20170104

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
---	---	--	---

Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Commentary on Site Progress

The outline application for the site was submitted on 25/01/2017. Permission was granted on 06/12/18.

The site has now been purchased by Halsbury Homes. A Reserved Matters Application (20190485) was submitted on 22/03/2019. Reserved Matters Permission was issued on 18/07/2019.

There are no known viability, ownership or infrastructure constraints that will prevent the development of the site.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
0	30	40	40	40

Commentary on Delivery Forecast

Halsbury Homes expect to start on site in 2020.

Halsbury anticipates the following delivery programme 20/21 = 30 completions, 21/22 = 40, 22/23 = 40, 23/24 = 40, 24/25 = 40, 2025/26 = 40. This rate is consistent with their experience of the local market.

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council	Developer/Agent: Halsbury Homes
Name: Paul Harris	Name: James Millard
Job Title: Principal Planning Officer (Spatial Planning)	Job Title: Land Manager
Date: 27/11/2019	Date: 19/12/2019

Site & Developer/Agent Details	
Developer/Agent	TOWN
Reference	20161058
Location	Land to the North of Sprowston and Old Catton, Btn Wroxham Road and St Faiths Road
Planning Status	Outline Planning Approval. Reserved matters for phase one infrastructure approval in principle
Description of Development	Up to 3,520 dwellings, up to 16,800 sqm employment space; up to 8,800sqm for shops, services etc and associated infrastructure

Site Progress			
Total Homes Completed at 1 st April 2019	0	Homes Under Construction at 1 st April 2019	0

Number of Homes Completed by Year				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Commentary on Site Progress

The Beeston Park scheme was originally submitted as an outline application by Beyond Green Developments Ltd, a wholly owned subsidiary of U&I Group PLC (formerly Development Securities PLC) on 23/10/2012 (District Reference 20121516), receiving a Council resolution to grant planning permission on 29/09/2013. Complex negotiations on the S106 agreement across multiple landowning parties meant that planning permission was not actually issued until 17/02/2016.

No strategic investment partner was ultimately secured to deliver the original permission. This situation did not result from the scheme being deemed unviable but rather the scale of the upfront capital tie in needed to deliver the most costly (in infrastructure terms) element of the scheme first, as per the scheme's original phasing.

Consequently, a S.73 application (reference 20161058) was submitted on in 2016. This application amended the phasing of the scheme to enable the delivery of the lowest cost infrastructure section of the scheme first. This application received a resolution to grant planning permission on 12/10/2016. Permission was issued on 22/12/2017. Subsequently applications for the discharge of conditions related to the site wide design code (reference 20180412), and phase 1 strategic infrastructure (reference 20180708) were submitted. The site wide design code has now been approved and the strategic infrastructure is subject to a Council Resolution to Grant Planning Permission.

The landowners remain committed to the scheme and have entered into an equalisation agreement to facilitate the delivery of the development. Now that the Broadland Northway is open to traffic there are no external infrastructure constraints to development that would not be overcome through the delivery of off-site and on-site public infrastructure works. The necessary enabling works for phase 1 can be viably delivered.

Delivery Forecast				
2019/20	2020/21	2021/22	2022/23	2023/24
0	25	125	150	150

Commentary on Delivery Forecast

Phase 1 of the revised permission comprises 3 parcels of land capable of delivering circa. 733 of the 3,520 homes permitted across the whole site. TOWN on behalf of the U&I investment have now secured an “in-principle” agreement with the landowners to acquire phase 1. In addition, £9.2M of development funding has been secured through Homes England’s Home Builders Fund that will be used to deliver the phase one strategic infrastructure.

The site has actively been marketed to developers, negotiations that took place during 2019/20 have now reached an advanced stage with multiple developers who will take on different elements of phase 1 of the development. Subject to finalising pre-sales commitment from the interested developer, TOWN intend to complete the purchase of phase 1 and procure contractors to deliver enabling infrastructure during 2020. Whilst the implementation of enabling infrastructure has been delayed from that which was expected in 2019 it will still enable development to commence on site in a timely manner in accordance with the above trajectory.

It is the intention is that land will be released for development across parcels A and B. This will enable simultaneously delivery by two or more development partners with the first homes being occupied during 2021. The development forecast reflects only the expected delivery across phase 1 of the scheme.

It is however notable that in March 2018 Norfolk County Council, on behalf of the Greater Norwich Growth Board submitted a final Business Case to the Housing Infrastructure Fund (HIF): Forward Fund for the Broadland Growth Triangle. If successful the HIF grant would fund roads, associated drainage and Strategic Public Open Space infrastructure across Phases 2 and 3 of the scheme. At the time of writing the outcome of the HIF bid is awaited.

Notwithstanding the above, the detailed design for strategic infrastructure across phases 2&3 is currently underway and reserve matters applications for this infrastructure is expected to be submitted during 2020. Delivery of HIF infrastructure will enable further development sites to be opened up across the Beeston Park site, which will significantly accelerating the delivery of housing beyond the levels identified in the current forecast.

Developer’s Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland

Name: Paul Harris

Job Title: Principal Planning Officer (Spatial Planning)

Date: 25/11/2019

Developer/Agent: TOWN

Name: Mike Bodkin

Job Title: Project Director

Date: 04/12/2019

Site & Developer/Agent Details

Developer/Agent	Norfolk Homes
Reference	GT18 (20171464)
Location	Land South of Green Lane West, Rackheath
Planning Status	Allocation (Application for Full Permission submitted)
Description of Development	Construction of 322 Dwellings & Associated Works

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
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Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Commentary on Site Progress

A full planning application was submitted on 31/08/2017. Broadland's planning committee resolved to grant planning permission on 10/04/2019.

There are no known viability or infrastructure constraints. Norfolk Homes hold an option on the land. Whilst a final price still needs to be agreed and the option taken up, Norfolk Homes do not believe there are any significant barrier to delivery of the site once planning permission is granted.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
-	-	-	25	25

Commentary on Delivery Forecast

Subject to the timely grant of permission, and taking account of the need to agree a price and take up option, Norfolk Homes expect to start in early 2021. Norfolk homes expect first occupations about 12-18 months from the start date and would intend to build at around 25 units per year. The delivery forecast is consistent the Norfolk Homes's intended delivery timescale.

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council

Name: Paul Harris

Job Title: Principal Planning Officer (Spatial Planning)

Date: 02/12/2019

Developer/Agent: Norfolk Homes

Name: Jack Pointer

Job Title: Land and Planning Coordinator

Date: 04/12/2019

Site & Developer/Agent Details

Developer/Agent	Persimmon Homes, Hopkins Homes, Taylor Wimpey Homes
Reference	GT20
Location	White House Farm (North East)
Planning Status	Allocation (Hybrid Planning Application Submitted, 20191370).
Description of Development	Erection of 516 dwellings, including associated infrastructure.

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
---	---	--	---

Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Commentary on Site Progress

Allocation site GT20 is under an option agreement to the same development consortium (Persimmon Homes, Hopkins Homes & Taylor Wimpey Homes) who are currently building out the 1,233 home White House Farm development site (district reference 20080367), that lies adjacent to this site.

The consortium have confirmed that infrastructure installed as part of the current development has been sized to facilitate the development of GT20 and that their intention to move onto this site promptly once the construction of the adjacent White House Farm site is complete. To enable this an application (District Reference: 20191370) was submitted on 29/08/2019 that seeks outline permission for 516 dwellings (to be split equally amongst the three consortium members) and detailed consent for the highway access. The lead consortium member (Persimmon Homes) has confirmed that early work has already begun on a Reserved Matters submission.

Due to consultation responses received in the determination of the outline planning application the masterplan has been updated reducing the number of dwellings to 456 (152 per developer). The expectation is that the planning application will be determined at March 2020 planning committee with reserved matters applications submitted soon afterwards.

The site is under option to the development consortium and there are no known viability, ownership or infrastructure constraints that will prevent the delivery of the site.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
-	-	70	122	146

Commentary on Delivery Forecast

Persimmon Homes expect that they will have completed construction on their first White House Farm site (district reference 20080367) and moved onto GT20 by Q2 2021. They forecast that they will continue to build-out at a rate of approximately 70dpa. Hopkins Homes expect to have moved onto GT21 by Q1 2023, building out at a rate of approximately 54-60dpa. Taylor Wimpey expect to have moved onto GT21 by Q3 2022, building out at a rate of approximately 60dpa.

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council

Developer/Agent: Persimmon Homes

Name: Paul Harris

Name: Laura Townes

Job Title: Principal Planning Officer (Spatial Planning)

Job Title: Head of Land and Planning

Date: 02/12/2019

Date: 17 December 2019

Site & Developer/Agent Details

Developer/Agent	Socially Conscious Capital Ltd (SCC) / Strutt & Parker
Reference	20161896
Location	Racecourse Plantation, Plumstead Road
Planning Status	Outline Planning Permission.
Description of Development	Erection of up to 300 New Homes and the Creation of a New Community Woodland Park (Outline)

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
---	---	--	---

Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Commentary on Site Progress

An outline application for the development of the site was submitted on 01/11/2016. The application was refused on 14/06/2017. The decision to refuse the application was subsequently appealed. The appeal was allowed and outline planning permission was granted for the development on 30/01/2019.

Following the planning permission becoming immune from challenge, SCC has been preparing to market the development site for sale to a developer and consulting on the options for the new Community Woodland Park.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
-	15	50	75	75

Commentary on Delivery Forecast

The marketing campaign will be launched in February 2020 and we expect to have completed the sale to a developer by summer 2020. The developer will then prepare and submit an application for reserved matters and will discharge the pre-commencement conditions during the second half of 2020 and beginning of 2021. Therefore, we currently anticipate the development commencing in the year 2021. There are 201 new market homes and 99 new affordable homes; we expect the developer to build out at a rate of 35 - 50 market homes per annum, while the affordable homes will likely be built out more quickly than that, so it will take approximately 4 - 5 years for the development to be completed.

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council	Developer/Agent: Socially Conscious Capital
Name: Paul Harris	Name: Rock Feilding-Mellen
Job Title: Principal Planning Officer (Spatial Planning)	Job Title: Director
Date: 13/12/2019	Date: 02/12/2019

Site & Developer/Agent Details				
Developer/Agent	Kier Living			
Reference	20160498 & 20190758			
Location	Land South of Salhouse Road, Sprowston			
Planning Status	Outline Planning Permission at 1 April 2019. Reserve Matters Permission granted on 25 October 2019.			
Description of Development	Reserved Matters following grant of Outline Planning Permission 20160498 for the Phase 1 Residential Development comprising 251 Houses			
Site Progress				
Total Homes Completed at 1 st April 2019	0		Homes Under Construction at 1 st April 2019	0
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
.				
Commentary on Site Progress				
<p>The outline application for the site was submitted on 05/04/2016, slightly in advance of the confirmation of the sites allocations through the Growth Triangle Area Action plan in July 2016. A Council resolution to grant planning permission was given on 01/11/2017. Permission was granted on 07/03/19. The delay to the grant of planning permission was principally due to complicated negotiations that resulted from their being the two separate but inherently interrelated applications that were submitted on the GT7 allocation site.</p> <p>The 1st phase of the site has been purchased by Kier Living. A Reserve Matter Application (20190758) for phase 1 was submitted on 07/05/2019. Reserved Matters Permission was issued on 25/10/2019.</p> <p>There are no known viability, ownership or infrastructure constraints that will prevent the development of the site.</p>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
-	-	20	45	45
.				
Commentary on Delivery Forecast				
<p>Kier Living have met their programme expectations of achieving Reserve Matters consent by Autumn 2019, this will enable a start on site in early 2020.</p> <p>Kier anticipates the following delivery programme 20/21 = 20 completions, 21/22 = 45, 22/23 = 45, 23/24 = 43, 24/25 = 45, 2025/26 = 45, 2026/27 = 8. This rate is consistent with their experience of the local market.</p>				
Developer's Declaration				
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p>				

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: Broadland District Council

Name: Paul Harris

Job Title: Principal Planning Officer (Spatial Planning)

Date: 27/11/2019

Developer/Agent: Kier Living

Name: James Griffiths

Job Title: Head of Planning

Date: 30/01/2020

**Greater Norwich Area Housing Land Supply
Assessment at 1st April 2019**

Joint Delivery Statements

Norwich City

Site & Developer/Agent Details					
Developer/Agent	Norwich City Council				
Reference	R38				
Location	Threescore				
Planning Status	Allocation / consent				
Description of Development	Urban extension				
Site Progress					
Total Homes Completed at 1st April 2019	54	Homes Under Construction at 1st April 2019	18		
Number of Homes Completed by Year					
	2014/15	2015/16	2016/17	2017/18	2018/19
	0	0	0	2	59
Commentary on Site Progress					
<p>Outline consent 12/0703/O was granted in 2013 for redevelopment of site with up to 1000 homes including affordable housing, care home, a new open space and associated roads and infrastructure.</p> <p>Phase 1 – a care village comprising dementia care and housing with care units – is now complete (planning ref 13/02031/RM)</p> <p>Norwich Regeneration Limited (NRL), a private limited company wholly owned by Norwich City Council, is currently delivering phase 2.</p>					
Delivery Forecast					
	2019/20	2020/21	2021/22	2022/23	2023/24
	18 (now complete)	48	26	100	100
Commentary on Delivery Forecast					
<p>The site is owned by Norwich City Council.</p> <p>Phase 2 has planning consent (15/00298/RM) for erection of 172 dwellings and associated works in association with 13/02809/VC. This development began in May 2017 and is expected to be completed by 2021/22. The Rayne Park part of the development (section 1) is now complete (79 units). Future elements of phase 2 are expected to be completed within the next couple of years: 26 units on section 2 in 2021/22, and 48 units on sections 3 and 4 in 2020/21. It is anticipated that phase 2 will deliver approximately 153 units of housing overall, rather than the 172 envisaged by the consent.</p> <p>Remainder of the allocation: NRL's business plan envisages development of 100 units on Phase 3 in 2022/23 (no current consent). Beyond that, it is envisaged that the site will be developed out by 2 operators averaging approximately 100 units per annum going forward.</p>					
Developer's Declaration					
I confirm that:					

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.
- and,
- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: NORWICH CITY COUNCIL

Name: C. HULLIBELL

Job Title: PLANNER

Date: 9/1/20

Developer/Agent:

Name: Graham Nelson

Job Title: Director of Regeneration and Development

Date: 11 December 2019

Site & Developer/Agent Details			
Developer/Agent	CAM Architects		
Reference	18/00917/O		
Location	Constitution Motors, Constitution Hill		
Planning Status	Permission.		
Description of Development	Outline application with all matters reserved for the erection of up to 12 dwellings.		
Site Progress			
Total Homes Completed at 1st April 2019	zero	Homes Under Construction at 1st April 2019	zero
Number of Homes Completed by Year			
2014/15	2015/16	2016/17	2017/18
Commentary on Site Progress			
<i>Reserved matters application awaiting decision ref: 19/01031/RM</i>			
Delivery Forecast			
2019/20	2020/21	2021/22	2022/23
6	6		
Commentary on Delivery Forecast			
<i>Developer looking to start work on-site as soon as possible pending reserved matters application outcome and mostly, pending agreement on viability assessment submitted with the reserved matters application.</i>			
Developer's Declaration			
I confirm that:			
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 			
and,			
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 			
Local Authority: NORWICH CITY COUNCIL		Developer/Agent:	
Name: C. HOLLISSE		Name: CAM Architects (Norwich) Ltd	
Job Title: PLANNER		Job Title: Agent	
Date: 17/12/19		Date: 18/11/19	

Site & Developer/Agent Details

Developer/Agent	Nigel Handley
Reference	16/00456/F
Location	BT Exchange Westwick Street
Planning Status	Permission
Description of Development	42 UNIT RESIDENTIAL FLAT SCHEME

Site Progress

Total Homes Completed at 1 st April 2019	NONE	Homes Under Construction at 1 st April 2019	NONE
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Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
—	—	—	—	—

Commentary on Site Progress

(Please see guidance in email) SITE HAS A DETAILED PLANNING PERMISSION. FINANCE IN PLACE.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
		42		

Commentary on Delivery Forecast

(Please see guidance in email) PROFESSIONALS ARE INSTRUCTED TO DISCHARGE ALL PLANNING CONDITIONS BY END OF MARCH 2020. WORK TO SITE WILL COMMENCE IN FEB 2021. BUILD PERIOD 50 WEEKS. FINANCE IN PLACE

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority: NORWICH CITY COUNCIL	Developer/Agent: OWNER WINSUM DEVELOPMENTS LTD
Name: C. HUNSELL	Name: NIGEL HANDLEY
Job Title: PLANNER	Job Title: DIRECTOR
Date: 17/12/19.	Date: 12/12/2019

* NOTE : WINSUM DEVELOPMENTS LTD IS A SPV COMPANY FOR THIS SITE ONLY. AS SUCH THIS DEVELOPER/OWNER IN THIS COMPANY HAS NO OTHER HOMES COMPLETED. ULTIMATE PARENT COMPANY IS R. G. CARTER GROUP LTD.



Site & Developer/Agent Details			
Developer/Agent	Developer - Boudica Developments		
Reference	R18 18/01772/F		
Location	Mousehold Lane Start Rite Factory site		
Planning Status	Allocation		
Description of Development	79 bed care home and 42 unit supported living comprising of 36 one bed units and 6 two bed units.		
Site Progress			
Total Homes Completed at 1 st April 2019	0	Homes Under Construction at 1 st April 2019	0
Number of Homes Completed by Year			
2014/15	2015/16	2016/17	2017/18
Commentary on Site Progress			
<p>The site has achieved the above planning consent. We are expecting to commence on site for the care home 2nd quarter 2020. The scheme for the supported living is being re designed currently- we would expect a revised application Q3 2020 and a most likely start on site (assuming planning permission being achieved) Q1 2021. Discharge of the planning conditions will commence Q1 2020 in parallel with the agreement to alter the phasing of the care home first rather than the supported living. Phase 1 would remain unaltered as it is required for both phase 2 or 3</p>			
Delivery Forecast			
2019/20	2020/21	2021/22	2022/23
	79 beds	42 units	
Commentary on Delivery Forecast			
<p>Care home 12 month build, 42 units also a 12 month build</p>			
Developer's Declaration			
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 			
Local Authority: NORWICH CITY COUNCIL		Developer/Agent: Boudica Developments	
Name: ALAN C. HAINSWELL		Name: Marcus Allington	
Job Title: PLANNER		Job Title: Director	

Date: 17/12/19

Date: 27.11.19

Site & Developer/Agent Details				
Developer/Agent	Norwich City Council			
Reference	R36			
Location	Mile Cross depot			
Planning Status	Allocation			
Description of Development	Mixed use development including housing			
Site Progress				
Total Homes Completed at 1 st April 2019	0	Homes Under Construction at 1 st April 2019	0	
Number of Homes Completed by Year				
	2014/15	2015/16	2016/17	2017/18
	0	0	0	0
				2018/19
				0
Commentary on Site Progress				
<p>The site was the former council depot comprising industrial units and open storage. Norwich City Council owns the site and it is anticipated that it will be developed for residential/housing. Demolition of structures on the site was undertaken from January to June 2019 and successful demolition and site clearance has been achieved.</p> <p>A range of studies have been completed including ground investigations, structural surveys, ecology and arboriculture surveys. A number of reports have been completed that aim to unlock this site and allow the council to mobilise the site and obtain a master planning application for a housing-led scheme that will highlight the potential for a small to medium size health and well-being hub to be located on the plan. Detailed planning for the residential element of the site as well as a comprehensive and best practice approach to remediation of the brownfield site is expected to be achieved in 2020.</p>				
Delivery Forecast				
	2019/20	2020/21	2021/22	2022/23
			30	90
				2023/24
				30
Commentary on Delivery Forecast				
Start dates are to be finalised but it is hoped to seek planning approval during 2020 and start development in 2021-22.				
Developer's Declaration				
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered as highlighted in the delivery forecast and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority: Norwich city council			Developer/Agent: Norwich city council	
Name: C. HOUNSELL			Name: Bob Cronk	

Job Title: PLANWER

Date: 17/12/19.

Job Title: Director of people and neighbourhoods

Date: 4 December 2019

Site & Developer/Agent Details					
Developer/Agent	Norwich City Council				
Reference	CC3				
Location	10-14 Ber Street				
Planning Status	Allocation				
Description of Development	Mixed use development				
Site Progress					
Total Homes Completed at 1 st April 2019	0		Homes Under Construction at 1 st April 2019	0	
Number of Homes Completed by Year					
	2014/15	2015/16	2016/17	2017/18	2018/19
	0	0	0	0	0
Commentary on Site Progress					
Allocation CC3 expects a minimum of 10 dwellings to be constructed on the site along with retail use.					
Norwich City Council owns this site and is currently considering options for its development. The site is expected to be delivered within a 5 year period.					
Delivery Forecast					
	2019/20	2020/21	2021/22	2022/23	2023/24
	0	0	0	0	10
Commentary on Delivery Forecast					
A planning application is expected to be submitted by 2021 and delivery of 10 units is anticipated in 2023/24.					
Developer's Declaration					
I confirm that:					
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 					
and,					
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 					
Local Authority: NORWICH CITY COUNCIL			Developer/Agent:		
Name: C. HOLLNSELL			Name: Graham Nelson		
Job Title: PLANNER			Job Title: Director of Regeneration and Development		
Date: 17/12/19.			Date: 11 December 2019		

Site & Developer/Agent Details					
Developer/Agent	Norwich City Council				
Reference	CC11				
Location	Argyle Street				
Planning Status	Allocation				
Description of Development	Residential				
Site Progress					
Total Homes Completed at 1 st April 2019	0	Homes Under Construction at 1 st April 2019	0		
Number of Homes Completed by Year					
	2014/15	2015/16	2016/17	2017/18	2018/19
	0	0	0	0	0
Commentary on Site Progress					
<p>Norwich City Council owns this site. Significant work has been undertaken by the council to investigate feasibility and constraints.</p> <p>19 existing dwellings on this site were granted approval for demolition under application reference 14/01574/NF3. These buildings were subsequently demolished, and the site has been cleared and hoarding erected.</p> <p>Site investigations have shown that the site has difficult ground conditions, requiring future development to be constructed using lightweight superstructures.</p>					
Delivery Forecast					
	2019/20	2020/21	2021/22	2022/23	2023/24
	0	0	9	0	0
Commentary on Delivery Forecast					
<p>Planning application anticipated mid- late 2021 Site commencement anticipated early 2022 Estimated delivery: 9 units, anticipated by end of March 2023</p>					
Developer's Declaration					
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 					
Local Authority: NORWICH CITY COUNCIL		Developer/Agent:			
Name: C. HOUNSELL		Name: Graham Nelson			
Job Title: PLANNER.					

Date: 17/12/19

Job Title: Director of Regeneration and Development

Date: 11 December 2019

Site & Developer/Agent Details					
Developer/Agent	Andy Scales , Norfolk Property Consultants Ltd				
Reference	R2				
Location	Norfolk Learning Difficulties Centre, Ispwich Road				
Planning Status	Allocation				
Description of Development	Housing with care and/or community facilities, or housing development (30 dwellings)				
Site Progress					
Total Homes Completed at 1 st April 2019	0		Homes Under Construction at 1 st April 2019	0	
Number of Homes Completed by Year					
	2014/15	2015/16	2016/17	2017/18	2018/19
	0	0	0	0	0
Commentary on Site Progress					
<p>The site has been in operational use to deliver the NCC Adult Services function. There are on-going discussion to relocate the current Adult Services functions / facilities from this site in the next 2 -3 years that would enable development to take place</p>					
Delivery Forecast					
	2019/20	2020/21	2021/22	2022/23	2023/24
	0	0	0	0	10
Commentary on Delivery Forecast					
<p>Once vacant and surplus, NCC would seek to realise a receipt from this asset at the earlier opportunity and once a clear timetable is identified, an early planning consent would be secured and site purchaser / developer identified. However, this would be unlikely to secure any development on site until 2022 / 23 or later.</p>					
Developer's Declaration					
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 					
Local Authority: <i>NORWICH CITY COUNCIL</i>			Developer/Agent:		
Name: <i>C. HAINSELL</i>			Name: Andy Scales (Agent)		
Job Title: <i>PLANNER</i>			Job Title: Head of Planning Consultancy (NPS)		
Date: <i>17 / 12 / 19.</i>			Date: 20 November 2019		

**Greater Norwich Area Housing Land Supply
Assessment at 1st April 2019**

Joint Delivery Statements

South Norfolk Council

Site & Developer/Agent Details				
Developer/Agent	Clayland Architects (on behalf of Tas Valley Developments Ltd)			
Reference	2006/0171/O Allocation ASL1			
Location	Aslacton: Coopers Scrap Yard			
Planning Status	Outline Permission			
Description of Development	Proposed erection of 15 dwellings			
Site Progress				
Total Homes Completed at 1st April 2019	0			
Homes Under Construction at 1st April 2019	0			
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
.				
Commentary on Site Progress				
2019/0460/D – Reserved Matters application submitted.				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
-	-	-	-	-
.				
Commentary on Delivery Forecast				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 				
and,				
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:	Developer/Agent: Clayland Architects			
Print Name: Daisy Sutcliffe	Print Name: Steven Swaby			
Job Title: Spatial Planning Monitoring Officer	Job Title: Principal Architect			
Date: 25th October 2019	Date:10/12/2019			

Site & Developer/Agent Details

Developer/Agent	Margaret Shelley at Lanpro (on behalf of Mr & Mrs Keable, site owners)
Reference	2017/2131
Location	Bracon Ash: West of Long Lane
Planning Status	Outline Permission plus Reserved matters for 7 plots
Description of Development	15 self/custom-build units

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	3
---	---	--	---

Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Commentary on Site Progress

(Please give any reasons why delivery has exceeded expected rates, or otherwise. Where relevant, please include details on progress towards the submission of a planning application(s), progress with site assessment and details of any known viability, ownership or infrastructure constraints).

Progress is a little faster than anticipated – the plot sales went very well and owners are keen to move ahead quickly.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
4	8	3	-	-

Commentary on Delivery Forecast

(Please include confirmation of delivery intentions, anticipated start dates and build-out rates, with any supporting evidence on lead-in times and build-out rates on comparable sites where possible. Please note any assumptions used).

Progress is a little faster than anticipated – the plot sales went very well and owners are keen to move ahead quickly.

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.
- and,
- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority:	Developer/Agent: LONG FOUR ACRES LTD
Print Name: Daisy Sutcliffe	Print Name: K. KEABLE
Job Title: Spatial Planning Monitoring Officer	Job Title: DIRECTOR
Date: 25 th October 2019	Date: 5 th December 2019

Site & Developer/Agent Details				
Developer/Agent	Kerry Smith c/o Bennett Homes			
Reference	2014/1440			
Location	Costessey: Townhouse Road			
Planning Status	Detailed Permission			
Description of Development	62 dwellings			
Site Progress				
Total Homes Completed at 1st April 2019	48			
Homes Under Construction at 1st April 2019	14			
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	17	31
.				
Commentary on Site Progress				
<i>5 units completed in 2019/2020 and site almost complete (as seen on site visit in October 2019).</i>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
14	-	-	-	-
.				
Commentary on Delivery Forecast				
<i>Site to completed by end of March 2020.</i>				
Developer's Declaration				
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
<p>Local Authority:</p> <p>Print Name: Daisy Sutcliffe</p> <p>Job Title: Spatial Planning Monitoring Officer</p> <p>Date: 25th October 2019</p>	<p>Developer/Agent:</p> <p>Print Name: Kerry Smith</p> <p>Job Title: Development Surveyor</p> <p>Date: 21 November 2019</p>			

Site & Developer/Agent Details				
Developer/Agent	Jordan Last c/o Taylor Wimpey East Anglia			
Reference	2013/0567 & 2016/0402 COS1			
Location	Costessey: West of Lodge Farm			
Planning Status	Full Permission			
Description of Development	509 dwellings			
Site Progress				
Total Homes Completed at 1st April 2019	230	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	25	82	75	48
.				
Commentary on Site Progress				
<i>Site under construction. 34 of 279 remaining plots already completed in 2019/2020. Build rates in line with developers forecast.</i>				
.				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
15	54	60	60	39
.				
Commentary on Delivery Forecast				
<i>Expected to continue at around past development rates until complete.</i>				
.				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 				
and,				
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:		Developer/Agent:		
Print Name: Daisy Sutcliffe		Print Name: Jordan Last		
Job Title: Spatial Planning Monitoring Officer		Job Title: Senior Planner		
Date: 25th October 2019		Date: 21st November 2019		

Site & Developer/Agent Details				
Developer/Agent	John Dale c/o Bovis Homes			
Reference	2008/2347 (part)			
Location	Cringleford: North of the A11, Roundhouse Park (part)			
Planning Status	Full Application submitted			
Description of Development	50 dwellings as part of a Full application for residential development associated infrastructure			
Site Progress				
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
.				
Commentary on Site Progress				
<p>Following applications submitted: 2018/0280/F – Full permission (refused) for construction of 35 dwellings (including 2 affordable dwellings) 2018/0281/F – Full permission (pending decision) for 16 apartments & 2 houses</p>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
-	2	38	10	-
.				
Commentary on Delivery Forecast				
Developer's Declaration				
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:		Developer/Agent:		
Print Name: Daisy Sutcliffe		Print Name: John Dale		
Job Title: Spatial Planning Monitoring Officer		Job Title: Design & Planning Manager		
Date: 25th October 2019		Date: 29th November 2019		

Site & Developer/Agent Details					
Developer/Agent	Spencer Burrell (on behalf of Big Sky Developments)				
Reference	2013/1494/O (part) Cringleford NP HOU1 (part)				
Location	Cringleford: Land South of the A11 & East of the A47				
Planning Status	Outline & some detailed permissions				
Description of Development	350 dwellings & 2,500 sq.m of commercial floorspace within 650 dwelling scheme				
Site Progress					
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0		
Number of Homes Completed by Year					
	2014/15	2015/16	2016/17	2017/18	2018/19
	-	-	-	-	-
.					
Commentary on Site Progress					
<p><i>Following applications approved/pending consideration:</i></p> <p>2018/2303 - Discharge of Condition for Design Code</p> <p>2018/2783 – RM for 67 dwellings</p> <p>2018/2784 – RM for 79 dwellings</p> <p>2018/2785 – RM for 62 dwellings</p> <p>2018/2786 – RM for 56 dwellings</p> <p>2018/2787 – RM for 23 dwellings</p> <p>2018/2788 – RM for 21 dwellings</p> <p>2018/2789 – RM for 42 dwellings & 500 sq.m of commercial floorspace</p> <p>2018/2790 – RM for 765 sq.m of commercial floorspace</p> <p>2018/2791 – RM for strategic landscape</p> <p>Site has central government Accelerated Construction funding and infrastructure construction is underway.</p>					
Delivery Forecast					
.					
	2019/20	2020/21	2021/22	2022/23	2023/24
	-	60	86	62	51
.					
Commentary on Delivery Forecast					
<p><i>Following the planning process, the site will be delivered in phases. The first reserved matters application has been approved. The site access off Roundhouse Roundabout has been constructed. Final 90 units by April 2025.</i></p>					
Developer's Declaration					
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 					
Local Authority:			Developer/Agent:		

Print Name: Daisy Sutcliffe

Job Title: Spatial Planning Monitoring Officer

Date: 25th October 2019


Print Name: Spencer Burrell

Job Title: Development Director

Date: 02/12/19

Site & Developer/Agent Details					
Developer/Agent	Simon Bryan c/o Hopkins & Moore (Developments) Limited				
Reference	2016/0482/F Allocation DIC1				
Location	Dickleburgh: Langmere Road				
Planning Status	Full Permission				
Description of Development	Residential development of land to provide 22 dwellings				
Site Progress					
Total Homes Completed at 1st April 2019	8	Homes Under Construction at 1st April 2019	0		
Number of Homes Completed by Year					
.					
	2014/15	2015/16	2016/17	2017/18	2018/19
	-	-	-	-	8
.					
Commentary on Site Progress					
<i>Under construction.</i>					
Delivery Forecast					
.					
	2019/20	2020/21	2021/22	2022/23	2023/24
	14	-	-	-	-
.					
Commentary on Delivery Forecast					
Developer's Declaration					
I confirm that:					
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 					
Local Authority:	Developer/Agent: DEVELOPER				
Print Name: Daisy Sutcliffe	Print Name: SIMON BRYAN				
Job Title: Spatial Planning Monitoring Officer	Job Title: DEVELOPMENT DIRECTOR				
Date: 25th October 2019	Date: 25/11/19				

Site & Developer/Agent Details				
Developer/Agent	Nicole Wright c/o La Ronde Wright			
Reference	2018/0980/O			
Location	Dickleburgh: Land West of Norwich Rd			
Planning Status	Outline Permission			
Description of Development	22 dwellings			
Site Progress				
Total Homes Completed at 1st April 2019	0			
Homes Under Construction at 1st April 2019	0			
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
.				
Commentary on Site Progress				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
-	-	-	-	-
.				
Commentary on Delivery Forecast				
All dwellings to be delivered by 1 July 2022				
Developer's Declaration				
I confirm that: <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. and, <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:	Developer/Agent:			
Print Name: Daisy Sutcliffe	Print Name: Nicole Wright MRTPI			
Job Title: Spatial Planning Monitoring Officer	Job Title: Director			
Date: 25th October 2019	Date: 19th November 2019			

Site & Developer/Agent Details				
Developer/Agent	Bounty Holdings Ltd c/o Chapman Chartered Surveyors			
Reference	Part of Allocation DIS1			
Location	Diss: Land North of Vinces Road			
Planning Status	Land Allocation			
Description of Development	A residential development of 35 dwellings			
Site Progress				
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
.				
Commentary on Site Progress				
<i>We are having discussions with the neighbouring landowner about bringing this site forward earlier within the current five-year window as part of the overall DIS1 allocation.</i>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
-	-	-	15	20
.				
Commentary on Delivery Forecast				
<i>This will depend on the outcome of our discussions but our client remains committed to delivery by a housing developer as soon as possible.</i>				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:	Developer/Agent: 			
Print Name: Daisy Sutcliffe	Print Name: Oliver Chapman MRICS			
Job Title: Spatial Planning Monitoring Officer	Job Title: Director			
Date: 25th October 2019	Date: 29.11.2019			

Site & Developer/Agent Details

Developer/Agent	Michael Goldney c/o Cripps Developments
Reference	2018/1317 Allocation EAR1
Location	Earsham: Lodge Field, School Lane
Planning Status	Full Permission
Description of Development	16 dwellings

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
---	---	--	---

Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Commentary on Site Progress

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
13	3	-	-	-

Commentary on Delivery Forecast

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.
- and,
- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority:

Print Name: Daisy Sutcliffe

Job Title: Spatial Planning Monitoring Officer

Date: 25th October 2019

Developer/Agent: CRIPPS DEVELOPMENTS LTD

Print Name: MIKE GOLDNEY

Job Title: COMMERCIAL DIRECTOR.

Date: 19th NOVEMBER 2019

Site & Developer/Agent Details			
Developer/Agent	Laura Townes c/o Persimmon Homes		
Reference	2014/2611 Allocation EAS1		
Location	Easton: South and East of village		
Planning Status	Outline Permission		
Description of Development	890 dwellings and village centre, south and east of the village		
Site Progress			
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
Number of Homes Completed by Year			
.			
2014/15	2015/16	2016/17	2017/18
-	-	-	-
.			
Commentary on Site Progress			
<i>Indicated commencement of site planned for 2020.</i>			
<i>Design Code submitted.</i>			
Delivery Forecast			
.			
2019/20	2020/21	2021/22	2022/23
-	15	55	55
.			
Commentary on Delivery Forecast			
<i>Commence on site Q3 2020, first completions Q1 2021.</i>			
Developer's Declaration			
I confirm that:			
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 			
and,			
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 			
Local Authority:	Developer/Agent:		
Print Name: Daisy Sutcliffe	Print Name: Laura Townes		
Job Title: Spatial Planning Monitoring Officer	Job Title: Head of Land & Planning		
Date: 25th October 2019	Date: 4th December 2019		

Site & Developer/Agent Details				
Developer/Agent	Chris Smith c/o Hopkins & Moore Developments Ltd			
Reference	2019/1013/F Allocation GIL1			
Location	Gillingham: Norwich Road			
Planning Status	Full Permission			
Description of Development	Residential development of 22 dwellings, together with associated public open space, access roads, garaging and car parking.			
Site Progress				
Total Homes Completed at 1st April 2019	0			
Homes Under Construction at 1st April 2019	0			
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
.				
Commentary on Site Progress				
<p>Authorisation to Grant Planning permission was given by the LPA Planning Committee of 16th October 2019.</p> <p>The issue of Planning Permission is now awaiting the completion of the necessary S106 Agreement.</p>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
-	- 9	- 13	-	-
.				
Commentary on Delivery Forecast				
<p>The above delivery figures are based upon the issue of a Planning Permission by February 2020.</p>				
Developer's Declaration				
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:	Developer/Agent:			
Print Name: Daisy Sutcliffe	Print Name: Chris Smith			
Job Title: Spatial Planning Monitoring Officer	Job Title: Development Planner			
Date: 25th October 2019	Date: 21st November 2019			

Site & Developer/Agent Details					
Developer/Agent	Edward Gilder c/o Badger Building				
Reference	2011/0026 & 2018/0079				
Location	Hales: Former Workshop, Yarmouth Road				
Planning Status	Full Permission				
Description of Development	10 dwellings under extant 2011 permission, plus 3 additional dwellings under 2018 permission				
Site Progress					
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	10		
Number of Homes Completed by Year					
.					
	2014/15	2015/16	2016/17	2017/18	2018/19
	-	-	-	-	-
.					
Commentary on Site Progress					
Delivery Forecast					
.					
	2019/20	2020/21	2021/22	2022/23	2023/24
	12		-	-	-
.					
Commentary on Delivery Forecast					
The above properties will all be complete by April 2010					
Developer's Declaration					
I confirm that:					
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 					
Local Authority:	Developer/Agent: Badger Building				
Print Name: Daisy Sutcliffe	Print Name: Edward Gilder				
Job Title: Spatial Planning Monitoring Officer	Job Title: Land and Planning Manager				
Date: 25th October 2019	Date: 2 December 2019				

Site & Developer/Agent Details

Developer/Agent	Mark Nolan c/o Chaplin Farrant
Reference	2018/1934/O (PDE) Allocation HAL1
Location	Hales: North of Yarmouth Road
Planning Status	Land Allocation
Description of Development	10 dwellings

Site Progress

Total Homes Completed at 1 st April 2019	0	Homes Under Construction at 1 st April 2019	0
---	---	--	---

Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Commentary on Site Progress

Outline application 2018/1934/O pending decision

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
-	- 20	-	-	-

Commentary on Delivery Forecast

Site to be sold with T.P. approval.
Development will be

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.

and,

- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority:	Developer/Agent: <i>Chaplin Farrant</i>
Print Name: Daisy Sutcliffe	Print Name: <i>M.J. Nolan</i>
Job Title: Spatial Planning Monitoring Officer	Job Title: <i>Director</i>
Date: 25 th October 2019	Date: <i>21 Nov 2019</i>

Site & Developer/Agent Details				
Developer/Agent	Mr & Mrs Gibbons, Wilderness Farmhouse			
Reference	1998/1119			
Location	Harleston: Land at Cranes Meadow			
Planning Status	Full Permission			
Description of Development	Erection of 27 dwellings and associated works			
Site Progress				
Total Homes Completed at 1st April 2019	18	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-		-
.				
Commentary on Site Progress				
<p><i>Initial 18 dwellings completed prior to 2013.</i></p> <p><i>2016/1161/DC – Discharge of conditions approved for plots 50-58 (remaining 9 plots)</i></p>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
4	4	1	-	-
.				
Commentary on Delivery Forecast				
<p><i>Build initially delayed due to expected delivery of approved brick types (between April – July 2019).</i></p> <p>Foundations and oversites completed to 4no dwellings, the remaining 5 number dwellings are now roofed in.</p>				
Developer's Declaration				
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:		Developer/Agent:		
Print Name: Daisy Sutcliffe		Print Name: Stephen Gibbons		
Job Title: Spatial Planning Monitoring Officer		Job Title: Owner		
Date: 25th October 2019		Date: 29th November 2019		

Site & Developer/Agent Details

Developer/Agent	Julian Wells c/o FW Properties
Reference	HEM1
Location	Hempnall: off Bungay Road
Planning Status	Allocated Site
Description of Development	20 dwellings

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
---	---	--	---

Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Commentary on Site Progress

2019/0864/F – Full permission (pending decision) for proposed erection of 23 dwellings with associated landscaping, drainage and highways works.

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
-	-	23	-	-

Commentary on Delivery Forecast

We hope to be starting the construction of these new homes in Spring 2020 with practical completion in Autumn 2021.

Developer's Declaration

- I confirm that:
- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.
- and,
- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority:	Developer/Agent: FW Properties
Print Name: Daisy Sutcliffe	Print Name: JULIAN WELLS
Job Title: Spatial Planning Monitoring Officer	Job Title: DIRECTOR
Date: 25 th October 2019	Date: 19/11/2019

Site & Developer/Agent Details				
Developer/Agent	Laura Townes c/o Persimmon Homes			
Reference	2011/1804 – Outline, 2015/1681 – RM (phase B1-A), 2017/1104 – RM (phase B1-B), 2018/2500 – RM (phase B2) Allocation HET1 (part)			
Location	Hethersett: North Village			
Planning Status	Outline permission for 405 dwellings & Detailed Permission for 791. Phase B1-A = 126 dwellings Phase B1-B = 107 dwellings Phase B2 = 191 dwellings			
Description of Development	1,196 dwellings with primary school and local services			
Site Progress				
Total Homes Completed at 1st April 2019	Phase B1-A = 126 dwellings Phase B1-B = 0 dwellings Phase B2 = 0 dwellings	Homes Under Construction at 1st April 2019	107	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	Phase B1-A = 26	Phase B1-A = 46	Phase B1-A = 54 (phase complete)
.				
Commentary on Site Progress				
<p>Phase B1-A = complete (126 dwellings)</p> <p>Phase B1-B = 18 units of 107 complete (as seen on site visit in October 2019). 6 further units under construction.</p> <p>2018/2500/D - Detailed permission for Phase B2 (191 dwellings) now approved.</p>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
Phase B1-B = 70	Phase B1-B = 37 (phase complete)	-	-	-
-	Phase B2 = 23	Phase B2 = 80	Phase B2 = 80	Phase B2 = 8 (phase complete) Phase B3 = 73
.				
Commentary on Delivery Forecast				
<p>Phase B2 included in delivery forecast as reserved matters has now been approved. Delivery expected from 2020/21 as a continuation from Phase B1-B.</p>				

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.
- and,
- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority:

Print Name: Daisy Sutcliffe

Job Title: Spatial Planning Monitoring Officer

Date: 25th October 2019

Developer/Agent:

Print Name: Laura Townes

Job Title: Head of Land & Planning

Date: 4th December 2019

Site & Developer/Agent Details				
Developer/Agent	Jordan Last c/o Taylor Wimpey			
Reference	2011/1804 – Outline, 2015/1594 – RM (phase A1-A), 2017/0151 – RM (phase A1-B), 2018/2326 – RM (phase A2) Allocation HET1 (part)			
Location	Hethersett: North Village			
Planning Status	Outline permission for 405 dwellings & Detailed Permission for 791. Phase A1-A = 95 dwellings Phase A1-B = 91 dwellings Phase A2 = 181 dwellings			
Description of Development	1,196 dwellings with primary school and local services			
Site Progress				
Total Homes Completed at 1st April 2019	Phase A1-A = 95 dwellings Phase A1-B = 0 dwellings Phase A2 = 0 dwellings	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	Phase A1-A – 7	Phase A1-A – 49	Phase A1-A – 39 Phase A1-B - 3
.				
Commentary on Site Progress				
<p>Phase A1-A = complete (95 dwellings)</p> <p>Phase A1-B = 40 units of remaining 88 complete (as seen on site visit in October 2019). 7 further units under construction.</p> <p>2018/2326/D - Detailed permission for Phase A2 (181 dwellings) approved.</p>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
Phase A1-B – 49	Phase A1-B – 39 Phase A2 - 17	Phase A2 - 57	Phase A2 - 55	Phase A2 - 49
.				
Commentary on Delivery Forecast				
Developer's Declaration				
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				

Local Authority:

Print Name: Daisy Sutcliffe

Job Title: Spatial Planning Monitoring Officer

Date: 25th October 2019

Developer/Agent:

Print Name: Jordan Last

Job Title: Senior Planner

Date: 21st November 2019

Site & Developer/Agent Details				
Developer/Agent	James Nicholls c/o Norfolk Homes Ltd			
Reference	Allocation LNGS1 (part)			
Location	Long Stratton: North west of the village			
Planning Status	Allocated site with hybrid application under consideration			
Description of Development	600 dwellings, link road and employment land			
Site Progress				
Total Homes Completed at 1st April 2019	0			
Homes Under Construction at 1st April 2019	0			
Number of Homes Completed by Year				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
Commentary on Site Progress				
2018/0112/O – Outline permission (pending consideration)				
Recent DfT announcement of Major Roads Network funding to complete the bypass business case linked to this application.				
Delivery Forecast				
2019/20	2020/21	2021/22	2022/23	2023/24
-	-	15	20	20
Commentary on Delivery Forecast				
Completions based on documentation supporting the current hybrid planning application.				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 				
and,				
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:		Developer/Agent:		
Print Name: Daisy Sutcliffe		Norfolk Homes Ltd		
Job Title: Spatial Planning Monitoring Officer		Print Name:		
Date: 25th October 2019		James Nicholls		
		Job Title:		
		Development Manager		
		Date: 19.11.19		

Site & Developer/Agent Details				
Developer/Agent	Chris Webber c/o Barratt/David Wilson Homes			
Reference	Phase 1 - 2014/0732 & Phase 2 - 2016/2388 Allocation POR1			
Location	Poringland: Heath Farm			
Planning Status	Detailed Permission			
Description of Development	270 dwellings (150 under Phase 1 - 2014/0732 & 120 under Phase 2 - 2016/2388)			
Site Progress				
Total Homes Completed at 1st April 2019	Phase 1 = 150 (complete) Phase 2 = 68	Homes Under Construction at 1st April 2019	52	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	Phase 1 - 3	Phase 1 - 76	Phase 1 - 63 Phase 2 - 17	Phase 1 - 8 Phase 2 - 51
.				
Commentary on Site Progress				
Phase 1 complete. Phase 2 under construction.				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
Phase 2 - 36	Phase 2 - 16	-	-	-
.				
Commentary on Delivery Forecast				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. and,				
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:	Developer/Agent: David Wilson Homes			
Print Name: Daisy Sutcliffe	Print Name: Chris Webber			
Job Title: Spatial Planning Monitoring Officer	Job Title: Assistant Planner			
Date: 25th October 2019	Date: 28 November 2019			

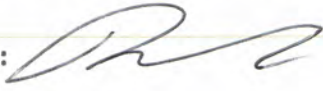
Site & Developer/Agent Details				
Developer/Agent	Kerry Smith c/o Bennett Homes			
Reference	2015/2326/D			
Location	Bixley: West of Octagon Barn, Bungay Road			
Planning Status	Detailed Permission			
Description of Development	60 dwellings and 2 commercial units			
Site Progress				
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	39	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
.				
Commentary on Site Progress				
2 of 60 plots completed in September 2019.				
15 plots commenced between May – September 2019.				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
19	32	9	-	-
.				
Commentary on Delivery Forecast				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:	Developer/Agent:			
Print Name: Daisy Sutcliffe	Print Name: Kerry Smith			
Job Title: Spatial Planning Monitoring Officer	Job Title: Development Surveyor			
Date: 25th October 2019	Date: 21 November 2019			

Site & Developer/Agent Details				
Developer/Agent	James Nicholls c/o Norfolk Homes Ltd			
Reference	2014/0319 Allocation POR6 (part)			
Location	Poringland, West of The Street/ North of Shotesham Road			
Planning Status	Detailed Permission			
Description of Development	221 dwellings			
Site Progress				
Total Homes Completed at 1st April 2019	76	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	13	27	36	0
.				
Commentary on Site Progress				
<i>Badger Building element of the site complete (76 dwellings). Remainder of site (Norfolk Homes) due to commence 2019/20.</i>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
-	25	25	25	25
.				
Commentary on Delivery Forecast				
.				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 				
and,				
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:		Developer/Agent:		
Print Name: Daisy Sutcliffe		Norfolk Homes Ltd		
Job Title: Spatial Planning Monitoring Officer		Print Name:		
Date: 25th October 2019		James Nicholls		
		Job Title:		
		Development Manager		
		Date: 19.11.19		

Site & Developer/Agent Details				
Developer/Agent	James Nicholls c/o Norfolk Homes Ltd			
Reference	2010/1332 Allocation POR4 (part)			
Location	Poringland, West of The Street/South of Stoke Road			
Planning Status	Detailed Permission			
Description of Development	232 dwellings			
Site Progress				
Total Homes Completed at 1st April 2019	187	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
42	9	41	26	13
.				
Commentary on Site Progress				
56 completed prior to 1 April 2014				
.				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
30	19	-	-	-
.				
Commentary on Delivery Forecast				
.				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 				
and,				
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:	Developer/Agent: Norfolk Homes Ltd			
Print Name: Daisy Sutcliffe	Print Name: James Nicholls			
Job Title: Spatial Planning Monitoring Officer	Job Title: Development Manager			
Date: 25th October 2019	Date: 25/11/2019			

Site & Developer/Agent Details				
Developer/Agent	Neil Binks c/o Orchard Developments			
Reference	2015/2491 & 2018/0598 Allocation PUL1			
Location	Pulham Market: Sycamore Farm			
Planning Status	Full Permission			
Description of Development	Erection of 10 new dwellings and garages			
Site Progress				
Total Homes Completed at 1 st April 2019	0			
Homes Under Construction at 1 st April 2019	0			
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
.				
Commentary on Site Progress				
Site under construction.				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
10 S	- S	-	-	-
.				
Commentary on Delivery Forecast				
.				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 				
and,				
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:	Developer/Agent: ORCHARD HOMES			
Print Name: Daisy Sutcliffe	Print Name: C.T. BINKS			
Job Title: Spatial Planning Monitoring Officer	Job Title: DIRECTOR			
Date: 25 th October 2019	Date: 19/11/19			

Site & Developer/Agent Details				
Developer/Agent	Julian Wells c/o FW Properties			
Reference	2017/1649 Allocation ROC1			
Location	Rockland St Mary: off Bee Orchid Way			
Planning Status	Full Permission			
Description of Development	Construction of 21 residential dwellings			
Site Progress				
Total Homes Completed at 1 st April 2019	0			
Homes Under Construction at 1 st April 2019	0			
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
.				
Commentary on Site Progress				
<i>Under construction</i>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
11 (21)	10	-	-	-
.				
Commentary on Delivery Forecast				
<i>Development will be completed in February 2020.</i>				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 				
and,				
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:	Developer/Agent:	<i>FW PROPERTIES.</i>		
Print Name: Daisy Sutcliffe	Print Name:	<i>JULIAN WELLS</i>		
Job Title: Spatial Planning Monitoring Officer	Job Title:	<i>DIRECTOR</i>		
Date: 25 th October 2019	Date:	<i>21/11/2019.</i>		

Site & Developer/Agent Details					
Developer/Agent	Rachel Rackham c/o Rackhams Builders				
Reference	Allocation DIS3				
Location	Roydon: Land off Denmark Lane				
Planning Status	Allocated Site				
Description of Development	42 dwellings				
Site Progress					
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0		
Number of Homes Completed by Year					
	2014/15	2015/16	2016/17	2017/18	2018/19
	-	-	-	-	-
Commentary on Site Progress					
<i>Commissioning various consultants for specific reports.</i>					
Delivery Forecast					
	2019/20	2020/21	2021/22	2022/23	2023/24
	-	21	21	-	-
Commentary on Delivery Forecast					
<i>Expected to apply for full planning permission in 2019 and to commence works on site thereafter.</i>					
Developer's Declaration					
I confirm that:					
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 					
and,					
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 					
Local Authority:	Developer/Agent:				
Print Name: Daisy Sutcliffe	Print Name:		R S RACKHAM		
Job Title: Spatial Planning Monitoring Officer	Job Title:		DIRECTOR		
Date: 25th October 2019	Date:		19/11/19.		

Site & Developer/Agent Details				
Developer/Agent	Max Wiseman c/o Broadleaf Developments			
Reference	2016/0165/O & 2019/0956/D			
Location	Scole: West of Norwich Road			
Planning Status	Detailed Permission			
Description of Development	18 dwellings, access road and open space wildlife area.			
Site Progress				
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
.				
Commentary on Site Progress				
<i>Reserved matters application recently approved.</i>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
-	-18	-	-	
.				
Commentary on Delivery Forecast				
<p>We anticipate to start construction immediately after completion of the acquisition of the site. The build period is circa 14 months and sales is circa 10 months, thus 24 month project. Broadleaf is a new, SME developer, focusing on resi sites with planning of between 10 – 30 houses. The director Max Wiseman is Chartered Surveyor and business partner has developed sites over the past 10 years.</p>				
Developer's Declaration				
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:		Developer/Agent: Broadleaf Homes		
Print Name: Daisy Sutcliffe		Print Name: Max Wiseman MRICS		
Job Title: Spatial Planning Monitoring Officer		Job Title: Director		
Date: 25th October 2019		Date: 29th Nov 2019		

Site & Developer/Agent Details				
Developer/Agent	Simon Bryan c/o Hopkins Homes			
Reference	2016/2153 Allocation STO1 (part)			
Location	Stoke Holy Cross: South of Long Lane			
Planning Status	Detailed permission			
Description of Development	Proposed erection of 53 dwellings			
Site Progress				
Total Homes Completed at 1st April 2019	43	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	9	34
.				
Commentary on Site Progress				
<i>Site under construction.</i>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
10	-	-	-	-
.				
Commentary on Delivery Forecast				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:	Developer/Agent: DEVELOPER			
Print Name: Daisy Sutcliffe	Print Name: SIMON BRYAN			
Job Title: Spatial Planning Monitoring Officer	Job Title: DEVELOPMENT DIRECTOR			
Date: 25th October 2019	Date: 25/11/19			

Site & Developer/Agent Details				
Developer/Agent	Kerry Smith c/o Bennett Homes			
Reference	2014/1642 & 2017/2247			
Location	Swardeston: land off Bobbins Way			
Planning Status	Detailed Permission			
Description of Development	38 dwellings			
Site Progress				
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
	2014/15	2015/16	2016/17	2017/18
	-	-	-	-
.				
Commentary on Site Progress				
<i>2017/2247/D - Reserved matters application approved for 38 dwellings</i>				
Delivery Forecast				
.				
	2019/20	2020/21	2021/22	2022/23
	0	6	24	8
				-
.				
Commentary on Delivery Forecast				
Due to commence on site March/April 2020				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 				
and,				
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:		Developer/Agent:		
Print Name: Daisy Sutcliffe		Print Name: Kerry Smith		
Job Title: Spatial Planning Monitoring Officer		Job Title: Development Surveyor		
Date: 25th October 2019		Date: 21 November 2019		

Site & Developer/Agent Details			
Developer/Agent	Nick Dawes c/o Brown & Co.		
Reference	SWA1		
Location	Swardeston: Main Road		
Planning Status	Allocated Site		
Description of Development	Allocated for approx. 30 dwellings		
Site Progress			
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
Number of Homes Completed by Year			
.			
2014/15	2015/16	2016/17	2017/18
-	-	-	-
.			
Commentary on Site Progress			
<p>No applications submitted to date. This site is currently available for sale. It is hoped that a preferred developer will be agreed in the early part of 2020 followed by a full planning application by the summer 2020 and the commencement development by the end of 2020 bleak the beginning of 2021</p>			
Delivery Forecast			
.			
2019/20	2020/21	2021/22	2022/23
-	-	15	15
.			
Commentary on Delivery Forecast			
<p>Swardeston popular location for development. With evidence from this rates of house sales from phase 1 Whitehouse farm Sprowston that subject to build rates sales rates could be between 30 to 35 dwellings per annum</p>			
Developer's Declaration			
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 			
<p>Local Authority:</p> <p>Print Name: Daisy Sutcliffe</p> <p>Job Title: Spatial Planning Monitoring Officer</p> <p>Date: 25th October 2019</p>		<p>Agent: Nick Dawes for a number half of the land owners</p> <p>Print Name: NICK DAWES</p> <p>Job Title: Partner</p> <p>Date:28/11/2019</p>	



Site & Developer/Agent Details

Developer/Agent	William Easton c/o F.H. Easton Ltd
Reference	2017/0225 Allocation TAC1
Location	Tacolneston: Land adj The Fields
Planning Status	Outline Permission
Description of Development	21 dwellings

Site Progress

Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
---	---	--	---

Number of Homes Completed by Year

2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-

Delivery Forecast

2019/20	2020/21	2021/22	2022/23	2023/24
10	11	-	-	-

Commentary on Delivery Forecast

Land is now being marketed for sale.

Developer's Declaration

I confirm that:

- the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast.
- and,
- that to the best of my knowledge the information included within this Site Assessment form is accurate.

Local Authority:

Developer/Agent: *F.H. Easton Ltd*

Print Name: Daisy Sutcliffe

Print Name: *William Easton*

Job Title: Spatial Planning Monitoring Officer

Job Title: *Director*

Date: 25th October 2019

Date: *26/12/19*

Site & Developer/Agent Details					
Developer/Agent	Andrew Lansdell c/o Aldridge Lansdell				
Reference	TAS1				
Location	Tasburgh: Church Road				
Planning Status	Allocated site				
Description of Development	Allocated for approx. 20 sites				
Site Progress					
Total Homes Completed at 1 st April 2019	0	Homes Under Construction at 1 st April 2019	0		
Number of Homes Completed by Year					
.					
	2014/15	2015/16	2016/17	2017/18	2018/19
	0	0	0	0	0
.					
Commentary on Site Progress					
<p><i>The site remains on the market for sale as an allocated site within the Local Plan. There has been good interest over the period the site has been available and a sale had been agreed to Bennett Homes, on a conditional contract, subject to planning, but fell through twelve months ago, due to the requirements of the Open Space SPD adopted in September 2018. Currently, one developer is working up a possible scheme in conjunction with a Housing Association, with a view to submitting a formal offer which it is hoped will be forthcoming early in 2020.</i></p>					
Delivery Forecast					
.					
	2019/20	2020/21	2021/22	2022/23	2023/24
	0	0	12	12 - 15	-
.					
Commentary on Delivery Forecast					
<p>Once a sale has been agreed on the site, the legal process to exchange of conditional contracts is likely to take 3 – 6 months. A planning application will then be submitted by the developer purchaser within 3 months. Assuming it takes 6 months to gain an approval, it is likely to be mid 2021 before construction commences on site.</p>					
Developer's Declaration					
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 					
Local Authority: South Norfolk Council		Agent: Aldridge Lansdell			
Print Name: Daisy Sutcliffe		Print Name: Andrew Lansdell			

Job Title: Spatial Planning Monitoring Officer

Date: 25th October 2019

Job Title: Principal

Date: 29th November 2019

Site & Developer/Agent Details			
Developer/Agent	Daniel Cripps c/o Cripps Developments		
Reference	2017/2302 Allocation THL1		
Location	Thurlton: Beccles Road, College Rd		
Planning Status	Full Permission		
Description of Development	30 dwellings		
Site Progress			
Total Homes Completed at 1 st April 2019	5	Homes Under Construction at 1 st April 2019	0
Number of Homes Completed by Year			
.			
2014/15	2015/16	2016/17	2017/18
-	-	-	-
			2018/19
			5
.			
Commentary on Site Progress			
Under construction.			
Delivery Forecast			
.			
2019/20	2020/21	2021/22	2022/23
25	-	-	-
.			
Commentary on Delivery Forecast			
Developer's Declaration			
I confirm that:			
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 			
and,			
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 			
Local Authority:	Developer/Agent: Cripps Developments LB		
Print Name: Daisy Sutcliffe	Print Name: Paul Lach		
Job Title: Spatial Planning Monitoring Officer	Job Title: Finance Director		
Date: 25 th October 2019	Date: 29/10/19		

Site & Developer/Agent Details				
Developer/Agent	Nicky Parsons c/o Pegasus Group & James Nicholls c/o Norfolk Homes			
Reference	2014/0981 Allocation TROW1 (part)			
Location	Trowse: Devon Way/Hudson Avenue			
Planning Status	Outline permission, reserved matters pending consideration			
Description of Development	75 dwellings and part of primary school site			
Site Progress				
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
.				
Commentary on Site Progress				
<p>Following applications submitted: 2017/2670/D – RM (pending consideration) Outline planning permission for residential development, associated external works and amenity areas (with an area of land set aside for future primary school use). <i>Detailed application submitted 21st November 2019 – Erection of 83 no. dwellings, vehicular access, landscaping, open space and associated infrastructure Phase 2 Land Off White Horse Lane Trowse Norfolk</i></p>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
-	-	-	15	30
.				
Commentary on Delivery Forecast				
.				
Developer's Declaration				
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:		Developer/Agent: Norfolk Homes Ltd		
Print Name: Daisy Sutcliffe		Print Name: Jack Pointer		
Job Title: Spatial Planning Monitoring Officer		Job Title: Land and Planning		
Date: 25th October 2019		Date: 12/12/2019		
.				

Site & Developer/Agent Details			
Developer/Agent	James Nicholls c/o Norfolk Homes Ltd		
Reference	2016/0803 & 2016/0805 Allocation TROW1 (part)		
Location	Trowse: White Horse Lane		
Planning Status	Detailed Permission		
Description of Development	98 dwellings and new primary school site (part)		
Site Progress			
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
Number of Homes Completed by Year			
.			
2014/15	2015/16	2016/17	2017/18
-	-	-	-
.			
Commentary on Site Progress			
<i>2 plots commenced in August 2019.</i>			
Delivery Forecast			
.			
2019/20	2020/21	2021/22	2022/23
28	25	25	20
.			
Commentary on Delivery Forecast			
<i>Delay originally due to gas main diversion but site now under construction.</i>			
Developer's Declaration			
I confirm that:			
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 			
and,			
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 			
Local Authority:	Developer/Agent: Norfolk Homes		
Print Name: Daisy Sutcliffe	Print Name: Jack Pointer		
Job Title: Spatial Planning Monitoring Officer	Job Title: Land and Planning Coordinator		
Date: 25th October 2019	Date: 04/12/19		

Site & Developer/Agent Details					
Developer/Agent	Julian Wells c/o FW Properties				
Reference	W001				
Location	Woodton: Rear of Georges House				
Planning Status	Outline Permission				
Description of Development	23 dwellings				
Site Progress					
Total Homes Completed at 1 st April 2019	0	Homes Under Construction at 1 st April 2019	0		
Number of Homes Completed by Year					
	2014/15	2015/16	2016/17	2017/18	2018/19
	-	-	-	-	-
Commentary on Site Progress					
Previous outline permission (2016/0466/O) lapsed in August 2019.					
Delivery Forecast					
	2019/20	2020/21	2021/22	2022/23	2023/24
	-	-	- 22	-	-
Commentary on Delivery Forecast					
We are aiming to submit the detailed planning application for the scheme during the first quarter 2020. The construction work could then commence in the last quarter 2020 with practical completion during the second quarter 2022.					
Developer's Declaration					
I confirm that:					
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. and, <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 					
Local Authority:	Developer/Agent: FW Properties				
Print Name: Daisy Sutcliffe	Print Name: JULIAN WELLS				
Job Title: Spatial Planning Monitoring Officer	Job Title: DIRECTOR				
Date: 25 th October 2019	Date: 19/11/2019				

Site & Developer/Agent Details				
Developer/Agent	Laura Townes c/o Persimmon Homes			
Reference	Phase 1 – 2014/1969 & Phase 2 - 2015/1405			
Location	Wymondham: Carpenters Barn			
Planning Status	Detailed permission			
Description of Development	Phase 1 = 217 dwellings Phase 2 - 133 dwellings			
Site Progress				
Total Homes Completed at 1st April 2019	Phase 1 = 217 dwellings (all complete) Phase 2 = 9	Homes Under Construction at 1st April 2019	124	
Number of Homes Completed by Year				
.				
	2014/15	2015/16	2016/17	2017/18
	-	-	Phase 1 = 86	Phase 1 = 82
				Phase 1 = 49 Phase 2 = 9
.				
Commentary on Site Progress				
<p>Phase 1 complete. Phase 2 under construction. 22 units of remaining 124 completed (phase 2), as seen on site visit in October 2019.</p>				
Delivery Forecast				
.				
	2019/20	2020/21	2021/22	2022/23
	75	49	-	-
.				
Commentary on Delivery Forecast				
Developer's Declaration				
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:			Developer/Agent:	
Print Name: Daisy Sutcliffe			Print Name: Laura Townes	
Job Title: Spatial Planning Monitoring Officer			Job Title: Head of Land & Planning	
Date: 25 th October 2019			Date: 4 th December 2019	

Site & Developer/Agent Details				
Developer/Agent	Geoff Armstrong c/o Armstrong Rigg Planning			
Reference	2016/2668 Allocation WYM2			
Location	Wymondham: Former Sale Ground, Cemetery Lane			
Planning Status	Outline Permission			
Description of Development	Allocated for 64 dwellings and commercial use, outline permission does not specify numbers, but supporting evidence is based on 61 dwellings only			
Site Progress				
Total Homes Completed at 1st April 2019	0			
Homes Under Construction at 1st April 2019	0			
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
.				
Commentary on Site Progress				
<p><i>Allocated brownfield site, with a history of previous permissions. Reserved Matters application expect to be submitted sometime in 2019.</i></p>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
-	20	21	20	3
.				
Commentary on Delivery Forecast				
<p><i>Allowing time to secure Reserved Matters consent, delivery is expected to commence on the site in 2020/21 with a delivery rate of approximately 20 dpa expected.</i></p>				
Developer's Declaration				
<p>I confirm that:</p> <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:	Developer/Agent: Armstrong Rigg Planning			
Print Name: Daisy Sutcliffe	Print Name: Geoff Armstrong			
Job Title: Spatial Planning Monitoring Officer	Job Title: Director			
Date: 25th October 2019	Date: 2nd December 2019			

Site & Developer/Agent Details				
Developer/Agent	Spencer Burrell c/o Big Sky Developments			
Reference	Allocation WYM1			
Location	Wymondham: Friarscroft Lane			
Planning Status	Allocated site			
Description of Development	14 dwellings			
Site Progress				
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
.				
Commentary on Site Progress				
<i>Currently developing a layout following pre application advice and further site investigations on ground conditions and flood zone modelling, impact on viability and space have been a huge issue with the pace of this project.</i>				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
-	-	14	-	-
.				
Commentary on Delivery Forecast				
<i>If the further investigations come back favourable in February, works have the potential (subject to planning process) to commence late 2020.</i>				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. <p>and,</p> <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:		Developer/Agent:		
Print Name: Daisy Sutcliffe		Print Name: Spencer Burrell		
Job Title: Spatial Planning Monitoring Officer		Job Title: Development Director		
Date: 25th October 2019		Date: 02/12/19		

Site & Developer/Agent Details				
Developer/Agent	Sam Sinclair c/o Lovell Construction			
Reference	2014/2495/O, 2018/2758/D & 2019/1804/D (PCO)			
Location	Wymondham: London Road/Suton Lane			
Planning Status	Outline Permission & some detailed permission			
Description of Development	335 dwellings, neighbourhood centre and cemetery			
Site Progress				
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	-	-	-
.				
Commentary on Site Progress				
2018/2758/D – Reserved matters approval for 89 dwellings				
2019/1804/D – Reserved matters (pending consideration) for 246 dwellings				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
-	50	50	50	50
.				
Commentary on Delivery Forecast				
Works started on site - 2018/2758/D				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. and,				
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:	Developer/Agent:			
Print Name: Daisy Sutcliffe	Print Name: Sam Sinclair			
Job Title: Spatial Planning Monitoring Officer	Job Title: Regional Technical Manager			
Date: 25th October 2019	Date: 02/12/2019			

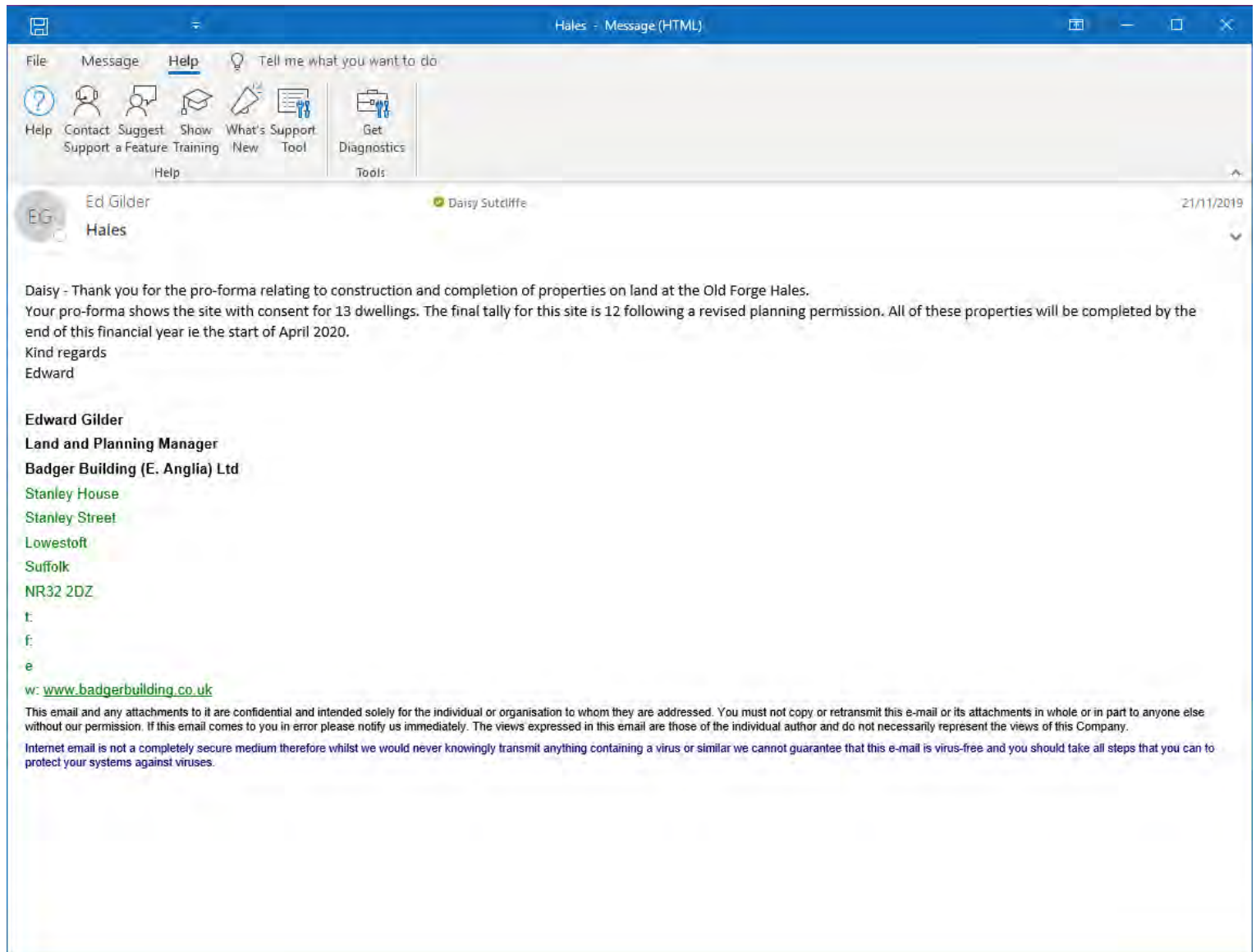
Site & Developer/Agent Details					
Developer/Agent	Simon Bryan c/o Hopkins Homes				
Reference	2015/2168 WYM3 (part)				
Location	Wymondham: South, Rightup Lane				
Planning Status	Detailed permission				
Description of Development	153 dwellings				
Site Progress					
Total Homes Completed at 1st April 2019	50 dwellings	Homes Under Construction at 1st April 2019	0		
Number of Homes Completed by Year					
.					
	2014/15	2015/16	2016/17	2017/18	2018/19
	-	-	-	4	46
.					
Commentary on Site Progress					
<i>Site under construction.</i>					
<i>19 units out of remaining 103 complete, as seen on site visit in October 2019.</i>					
Delivery Forecast					
.					
	2019/20	2020/21	2021/22	2022/23	2023/24
	54	36	13	-	-
.					
Commentary on Delivery Forecast					
Developer's Declaration					
I confirm that:					
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 					
and,					
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 					
Local Authority:			Developer/Agent: DEVELOPER		
Print Name: Daisy Sutcliffe			Print Name: SIMON BRYAN		
Job Title: Spatial Planning Monitoring Officer			Job Title: DEVELOPMENT DIRECTOR		
Date: 25th October 2019			Date: 25/11/19		

Site & Developer/Agent Details				
Developer/Agent	Jordan Last c/o Taylor Wimpey			
Reference	Phase 1 - 2015/1649, Phase 2 - 2016/2586 WYM3 (part)			
Location	Wymondham: South, Silfield Road			
Planning Status	Detailed permission			
Description of Development	Phase 1 - 129 dwellings Phase 2 - 121 dwellings			
Site Progress				
Total Homes Completed at 1st April 2019	Phase 1 = 98 dwellings	Homes Under Construction at 1st April 2019	0	
Number of Homes Completed by Year				
.				
2014/15	2015/16	2016/17	2017/18	2018/19
-	-	Phase 1 - 8	Phase 1 – 32	Phase 1 – 58
.				
Commentary on Site Progress				
Phase 1 under construction – 12 units of remaining 31 completed, as seen on site visit in October 2019. Phase 2 not yet started.				
Delivery Forecast				
.				
2019/20	2020/21	2021/22	2022/23	2023/24
Phase 1 – 31 (complete) Phase 2 - 19	Phase 2 - 48	Phase 2 - 47	7	-
.				
Commentary on Delivery Forecast				
Developer's Declaration				
I confirm that: <ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. and, <ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:		Developer/Agent:		
Print Name: Daisy Sutcliffe		Print Name: Jordan Last		
Job Title: Spatial Planning Monitoring Officer		Job Title: Senior Planner		
Date: 25th October 2019		Date: 21st November 2019		

Site & Developer/Agent Details				
Developer/Agent	Laura Townes c/o Persimmon Homes			
Reference	2014/2042			
Location	Wymondham: Spinks Lane/Norwich Road			
Planning Status	Detailed permission			
Description of Development	259 dwellings			
Site Progress				
Total Homes Completed at 1st April 2019	167	Homes Under Construction at 1st April 2019	92	
Number of Homes Completed by Year				
.				
	2014/15	2015/16	2016/17	2017/18
	-	-	53	39
				2018/19
				75
.				
Commentary on Site Progress				
<i>37 units out of remaining 85, seen as complete on site visit in October 2019.</i>				
Delivery Forecast				
.				
	2019/20	2020/21	2021/22	2022/23
	92	-	-	-
				2023/24
				-
.				
Commentary on Delivery Forecast				
Developer's Declaration				
I confirm that:				
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 				
and,				
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 				
Local Authority:		Developer/Agent:		
Print Name: Daisy Sutcliffe		Print Name: Laura Townes		
Job Title: Spatial Planning Monitoring Officer		Job Title: Head of Land & Planning		
Date: 25th October 2019		Date: 4th December 2019		

Site & Developer/Agent Details			
Developer/Agent	Laura Townes c/o Persimmon Homes		
Reference	2019/0536		
Location	Wymondham: Elm Farm, Norwich Common		
Planning Status	Detailed Permission		
Description of Development	300 dwellings at Norwich Common		
Site Progress			
Total Homes Completed at 1st April 2019	0	Homes Under Construction at 1st April 2019	0
Number of Homes Completed by Year			
.			
2014/15	2015/16	2016/17	2017/18
-	-	-	-
.			
Commentary on Site Progress			
Commencement of development early 2020. Delayed commencement from 2018 estimate due to longer than anticipated reserved matters determination period.			
Delivery Forecast			
.			
2019/20	2020/21	2021/22	2022/23
	35	80	80
.			
Commentary on Delivery Forecast			
Developer's Declaration			
I confirm that:			
<ul style="list-style-type: none"> the site is available, viable and can be delivered at the point envisaged and at the build out rate shown in the delivery forecast. 			
and,			
<ul style="list-style-type: none"> that to the best of my knowledge the information included within this Site Assessment form is accurate. 			
Local Authority:	Developer/Agent:		
Print Name: Daisy Sutcliffe	Print Name: Laura Townes		
Job Title: Spatial Planning Monitoring Officer	Job Title: Head of Land & Planning		
Date: 25th October 2019	Date: 4th December 2019		

Hales: Former Workshop, Yarmouth Road
Reference: 2011/0026 & 2018/0079



Tharston: Chequers Road
Reference: 2014/0843

The screenshot shows an Outlook window titled "RE: SYLS Statements of Common Ground - Message (HTML)". The ribbon includes "File", "Message", and "Help". The "Message" ribbon has groups for "Delete" (Ignore, Delete, Archive, Junk), "Respond" (Reply, Reply All, Forward, Meeting, IM, More), "Move" (Move, OneNote, Actions), "Tags" (Mark Unread, Categorize, Follow Up), "Editing" (Translate, Related, Select), "Speech" (Read Aloud), and "Zoom" (Zoom). The email header shows the sender as "Jordan Last - TW East Anglia" and the recipient as "Daisy Sutcliffe" on "21/11/2019". The subject is "RE: SYLS Statements of Common Ground". A blue notification bar states "You replied to this message on 21/11/2019 11:13." The email body contains the following text: "Hi Daisy,", "This site is now complete", "Kind Regards,", "Jordan", "Jordan Last", "Senior Planning Co-ordinator", "Taylor Wimpey East Anglia", "T:", "Think before you print!". At the bottom, there are four logos: Taylor Wimpey, HBF 2019 (5 Star Home Builder Customer Satisfaction), Glassdoor 2019 Best Places to Work, and Housing Design Awards Shortlist 2019.

APPENDIX D1 – WINDFALL ASSESSMENT SUMMARY

SOUTH NORFOLK – Sites of 9 or fewer												
Type	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	Total	Annual Average
Garden plots	19	15	32	32	25	8	61	50	45	35	322	32
Barn conversions & other agricultural buildings	25	46	37	44	38	15	42	19	30	13	309	31
Conversions shops, offices, schools (including PD)	24	24	15	13	20	4	22	38	14	1	175	18
Other brownfield re-development	41	20	28	13	43	23	1	14	12	8	203	20
Affordable housing exceptions	21	36	33	26	13	21	13	2	0	0	165	17
Other greenfield sites (school playing fields, Para 55 dwellings etc.)	6	13	17	9	0	5	5	15	4	0	74	7
Cert. of lawfulness, removal of occupancy restrictions, sub-division of dwellings etc. (<i>pre-14/15 included as other brownfield re-development</i>)							22	11	15	10	58	15
TOTAL	136	154	162	137	139	76	166	149	120	67	1306	131
TOTAL excluding garden plots	117	139	130	105	114	68	105	99	75	32	984	98

BROADLAND – Sites of 9 or fewer

Type	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	Total	Annual Average
Garden Plots	41	29	23	23	22	35	51	39	15		278	31
Barn conversions & other agricultural buildings	21	6	14	14	18	15	33	17	4		142	16
Conversions shops, offices, schools (including PD)	29	1	4	17	4	12	9	16	8		100	11
Brownfield Redevelopment	17	4	13	2	8	3	19	34	4		104	12
Affordable Housing exceptions	0	8	12	11	0	24	27	3	0		85	9
Other greenfield sites (school playing fields, Para 55 dwellings etc.)	2	2	4	9	12	7	12	8	4		60	7
Cert. of lawfulness, removal of occupy restrictions, sub-division of dwellings etc.	2	5	4	13	2	7	3	20	2		58	6
TOTAL	112	55	74	89	66	103	154	137	37		827	92
TOTAL excluding garden plots	71	26	51	66	44	68	103	98	22		549	61

NORWICH – Major and Minor Sites

	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	Total	Annual Average
Garden plots	10	1	5	5	5	8	11	6	14	16	81	8
Barn conversions & other agricultural buildings	0	0	0	0	0	0	0	0	0	0	0	0
Conversions shops, offices, schools (including PD)	121	52	12	25	46	23	40	34	210	88	651	65
Brownfield Redevelopment	121	96	81	185	162	76	45	71	117	83	1,037	104
Affordable Housing exceptions	0	0	0	0	0	0	0	0	0	0	0	0
Other greenfield sites (school playing fields, Para 55 dwellings etc.)	2	3	0	0	0	1	7	1	40	33	87	9
Cert. of lawfulness, removal of occupancy restrictions, sub-division of dwellings etc.	11	0	12	10	9	3	3	3	16	10	77	8
TOTAL	265	152	110	225	222	111	106	115	397	230	1,933	193
TOTAL excluding garden plots	255	151	105	220	217	103	95	109	383	214	1,852	185

APPENDIX D2 – LAPSE RATE STUDY SUMMARY

Sites of 9 or fewer	Completed within 5 years	Started but not completed within 5 years	Lapsed or renewed/replaced	Notes
Broadland	77.0%	1.5%	21.5%	Sample: 478 units permitted 1 April 2011 to 31 March 2015
Norwich	73.3%	4.9%	21.7%	Sample: 469 units permitted 1 April 2007 to 31 March 2012
South Norfolk	73.6%	10.7%	15.7%	Sample: 610 units permitted 1 April 2012 to 31 March 2016

The above analysis indicates that on average sites of 9 or fewer are not completed within 5 years in 23% of cases in Broadland, 26.6% in Norwich and 26.4% in South Norfolk.

To account for this the delivery forecast of sites of 9 or fewer has been discounted by 27%, which represents the highest end of the range.

Appendix B – CIL receipts

Greater Norwich Infrastructure Investment Fund Reporting Year 2018-19

1. Under the Greater Norwich City Deal, signed in December 2013, Broadland District Council, Norwich City Council and South Norfolk Council (hereafter referred to as ‘the Councils’) committed to pooling the majority of their Community Infrastructure Levy (CIL) income to create a Greater Norwich Infrastructure Investment Fund.
2. In accordance with the CIL legislation, the Councils may deduct up to a maximum of 5% of the CIL to cover administration costs, such as invoicing and collection of CIL. A further 15% or 25% neighbourhood contribution (dependent upon whether there is a Neighbourhood plan in place and subject to “capping” arrangements where not) is deducted by the Councils and in the case of Broadland and South Norfolk is required to be paid over to the relevant Parish/Town Council. As Norwich is un-parished the community element of CIL (15%) is retained and managed by Norwich City Council.
3. The majority of the remaining balance (e.g. excluding amounts arising from “capping” and surcharges) of CIL revenues from each of the Councils is paid into the Infrastructure Investment Fund to be used for infrastructure investment, identified in the long-term capital programme to 2026.
4. The Infrastructure Investment Fund is administered by the Greater Norwich Growth Board (GNGB) – a partnership of the three District Authorities working with Norfolk County Council and New Anglia Local Enterprise Partnership (the LEP). Norfolk County Council has been appointed as the Accountable Body.
5. The GNGB has responsibility for overseeing the delivery of the strategic infrastructure identified as being required to support the planned growth of the Greater Norwich area. The Board agrees an annual programme of infrastructure projects to be delivered by the GNGB via a Greater Norwich Growth Programme which will be funded either wholly or in part from the Infrastructure Investment Fund.

Reporting information as required by the Community Infrastructure Levy Regulation 62 (4) for the year 2018 to 2019, for the element of CIL which is pooled across the authorities of Broadland District Council, Norwich City Council and South Norfolk Council.

Through the City Deals it was agreed that the Councils, in their reporting requirements for the use of CIL, do not have to comply with the requirement to report at individual district and project level the amount of CIL which they have individually utilised. Instead the authorities can jointly state the amount of CIL they have used as a total and list those projects which CIL has funded.

The Total CIL receipts owed to the Infrastructure Investment Fund to 31 March 2019: **£15,654,753.07**. CIL receipts received by 31 March 2019: **£12,936,359.10** (Q3-4 receipts arrive in Q1-2 of the following year).

The below table shows the annual CIL received by each Greater Norwich district.

	2017/18	2018/19
Broadland	£1,345,002.25	£1,910,239.90
Norwich	£635,043.65	£713,093.25
South Norfolk	£1,353,525.23	£3,086,343.31
TOTAL	£3,333,571.13	£5,709,676.46
Cumulative Total	£9,945,076.61	£15,654,753.07

The Infrastructure Investment Fund is used to support the delivery of a capital programme of projects which is approved annually by the Greater Norwich Growth Board. The list of projects approved by the Board to receive funding from the IIF is called the Growth Programme. The latest Growth Programme is available to view here:

<http://www.greaternorwichgrowth.org.uk/delivery/growth-programme/>

The total CIL expenditure and the items of infrastructure to which CIL has been applied to date is **£9,353,902** as shown in the table below:

Project	Total Drawdown to 018/19
GP1 Harrisons' Wood	£39,156
GP2 Danby Wood *	£25,862
GP3 Marston Marsh *	£24,445
GP4 Earlham Millennium Green - Phase 1 *	£3,160
GP5 Riverside Walk *	£48,361
GP6 Marriott's Way - Phase 1 *	£60,000
GP7 Norwich Health Walks *	£37,852
GP8 Earlham Millennium Green - Phase 2 *	£52,121
GP9 Marriott's Way - Phase 2 *	£245,406
GP10-GP19 NATS Programme *	£1,256,000
GP22 Pink Pedalway - Heathgate *	£150,000
GP23 Carrow Bridge to Deal Ground riverside path	£29,424
GP24 Colney River Crossing (NRP to Threescore)	£78,006
GP29 Barn Road Gateway	£3,640

GP30 Sloughbottom Park - Andersons Meadow	£3,828
GP31 Riverside Walk accessibility improvements	£4,592
GP39 Hales cricket and bowls clubhouse improvements	£4,500
GP40 Wymondham: new sports improvements*	£250,000
GP44 Education 17-18	£2,000,000
GP51 GI Access for All	£27,445
GP52 Thorpe Marriott Greenway	£5,038
GP53 Marriotts Way Surfacing Drayton	£5,366
GP55 Community Sports Hub- The Nest Horsford	£327,101.58
GP25 NDR Loan Repayments	£4,672,598.42

* Projects completed as at end 2018/19

CIL to end of March 2019

Total income to date	£12,936,359.10
Total spend to date	£9,353,902
Compound Interest**	£58,353.95
Balance of CIL receipts to date	£3,640,811.05

**Interest earned on unspent cash reserves till end March 2019



Broadland District Council

CIL Annual Report for 1 April 2018 to 31 March 2019

The Community Infrastructure Regulations 2010 (as amended) requires a “charging authority” (Broadland) to prepare a report for any financial year for which it collects CIL.

*** See Greater Norwich Infrastructure Investment Fund below for CIL expenditure in the Greater Norwich Area**

Regulation	Description	Amount
62		
4(a)	Total CIL receipts	£2,559,752.98
(b)	Total CIL expenditure	£2,535,945.95 * See Tables below
(c)(i)	The items of infrastructure to which CIL has been applied	* See Tables below
(ii)	Amount of CIL expenditure on each item	* See Tables below
(iii)	Amount of CIL applied to repay money borrowed	Nil
(iv)	Amount of CIL applied to administrative expenses	£126,797.36 (5%)
4(ca) (i)	Amount of CIL passed to any Local Council (reg 59A or 59B) (payments made Oct 18 & Apr 19)	£498,908.69
(ii)	Amount of CIL passed to any individual (reg 59(4))	Nil
4(cb)	Summary details of the receipt and expenditure of CIL to which regulations 59A or 59B applied.	See Parish Tables
(i)	The total CIL receipts that regulations 59A or 59B applied to	£498,908.69
(ii)	The items to which the CIL receipts to which regulations 59E and 59F have been applied to	N/A
(iii)	The amount of expenditure on each item	See Parish Table
4(cc)	Summary details of any notices served in accordance with regulation 59E	None
4(d)(i)	The total amount of CIL receipts retained at the end of the reported year, other than those to which reg 59E or 59F applied	£23,807.03
(ii)	CIL receipts from previous years retained at the end of 2016/17 other than those to which regulation 59E or 59F applied	£51,652.75
(iii)	CIL receipts for the reported year to which regulation 59E or 59F applied retained at the end of the reported year	None
(iv)	CIL receipts from previous years to which regulation 59E or 59F applied retained at the end of the reported year	N/A
4(e)	Infrastructure payments	None

CIL funds collected and distributed by BDC for Financial Year 1 April 2018 to 31 March 2019

Parish	Development	Planning No	date received	Gross amount	Admin 5%	Parish / Town		Retain surcharge	GNGB	Total to Parishes
						15%	25%		balance	
Aylsham	Aylsham Watermill	20150899	10.04.18	365.66	18.28	54.85			292.53	
Aylsham	Starbucks, Burgh Road	20170493	17.05.18	7,499.37	312.73	938.18		1,244.86	5,003.60	
Aylsham	Plot 1, Hungate Lodge, Hungate Street	20170952	29.11.10	10,000.00	500.00	1,500.00			8,000.00	
Aylsham	Plot 1, Hungate Lodge, Hungate Street	20170952	30.11.18	476.72	23.84	71.51			381.37	
Aylsham										2,564.54
Beighton	The Old Post Office, Moulton St Mary	20180117	18.04.18	5,659.15	282.96	848.87			4,527.32	848.87
Blofield	Land North of Bullacebush Lane	20171716	05.05.18	9,805.41	490.27		2,451.35		6,863.79	
Blofield	Garden Farm (plots 17A-17E to 20)	20171053	09.07.18	22,604.64	1,130.23		5,651.16		15,823.25	
Blofield	Land North of Bullacebush Lane	20171716	17.08.18	29,416.24	1,470.81		7,354.06		20,591.37	
Blofield	Plot 2, Land off Woodbastwick Road	20170207	28.08.18	3,792.05	189.60		948.01		2,654.44	
Blofield	Land adj. The Manse, Globe Lane	20171081	31.12.18	17,369.71	868.49		4,342.43		12,158.79	
Blofield	Plot 4, Land of Woodbastwick Road	20170207	09.01.19	11,376.16	568.81		2,844.04		7,963.31	
Blofield	Land North Yarmouth Road	20172131	18.01.19	321,974.72	16,098.74		80,493.68		225,382.30	
Blofield										104,084.73
Cawston	Valley Farm, Booton Road	20180283	23.10.18	3,143.97	157.20	471.60			2,515.17	
Cawston	Perrys Lane Farm	20130598	26.02.19	750.00	37.50	112.50			600.00	
Cawston	Wood Farm, Brandiston Road	20151358	28.02.19	13,147.33	657.37	1,972.10			10,517.86	
Cawston										2,556.20
Coltishall	Westbourne House, 6 Westbourne Road	20181120	29.12.18	7,364.58	368.23	1,104.69			5,891.66	
Coltishall	Westbourne House, 6 Westbourne Road	20181120	29.03.19	22,093.75	1,104.69	3,314.06			17,675.00	
Coltishall										4,418.75
Drayton	Plot 5, 35 School Road	20180448	20.07.18	23,894.20	1,194.71		5,973.55		16,725.94	
Drayton	Plot 6, 35 School Road	20161832	20.07.18	20,683.93	1,034.20		5,170.98		14,478.75	
Drayton	16 Station Road	20170889	28.11.18	1,567.57	78.38		391.89		1,097.30	
Drayton	16 Station Road	20181693	04.01.19	207.50	10.38		51.88		145.24	
Drayton										11,588.30

Felthorpe	Valley Farm, Holt Road	20141319	07.12.18	21,830.75	1,091.54	3,274.61			17,464.60	3,274.61
Foulsham	Bates Moor Farm	20180951	06.08.18	1,537.05	76.85	230.56			1,229.64	
Foulsham	18 High Street	20160336	28.08.18	3,607.26	180.36	541.09			2,885.81	
Foulsham	Wakefield Farm, Guestwick Road	20170882	06.12.18	52,494.15	2,624.71	7,874.12			41,995.32	
Foulsham										8,645.77
Frettenham	Land Rear 17/19 Mayton Avenue	20142022	23.10.18	7,802.56	390.13	1,170.38			6,242.05	1,170.38
Great Plumstead	Plots 2, 3, 4, 8, 9, 10 & 11 Land NE Church Road	20161151	28.09.18	22,363.72	1,118.19				5,590.93	15,654.60
Great Plumstead	Plot 1, Land NE of Church Road	20180309	28.09.18	5,905.96	295.30				1,476.49	4,134.17
Great Plumstead	Land off Rosebery Road	20171999	11.01.19	48,298.50	2,414.93				12,074.63	33,808.94
Great Plumstead										19,142.05
Guestwick	The White House, Old School Road	20171483	23.08.18	2,351.20	117.56	352.68			1,880.96	352.68
Hellesdon	Royal Norwich Golf Club, Drayton High Road	20171514	03.09.18	108,857.45	5,442.87				27,214.36	76,200.22
Hellesdon	63 Woodland Road	20180483	27.12.18	17,865.10	893.26				4,466.28	12,505.56
Hellesdon										31,680.64
Heydon	Dairy Farm Barns, Heydon Lane	20151208	05.10.18	18,675.80	933.79	2,801.37			14,940.64	
Heydon	Church Farm Barns	20180892	07.03.19	5,868.75	293.44	880.31			4,695.00	
Heydon										3,681.68
Horsford	Land East of Holt Road	20161770	17.07.18	391,528.10	19,576.41	58,729.22			313,222.47	
Horsford	181 Holt Road	20172140	06.08.18	17,920.65	896.03	2,688.10			14,336.52	
Horsford	246 Holt Road	20161957	15.08.18	9,574.71	478.74	1,436.21			7,659.76	
Horsford	Plot 1, Land East of Holt Road	20181061	24.09.18	1,423.17	71.16				355.80	996.21
Horsford	The Nest, Manor Park, Holt Road	20171154	24.10.18	3,681.29	184.06	552.19			2,945.04	
Horsford	Glebe Farm, Holt Road	20180414	10.01.19	3,109.04	155.45	466.36			2,487.23	
Horsford	181 Holt Road	20172140	29.01.19	53,761.94	2,688.10	8,064.29			43,009.55	
Horsford	Land East of Holt Road	20161770	11.02.19	391,528.10	19,576.41	58,729.22			313,222.47	
Horsford										131,021.39
Horsham St Faith	Black Swann, 25 Norwich Road	20180082	28.04.18	250.00	12.50	37.50			200.00	
Horsham St Faith	Black Swann, 25 Norwich Road	20180082	28.05.18	250.00	12.50	37.50			200.00	
Horsham St Faith	Black Swann, 25 Norwich Road	20180082	28.06.18	250.00	12.50	37.50			200.00	

Horsham St Faith	Black Swann, 25 Norwich Road	20180082	28.07.18	250.00	12.50	37.50			200.00	
Horsham St Faith	Black Swann, 25 Norwich Road	20180082	28.08.18	250.00	12.50	37.50			200.00	
Horsham St Faith	Black Swann, 25 Norwich Road	20180082	28.09.18	250.00	12.50	37.50			200.00	
Horsham St Faith	Black Swann, 25 Norwich Road	20180082	28.10.18	250.00	12.50	37.50			200.00	
Horsham St Faith	Black Swann, 25 Norwich Road	20180082	28.11.18	250.00	12.50	37.50			200.00	
Horsham St Faith	Black Swann, 25 Norwich Road	20180082	28.12.18	250.00	12.50	37.50			200.00	
Horsham St Faith	Black Swann, 25 Norwich Road	20180082	28.01.19	250.00	12.50	37.50			200.00	
Horsham St Faith	Black Swann, 25 Norwich Road	20180082	28.02.19	250.00	12.50	37.50			200.00	
Horsham St Faith	Black Swann, 25 Norwich Road	20180082	28.03.19	250.00	12.50	37.50			200.00	
Horsham St Faith										450.00
Horstead with Stanninghall	Cedars, 16 Green Lane	20181635	01.02.19	5,729.02	286.45	859.35			4,583.22	859.35
Marsham	26 Old Norwich Road	20180442	30.07.18	6,383.66	319.18	957.55			5,106.93	
Marsham	Field Opp 19 Allison Street	20172051	24.08.18	1,851.45	92.57	277.72			1,481.16	
Marsham										1,235.27
Postwick	10 Oaks Lane	20170134	29.06.18	19,019.58	825.98	2,477.94		2,500.00	13,215.66	2,477.94
Rackheath	Land off Salhouse Road (off Sam Smith Way)	20180707	24.10.18	10,437.99	434.92		2,174.58	1,739.66	6,088.83	
Rackheath	Sports Pavilion, Green Lane West	20162059	20.02.19	4,671.76	233.59	700.76			3,737.41	
Rackheath										2,875.34
Reedham	Land at Station Road, Plots 1, 22 - 24	20171054	04.05.18	39,739.96	1,987.00	5,961.00			31,791.96	5,961.00
Reepham	Rays Hall	20131806	15.04.18	100.00	5.00	15.00			80.00	
Reepham	Rays Hall	20131806	15.05.18	100.00	5.00	15.00			80.00	
Reepham	Rays Hall	20131806	15.06.18	100.00	5.00	15.00			80.00	
Reepham	Rays Hall	20131806	15.07.18	100.00	5.00	15.00			80.00	
Reepham	Rays Hall	20131806	15.08.18	100.00	5.00	15.00			80.00	
Reepham	Rays Hall	20131806	15.09.18	100.00	5.00	15.00			80.00	
Reepham	Rays Hall	20131806	15.10.18	100.00	5.00	15.00			80.00	
Reepham	Rays Hall	20131806	15.11.18	100.00	5.00	15.00			80.00	
Reepham	Rays Hall	20131806	15.12.18	100.00	5.00	15.00			80.00	

Reepham	Rays Hall	20131806	15.01.18	100.00	5.00	15.00			80.00	
Reepham	Rays Hall	20131806	15.02.19	100.00	5.00	15.00			80.00	
Reepham	Rays Hall	20131806	15.03.19	100.00	5.00	15.00			80.00	
Reepham	32 School Road	20161817	18.03.19	7,580.92	379.05	1,137.14			6,064.73	
Reepham										1,317.14
Salhouse	Salhouse Hall	20172210	04.10.18	9,112.28	455.61		2,278.07		6,378.60	
Salhouse	Salhouse Hall	20172210	24.10.18	6,639.02	331.95		1,659.76		4,647.31	
Salhouse										3,937.83
Sprowston	51 Cozens Hardy Road	20152062	01.05.18	509.89	25.49		127.47		356.93	
Sprowston	51 Cozens Hardy Road	20152062	01.06.18	500.00	25.00		125.00		350.00	
Sprowston	51 Cozens Hardy Road	20152062	01.07.18	500.00	25.00		125.00		350.00	
Sprowston	51 Cozens Hardy Road	20152062	01.08.18	500.00	25.00		125.00		350.00	
Sprowston	Lidl North Blue Boar Lane	20161382	22.08.18	366,450.27	18,322.51		91,612.57		256,515.19	
Sprowston	51 Cozens Hardy Road	20152062	01.09.18	500.00	25.00		125.00		350.00	
Sprowston	Lidl North Blue Boar Lane	20161382	21.09.18	19,469.55	57.35		286.76	18,322.51	802.93	
Sprowston	51 Cozens Hardy Road	20152062	01.10.18	500.00	25.00		125.00		350.00	
Sprowston	45 Tills Road	20180789	18.10.18	4,768.36	238.42		1192.09		3,337.85	
Sprowston	51 Cozens Hardy Road	20152062	01.11.18	500.00	25.00		125.00		350.00	
Sprowston	51 Cozens Hardy Road	20152062	01.12.18	500.00	25.00		125.00		350.00	
Sprowston	51 Cozens Hardy Road	20152062	01.01.19	500.00	25.00		125.00		350.00	
Sprowston	51 Cozens Hardy Road	20152062	01.02.19	500.00	25.00		125.00		350.00	
Sprowston	51 Cozens Hardy Road	20152062	01.03.19	500.00	25.00		125.00		350.00	
Sprowston										94,468.89
Strumpshaw	31 Norwich Road (Former Hamper People)	20140426	21.11.18	1,493.75	74.69	224.06			1,195.00	
Strumpshaw	Land at Mill Road (10 Units)	20171622	21.02.19	90,000.00	4,500.00		22,500.00		63,000.00	
Strumpshaw	Land at Mill Road (10 Units)	20171622	22.02.19	25,436.22	1,271.81		6,359.06		17,805.35	
Strumpshaw										29,083.12
Swannington	Swannington Manor	20181131	07.09.18	1,124.77	56.24	168.72			899.81	168.72
Taverham	Wensum Valley Golf Course	20171676	02.05.18	20,806.94	1,040.35	3,121.04			16,645.55	
Taverham	Wensum Valley Golf Course	20171676	03.05.18	22,000.00	1,100.00	3,300.00			17,600.00	
Taverham	248 Fakenham Road	20180388	10.08.18	1,067.90	53.40	160.19			854.31	
Taverham	52 Laburnum Avenue	20181204	09.11.18	6,843.38	342.17	1,026.51			5,474.70	
Taverham	248B Fakenham Road	20171958	23.11.18	2,922.56	146.13	438.38			2,338.05	
Taverham										8,046.12

Thorpe St Andrew	27 Yarmouth Road	20170811	11.07.18	30,051.15	1,502.56	4,507.67			24,040.92	
Thorpe St Andrew	Plot 14, Peachman Way	20181376	22.03.19	26,164.84	1,308.24	3,924.73			20,931.87	
Thorpe St Andrew										8,432.40
Weston Longville	Weston Park Golf Club	20151771	13.04.18	19,242.69	962.13	2,886.40			15,394.16	
Weston Longville	Norfolk Dinosaur Park	20180160	15.06.18	14,855.27	742.76	2,228.29			11,884.22	
Weston Longville	Clubhouse, Weston Park Golf Club	20171962	22.08.18	17,428.12	871.41	2,614.22			13,942.49	
Weston Longville	Norfolk Dinosaur Park	20180160	19.12.18	44,565.82	2,228.29	6,684.87			35,652.66	
Weston Longville										14,413.78
Woodbastwick	Pedham Lodge	20182058	26.03.19	1,007.95	50.40	151.20			806.35	151.20

Totals				2,559,752.98	126,797.36	202,616.81	296,291.88	23,807.03	1,910,239.90	498,908.69
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Total CIL receipts received by Broadland District Council	£2,559,752.98
Total amount distributed to Parish/Town Councils	£498,908.69
Total passed to Greater Norwich Investment Fund	£1,910,239.90
Total kept by BDC for administration	£126,797.36
Total retained by Broadland District Council	£23,807.03

Funds were distributed to parishes in October 2018 and April 2019

Funds were passed to the Greater Norwich Infrastructure Investment Fund in April 2019

Broadland District Council Parish CIL Expenditure 1 April 2018 to 31 March 2019

Parish/Town	Project	Date Paid	Expenditure
Acle	New Litter Bin and Bin Collection	18/19	178.30
Aylsham	World War One Seat	18/10/18	829.50
Great & Little	Andrew Golland – Feasibility Report	12/04/18	4,620.00
Great & Little	Defibrillators and Cabinets	13/05/18	2,500.00
Great & Little	Gt Plumstead Carpark	29/11/18	8,520.00
Gt & Lt Plumstead			15,640.00
Haveringland	Haveringland road signs (NCC Parish Partnership)	08/05/18	490.00
Haveringland	Purchase of road salt bins x2	15/10/18	209.04
Haveringland	Purchase and siting of new parish/church	31/03/19	200.00
Haveringland Total			899.04
Horsford	High-Viz vests for primary school children	06/09/18	1,080.00
Horsford	Mill Lane lighting upgrade to LED	01/10/18	1,303.20
Horsford	CCTV to cover play equipment and hall	07/12/18	9,811.60
Horsford	Fencing for Pre-school outdoor play	04/03/19	1,300.00
Horsford Total			13,494.80
Horsham & Newton St Faith	Replace and upgrade to LED two street lighting columns	16/07/18	2,300.00
Reepham	Picnic Table at Play Area	02/07/18	595.00
Reepham	Town Noticeboard	26/10/18	1,353.43
Reepham	Three Picnic Tables at Recreation Ground	30/11/18	630.00
Reepham Total			2,578.43
South Walsham	Wicksteed leisure - play equipment (part)	14/05/18	1,264.01
Sprowston	Sprowston Diamond Centre redevelopment costs	Jan 19	92,526.80
Strumpshaw	Contribution to road improvements on Mill Road	18/19	9,619.69
Swannington with Alderford & Lt Witchingham	Donation to Swannington Play Area Ltd	21/11/18	168.72
Taverham	CCTV Upgrade - Hinks Meadow	18/19	3,428.00
Taverham	Felling of trees in relation to CCTV upgrade	18/19	420.00
Taverham	Replacement Noticeboards - Hinks Meadow and Fakenham Road	18/19	1,550.45
Taverham Total			5,398.45
Thorpe St Andrew	Materials for pathways - Fitzmaurice Park	30/04/18	1,575.00
	Total reported parish/town council CIL		146,472.74

NB - Based on information supplied by town and parish council's at time of production of this report



NORWICH
City Council

**Norwich City Council Community Infrastructure
Levy (CIL)**

Regulation 62
Monitoring Report 2018/2019

1 Introduction

- 1.1. The Norwich City Council Community Infrastructure Levy (CIL) Charging Schedule was approved by Full Council on the 25th June 2013 and came into effect on the 15th July 2013. Planning applications determined on or after the 15th July 2013 may therefore be subject to CIL.
- 1.2. The City Council is party to a Joint Working Agreement entered into with the Local Authorities and the LEP participating in the Greater Norwich Growth Board (GNGB). (Broadland District Council, Norwich City Council, South Norfolk Council and Norfolk County Council are the Local Authorities for the Greater Norwich area. New Anglia LEP is the Local Enterprise Partnership for Norfolk and Suffolk).
- 1.3. The GNGB is the body responsible for delivering the strategic infrastructure identified as being required to support the planned growth in the Greater Norwich area. In accordance with the Community Infrastructure Regulations 2010 (as amended) regulation 123 a list of infrastructure identified has been published and can be viewed at https://www.norwich.gov.uk/downloads/file/1539/13_regulation_123_listpdf.
- 1.4. The Joint Working Agreement agreed between the participating members of the GNGB confirms that Norwich City Council have agreed to transfer 80% of the CIL revenues collected by the authority to an Infrastructure Investment Fund to be administered by the Greater Norwich Growth Board. Norfolk County Council has been appointed as the Accountable Body.
- 1.5. The parties to the Joint Working Agreement will agree an annual programme of infrastructure projects to be delivered by the GNGB via a Greater Norwich Growth Programme which will be funded via the Infrastructure Investment Fund. Further details about the delivery of Greater Norwich Growth Programme are available via the following link <http://www.greaternorwichgrowth.org.uk/growth-board/>
- 1.6. The CIL regulations require that 15% of CIL revenues received by the City Council (or 25% where there is a neighbourhood plan) are retained as neighbourhood funding to be spent on local infrastructure projects or anything else that is concerned with addressing the demands that development places on an area. The City Council will be obliged to use existing community consultation and engagement processes in deciding how the neighbourhood funding element will be spent. This is to help communities to accommodate the impact of new development and encourage local people to support development by providing direct financial incentives to be spent on local priorities.
- 1.7. The Community Infrastructure Regulations 2010 (as amended) require a Charging Authority to prepare a report for any financial year in which-:
 - a) It collects CIL, or CIL is collected on its behalf; or
 - b) An amount of CIL collected by it or by another person on its behalf (whether in the reported year or any other) has not been spent.

The financial year to which this document relates is 2018/19

2 Reporting

Table 1 below sets out the CIL Reporting information as required by CIL Regulation 62 (4).

Regulation 62 reference	Description	Amount
4.(a)	Total value of CIL Demand Notices raised in 2018/19	£788,244
	Total CIL receipts for 2018/19	£891,367
	Total CIL payable in 2019/20 from Demand Notices issued in 2018/19.	£362,382
4.(b)	Total CIL expenditure in 2018/19 (From CIL receipts retained for neighbourhood funding)	£6,684
4.(c) (i) & (ii)	The items of infrastructure to which CIL receipts retained for neighbourhood funding have been applied and amount of CIL funded expenditure on each item -:	
	1. Community Infrastructure	£515
	2. Transportation	£138
	3. Green Infrastructure	£6,031
4.(c) (iii)	Amount of CIL applied to repay money borrowed, including any interest, with details of the infrastructure items which that money was used to provide (wholly or in part)	Not Applicable
4.(c) (iv)	Amount of CIL applied to administrative expenses pursuant to regulation 61, and that amount expressed as a percentage of the CIL Demand Notices issued in that year in accordance with regulation 61.	£39,412 (5%)
4.(ca) (i)	Amount of CIL paid to any local council under regulation 59A or 59B	Not Applicable
4.(ca) (ii)	Amount of CIL paid to the Greater Norwich Growth Board Infrastructure Investment Fund under regulation 59(4) (See Note 1)	£713,093
4.(d) (i)	Total amount of CIL receipts retained at the end of the reported year.	£401,947

Note 1-: Details of the Greater Norwich Growth Programme approved for 2018/19 and the infrastructure expenditure funded from the Greater Norwich Growth Board's Infrastructure Investment Fund can be accessed via the following link-:

<http://www.greaternorwichgrowth.org.uk/growth-board/meetings/>

Note 2:- Details of expenditure funded by the Greater Norwich Growth Board's Infrastructure Investment Fund in Norwich City Council statutory area-:

Project	CIL Funded Expenditure 2016/17	CIL Funded Expenditure 2017/18	CIL Funded Expenditure 2018/19
Earlham Millennium Green – Access Improvements.	£38,876	£939	£3,750
Marriott's Way – Path resurfacing, lighting, landscaping works.	£828	£0	£0
Riverside Walk – Extension of riverside walk by NCFC.	£29,424	£0	£0
Golden Ball Street/Westlegate - Public Realm Improvements	£0	£724,000	£0
Finkelgate Junction Improvements	£0	£299,000	£0
Bowthorpe Crossing – Construction of new footbridge over River Yare.	£47,593	£30,414	£89,771
Marriott's Way –Barn Road Gateway	£0	£4,680	£35,320
Riverside Walk Accessibility & Signage	£0	£4,592	£1,976
Marriott's Way – Andersons Meadow to Sloughbottom Park	£0	£5,970	£44,591
Norwich Push The Pedalways – Eaton Project	£0	£0	£100,000
Norwich Push The Pedalways – Chartwell Road Project	£0	£0	£113,000
Total	£116,721	£1,069,595	£388,408

3 Further Information

3.1 For further information about the Norwich City Council Community Infrastructure Levy including the Charging Schedule, Instalment Policy, and Regulation 123 list can be obtained from-:

https://www.norwich.gov.uk/info/20017/planning_applications/1142/community_infrastructure_levy_cil

3.2 Further general information about the Community Infrastructure Levy can be obtained from the following sources:-

<http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil>

<http://planningguidance.planningportal.gov.uk/blog/guidance/community-infrastructure-levy/>

South Norfolk Community Infrastructure Levy (CIL) report for 1st April 2018 to 31st March 2019

Regulation 62 of The Community Infrastructure Regulations 2010 (as amended) requires a “charging authority” (South Norfolk) to prepare a report for any financial year for which it collects CIL.

* See Greater Norwich Infrastructure Investment Fund for the whole Greater Norwich Area

Reporting Information as required by the Community Infrastructure Levy Regulation 62(4) for the year 2018 to 2019 for South Norfolk Council

Regulation 62	Description	Amount
4(a)	Total CIL receipts	£3,857,929.23
(b)	Total CIL expenditure	*
(c)(i)	The items of infrastructure to which CIL has been applied	*
(ii)	Amount of CIL expenditure on each item	*
(iii)	Amount of CIL applied to repay money borrowed	*
(iv)	Amount of CIL applied to administrative expenses	£192,896.46
4(ca) (i)	Amount of CIL passed to any Local Council (reg 59A or 59B) (payments made Oct 18 & Apr 19)	£574,781.33
(ii)	Amount of CIL passed to any individual (reg 59(4))	NONE
4(cb)	Summary details of the receipt and expenditure of CIL to which regulations 59E or 59F applied.	See Parish Table
(i)	The total CIL receipts that regulations 59E or 59F applied to	£26,053.29
(ii)	The items to which the CIL receipts to which regulations 59E and 59F have been applied to	NONE
(iii)	The amount of expenditure on each item	NONE
4(cc)	Summary details of any notices served in accordance with regulation 59E	NONE
4(d)(i)	The total amount of CIL receipts retained at the end of the reported year, other than those to which reg 59E or 59F applied	NONE
(ii)	CIL receipts from previous years retained at the end of 2017/18 other than those to which regulation 59E or 59F applied	NONE
(iii)	CIL receipts for the reported year to which regulation 59E or 59F applied retained at the end of the reported year	£3908.00
(iv)	CIL receipts from previous years to which regulation 59E or 59F applied retained at the end of the reported year	£2492.55
4(e)	Infrastructure payments	None

CIL Payments made to Parishes for Financial Year 2018/2019

Parish	Gross Amount received	15% to Parish	25% to Parish	Retained by SNC
Aldeby	£765.33	£114.80		
Alpington	£2,410.23	£361.53		

Ashby St Mary	£8,166.45	£1224.97		
Ashwellthorpe	£24,255.70	£3638.36		
Aslacton	£3,172.73	£475.82		
Barford	£12,860.76	£1929.11		
Bawburgh	£9,970.68	1495.60		
Bergh Apton	£63,470.89	£9520.63		
Bracon Ash & Hethel	£17,265.12	£2589.76		
Bressingham	£40,351.26	£6052.70		
Brockdish	£3,169.62	£475.44		
Brooke	£81,186.61	£12,178.00		
Broome	£36,744.64	£5,511.70		
Bunwell	£11,455.24	£1718.29		
Burston & Shimpling	£22,925.02	£3438.75		
Carleton Rode	£5,705.32	£855.80		
Colney	£22,036.37			£3305.46
Costessey	£114,420.57	£17,163.09		
Dickleburgh	£122,477.79	£18,371.68		
Diss	£484,797.37	£72,719.62		
Earsham	£633.92	£95.09		
Framingham Pigot	£3000			£450.00
Geldeston	£122,210.25	£18,331.54		
Gissing	£12938.52	£1,940.78		
Great Moulton	£23,871.52	£3,580.72		
Hales	£15,583.97	£2,337.60		
Hempnall	£4,053.60	£608.04		
Hingham	£8057.44	£1,208.62		
Ketteringham	£4,355.59	£653.33		
Kirby Cane	£6347.09	£952.06		
Little Melton	£137,602.62	£20,640.40		
Loddon	£2,938.44	£440.77		
Marlingford & Colton	£33,450.03	£5,017.50		
Morningthorpe & Fritton	£2,637.39	£395.61		
Poringland	£1,063,739.85	£159,560.98		
Pulham Market	£1,426.33	£213.95		
Pulham St Mary	£91,818.22	£13,772.73		
Redenhall with Harleston	£45,680.56	£6,852.09		
Rockland St Mary	£61,832.36	£9,274.85		
Runhall	£1,347.09	£202.06		
Seething	£15,006.17	£2,250.93		
Spooner Row	£175,989.55	£26,398.43		
Starston	£2132.89	£319.93		
Stockton	£1016.92			£152.54
Stoke Holy	£553,131.25	£82,969.68		

Cross				
Surlingham	£75,628.52	£11,344.28		
Swainsthorpe	£24,365.02	£3,654.76		
Thurlton	£32,736.24	£4,910.44		
Thurton	£686.75	£103.01		
Tibenham	£508.46	£76.27		
Tivetshall St Margaret	£9,108.02	£1366.20		
Wortwell	£3,895.99	£584.40		
Wreningham	£2,377.22	£356.58		
Wymondham	£230,213.74	£34,532.05		
Total	£3,857,929.23	£574,781.33		£3908.00

Total receipts received by SNC	£3,857,929.23
Total amount to parish/town Councils	£574,781.33
Total for administration	£192,896.59
Total passed to GNIIF	£3,086,343.31
Total retained by SNC	£3,908.00

South Norfolk Council Parish CIL Expenditure 1 April 2018 to 31 March 2019

Parish	Project	Expenditure
Aldeby	Grounds maintenance	£114.80
Bressingham	Speed signs	£853.60
	Litter bins	£670.00
	3 new notice boards	£565.00
	No litter signs	£1,066.20
	Village hall lighting	£1,063.05
Bunwell	Playground equipment repair and renew	£1,260.00
	New parish noticeboard	£495.00
	Commemorative bench	£722.00
	Cabinet for defibrillator	£720.00
Caistor St Edmund	SAM2 machine	£850.00
	Grounds care equipment	£1,060.83
	Personal protective equipment	£149.75
	Bulbs for raking pit	£266.24
Cringleford	Street light replacement	£24,044.00
Dickleburgh & Rushall	Refurbishment of VC Ladies toilets	£9,633.98
Gillingham	Enhancement of outside seating area of village hall	£450.00
Hales	Provision of play equipment	£3,466.21
Heckingham	Provision of play equipment	£2,896.84
Hellington	Purchase of bench	£227.44
Hethersett	Refurbishment & installation of seating for bus shelter	£1,629.42
Loddon	Skate park	£5,405.51
Long Stratton	Pavillion project	£5,101.09
Norton Subcourse	Parish Council notice board	£409.00
Pulham St Mary	Contribution towards playground	£1,567.08

	equipment	
Rockland St Mary	Fencing to develop area at Black Horse dyke car park	£323.46
Saxlingham Nethergate	Maintenance of railings around war memorial	£439.61
Surlingham	Repairs to Parish hall	£13,869.97
Swardeston	50% cost of speed awareness machine	£1,672.50
	Additional waste bin on Swardeston Common	£246.00
Tasburgh	Grit bin for top of Church Hill	£99.45
Tharston & Hapton	Bus shelter	£736.16
	Waste bins	£152.96
Tibenham	Boardwalk installed on footpath	£132.56
Tivetshall St Margaret	CCTV over playing field and play equipment	£1,500.00
	Speed awareness monitoring equipment	£859.75
Wreningham	New windows at village hall	£3,480.00
	Contribution to SAM2 machine	£1,675.00
	Contributions to community projects	£1,507.50
Wymondham	Becketswell -footpath construction	£11,899.00
	Ketts Park – new office build	£48,053.13

Nb. Based on information supplied by Town and Parish Council's at time of production of report

CIL receipts retained by South Norfolk Council Expenditure 1 April 2018 to 31 March 2019

No Expenditure in this period

Appendix C – Duty to Cooperate

2018/19 Duty to Cooperate Update

The Localism Act (2011) requires this report to include action taken under the Duty to Cooperate. All local authorities have a statutory duty to cooperate with neighboring local planning authorities and other bodies on planning issues which have a strategic impact across local authority boundaries. This duty is being achieved through the establishment of various organisations to oversee county wide delivery and planning related concerns; the preparation of the Norfolk wide strategic framework to guide and inform the preparation of individual/Joint local plans and ensure that strategic land use issues of cross boundary significance are properly addressed; and the production of joint evidence bases for strategic issues. All of these are detailed in the following sections.

Organisation

The formal establishment of the **Greater Norwich Growth Broad (GNGB)**, with a stronger focus on delivery is led by Member level board including the Chair of the New Anglia LEP. The board is supported by a Director's group, dedicated staff and officer level groupings including planning policy officers. It over sees the implementation of the infrastructure investment programme across Greater Norwich. Through the provision of the Greater Norwich **City Deal** and efforts from the GNGB programme delivery has been successful. Infrastructure constraints on future development have eased considerably in recent years. The Greater Norwich Growth Programme is developed and approved by Broadland Council, Norwich City Council, South Norfolk Council, Norfolk County Council and the New Anglia Local Enterprise Partnership, working as the Greater Norwich Growth Board. The programme is drawn together from the Joint five year Infrastructure Investment Plan and identifies schemes to be prioritised for delivery within each financial year.

The Growth Programme is assessed annually and sets out the financial implications for income and expenditure for the forthcoming year and the cumulative financial impact of funding decisions. The Greater Norwich Growth Programme for 18/19 was endorsed by the GNGB at its meeting on 12th March 2018.

This arrangement replaced the **Greater Norwich Development Partnership (GNDP)** which oversaw the development of the JCS (Adopted) (2011) (2014). However, the GNDP has been re-established to provide political guidance to the joint planning team during the plan-making process for the Greater Norwich Local Plan (GNLP), scheduled for adoption in 2022. The partnership consists of representatives from the three Greater Norwich authorities, Norfolk County Council and the Broads Authority. At senior officer level, the **Greater Norwich Infrastructure Delivery and Planning Board (GNIDPB)** serves both the GNDP and GNDB. Membership of this Director's Board consist of representatives of all four councils, the LEP and the Broads Authority.

Norfolk authorities have a strong record of working together through a range of formal and less formal mechanisms. A Strategic Officer Group has been established for many years and in January 2014 a **Members Forum** was established with the overall purpose of ensuring that the requirements of Duty were met. This comprised Members from each of the Norfolk district councils and the Broads Authority together with Norfolk County Council (the 'Core Group') supported by the **Norfolk Strategic Planning Officer Group (NSPG)** which meets on a quarterly basis to progress work under the duty. Its terms of reference were reviewed in January 2015.

The Forum's overall purpose is to ensure that the requirements of Duty to Cooperate when preparing development plans is discharged in a way which enhances the planning and strategic matters and minimises the risk of unsound plans. It will provide the political input and steerage necessary to discharge the duty.

The Forum has agreed to meet for the purposes set out in the terms of reference to provide a vehicle for cooperation and joint working between local authorities and other parties within Norfolk and across any other area over which the duty may be applied. They will act together in accordance with their powers under sections 13,14 and 33A of the Planning and Compulsory Purchase Act and Section 1 of the Localism Act 2011 for this purpose. The Forum is not a decision-making body and will recommend actions to partner authorities. It will aim to reach a consensus where possible. Its recommendations are not binding on the actions of any of the partners.

The Forum is currently overseeing the preparation of the Norfolk Strategic Planning Framework (NSPF) which considers and seek agreement in relation to the strategically important cross boundary issues affecting the delivery of growth in Norfolk. This framework is intended to inform the preparation of statutory development plans.

The NSPF has been formally endorsed by all Norfolk authorities and published on the Norfolk County Council website in 2018. The framework contains high level agreements on how to work together constructively on strategic planning matters across the county. The framework is a live document that will be updated to reflect the latest change in government legislation. As such, following the requirement set out in Government's new National Planning Policy Framework (NPPF), the second iteration of the framework has been produced reflecting the impacts of the new housing methodology and the ability of each authority to meet its own housing needs as well as meeting the requirement having a Statement of Common Ground. This revised second iteration was formally endorsed by all stakeholder authorities in October 2019.

The Norfolk Strategic Planning Officers Group (NSPG) is a monthly meeting of senior planning policy officers from all the local planning authorities in Norfolk plus the County Council and Environment Agency. Representatives of other disciplines and agencies attend as appropriate. The NSPG supports the Member Forum. A representative of the NSPG sit on the regional Strategic Spatial Planning Officer Liaison Group (SSPOLG) which supports planning cooperation across the wider South East (East of England, Greater London and South of East of England).

Joint Evidence Base

Furthermore, as part of joint working a number of joint evidence base documents have been produced covering a wider area for a more strategic purpose and these include the following:

Strategic Housing Market Assessment (SHMA) (2017)

The updated SHMA (2017) built on the work of the Central Norfolk SHMA 2015 to produce new estimates for OAN and affordable housing needs and types of dwellings across Central Norfolk. In summary this SHMA provides new OAN for Central Norfolk to consider. Revisions to the NPPF in 2019 now mean that the quantity of homes needed are calculated in accordance with the standard methodology in national guidance. This currently applies a fixed uplift to household projections based on the relationship between local incomes and house prices for each local authority area with the result being capped to ensure that resulting figures are no more than 40% above existing requirements. The standard methodology is scheduled to be revised in 2020.

The types and tenures of dwelling required are still currently determined by SHMA 2017, until updates emerge from the new housing needs study due to be commissioned in 2020.

The SHMA produced in 2015 by Opinion Research Services (ORS) was jointly commissioned by the Central Norfolk local authorities (Norwich City, Broadland, Breckland, North Norfolk, together with the Broads Authority Executive Area) to identify the functional Housing Market Areas (HMAs) covered by five local authorities, in particular to establish the extent of the Central Norfolk HMA. Subsequently, ORS prepared a Strategic Housing Market Assessment (SHMA) to establish the Objectively Assessed Need (OAN) for housing across the Central Norfolk area. Norfolk County Council is also a non-commissioner partner.

Norfolk Housing and Economic Land Availability Assessment (HELAA)

Housing and Economic Land Availability Assessments (HELAAAs) are key evidence documents which support the preparation of local plans. Their purpose is to establish how much suitable development land there is in an area and to test if this land could be developed. They help local planning authorities to understand the level of growth they can plan for and the areas where growth can be accommodated. These assessments are not policy documents and they do not determine if land should be allocated for development or if planning permission should be granted. As part of the Duty to Co-operate a consistent methodology for producing HELAAAs is being used across all of the planning authorities in Norfolk. As such The Norfolk HELAA methodology (July 2016) applies to the following authorities:

- Breckland District Council
- Broadland District Council
- Broads Authority
- Great Yarmouth Borough Council
- Borough Council of King's Lynn and West Norfolk
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council

The preparation of HELAAAs has been underway following consultation on the approach taken and the adoption of a consistent Norfolk-wide methodology taking account any feedback arising from the consultation.

The methodology is considered to have been prepared in accordance with national guidance but would use an alternative size threshold for sites in certain rural locations and would seek to capture all potentially suitable sites within the Broads Authority area, where development potential is significantly constrained.

East of England Forecasting Model (EEFM)

The county, working with cross regional partners, has continued to support the East of England Forecasting Model (EEFM) which provides consistent economic forecasts annually for a range of including the New Anglia LEP, Norfolk, Greater Norwich and the individual districts. It therefore provides coverage for all the areas within and surrounding Greater Norwich. The principal purpose of the model is to help to inform strategic planning matters and set bench mark figures to monitor performance and as a robust evidence for fund bidding. The EEFM is overseen by a steering group of officers from upper tier authorities and the LEPs from the model area.

Norfolk Caravans and Houseboats Accommodation Needs Assessment Including for Gypsies, Travellers and Travelling Show people (2017)

In January 2017, five Norfolk local authorities (Broadland District Council, Great Yarmouth Borough Council, North Norfolk District Council, Norwich City Council and South Norfolk District Council), alongside the Broads Authority and Norfolk County Council, commissioned RRR Consultancy LTD to undertake a Caravans and Houseboats Needs Accommodation Assessment (ANA) for the period 2017-2036. The report was completed in October 2017.

Sustainability Appraisal

As part of the preparation of the Greater Norwich Local Plan (GNLP) an appraisal of the social, environmental and economic impact of the plan must be carried out. This appraisal is known as a Sustainability Appraisal (SA). The SA will also meet the requirements for Strategic Environmental Assessment (SEA) of the GNLP.

In order to identify the scope and level of detail of the information to be included in the SA a scoping report was produced for the GNLP, agreed by Broadland District Council, Norwich City Council and South Norfolk Council between January and March 2017.

An Interim SA Report of the emerging policy alternatives within the GNLP: Growth Options consultation document was completed and published as part of that consultation and a further iteration supports the consultation from January to March 2020.

Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy

Consultants have been commissioned to produce a county wide Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS). The expected output will include a review of strategically significant opportunities for the provision of new and enhanced Green Infrastructure; understand the current management measures for visitors to the European sites and evidence for recreational disturbance “hotspots” or particular concerns with locations proposed for housing growth; develop the mitigation necessary to avoid the significant adverse effects from “in-combination” impacts from residential development and identify a detailed programme of strategic mitigation measures which will be recommended to be funded by developer contributions from residential development schemes.

Greater Norwich Area Strategic Flood Risk Assessment (SFRA) (2017)

A consortium of Norfolk LPAs, comprising Broadland District Council, Great Yarmouth Borough Council, the Borough Council of King’s Lynn and West Norfolk, North Norfolk District Council, Norwich City Council, South Norfolk Council and the Broads Authority, commissioned a Level 1 SFRA to inform strategic planning decisions, the preparation of local plans and to inform development management decisions. Strategic Flood Risk Assessments (SFRAs) form part of the evidence base of the local plan and can be used to inform the Sustainability Appraisal. This report, produced by JBA Consulting, is available on the Greater Norwich Local Plan (GNLP) website [here](#).

The Greater Norwich authorities are in the process of commissioning as stage 2 SFRA to further assist in the process of site selection and to meet national planning requirements for allocating sites in areas with some flood risk. This is most likely to affect a limited number of sites in the city centre.

Greater Norwich: Town Centres & Retail Study and Town Centre Study

GVA Consultancy was commissioned to undertake an Employment, Retail and Town Centre Study on behalf of the three local authorities (Norwich City Council, Broadland District Council and South Norfolk Council) and Norfolk County Council that form the Greater Norwich area. This report was completed in 2017.

Greater Norwich Viability Assessment (draft)

The (draft) study firstly assesses the viability of types of sites submitted through the Call for Sites for the GNLP. Secondly, this study assesses whether policies in the local Plan will adversely affect the viability of development proposed through the GNLP. As proposed by the Harman Guidance on this issue, this is a high lever study which seeks to assess general development viability rather than site specific issues. An interim report was completed in 2019.

Health Protocol – An Engagement Protocol between Local Planning Authorities, Public Health Sector Organisations in Norfolk (December 2018)

The engagement protocol for planning health in Norfolk has come about in recognition of a need for greater collaboration between local planning authorities, health service organisations and public health agencies to plan for future growth and to promote health. It reflects a change in national planning policy and the need for health service organisations to deliver on the commitments within the 5 year forward view. The 2017 version has been updated to take into account of the emergence of the NHS Sustainability and Transformation Partnership (STP). Working with STP colleagues affords an opportunity for long term planning and growth to be considered alongside health infrastructure needs.

Greater Norwich Local Plan Habitats Regulation Assessment (HRA)

The Landscape Partnership was commissioned by the Greater Norwich Development Partnership to undertake a Habitat Regulations Assessment (HRA) of the GNLP. A screening report focussing on the assessment of twenty two strategic growth locations for the emerging plan, was completed in July 2017. Subsequently an Interim HRA was completed which assessed the emerging policy alternatives within the GNLP: Growth Options consultation document.. Further updates support the consultation from January to March 2020.

Neighbourhood Plans

The **Localism Act (2011)** brought a range of new powers to communities across the country to enable them to play a greater part in planning their future. One of these powers introduced was **Neighbourhood Plans** produced by parish and town councils²⁰ and subsequently adopted by the respective local planning authority. As a result, each respective authority supports parish and town councils as well as neighbourhood forums in the case of Norwich which are in the process of developing a Neighbourhood Plan.

To date a number of Neighbourhood Plans have been ‘made’ by Broadland District Council and South Norfolk Council in accordance with the Joint Core Strategy and in some instances, the Broads Authority Core Strategy as well as the National Planning Policy Framework. In addition, there are other Neighbourhood Plans currently in progress. Once made, a Neighbourhood Plan becomes part of the **Development Plan**.

²⁰ And in areas without parishes such as Norwich by appropriately constituted neighbourhood forums

Appendix D – Update on Sustainability Appraisal Baseline

Environment

Indicator	Target	Source		14/15	15/16	16/17	17/18	18/19	
Percentage of residents who travel to work: a) by private motor vehicle b) by public transport c) by foot or cycle d) work at home or mainly at home	decrease increase increase increase	census	Greater Norwich Broadland Norwich South Norfolk	See table in Objective 7					
% of river length assessed as good or better: a) overall status b) ecological status c) biological status d) general physio chem status e) chemical class	To increase the proportion of Broadland Rivers classed as 'good or better'	EA	Broadland Rivers	No data	a) 4% b)4% c)17% d)23% e)100%	a) 4% b)4% c)17% d)23% e)100%	a) 4% b)4% c)17% d)23% e)100%	a) 4% b)4% c)17% d)23% e)100%	
Development permissions granted contrary to Environment Agency advice on water quality grounds	None	LPA	Greater Norwich area	0	0	0	0	0	
			Broadland	0	0	0	0	0	
			Norwich	0	0	0	0	0	
			South Norfolk	0	0	0	0	0	
Number of designated Air Quality Management Areas (AQMAs)	Decrease	LPA	Greater Norwich area	1	1	1	1	1	
			Broadland	0	0	0	0	0	
			Norwich	1	1	1	1	1	
			South Norfolk	0	0	0	0	0	
Concentrations of selected air pollutants (micrograms per litre) a) annual average concentrations of Nitrogen Dioxide b) annual average Particulate Matter	Decrease	LPA	Broadland	a) No data b) No data	a) below 40µg/m3 b) below 40µg/m3	a) below 40µg/m3 b) below 40µg/m3	a) below 40µg/m3 b) below 40µg/m3	a) below 40µg/m3 a) below 40µg/m3	
			Norwich	a)15 b)15	a) 14 (LF); 66 (CM) b) 16 (LF); 21 (CM)		a) 13 (LF); 51 (CM) b) 16 (LF); 23 (CM)	a) 12 (LF); 54 (CM) b) 16 (LF); 27 (CM)	
			South Norfolk	a) 29 b) No data	a)18.6µg/m3 b) No data	a) 25.9 ug/m3 b) No data	a) 25 ug/m3 b) No data	a) 25 ug/m3 b) No data	
Net change in condition of SSSIs – percentage of SSSIs in favourable or unfavourable recovering condition	95% of SSSIs in 'favourable' or 'unfavourable recovering' condition	Natural England	Broadland	94%	94.00%	94.00%	94.00%		
			Norwich	100%	100%	100%	100%	No data	
			South Norfolk	93%	93%	93%	93%		
Norfolk Bio-diversity Action Plan progress: a) habitats actions in progress/completed b) species actions in progress/completed	Increase		Greater Norwich area Broadland Norwich South Norfolk	Options for other indicators are being explored with Norfolk Diversity Partnership					

Indicator	Target	Source	Districts	14/15	15/16	16/17	17/18	18/19
Net change in Local Sites in “Positive Conservation Management” – percentage of sites	To increase	Norfolk Biodiversity Information Service	Greater Norwich area	73%	No data	73%	73%	74%
			Broadland	75%	No data	75%	77%	76%
			Norwich	93%	No data	90%	90%	87%
			South Norfolk	70%	No data	71%	69%	71%
Number and percentage of a) listed buildings b) scheduled ancient monuments on Buildings at Risk Register	To decrease	LPA	Greater Norwich area		a)99 b)24			
			Broadland	a) 36 (3.7%) b) 22 (9%)	a) 30 (3%) b) 23 (13.6%)	a) 34(3.4%) b) 23(17.3%)	a) 35(3%) b) 23(17%)	a) 28(2%) b)23(17%)
			Norwich	a) 31 (2.1%) b) 2 (8.3%)	a) 28 (1.8%) b) 1 (4.1%)	a) 27 (1.0%) b) 1(4.1%)	a) 29 (2.8%) b) 2 (8%)	a) 25 (1.7%) b) 2 (8%)
			South Norfolk	a) 41 b) 0	a) 24 b) 0	a) 24 b) 0	a) 19 b) 0	a) 20 b) 5
Net change in number of Tree Preservation Orders (TPOs)	None to be lost as a result of development	LPA	Broadland	No data	No data	No data	No data	No data
			Norwich	5	9		No data	No data
			South Norfolk	No data	No data	No data	No data	No data
Total CO2 emissions per capita (million tonnes carbon equivalent)	To decrease	DECC	Broadland	6.6	6.2	6	5.5	No data
			Norwich	4.5	4.3	3.8	3.8	No data
			South Norfolk	7.2	6.6	6.3	6.2	No data
Renewable energy generating capacity permitted by type	Increase	LPA	Greater Norwich area	See table 3.9				
			Broadland					
			Norwich					
			South Norfolk					
Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence grounds.	Zero	LPA	Greater Norwich area		0	0	0	0
			Broadland	Data not yet released	0	0	0	0
			Norwich	0	0	0	0	0
			South Norfolk	0	0	1	0	0
Number of dwellings permitted within the high risk flood areas (Environment Agency Flood Zones 2 and 3)	None	LPA	Broadland	Data not yet released	0	0	0	0
			Norwich	No data	414	300	128	315
			South Norfolk	0	0	2	0	0
Daily domestic water use – per capita consumption	Decrease	LPA	Norwich and Broads Water Resource Zone	No data	No data	No data	No data	No data
Percentage of dwellings built on previously developed land	60%	LPA	Broadland	54%	44%	46%	33%	36%
			Norwich	88%	68%	93%	81%	86%
			South Norfolk	28%	27%	9%	7%	9%

Environment

Indicator	Target	Source	Districts	14/15	15/16	16/17	17/18	18/19
Percentage of new dwellings completed at: a) less than 30 per hectare b) 30-50 per hectare c) More than 50 per hectare	100% above 30 dwellings per hectare	LPA	Broadland	a)100% b)0% C)0%	a) 91% b) 9% c) 0%	a) 86% b)14% c) 0%	a) 66% b) 34% c) 0%	a) 54% b) 33% c) 13%
			Norwich	a)4% b)15% c)81%	a) 2% b) 15% c) 83%	a) 3% b) 18% c) 79%	a) 10% b) 24% c) 66%	a)10% b) 11% c) 79%
			South Norfolk	a) 53% b)45% C)2%	a)58% b)26% c)16%	a)74% b)17% c)8%	78% 13% 9%	a) 78% b) 15% c) 7%
Waste arising: a) kilograms of waste produced per head of population b) percentage change on previous year	Decrease	LPA	Broadland	a) 390 b) +4%	a) 383 b) - 0.99%	a)399.01 b)4.5%	a)378.84 b)4.64%	a)383.02 b)4.18%
			Norwich	a)326 b)0%	a) 308 b) -5.8%	a) 325.8 b) +5.5%	a) 322.43 b) -1%	a)386.5 b)-8.2%
			South Norfolk	a)364 b)4.6%	a)369 b)1.4%	a)378 b)2.4%	A)383 B)1.3	a) 374.71kg b) -2.2%
Recycling – percentage of household waste: a) recycled b) composted	Increase	LPA	Broadland	a) 25% b) 22%	a) 26% b) 25%	a) 24.88% b) 26.02%	a) 23.60% b) 26.34%	a) 21.45% b) 26.79
			Norwich	a) 29% b) 9%	a) 32% b) 9%	a) 27.3% b) 12.8%	a) 24.86% b) 12.7%	a) 22.9% b) 16.1%
			South Norfolk	a) 42% b) 18%	a) 44% b) 18%	a) 44% b) 19%	a) 42.34 b)18.4%	a) 22.15% b) 19.20%

Social

Indicator	Source	Target		14/15	15/16	16/17	17/18	18/19
Income deprivation affecting children – percentage of children living in income deprived families – average LSOA score	DCLG	Decrease	Greater Norwich area	No data	No data	No data	No data	0.133
			Broadland					0.084
			Norwich					0.218
			South Norfolk					0.098
	DCLG	Decrease	Greater Norwich area	0.12	No data	No data	No data	0.105
			Broadland	0.08			0.071	
			Norwich	0.19			0.165	
			South Norfolk	0.09			0.079	
Index of Multiple Deprivation – average LSOA score	DCLG	Decrease	Greater Norwich area	17.8	No data	No data	No data	17.8
			Broadland	11.04				11.77
			Norwich	29.07				28.08
			South Norfolk	13.24				13.64
Total benefit claimants - percentage of working age population claiming benefits	Working age client group Key benefit claimant	Decrease	Broadland	8.4	8.10%	Data discontinued	Data discontinued	Data discontinued
			Norwich	14.4	13.20%			
			South Norfolk	8.4	7.80%			
Percentage of working age population receiving ESA and incapacity benefit	Working age client group Key benefit claimant	Decrease	Broadland	4.5	4.60%	Data discontinued	Data discontinued	Data discontinued
			Norwich	7.7	7.80%			
			South Norfolk	4.3	4.20%			
Life expectancy of residents (at birth) a) males b) females	ONS	Increase	Broadland	Data not yet released	Data not yet released	a)81.1	Data not yet released	Data not yet released
			Norwich			b)84.5		
			South Norfolk			a)78.3 b)82.8		
						a)81.3 b)84.8		
Workforce qualifications – percentage of working age population with qualifications at NVQ level 4 or above	Annual Population Survey	Increase	Greater Norwich area	33.80%	34.00%	36.80%	37.10%	38.40%
			Broadland	29.30%	31.40%	28.60%	30.50%	39.70%
			Norwich	35.90%	39.30%	38.80%	36.80%	38.50%
			South Norfolk	35.70%	30.80%	42.00%	43.70%	36.90%

Indicator	Source	Target		14/15	15/16	16/17	17/18	18/19
Affordable housing stock provision: a) percentage of housing stock that is affordable b) Total affordable housing units completed in past year c) Percentage of past year's dwellings that are affordable	LPA	Increase	Broadland	a) 9.9% b) 98 c) 24%	a) 10.02% b) 107 c) 18%	a)10.3% b)237 c)36.8%	a)10.5% b)177 c)26.1%	a)10.7% b)195 c)30.4%
			Norwich	a)33% b)50 c)20%	a) Data not available b) 25 c) 6.8%	a)Data not available b)44 c)10%	a) Data not available b) 56 c)23.6%	a) data not available b) 137 c) 14.8
			South Norfolk	a)13% b)95% C)9%	a) 13% b) 93 c) 12.2%	a) 13% b) 175 c) 15.1%	a) 13% b) 298 c) 26.6%	a) 13.14% b) 392 c) 32.34%
Total dwellings with Category 1 hazards	LPA	Decrease	Broadland	No data	No data	No data	No data	No data
			Norwich	No data	10246	10246	10246	No data
			South Norfolk	16737	16737	16737	16737	16737
Incidences of total crime committed: a) domestic burglaries b) violent offences against the person (with/without injury) c) offences against a vehicle	Norfolk Constabulary	Decrease	Greater Norwich area	A-595 B- 5457 C-964	A-666 B- 6554 C-1137	A-667 B-7373 C-1126	A-1243 B-7135 C-1299	A-1112 B-8211 C-1347
			Broadland	A - 112 B- 1218 C - 185	A - 104 B- 1425 C - 216	A-95 B-1631 C-168	A-232 B-1514 C-230	A-219 B-1652 C-266
			Norwich	A-322 B- 3188 C-538	A-410 B- 3803 C-670	A-408 B-4328 C-675	A-686 B-4340 C-757	A-629 B-5063 C-785
			South Norfolk	A-161 B-1051 c-241	A-152 B-1326 c-251	A-144 B-1414 C-283	A-325 B-1281 C-312	A-264 B-1496 C-296
Percentage of the economically active population who are unemployed	Annual Population Survey	Decrease	Greater Norwich area	4.70%	3.00%	3.50%	4.40%	4.40%
			Broadland	3.70%	2.30%	2.80%	2.40%	5.30%
			Norwich	4.10%	4.00%	5.00%	7.80%	4.60%
			South Norfolk	6.40%	2.50%	2.40%	2.50%	3.50%
Percentage of people claiming Job Seekers Allowance (JSA) who have been doing so for: a) over 1 year; b) over 2 years	Claimant Count	Decrease	Greater Norwich area	a) 0.3% b) 0.2%	a)0.3% b)0.2%	a)0.2% b)0.1%	a)0.2% b)0.1%	a)0.2% b)0.1%
			Broadland	a) 0.2% b) 0.1%	a)0.1% b)0.1%	a) 0.1% b) 0.1%	a)0.1% b)0.1%	a)0.1% b)0.1%
			Norwich	a) 0.6% b) 0.4%	a)0.4% b)0.3%	a)0.3% b)0.2%	a)0.3% b)0.2%	a)0.4% b)0.2%
			South Norfolk	a) 0.2% b) 0.1%	a)0.2% b)0.1%	a)0.1% b)0.1%	a)0.1% b)0.1%	a)0.1% b)0.1%
Unfit housing – percentage of overall housing stock not meeting 'Decent Homes Standard'	LPA	Decrease	Broadland	No data	No data	No data	No data	No data
			Norwich	No data	No data	No data	No data	No data
			South Norfolk	No data	No data	No data	No data	No data

Indicator	Source	Target		14/15	15/16	16/17	17/18	18/19
Percentage of new public housing stock built to the standard of the Code for Sustainable Homes	LPA	All new affordable homes should be built to C4SH level 4	Broadland	No data No data	No data No data	No data No data	No data No data	No data
			Norwich	76% - 3 24% -4	76% - 3 24% -4	92% - 3 24% -4	No data No data	No data No data
			South Norfolk	No data	No data	No data	No data	No data
Percentage of residents who travel to work: a) by private motor vehicle b) by public transport c) by foot or cycle d) work at home or mainly at home	Census	decrease	Greater Norwich	a) 67% b) 7% c) 18% d) 6%				
		increase	Broadland	a) 75% b) 6% c) 10% d) 6%				
		increase	Norwich	a) 52% b) 9% c) 33% d) 4%				
		increase	South Norfolk	a) 73% b) 6% c) 10% d) 7%				

Economy

Indicator	Source	Target		14/15	15/16	16/17	17/18	18/19
Percentage change in total number of active enterprises	Business Demography	Increase	Greater Norwich area	3.40%	6.70%	5.80%	Data not yet released	Data not yet released
			Broadland	1.40%	11.60%	4.00%		
			Norwich	5.50%	3.40%	9.90%		
			South Norfolk	3.00%	5.60%	3.40%		
Median a) hourly; b) weekly; c) annual pay for full-time employees	ASHE	Increase	Broadland	a) £12.37	a) £12.42	a) £13.03	a)12.81	a)14.49
				b) £512	b) £491.00	b)496	b)481.70	b)527.6
				c) £ 25,697	c)26,531	c)27,190	c)27,418	c)30,396
			Norwich	a) £ 10.95	a) £11.41	a)11.77	a)12.41	a)12.83
				b) £ 432	b) £447.50	b)433.60	b)463.60	b)481.50
				c) £ 22,377	c)23,817	c)26,107	c)no data	c)26,813
South Norfolk	a) £ 13.09	a) £12.99	a)13.94	a)13.17	a)15.59			
	b) £ 525	b)499.6	b)520.60	b)499.10	b)574.00			
	c) £ 26,817	c)29,386	c)30,135	c)27, 292	c)30,396			
Percentage of residents who travel to work: a) by private motor vehicle b) by public transport c) by foot or cycle d) work at home or mainly at home	Census	decrease	Greater Norwich	a) 67% b) 7% c) 18% d) 6%				
		increase	Broadland	a) 75% b) 6% c) 10% d) 6%				
		increase	Norwich	a) 52% b) 9% c) 33% d) 4%				
		increase	South Norfolk	a) 73% b) 6% c) 10% d) 7%				
Percentage of people employed who travel: c) 5 to 10km d) 10 to 20km e) More than 20km	Census	Decrease in distance travelled	Greater Norwich area	a) 21% b) 22% c) 18% d) 15% e) 11%				
			Broadland	a) 14% b) 21% c) 24% d) 17% e) 9%				
			Norwich	a) 34% b) 33% c) 9% d) 5% e) 9%				
			South Norfolk	a) 15% b) 11% c) 21% d) 22% e) 14%				
Amount of various employment developed on previously developed land or conversions	LPA	60%	Broadland	70%	75.30%	70.80%	61.00%	60.78%
			Norwich	100%	100%	77%	100%	100%
			South Norfolk	No data	51%	12%	88%	78%
Unemployment benefit receipt: percentage of population in receipt of Job Seekers Allowance (JSA); claimants of JSA by age range: a) 16-24 years old b) 25-49 years old c) 50+ years old	Claimant Count	Decrease	Greater Norwich area	a)1.9%	a)0.9%	a)0.7%	No data	No data
				b)1.5%	b)1.1%	b)0.9%		
				c)1.0%	c)0.9%	c)0.8%		
			Broadland	a) 1.4%	a)0.8%	a)0.6%		
				b) 0.8%	b)0.6%	b)0.6%		
				c) 0.5%	c)0.5%	c)0.5%		
			Norwich	a)2.3%	a)1.1%	a)0.7%		
				b)2.4%	b)1.7%	b)1.3%		
				c)2.1%	c)1.9%	c)1.6%		
			South Norfolk	a)1.6%	a)0.7%	a)0.5%		
b)1.0%	b)0.7%	b)0.5%						
c)0.7%	c)0.6%	c)0.6%						

Appendix E - Broadland District Council Annual Monitoring Report 2018-19

Executive Summary

This report outlines the progress against targets set out in the monitoring framework of the adopted Broadland Local Plans: Development Management DPD; Site Allocations DPD and Growth Triangle Area Action Plan.

This report relates to the Greater Norwich Development Plan Document Annual Monitoring Report 2018/19 (GNDP AMR), and has been provided as an appendix to the GNDP AMR.

This report should be read in conjunction with the

- GNDP AMR 2018/19;
- Five Year Housing Land Supply Statement for Broadland, Norwich and South Norfolk;
- Sustainability Appraisal Scoping Report for the Greater Norwich Joint Core Strategy 2011 (2014).

Introduction

The monitoring of development plans, as expressed in *the 2012 Town and Country Planning regulations* as part of the *Localism Act* adopted in 2011, is important in ascertaining whether a plan is achieving its overall aims, objectives and targets; and identify whether revisions are required.

The monitoring of the Local Plan will enable the relevance of local policies to be assessed, and ensure that as plans are reviewed, policies which need adjustment can be identified. Previous monitoring reports monitored the Broadland District Local Plan Replacement (2006) which has now been completely superseded and so will no longer be monitored.

The Annual Monitoring Report (AMR) published by the Greater Norwich Development Partnership (GNDP), to which this report is appended, updates the monitoring framework of the Joint Core Strategy (2011) (2014) since 2008 the base date of the plan, and provides a useful indication on how the GNDP area is currently performing in terms of its overall objectives.

The GNDP is Broadland District Council, Norwich City Council and South Norfolk Council working together with Norfolk County Council and the Broads Authority, to plan for and deliver growth in the Greater Norwich area. The Joint Core Strategy (JCS) for the three component districts (excluding the Broads Authority) sets out the long-term vision and objectives for the area. The JCS was adopted by Broadland, Norwich and South Norfolk in March 2011. However following a legal challenge part of the JCS, relating to the Broadland part of the Norwich Policy Area was remitted. The necessary work to address the High Court Order was undertaken in 2012, resulting in the resubmission of the part JCS to the Secretary of State for independent examination in early 2013. The independent examination of the part JCS was carried out during May and July 2013. The inspectors report was published 13 November 2013, finding that, subject to a number of main modifications, the plan was sound. The plan was adopted in January 2014. For the sake of brevity, this report directs the reader to the Greater Norwich Development Partnership Annual Monitoring Report where relevant.

This Annual Monitoring Report produced by Broadland District Council covers the period from 1 April 2018 to 31 March 2019; where appropriate, more up to date information has been included.

This report is based on the objectives and targets set out in the Broadland District Development Management DPD, Site Allocations DPD, and Growth Triangle Area Action Plan together with the Joint Core Strategy, which make up Broadland District Council's local plan. The monitoring

targets apply to the objectives and not to individual policies. The policies are seen as a tool used in achieving the plans' objectives.

Overview of Broadland District

Area and Population

Following the first release of the 2011 Census data, the population of Broadland was estimated to be 124,700. Recent data from 2018 estimates the population to be 129,464. This equates to a 3.82% increase in population in the period between 2011 and 2018.

The land area of Broadland district is 55,240 hectares, and is the fifth largest district in Norfolk. Therefore, the population density is 2.3 persons per hectare.

The 2011 census shows Broadland population has a relatively elderly age profile. Compared with England and Wales, Broadland has higher proportions of people aged 45 and over, and lower proportions in the younger age groups, particularly 20-29 year olds.

As of 2016, around 49% of the district's population live in the urban fringe of Norwich. 5% of the population live in Aylsham. Of the remaining parishes around 44% percent live in parishes of over 300 people and 2% in parishes with less than 300 people.

According to the Rural and Urban Area Classification 2011, Broadland is classified as Code 3 - Urban with Significant Rural (rural including hub towns 26-49%) with 48.5% of the population living in rural areas including hub towns.

Source: Norfolk Insight

1. Local Development Scheme

- 1.1. The current adopted LDS is available on the Broadland District Council Website and is updated as necessary to reflect any changes to timetables. Currently it sets out the timetable for the Greater Norwich Local Plan which is being produced by Broadland, Norwich and South Norfolk councils.

Local Plan Work

- 1.2. Work is ongoing on the proposed Greater Norwich Local Plan that is being produced by Broadland, Norwich and South Norfolk councils. The current proposed timetable is for a draft plan to be consulted on in January – March 2020, with a view to the publication of the proposed submission version in January – February 2021 followed by submission to the Secretary of State in June 2021, a public examination in late 2021 and adoption of the local plan around August / September 2022.
- 1.3. The Greater Norwich Local Plan will contain strategic planning policies and when adopted will replace the existing Joint Core Strategy. It will also contain policies allocating land to meet the identified needs for development. The process of identifying these allocations includes the consideration of the allocations already included in existing "site allocation" local plans. Many of these existing allocations have already been developed and others have planning permission and may be in the course of being developed. The Greater Norwich Local Plan will consider these existing allocations and take forward the undeveloped ones as allocations in the new local plan if appropriate. Also, very large-scale development is identified in specific existing local plans known as "area action plans"; these being for the major developments in the Growth Triangle in Broadland, and at Long Stratton and Wymondham in South Norfolk. These major development areas are progressing but are still in the early stages of a process that will

take several years to be completed. The area action plans will continue to guide this process.

- 1.4. The other type of existing local plans is those that contain specific “development management” policies. These will need to be reviewed and updated as necessary in the future.
- 1.5. Under the National Planning Policy Framework and Regulations, there is a requirement for local plans to be reviewed at least every five years. The updating of the Joint Core Strategy is already underway through the Greater Norwich Local Plan, as are the site allocation local plans. The remaining local plans (the area action plans and development management policies) will be five years old in 2020/2021, and so reviews will be timetabled for these in the coming year.
- 1.6. Amendments will need to be made, as required, to the Council’s Local Development Scheme to take account of the above matters.

2. Adopted Local Plans

Joint Core Strategy

- 2.1. The Joint Core Strategy for Broadland Norwich and South Norfolk is a strategic planning document prepared by the three districts. The JCS sets out the long-term vision, objectives and spatial strategy for new housing, employment and infrastructure in the area.
- 2.2. The plan was adopted in 2008 and part in 2011, as explained in the Introduction above. Monitoring for this is included in the GNDP Annual Monitoring Report.

Development Management DPD

- 2.3. The Development Management Policies DPD includes both general and detailed local policies used in the determination of planning applications.
- 2.4. The plan was adopted on 3 August 2015.

Site Allocations DPD

- 2.5. The Site Allocations DPD identifies, or “allocates” areas of land for specific types of development, such as housing, employment or community facilities. It also defines “settlement limits” for places. These settlement limits identify, in broad terms, where development will typically be deemed acceptable.
- 2.6. The plan was adopted on 3 May 2016

Growth Triangle Area Action Plan

- 2.7. Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Area Action Plan (AAP) sets out the council’s policies to manage the coordinated delivery of sustainable development in north-east Norwich.
- 2.8. The plan was adopted 04 July 2016.

3. Community Infrastructure Levy (CIL)

- 3.1. The Community Infrastructure Levy (CIL) is a non-negotiable levy placed on most built development.
- 3.2. The purpose of CIL is to fund infrastructure needed to support development in the area. The Local Investment Plan and Programme (LIPP) is the document that sets out key investment packages and projects including infrastructure for Broadland, Norwich and South Norfolk.
- 3.3. Broadland District Council resolved to adopt CIL at its meeting on 9 May 2013 with implementation on 1 July 2013.
- 3.4. The Town and Country Planning Regulations 2012 state that reports produced in relation to regulation 62 of The Community Infrastructure Levy Regulations 2010, will need to be incorporated into the Local authorities Annual Monitoring Report. As CIL is co-ordinated across the greater Norwich area, this information is contained in the main section of the GNDP Annual Monitoring Report.

4. Neighbourhood Development Plans

- 4.1. During 2018/19, there were nine Neighbourhood Plans being developed in Broadland. The nine communities developing Plans were Aylsham, Buxton with Lamas, Guestwick, Horsford, Horstead with Stanninghall, Spixworth, Taverham, Thorpe St. Andrew and Wroxham.
- 4.2. The District Council has been supporting each of these projects in a number of ways, including provision of day-to-day advice and guidance, technical assistance, funding, attendance at meetings etc. Some of the parish/town councils have also appointed external consultants to assist them in the process.
- 4.3. Two of the nine communities (Buxton w. Lamas; Guestwick) designated Neighbourhood Areas within this period, for the purpose of their Neighbourhood Plan. In each case, the Neighbourhood Area proposed or designated has followed the parish boundary.
- 4.4. Within this period, two of the nine Neighbourhood Plans (Wroxham and Aylsham) were submitted to the local planning authority, following the Reg. 14 pre-submission consultation
- 4.5. During 2018/2019, there were two further Neighbourhood Plans 'made' (or adopted) in the District (Horsford; Wroxham), taking the total number to fourteen. These Plans all form part of the statutory Development Plan and they were made on the following dates:

Acle	- 17th February 2015
Blofield	- 26th July 2016
Brundall	- 22nd March 2016
Drayton	- 26th July 2016
Great & Little Plumstead	- 16th July 2015
Hellesdon	- 19th December 2017
Horsford	- 12 th July 2018
Old Catton	- 26th July 2016
Rackheath	- 20th July 2017

Salhouse	- 20th July 2017
Sprowston	- 8th May 2014
Strumpshaw	- 10th July 2014
Wroxham	- 28 th March 2019

- 4.6. The Acle, Brundall, Strumpshaw and Wroxham Neighbourhood Plans have also been made by the Broads Authority.

5. Monitoring Framework

Local planning Authorities must publish information that shows how the implementation of policies in the Local Plan is progressing, and the steps taken to secure delivery of any policies not currently being implemented. This will be done through ongoing monitoring, and the results will be published yearly in the GNDP Annual Monitoring Report.

The following tables are the monitoring frameworks giving a progress update on policies within Broadland's current local plan. The frameworks are:

- a) Development Management DPD (DM DMP) - The Development Management DPD aims to further the objectives set out in the National Planning Policy Framework (NPPF) and the Joint Core Strategy (Broadland, Norwich and South Norfolk).
- b) The Site Allocations DPD (SA DPD) - This identifies areas of land in Broadland for specific types of development, for example housing, employment, community facilities, retail, recreation etc.
- c) The Growth Triangle Area Action Plan (GT AAP) - This plan specifically applies to the areas of Rackheath, Old Catton, Sprowston, Thorpe St Andrew and other parishes which are not covered by the Site Allocations DPD. The Joint Core Strategy identified these areas for major urban development concentrating on growth that can support local services such as transport links, secondary education, healthcare, and green infrastructure.

a. Development Management DPD Monitoring Framework

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
GC1: Presumption in favour of sustainable development	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12	ENV1, ENV2, ENV3, ENV4, ENV5, ENV6, ENV7, ENV8, ENV9, SOC1, SOC2, SOC3, SOC4, SOC5, SOC6, SOC7, SOC8, EC1, EC2, EC3, EC4	No specific indicator	Not applicable	See indicators for JCS objectives 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 in the main section of the GNDP Annual Monitoring Report.
GC2: Location of new development	1, 2, 3	ENV1, ENV9, SOC4, SOC7	Number of planning permissions granted contrary to GC2	None	<p>Seven new residential developments have been granted contrary to policy GC2. Five sites are within the NPA and applications refer to the acknowledged shortfall in 5 year housing land supply within this policy area. Therefore, they contribute to increasing the NPA land supply.</p> <p>Two of the sites have been identified within a Neighbourhood Plan as a possible housing site.</p> <p>All of the sites are adjacent to existing residential developments.</p>
GC3: Conversion of buildings outside settlement limits	2, 3, 4	ENV5, ENV9, SOC 7, EC1, EC2, EC4	No specific indicator	Not applicable	See indicators for JCS objectives 2, 3, 4 in the main section of the GNDP Annual Monitoring Report.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
GC4: Design	1, 7, 8, 9, 10, 11	ENV1, ENV5, ENV6, ENV9, SOC5	No specific indicator		See indicators for JCS objectives 1, 7, 8, 9, 10, 11 in the main section of the GNDP Annual Monitoring Report.
GC5: Renewable energy	1	ENV6	Renewable energy capacity installed by type per annum	Year on year increase	This indicator is monitored as part of the JCS objectives. See Objective 1 in the GNDP AMR.
EN1: Biodiversity and Habitats	9	ENV2, ENV4, ENV5	Number of planning applications granted contrary to the advice of Natural England on the grounds of recreational impact on N2K sites	None	None within monitoring year.
EN2: Landscape	8, 9	ENV2, ENV4, ENV5, ENV9	No specific indicator	N/A	See indicators for JCS objectives 8, 9 in the main section of the GNDP Annual Monitoring Report.
EN3: Green infrastructure	8, 9	ENV2, ENV4, ENV5, ENV9	No specific indicator	N/A	See indicators for JCS objectives 8, 9 in the main section of the GNDP Annual Monitoring Report. See also indicator for recreational open space (RL1).
EN4: Pollution	1, 7, 9	ENV1, ENV2, ENV3, ENV4, ENV5, ENV6, ENV7, ENV9	Number of permissions granted contrary to the advice of the Environment Agency (on pollution grounds)	None	None within monitoring year.
H1: Dwellings connected with rural enterprises	2, 3	ENV1, SOC6, SOC8, EC1, EC2, EC3, EC4	No specific indicator	N/A	See indicators for JCS objectives 2, 3 in the main section of the GNDP Annual Monitoring Report.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
H2: Removal of occupancy conditions	2	ENV9, SOC4, SOC7	No specific indicator	N/A	See indicators for JCS objective 2 in the main section of the GNDP Annual Monitoring Report.
H3: Replacement dwellings outside settlement limits	2, 9	ENV9, SOC4, SOC7	Number of units granted planning permission for replacement dwellings outside of settlement limits	No target	In the monitoring year one site outside of settlement limits was granted planning permission for a replacement dwelling. The unit was considered acceptable as the use as a dwelling has not been abandoned Consequently, the principle of the policy has not been infringed and continues to be an appropriate approach.
H4: Change of use of a dwelling	2	ENV1, SOC6, SOC8, EC1, EC2, EC3, EC4	Number of dwellings lost through change of use.	No target	In the monitoring one dwelling was lost through change of use. The change of use from C3 to C2 was considered acceptable as it would provide residential care for eight residents Consequently, the principle of the policy has not been infringed and continues to be an appropriate approach.
H5: Residential institutions	2	SOC1, SOC2	No specific indicator	N/A	See indicators for JCS objective 2 in the main section of the GNDP Annual Monitoring Report.
H6: Sites for Gypsies and Travellers	2	ENV1, SOC1, SOC3, SOC8	No. of net new pitches permitted	Maintenance of at least a 5 year supply	This indicator is monitored as part of the JCS objectives. See Objective 2 in the GNDP AMR

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
E1: Existing strategic employment sites	3	EC1, EC2, EC3, EC4	Amount of floor space (m ²) granted planning permission for non-employment uses on strategic employment sites	None	One unit comprising of 1500sqm of floor space in total was granted permission for non-employment use. The unit was small and changed to D2 use. The decision notice included a condition for the premises to return to employment use upon cessation of the business.
E2: Retention of employment sites	3	EC1, EC2, EC3, EC4	No. of permissions granted contrary to Policy E2	None	Nine permissions were granted contrary to policy E2. All the sites were supported by the Economic Development department as they will increase the provision of local services and support small business. Two sites included a condition for the premises to return to employment use upon cessation of the businesses.
E3: Tourist accommodation	3, 8	EC1, EC2, EC3, EC4	No. of permissions granted contrary to Policy E3	None	Three permissions were granted contrary to policy E3. All applications presented a viable proposal and were associated with an established enterprise.
R1: District, Commercial and Local centres		ENV9, SOC8, EC1, EC2, EC3, EC4,	% of ground floor A1 units in the defined district and commercial centres	Minimum of 50% of number of ground floor non-residential units in A1 use	In the monitoring year, two permissions were granted which resulted in the loss of A1 use. In both these approvals the Economic Development department has stated that the proposed uses would support the viability of the town centre and increase the footfall to nearby businesses, which could be beneficial to the local economy.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
R2: Sprowston and Sweetbriar retail parks		ENV9, SOC8, EC1, EC2, EC3, EC4,	No. of permissions granted contrary to Policy R2	None	None within the monitoring year.
RL1: Provision of formal recreational space	8, 9, 11	SOC1, SOC2, SOC8	Net gain of recreational open space delivered through developments (Ha)	Net Increase	There has been no net increase or decrease in formal recreational space within the monitoring year.
TS1: Protection of land for transport improvements	7	ENV1, ENV3, ENV6, SOC8	No specific indicator	N/A	See indicators for JCS objective7 in the main section of the GNDP Annual Monitoring Report.
TS2: Travel Plans and Transport Assessments	1, 7	ENV1, ENV3, ENV6, SOC8	No specific indicator	N/A	See indicators for JCS objectives 1, 7 in the main section of the GNDP Annual Monitoring Report.
TS3: Highway safety	7	ENV1, ENV3, ENV6, SOC8	No. of permissions granted contrary to Policy TS3	None	Applications proposed for approval, contrary to Highway Authority comments, are referred to the planning committee for determination.
TS4: Parking guidelines	7	ENV1, ENV3, ENV6, SOC8	No specific indicator	N/A	See indicators for JCS objective7 in the main section of the GNDP Annual Monitoring Report.
TS5: Airport development	3, 7	ENV1, ENV3, ENV6, SOC8, EC1	No specific indicator	N/A	See indicators for JCS objectives 3, 7 in the main section of the GNDP Annual Monitoring Report.
TS6: Public safety zones	7	ENV1, ENV3, ENV6, SOC8	No. of permissions granted contrary to Policy TS6	None	None within monitoring year.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
CSU1: Additional community facilities	6, 8	SOC1, SOC2, SOC8	No. of permissions granted in accordance with Policy CSU1	Net increase	In the monitoring year there have been 15 permissions granted relating to community facilities. Of these, five were for new community facilities. A further five were for increasing the floorspace of existing facilities. Overall, these approvals gave a net increase on the previous amenity.
CSU2: Loss of community facilities or local services	6, 8	SOC1, SOC2, SOC8	No specific indicator	N/A	See indicators for JCS objectives 6, 8 in the main section of the GNDP Annual Monitoring Report. See also indicator for Additional community facilities (CSU1).
CSU3: Provision of community facilities or local services within large-scale residential development	6, 8	SOC1, SOC2, SOC8	No specific indicator	N/A	See indicators for JCS objectives 6, 8 in the main section of the GNDP Annual Monitoring Report. See also indicator for Additional community facilities (CSU1).
CSU4: Provision of waste collection and recycling facilities within major development	6, 8	ENV9, SOC1, SOC8	No. of waste collection and recycling facilities approved	No target	No waste collection or recycling facilities were approved in the monitoring period. Kerbside bin collection points and bin stores in residential developments are generally a requirement of obtaining approval. Policy to continue to be monitored as major developments progress.
CSU5: Surface water drainage	1	ENV2, ENV7	No. of planning permissions granted contrary to the advice of the Environment Agency or Lead Local Flood Authority	None	See indicators for JCS objective 1 in the main section of the GNDP Annual Monitoring Report.

b. Site Allocations DPD Monitoring Framework

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
ACL 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2020	Outline application 20172189 for 140 dwellings was granted in May 2018.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.
ACL 2	1, 2, 3, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC6, SOC7, SOC8, EC1, EC2, EC3, EC4	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2018	Outline planning permission 20141392 for mixed use development granted June 2015. Reserved matters 20180941 for 30 dwellings was granted in October 2018
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.
ACL 3	1, 3, 7	EN1, EN9, SO6, SOC8, EC1, EC2, EC3, EC4	Type of planning application, decision & achievement of employment uses providing jobs.	To commence by Mar 2021	No activity during this monitoring year.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
ACL 4	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2018	Hybrid planning application 20140787 for 24 open market dwellings (outline) and 12 affordable dwellings (full) granted May 2015. Reserved matters 20152044 for 24 market dwellings granted Mar 2016. Both phases are expected to be completed by Oct 2019
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.
AYL 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2016 To complete by Mar 2021	Reserved matters application 20130680 granted Oct 2013. Site was completed Mar 2019.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.
AYL 2	1, 2, 4, 6, 7, 9, 10, 11, 12	ENV1, ENV6, ENV7, ENV8, ENV9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2016 To complete by Mar 2022	Reserved matters application 20140298 granted May 2014. 85% of the site has been completed.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
AYL 3	1, 3, 7	ENV1, ENV9, SO6, SOC8, EC1, EC2, EC3, EC4	Type of planning application, decision & achievement of employment uses providing jobs.	To commence by Mar 2021	No activity during this monitoring year.
AYL 4	1,3,7	ENV1, ENV9, SO6, SOC8, EC1, EC2, EC3, EC4	Type of planning application, decision & achievement of employment uses providing jobs.	To commence by Mar 2021	No activity during this monitoring year. The north-west corner of the site has been developed under reserved matters application 20111439 for B8 storage warehouse.
BLO 1	1, 2, 3, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, ENV, SOC1, SOC2, SOC4, SOC5, SOC6, SOC7, SOC8, EC1, EC2, EC3, EC4	Type of planning application, decision & achievement of dwelling mix & achievement of employment uses providing jobs.	To commence by Mar 2017 To complete by Mar 2020	Reserved matters 20140757 has been superseded by Hybrid application 20160497, granted Nov 2016, consisting of full approval for 1500m2 B1 use and outline for 1000m2 B1 use. Full approval 20140758 for supermarket and restaurant was granted July 2014. This permission lapsed July 2017. Outline planning application 20160488 for 175 dwellings granted June 2017. Reserved matters 20172131 for a reduction in dwellings to 163 was approved in October 2018. Works have commenced on the site.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
BLO 2	1, 2, 4, 6, 7, 9, 10, 11, 12	ENV1, ENV6, ENV7, ENV8, ENV9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2015 To complete by Mar 2016	Full approval 20141710 granted for 20 open market and 10 affordable dwellings. 80% of the site has been completed.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.
BLO 3	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2015 To complete by Mar 2017	Reserved matters 20130296 granted for 64 dwellings granted Jan 2014. Site was completed in Mar 2019.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.
BLO 4	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2020	Reserved matters application 20150700 for 75 dwellings granted Oct 2015. Full approval 20171053 to replace 4 dwellings with 8 dwellings was approved shortly after the monitoring year. 75% of Phase I has been completed. Reserved matters 20150794 granted Oct 2015 to expand site by 30 dwellings. 33% of Phase II has been completed.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
BLO 5	1,2,4,6,7,9,10,11,12	ENV1, ENV6, ENV7, ENV8, ENV9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2018	Outline permission 20140968 granted for 36 dwellings Feb 2015. Reserved matters application 20162199 granted Oct 2017.
			Level of Open space provided in relation to Policy EN3 of DM DPD		Provision within the permission in accordance with policy.
BRU 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2015 To complete by Mar 2018	Site was completed in Mar 2017.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.
BRU 2	8, 9	ENV4, SOC2, SOC5, SOC7, SOC8	Planning permission & maintained recreational uses	N/A	Site has been incorporated into outline application 20161483 for 155 dwellings, a supermarket and open space. The application was approved in March 2018.
BRU 3	8, 9	ENV4, SOC2, SOC5, SOC7, SOC8	Planning permission & maintained recreational uses	N/A	Site has been incorporated into outline application 20171386 for 170 dwellings and community recreational facilities. The application was registered Aug 2017.
BUX 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4,	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2018	Outline planning permission 20150082 for 21 dwellings granted Oct 2016.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
		SOC5, SOC7, SOC8, EC1	Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.
CAW 1	8, 9	EN4, SOC2, SOC5, SOC7, SOC8	N/A	N/A	Allocated for extension to burial ground.
CAW 2	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2018	There is a current call for sites proposal for an enlarged area, which includes this site, under the Greater Norwich Local Plan.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	
COL 1	1, 2, 4, 6, 7, 9, 10, 11, 12	ENV1, ENV6, ENV7, ENV8, ENV9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2018	Outline application 20170075 for 30 dwellings was granted Nov 2017.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.
COL 2	1, 2, 4, 6, 7, 9, 10, 11, 12	ENV1, ENV6, ENV7, ENV8, ENV9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2018	No progress during this monitoring year.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
DRA 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2021	Outline planning permission 2013088 for 200 dwellings granted Aug 2014. Revised outline application 20161066 for 250 dwellings was registered Jun 2016. There is a Resolution to Grant permission subject to S106 negotiation.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.
DRA 2	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1, EC2, EC3, EC4	Type of planning application, decision & achievement of dwelling mix, job creation and or retail provision.	To commence by Mar 2017 To complete by Mar 2018	No activity during this monitoring year.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	
FOU 1	1, 2, 4, 6, 7, 9, 10, 11, 12	ENV1, ENV6, ENV7, ENV8, ENV9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2015 To complete by Mar 2016	Site was completed in Mar 2015.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Permission was under previous Local Plan policy.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
FOU 2	1, 3, 7	ENV1, ENV9, SO6, SOC8, EC1, EC2, EC3, EC4	Type of planning application, decision & achievement of employment uses providing jobs.	To commence by Mar 2021	The western end of the site has been developed. No activity on rest of site during this monitoring year.
FRE 1	1, 2, 4, 6, 7, 9, 10, 11, 12	ENV1, ENV6, ENV7, ENV8, ENV9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Apr 2016 To complete by Mar 2017	Full planning application 20181845 for 9 dwellings was submitted Nov 2018.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	
GLP 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To complete by Mar 2015	Site was completed in March 2015.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Permission was under previous Local Plan policy.
GWI 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2015 To complete by Mar 2016	Site was completed in Mar 2015.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Permission was under previous Local Plan policy.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
HEL 1	1, 2, 3, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC6, SOC7, SOC8, EC1, EC2, EC3, EC4	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2018 To complete by Mar 2021	No progress during this monitoring year.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	
HEL 2	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2018 To complete by Mar 2025	Hybrid application 20151770 granted Dec 2016. This includes outline approval for up to 1000 dwellings; 108 of these had reserved matters granted. Full planning 20171514 granted Jun 2018 reduces the 108 dwellings to 95. Work has commenced on the site.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.
HEL 3	8, 9	EN4, SOC2, SOC5, SOC7, SOC8	Planning permission & cemetery use.	N/A	Allocated for extension to burial ground.
HEL 4	8, 9	EN4, SOC2, SOC5, SOC7, SOC8	Planning permission & maintained recreational uses	N/A	There is a current call for sites proposal, which includes this site, under the Greater Norwich Local Plan.
HEL 5	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4,	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2019	Outline approval 20141134 for 72 dwellings granted Oct 2015. Reserved matters 20152077 granted April 2016. The site was completed Mar 2019.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
		SOC5, SOC7, SOC8, EC1	Level of Open space provided in relation to Policy EN3 of DM DPD		Provision within the permission in accordance with policy.
HOR 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To complete by Mar 2014	Site was completed in March 2014.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Permission was under previous Local Plan policy.
HOR 2	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2016 To complete by Mar 2019	Site was completed Mar in 2018.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Permission was under previous Local Plan policy
HNF 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2019	Full application 20182043 for 69 dwellings was submitted Dec 2018.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
HNF 2	1, 3, 7	EN1, EN9, SO6, SOC8, EC1, EC2, EC3, EC4	Type of planning application, decision & achievement of employment uses providing jobs.	To commence by Mar 2021	Application 20190681 requesting an EIA Screening Opinion was submitted shortly after the monitoring year.
HNF 3	1, 3, 7	EN1, EN9, SO6, SOC8, EC1, EC2, EC3, EC4	Type of planning application, decision & achievement of employment uses providing jobs.	To commence by Mar 2021	No activity during this monitoring year.
LIN 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2016 To complete by Mar 2018	Site was completed in March 2016
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Permission was under previous Local Plan policy.
RED 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2018	Hybrid permission 20151061 for 20 dwellings (full approval) and 4 dwellings (outline) granted Feb 2017. Reserved matters 20171054 on the 4 dwellings granted Sep 2017. 5 dwellings were completed in the monitoring year.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
REP 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2019	No progress during this monitoring year.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	
REP 2	1, 2, 3, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC6, SOC7, SOC8, EC1, EC2, EC3, EC4	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2018	Full planning 20180963 for a food store, offices, a 60 bedroom care home, 20 assisted flats, 15 assisted bungalows and a club house was granted in March 2019.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	
SAL 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2016 To complete by Mar 2017	Site was completed in Mar 2018.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Permission was under previous Local Plan policy.
SWA 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4,	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2018	Outline application 20161643 for 21 dwellings was granted Dec 2017. No works have commenced on site.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
		SOC5, SOC7, SOC8, EC1	Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Provision within the permission in accordance with policy.
SPI 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2015 To complete by Mar 2017	Site was completed in Aug 2015.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Permission was under previous Local Plan policy
TAV 1	1, 3, 6, 7	EN1, EN9, SO6, SOC8, EC1, EC2, EC3, EC4	Type of planning application, decision & provision of retail uses.	To commence by Mar 2021	Hybrid permission 20171782 for A1, A3 and A5 uses granted Feb 2018. This includes full planning for a supermarket.
TSA 1	1, 3, 7	EN1, EN9, SO6, SOC8, EC1, EC2, EC3, EC4	Type of planning application, decision & achievement of employment uses providing jobs.	To complete by Mar 2026	Allocation is part of Broadland Business Park. There are a few plots that still need to be developed. Expansion to north under Growth Triangle Area Action Plan. See section 5c below. Full planning 20181376 for an office and workshop on Plot 14 was granted Dec 2018. Works have commenced on the site.
TSA 2	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4,	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2022	Outline permission 20130649 granted. Reserved matters permission 20160425 for 231 dwellings granted Sept 2016. No works have commenced on site.

Policies	JCS Objectives	Sustainability Appraisal Objectives	Indicator	Target	Comments
		SOC5, SOC7, SOC8, EC1	Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Permission was under previous Local Plan policy.
TSA 3	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2017 To complete by Mar 2018	Outline permission 20130650 granted. Reserved matters 20160423 for 71 dwellings granted Aug 2016. No works have commenced on the site.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Permission was under previous Local Plan policy.
WRO 1	1, 2, 4, 6, 7, 9, 10, 11, 12	EN1, EN6, EN7, EN8, EN9, SOC1, SOC2, SOC4, SOC5, SOC7, SOC8, EC1	Type of planning application, decision & achievement of dwelling mix.	To commence by Mar 2016 To complete by Mar 2018	Site was completed in Mar 2018.
			Level of Open space provided in relation to Policy EN3 of DM DPD	Policy EN3 met	Permission was under previous Local Plan policy.

c. Growth Triangle Area Action Plan Monitoring Framework

Policy	Target	Milestone	Progress	Comments
GT1: Form of Development	1m ² of community, retail, business floorspace for every 30m ² of residential floorspace on Mixed Use Allocations	N/A	<p>Planning permission 20161058 for North Sprowston & Old Catton (GT12) includes a 1:20 ratio of employment floorspace to residential floorspace.</p> <p>Planning Permissions 20160498 and 20170104 for South of Salhouse Road (GT7) does not meet the target</p> <p>Planning Permission 20180193 for land east of Broadland Business Park (GT11) is likely to meet the target.</p>	Whilst permissions 20160498 and 20170104 (GT7) do not meet the standard provision is made for an onsite primary school and an offsite contribution to a community facility.
GT2: Green Infrastructure	Delivery of Public Parks at Harrison's Plantation, Beeston Park and North Rackheath Buffer	Public Access to Harrison's Woodland Park by 2015/16	Public Access to Harrison's Woodland Secured in April 2016.	

Policy	Target	Milestone	Progress	Comments
		Public Access to Beeston Park by 2016/17	Milestone not achieved.	S.73 application to vary phasing of scheme approved 22/12/2017. Beeston Park now to be delivered as part of Phase II. Milestone to be reviewed.
		Public Access to North Rackheath Buffer by 2020/21	Participative process to produce renewed masterplanning completed in accordance with Policy GT16.	Revised North Rackheath Masterplan endorsed March 2018. Milestone to be reviewed on receipt of phasing plan with future planning application.
	4ha of informal open space per 1,000 population	N/A	Target achieved.	As of 1 April 2019 all planning approvals (or Council resolutions to approve) on allocated sites included on site or off-site contributions to achieve target standard.
	Indicator: Number of Area Action Plan Allocations granted planning permission contrary to the advice of Natural England on the grounds of increased recreational impact on N2K sites. Target: Zero	N/a	Target achieved.	No planning permissions granted contrary to the advice of Natural England on the grounds of increased recreational impact on N2K sites.
GT3: Transport	Completion of Orbital Road & Cycle Links by 2026	Cranley Road to Plumstead Road 2016/17	Planning Permission Granted 28/06/2013. Milestone not achieved.	Link road has not been completed in accordance with milestone. Link Road Junction with Plumstead Road expected to commence 2020/21.

Policy	Target	Milestone	Progress	Comments
		Plumstead Road to Salhouse Road Cycle and Pedestrian Links 2019/2020	Planning Permission for majority of link granted through application 20170104 on 06/12/2018. Council resolution to grant permission for Plumstead Road junction and remaining link road through application 20161873 made on 12/07/17.	
		Wroxham Road to Salhouse Road 2019/20	Completed. Milestone achieved.	
		Wroxham Road to North Walsham Road 2019/20	Planning Permission Granted 17/02/2016. Milestone not achieved.	Delivery of link is currently subject to the successful outcome to Norfolk's Housing Infrastructure Fund: Forward Fund application.
		North Walsham Road to Spixworth/Buxton Road 2022/23	Outline Planning Permission Granted 17/02/2016. Reserved Matters application (20180708) for Strategic Infrastructure, including Link Road submitted 30/04/18.	Expected to be completed in accordance with or ahead of Milestone in accordance with revised phasing of Beeston Park scheme.
		Buxton Road to St Faiths Road 2025/26	Outline Planning Permission Granted 17/02/2016. Reserved Matters application (20180708) for Strategic Infrastructure, including Link Road submitted 30/04/18.	Expected to be completed ahead of milestone in 2019/20, in accordance with revised phasing of Beeston Park scheme.

Policy	Target	Milestone	Progress	Comments
		St Faiths Road to Airport	Planning Permission Granted (for Repton Avenue to St Faiths Lane Section) 18/05/2016. Under Construction.	Initial Feasibility Assessment for connection to Hurricane Way completed. Land dedicated as part of permission 20180920 to enable upgrade of link road commensurate with full link road Airport. Pooled CIL funding for Repton Avenue to Hurricane Way Link rescinded due to delays in scheme delivery.
		Full Cycle and Pedestrian Links 2026		
	Delivery of Salhouse Road BRT and Cycle Improvements	Cycle Link to be delivered by 2019/20	Phase I Harrison Plantation Cycle Link & Connection to Norwich Cycle Network delivered 2015. Completion of Blue Boar Lane to WHF Junction Cycle Link 2021/22.	Salhouse Road Walking and Cycling Feasibility Study Completed October 2010. Extension of Phase I link to Atlantic Way / Salhouse Road Junction, and Blue Boar Lane link expected to be completed in 2019/20. Blue Boar Lane link is ahead of milestone.

Policy	Target	Milestone	Progress	Comments
		Phase I BRT Improvements 2019/20	Milestone will not be achieved.	<p>Atlantic Way and Salhouse Road Junction re-designed from roundabout to priority junction, with capacity for future signal control, to better facilitate BRT.</p> <p>Land dedicated to enable road widening and improvements through permission on GT7 (20160498 & 20170104)</p> <p>Norwich Transforming Cities Bid seeking funding to deliver substantial transport improvements along Salhouse Road Corridor</p>
	Delivery of Broadland Way Cycle and Pedestrian Links between Dussindale and Rackheath /Stonehouse Road	BBP to Rackheath 2019/20	Milestone will not be achieved.	<p>Walking / Cycle Link Plumstead Road to Green Lane East delivered.</p> <p>£150k of pooled CIL agreed to support construction of link Plumstead Road to Green Lane.</p> <p>Improvement scheme being promoted through Transforming Cities DfT Bid.</p>

Policy	Target	Milestone	Progress	Comments
GT4: Home Farm	290 Homes Total.	N/A	120 Homes (Phases II & III) completed June 2014.	Reduction in number of homes on Phase 4 will mean that only 284 homes of the 290 homes target will be delivered.
	Phase 5 89 Homes	Phase 5 - Commencement 2014/15	Milestone achieved.	Phase V is 95% complete.
	Phase 4 81 Homes	Phase 4 - Commencement 2018/19	Milestone achieved.	Reserved Matters Planning Permission Granted for 75 homes 04/11/2015. Site Commenced 04/10/2017.
GT5: White House Farm	1,233 Homes, Road and Cycle Links, Primary School, Sports Pitches & Children's Play Space & Woodland Park	Phase I - Commencement 2014/15	Milestone achieved.	Cumulatively 673 dwellings completed by end of monitoring year. RM Permission now exists across whole of phases 1 and 2.
		Phase II - Commencement 2019/20	Milestone achieved.	First of phase II RM applications commenced 31/03/2018.
		Public Access to Woodland Park - 2018/19	Milestone achieved.	Public Access to Harrison's Woodland Park achieved in April 2016.
		Primary School - 2018/19	Design stage and land transfer underway in 2018/19. Milestone not achieved.	Norfolk County Council now expects the school to open in September 2020.

Policy	Target	Milestone	Progress	Comments
GT6: Brook Farm	600 Homes, Road and Cycle Links, Local Centre Sports Pitches & Children's Play Space & Informal Open Space	Commencement 2017/18	Outline Planning Permission granted 28/06/2013. S.73 application (20170421) approved 08/09/2017. S.73 permits 1st phase (270 homes) ahead of completion of link road. Milestone not achieved.	It is expected to enable commencement now expected 2020/21.
GT7: Land South of Salhouse Road	1,400 Homes, Road and Cycle Links, Primary School, Sports Pitches & Children's Play Space, Community Building, Police Beat Base & Informal Open Space	Commencement 2017/18	Outline Planning Permission 20160498 for 803 dwellings and 20170104 for 380 dwellings granted 11/01/2017 & 06/12/2018 respectively. Reserved Matters consent for 243 of the 803 dwellings granted on 25/09/19. Reserve matters consent for 365 dwellings on the outline for 380 granted on 18/07/2019. Milestone not achieved.	Allocation site is now expected to delivery 1,168 homes. This is less than the target of 1,400 homes. Commencement is now forecast behind milestone in 2019/20.
GT8: Land north of Plumstead Road	45 Homes, vehicular connection to Salhouse Road, formal recreation, and landscaping	Commencement 2016/17	Committee Resolution to Grant Planning Permission Granted for Roundabout and Access Road to site (20161873) 12/07/2017. Milestone not achieved.	Commencement is now forecast behind milestone.

Policy	Target	Milestone	Progress	Comments
GT9: Broadland Business Park (North Site)	7,800 sqm B1 Office 49,700 sqm B2 / B8	Commencement 2017/18	Outline Planning Permission granted 28/06/2013. Milestone not achieved.	
GT10: Broadland Gate	42,000sqm B1/B8 4,500sqm A1, A2, A3 & A4 7,500sqm C2, C3 (excluding residential) and D1 7,000sqm Hotel 2,100sqm C1, A3, A4, D2 1,200sqm Car Showroom	Commencement 2019/20	Milestone achieved.	Planning Application for Car Show Room (20171352) approved 15/02/2018. Serviced Roads on northern section, adj. Poppy Way are under construction.
GT11: Land East of Broadland Business Park	850 Homes, Primary School, Nursery, Community Building, Police Deployment Base, Cycle Links and Landscaping.	Commencement 2018/19	Outline permission for 283 homes across part of the allocation (20180193 & 20180194) granted. Milestone not achieved.	Hybrid allocation (20181601) for 550 homes submitted 02/10/18. This application has not year been determined. Commencement is now forecast behind milestone in 2020/21

Policy	Target	Milestone	Progress	Comments
GT12: North Sprowston & Old Catton	3,520 Homes & 16,000sqm of employment floorspace, Road and Cycle Links, 2 New Primary Schools, Sports Pitches & Children's Play Space, Community Building, Library and Health Facilities & Country Park - Possible Secondary School	Commencement 2016/17	Outline planning permission (20121516) granted 17/02/2016. S.73 application (20161058) to re-phase scheme approved 22/12/2017. Milestone not achieved.	Commencement is now forecast behind milestone in 2020/21.
GT13: Norwich RFU	250 Homes	Commencement 2018/19	Permission granted for the relocation of Norwich RFU by South Norfolk Council. Milestone not achieved.	Commencement is now forecast behind milestone.
GT14: Land East of Buxton Road	300 Homes	Commencement 2017/18	Outline Planning Permission (20141725) granted 21/05/2015. RM Application Submitted 19/03/2018. Milestone not achieved.	Allocation site is now expected to delivery 225 homes. This is less than the target of 300 homes. Commencement is now forecast behind milestone in 2020/21.

Policy	Target	Milestone	Progress	Comments
GT15: Land North of Repton Avenue	300 Homes and land for employment	Commencement 2016/17	<p>Outline Planning Permission (20141955) granted 18/05/2016.</p> <p>Self-Build element of the site, 12 homes, commenced in 17/18.</p> <p>RM application (20180920) for 328 homes approved on 18/01/19. Now under construction.</p> <p>Milestone not achieved.</p>	Allocation site is now expected to delivery 340 homes. This is more than the target of 300 homes.
GT16: North Rackheath	3,000 Homes & 25ha land for employment, Road and Cycle Links, 2 New Primary Schools, Local Centre Sports Pitches & Children's Play Space, Community Building, Home Waste Recycling Centre & Significant Informal Open Space - Possible Secondary School	Commencement 2019/20	Revised masterplan endorsed March 2018.	Commencement is now forecast behind milestone.
		Provision of Rackheath Buffer 2021/22		To be phased in accordance with plan to be submitted with planning application.
GT17: Land Adj. Salhouse Road, Rackheath	80 Homes (79 Net)	Commencement 2016/17	Milestone achieved.	<p>Site expected to be completed by then end of 2019/20.</p> <p>Total housing is expected to exceed target by 10 homes as a result of additional permission (20171906) granted 10/09/2018.</p>

Policy	Target	Milestone	Progress	Comments
GT18: Land South of Green Lane West	300 Homes, cycle links, landscaping	Commencement 2016/17	Full Planning Application (20171464) submitted 13/10/2017 for 322. Milestone not achieved.	Total housing is expected to exceed target by 22 homes. Commencement is now forecast behind milestone in 2020/21.
GT19: Land South of Green Lane East	150 Homes, cycle links, landscaping	Commencement 2022/23	Outline planning application (20160395) approved 31/01/2019. RM application (20191032) submitted 01/07/19.	Total housing is expected to exceed target by 7 homes. Commencement is now forecast in 2020/21.
GT20: White House Farm (North-East)	460 Homes, formal recreation, landscaping	Commencement 2020/21	Outline Planning Application (20191370) for 516 homes submitted 29/08/2019.	Total housing expected to exceed target by 56 homes. Commencement is expected in accordance with milestone.
GT21: Land east of Broadland Business Park (North Site)	300 Homes, formal recreation, landscaping	Commencement 2018/19		Commencement is now forecast behind milestone.

6. Glossary of Terms and Acronyms

Term	Description
Accessible	Easy to travel to and enter by whatever means of movement is appropriate (including public transport, cycle, on foot or (for buildings) in a wheelchair or with limited mobility).
Adopted	Formally approve. Assume responsibility for future maintenance.
Affordable Housing	Social rented, affordable rented and intermediate housing, provided to eligible householders whose needs are not met by the market. Affordable Housing Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or subsidy to be recycled for alternative affordable housing provision.
Allocated	Land which has been identified in a Local Plan and the Policies Map (or Inset Map) for a specific form of development. Allocations are contained in the Site Allocations DPD and Growth Triangle Area Action Plan DPD.
Amenity	Those qualities of life enjoyed by people that can be influenced by the surrounding environment in which they live or work. "Residential amenity" includes for example a reasonable degree of privacy, freedom from noise nuisance, air pollution etc. normally expected at home.
Annual Monitoring Report (AMR)	Annual Monitoring Report: Part of the local development framework. Local authorities are required to produce an AMR each December Annual Monitoring Report (AMR) with a base date of the previous March showing progress towards the implementation of the local development scheme and the extent to which policies in local plans are being achieved.
Area Action Plan (AAP)	Should be used to provide the planning framework for areas where significant change or conservation is needed. A key feature of AAP's will be the focus on implementation.
Biodiversity	The variety of life on earth or any given part of it.
Broadland Business Park	First allocated in the 2001 Broadland Local Plan for 78 hectares of employment, it is an established location for jobs, and of key strategic importance to the Growth Triangle.
Brownfield Land, Brownfield Site	See Previously Developed Land
Built Environment	Surroundings which are generally built up in character. The collection of buildings, spaces and links between them which form such an area.
Business (B1) Use	Use for light industry, offices (where the office does not provide a service directly to the visiting public) and research and development (as defined in the Use Classes Order). Light industry is industry which is capable of being carried out in a residential area without causing nuisance, including as a result of traffic movement.
Commercial Centre	The centre of larger market towns and collages where there is a concentration of shops and other services which cater for customers for a group of nearby settlements.
Community	(As used in this context) All of those living and working in Broadland. This includes the general public, parish and town councils, businesses, community groups, voluntary organisations, developers, statutory agencies etc.
Community Facilities	Services available to residents in the immediate area to meet the day-to-day needs of the community. Includes village halls, post offices, doctors and dentists' surgeries, recycling facilities, libraries and places of worship.
Community Infrastructure Levy (CIL)	Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area. Broadland District Council in combination with Norwich City Council and South Norfolk Council has implemented a CIL charging schedule with a list (known as the 123 List) of infrastructure projects on which the funds will be spent.
Conservation Area	Area of special historic and/or architectural interest which is designated by the Local Planning Authority as being important to conserve and enhance. Special planning controls apply within these areas.
County Wildlife Site	Wildlife habitat identified and designated as being of particular local interest of importance by Norfolk County Council and the Norfolk Wildlife Trust but which is not of sufficient national merit to be declared as a Site of Special Scientific Interest (SSSI).
Development	Defined in planning law as "the carrying out of building, engineering, mining or other operations in, on, over, or under land, or the making of a material change of use of any building or land" (see also Permitted Development).
Development Brief	A document that sets out the constraints and opportunities presented by a site, and the type of development that might be appropriate.
Development Plan	The primary consideration for the Council in determining planning applications. Comprises of the Regional Spatial Strategy and Development Plan Documents (including Minerals and Waste DPD's produced by Norfolk County Council).
Development Plan	Development Plan Documents: These are planning documents forming part of the local

Document (DPD)	development framework and which have the status of being part of the development plan. In order to acquire this status they will be subject to independent scrutiny through a public examination. Certain documents within the local development framework must be DPDs, for example the Core Strategy, Development Management Plan, Site Specific Allocations of land and Area Action Plans where produced. There must also be an adopted Policies Map which will be amended as successive DPDs are adopted.
District Centre / District Shopping Centre	A group of shops, containing at least one supermarket or superstore and other services, providing for a catchment extending beyond the immediate locality.
Employment Area	Industrial estate or other area which is used primarily for industrial, warehousing, office or other business uses falling within Classes B1, B2 and B8 of the Use Classes Order, and/or where such development is proposed.
Employment Use	Use primarily for industrial, warehousing, office or other business uses falling within Classes B1, B2 and B8 of the Use Classes Order. In the context of the local plan employment use specifically excludes retail, financial or professional services, food and drink, waste disposal or mineral extraction.
Exception Site (rural)	A small site to be used specifically for affordable housing that would normally be used for housing, because they are subject to policies of restraint. Exception sites should only be used for affordable housing in perpetuity.
Greater Norwich Development Partnership (GNDP)	To oversee the preparation of the new Local Plan the authorities involved have re-established their joint working arrangements under the Greater Norwich Development Partnership (GNDP).
Greater Norwich Local Plan (GNLP)	Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council, have agreed to work together to prepare the Greater Norwich Local Plan (GNLP). The GNLP will build on the long-established joint working arrangements for Greater Norwich, which have delivered the current Joint Core Strategy (JCS) for the area. The JCS plans for the housing and jobs needs of the area to 2026 and the GNLP will ensure that these needs continue to be met to 2036. The GNLP will include strategic planning policies to guide future development, and plans to protect the environment. It will look to ensure that delivery of development is done in a way which promotes sustainability and the effective functioning of the whole area.
Green Infrastructure	Green spaces and interconnecting green corridors in urban areas, the countryside in and around towns and rural settlements, and in the wider countryside. It includes natural green spaces colonised by plants and animals and dominated by natural processes and man-made managed green spaces such as areas used for outdoor sport and recreation including public and private open space, allotments, urban parks and designed historic landscapes as well as their many interconnections like footpaths, cycleways, green corridors and waterways.
Greenfield Land (or Site)	Land which has not previously been built on, including land in use for agriculture or forestry and land in built up areas used for outdoor sport and recreation (including public and private open space and allotments). Does not include residential garden land.
Infrastructure	The network of services to which it is usual for most buildings or activities to be connected. It includes physical services serving the particular development (e.g. gas, electricity and water supply; telephones, sewerage) and also includes networks of roads, public transport routes, footpaths etc.
Institution	Premises (not including residential) used for health care, crèche, day nursery or day centre, galleries, libraries, museum, exhibitions or worship. See also Residential Institution.
Joint Core Strategy (JCS)	The Joint Core Strategy (JCS) is a strategic local plan document produced between Broadland District Council, Norwich City Council and South Norfolk Council. This strategy sets out the key elements of the planning framework for the area. It comprises a spatial vision & strategic objectives for the area, a spatial strategy, core policies and a monitoring and implementation framework. It sets out the long term spatial vision for the area. It is a development plan document, with which all other development plans documents must conform.
Listed Building	A building of special historical and/or architectural interest considered worthy of special protection and included and described in the statutory list of such buildings published by the Secretary of State (for Culture, Media and Sport). Alteration, demolition or extension of such a Listed Building requires special consent.
Listed Building Consent (LBC)	Listed Building Consent is required from Local Planning Authorities where development involves the demolition of a listed building or a 60 Development Management DPD (2015) Appendix 1 – Glossary Term Description listed building is altered or extended in a manner which would affect its character as a building of special architectural or historic interest.
Local Development	Local Development Document: Planning documents which collectively make up the Local Plan

Document (LDD)	(previously known as the Local Development Framework (LDF)). These can either be a DPD, SPD or the SCI.
Local Development Framework (LDF)	Local Development Framework: A 'portfolio' of Local Development Documents which collectively delivers the spatial planning strategy for the LPA area. This is now referred to as the Local Plan as defined in the NPPF.
Local Development Scheme (LDS)	Local Development Scheme: Sets out the programme for preparing LDDs. This document is available to view on the Council's website (www.broadland.gov.uk).
Local Plan	The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.
Localism Act	The Localism Act devolves greater powers to councils and neighbourhoods and gives local communities more control over housing and planning decisions. It will provide for neighbourhood development orders to allow communities to approve development without requiring normal planning consent and amend the Community Infrastructure Levy, which allows councils to charge developers to pay for infrastructure as well as abolishing Regional Spatial Strategies.
Local Shopping Centre	A group of shops or services forming a centre of purely local significance. See District Shopping Centre and Commercial Area.
Local Planning Authority (LPA)	The public authority whose duty is to carry out specific planning functions for a particular area.
Monitoring	Regular collection and analysis of relevant information in order to assess the outcome and effectiveness of Local Plan policies and proposals and to identify whether they need to be reviewed or altered.
Neighbourhood Plans	A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).
Norwich Fringe	Area next to the city of Norwich, but lying in another administrative district which is predominantly developed, including open spaces encompassed within the developed area. For Broadland this includes the continuously built up parts of Hellesdon, Drayton, Taverham, Old Catton, Sprowston and Thorpe St Andrew.
Norwich Policy Area (NPA)	Part of the County which is centred on and strongly influenced by the presence of Norwich as a centre for employment, shopping and entertainment. In Broadland this includes 17 parishes, comprising the fringe and first ring of villages around the city of Norwich.
National Planning Policy Framework (NPPF)	The National Planning Policy Framework is the Government's national planning policy document setting out the key principles for sustainable development.
National Planning Practice Guidance (NPPG)	National Planning Practice Guidance is provided by the Government issuing guidance on the practical implementation of planning practices.
Northern Distributor Road (NDR)	A dual-carriageway road proposed to the north of Norwich, linking the A47 to the south-east of the city with the A1067 in the north-west.
Outline Planning Permission (OPP)	Outline Planning Permission: This gives an outline of the proposed development, such as the Permission size and height of a building, for example. Full details of the building must be provided and approved before building work can start. Detailed planning permission must be applied for within three years.
Permitted Development	Certain categories of minor development as specified in the General Permitted Development Order, which can be carried out without having to first obtain specific planning permission. This may include specified building guidelines or change of use.
Planning Obligations	Legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer to ensure that specific works are carried out, payments made or other actions undertaken to mitigate the impacts of development proposals. Often called Section 106 obligations. The term legal agreements may embrace S106. Planning obligations are also collected through Community Infrastructure Levy (CIL).
Previously Developed Land (PDL)	Any land which is or was occupied by a permanent structure (excluding agricultural and forestry buildings) and associated fixed surface infrastructure, including the curtilage of (land attached to) buildings. Includes defence buildings and land used for mineral extraction or waste disposal when there is no requirement for subsequent restoration. This excludes land in built up areas

	such as private residential gardens. Often called Brownfield land.
Policies Map	The adopted policies map illustrates all the proposals contained in development plan documents and any saved policies. It will need to be revised as each new development plan document, which has a spatial content, is adopted. As development plan documents are submitted, they will include within them a submissions policies map showing the changes which would be required upon adoption of the document.
Public Rights of Way	Public footpaths and bridleways as defined in the Countryside Rights of Way Act 2000 and permissive routes where there is no legal right of way but access is permitted by the landowner.
Renewable Energy	In its widest definition, energy generated from sources which are non-finite or can be replenished. Includes solar power, wind energy, power generated from waste, biomass etc.
Reserved Matters	These relate to design, external appearance, siting, means of access and landscaping where outline planning permission has already been granted. Conditions attached to the permission may require other details to be approved (e.g. materials).
Residential Institution	Residential establishment, (which may also provide medical care or other support) in which residents live communally with catering and housekeeping services provided centrally. Includes nursing homes, residential homes and also includes hostels where a significant element of care is involved but excludes sheltered and supported housing schemes where the dwelling units are self-contained. Also excludes hotels. See also Institution.
Section 106 Obligation (S106)	Section 106 Obligation. See Planning Obligations.
Sustainability Appraisal	Appraises policies to ensure they reflect sustainable development objectives (social, environmental and economic factors). Required by the Act to be undertaken for all local development documents. They ensure compliance with EU and UK legislation requiring Strategic Environmental Assessment.
Statement of Community Involvement (SCI)	Statement of Community Involvement: Sets out the standards which authorities will achieve with regard to involving local communities in the preparation of local development documents and development control decisions. SCI is not a DPD, but is subject to independent examination.
Strategic Environmental Assessment (SEA)	Strategic Environmental Assessment: The term used to describe environmental assessment applied to policies, plans and programmes. In compliance with European SEA directive, a formal environmental assessment of land use planning proposals and plans is required. In practice SA and SEA are often combined.
Settlement Limit	Settlement limits are identified on the Policies Map. These are areas where development appropriate to the settlement in question will usually be permitted subject to consideration of the policies of the NPPF, JCS and Development Management DPD
Site of Special Scientific Interest: SSSI	Site of Special Scientific Interest: Site or area designated as being of national importance because of its wildlife plants or flower species and/or unusual or typical geological features. SSSIs are identified by English Nature and have protected status under the Wildlife and Countryside Act 1981.
Site Specific Allocations	Allocations of sites for specific or mixed uses or development. Policies in the Site Allocations DPD will identify any specific requirements for individual sites.
Site Specific Policies	Where land is allocated for specific uses (including mixed uses), this should be highlighted in one or more DPDs. The identification of sites should be founded on a robust and credible assessment of the suitability, availability and accessibility of land for particular uses or mix of uses.
Supplementary Planning Document (SPD)	A Document which expands on policies set out in a DPD or provides additional detail. For example: Parking Standards, Affordable Housing, Design Guides, Area development brief etc. SPDs are not statutory requirements and do not form part of the Development Plan.
Strategic Housing Land Availability Assessment (SHLAA)	A Strategic Housing Market Assessment is an assessment to establish the housing need through a comprehensive understanding of what is required to address demographic change, taking into account an area's achievable economic potential. When a local planning authority undertakes this exercise, it should work with neighbouring authorities where housing market areas cross administrative boundaries.
Strategic Housing Market Assessment (SHMA)	A Strategic Housing Market Assessment is an assessment to establish the housing need through a comprehensive understanding of what is required to address demographic change, taking into account an area's achievable economic potential. When a local planning authority undertakes this exercise, it should work with
Supplementary Planning Guidance (SPG)	Supplementary Planning Guidance: Guidance published by the District Council to provide further detailed information on how Local Plan policies are to be applied or interpreted. SPG may also be prepared by Norfolk County Council to interpret Structure Plan policy or jointly, particularly where a consistent policy approach is required over an area covered by more than one local planning authority. SPG may be concerned with a particular issue, or it may give more detailed guidance of the development of a specific site, covering a whole range of issues. This is frequently referred to as a development brief.

Sustainable (Urban) Drainage System (SUDS)	Efficient drainage system which seeks to minimise wastage of water, including the use of appropriate groundcover to enable maximum penetration of clean water run-off into the ground and, where appropriate, recycling grey water within the development. Designed to minimise the impact of development on the natural water environment.
Travel Assessment	An assessment which may be required in connection with major development proposals, which looks at how people are likely to access the development and its effects on travel patterns. It will also look at how any undesirable consequences can be mitigated. It should consider how access on foot, by cycle or public transport can be promoted and how the demand for car parking can be minimised.
Use Classes Order (UCO)	Use Classes Order: The Town and Country Planning (Use Classes) Order, 1987, a statutory order made under planning legislation, which Use Class Order (UCO) groups land uses into different categories (called Use Classes). Changes of use within a use class and some changes between classes do not require planning permission. Some uses (known as sui generis) do not fall within any use class.
Windfall Site	Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available.

Appendix F - Norwich City Council Report against policies in the adopted Norwich Development Management Policies Local Plan 2014

Introduction

1. The development plan for Norwich comprises the following documents:
 - Joint Core Strategy for Broadland, Norwich and South Norfolk (the JCS) adopted in March 2011, amendments adopted January 2014;
 - Norwich Site Allocations and Site Specific Policies Local Plan (the Site allocations plan) adopted December 2014; and
 - Norwich Development Management Policies Local Plan (the DM policies plan) adopted December 2014.
2. This appendix monitors the policies in the Norwich Development Management Policies Local Plan 2014 (the DM policies plan). Monitoring of delivery of sites in the Site Allocations and Site Specific Policies Plan 2014 (Site Allocations plan) is incorporated in Appendix A of the AMR as part of the assessment of the five-year housing land supply.
3. As part of the last Annual Monitoring Report (AMR), it was not possible to include the results of monitoring of the DM policies plan for the 2017/18 period. Therefore, this report covers the periods 1st April 2017-31st March 2018 and 1st April 2018-31st March 2019. The results of both monitoring periods are displayed in the table below.
4. Norwich City Council, Broadland District Council and South Norfolk District Council are working together with Norfolk County Council, to prepare the Greater Norwich Local Plan (GNLP). The GNLP will build on the long-established joint working arrangements for Greater Norwich, which have delivered the current JCS for the area. The JCS plans for the housing and jobs needs of the area to 2026. The GNLP will ensure that these needs continue to be met to 2038. The GNLP will include strategic planning policies and will also allocate individual sites for development. It will aim to ensure that new homes and jobs are delivered and the environment is protected and enhanced, promoting sustainability and the effective functioning of the area.
5. It is anticipated that the draft (Regulation 18) GNLP will be published for consultation between January and March 2020. Publication of the Pre-Submission (Regulation 19) Draft plan is likely in early 2021 with formal submission to the Secretary of State in summer 2021, followed by public examination later in 2021 and adoption by September 2022.

6. In accordance with paragraph 33 of the National Planning Policy Framework (NPPF) and S10A of the Town and Country Planning (Local Planning) (England) Regulations 2017, Norwich City Council undertook a review of the DM policies plan and the Site Allocations plan, to review whether the plans are up to date and respond to changing local needs and circumstances. The review was carried out in October-November 2019 and endorsed by cabinet on 13 November 2019. It concludes that, in general, the local plan policies are fit for purpose at the current time, however it recommends that a full review of the Development Management Policies Local Plan should commence following the Regulation 19 consultation of the GNLP. The full conclusions of the Regulation 10A review can be found at the following link: https://www.norwich.gov.uk/info/20199/adopted_local_plan/2494/regulation_10a_review_of_the_local_plan
7. Previous AMRs set out progress on other local development documents being produced for the Local Plan for Norwich in the Local Development Scheme (LDS). The LDS was updated in October 2018 and provides a timetable for the completion of local development documents. As a result, of the conclusions of the Regulation 10A review of the local plan, the LDS will require updating to provide information on the timescales for the preparation of a new local plan, and to reflect changes to the timetable for the GNLP. The LDS can be found at the following link: https://www.norwich.gov.uk/downloads/file/1671/local_development_scheme
8. In November 2019, cabinet adopted the 'Purpose Built Student Accommodation in Norwich: evidence and best practice advice notice' (the advice note). Norwich has seen a significant rise in numbers of proposals for new purpose built student accommodation (PBSA) over the past few years. The advice note includes an assessment of the need for purpose-built accommodation and guidance on a range of issues, including the location, scale, external and internal design, and management of PBSA, and how to encourage an accommodation mix for a wide range of students. By encouraging good quality and appropriate student accommodation in Norwich, the advice note helps to support the success of the city's higher educational institutions and the city's economic prospects.
9. The Affordable Housing Supplementary Planning Document (SPD) was adopted by cabinet in July 2019. This SPD replaces the previous 2015 SPD and supplements JCS policy 4 and local plan policy DM33. Key aspects of the SPD include the extent to which proposed affordable housing meets identified needs in Norwich, the requirement to include affordable housing on sites of 10 dwellings or more and encouraging affordable housing on development proposals for care homes and purpose built student accommodation on residential land allocations via commuted sums. This document also provides best practice guidance in relation to what should be contained in viability assessment in order to better inform developers of the Council's expectations and to ease the process at the planning application stage.

10. The River Wensum Strategy has been developed by the River Wensum Strategy Partnership and was adopted by partners in summer 2018. The partnership is led by Norwich City Council, working with the Broads Authority, Norfolk County Council, the Environment Agency, and the Norwich Society. The strategy aims to manage the River Wensum and surrounding area for the benefit of the city and its residents. Its objectives include increasing access to the river for walking/cycling and for water-based leisure, enhancing the natural and historic environment, maximising the efficiency of public expenditure in the river corridor, and accessing external funding opportunities and investment to facilitate change and regeneration in the river corridor.

Summary of Main Findings

11. The AMR gives an overview of progress against the adopted policies of the DM policies plan with reference to the Monitoring Framework contained in Appendix 9 of that plan and also reproduced as Appendix 3 of the Site Allocations plan.
12. Due to time and resource constraints, the local plan monitoring for the 2017/18 and 2018/19 periods has been streamlined. As a result, information is not available for some indicators. However, where possible, general commentary on progress and notable trends or applications has been included where specific data is not provided.
13. A number of the monitoring indicators specified within Appendix 9 of the DM policies plan do not necessarily yield information that provides a full understanding of the effectiveness of the policy application and implementation. As concluded by the Regulation 10A review of the local plan, it is proposed that the monitoring indicators will also be revised as part of the full local plan review.
14. The following is a summary of the main findings of the AMR for 2017/18 and 2018/19:
- Several applications were approved across both monitoring periods resulting the loss of/reduction of the Yare Valley Character Area (YVCA). These applications were largely residential developments, and the benefits of the proposals were considered to outweigh the harm to the YVCA.
 - The number of buildings on the Heritage at Risk Register increased in 2017/18 but reduced to the lowest number in 2018/19 since the adoption of the DM policies plan.
 - The air quality indicators Nitrogen Dioxide (NO₂) and airborne particulates (PM¹⁰) remained relatively stable at the Lakenfields monitoring location. At the Castle Meadow monitoring location both NO₂ and PM¹⁰ increased across both the 2017/18 and 2018/19 periods. In particular, the PM¹⁰ figures for the 2018/19 period were at the highest level recorded since the adoption of the DM policies plan. The measured NO₂ at Castle Meadow has exceeded the Air Quality Objectives for England (DEFRA) target of 40µg/m³ (annual mean) for the past

few years and this remains the situation in the 2018/19 monitoring period. However, PM¹⁰ figures for Castle Meadow and both air quality indicators at Lakenfields remain well below this threshold.

- In 2017/18, 640 new homes were granted consent, compared with 473 new homes in 2018/19. The 2018/19 figure represents the lowest number of homes permitted in a monitoring period since the adoption of the DM policies plan and continues the year on year decrease since the 2015/16 peak of 1,018 homes. These reduced figures are as a result of the reduced number of PBSA applications and Prior Approval office to residential applications in that year.
- However, the housing commitment figures at 1st April 2019 were at their greatest since the adoption of the DM policies plan. At 7,289 dwellings, this represents a significant increase on the 4,199 dwellings from the 2017/18 monitoring period. This is attributed to the ability to include both student accommodation and communal institutional accommodation within housing delivery figures following changes to the NPPF in 2018.
- Housing completions in 2017/18 (at 235 dwellings) were at their lowest since the adoption of the DM policies plan. However, the 2018/19 figure of 1,035 completed dwellings represents a significant increase and the highest annual housing completion figure since the adoption of the DM policies plan. This is the first time housing completions have exceeded the average annual target for Norwich set by the JCS of 477 dwellings per annum. This is partly attributed to the ability to include both student accommodation and communal institutional accommodation within housing completions calculations, as well as the delivery of several large Prior Approval office to residential schemes.
- The loss of office space across the city has continued across both the 2017/18 and 2018/19 monitoring periods. The 2017/18 period saw a significant loss at -40,205m². This is the greatest amount of floorspace lost since the adoption of the DM policies plan and is attributed to several significant Prior Approval office to residential schemes. However, 2018/19 saw -11,695m², which may suggest a slowing of this trend. It will be important to continue to monitor the loss of office floorspace.
- Both 2017/18 and 2018/19 monitoring periods saw significant losses of employment floorspace outside of defined employment areas at -47,990m² and -14143m² respectively.
- Norwich is performing well overall in terms of retailing. Where defined centres are operating below recommended thresholds, an appropriate amount and variety of other supporting services is ensuring their vitality and viability. More detailed information of the latest retail survey and trends can be found in the

2019 Norwich City Centre Shopping Floorspace Monitor & Local & District Centres Monitor.

- Since the last AMR, the Norwich Airport Masterplan was endorsed by Norwich City Council cabinet and scrutiny committee on 17th October 2019, subject to submission of a Surface Access Strategy to the council within a year of endorsement.

Policy	Indicator	2017/18	2018/19	Commentary
DM1	Achieving and delivering sustainable development	n/a	n/a	Policy DM1 is an overarching policy to ensure that sustainable development is delivered in Norwich through development management decisions. Because of its generic nature it does not lend itself to detailed monitoring although it is referred to in the great majority of decisions for significant development.
DM2	Refusals on the grounds of loss of light/outlook	24	24	In both monitoring periods, 24 applications were refused on the grounds of loss of light or outlook. This number has been relatively constant since the 2016/17 monitoring period.
	Refusals on the grounds of schemes falling below minimum space standards	1	6	<p>The target for this indicator is no refusals on the grounds of falling below minimum space standards. This is a particularly challenging target, which has not been achieved in any reporting period since the adoption of the local plan. There has been a continuation of this trend across both the monitoring periods. Several of the applications recorded for the 2018/19 period involve the change of use to large HMOs and construction of student accommodation.</p> <p>It is important to note that the data recorded cannot include developments for the change of use from offices to residential under prior approval, as the General Permitted Development Order does not allow for the consideration of space standards as part of that process.</p>

Policy	Indicator	2017/18	2018/19	Commentary
DM3	% of schemes meeting relevant Building for Life 12 criteria	No data	No data	It has not been possible to monitor the Building for Life 12 indicator for several years due to resource constraints. However the emphasis has now shifted away from formal assessments to using the Bfl 12 assessment primarily as a discussion tool through the planning application process.
	% of built schemes achieving minimum net residential density (40dph)	71.2%	87.1%	There is no target for this indicator. The 2018/19 monitoring period saw 87.1% of all completed dwellings achieve a minimum density of 40dph. This is an increase over the numbers recorded in the 2017/18 period. However, these figures are still a sizeable reduction on the 93.9% achieved in the 2016/17 period.
	"Green" design features on approved development	-	-	Green and wildlife friendly design features continue to be negotiated in schemes across the city including green roofs and bat/bird boxes. As an example, the Barn Road student accommodation will include both a green and blue roof, bird boxes and bee bricks. Schemes continue to make use of landscaping as well as including small mammal accesses within boundary fencing.
DM4	Renewable energy capacity permitted by type	0	0	There is no target for this indicator. No renewable energy schemes were submitted or determined within either monitoring period.
DM5	Number of schemes approved contrary to Environment Agency advice: 1) flood protection	1	0	The target for this indicator is no schemes approved contrary to Environment Agency advice.

Policy	Indicator	2017/18	2018/19	Commentary
	2) water quality			<p>The Environment Agency raised concerns in relation to several applications in 2017/18: 17/01355/F The Marlpit, for providing an unsatisfactory FRA. This application was approved following assessment that there were wider sustainability benefits and the properties would be of flood resilient design, and 18/00062/F Rear of St Faiths House Mountergate, due to risk to life/property. This application was withdrawn.</p> <p>The Environment Agency raised concerns in relation to two applications in 2018/19: 18/01526/F New Mills Pumping Station, for providing an unsatisfactory FRA. This application was withdrawn. 18/00443/F Carrow Bridge House, for non-provision of an FRA. This application was refused, although not for reasons of flood protection or water quality.</p>
DM6	Development resulting in the loss of, or reduction in the area of: 1) SSSI 2) County Wildlife sites 3) County Geodiversity sites	0	0	The target for this indicator is no loss of SSSI, CWS or CGS sites. There was no reported loss of these sites for both the 2017/18 and 2018/19 monitoring periods.
	Development resulting in a loss or reduction in area within the Yare Valley Character Area (m ²)	0	814	<p>The target for this indicator is no loss of or reduction of the Yare Valley Character Area (YVCA) as a result of development. In the 2017/18 period, there was no loss of the YVCA.</p> <p>In the 2018/19 period, two applications were approved within the YVCA. 18/00534/F for the conversion of The</p>

Policy	Indicator	2017/18	2018/19	Commentary
				<p>Cock Public House, Long John Hill into a dwelling and for the construction of two new dwellings resulted in the reduction of 560m² of the YVCA. In this instance, the proposal was considered to result in harm to the YVCA due to impacts on its openness and undeveloped character. However, these impacts were considered to be confined to a small area and not to damage the character of the YVCA overall.</p> <p>In addition, 254m² of YVCA was lost at The Alders Cooper Lane for a new dwelling (18/01026/F). In this case, the benefits of the proposal were considered to outweigh the harm to the YVCA given that the council could not demonstrate a 5-year land supply at the time, and given the environmental characteristics of this particular site.</p>
DM7	Number of protected trees/hedgerows lost as a result of development	No data	No data	There is no target for this indicator. It has not been practicable to explicitly monitor the number of trees and hedges lost as a direct result of development.
	No of new street trees delivered through development	0	0	There is no target for this indicator. No new planning obligations were raised in either 2017/18 or 2018/19 relating to the provision of street trees, neither was there any spend of commuted sums collected in previous years for the planting of new trees. This was also the situation represented in the 2016/17 monitoring period. The development management team have secured new street planting through the imposition of planning conditions, however these are not directly monitored.

Policy	Indicator	2017/18	2018/19	Commentary
DM8	Development resulting in a net loss of open space (contrary to policy)	No data	No data	The target for this indicator is no loss of open space (contrary to policy DM8). Due to time and resource constraints, it has not been possible to monitor this indicator for the 2017/18 and 2018/19 monitoring periods.
	Areas of new open space and/or play space delivered through development	-	-	<p>There is no target for this indicator.</p> <p>Within the 2017/18 period, the transfer to the Council of two areas of public open space off of Crome Road in relation to a S106 agreement raised in 2006 (05/00569/F) was completed.</p> <p>No new obligations were raised in the 2018/19 period for the provision of open space and play. Several park and play spaces across the city were upgraded including the Runnell Play Project, Mile Cross Gardens Play Project and Castle Green Play Project.</p>
DM9	Number of listed buildings lost or demolished	0	0	The target for this indicator is no listed buildings to be lost or demolished. This indicator refers to the total loss or demolition, rather than partial demolition, which is often required to facilitate redevelopment and alterations to listed buildings. There was no reported total demolition of listed buildings within either monitoring period.
	Number of buildings on the Heritage at Risk Register	31	26	The target for this indicator is a reduction in the number of Heritage at Risk buildings from 32, which is the

Policy	Indicator	2017/18	2018/19	Commentary
				<p>2012/13 baseline. The 2017/18 period saw an increase in buildings considered at risk from the 2016/17 figure of 28. However, the number of buildings recorded on the register for the 2018/19 period represents the lowest number of buildings at risk since the adoption of the plan.</p> <p>The Council continues to work with property owners and Historic England to address the most serious problems of deterioration and neglect on the 8 priority buildings on the register.</p>
DM10	Number of permitted installations/prior approval notifications within: 1) Conservation areas 2) Other protected areas (where planning permission is required)	3	2	There is no target for this indicator. The number of telecoms applications approved in protected areas has been steadily decreasing since the peak of 5 applications in 2015/16.
	Number of appeals lost where officer recommendations are overturned	N/A	N/A	The target for this indicator is no appeals lost. There were no appeals of telecommunications applications in either monitoring period.
DM11	Number of hazardous substance consents	1	0	There is no target for this indicator. In 2017/18, there was one hazardous substances consent 17/00914/H. This application was made to vary a previous consent to cover additional hazardous substances required for the manufacture of a new herbicide.
	Impact of development on air quality indicators:	-	-	<u>2017/18</u> Lakenfields

Policy	Indicator	2017/18	2018/19	Commentary
	1) NO ₂ 2) PM ₁₀			<p>NO₂ - 13 µg/m³ (slight decrease from 2016/17) PM¹⁰ - 16 µg/m³ (no change from 2016/17)</p> <p>Castle Meadow NO₂ - 51 µg/m³ (reduced from 2016/17) PM¹⁰ - 23 µg/m³ (increased from 2016/17)</p> <p><u>2018/19</u></p> <p>Lakenfields NO₂ - 12 µg/m³ (slight decrease from 2017/18) PM¹⁰ - 16 µg/m³ (no change from 2017/18)</p> <p>Castle Meadow NO₂ - 54 µg/m³ (increased from 2017/18) PM¹⁰ - 27 µg/m³ (increased from 2017/18)</p> <p>Measurements for both nitrogen dioxide and airborne particulates are taken at Lakenfields and Castle Meadow AURN stations, respectively monitoring urban background and city centre pollutant levels. Levels have been relatively stable at Lakenfields for the past few years however, there has been a decrease in NO₂ levels in the 2018/19 period. In contrast, Castle Meadow measured an increase in both NO₂ and PM¹⁰ compared with the previous monitoring period. It is worth noting, however, that the 2018/19 figure of 54 µg/m³ for NO₂ is still well below the peak figure of 66 µg/m³ measured in 2014/15. The PM¹⁰ figure of 27µg/m³ at Castle Meadow is the highest particulates measurement since the adoption of the local plan.</p>

Policy	Indicator	2017/18	2018/19	Commentary
				The Air Quality Objectives for England (DEFRA) specify that annual mean NO ₂ should not exceed 40µg/m ³ . The measurements at Castle Meadow have exceeded this threshold for the past few years. The same targets outline that annual mean PM ¹⁰ should also not exceed 40µg/m ³ . The measurements at both Lakenfields and Castle Meadow were below this threshold.
DM12	Number of homes permitted in the monitoring period	640	473	<p>Permissions and prior approvals were granted in the monitoring period for a total of 640 new homes in 2017/18 and 473 in 2018/19.</p> <p>The 2018/19 figure represents the lowest number of homes permitted since the local plan was adopted and continues the year on year decrease since the peak of 1018 homes permitted in 2015/16. The 2017/18 and 2018/19 figures include homes from both prior approval changes of use from office to residential and student and communal accommodation.</p> <p>Notable new permissions within 2017/18 include consent for 199 homes at Sentinel House on Surrey Street and 42 dwellings at the former BT Telephone Exchange on Westwick Street. In 2018/19, permission was granted for 151 dwellings at St Mary's Works, Duke Street and 73 dwellings on Land North of Carrow Quay.</p>
	Annual change in total housing commitment (number of dwellings)	4199	7289	At 1 April 2018 the total number of dwellings with outstanding planning stood at 4,199. The total number as

Policy	Indicator	2017/18	2018/19	Commentary
	with outstanding planning permission but unbuilt)			of 1st April 2019 was 7,289 which is significantly greater than the housing commitment of the previous monitoring periods. This significant increase is likely due to the ability to now include student and communal institutional accommodation within the housing commitment due to changes in the NPPF. Further discussion of issues around communal accommodation appears below in DM13.
	Number of housing completions	235	1035	The number of new homes completed dipped to the lowest figure in 2017/18 since the adoption of the local plan, at 235 dwellings. However, housing completions increased significantly within the 2018/19 monitoring period at 1035 dwellings. This is the first time housing completions have exceeded the average annual target for Norwich set by the JCS (477 dwellings per annum). This is partly attributed to the ability to include student and communal residential accommodation within housing completion calculations. In addition, a number of significant office to residential prior approval schemes were completed including Sentinel House on Surrey Street (191 dwellings).
	Housing land supply	N/A	N/A	This information is reported in the main body of the JCS AMR.
DM13	Number of HMO licences	No data	No data	No specific data were collected for this indicator. The requirements and guidelines for HMO licenses under Private Sector Housing differ from issues covered under the planning process. Therefore, the number of HMO

Policy	Indicator	2017/18	2018/19	Commentary
				<p>licenses does not provide any indication as to the success of policy DM13.</p> <p>The number of applications for large HMOs has continued to be prevalent throughout both monitoring periods. Following an appeal decision in relation to an enforcement notice for a large HMO, the Council has taken a stronger stance on the application of Policy DM13 for this type of application. There have been multiple successful appeals against the refusal of HMO applications, including 18/00544/F 21 Sotherton Road, 18/01721/F 2 Edgeworth Road and 18/01583/U 36 Primula Drive.</p>
	Institutional development permitted on housing allocations (hectares)	0.65	0.42	<p>The target for this monitoring indicator is no institutional development permitted on allocated housing land. Both monitoring periods saw the loss of such land to institutional development. In 2017/18, this was as a result of consents at the Bartram Mowers site and St Stephens Towers. In 2018/19, this loss was attributed to the consent at Barn Road car park.</p> <p>Although the target for this indicator was not strictly met, the development consented on allocated housing land was of a residential nature.</p>
	Number of student bedrooms permitted	1425	404	There is no target for this indicator. There was a significant increase in the number of student bedrooms permitted in the 2017/18 period. This is attributed to

Policy	Indicator	2017/18	2018/19	Commentary
				several large schemes being granted consent in this period such as 614 beds at St Crispins House and 702 beds at St Stephens Towers. The number of student bedrooms permitted in 2018/19 was reduced significantly, as fewer and smaller schemes were approved. Examples include Barn Road car park for 120 beds and Mary Chapman Court for 40 beds.
	Number of residential institution bedrooms permitted	3	46	There is no target for this indicator. The number of institutional bedrooms permitted in 2017/18, at 3 bedrooms, is relatively low compared with previous monitoring years. This resulted from a change of use of a dwelling to a residential educational training facility at 40 Angel Road and a variation to the Bartram Mowers permission to include one additional living unit. In 2018/19, the number of bedrooms increased to 46, more in line with previous monitoring periods. This was attributed to a single application for the conversion of an existing care home to provide 46 bed spaces (net increase of 7 beds) at Mountfield, Millcroft.
DM14	Number of new pitches permitted	0	0	The target for this indicator is no overall loss of pitches. There were no new pitches permitted within either the 2017/18 or 2018/19 monitoring periods. It is understood that Broadland Housing Association are intending to commence implementation permission 16/01554/F to create 13 new pitches and an associated amenity block before it expires in January 2020.

Policy	Indicator	2017/18	2018/19	Commentary
	Loss of existing pitches	0	0	<p>The target for this indicator is no overall loss of pitches.</p> <p>No pitches were lost within either the 2017/18 or the 2018/19 monitoring periods.</p>
DM15	Number of dwellings lost to other uses (where planning permission is required)	0	0	<p>There is no target for this indicator. This indicator records implemented permissions only. In 2017/18 application 17/01516/F 40 Angel Road was approved for the change of use of one dwelling to C2 institutional accommodation. However, this permission has not yet been implemented and therefore the loss of the dwelling has not occurred. Similarly, there were no recorded losses of dwellings to other uses within the 2018/19 period.</p>
	Loss of allocated housing land to other uses (number of allocated dwellings)	250	40	<p>There is no target for this indicator. The 2017/18 monitoring period saw the loss of 250 dwellings allocated at St Stephens Towers when application 17/00357/F was approved for 702-bedroom student accommodation. In 2018/19, application 18/01315/F Barn road Car Park saw the loss of 40 allocated dwellings with the approval of a 302-bed student accommodation block.</p> <p>In the above cases, there was acknowledgement that development would be contrary to the respective site allocations. Consent was granted, on balance, given ownership circumstances, unviability of the other elements of the allocation policies and the benefit of relieving pressures that student living has elsewhere in</p>

Policy	Indicator	2017/18	2018/19	Commentary
				<p>the city as well as addressing the need for student accommodation in the city.</p> <p>Since the above decisions, the Council has adopted the Purpose Built Student Accommodation in Norwich: Evidence and Best Practice Advice Note, which outlines the need for student accommodation within the city and setting out best practice principles as a guide to development proposals.</p>
DM16	<p>Use Class B development permitted (m²):</p> <p>Class B1 (a) offices, Class B1 (b) R&D Class B1 (c) industrial uses suitable in residential areas</p>	-	-	<p>The target for this indicator is to contribute to the JCS target of 100,000m² increase by 2026.</p> <p><u>2017/18</u> B1a (Offices): minus 40,205m² B1b (Research and Development): 113m² B1c (Industrial uses suitable in residential areas): minus 217m²</p> <p><u>2018/19</u> B1a: minus 11,695m² B1b: 0m² B1c: 145.4m²</p> <p>The data for both monitoring periods shows that the trend of the loss of office space within the city is continuing. The 2017/18 period saw significant losses; the greatest loss of any previous monitoring period since the local plan was adopted. However, although there was still</p>

Policy	Indicator	2017/18	2018/19	Commentary
				<p>a loss of office space in 2018/19 this was at significantly reduced scale and could suggest a slowing of this trend. The significant loss of office space within the city is attributed to the change of use of office to residential dwellings under the prior approval process. Applications of particular note include 17/00304/PDD for 199 residential units at Sentinel House and 17/00357/F for the provision of 702 student bedrooms at St Stephens Towers. The Council is considering its options for responding to this loss, including the potential introduction of an Article 4 Direction.</p> <p>R&D floorspace has remained relatively stable over the last few monitoring periods with little or no change reported.</p> <p>2018/19 was the first time positive floorspace was reported for light industrial uses. Over previous monitoring periods, continual losses of light industrial floorspace was as a result of a proliferation of changes of use to leisure uses. The positive figure for 2018/19 is attributed to the construction of new floorspace at Old Hall Road 18/00471/F and change of use at 41 Barker Street 18/00609/U.</p>
	<p>Employment uses permitted(net change): a) within employment areas b) elsewhere</p>	<p>a)-7952 b) -47990</p>	<p>a)182 b)-14143</p>	<p>The target for this indicator is to contribute to the JCS target of 100,000m² increase by 2026.</p> <p><u>2017/18</u></p>

Policy	Indicator	2017/18	2018/19	Commentary
				<p>Employment Area – Gains: 3126m² Losses: minus 11,295 m² Net change: minus 7952 m²</p> <p>Elsewhere - Gains: 711 m² Losses: minus 49,249 m² Net change: minus 47,990 m²</p> <p><u>2018/19</u> Employment Area – Gains: 462 m² Losses: minus 280 m² Net change: 182 m²</p> <p>Elsewhere – Gains: 1663 m² Losses: minus 15,806 m² Net change: minus 14,143 m²</p> <p>The overall trend across both the 2017/18 and 2018/19 monitoring periods was the loss of employment floorspace across the city as a whole. Encouragingly, 2018/19 saw a net increase in the amount of employment floorspace within designated employment areas.</p>
DM17	Loss of B1a use class office space under 1,500m ² (m ²)	-5902	-2063	The target for this indicator is no loss of small office space (under 1,500 m ²).

Policy	Indicator	2017/18	2018/19	Commentary
				The data show that the target for this indicator was not met for both monitoring periods and the net loss of office space continued through to 2018/19. 2017/18 saw a significant loss in floorspace compared to the previous monitoring year, however this trend appears to have slowed over the 2018/19 period. Across both monitoring periods, the loss of office floorspace under 1500m ² is largely attributed to permissions for residential dwellings or changes to Class D leisure and non-residential institution uses.
	New small/medium business space permitted (premises up to 1500m ²) (m ²)	4818	2645	The target for this indicator is to contribute to the JCS target of 100,000m ² increase by 2026. The upturn in consents for small and medium scale business space continued, in 2017/18. However, this was not the case for 2018/19. Most notably there were no permissions for R&D, light industrial or storage and distribution uses in the 2018/19 period which has contributed to the reduction in permitted business floorspace overall within the latest monitoring period.
DM18	Main town centre uses permitted (m ²): a) within defined centres b) elsewhere	a) 1708 b) 19852	a) 5507 b) 7010	There is no target for this indicator. The purpose of this indicator is to monitor whether development is being located in the most sequentially preferable locations, in accordance with the hierarchy of centres, contained within the JCS. The data shows that in

Policy	Indicator	2017/18	2018/19	Commentary
				both 2017/18 and 2018/19 monitoring periods, a greater number of main town centre uses were permitted outside of defined centres, contrary to the core aims of the policy. This was particularly the case for the 2017/18 period and is likely as a result of 17/00605/U at 10 St Francis Way and 17/01607/U at Guardian Road Industrial Estate both for changes of use of significant floorspace to gyms.
	New retail floorspace permitted (m ²) in: a) city centre b) district centres c) local centres	a)-1382 b) -32 c) 0	a)-2417 b) -183 c) 0	The target for this indicator is the contribution towards the provision of 20,000m ² net of comparison goods floorspace to 2016 and no loss of floorspace in district and local centres. Across both monitoring periods, and across the city overall, there was a net loss of retail floorspace. This trend was more evident in 2018/19. Only district centres saw any gain in retail floorspace during 2017/18. This is concurrent with the findings of the latest Retail Monitor which includes further explanation as to the loss of retail floorspace overall. Interestingly, local centres saw no change in the retail floorspace across both monitoring periods. The data shows that the loss of retail floorspace does not contribute to the JCS target.
	Development approved contrary to the maximum indicative floorspace limits for individual units in appendix 4 (unless specifically allocated): a) within defined centres	0	0	There is no target for this indicator. No development was approved within district or local centres contrary to the indicative scales of development set out in Appendix 4 of the DM Policies Plan.

Policy	Indicator	2017/18	2018/19	Commentary
	b) elsewhere			
	Number of C1 hotel: a) floorspace (m ²) b) bedrooms permitted	a) 3381 b) 168	a)3565 b) 92	There is no target for this indicator. No new hotel bedrooms were permitted in 2016/17. Both the 2017/18 and 2018/19 monitoring periods saw relatively high permitted hotel floorspace and bedrooms compared with previous monitoring periods . Notable permissions in 2017/18 include 17/0016/F Land and Buildings North East of Spitfire Road for 125 beds. Applications 16/01950/O St Marys Works for 85 beds, 18/01140/MA at The Quebec for 2 beds and 18/01453/U 547 Earlham Road for 5 beds were approved in 2018/19.
	Improvements to public realm as a result of development	-	-	There is no target for this indicator. Due to time and resource constraints, it has not been possible to monitor this indicator for the 2017/18 and 2018/19 monitoring periods.
DM19	Use Class B1a office floorspace permitted (m ²): a) within the office development priority area (ODPA) b) elsewhere in city centre c) in employment areas d) elsewhere	a) 0 b) 639 c) 114 d) 72	a) 544 b) 776 c) 209 d) 343	The target for this indicator is to contribute to the JCS target of 100,000m ² increase by 2026. The 2016/17 monitoring period saw a significant upturn in the number of consents for new office floorspace. For the 2017/18 period, the number of consents were reduced on the previous year's figures across all areas of the city, although the ODPA appears to have been particularly affected with no change in permitted floorspace. The 2018/19 period is more encouraging with increased permitted office floorspace in all areas of the city

Policy	Indicator	2017/18		2018/19	Commentary
					compared with the 2017/18 figures. A notable permission from this year includes 18/01505/F Lloyds TSB 2 Surrey Street for the change of use of the first and second floors to offices which contributed 544m ² within the ODP. It is important to note these trends in the context of overall net loss of floorspace across the city.
	Loss of office floorspace (m ²)		-40205	-11695	<p>The target for this indicator is to contribute to the JCS target of 100,000m² increase by 2026.</p> <p>The data for both monitoring periods shows that the trend of the loss of office space within the city is continuing. The 2017/18 period saw significant losses; the greatest loss of any previous monitoring period since the local plan was adopted. However, although there was still a loss of office space in 2018/19 this was at significantly reduced scale and could suggest a slowing of this trend. The significant loss of office space within the city is attributed to the change of use of office to residential dwellings under the prior approval process. Applications of particular note include 17/00304/PDD for 199 residential units at Sentinel House and 17/00357/F for the provision of 702 student bedrooms at St Stephens Towers. The Council continues to look into what would be an appropriate response to this loss, including the potential introduction of an Article 4 Direction.</p>
	Percentage of measured ground floor frontage in A1 retail use in each	PC01	87.3%	88.8%	There is no target for this indicator.
		PC02	95.6%	85.2%	

Policy	Indicator	2017/18		2018/19	Commentary
DM20 ¹¹	defined retail frontage zone in the centre (primary/secondary/large district centres)	PC03	97.1%	97.1%	The aim of the policy is to ensure that none of the specified frontage zones drop below the thresholds indicated in the Main Town Centre and Retail Frontages SPD. There are specific thresholds for each of the retail centres.
		PR01	69.0%	69.7%	
		PR02	72.2%	71.4%	
		PR03	83.7%	84.1%	
		PR04	N/a	N/A	
		PR05	N/a	N/A	
		PR06	67.7%	66.0%	In 2017/18, none of the frontages dropped below their minimum thresholds. The most significant decrease was PR02 The Lanes East (Bedford Street/Bridewell Alley), which still had low vacancy levels but many units have changed use to bars, cafes and other leisure uses.
		SR01	76.2%	74.1%	
		SR02	61.1%	65.4%	
		SR03	60.5%	59.2%	
		SR04	N/a	N/A	
		SR05	N/a	N/A	In 2018/19, only one retail frontage area SR03 St Benedicts Street dropped below the minimum threshold. This frontage area had a relatively high proportion of A2, A3 and A4 uses. The most significant decrease in retail frontage was at PC02 Castle Mall. This is associated with the reduction in vacancy rates within the Mall, through the introduction of non-retail leisure uses.
		LD01	62.4%	61.0%	
		LD02	N/a	N/A	
					It is worth noting that there still exists permitted development rights, which results in a degree of flexibility of the uses across the city such as the ability to change between shops and financial and professional services etc.
		PC01	87.3%	88.8%	There is no target for this indicator.

¹¹ See note at end of table for list of defined centres referred to in policies DM20 and DM21.

Policy	Indicator	2017/18		2018/19	Commentary
	Zones where the proportion of measured ground floor frontage in A1 retail use is below the indicative minimum threshold specified in SPD	PC02	95.6%	85.2%	See above commentary.
		PC03	97.1%	97.1%	
		PR01	69.0%	69.7%	
		PR02	72.2%	71.4%	
		PR03	83.7%	84.1%	
		PR04	N/a	N/A	
		PR05	N/a	N/A	
		PR06	67.7%	66.0%	
		SR01	76.2%	74.1%	
		SR02	61.1%	65.4%	
		SR03	60.5%	59.2%	
		SR04	N/a	N/A	
		SR05	N/a	N/A	
		LD01	62.4%	61.0%	
	LD02	N/a	N/A		
	% of units within zones breaching indicative policy thresholds (if any) which support the evening economy/vitality and viability	SR03	-	23%	<p>There is no target for this indicator. The purpose of this</p> <p>In 2017/18, no zones breached the minimum thresholds and therefore data were not collected for this indicator.</p> <p>In 2018/19, 23% of the uses within SR03 St Benedicts Street supported the evening economy and the vitality/viability of the city overall. This particular area has a significant proportion of bars and restaurants, which contributes strongly to its character and serves as an extension of the services and leisure facilities available within the city centre.</p>
DM21		DC01	52.9%	52.9%	

Policy	Indicator	2017/18	2018/19	Commentary
Proportion of A1 uses within district and local centres	DC02	73.3%	73.3%	The target for this indicator is that the proportion of retail uses within district centres should not fall below 60%, and in local centres, 40%.
	DC03	47.4%	47.4%	
	DC04	53.3%	54.8%	
	DC05	59.1%	57.1%	Overall, vacancy rates have increased to 11.7% from 9.6% in 2016. In 2018, the number of units has decreased from 198 to 197; however, this is through the merging of 2 units in Plumstead Road (DC04). The vacancy figures show a gradual decline over recent years with 88% of retail units now occupied. The percentage of non-retail units is 41%, which is a gradual decrease from recent monitoring years.
	DC06	82.4%	80.0%	
	DC07	53.8%	53.8%	
	DC08	64.9%	64.9%	
	DC09	57.1%	50.0%	
	DC10	55.0%	55.0%	
	LC01	85.7%	85.7%	
	LC02	53.6%	50.0%	
	LC03	57.1%	57.1%	
	LC04	64.3%	64.3%	
	LC05	55.6%	55.6%	
	LC06	47.6%	47.6%	7 out of 10 district centres have exceeded the 40% non-retail threshold and 7 out of 30 local centres have exceeded the 60% non-retail threshold. Earham House (DC06), which was previously the poorest performing district centre, has now been refurbished and enjoys occupation of 15 of 17 units and is one of the best performing retail centres. Bowthorpe (DC01) is the poorest performing with a vacancy rate increase from 17.6% in 2016 to 35.3% in 2018. Hall Road (DC09) was regarded as poorly performing in 2016; the situation remains unchanged with 2 out of 7 long-term vacant units & 3 of the occupied units being non-A1 retail use. Two of the district centres (DC03: Eaton Centre & DC07: The Larkman) continue to have all of their units occupied.
	LC07	25.0%	25.0%	
	LC08	87.5%	87.5%	
	LC09	50.0%	53.8%	
	LC10	50.0%	50.0%	
LC11	42.9%	42.9%		
LC12	66.7%	66.7%		
LC13	50.0%	50.0%		
LC14	28.6%	28.6%		
LC15	50.0%	50.0%		
LC16	65.0%	55.0%		
LC17	81.2%	81.2%		
LC18	54.5%	54.5%		
LC19	66.7%	66.7%		

Policy	Indicator	2017/18	2018/19	Commentary	
		LC20	70.0%	72.7%	As recorded in the 2019 Retail Monitor, despite a number of centres offering non-retail uses above the thresholds outlined in policy DM21, overall, the district and local centres continue to perform their function and offer an appropriate range of services and facilities.
		LC21	80.0%	80.0%	
		LC22	66.7%	66.7%	
		LC23	60.0%	60.0%	
		LC24	22.2%	22.2%	
		LC25	80.0%	80.0%	
		LC26	50.0%	50.0%	
		LC27	20.0%	20.0%	
		LC28	35.7%	35.7%	
		LC29	85.7%	85.7%	
		LC30	53.6%	50.0%	
	Loss of anchor food store floorspace (m ²)	0	0	<p>The target for this indicator is no loss of anchor foodstore floorspace.</p> <p>There has been no loss of anchor foodstore floorspace within defined centres across the monitoring periods. Within the Aylsham Road District Centre (DC05) one foodstore (Lidl) closed but re-opened in a larger store within the same centre.</p>	
	Proportion of community uses/non-retail uses in district and local centres	No data	No data	<p>There is no target for this indicator.</p> <p>Due to time and resource constraints, it has not been possible to monitor this indicator for either the 2017/18 or 2018/19 monitoring periods.</p>	
DM22	New community facilities permitted	No data	No data	There is no target for this indicator.	

Policy	Indicator	2017/18	2018/19	Commentary
				Due to time and resource constraints, it has not been possible to monitor this indicator for the 2017/18 and 2018/19 monitoring periods.
	New education or training facilities permitted	No data	No data	There is no target for this indicator. Due to time and resource constraints, it has not been possible to monitor this indicator for the 2017/18 and 2018/19 monitoring periods.
	Loss of a) community facilities and b) Public Houses	a) No data b) 2	a) No data b) 1	There is no target for this indicator. Due to time and resource constraints, it has not been possible to monitor the loss of community facilities for the 2017/18 and 2018/19 monitoring periods. During 2017/18, two permissions were granted which would result in the loss of public houses 17/01706/F King Edward VII, Aylsham Road for the change of use to an Islamic Community Centre and Café and 17/02033/F The Quebec, Quebec Road for the change of use to a B&B. In 2018/19, one application was approved for the conversion of the existing pub to residential and construction of two additional dwellings at The cock Long John Hill (18/00534/F).
	ACV registrations	2	2	There is no target for this indicator. Within the 2017/18 period, the new ACV registrations were for The Brickmakers and Fiveways pubs. In 2018/19,

Policy	Indicator	2017/18	2018/19	Commentary
				a further pub, The York Tavern, was registered as well as Train Wood, which was registered for its benefits and contribution to social wellbeing or social interests of the local community.
DM23	Development of new evening economy and leisure uses	No data	No data	<p>The target for this indicator is to contribute to the JCS target for the provision of 3000(m²) of leisure and tourism floorspace by 2016.</p> <p>Due to time and resource constraints, it has not been possible to monitor this indicator for either the 2017/18 or the 2018/19 monitoring periods.</p>
	Development of late night uses in the a) late night activity zone and b) elsewhere (m ²)	<p>a) 0</p> <p>b) 46</p>	<p>a) 0</p> <p>b) 46</p>	<p>The target for this indicator is no late night activity uses outside of the late night activity zone (LNAZ).</p> <p>In 2017/19, one application for a late night use was permitted outside of the LNAZ. This comprised 46m² at Gonzos on London Street for the creation of a roof top bar for a temporary period. Whilst, strictly, the target has not been met, it should be noted that the creation of the rooftop bar forms part of an existing late night premises and is very close to the boundary of the late night activity zone, as well a number of other late night uses located along Queen Street.</p> <p>This permission was renewed for a further temporary period within 2018/19.</p>

Policy	Indicator	2017/18	2018/19	Commentary
DM24	Floor space (m ²) for A5 uses within: a) district centres b) local centres c) elsewhere	a) 125 b) 96 c) 0	a) 0 b) 0 c) 0	<p>There is no target for this indicator.</p> <p>The purpose of this indicator is to monitor whether A5 hot food takeaway floorspace is being directed to defined centres to minimise their impacts on residential amenity and on highway and pedestrian safety.</p> <p>The 2017/18 monitoring period saw more A5 floorspace approved overall than the 2018/19 period. This consisted of two permissions within district centres at Aylsham Road (85m²) and Plumstead Road 40m²). Interestingly, no new A5 floorspace was recorded in the 2018/19 period.</p>
	No refusals on grounds of amenity	0	0	<p>There is no target for this indicator.</p> <p>There were no refusals on ground of amenity for A5 uses within either of the monitoring periods.</p>
DM25	Number of approvals and refusals to vary conditions on retail warehousing and other retail premises	0	0	<p>There is no target for this indicator.</p> <p>There were no applications to vary conditions on retail warehousing and other retail premises within either the 2017/18 or 2018/19 monitoring periods.</p>
DM26	Progress on the implementation of the UEA Masterplan	-	-	<p>The strategic masterplan for the UEA is embodied in the UEA Development Framework Strategy, November 2010 (the DFS) which identified three areas for development; Earlham Hall, the Blackdale School site and land between Suffolk Walk and Bluebell Road. Each of these has been</p>

Policy	Indicator	2017/18	2018/19	Commentary
				<p>allocated in the adopted Norwich Site Allocations Local Plan: respectively sites R39, R40 and R41.</p> <p>The UEA current projections are for an incremental increase in overall student numbers of 22% from 2016/17 (17,195 total full and part-time students) to 2035/36 (22,000 total students). Progress has been made on a new DFS, which has been reported to Cabinet in summer 2019, and will be subject to public consultation in early 2020 as part of the evidence base for the Greater Norwich Local Plan.</p> <p>Notable permissions at the University across the last two monitoring periods include 17/01296/F for 7150m² of new academic floorspace on Chancellors Drive, which was complete and occupied at the start of the academic year 2019/20. An application has been submitted for Sky House 19/01427/F 15,757m² of academic floor space, which is currently pending determination.</p>
DM27	Progress on the implementation of the Airport masterplan	-	-	<p>Work continued on the production of a masterplan for the Airport, being led by the Airport itself in discussion with Norwich City and Broadland District councils. The draft masterplan was published for consultation in July 2017. The masterplan was endorsed by Norwich City Council cabinet and scrutiny committee on 17th October 2019. This was endorsed with the provision that a Sustainable Access Strategy (SAS) is provided within 12 months of the endorsement date, which will help to</p>

Policy	Indicator	2017/18	2018/19	Commentary
				inform site specific allocations and other strategic policy for the Airport in the emerging Greater Norwich Local Plan.
	Relevant applications	-	-	<p>During 2017/18, there were no significant permissions for new development within the airport operational area during the monitoring year.</p> <p>During 2018/19, 17/01555/O was approved for a vehicle hire business at land and premises opposite 153 Holt Road. This site is not within the airport operational boundary but is nearby.</p> <p>A planning application (18/01621/VC) was submitted in late 2018 to vary conditions on an earlier consent (16/00965/VC). This has been revised to allow the development of 50% of the application site for aviation uses and 50% for general employment uses in accordance with the airport masterplan. A decision on this application is pending.</p>
DM28	Site specific obligations for transport improvements	0	0	<p>There is no target for this indicator.</p> <p>No new planning obligations were raised for transport improvements within either monitoring periods.</p>
	Walking and cycling levels at each main cordon	No data	No data	<p>There is no target for this indicator.</p> <p>Due to time and resource constraints, it has not been possible to monitor this indicator for either the 2017/18 or the 2018/19 monitoring periods.</p>

Policy	Indicator	2017/18	2018/19	Commentary
	CIL spending on Reg 123 List	0	0	<p>There is no target for this monitoring indicator.</p> <p>During both 2017/18 and 2018/19 monitoring periods, there was no spend of commuted sums for transport improvements.</p>
	Enhancements to strategic cycle network	-	-	<p>There is no target for this indicator.</p> <p>The Council was awarded Government funding to spend on cycle safety schemes within the city in 2018. In 2019, work was completed to upgrade both the Fiveways and Guardian Road roundabout junctions as well as the implementation of the Earlham road cycle lane. The yellow and blue pedalways were largely completed and the implementation of city centre accessibility schemes including contraflow cycle lanes (such as Prince of Wales road) commenced.</p>
	Progression of introduction of Bus Rapid Transport System scheme	-	-	<p>There is no target for this indicator.</p> <p>In early to mid-2018, the council submitted bids to Transforming Cities for the Bus Rapid Transport System. The Council were successful in their bid and were awarded funding to implement the cross-city network of busses infrastructure plan. The first part of the scheme has been underway in 2019 through the implementation of the changes along Prince of Wales Road. Further information can be found at:</p>

Policy	Indicator	2017/18	2018/19	Commentary
				www.norfolk.gov.uk/transformingcities
DM29	Number of car parking spaces lost/gain (estimated)	9793	9944	The target for this indicator is no increase in parking spaces above 10,000 spaces. The number of parking spaces has increased steadily since the adoption of the local plan but the ceiling of 10,000 spaces has not been breached. In the 2017/18 and 2018/19 monitoring periods, several permissions to use car parks for further temporary periods were given permission, including 17/01643/F – Mountergate car park and 18/01117/F – and former Eastern Electricity Board Site Duke Street.
DM30	Expansion of 20mph zones	-	-	<p>Policy DM30 sets local planning criteria for the consideration of proposals involving the creation of new vehicular accesses. It requires measures to be included in new developments, which improve highway safety by: removing unnecessary access points onto main traffic routes, designing to limit traffic speeds to 20mph, ensuring pedestrian safety and adequate circulation within the site and allowing for any alterations to on-street parking arrangements necessary as a result of the new development.</p> <p>Development proposals continue to be designed to achieve 20mph traffic zones. Some recent improvements include the Earlham Road upgrades.</p> <p>The Norwich Northern Distributor Road, now formally known as Broadland North Way, was completed in 2018.</p>

Policy	Indicator	2017/18	2018/19	Commentary
				Many of the expected benefits a have started to be realised in form of traffic congestion relief on some city roads and a consultations was held at the end of 2018 on the route of the Norwich Western Link.
DM31	No. applications refused on car parking, servicing, cycle parking grounds	2	No data	<p>There is no target for this indicator.</p> <p>During the 2017/18 monitoring period, two applications were refused on the grounds of policy DM31. These permissions include 17/01177/F - 12A Old Palace Road for 3 bungalows, which was refused on access and servicing grounds, and 15/00455/F – Legarda Court for 4 flats, which was refused on bin storage grounds.</p> <p>Due to time and resource constraints, it has not been possible to monitor the number of applications refused on the grounds of DM31 for the 2018/19 monitoring period.</p>
DM32	No. approved schemes of low car and car free housing	No data	No data	<p>There is no target for this indicator.</p> <p>Due to time and resource constraints, it has not been possible to monitor the number of approved low car and car free housing schemes.</p> <p>However, the Council continues to negotiate both low car and car free housing on developments (both large and small) that are located in appropriate and sustainable locations. Such examples include, the Barn Road student</p>

Policy	Indicator	2017/18	2018/19	Commentary
				accommodation (car free), 4 new dwellings at Lincoln Street (car free), as well as the majority of residential schemes approved within the city centre.
DM33	N/A	N/A	N/A	<p>This indicator has not been monitored in previous years.</p> <p>Although outside of the 2018/19 monitoring period, the Affordable Housing SPD was produced and adopted in July 2019. Key aspects of the SPD include the extent to which proposed affordable housing meets identified needs in Norwich, the requirement to include affordable housing on sites of 10 dwellings or more and encouraging affordable housing on development proposals for care homes and purpose built student accommodation on residential land allocations via commuted sums. This document also provides best practice guidance in relation to what should be contained in viability assessment in order to better inform developers of the Council's expectations and to ease the process at the planning application stage.</p>

Note: List of defined centres referred to in policies DM20 and DM21.

<u>DM20 list of defined centres</u>	<u>DM21 list of defined district and local centres</u>
PC01 – Gentleman’s Walk	DC01 – Bowthorpe
PC02 – Castle Mall (levels 1 and 2)	DC02 – Drayton Road
PC03 – Chapelfield (main retail levels)	DC03 - Eaton centre
PR01 – Back of the Inns/Castle Street	DC04 - Plumstead Road
PR02 – The Lanes East	DC05 - Aylsham Road/Mile Cross
PR03 – St Stephen’s Street/Westlegate	DC06 - Earlham House
PR04 – Castle Meadow North	DC07 - The Larkman
PR05 – Chapelfield Plain	DC08 - Dereham Road/Distillery Square
PR06 – Timberhill/Red Lion Street	DC09 - Hall Road
SR01 – The Lanes West	DC10 - Sprowston Road/Shipfield
SR02 – Upper St Giles Street	LC01 - Hall Road/Trafalgar Street
SR03 – St Benedict’s Street	LC02 - Hall Road/Queens Road
SR04 – Elm Hill/Wensum Street	LC03 - Hall Road/Southwell Road
SR05 – London Street East	LC04 - Grove Road
LD01 – Magdalen Street/Anglia Square	LC05 - Suffolk Square
LD02 - Riverside	LC06 - Unthank Road
	LC07 - St Augustines Gate
	LC09 - Aylsham Road/Junction Road
	LC10 - Aylsham Road/Glenmore Gardens
	LC11 - Aylsham Road/Boundary Road
	LC12 - Woodcock Road
	LC13 - Catton Grove Road
	LC14 - Magdalen Road
	LC15 - Sprowston Road/Silver Road
	LC17 - Bishop Bridge Road
	LC18 - Earlham West centre

	<p>LC19 - Colman Road/The Avenues LC20 - Colman Road, The Parade LC21 - Woodgrove Parade LC22 - St John's Close/Hall Road LC23 - Tuckswood centre LC24 - Witard Road LC25 - Clancy Road LC26 - UEA LC27 - Long John Hill LC28 - Magdalen Road/Clarke Road LC29 - Aylsham Road/Copenhagen Way LC30 - St Stephens Road</p>
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Appendix G: South Norfolk District Council Annual Monitoring Report 2018-19

Executive Summary

This report outlines the progress against targets set out in the monitoring framework of the adopted South Norfolk Local Plan documents: Development Management Policies Document (2015), Site Specific Allocations and Policies Document (2015), Wymondham Area Action Plan (2015) and Long Stratton Area Action Plan (2016).

This report relates to the Joint Core Strategy Annual Monitoring Report 2018-19 (JCS AMR) and is provided as an appendix to the AMR.

This report should be read in conjunction with the following documents:

- JCS AMR 2018/19
- Five Year Housing Land Supply Statement for Broadland, Norwich and South Norfolk
- Sustainability Appraisal Scoping Report for the Greater Norwich Joint Core Strategy 2011 (2014)

Overall, this Annual Monitoring Report concludes that the policies contained in the South Norfolk Local Plans continue to be applied consistently and are functioning as intended. In terms of ongoing monitoring, the data compiled in 2018/19 highlights the need to monitor the A1 units within the identified Primary Shopping Areas. It has not been possible to compile data for all of the identified monitoring indicators. This is in part due to relevant applications not having been assessed and determined within the current monitoring period. Further monitoring of the South Norfolk Local Plans in future years will continue to assess the effectiveness of the policies contained in these documents.

Introduction

The Annual Monitoring Report (AMR) produced by the Greater Norwich Development Partnership (GNDP) updates the monitoring framework of the Joint Core Strategy (JCS) since the base date of the plan (2008) and provides a useful indication of how the GNDP area is currently performing in terms of meeting its overall objectives.

This report monitors those documents set out above that relate specifically to the South Norfolk administrative area. Where appropriate, and to avoid duplication, this report will direct the reader to either the main 2018/19 AMR produced by the GNDP or earlier AMRs.

The monitoring data in this report refers to the individual strategic policies set out in the South Norfolk Local Plan. Monitoring of these policies seeks to ensure that the plan is meeting its specified objectives.

Policy DM1.2 - Requirement for infrastructure through planning obligations		
Indicator	Target	Comments
<p>Number of planning obligations secured for: affordable housing, GI, open space/ play space and pedestrian and highways improvements</p> <p>The number/ percentage of obligations secured not confirming to full policy position</p>	<p>No targets identified</p> <p>Target to minimise</p>	<p>A total of 31 agreements were entered into during the monitoring period:</p> <p>4 no. S106 agreements 7 no. Affordable Housing agreements 11 no. Supplemental Affordable Housing agreements 9 no. Deeds of Variation</p> <p>Of the S106 agreements, three provided for both affordable housing and the delivery of open space whilst the fourth related to car parking facilities at the Norfolk and Norwich University Hospital (2016/2382). Details of the 3 relevant agreements are set out below:</p> <p><i>2017/0099 (Rockland St Mary)</i> NOTE: Affordable housing was secured at 24% and therefore failed to meet the policy requirement for the delivery of 33% affordable housing. The developer submitted viability calculations demonstrating that the delivery of 6 or more affordable dwellings on this site would be unviable. This was found to be acceptable by the District Valuer.</p> <p><i>2017/0225 (Tacolneston)</i> Policy compliant</p> <p><i>2018/0121 (Ditchingham)</i> Policy compliant</p> <p><u>Analysis:</u> A significantly lower number of planning obligations were entered into within this monitoring</p>

		<p>period than in previous years however a review of the 2018/19 obligations indicates that infrastructure continues to be secured in accordance with the policy requirements, unless an alternative position could be robustly evidenced.</p> <p>It can therefore be considered that the policy is working as intended and planning decisions are being made in accordance with the policy requirements.</p>																		
Policy DM1.3 - The sustainable location of new development																				
<p>Number of planning permissions / units granted outside development boundaries as a percentage of the overall applications/ units</p>	<p>Target to minimise</p>	<p>Number of <u>new planning permissions</u> granted inside/ outside Development Boundaries between 01/04/18 and 31/03/19:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">OUT</td> <td style="width: 30%; text-align: center;">90</td> <td style="width: 40%; text-align: right;">57%</td> </tr> <tr> <td>IN</td> <td style="text-align: center;">67</td> <td style="text-align: right;">43%</td> </tr> <tr> <td>TOTAL</td> <td style="text-align: center;">157</td> <td style="text-align: right;">100%</td> </tr> </table> <p>Number of <u>new units</u> granted inside/outside Development Boundaries between 01/04/18 and 31/03/19:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">OUT</td> <td style="width: 30%; text-align: center;">178</td> <td style="width: 40%; text-align: right;">44%</td> </tr> <tr> <td>IN</td> <td style="text-align: center;">231</td> <td style="text-align: right;">56%</td> </tr> <tr> <td>TOTAL</td> <td style="text-align: center;">409</td> <td style="text-align: right;">100%</td> </tr> </table> <p><u>Analysis:</u> The above figures have been sourced from the Council's Residential Land Availability Study.</p> <p>The 2018/19 figures reflect the position regarding the 5-year land supply and represent a 6% increase in the number of planning permissions approved outside development boundaries compared with the 2017/18</p>	OUT	90	57%	IN	67	43%	TOTAL	157	100%	OUT	178	44%	IN	231	56%	TOTAL	409	100%
OUT	90	57%																		
IN	67	43%																		
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		<p>figures. The percentage of units approved outside development limits is greater than in 2017/18 reflecting the larger number of small sites approved outside development boundaries in this period, as well as the overall lower number of units approved throughout the District (i.e. no large-scale development on allocated sites). The overall number of units benefitting from planning permission contrary to planning policy (in terms of location) is similar to those approved in previous years.</p> <p>Overall, the evidence suggests that the policy targets continue to be met despite the challenges of the 5-year land supply position during this monitoring period.</p>
Policy DM1.4 - Environmental quality and local distinctiveness		
Number of buildings re-used or converted	Target to maximise	<p>During the monitoring period a total of 16 planning applications were submitted for the re-use or conversion of existing buildings. Of these, one application was withdrawn and two applications were refused planning permission. The submitted applications are listed below.</p> <p>Approved</p> <p>2018/2265 The Heywood 2018/2233 Fersfield 2018/1945 Costessey 2018/2759 Intwood 2018/2194 Swainsthorpe 2018/0921 Wymondham 2018/1018 Bressingham 2018/2087 Bunwell 2018/2287 Costessey</p>

		<p>2018/0663 Wymondham 2018/2461 Bunwell 2018/1829 Mulbarton 2018/0855 Barford</p> <p>The majority of these applications were for the conversion of existing buildings to residential use, including former agricultural buildings, garages and former nissen huts. Planning permission was also granted for the change of use of a group of buildings from a café and offices to D1 use.</p> <p>Withdrawn 2018/1275 Welborne</p> <p>Refused 2018/0636 Starston 2018/2427 Crownthorpe</p> <p>The above applications were refused and these decisions subsequently upheld by Planning Inspectors at Appeal. Both schemes sought consent for residential use however both were considered to be in unsustainable locations and therefore inappropriate for the proposed use.</p> <p><u>Analysis:</u> The number of applications submitted in the monitoring period was similar to those in previous years, as too was the number of successful applications. The evidence suggests that the policy is being applied consistently and the Appeal decisions reinforce that the policy is being applied appropriately.</p>
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Sustainable and renewable energy capacity permitted by type	Year on year megawatts capacity increase	<p>This indicator is monitored as part of the JCS objectives. Details relating to this indicator can be found in Objective 1 in the GNDP AMR.</p> <p>(It should also be noted that many renewable energy schemes are permitted development and consequently the effect of this policy is limited in these cases. Other proposals incorporate renewable energy into the overall schemes and may therefore prove difficult to monitor.)</p>
Policy DM1.5 - Existing commitments		
Percentage of renewal applications on committed or allocated sites in the Local Plan	Target of 100%	<p>Previous monitoring reports have included tables setting out both the existing committed and allocated sites, as well their current planning status however the following list is considered to better meet the requirements of the monitoring indicator.</p> <p>Two applications were submitted for consideration against this policy in the current monitoring period (2018/0280 & 2018/0281), both seeking consent for residential development on a committed site in Cringleford. Application 2018/0280 was refused as being out of character with the area and impacting on residential amenity; however a revised application has been submitted outside of the monitoring period. 2018/0281 remains undetermined and it will therefore be included within the assessment in forthcoming years.</p> <p><u>Analysis:</u> Due to the lack of applications submitted for consideration against this policy during the current monitoring period it is not possible to provide an</p>

		assessment of the effectiveness of this policy at this time.						
Policy DM2.1 - Employment and business development								
Permitted amount of floorspace and land by employment type	Target to maximise	This indicator is usually monitored as part of the JCS objectives however it has not been possible to monitor this data in the 2018/19 monitoring period. If possible, a backdated position relating to this dataset will be published in the future.						
Policy DM2.2 - Protection of employment sites								
Loss of employment land (m ²) to non-employment use / other uses	Target to minimise	<p>Two applications were approved in the monitoring period that resulted in the loss of existing employment land:</p> <table border="0"> <tr> <td>2018/2717</td> <td>Tasburgh</td> <td>sui generis - C3 use</td> </tr> <tr> <td>2018/0855</td> <td>Barford</td> <td>sui generis - C3 use</td> </tr> </table> <p>Both of the above applications resulted in the loss of sui generis employment land to residential use. Application 2018/2717 renewed an existing planning permission allowing the change of use of a redundant petrol filling station. Use of the land ceased in 2011 and the site had been unsuccessfully marketed for employment use. Similarly, the land at Barford had previously been in use as a haulage yard but operations had ceased on the site in 2017. A period of unsuccessful marketing followed.</p> <p><u>Analysis:</u> Some changes of use may be undertaken as permitted development and as such the effects of this policy would be limited in these cases. However, on the basis of the applications recorded against this</p>	2018/2717	Tasburgh	sui generis - C3 use	2018/0855	Barford	sui generis - C3 use
2018/2717	Tasburgh	sui generis - C3 use						
2018/0855	Barford	sui generis - C3 use						

		policy it is considered that it is working effectively and as intended with sites that have been subject to the required marketing being put forward for development.																				
Policy DM2.4 - Location of the main town centre uses																						
Percentage of completed town centre uses in identified centres and strategic growth centres	Target of 100%	This indicator is monitored as part of the JCS objectives. Details relating to this indicator can be found in Objective 3 in the GNDP AMR.																				
Policy DM2.5 - Changes of use in Town Centres and Local Centres																						
Percentage of ground floor units available for Class A1 use in the defined Primary Shopping Areas (PSA) of Diss and Harleston	Minimum of 60% of ground floor units available for Class A1 uses in the Primary Shopping Areas	Town centre surveys were undertaken in June 2018 (A), November 2018 (B) and February 2019 (C) in Diss and Harleston. As in previous years, obtaining data on a quarterly basis has not been possible in the 2018/19 monitoring period. A summary of the results of the monitoring exercise for both the Primary Shopping Areas and the defined Town Centre Areas is set out below:																				
Percentage of ground floor non-residential units being available for Class A1 use in the defined Town Centre Area (TCA) of	Minimum of 50% of ground floor non-residential units to be available for Class A1 shop use in the defined Town Centre Area	<p>Primary Shopping Area (PSA)</p> <table border="1"> <thead> <tr> <th></th> <th>(A)</th> <th>(B)</th> <th>(C)</th> </tr> </thead> <tbody> <tr> <td><i>Diss</i></td> <td>61%</td> <td>59%</td> <td>59%</td> </tr> <tr> <td><i>Harleston</i></td> <td>73%</td> <td>73%</td> <td>73%</td> </tr> </tbody> </table> <p>Town Centre Areas (TCA)</p> <table border="1"> <thead> <tr> <th></th> <th>(A)</th> <th>(B)</th> <th>(C)</th> </tr> </thead> <tbody> <tr> <td><i>Diss</i></td> <td>58%</td> <td>59%</td> <td>59%</td> </tr> </tbody> </table>		(A)	(B)	(C)	<i>Diss</i>	61%	59%	59%	<i>Harleston</i>	73%	73%	73%		(A)	(B)	(C)	<i>Diss</i>	58%	59%	59%
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	(A)	(B)	(C)																			
<i>Diss</i>	58%	59%	59%																			

Diss and Harleston		<p><i>Harleston</i> 61% 59% 59%</p> <p><u>Analysis:</u> The above evidence suggests that Policy DM2.5 is working as intended although a slight decrease in the number of ground floor units available for A1 use in the Diss PSA has been experienced. This has resulted in the percentage of available units falling below the required target however the decrease is minimal and continued monitoring of this figure and liaison with Development Management Officers will seek to address this in the future. Future applications for the loss of A1 units in this area will need to be carefully balanced, considering the proposed use and its benefits against vacant units in the PSA. Analysis of the TCA figures indicates that these targets are being comfortably exceeded.</p>
Policy DM2.8 - Equestrian and other changes of use of agricultural land		
Amount of equestrian and other small based rural development by location	No specified target	<p>A total of 25 planning applications were coded against this policy in the 2018/19 monitoring period. This is a decrease in the number of applications received in the 2017/18 period but a similar figure to earlier years. One application was refused planning permission.</p> <p><u>Analysis:</u> Of the submitted applications, 12 were for the use of land for equestrian uses, 9 for the change of use to residential land and 4 were for 'other' uses including dog exercising areas and tourism uses. As the proposed and approved uses were similar in both type and number to those submitted in previous years it can be concluded that the policy continues to be applied consistently and work as intended.</p>
Policy DM2.9 - Rural tourist and other recreational destinations		

Amount of tourist related development	No specified target	<p>Ten planning applications were determined against this policy during this monitoring period. Of these six related to new proposals whilst four sought consent for the expansion (or alteration) of existing facilities. Application 2018/1981 at Broome was refused consent. This application was for the change of use of land for the standing of 32 mobile homes and was refused for a number of reasons including being sited within Flood Zone 3b, having a detrimental impact on the local and natural environment and the impact it would have on existing local residents. All other applications were granted planning consent.</p> <p><u>Analysis:</u> The number of applications received (and approved) for rural tourist/ recreational destinations was similar to those recorded in previous monitoring years. The range of uses approved varied and included holiday accommodation, leisure uses and sporting facilities. These applications do not raise any concerns and as such it is considered that the policy is being applied consistently and is working as intended.</p>
Policy DM3.1 - Meeting Housing Requirements and Needs		
New house completions by bedroom number based on the proportions set out in the most recent Sub-Regional Housing Market Assessment	Figures within 10% tolerance of the Housing Market Assessment requirements	This indicator is monitored as part of the JCS objectives. Details relating to this indicator can be found in Objective 2 in the GNDP AMR.

Policy DM3.2 - Meeting Rural Housing Needs										
Number of affordable homes built in the countryside	No specified target	<p>A total of 63 affordable homes were completed in settlements with a population of less than 3,000 during the monitoring period.</p> <table border="0"> <tr> <td>Loddon</td> <td>38</td> </tr> <tr> <td>Little Melton</td> <td>2</td> </tr> <tr> <td>Stoke Holy Cross</td> <td>3</td> </tr> <tr> <td>Framingham Earl</td> <td>20</td> </tr> </table> <p><u>Analysis:</u> The number of affordable homes delivered in 2018/19 was the same as the figure in the previous monitoring period. Previously an uplift had been reflected in the number of units being delivered against this policy. The earlier positive uplift in numbers combined with the continued delivery of affordable homes at a constant level indicates that the policy is working as intended.</p>	Loddon	38	Little Melton	2	Stoke Holy Cross	3	Framingham Earl	20
Loddon	38									
Little Melton	2									
Stoke Holy Cross	3									
Framingham Earl	20									
Policy DM3.3 - Sites for Gypsies and Travellers										
Number of permanent pitches provided	To meet GT Norwich GTAA targets: 18 pitches in total (8 from 2015-18; further 10 to 2026)	<p>This indicator has been updated to reflect the most recently available needs assessment.</p> <p>This indicator is monitored as part of the JCS objectives. Details relating to this indicator can be found in Objective 2 in the GNDP AMR.</p>								
Policy DM3.10 - Promotion of sustainable transport										
Amount of land protected for future transport	No specified target	As in previous years, monitoring of applications has not identified any land protected for the future transport improvements. A number of schemes are								

improvements (ha)		<p>mentioned as policy requirements in allocated sites through the Site Specific Allocations and Policies document, Wymondham Area Action Plan and Long Stratton Area Action Plan and the Council will seek to protect any land considered necessary to fulfil these requirements.</p> <p>An application is currently under consideration by South Norfolk Council for the Long Stratton bypass; at the time of preparing this report the application remains undetermined (2018/0112).</p> <p>Outline planning approval was granted during the monitoring period for employment development at Keswick. The scheme includes a new link road between the A140 and the B1113 (2017/2794).</p> <p><u>Analysis:</u> A review of planning decision issued during this timeframe has not indicated any applications submitted (or approvals granted) contrary to the requirements of this policy. It may therefore be considered that this policy is functioning as intended.</p>
Policy DM3.12 - Provision of vehicle parking		
Number of major applications permitted in accordance with the Council's car parking standard	Target to maximise	<p>The Council's vehicle parking standards remain the Norfolk County Council 'Parking Standards for Norfolk 2007'. As in previous years for the purpose of monitoring it has been assumed that an application meets the above standards unless the NCC Highways consultation response suggests otherwise.</p> <p>Within the 2018/19 monitoring period a total of 24 major applications were determined (excluding variation of condition application unless they</p>

		<p>specifically relate to either highways/ parking). Of these applications 4 were refused but as none of the reasons for refusal related to highways/ parking it may be assumed that these aspects of the proposals were policy compliant. Those applications which did result in a highways comment relating to the parking provision were subsequently amended and the comments addressed to the satisfaction of the authority.</p> <p><u>Analysis:</u> A review of the consultation comments submitted by the Highways Authority in response to proposals received, as well as any subsequent amendments to the schemes, has not raised any concerns about the application or consistent use of this policy.</p>
Policy DM3.14 - Pollution, Health and Safety		
Number of Air Quality Management Area designations	Target to minimise	SNC currently does not have any Air Quality Management Areas so is meeting the target to minimise as set out in the Monitoring Framework. This indicator is also monitored for the GNDP AMR as part of the JCS objectives.
Policy DM3.16 - Improving the level of community facilities		
Number of applications approved that involved the change of use of a community facility	Target to minimise	<p>During the 2018/19 monitoring period a total of 3 applications were submitted that would result in the loss of a community facilities.</p> <p>Approved 2018/0906 Bergh Apton</p> <p>Refused</p>

		<p>2018/2715 Barford 2018/0043 Tacolneston (Appeal in Progress)</p> <p>Application 2018/0906 permitted the change of use of an existing arts centre to a holiday let. The assessment of this proposal concluded that due to the relocation of the arts centre into a larger premises and the niche nature of the facility, the development would not result in the loss of an essential community facility. The refused applications related to the change of use of (part of) public houses to residential use with the reasons for refusal relating specifically to the loss of community facilities.</p> <p><u>Analysis:</u> The number of approved schemes has reduced to one and the proposal was considered to meet the requirements of the policy for the reason set out above. Monitoring of this policy suggests it is working as intended with a minimal loss of existing community facilities.</p>				
Policy DM4.1 - Renewable Energy						
Sustainable and renewable energy capacity permitted by type	Year on year megawatts capacity permitted increase	This indicator is monitored as part of the JCS objectives. Details relating to this indicator can be found in Objective 1 in the GNDP AMR.				
Policy DM4.3 - Facilities for the collection of recycling and waste						
Percentage of household waste that is a)	Year on year increase	<p>Figures for this monitoring period are set out below:</p> <table> <tr> <td>Recycled Household Waste</td> <td>41%</td> </tr> <tr> <td>Composted</td> <td>19%</td> </tr> </table>	Recycled Household Waste	41%	Composted	19%
Recycled Household Waste	41%					
Composted	19%					

recycled and b) composted		<p>These figures are similar to those for 2017/18, and therefore represent a slight decrease in the overall totals of waste recycled and composted. This has been attributed in part to the higher proportion of waste being rejected at Materials Recycling Facilities, a trend which was noted within the wider geographical area.</p>															
<p>Policy DM4.4 - Natural environmental assets - designated and locally important open space</p>																	
<p>Hectares of development in highly sensitive landscapes (SSSI, SAC, SPA, CWS, River Valleys, Important Open Local Spaces)</p>	<p>No specified target</p>	<p>As with previous years the majority of applications determined against this policy related to ecology/ biodiversity strategies however an increased number of applications affecting designated landscapes were received within this monitoring period (a total of 10 applications compared with 4 in the previous year). Of these, 5 planning applications were refused, 4 of which were determined to have a harmful impact on the designated spaces identified. An assessment of the fifth application found that the land within the designated CWS was already in domestic use and therefore the use proposed would not result in any additional harm to the site.</p> <p>Approved</p> <table border="0"> <tr> <td>2018/2037</td> <td>Costessey</td> <td>River Wensum SSSI</td> </tr> <tr> <td>2017/2794</td> <td>Keswick</td> <td>Depot Meadow CWS</td> </tr> <tr> <td>2017/1082</td> <td>Trowse</td> <td>Trowse Meadow CWS</td> </tr> <tr> <td>2018/2806</td> <td>Gissing</td> <td>Shelfhanger SSSI</td> </tr> <tr> <td>2018/0542</td> <td>Hingham</td> <td>Sea Mere SSSI</td> </tr> </table> <p>Refused</p>	2018/2037	Costessey	River Wensum SSSI	2017/2794	Keswick	Depot Meadow CWS	2017/1082	Trowse	Trowse Meadow CWS	2018/2806	Gissing	Shelfhanger SSSI	2018/0542	Hingham	Sea Mere SSSI
2018/2037	Costessey	River Wensum SSSI															
2017/2794	Keswick	Depot Meadow CWS															
2017/1082	Trowse	Trowse Meadow CWS															
2018/2806	Gissing	Shelfhanger SSSI															
2018/0542	Hingham	Sea Mere SSSI															

		<p>2018/2402 Costessey Important Local Open Space</p> <p>2018/0831 Cringleford Softley Drive Meadow CWS</p> <p>2018/1492 Cringleford Softley Drive Meadow CWS</p> <p>2018/2302 Ashwellthorpe Lower Wood SSSI & CWS (Appeal in Progress)</p> <p>2018/0114 Bawburgh Yare Valley CWS</p> <p><u>Analysis:</u> The number of applications submitted that would potentially impact upon designated landscapes has increased, however the number of applications approved in 2018/19 was similar to those in previous years. The reasons for refusal show clear consideration of the impact that development in these locations would have on the sensitive landscapes, in accordance with the requirements of the policy. Those applications that were approved were concluded to be acceptable therefore it may be considered that this policy continues to be successfully implemented and work as intended.</p>
Policy DM4.6 Landscape setting of Norwich		
Amount of Norwich Southern Bypass Landscape Protection Zone lost to development (ha)	Target to minimise	A total of 10 applications were coded against this policy in 2018/19, compared to 4 applications in 2017/18. Of these however, four applications related to the same site (albeit different proposals), and therefore the overall number of applications submitted may be considered as being similar to those in previous years. With the exception of one scheme (2018/0114), all of the submitted applications were approved.

		<p>Approved 2018/0939 Colney 2018/1857 Colney 2018/0670 Colney 2017/2794 Keswick 2017/1082 Trowse 2018/0101 Bawburgh 2018/2643 Colney 2018/0351 Colney 2018/1735 Little Melton</p> <p>Refused 2018/0114 Bawburgh</p> <p>The assessment of these applications concludes that the proposals would not result in significant erosion of the Norwich Southern Bypass Landscape Protection Zone due to existing site uses, and both the proposed and existing landscaping schemes. Outside of this monitoring period, an earlier application at the Keswick employment site was refused planning permission due to its impact on the NSBLPZ (2016/0764) however the amended scheme (2017/2794) addressed these concerns with an amended design which reduced the bulk, scale and massing of the proposed development, and also included an improved landscaping scheme. These alterations were considered to sufficiently mitigate the concerns previously raised. The refused scheme (2018/0114) was determined to have a harmful impact on the NSBLPZ and was therefore found to be unacceptable.</p> <p><u>Analysis:</u> Overall the above assessments demonstrate that whilst planning permissions have been granted</p>
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		<p>within this zone, the proposals have been robustly assessed for their impact on the NSBLPZ and have been found to be acceptable for the reasons set out above. It may be concluded therefore that the policy continues to be applied consistently and perform as intended.</p>
<p>Policy DM4.7 - Strategic Gap between settlements in the Norwich Policy Area</p>		
<p>Amount of Strategic Gap lost to development (ha)</p>	<p>Target to minimise</p>	<p>A total of 5 applications were determined in accordance with this policy in the 2018/19 monitoring period. Of these, three were for new dwellings and two sought reserved matters consent for approved schemes (the RM applications have been excluded from the details below as they relate to schemes previously considered). One application was refused planning permission.</p> <p>Approved 2018/0091 Hethersett 2017/2490 Wymondham</p> <p>Refused 2018/0694 Wymondham</p> <p>All applications sought consent for single dwellings on sites within the designated Strategic Gap. The approved schemes were not considered to be harmful to the Strategic Gap due to existing extensive vegetation on the sites providing adequate screening to prevent erosion of the gap. The refused scheme was also considered to be acceptable in terms of its impact on the Strategic Gap but was refused for other reasons.</p>

		<p><u>Analysis:</u> The policy does not restrict development in the Strategic Gap; rather it seeks to ensure that the openness of the gap is not eroded by development. Based upon the above assessments it may be considered that the policy is functioning as intended as the impact of the approved schemes on the openness of the Strategic Gap was found to be acceptable.</p>
Policy DM4.8 - Protection of trees and hedgerows		
Number and area of trees protected by Tree Preservation Orders served	Target to maximise	<p>A total of 12 Tree Preservation Orders were served during the monitoring period, out of a possible total of 17 TPOs throughout the 2018/19 period. This represents a significant reduction in the numbers reported in previous years however it is considered likely these greater figures related, in part, to the coverage of wider areas by the TPOs that were served. It is also possible that the earlier figures were erroneously over-reported owing to the method of data retrieval.</p> <p><u>Analysis:</u> Due to the possible inconsistencies in previous years reporting it is difficult to establish whether the policy target has been met in the current monitoring year; however, the 2018/19 figures may be used as a robust basis for future comparisons. In the meantime, it is clear that TPOs continue to be served in accordance with the requirements of this policy and therefore in this respect it may be considered that the policy is functioning as intended.</p>
Policy DM4.10 - Heritage Assets		

Percentage of Listed Building consents granted	Target to maximise	<p>Listed Building consents During the monitoring period 2018/19 a total of 162 listed building applications were coded against this policy. Of these, one application was withdrawn and two were refused listed building consent.</p> <p>The refused schemes comprised the replacement of windows and the addition of an entrance porch at a Taylor and Green property (2018/2181) and the partial demolition as well as internal and external alterations to a public house (2018/1977). In both instances it was considered that the proposed works would result in harm to the special interest and historic significance of the listed buildings. In the case of the works to the public house it was also considered that there was no clear justification for the works proposed and that there would be no overriding public benefit resulting.</p>
Percentage of Conservation Areas with appraisals	Target to maximise (until all are completed)	<p>Conservation Area Appraisals This indicator is monitored as part of the JCS objectives. Details relating to this indicator can be found in Objective 8 in the GNDP AMR.</p> <p>(New Conservation Area Appraisals adopted during the monitoring period were: Bramerton, Brockdish, Scole, Shotesham and Mulbarton).</p>
Number of Listed Buildings lost/ demolished	None	<p>Listed Building lost/ demolished This indicator is monitored as part of the JCS objectives. Details relating to this indicator can be found in Objective 9 in the GNDP AMR.</p> <p><u>Analysis:</u> A similar number of Listed Building applications were submitted in 2018/19 compared to</p>

		<p>previous monitoring periods, reflecting the consistent level of Listed Building stock within the District. The previous figure of 100% of consents being granted has not been achieved in the current monitoring period however the reasons for refusal in those decisions detailed above are clear and consistent. Neither application was subject to a Planning Appeal. It may therefore be considered that the policy continues to be applied consistently and is performing as intended.</p>
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Conclusion

As in previous years it may be concluded that the policies in the South Norfolk Development Management Policies document continue to function as intended. The above analysis illustrates the consistent application of these planning policies by Planning Officers between monitoring periods. Furthermore, an assessment of those decisions that apparently conflict with policy requirements confirm that these decisions are robust and have been appropriately evidenced and/or justified.

Monitoring of the DM policy 2.5 has highlighted the marginal decrease in A1 units within the identified town centres. This will be addressed by implementing the intended programme of regular monitoring and ensuring this information is reported to those Planning Officers determining relevant applications within a timely manner.

Compilation of the 2018/19 has suggested that the previous reporting against Policy DM4.8 may have been incorrect due to the method of calculation however the 2018/19 figure provides a robust baseline figure for future monitoring.

Updates made in 2016/17 to several the monitoring indicators mean that it is now possible to make a clear comparison between the 2016/17 baseline data and the current position. This provides an opportunity to assess the effectiveness of the individual policies in this plan and build a robust picture of how the policies are being applied.

The details set out in this Annual Monitoring Report do not raise any significant issues that require specific monitoring or action in the forthcoming months.

Site Specific Allocations and Policies

1. This section monitors the Strategic Principles from the South Norfolk Site Specific Allocations and Policies Document for the period 01/04/18 to 31/03/19 and reflects the indicators shown in the Monitoring Framework which accompanies the plan.
2. The delivery of housing and employment land, as well as 5-year land supply, is already monitored and reported as part of the Joint Core Strategy Annual Monitoring Report.
3. (Please note - there were errata in the original Monitoring Framework included at the start of the Site Specific Allocations and Policies document. The references below refer to Poringland refer to the correct policy numbers.)

Strategic Principle SP1: To allocate the appropriate sites for housing and affordable housing, in the most sustainable locations, within the most sustainable settlements to meet the Joint Core Strategy requirements.

Monitoring indicator and target 1: Enhancing/providing facilities as part of new development (i.e., schools, village halls, retail, housing with care, open space) as per the requirements set out in the site policies, with a target if 100% requirements met.

Monitoring indicator and target 2: Provision of affordable housing in accordance with JCS Policy 4.

Monitoring indicator and target 3: Planning applications made in accordance with numbers allocated in site policies, with a target of minimum allocations met or exceeded.

Monitoring indicator and target 1 (Community facilities)

Policy/ Site/ Application Reference	Policy Requirement	Secured via S106/condition	Delivery
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EAS1/ Land south and east of Easton (App Ref: 2014/2611/O)	<ul style="list-style-type: none"> - Village Centre - Expanded primary school - Protection of allotments & existing community use sites 	<ul style="list-style-type: none"> - Play areas for each phase - Village centre - Allotments - School expansion 	Development not yet started
EAS2/ Easton gymnastics facility (App Ref: 2014/2069/F)	<ul style="list-style-type: none"> - New gymnastics facility 	<ul style="list-style-type: none"> - New gymnastics facility 	Development complete
COS1/ Land west of Lodge Farm, Dereham Rd (App Ref: 2013/0567/F; 2016/0402/F)	<ul style="list-style-type: none"> - Single form entry primary school 	<ul style="list-style-type: none"> - Primary school - Sports pavilion & car parking - Local shop site - 5 equipped play areas 	Development commenced
HET1/ Land north of Hethersett (App Refs: 2011/1804/O; 2015/1594/D; 2015/1681/D)	<ul style="list-style-type: none"> - Expansion of local schools (or provision of land for the same) - Community facilities (e.g., open space, community buildings) 	<ul style="list-style-type: none"> - Primary school site (plus contingency land) - Secondary school site (plus contingency land) - Financial contributions towards education 	Development commenced

		<ul style="list-style-type: none"> - Community pavilion - Neighbourhood centre - Play areas and recreational open space in each phase - Allotments 	
HET2/ Land north of Grove Road	- Housing with care		No planning permission as at 31/03/19
HET4/ Land north of Great Melton Rd (App Ref: 2012/1814/F)	- Contribution towards local schools' expansion	<ul style="list-style-type: none"> - Financial contributions towards education and recreational space - Play space 	Development complete
COL2/ Land rear/east of Institute of Food Research (App Refs: 2012/2113/F; 2017/1422/F)	- Uses ancillary/complimentary to development of the Science Park	- Temporary use of land as a car park (until 2027)	Site in use
DIS6/ Former Hamlins Factory site, Park Rd (App Ref: 2012/1493/D)	<ul style="list-style-type: none"> - Retail use limited to non-food goods - Office development restricted to A2 use 	- Pub/restaurant on part of the site	Development of pub/restaurant complete

DIS7/ Feather Mills site, Park Road	<ul style="list-style-type: none"> - Retail use limited to non-food goods - Office development restricted to A2 use 		No planning permission as at 31/03/19
HAR5/ Land off Station Hill	<ul style="list-style-type: none"> - Food store 		No planning permission as at 31/03/19
POR1/ Land at Heath Farm (App Refs: 2013/1986/O; 2014/0732/D; 2016/2388/F)	<ul style="list-style-type: none"> - Open space 	<ul style="list-style-type: none"> - Play areas & recreational open space - Transport contribution (Fiveways) - Nursery education contribution - Primary education contribution - Secondary education contribution 	Development largely complete
POR4/ Land south of Stoke Rd (App Ref: 2010/1332/F)	<ul style="list-style-type: none"> - Open space at POR5 (in full or in conjunction with POR6) 	<ul style="list-style-type: none"> - Education contribution - Multi Use Games Area - Play areas & recreational open space 	Development commenced
POR5/ Land south of Heath Loke	<ul style="list-style-type: none"> - Play areas & recreational open space 		No planning permission as at 31/03/19

<p>POR6/ Land north of Shotesham Rd and east of Carr Lane</p> <p>(App Refs: 2011/0476/O; 2014/0393/D; 2014/0319/D)</p>	<p>- Open space at POR5 (in full or in conjunction with POR4)</p>	<p>- Education contribution - Multi Use Games Area - Play areas & recreational open space</p>	<p>Development commenced</p>
<p>TROW1/ Land on White Horse Lane and to the rear of Charolais Close and Devon Way</p> <p>(App Refs: 2013/0463/O; 2016/0803/D; 2016/0805/D; 2014/0981/O)</p>	<p>- Primary school site</p>	<p>- Primary school site - Education contribution - Play areas & recreational open space - Multi Use Games Area</p>	<p>Development commenced</p>
<p>TROW2/ Land north of A146 & east of A47</p>	<p>- Park and Ride site</p>		<p>No planning permission as at 31/03/19</p>
<p>LOD1/ Land north of George Lane</p> <p>(App Refs: 2013/1647/O; 2016/0853/D)</p>	<p>- Recreational open space - Site for provision of infrastructure</p>	<p>- Education contribution - Play areas & recreational open space</p>	<p>Development commenced</p>
<p>STO1/ Land south of Stoke Holy Cross Primary School</p>	<p>- Expansion and improvement of existing primary school facilities</p>	<p>- Play areas & recreational open space - Community payment</p>	<p>Development commenced</p>

(App Refs: 2012/2034/F; 2014/1874/F; 2016/2153/F)	- Open space	- Car park contribution - Land for school expansion	
TAS1/ Land north of Church Rd and west of Tasburgh school	- Expansion or improvement of the existing primary school facilities		No planning permission as at 31/03/19
WOR1/ Land at the junction of High Rd and Low Rd	- Recreational open space on land adjacent to the site		No planning permission as at 31/03/19

Analysis: The above table summarises the policy requirements for allocated sites as well as the secured infrastructure (or contributions) where known. A review of the details secured indicates that the policy requirements are being met therefore at this stage it can continue to be reported that the policy has been effective in securing appropriate agreements and/or conditions on allocated sites with permission. As sites are completed it will be possible to monitor the delivery of these contributions.

Monitoring indicator and target 2 (Affordable housing)			
Site Address/ Reference	Total Dwellings	Affordable Homes	Percentage
<i>Sites 5 - 9 dwellings (20%)</i>			
Bressingham 2018/1018	5	0	0%
Chedgrave 2018/1792	5	0	0%
Cringleford 2018/0735	6	0	0%
Diss 2018/1765	8	0	0%

Pulham St. Mary 2018/1212	7	2	29%
Swainsthorpe 2017/1177	5	0	0%
Wymondham 2018/0669	8	0	0%
Wymondham 2018/1744	5	0	0%
<i>Sites 10 - 15 dwellings (30%)</i>			
Wymondham 2018/1528	10	0	0%
<i>Sites 16+ dwellings (33%)</i>			
Stoke Holy Cross 2016/2153	53	17	32%
Thurlton 2017/2302	30	10	33%
Wymondham 2016/2309	30	0	0%

4. The above table shows applications granted planning consent between 1 April 2018 and 31 March 2019, detailing the total number of dwellings on each site, the number of affordable homes secured as well as the overall percentage of affordable housing. To reflect previous year's data collection, as well as the requirements of the monitoring indicator, the table has been split to reflect the affordable housing percentages in the Joint Core Strategy: Policy 4 Housing Delivery. Amendments to paragraph 63 of the National Planning Policy Framework during the monitoring period have impacted on the delivery of affordable housing on sites of less than 10 dwellings. For the medium sized sites, a financial appraisal submitted to support planning application 2018/1528 demonstrated that the delivery of affordable housing on this site would be unviable therefore a nil provision was accepted. In terms of the larger sites (16+ dwellings), the above table indicates that an average of 33% affordable housing was met on these sites. Overall, despite the lower delivery rates of affordable housing during the monitoring period the approved sites may be considered as being policy compliant.

Monitoring indicator and target 3 (Allocation numbers)				
<i>NORWICH POLICY AREA - Growth Locations</i>				
Allocation /Settlement	Total No. of Units Allocated	No. of Units with pp at 31/03/16	No. of Units with pp at 31/03/17	No. of Units with pp at 31/03/18
COS1 Costessey	500	495	509	509
EAS1 Easton	900	0	890	890
HET1 Hethersett	1080	1196	1196	1196
HET2 Hethersett	40	0	0	0
HET4 Hethersett	156	151	151	151
TOTAL	2676	1842 (69%)	2746 (102%)	2746 (102%)
<i>NORWICH POLICY AREA - Norwich Fringe</i>				
Allocation /Settlement	Total No. of Units Allocated	No. of Units with pp at 31/03/16	No. of Units with pp at 31/03/17	No. of Units with pp at 31/03/18
TROW1 Trowse	160	174	173	173
TOTAL	160	174 (109%)	173 (108%)	173 (108%)
<i>NORWICH POLICY AREA - Key Service Centres</i>				
Allocation /Settlement	Total No. of Units Allocated	No. of Units with pp at 31/03/16	No. of Units with pp at 31/03/17	No. of Units with pp at 31/03/18
POR1 Poringland	250	250	250	270
POR2 Poringland	100	100	100	100

POR4 Poringland	20	0	0	0
TOTAL	370	350 (95%)	350 (95%)	370 (100%)
<i>NORWICH POLICY AREA - Service Villages</i>				
Allocation /Settlement	Total No. of Units Allocated	No. of Units with pp at 31/03/16	No. of Units with pp at 31/03/17	No. of Units with pp at 31/03/18
BRA1 Bracon Ash	20	0	0	0
BRAM1 Bramerton	10	11	11	11
LIT1 Little Melton	20	20	20	20
MUL1 Mulbarton	180	180	180	180
NEW1 Newton Flotman	30	0	0	0
SPO1 Spooner Row	10	13	13	13
SPO2 Spooner Row	5	0	0	7
STO1 Stoke Holy Cross	100	53	106	106
SUR1 Surlingham	5	0	5	5
SUR2 Surlingham	5	0	2	2
SWA1 Swardeston	30	0	0	0
TAS1 Tasburgh	20	0	0	0
TOTAL	435	277 (64%)	336 (77%)	343 (79%)
<i>NORWICH POLICY AREA - Other Villages</i>				
Allocation /Settlement	Total No. of Units Allocated	No. of Units with pp at 31/03/16	No. of Units with pp at 31/03/17	No. of Units with pp at 31/03/18
BAW1 Bawburgh	5	5	5	5
KES1 Keswick	10	9	9	9
TOTAL	15	14 (93%)	14 (93%)	14 (93%)
<i>RURAL POLICY AREA - Main Towns</i>				

Allocation /Settlement	Total No. of Units Allocated	No. of Units with pp at 31/03/16	No. of Units with pp at 31/03/17	No. of Units with pp at 31/03/18
DIS1 Diss	35	0	0	0
DIS3 Diss	42	0	0	0
DIS4 Diss	125	0	0	136
DIS5 Diss	15	0	6	6
HAR1 Harleston	120	120	120	120
HAR3 Harleston	29	35	35	35
HAR4 Harleston	95	0	0	0
TOTAL	461	155 (34%)	161 (35%)	297 (64%)
<i>RURAL POLICY AREA - Key Service Centres</i>				
Allocation /Settlement	Total No. of Units Allocated	No. of Units with pp at 31/03/16	No. of Units with pp at 31/03/17	No. of Units with pp at 31/03/18
HIN1 Hingham	95	88	88	88
LOD1 Loddon	200	200	200	200
TOTAL	295	288 (98%)	288 (98%)	288 (98%)
<i>RURAL POLICY AREA - Service Villages</i>				
Allocation /Settlement	Total No. of Units Allocated	No. of Units with pp at 31/03/16	No. of Units with pp at 31/03/17	No. of Units with pp at 31/03/18
GRE1 Great Moulton	5	0	10	10
ALP1 Alington	10	10	10	10
ASL1 Aslacton	15	14	14	15
BAR1 Barford	10	0	0	0

BARN1 Barnham Broom	20	24	24	24
BER1 Bergh Apton	7	11	11	11
BER2 Bergh Apton	5	0	5	5
BKE1 Brooke	12	12	12	12
BKE2 Brooke	8	13	13	13
BRO1 Broome	5	0	0	0
BRO2 Broome	5	0	5	5
BUN1 Bunwell	8	0	8	7
BUN2 Bunwell	7	0	8	8
CAR1 Carleton Rode	5	0	0	3
CAR2 Carleton Rode	5	0	0	6
DIC1 Dickleburgh	20	0	0	22
DIT1 Ditchingham	20	0	0	0
EAR1 Earsham	20	0	0	0
GEL1 Geldeston	10	0	0	13
GIL1 Gillingham	10	0	0	0
HAL1 Hales	10	0	0	0
HEM1 Hempnall	20	0	0	0
PUL1 Pulham Market	10	0	10	10
ROC1 Rockland St Mary	20	0	0	21
SCO1 Scole	15	0	0	0
SEE1 Seething	10	0	5	5
TAC1 Tacolnaston	20	0	0	0
THL1 Thurlton	20	0	27	30
WIC1 Wicklewood	6	0	0	6
WIC2 Wicklewood	8	14	14	14
WOO1 Woodton	20	0	0	21
WOR1 Wortwell	5	0	0	0
WRE1 Wreningham	10	10	10	10
TOTAL	381	108 (28%)	186 (49%)	281 (74%)

Analysis: The figures in the table above illustrate the development pattern within the District. Larger sites allocated for development, particularly those within the Norwich Policy Area, were subject to planning applications in the earlier years of the plan period (some had already been submitted prior to the adoption of the Local Plan documents). As set out above this means that there have been minor

changes only during the current monitoring period in the numbers of approved dwellings on these sites. In contrast there has been a significant increase in the numbers of dwellings approved on sites within the Rural Policy Area, most notably within the Main Towns and the Service Villages. This reflects the availability of undeveloped allocated sites within these areas. The scale of development and the decreasing number of undeveloped sites indicates that the policy continues to be effective.

Strategic Principle SP2: To protect and allocate land for employment to promote economic growth and diversity for a wide range of jobs.

Monitoring indicator and target 1: Loss of allocated and permitted land, with a target to minimise.

Monitoring indicator and target 2: Take up of employment land allocations, with a target that all allocated employment land should be taken up by the end of the plan period.

Monitoring indicator and target 1 (Loss of allocated and permitted land)

This data is currently monitored against Policy DM2.1 (Employment and business development)

Monitoring indicator and target 2 (Take up of employment land allocations)

Allocation / Settlement	Allocated Site Area (Ha)	Amount of Available Land	Allocated Use
BKE3 Brooke	4.8		B1, B2, B8
COL1 Colney	39.4		B1(b)
COL2 Colney	3.7		B1(b)

COS3 Costessey	13.3		B1, B2, B8
HETHEL2 Hethel	20.0		Advanced engineering & technology
HIN2 Hingham	2.24		B1, B2, B8
KES2 Keswick	4.0		B1
LOD2 Loddon	1.1		B1, B2
LOD3 Loddon	1.84		B1, B2, B8
POR3 Poringland	4.3		B1
TROW2 Trowse	3.2		Park and Ride site
DIS6 Diss	1.76		Retail (non-food goods), leisure, offices (A2 only)
DIS7 Diss	2.21		Retail (non-food goods), leisure, offices (A2 only)
DIS8 Diss	2.89		B1
DIS9 Diss	4.22		B2, B8
HAR5 Harleston	1.23		B1, small-scale foodstore, health/community facilities
HAR6 Harleston	1.6		B1, B2
HAR7 Harleston	4.0		B1, B2, B8

Analysis: Data is not currently available for this monitoring period, but will be included in the 2019/20 AMR.

Strategic Principle SP3: To seek the appropriate re-use of previously developed land

Monitoring indicator and target: Permission granted on brownfield land, with a target of all allocated brownfield sites to be taken up by 2026.

Area	Nos. Permitted on Brownfield Allocations 2018/19	Nos. Permitted on Brownfield Commitments 2018/19	Nos. Permitted on Brownfield Windfalls 2018/19
NPA	0	0	23
RPA	0	0	46
TOTAL	0	0	69

5. The Council's Residential Land Availability data sets out the numbers of new dwellings on brownfield land within the monitoring period. These figures are subdivided into the above categories. As in recent years there have been no new schemes permitted on either brownfield allocation sites or brownfield commitment sites. The number of new dwellings permitted on brownfield windfall sites (69) was an increase in the figure from previous years (41 in 2017/18 and 51 in 2016/17) and represented 33% of the total number of units granted planning permission.

Allocation / Settlement	Planning Ref.	No. of Units on Site	Status
BRAM1 Bramerton	2013/1881	10	Complete
ASL1 Aslacton	2016/0171	14	Expired
BKE2 Brooke	2017/1128	13	Commenced
DIS5 Diss	2017/0042	6	Complete
DIS6 Diss	-	-	No permission
DIS7 Diss	-	-	No permission
HAR3 Harleston	2017/0099	33	Commenced

6. The take-up of allocated brownfield sites continues to be monitored and the delivery status of each of the sites updated in the above table. An earlier pending application for site allocation DIS6 (2017/2853) was refused planning consent in January 2019. Overall the data indicates a positive trend in the development of these sites, perhaps reflecting the earlier levels of development on allocated greenfield sites within the plan period.
7. In accordance with legislation the Council has published a brownfield register of previously developed land since December 2017. During this monitoring period there were a total of 23 sites on Part 1 of the published brownfield register. These

sites comprised both allocated sites and sites with existing planning permission. The Council did not publish a Part 2 register during this monitoring period.

Strategic Principle SP4: To avoid allocating land in flood zones 2 and 3

Monitoring indicator and target: Flood mitigation/ enhancement requirements identified in the site allocation policies, with a target of 100% of measures set out being agreed by the Environment Agency/ Anglian Water and secured by planning permission.

8. Previous Annual Monitoring Report datasets have set out at length the individual site allocation policy requirements, as well as the measures secured through planning condition on those sites benefiting from planning consent. It is not considered necessary to repeat the previously recorded information here. In the 2018/19 monitoring period there were no new planning consents granted on allocated sites with identified flood mitigation or enhancement requirements.

Strategic Principle SP5: To avoid allocating land that adversely impacts upon designated nationally and internationally protected sites for landscape for nature conservation value, such as SSSIs, Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar Sites and to positively enhance the natural environment and minimise the loss of undeveloped land.

The monitoring indicators and targets for Strategic Principle SP5 are set out under JCS Spatial Planning Objective 9 and are monitored for the GNDP AMR.

Strategic Principle SP6: To ensure that all site allocations identify, where possible, any infrastructure requirements.

Monitoring indicator and target: Infrastructure requirements identified in site policies are realised as follows: highways improvements, pedestrian/cycle links/improvements, water requirements with a target of 100% achieved.

9. The policy requirements for each site (highways improvements, pedestrian and cycle improvements) have been set out in detail in previous monitoring reports (most recently 2017/18) alongside a summary of the known infrastructure requirements secured by planning condition. Water requirements have been monitored separately under Strategic Principle SP4. It has previously been reported that the policy has effectively secured many appropriate conditions and contributions towards off-site highway schemes on sites with permissions and this has continued.
10. The following table sets out an updated position relating to new planning consents granted on allocated sites within the current monitoring period.

Allocation / Settlement	Planning Ref.	Policy Requirements	Planning Conditions
KES2 Keswick	2017/2794	<ul style="list-style-type: none"> • Access road from B1113 to A140 • Right turn junction into the site from the B1113 	<ul style="list-style-type: none"> • Improved cycle links • Junction improvements • Right turn from B1113

11. As may be seen from the above summary data, the approved scheme complied with the policy requirements for the site and secured the necessary highways improvements.

Strategic Principle SP7: To ensure that all allocated uses positively protect and enhance the individual character of the area.

Monitoring indicator and target: Green Infrastructure provision/ enhancements, protection of Heritage Assets, County Wildlife Sites and existing footpaths are realised in planning applications made on appropriate sites.

12. As reported above for Strategic Principles SP4 and SP6, detailed tables have previously recorded individual site/policy requirements as well as the planning status for each site.

Strategic Principle SP8: To ensure that site allocations are close to services so that people have ready access and minimal need to travel by car.

Monitoring indicator and target: Access to service and facilities by public transport, with a target to increase at each survey.

The monitoring indicator and target for Strategic Principle SP8 is set out under JCS Spatial Planning Objective 7 and is monitored for the GNDP AMR.

Conclusion

13. Generally, it may be concluded that the requirements of the policies within the Site Specific Allocations and Policies document are being met through the grant of planning permissions and the planning conditions that are being applied to those same planning consents. As the sites are developed and completed in future years there will be an opportunity to monitor the delivery of these policy requirements.

Long Stratton Area Action Plan

14. This section monitors the policies from the Long Stratton Area Action Plan for the period 01/04/18 to 31/03/19. These policies have now been monitored for two consecutive years, providing a baseline using the indicators. As with all policies, the effectiveness of the policies may be assessed as the sites are developed.
15. The 2016/17 Annual Monitoring Report set out in detail the monitoring criteria for each policy and it is not considered necessary to repeat this information. Policy details have been included below however for those policies which have been implemented during the 2018/19 monitoring period.

Policy LNGS1 - Allocation of land at east, south east and north west of Long Stratton for housing and a bypass.

16. Two planning applications for the above allocation are pending determination but continued to remain undetermined in the current monitoring period. It will only be possible to monitor the effectiveness of this policy once these applications have been determined.

Policy LNGS2 - Allocation of land west of Tharston Industrial Estate

17. No applications were coded against the above policy during this monitoring period.

Policy LNGS3 - Town Centre policy

Monitoring indicators: Development proposals for shopping, food and drink, leisure and other main town centre uses will be encouraged within the defined town centre boundary. No unacceptable concentration of non-A1 uses within the primary frontage of Long Stratton shopping area.

18. This policy applied to three planning applications within the monitoring period (2018/2171, 2018/2710 and 2018/2204). Planning permission was granted for the change of use of a body piercing and tattoo parlour unit (sui generis use class) to a shop (A1 use class) (ref: 2018/2171). The unit is located within the Town Centre Boundary and also within the defined Primary Shopping Area. Similarly, application 2018/2710 resulted in the addition of an A1/A3/A5 unit within the Town Centre, converting the existing public toilet block. 2018/2204 extended the use class of an existing A2 building located within the Town Centre to include B1a use.
19. Planning permissions 2018/2171 and 2018/2710 increased the number of A1 uses within the Town Centre. In addition, the granting of consent for a mixed-use building (2018/2204) was compliant with the requirements of this policy. It may therefore be considered that this policy is operating effectively.

Policy LNGS5 - General Green Infrastructure requirements for new developments within the Long Stratton Area Action Plan Area.

20. Application 2017/0810 sought consent for residential development on land off St Mary's Road and was refused planning permission in September 2018. (The application was subsequently dismissed at Appeal in September 2019 - ref: APP/L2630/W/18/3215019).
21. The application did not include specific green infrastructure connectivity (e.g., footpaths, GI connections) as investigations by the applicant had concluded that connections to existing GI corridors would require third party land which was not available. Although the application was refused planning permission this was not one of the refusal reasons.
22. However, whilst the application would have provided an amount of recreational space in excess of the requirements on site this was considered to be poorly integrated into both the scheme and the wider settlement and therefore may be considered to be in conflict with policy LNGS5 of the Area Action Plan.

Policy LNGS6 - Protecting existing recreation or amenity land in Long Stratton

23. Following the approval of a new sports pavilion at Manor Road playing field (2016/0376), two applications were submitted to vary the approved scheme. Both applications proposed changes to the overall design of the sports pavilion and did not alter the principles of the development.

24. This policy may be considered to be functioning as intended.

Policy LNGS7 - New recreation provision in Long Stratton

25. Details of application 2017/0810, and the reasons for the refusal of this scheme, are set out in the commentary for Policy LNGS5 above.

Policy LNGS8 -Land for new burial ground in Long Stratton

26. No applications were assessed against this policy in the current monitoring period.

Policy LNGS9 - Accessibility

27. No applications were assessed against this policy in the current monitoring period.

Conclusion

At this time there is a limited range of data available to assess effectively the implementation of the policy requirements contained in the Long Stratton Area Action Plan. This is principally due to the low number of applications that were assessed against the policies within the AAP during the monitoring period. Further monitoring in future years will continue to assess the effectiveness of these policies, in

particular following the determination of applications 2018/0111 and 2018/0112.

Wymondham Area Action Plan

28. This section monitors the policies from the Wymondham Area Action Plan for the period 01/04/18 to 31/03/19. As set out in the earlier reports, although the policies appear to be working as intended, the relatively low number of applications that have been determined and the early stages of on-site development mean that it is difficult to monitor their overall effectiveness.
29. The 2016/17 Annual Monitoring Report set out in detail the monitoring criteria for each policy and it is not considered necessary to repeat this information. Policy details have been included below however for those policies which have been implemented during the 2018/19 monitoring period.
30. A number of the Wymondham AAP policies share the same monitoring indicators which are assessed against each policy as appropriate.

Policy WYM1 - Allocation of land at Friarscroft Lane

31. No applications were determined against this policy during the 2018/19 monitoring period.

Policy WYM2 - Land at Old Sale Yard, Cemetery Lane

32. There have been no new applications submitted for the development of this site therefore the most recent consent remains the outline permission granted in 2017 (2016/2668). Full details of this scheme are set out in the 2017/18 Annual Monitoring Report.

Policy WYM3 - Land at South Wymondham

33. Outline planning permission was granted for this strategic allocation in 2014 (2012/0371 and 2011/0505). A significant number of applications have subsequently been submitted seeking to agree the details secured by condition. A number of applications were submitted within the current monitoring period, although these were fewer in number than in previous years. The approved details relate to a number of the planning conditions but do not fulfil any of the identified monitoring indicators for this site allocation. Further assessments of this policy will be undertaken in future years as additional applications are submitted.

Policy WYM4 - Retirement Care Community on Wymondham Rugby Club Site

34. There has been no change in the planning status of this allocated site and as such the consented scheme (2014/0799) for residential development means that it is unlikely that the objectives of Policy WYM4 will be met as originally intended. Applications seeking to agree matters secured by condition have been received and determined within the current monitoring period.

Policy WYM5 - Land at Browick Road

35. No applications were determined against this policy during the 2018/19 monitoring period.

Policy WYM6 - Land adjacent to Chestnut Drive Business Park, London Road

36. There have been no changes to the planning status of this site during the current monitoring period and no new applications have been submitted in 2018/19.

Policy WYM7 - Land at Elm Farm Business Park, Norwich Road

-
37. Outline consent was granted for the development of this site in 2015 (2014/1824) and a reserved matters application (2017/2924) was approved in August 2018 (therefore falling within the 2018/19 monitoring period). An amendment to the outline application - varying the site layout as well as the quantities/ratios of approved floorspaces - was also approved in August 2018 (2018/1182).
38. The monitoring indicators for this policy include the take up of the allocated land in line with the B1, B2 and B8 use classes in accordance with the requirements of the AAP, as well as a detailed design that both enhances and improves the gateway to Wymondham as approached along the B1172 from Hethersett.
39. The amended application was considered to accord with the requirements of this policy in terms of the mix of use classes on site and the overall design of the site was also considered favourably. As such it may be considered that the development of this site will meet the objectives of the policy.

Policy WYM8 - General green infrastructure requirements for new developments within the Wymondham AAP area.

40. There were no new applications coded against this policy within the current monitoring year and as such it remains difficult to assess the effectiveness of this policy in meeting its objective.

Policy WYM9 - General green infrastructure requirements for new developments in the North of Wymondham

41. No applications were assessed against this policy in the current monitoring period.
-

Policy WYM10 - General green infrastructure requirements for new developments in the South of Wymondham

42. No applications were assessed against this policy in the current monitoring period.

Policy WYM11 - General green infrastructure requirements for new developments in the West of Wymondham

43. No applications were assessed against this policy in the current monitoring period.

Policy WYM12 - Protecting existing recreation or amenity land in Wymondham

44. One application for an extension to the outdoor tennis court provision, as well as the erection of a new pavilion, at Ketts Park was coded against this policy in the current monitoring period (2018/2128). The scheme enhanced the existing recreational space within Wymondham by providing both additional and improved facilities for formal recreation. The application therefore complied with the policy requirements and the policy is considered to function as intended.

Policy WYM13 - New recreation provision in Wymondham

45. One application made reference to this policy in the planning assessment - the erection of 8 new dwellings on land at Park Close (2018/0669) - however the report concluded that although the application site lay adjacent to the strategic allocation, it did not form part of the site and therefore the requirement for a contribution towards new recreational facilities was not necessary. In addition, the overall scale of development on this site was below the threshold for the provision of recreational space associated with new development, in accordance with the Council's adopted 'Guidelines for Recreation Provision in New Residential Developments' SPD. Therefore, due to the application types submitted within this

period, no schemes contributed towards the provision of additional recreational space within Wymondham under this policy.

Policy WYM14 - Relocation of Wymondham Rugby Club

46. The 2017/18 Annual Monitoring Report set out the position regarding the 2014/0799 planning permission allowed on Appeal on this site. Further to this update, additional planning applications have been approved during the monitoring period seeking to address the planning conditions imposed on the original consent.
47. As previously noted, the granting of this planning consent means that the policy objective for the allocation of this particular site can not be met.

Policy WYM15 - Land for a new burial ground in Wymondham

48. Following the approval of planning application 2014/2495 a number of planning applications were submitted during the 2018/19 period however these were determined outside the current monitoring period and will be fully assessed in the 2019/20 Annual Monitoring Report.

Policy WYM16 - Changes of use in Wymondham Town Centre

49. The results of the monitoring that took place in 2018/19 are set out in the table below. This data shows that there was a decline in the numbers of A1 units both within the Primary Shopping Area (PSA) and the Town Centre Boundary (TCB) compared with the figures recorded in 2017/18. The numbers of A1 units in the defined PSA remains in excess of the targets set out in the policy (50%), however within the wider TCB the percentage has fallen slightly below the policy target of 45%. Therefore, it will be necessary to monitor this situation to seek to protect the availability of A1 uses in the future.

For the purposes of the current monitoring period this policy continues to work effectively for the PSA, however careful consideration will need to be given to future applications which effect the wider Town Centre.

	PSA: Percentage of A1 units	Town Centre: Percentage of A1 units
May 2018	53%	47%
November 2018	53%	44%
February 2019	52%	43%

Policy WYM17 - Sequential approach and impact assessment for retail provision in Wymondham

50. No applications were assessed against this policy in the current monitoring period.

Policy WYM18 - Land at Norwich Rd/ Postmill Close

51. As set out previously, this development was complete prior to the adoption of the Wymondham Area Action Plan and therefore the requirements of this policy have been met.

Policy WYM19 - Provision of a new station for the Mid-Norfolk Railway

52. No applications were assessed against this policy in the current monitoring period.

Conclusion

Generally, it may be concluded that the policies in the Wymondham Area Action Plan continue to be applied consistently and operate effectively. The major exception to this remains the planning consent granted for residential development at the former Wymondham

Rugby Club ground. Further assessments will take place throughout the plan period for the Wymondham Area Action Plan.

APPENDIX 5

ILLUSTRATIVE MASTERPLAN



Project
WYMONDHAM

Drawing Title
**(Wider Scheme) Illustrative
 Master Plan**

Date	Scale	Drawn by	Check by
08.11.19	1:5000 @A1 1:10000 @A3	SQ	SG
Project No	Drawing No	Revision	
27904	RG-M-31	C	

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APPENDIX 6
VISION DOCUMENT

PRELIMINARY VISION DOCUMENT

MARCH 2020



NORTH EAST

WYMONDHAM

& KETT'S OAK COMMON



An aerial illustration of a town. The scene shows a mix of residential and commercial buildings, some with blue roofs and others with brown or grey. There are numerous green trees scattered throughout the town. In the foreground, there is a large green park area with many small figures of people walking and playing. A yellow flag is visible on the left side. The overall style is a colorful, stylized illustration.

INTRODUCTION

This Vision Document has been prepared to support representations in response to the draft Greater Norwich Local Plan.

The Greater Norwich Local Plan will identify how sustainable growth will be delivered across the areas of Broadland District, Norwich City and South Norfolk up to 2038.

This Vision Document demonstrates how Wymondham, and specifically the site at North East Wymondham, offers a robust opportunity to deliver the Vision and Objectives of the Plan, through high quality sustainable growth.



CONTENTS

1. Why Wymondham?	4
1.1 A Strategic area for Growth	4
1.2 North-East Wymondham: A sustainable location	6
1.3 A Suitable Area for Growth	8
1.4 Sustainable Mobility	10
1.5 Benefits for the whole community	12
2. Kett's Oak Common	14
3. The Proposals	16
4. A Shared Vision	18
4.1 Working with the local community	18
5. Technically Sound Proposals	20
6. Summary of Benefits	22

1. Why Wymondham?

1.1 A STRATEGIC AREA FOR GROWTH

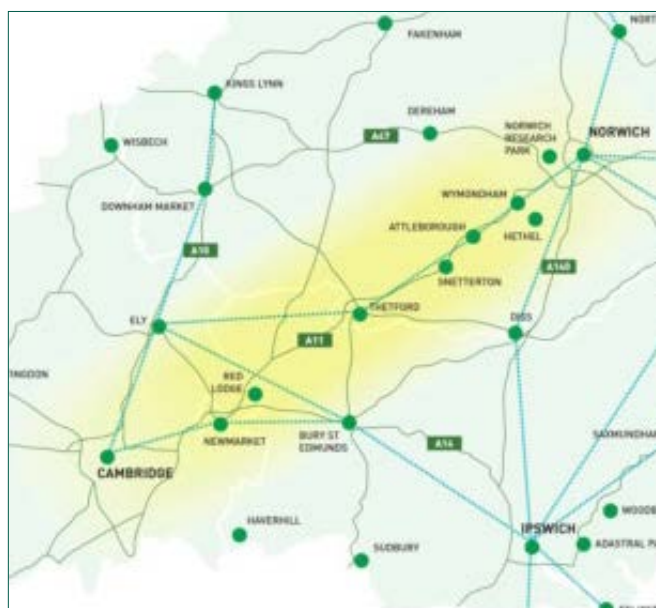
The market town of Wymondham is the largest settlement in South Norfolk, classified as a Main Town within the adopted Joint Core Strategy Settlement Hierarchy. The Joint Core Strategy identified Wymondham as a major housing and employment growth area.

Wymondham is located within the Norwich Policy Area as defined by the Joint Core Strategy and within the 'Core Area' identified by the SHMA, both areas identified as having the strongest functional connection to the Norwich Urban Area.

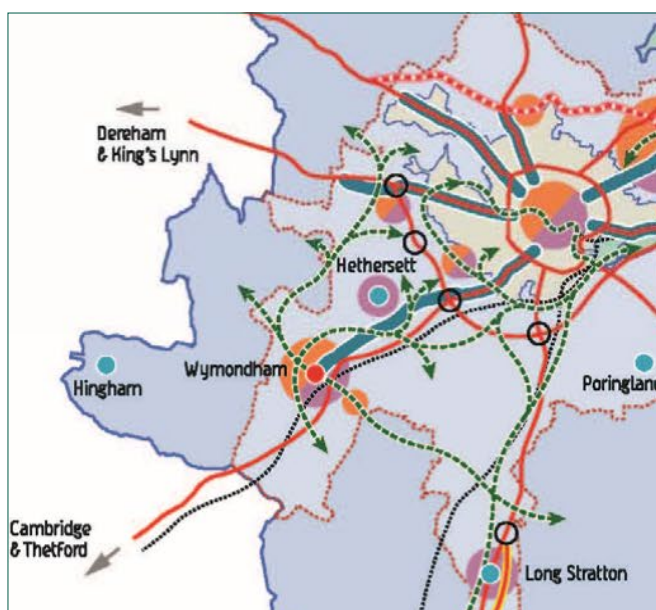
Furthermore, Wymondham is one of the largest towns on the Cambridge Norwich Tech Corridor.

Wymondham's lively and active community and its identity deeply rooted in history as testified by its charming town centre, alongside its sustainable transport links, make it a desirable place to stay and to move to.

As the largest settlement in South Norfolk, a key location within the Core Area and Cambridge Norwich Corridor, and a location with high demand for new homes, the town is a location where continued growth should be encouraged and allowed to occur.



Cambridge Norwich Tech Corridor Plan



GNIP - Joint Core Strategy Key Diagram (extract)



Wymondham - view of recent and ongoing development in the area

1.2 NORTH-EAST WYMONDHAM: A SUSTAINABLE LOCATION

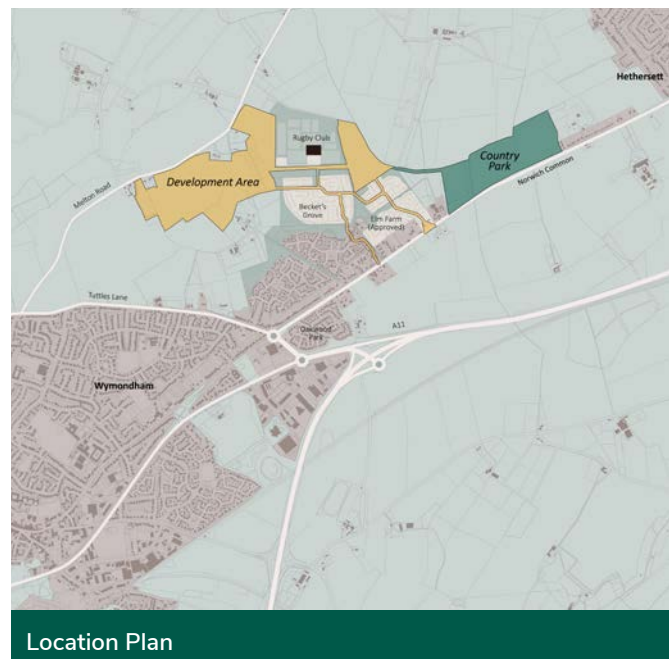
By virtue of its sustainable location, in proximity to the facilities and services of the town centre, with good accessibility to employment areas in Wymondham, Norwich and further afield and in the absence of major constraints, the area to the north east of Wymondham has experienced a significant amount of new development.

The area has been subject to a number of planning applications and planning appeals over the past 15 years culminating in consent for circa. 1,700 dwellings in the area, alongside a new state-of-the-art Wymondham Rugby Football Club leisure complex.

The majority of these consents have now been delivered but there remains a strong demand for new homes in the area.

As detailed in the following pages, the north east Wymondham area retains capacity for further growth, which will complement and enhance the development that has come forward in recent years. Development at the scale proposed on the site has the ability to deliver a truly sustainable development utilising existing sustainable transport modes which service the area alongside the provision of new services and facilities. Development in this area has the potential to create a new heart for the community benefiting both future and existing residents.

To complement the formal recreational offerings of the new Wymondham Rugby Football Club complex, wider opportunities exist in the North-East Wymondham area to improve accessibility and experience of the countryside, a key objective of the Wymondham Area Action Plan.



Location Plan



NORTH-EAST
WYMONDHAM

Aerial view of the location in the context of the town

1.3 A SUITABLE AREA FOR GROWTH

The north east is a long-established direction of growth for Wymondham, with development occurring along Norwich Common since the nineteenth century.

In recent years the development of Whispering Oaks, Becket's Grove and Oakwood Park have further established the area as a major growth location for the town. The relocation of Wymondham Rugby Club with the creation of state-of-the-art facilities has further ignited development potential in the area.

Ongoing development in north east Wymondham has the opportunity to complement and enhance the ongoing transformation of the area through the provision of new services and facilities enabling day-to-day needs to be met sustainability within walking distance of the majority of new homes within this new community.

Providing an integrated open space framework which recent schemes have started to identify, will better define the edge of the settlement and increase public accessibility to the countryside.

Alongside the formal recreational offerings of the new rugby club facility and spaces for play and recreation within residential development sites, an opportunity exists to extensively enhance countryside access through the creation of a new Country Park between Wymondham and Hethersett along Norwich Common. This will provide a significant benefit, being accessible to both settlements alongside the recently completed Wymondham Hethersett off-road cycle path.



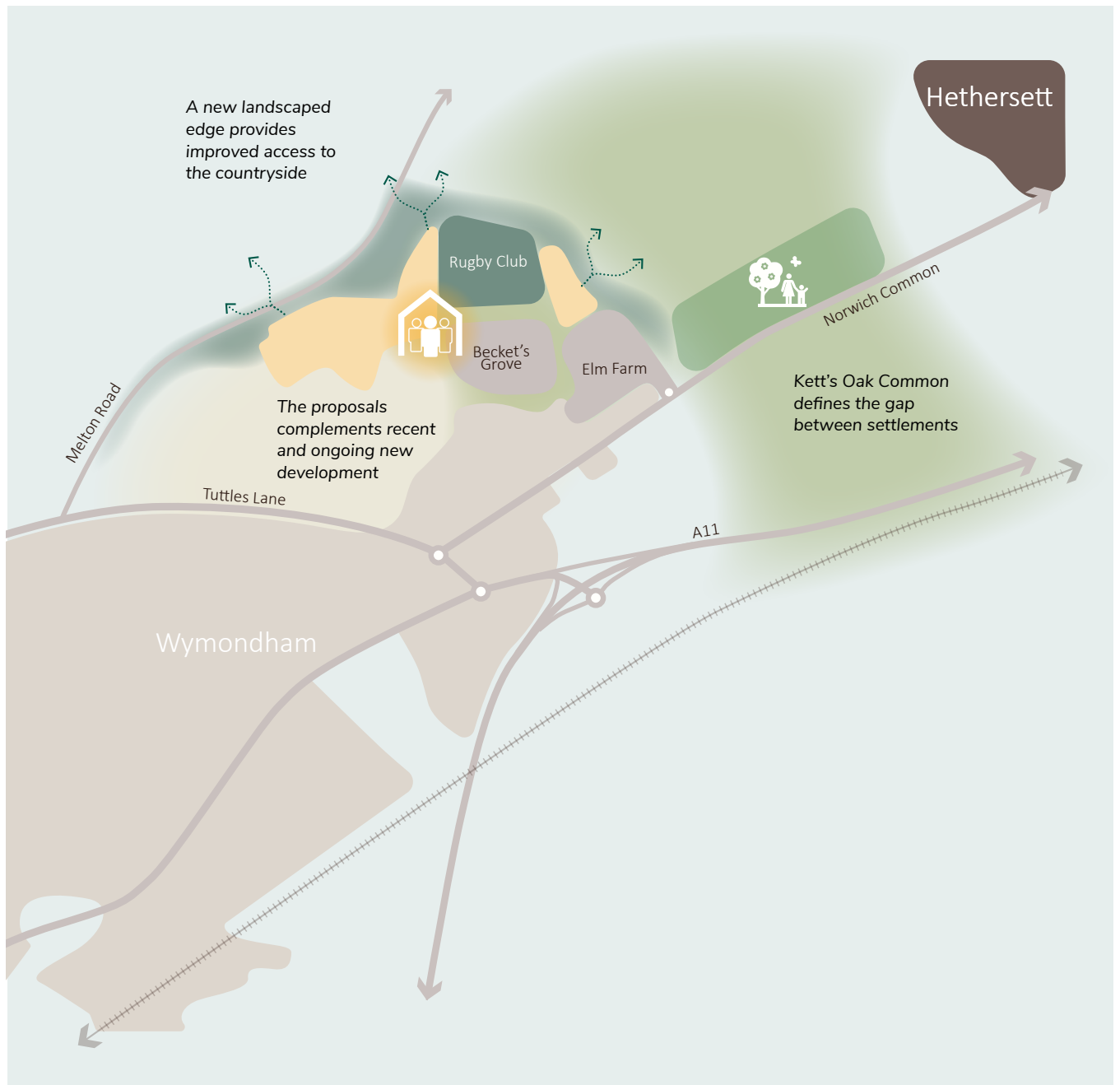
Becket's Grove development



Areas of recreation and ecology within development



Wymondham Rugby Football Club complex



Growth Diagram

1.4 SUSTAINABLE MOBILITY

The Greater Norwich Infrastructure Plan (GNIP) published June 2019 identifies the strategic importance of key radial public transport corridors into Norwich to serve and support growth areas, one of which runs along Norwich Common.

The existing, already good, public transport provision from this area, offering direct links to the Norwich Urban Area and Wymondham Town Centre and its railway station is envisaged to improve in the future.

The GNIP also focuses on the need to improve the walking and cycle networks across the area. North east Wymondham already benefits from existing networks of footpaths and cycleways including the recently completed off-road Wymondham Hethersett cycle path which provides a safe, convenient and attractive connection between the town to Hethersett. This offers the opportunity for direct links into the new growth area, fostering cycling as a main mode for commuting.

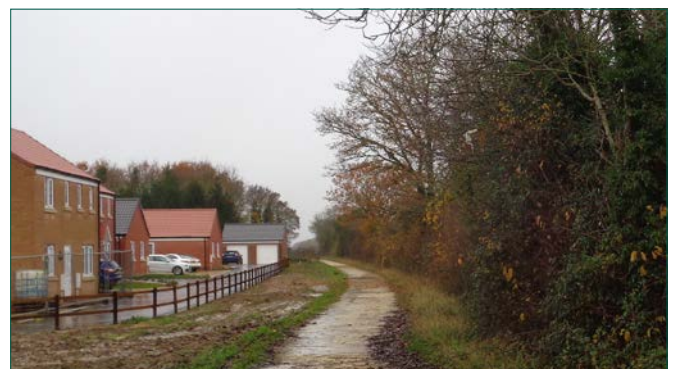
Ongoing development in the area has the potential to enhance the local network of leisure routes through the enhancement of existing public rights of way and creation of new links providing a benefit to the whole community by increasing the accessibility of the countryside for recreational purposes. Further, these offer convenient alternatives to the use of cars for internal movement to services and facilities, including the proposed primary school and local centre.



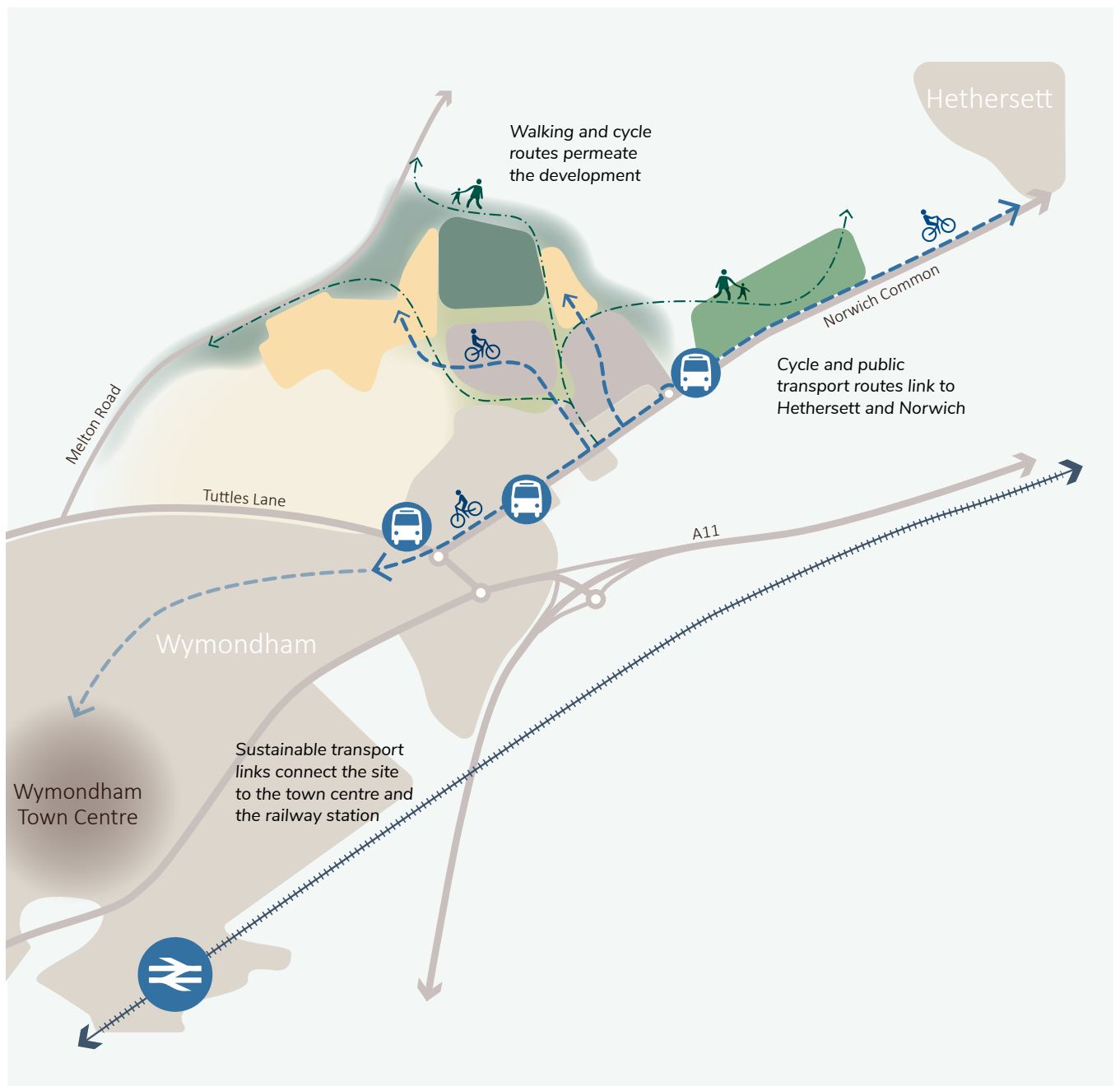
Wymondham Train Station



Bus stop and bicycle route along Norwich Common



Footpath through the site



Sustainable Mobility Diagram

1.5 BENEFITS FOR THE WHOLE COMMUNITY

Alongside 650 new homes, including a significant number of affordable homes, the development at North East Wymondham seeks to provide new community infrastructure with potential for a new primary school and a local centre including retail, community and health opportunities.

This new community infrastructure is provided within easy walking distance of the majority of residents within this new community, thereby creating a new heart for north east Wymondham providing much needed services and facilities not currently available in this area.

Celebrating and enhancing the setting of Kett's Oak, one of the UK's most renowned trees, the new County Park, named as Kett's Oak Common, between Wymondham and Hethersett will create an exciting new area for peaceful recreation for existing and future residents of Wymondham and Hethersett. Kett's Oak Common will also have the benefit of contribute to enhancing the local landscape including through new planting and the creation of new habitats for wildlife.

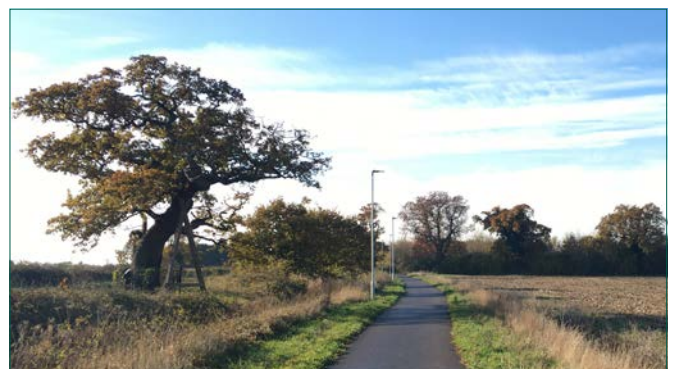
Within the Country Park land will be safeguarded for a potential new Sixth Form building, to facilitate the relocation of Wymondham High's existing provision and allow the school to expand its secondary education capacity on what is currently a constrained site. The proposed location, on the Wymondham Hethersett cycle path and within the Country Park, makes the most of the health and educational advantages of being at close reach to quality open space, whilst being conveniently accessible both from Wymondham and Hethersett.



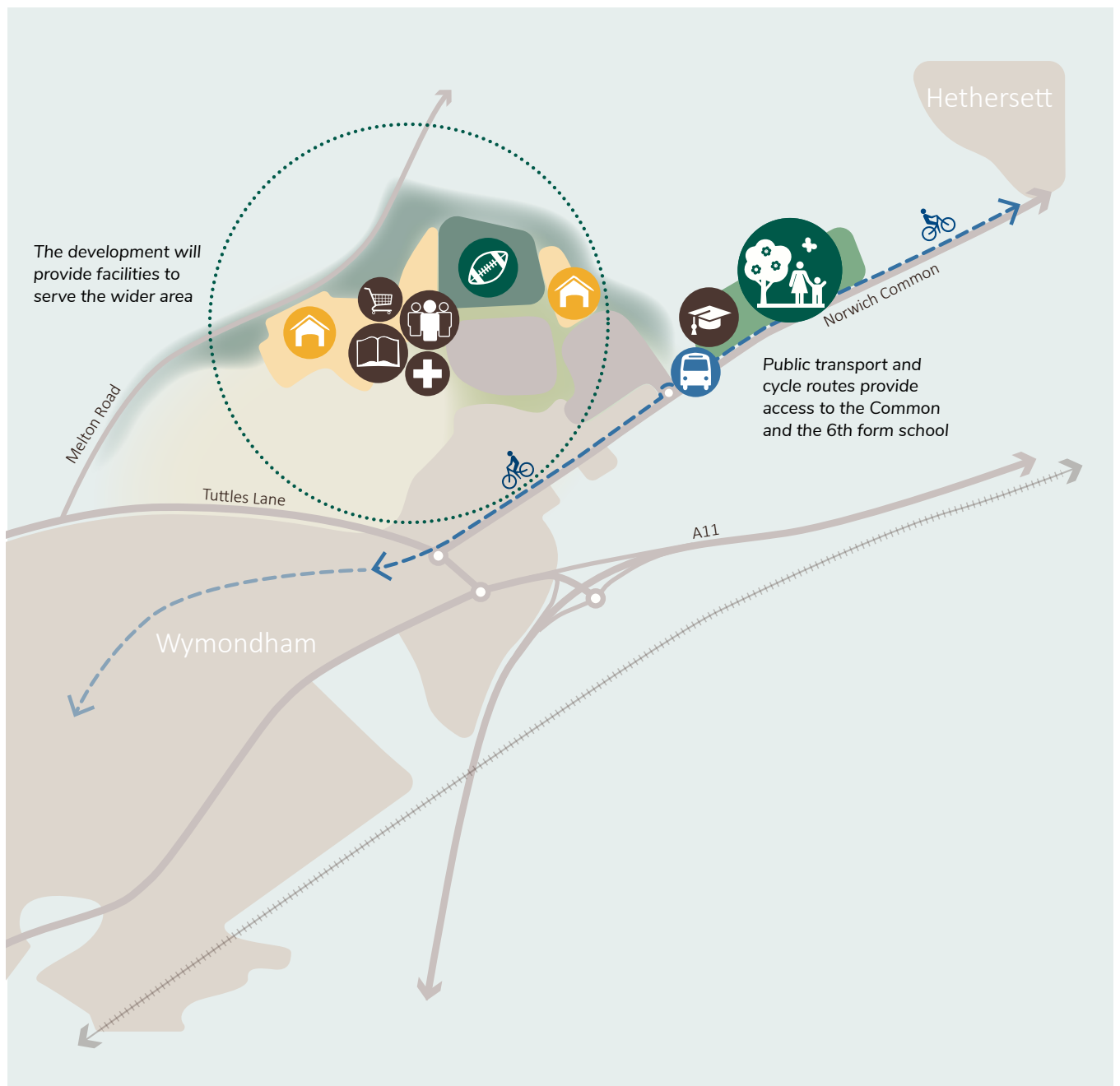
Primary School Precedent



Local Centre Precedent




Kett's Oak along Norwich Common



Community Diagram

2. Kett's Oak Common





With more than 16 hectares of parkland, Kett's Oak Common will give to the residents of Wymondham and Hethersett the opportunity to experience and enjoy the Norfolk countryside.

An attractive network of routes will allow visitors to wander through the different areas of the park, which will be landscaped to reintroduce the typical habitats of the area that have been obliterated by years of intensive monocultural farming.

The park will not only have a high ecological value but will also foster the sense of community providing educational opportunities for the local schools, as well as promoting physical and mental health through recreation and informal activity.



3. The Proposals





The illustrative masterplan has been developed alongside an understanding of the constraints and opportunities of the site, and in response to feedback received from community engagement.

The masterplan demonstrates how a development for up to 650 dwellings could be successfully integrated with the existing and committed development in the area to establish a sustainable, active and attractive community in north east Wymondham including the delivery of new services and facilities.

Key

- 1 Local Centre
- 2 Primary School
- 3 Village Green
- 4 Sustainable Urban Drainage (SuDS)
- 5 Local Green
- 6 Existing Hedgerow
- 7 Potential Emergency Access
- 8 Lower Density Rural Edge
- 9 Kidd's Moor Copse
- 10 Country Park
- 11 Kett's Oak
- 12 Safeguarded Site for 6th Form School
- 13 Access Restricted to Pedestrian & Cycle Access Only

4. A Shared Vision

4.1 WORKING WITH THE LOCAL COMMUNITY

Our vision for North East Wymondham has developed over time alongside the evolution of this new community. Throughout this process we have sought input from technical experts, the local community and key stakeholders, in order to better understand how a development could successful be delivered on the site.

As part of this, a public exhibition was held at Wymondham Rugby Football Club over a day on 26 November 2019, presenting our vision to the community and other invitees. The event was widely advertised in the local press alongside invites being delivered to circa. 1,700 homes within the north east Wymondham area.

The event was well attended by circa. 400 local residents, including many from the adjoining development sites who highlighted the need for new facilities in the area, including a primary school and convenience retail.

At the same time, the proposals have been reviewed throughout a comprehensive consultation process with the local authority and statutory consultees, to seek their advice on the proposals to ensure that the proposals answer local needs whilst meeting the local authority aspirations for high quality and sustainable development.



Exhibition invite leaflet



View of the exhibition



Local community newsletter talking about the proposals



Some of the comments received at the public exhibition event

5. Technically Sound Proposals

As part of the work to understand the opportunities and the constraints of the site and develop the proposals, a comprehensive suite of technical and environmental reports have been prepared. These will be submitted as part of the forthcoming planning application for the site, alongside an Environmental Statement.

A summary of the salient points of these is included here for reference, clearly demonstrating the development proposed is not technically constrained and would be deliverable in the short term.



LANDSCAPE AND VISUAL

- Key landscape features would be retained, maintaining a physical and visual enclosure of substantial vegetation which contains potential visual effects.
- Visibility from surrounding areas towards the Site is relatively limited by existing vegetation and the relatively flat topography.
- Development is considered to avoid any significant harm to the character of the wider landscape.
- Furthermore, the proposed country park would ensure that the gap between the settlements of Wymondham and Hethersett would remain in open in perpetuity.



BUILT HERITAGE AND ARCHAEOLOGY

- There are no designated assets located within the Site or the immediate area. Furthermore, the Site is not located within the vicinity of a Conservation Area.
- The proposed development would therefore have a 'neutral' impact upon the significance of any built heritage assets in the surrounding area. No built heritage specific mitigation is required in this instance.
- In respect of archaeological assets, no Scheduled Monuments, World Heritage Sites, Historic Battlefield Sites or Historic Wreck Sites lie within the immediate vicinity of the Site.
- A geophysical survey of the Site which identified no features of likely archaeological interest.
- Further archaeological work in the form of a proportionate targeted archaeological investigation (trial trenching) can be undertaken post-consent secured by an appropriately worded planning condition.



TRAFFIC AND TRANSPORT

- The anticipated development-generated traffic has been tested on the local highway network and the local highway network was found to continue to operate in a satisfactory manner.
- The development is unlikely to give rise to any significant safety issues on the local highway network.
- There are good pedestrian, cycle and public transport links between the Site and existing services and facilities in Wymondham.
- The Site is therefore considered wholly appropriate for the proposed development in this respect.
- A Residential Travel Plan has been prepared which seeks to influence travel behaviour of occupants of the development through a range of measures aimed at reducing reliance on private car, particularly for single occupancy trips.



ECOLOGY

- No statutory or non-statutory nature conservation designations present within or immediately adjacent to the Site.
- The Site is dominated by arable habitat not considered to be of ecological importance, with woodland, trees, ponds and hedgerows considered to be of importance at the local level.
- The proposed development avoid any significant effects in relation to habitats of ecological importance.
- Following mitigation, it is considered that the Development would result in an overall gain in the existing ecological interest supported by the site.
- Proposed enhancements will also deliver significant benefits in terms of green infrastructure, providing an extensive network of green links and corridors through and around the Site.



FLOOD RISK AND DRAINAGE

- The Site is considered to be at a low risk of fluvial/tidal flooding.
- The majority of the Site is at 'very low' risk of surface water flooding from extreme rainfall (less than 1 in 1,000 annual probability).
- Subject to the mitigation measures identified in the report, the risk of flooding from all sources is considered to be low.
- The proposed development will include a surface water drainage strategy ensuring that runoff from the Site is managed. Development on Site will therefore not increase the risk of flooding in other areas surrounding it.
- In respect of foul drainage, the Site is designed to drainage via gravity to a foul water pumping station to the north of the Site.
- Foul Water will be accommodated within the Anglian Water network, alongside any necessary offsite upgrades required to support this.



NOISE AND VIBRATION

- The results of a acoustic survey demonstrates suitable internal sound levels would be achievable across the Site.
- The construction phase has been assessed and the noise and vibration impacts have been shown to be Negligible and Not Significant.
- Operational noise has also been assessed in terms of increased road traffic and plant noise, demonstrating the impact to be Negligible and Not Significant following implementation of proposed mitigation.



AIR QUALITY

- Air Quality modelling confirms the location is suitable for development without the need for mitigation measures to protect future users from poor air quality.
- During construction, good practice dust control measures will be implemented to ensure there is negligible significance of potential air quality impacts arising from dust generated by earthworks, construction and other activities.
- Air quality impacts as a result of operational phase exhaust emissions are predicted to be negligible at all sensitive receptor locations considered.



CONTAMINATION

- In light of historic agricultural uses of the Site and adjoining uses there is potential contamination which poses a moderate/low risk to future residential uses.
- Further limited investigations are recommend to information detailed design and identify any remedial action necessary to mitigate risks.



ENERGY

- A energy strategy for the Site will be employed including, at its core, the reduction of energy use through effective energy efficiency measures and efficient servicing solutions, anticipated to lead to a significant reduction in energy consumption and CO2 emissions compared to a standard development.
- The development would holistically incorporate sustainable principles into the full range of sustainability aspects covered by relevant policy requirements relating to energy conservation and carbon emissions reduction.

6. Summary of Benefits



NEW, DIVERSE AND AFFORDABLE HOMES

The development seeks to provide up to 650 new homes, of varying size and type including bungalows, smaller homes for first time buyers, and larger family homes, alongside the delivery of affordable homes.



KETT'S OAK COUNTRY PARK

A new country park of more than 16 hectares in a highly accessible location offers new access to the countryside for residents of the new community and the wider area. The country park has potential to deliver significant ecological benefits alongside celebrating one of the UK's most renowned trees.



A HEART FOR THE COMMUNITY

A new Local Centre, located in close proximity to new Wymondham Rugby Football Club, adjoining the proposed primary school site, and within easy walking distance of the majority of the north east Wymondham community, seeks to deliver much needed facilities and services to create a new focal point for this growing community.



ATTRACTIVE AND ACTIVE OPEN SPACE

Additional attractive and multifunctional open space will integrate to the existing network, the wider countryside and the new Wymondham Rugby Football Club to provide significant new areas of amenity, leisure and ecology space.



EDUCATION PROVISION

The development provides land for a new two-form entry primary school, facilitating the delivery of a highly accessible new school to residents in the north east Wymondham area. The development also enables the relocation of Wymondham High's Sixth Form to facilitate the expansion of secondary provision, delivering a significant benefit to educational capacity for Wymondham and the wider area.



A PROVEN TRACK RECORD OF DELIVERY

The site promoters have successfully secured consents for circa. 1,400 dwellings and the new Wymondham Rugby Football Club complex in the north east Wymondham area in the past 15 years. This represents a proven and trusted track record of the promoters in bringing forward suitable sites.

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**BARTON
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NORTH EAST

WYMONDHAM

& KETT'S OAK COMMON



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TOWN PLANNING
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ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
INFRASTRUCTURE &
ENVIRONMENTAL PLANNING
HERITAGE
GRAPHIC COMMUNICATION
COMMUNICATIONS & ENGAGEMENT
DEVELOPMENT ECONOMICS

APPENDIX 4

SUSTAINABILITY APPRAISAL REVIEW

North East Wymondham

**Review of the Sustainability Appraisal supporting the Regulation 19
Publication Draft Greater Norwich Local Plan**

March 2021

North East Wymondham

Review of the Sustainability Appraisal supporting the Regulation 19 Publication Draft Greater Norwich Local Plan

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Issue/Rev:	01	02
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Prepared by:	JM	JM
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1.0 Introduction

- 1.1 This report presents a review of the Sustainability Appraisal (SA) process supporting the Publication draft Greater Norwich Local Plan (GNLP), which is at Regulation 19 stage¹. The GNLP is being produced by Broadland District Council, Norwich City Council and South Norfolk Council working together with Norfolk County Council through the Greater Norwich Development Partnership (GNDP) and will guide development up to 2038. There are two parts to the GNLP, the first is the Publication draft GNLP Strategy which contains the planning strategy for growth in Greater Norwich from 2018 to 2038 and the second is the Publication draft GNLP Sites document which contains allocation policies for the sites to deliver the strategy. The review has focused on the SA (which incorporates Strategic Environmental Assessment (SEA)) of the GNLP: Regulation 19 SA Report (herein referred to as the Regulation 19 SA Report), prepared by Lepus Consulting on behalf of the GNDP in January 2021².
- 1.2 The Regulation 19 SA Report has been published for consultation as part of the evidence base supporting the Publication draft GNLP. Whilst the review has focused on the latest SA report, reference has been made to earlier reports where necessary to give a view on the adequacy of the whole iterative SA process.
- 1.3 The GNDP published the SA Scoping Report in 2017³, following consultation with Historic England, Natural England, the Environment Agency and other relevant bodies in 2016. The SA Scoping Report forms the starting point for the SA and guides the evolution and assessment of the emerging GNLP. The next stage of the SA process involved the preparation and consultation of the Regulation 18 Interim SA⁴, which was prepared alongside the Regulation 18 Stage A Growth Options and Site Proposals Consultation in January to March 2018. The Regulation 18 (C) SA Report⁵ was published for consultation in January to March 2020 as part of the evidence base supporting the GNLP Draft Strategy. The Regulation 19 SA Report is the latest stage of the SA process.
- 1.4 The 'final' SA report will then be submitted with the GNLP to the Secretary of State for examination in public.
- 1.5 Barton Willmore undertook a review of the SA prepared for the Regulation 18 (C) consultation in January 2020 and Table 2.2 of the Regulation 19 SA Report lists the comments that were

¹ GNDP, January 2021, GNLP Publication Draft Regulation 19 Consultation – 1st February to 22nd March 2021.

² Lepus Consulting on behalf of the GNDP, January 2021, SA and SEA of the GNLP: Regulation 19 SA Report.

³ GNDP, March 2017, SA Scoping Report for the Greater Norwich Local Plan.

⁴ GNDP, March 2018, Interim Sustainability Appraisal of the Greater Norwich Local Plan.

⁵ Lepus Consulting on behalf of the GNDP, January 2020, SA and SEA of the GNLP: Regulation 18 (C) SA Report

received during this consultation, including those from Barton Willmore, and identifies how these have been incorporated into the Regulation 19 SA Report. Our response in terms of whether we agree that these comments have been addressed, or whether further clarification is required, is outlined in the later sections of this report. The full SA review is included at Appendix 1 and focuses on the areas we felt needed more explanation and detail at the Regulation 18 (C) stage. It uses a 'traffic light' scoring system to identify areas that would benefit from improvement (amber) and those elements of the SA process that are considered to comply fully with the requirements (green). No areas of major deficiency were identified in the SA (red).

- 1.6 In addition, this report includes an appraisal of the development site 'North East Wymondham'. North East Wymondham has experienced recent growth over the last 10 years that extends built and committed development along Norwich Common and Tuttle's Lane towards Melton Road. The site is located in an area that has been subject to a number of planning applications and appeals which has culminated in consent for approximately 1,700 residential dwellings forming an urban extension to Wymondham. This is due to its strategic location along the Cambridge Norwich Growth Corridor, as set out within the Strategic Housing Market Assessment (SHMA)¹ Core Area and the Norwich Policy Area (NPA) identified within the Joint Core Strategy (JCS)². The Regulation 19 GNLP has selected two sites in Wymondham for allocation.
- 1.7 The site-specific appraisal is included at Appendix 2 and has been undertaken by Barton Willmore utilising the same matrix methodology and fifteen SA Objectives used to consider the alternative site options within the SA process for inclusion within the GNLP. The matrix assessment with a colour coded key is a method often used for the assessment of site options in SAs, to make the comparison of the positive and negative sustainability aspects of a site clear and consistent. The appraisal provides commentary on the score that we consider should be awarded for each objective indicator question. The appraisal draws on the extensive evidence base available for the site, including the draft masterplan and draft Environmental Statement (ES), which would be submitted in support of a planning application in due course.

¹ Opinion Research Services, June 2017, Central Norfolk Strategic Housing Market Assessment 2017 Report of Findings

² GNDP, January 2014, Joint Core Strategy for Broadland, Norwich and South Norfolk, adopted March 2011 and amended in January 2014.

2.0 Review of SA

Purpose of Review

- 2.1 A review of the SA documents has been undertaken against the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the "SEA Regulations") and Section 19 of the Planning and Compulsory Purchase Act 2004 (the "Act"), which sets out requirements for SA. SA is a complex and legalistic process and should be undertaken iteratively, alongside the preparation of the Plan.
- 2.2 A Local Plan must be prepared in accordance with Section 39 of the Act "*with the objective of contributing to the achievement of sustainable development*". It should therefore be informed by the SA process, which itself must comply with the SEA Regulations.
- 2.3 Barton Willmore undertook a review of the SA at the Regulation 18 (C) consultation stage in January 2020. The full review of the SA process which includes the Regulation 19 SA Report is presented at Appendix 1. This review has sought to focus on the areas we felt needed more explanation and detail at the Regulation 18 (C) stage and identify whether these comments have been addressed in the Regulation 19 SA Report and if there are any areas of the SA that would benefit from further focus or clarity in order to ensure that the Plan is determined as sound at Examination. As above, whilst the review has focused on the Regulation 19 SA report, reference has been made to earlier reports where necessary to give a view on the adequacy of the whole iterative SA process.

Review Summary

- 2.4 No areas of major deficiency were identified in the SA.
- 2.5 Table 2.2 of the Regulation 19 SA Report lists the comments that were received during the Regulation 18 (C) consultation and identifies how these have been addressed within the Regulation 19 SA Report. Barton Willmore's comments and the response in the Regulation 19 SA Report are shown in Table 1 below. A discussion on whether we agree that our comments have been addressed or not within the Regulation 19 SA Report is presented below and this is reflected by the compliance review at Appendix 1.

Table 1. Comments received during Regulation 18 (C) and Incorporation into the Regulation 19 SA Report

Areas of the Regulation 18 (C) SA Identified as Requiring Additional Consideration	Incorporation into the Regulation 19 SA Report
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<p>Existing environment (Habitats Regulations Assessment (HRA)) – Outlining the conclusions of the HRA would give more meaning to the assessment of ecological effects, particularly when assessing the sites and the decisions made and would make the argument that the findings have been incorporated into the SA more robust. There is no evidence that cumulative effects have been assessed in relation to European sites, which would have been the case for in-combination effects in the HRA, for legal compliance. Given the need for assessments to be coordinated, it would be helpful to have more information within the Regulation 18C SA Report on the HRA undertaken for the Local Plan to date.</p>	<p>Further consideration to the findings of the HRA process is considered in Chapter 8.</p>
<p>Relevant Policies, Plans and Programmes - The Regulation 18 (C) SA Report does not adequately reference the Cambridge Norwich Growth Corridor, SHMA Core Area or the NPA.</p>	<p>The Cambridge Norwich Growth Corridor has been discussed in paragraph 13.1.18 of this SA report.</p>
<p>Likely significant effects on the environment (cumulative effects) - A definition for short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects is not provided and would be helpful for clarity. Cumulative effects are only mentioned in relation to major negative scores and there is no explanation of how these are considered within each topic. The approach to the assessment of cumulative effects is not well outlined and seems inconsistent between topics. In addition, there is no consideration of how each of the SA Objectives might interact with one another.</p>	<p>Short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects are considered throughout the SA process. A separate cumulative effects exercise has been carried out in Chapter 16.</p>
<p>Reasonable Alternatives - Additional information on the site selection process would be helpful, for example more justification where sites have been excluded or options narrowed down. This should be reflected in the iterations of the SA and would make the process more robust and transparent.</p>	<p>Full detail on the selection process for the GNLP can be found in Appendix G.</p>
<p>Monitoring – The suggested monitoring targets are very vague and there are still some gaps to be identified. Additional information could be included by using local/national targets, and further details on how the effects will be monitored, over what period, frequency etc would increase robustness in the next Consultation.</p>	<p>Detailed monitoring recommendations are made at Chapter 17 of this SA report.</p>
<p>Non-Technical Summary - There is no Non-Technical Summary (NTS) within the supporting documents. Whilst the GNLP is at the Regulation 18 Consultation stage, it is good practice to have an NTS for each revision of the SA, so that it is clear how the SA has evolved through the iterations. This should be rectified at the Regulation 19 Consultation.</p>	<p>A Non-Technical Summary is only required for an Environmental Report (Regulation 19 SA Report). The NTS can be found in Volume 1.</p>
<p>Reasonable Alternatives (mitigation) - Including site assessments undertaken post mitigation would likely result in more positive sustainable scores than those awarded.</p>	<p>Post-mitigation impact scores for all reasonable alternative sites can be found in Appendix E.</p>

Existing Environment (HRA)

- 2.6 Section 8 of the Regulation 19 SA Report considers the effects of the GNLP on biodiversity, including Internationally and European designated sites. The section concludes that the draft HRA has not been able to provide conclusive findings but emerging findings suggest that

subject to satisfactory resolution of the outstanding matters listed in the report (version dated 18th December 2020), there would be no adverse effect upon the integrity of any European site'. It is agreed that the HRA and SA are better linked at the Regulation 19 Stage and the HRA has been referred to in the assessment of ecological effects however, it would be beneficial for the final HRA to be prepared prior to Examination and the SA to demonstrate how the final conclusions of the HRA process have been incorporated into the SA. The addition of Table 16.2, which includes an assessment of cumulative effects of the GNLP in relation to threats or pressures to European sites, is welcomed and perhaps the final HRA can add to this assessment further.

Relevant Policies, Plans and Programmes

- 2.7 We do not agree that this comment has been thoroughly addressed. It is clear that the Cambridge Norwich Growth Corridor forms an important part of the GNLP and that housing growth should be focused in the Strategic Growth Area, including the Norwich urban area, Hethersett and Wymondham, in line with the principles of the selected spatial strategy Policy 1 set out in detail in Appendix 1. It is suggested that the Cambridge Norwich Growth Corridor is still not adequately referenced in the Regulation 19 SA Report in terms of the relationship between the two, the SA conclusions and particularly in assessing alternative sites in Wymondham, considering this is highlighted as a key focus area for growth.
- 2.8 No additional reference has been made to the SHMA Core Area and the NPA in the Regulation 19 SA Report. Additional justification should be provided within the site assessments in terms of selecting or discounting sites, outlining how the sites align with the aims, objectives and principles set out in the Cambridge Norwich Growth Corridor, SHMA Core Area and the NPA plans. For example, these are not mentioned in Appendix G: Reasons for Selection and Rejection of the Regulation 19 SA Report. The Regulation 19 SA Report does not refer to the recent Government commitment to the Oxford – Cambridge Spatial Planning Framework¹, which will have a status on par with the National Planning Policy Framework (NPPF)². Accordingly, any policies within Local Plans that fall within regions that have any geographical link to this region must be in accordance with the Framework as it emerges. The Oxford – Cambridge Spatial Planning Framework will focus on the delivery of up to 1 million new homes, as well as significant infrastructure and economic development. Therefore, the Regulation 19 SA Report should refer to the Oxford – Cambridge Spatial Planning Framework to ensure the Cambridge Norwich Growth Corridor is consistent with National Planning Policy as a focus for development and justified and effective strategy within the GNLP.

¹ Ministry of Housing, Communities and Local Government, February 2021, Planning for sustainable growth in the Oxford - Cambridge Arc An introduction to the Oxford-Cambridge Arc Spatial Framework

² Ministry of Housing, Communities and Local Government (February 2019) National Planning Policy Framework

Likely Significant Effects on the Environment (Cumulative Effects)

- 2.9 The approach to the assessment of cumulative effects has improved at the Regulation 19 SA Stage. The Regulation 19 SA Report includes a dedicated cumulative effects assessment exercise in Section 16 which states that cumulative effects are those that arise when the total significant effects of the GNLP and assessed alongside known existing underlying trends and other plan and programmes. Section 18.2.4 of the Regulation 19 SA Report states that some of the identified residual adverse effects are associated with greater levels of uncertainty and potentially could be considered to be greater in magnitude, for example residual adverse effects associated with air quality and climate change. The Plan includes measures to reduce these effects, however, these are effects that are predicted to happen with or without the Plan and when considered cumulatively, a residual adverse effect would still be likely to occur. The assessment could be made stronger by considering how each of the SA Objectives might interact with one another. We agree that Section 16 largely addresses this comment.

Reasonable Alternatives

- 2.10 We do not agree that our comments regarding the selection of reasonable alternative sites have been addressed for the following reasons.
- 2.11 Following comments received during the Regulation 18 consultations and recommendations set out in the SA, the final selected strategic policies of the GNLP include Policy 1 – The Sustainable Growth Strategy, which, focuses growth within the Cambridge Norwich Growth Corridor. In terms of the appraisal of the housing requirement, the Regulation 18 (C) SA Report assessed the impact of the development of 44,340 homes within Policy 1 and the Publication Draft Plan at Regulation 19 includes a further c. 5,000 dwellings, to take account of the 2018 household projections, making the total housing potential within Policy 1 49,492 dwellings. The performance of Policy 1 at Regulation 18 (C) and Regulation 19 against the sustainability objectives remained similar despite the change in housing requirements. The Regulation 19 SA Report appraises the additional 107 reasonable alternative sites which were considered post Regulation 18 (C).
- 2.12 There are only two sites allocated within Wymondham in the Regulation 19 Plan (GNLP0354R Land at Johnson’s Farm and GNLP3013 North of Tuttle Lane). This is surprising given Wymondham’s key location within the preferred Strategic Growth Area which is focused around the main Cambridge Norwich Tech Corridor area, including Norwich, the North East Growth Triangle, the remainder of the Norwich Fringe, Hethersett and Wymondham and the recognition of the role and importance of the Cambridge Norwich Tech Corridor, as a clear and suitable location to focus growth and housing allocation. In particular, it is unclear how with a further c. 5,000 dwellings included at Regulation 19, to be included within Policy 1, there is not

additional allocations afforded to Wymondham. In fact, at the Regulation 18 (C) stage, twelve sites were presented within Wymondham as a strategic location for growth (Section B.51 within Appendix B of the Regulation 18 (C) SA Report presents the appraisal of the Wymondham cluster, comprising twelve sites surrounding the town of Wymondham) and now there are just two allocations, but an addition 5,000 houses proposed.

- 2.13 Appendix G of the Regulation 19 SA Report includes the reasons for selection and rejection of sites. The reasons for the rejection of sites within Wymondham, that have not been allocated within the GNLP, for example GNLP0525R and GNLP0525AR North Wymondham include 'a contingency site or sites for 1,000 homes in Wymondham is not being sought' and that 'a third site allocation in Wymondham would be in excess of the strategic requirement for new homes as set out in the Part 1 Strategy'. The reasons for rejection somewhat contradict the reasons for including the Land at Johnson's Farm (GNLP0354R) within the allocated sites, which states that 'a 1,000-home contingency is now not going ahead for Wymondham, but across the Greater Norwich area as a whole the overall housing number is increasing by 5,000' and that the larger allocation is selected because the uplift of 50 homes is helpful given the strategic decision (location within the Strategic Growth Area). This clearly promotes Wymondham as an important area for housing growth and therefore it is unclear why there are just two allocations and why additional reasonable alternatives beyond commitments have not been assessed/ Wymondham has been discounted from further development given the Strategic Growth Area. In addition, reasons relating to how or why sites have been discounted on their sustainability credentials and how the SA has influenced this decision are not included. Therefore, it is unclear how the site selections have taken place and the robustness of the decision making could be questioned.
- 2.14 There is little reference to the Cambridge Norwich Growth Corridor and instead, additional sites have been allocated outside of this area. This is questionable when the approach taken by the Council is to focus on the Strategic Growth Area Cambridge Norwich Tech Corridor as a justified and effective strategy. There are a number of areas proposed for new allocations outside of the Strategic Growth Area, totalling 2,682 proposed new houses, in Aylsham, Diss, Harleston, Acle, Loddon/Chedgrave, Hingham, Blofield, Broadland Village Clusters. No clear justification is provided, particularly in terms of sustainability, as to why this growth is directed to settlements outside of the Strategic Growth Area. Within the Strategic Growth Area, the majority of homes identified are on existing commitments. The reasons for allocating each of the sites in Appendix G of the Regulation 19 SA Report include that 'the principle of development has been established by virtue of the existing local plan allocation' and 'allocation carried forward from the 2014 Norwich Local Plan.' This does not provide rationale or certainty that all reasonable alternatives in Wymondham, beyond identified commitments, have been assessed for development. This is, again, surprising due to Wymondham's location in the Strategic Growth Area.

- 2.15 At the Regulation 18 stage it was noted that following a review of the Wymondham site assessments, and the appraisal of the site 'North East Wymondham', in Appendix 2 of this report, it is clear that a) Wymondham justifiably represents a strategic location for growth and b) North East Wymondham should be included within any proposed site allocations within the GNLP on its sustainability credentials. This conclusion stands at the Regulation 19 stage. The site North East Wymondham is suitably located in proximity to local facilities, public transport, employment opportunities and green spaces, and will add to the current services available in the area through the provision of land safeguarded for schools, a local centre and a health hub. The site has the potential to retain and enhance elements of the landscape, green infrastructure network and pedestrian and cycling routes in the existing and new community, providing benefits in relation to several objectives, including climate change mitigation and adaptation, biodiversity, population and communities, health and economy. The cumulative beneficial impacts of these points altogether could be better considered when assessing the sustainability of the potential development site. It is clear that where some of the Wymondham sites are awarded negative scores in the SA process, for example predominantly against SA1 Air Quality and Noise, SA2 Climate Change Mitigation and Adaptation, SA8 Health and SA14 Natural Resources, Waste and Contaminated Land, this is due to a lack of integrated mitigation, for example standard best practice mitigation usually implemented on such sites, a lack of survey information to properly assess potential impacts or a lack of knowledge of site design/masterplan commitments for example to habitat creation. Therefore, it could be argued that these scores are not realistic and the sites would likely result in more positive sustainable scores than those awarded.
- 2.16 When comparing sites in Wymondham to the sites that have been allocated outside of the Strategic Growth Area, it is clear these do not appear to have been selected on their sustainability credentials. For example, the appraisal of the sites in Loddon/Chedgrave (GNLP0312 Land off Beccles Road and GNLP0463R Langley Road, Chedgrave) is shown in Table 6.4: Sustainability impact matrix of the 138 site policies of the GNLP and Appendix F of the Regulation 19 SA Report. The sites are awarded negative scores against SA1 Air Quality and Noise, SA2 Climate Change, SA4 Landscape, SA8 Health, and SA12 Transport and Access to Services. Loddon and Chedgrave are not located within the strategic growth corridor and are located approximately 7km away from the nearest train station (Reedham, which does not have frequent services compared to the larger stations in Wymondham) and approximately 20km away from Norwich, with only small villages in their immediate surrounding area, with few facilities nearby. The sites would therefore likely require all new residents to use cars to access these facilities, rather than more sustainable modes of transport, which would worsen impacts on air quality. Loddon and Chedgrave have limited GP and dentist provision which would have negative implications for social infrastructure and the health and wellbeing of the population.

Loddon and Chedgrave are also located adjacent to the Broadland Ramsar and SPA site and the Broads SAC. The sites are awarded a neutral score for SA3 Biodiversity, where either no impacts are anticipated, or any impacts are anticipated to be negligible, however given the sensitivity of the sites identified above, it is anticipated that negative impacts, for example from recreation pressure, would be likely from development here.

- 2.17 In contrast, the sites at Wymondham, including the additional sites in Appendix D of the Regulation 19 SA Report, are located within close proximity to local facilities, including healthcare, public transport, leisure and employment opportunities, which would help to reduce the need for travel by car, thereby reducing emissions and impacts on air quality and climate change. Wymondham is also not located within proximity to European designated sites. This does not appear to have been taken into account for the sites in Wymondham. Therefore, the objectivity and parity of the assessment when assigning scores could be questioned. It is concluded that there are more suitable sites within the growth corridor that have not been adequately considered or included for allocation when it is clear from this review that the GNLP should prioritise development here.

Monitoring

- 2.18 We agree that the monitoring recommendations set out in Chapter 17 of the Regulation 19 SA report addresses our previous comments.

Non-Technical Summary

- 2.19 We agree that the NTS included at Volume 1 of the Regulation 19 SA report addresses our previous comments.

Reasonable Alternatives (Mitigation)

- 2.20 We agree that the post-mitigation impact scores for the reasonable alternative sites in Appendix E addresses our comments to some extent. However, the mitigation included in Appendix E comprises the potential mitigating influence of GNLP strategic policies and adopted Local Plan policies and does not include integrated mitigation, for example standard best practice mitigation usually implemented on such sites, or mitigation following survey information or committed to in the design/masterplan.

Summary of SA Review

- 2.21 Given the above, it is clear that some areas of the SA would potentially benefit from additional consideration.

- 2.22 Despite the improvements suggested above, the SA is not considered deficient and provides a comprehensive discussion around the likely effects of policy and site options as evidence supporting the GNLP as a reasonable strategy. Section 4 of the Regulation 19 SA Report sets out the uncertainties and difficulties of predicting effects including assumptions made about secondary data, the accuracy of publicly available information and subjective judgement. Section 4.8.3 outlines that, in terms of determining the sustainability performance against the SA Objectives, the precautionary principle has been used and a worst-case scenario approach followed. Section 4.11 describes the assumptions made for the specific topics of the SA Objectives Assessments, which is helpful, for example where up to date ecological surveys and/or landscape and visual impact assessments have not been available and have limited the assessment of sites.
- 2.23 Additional information to address the points summarised above would increase further the robustness of the SA and assist in achieving the right outcome at Examination.

3.0 Site Appraisal

Performance of Land North East of Wymondham

- 3.1 The site at Land North East of Wymondham performed well overall against the fifteen SA Objectives in the site appraisal undertaken as part of this SA Review (included at Appendix 2). The site was awarded a positive (+ or ++) score in 10 out of the 15 SA Objectives and neutral (0) score was awarded for 5 of the SA Objectives, for which no impacts or negligible impacts are anticipated. No negative (- or --) scores were awarded.
- 3.2 The current concept masterplan demonstrates that the development will add to the current services available in the area through the provision of land safeguarded for schools, a local centre and a health hub. The site has the potential to retain and enhance elements of the landscape and green infrastructure network and will provide a new Country Park. The concept masterplan would provide a network of new and enhanced pedestrian and cycling routes that permeate through the development site and connect to the wider surrounding area, which will benefit the health and wellbeing of the community as well as encourage future and existing residents to make short trips by non-motorised means.
- 3.3 The site is suitably located in proximity to local facilities, public transport, employment opportunities and green spaces in Wymondham, within walking distance or a bus journey from the bus stops on Norwich Common (B1172). The provision of integrated pedestrian and cycle routes mentioned above will provide direct connections to the public transport and local facilities. This will help to reduce pollution associated with motorised forms of transport and provide benefits for climate change mitigation and air quality.
- 3.4 The development will have a positive contribution to housing and a range of housing types, including affordable housing, will be provided which will meet a range of circumstances and needs in the community. The development presents the opportunity for better social connectivity with established communities in Wymondham and Hethersett. The development will also create new investment into the local area, providing benefits in terms of the economy and sustainability. The continued growth of North East Wymondham due to its strategic location along the Cambridge Norwich Growth Corridor, as set out within the SHMA Core Area and the NPA identified within the JCS, will help to promote Greater Norwich as a regional economic centre.
- 3.5 As part of the Environmental Impact Assessment (EIA) supporting the planning application for development at the site, an Environmental Statement (ES) has been prepared and will be submitted with the planning application. The site appraisal included the findings of the ES and

any additional supporting documents as necessary, including a Flood Risk Assessment (FRA), Drainage Strategy and Transport Assessment. In addition, a Construction Environmental Management Plan (CEMP) to be secured by a planning condition following planning approval will be prepared for the site in accordance with best practice measure and appropriate legislation, and therefore no likely impacts have been identified relating to air quality, dust, noise, flood risk or pollution.

Summary of Site Appraisal

- 3.6 The site appraisal of Land North East of Wymondham is based on our knowledge of the site's opportunities and the Promoters commitment to delivery. This review concludes that the site should be selected for inclusion within any proposed site allocations within the GNLP, based upon its performance against the SA Objectives.

4.0 Conclusion

- 4.1 There are some areas of the SA which would potentially benefit from further consideration which would increase further the robustness of the SA and assist in achieving the right outcome at Examination.
- 4.2 The potential development site Land North East of Wymondham should be selected for inclusion within any proposed site allocations within the GNLP based on its location, opportunities and performance against the SA Objectives, to aid sustainable development in this urban extension area. The Regulation 19 SA Report does not adequately reference the Cambridge Norwich Growth Corridor, SHMA Core Area or the NPA, when it is clear from this review that the GNLP should focus additional development here.
- 4.3 Clearer justification should be provided as to why growth is directed to settlements outside of the Strategic Growth Area. A comparison between sites in Wymondham to the sites that have been allocated outside of the Strategic Growth Area, for example sites at Loddon/Chedgrave, concludes that it is clear these sites do not appear to have been selected on their sustainability credentials. The SA does not provide rationale or certainty that all reasonable alternatives in Wymondham, beyond identified commitments, have been assessed for development. It is concluded that there are more suitable sites within the growth corridor that have not been adequately considered or included for allocation.
- 4.4 Wymondham represents a sustainable location for development in Greater Norwich and decision making and the GNLP should prioritise development along the Cambridge Norwich Growth Corridor, within the SHMA Core Area and the NPA.

APPENDIX 1:
SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

SUSTAINABILITY APPRAISAL COMPLIANCE REVIEW

	Compliance Key	Notes
<p><i>This is a compliance review against the requirements of the Regulations. It has not been undertaken by a legal professional. The SA process has been reviewed against the SEA Regulations and requirements of the Planning and Compulsory Purchase Act 2004 on SA. The following reports have been considered:</i></p> <p><i>2017 SA Scoping Report; 2018 Interim SA; Jan 2020 Regulation 18 (C) SA Report; and Jan 2021 Regulation 19 SA Report.</i></p>		Meets requirements
		Improvements suggested
		Risk of challenge. Does not meet requirements

SEA Regulations, Regulation 12 and Schedule 2 - Contents of Environmental Report

<p>1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.</p>	<p>Covered in 2017 SA Scoping Report, Section 4 of the 2018 Interim SA Report, Sections 1 and 2 of the Regulation 18 (C) SA Report and Sections 1, 3 and Appendix B of the Regulation 19 SA Report.</p> <p>The introduction section of the 2017 SA Scoping Report sets out the purpose and objectives of the GNLP. Section 4 of the 2018 Interim SA Report builds on this information and evaluates the GNLP Objectives against the Sustainability objectives. Section 1.2 of the Regulation 18 (C) SA Report outlines the GNLP area and states that 'the GNLP will guide development across the three districts up to 2038, providing both strategic policies and site allocations to meet demand for housing and employment, as well as other land use matters'. Appendix 1 of the 2017 SA Scoping Report lists the plans, programmes and broader sustainability strategies that are relevant to the preparation of the GNLP and to the SA and the implications for the SA.</p> <p>Section 1.5 of the Regulation 19 SA Report outlines the aim and objectives of the GNLP and Section 3.2 of the Regulation 19 SA Report confirms that the GNLP may be influenced by other plans, programmes or environmental protection objectives, policies and legislation and refers to the 2017 SA Scoping Report for an analysis of those relevant to the GNLP and SA process. Appendix B of the Regulation 19 SA Report also contains a review of plans, policies and programmes.</p> <p>Table 2.2 of the Regulation 19 SA Report states that the Cambridge Norwich Growth Corridor has been discussed in paragraph 13.1.18 of this SA report. Paragraph 13.1.18 of the Regulation 19 SA Report states that the Cambridge-Norwich Tech Corridor is predicated to be a future hotspot for economic growth and aims to develop up to 20,000 homes within 11 key areas along the route.</p> <p>Section 5.4.12 of the Regulation 19 SA Report explains that further to the appraisal work undertaken during the Regulation 18 (C) stage, the Councils considered an additional spatial strategy, and this new option was considered in the Regulation 18C Draft Strategy. The third principle of the growth strategy is 'focuses most of the growth in locations with the best access to jobs, services and existing and planned infrastructure in and around the Norwich urban area and the Cambridge-Norwich Tech corridor'.</p> <p>The Regulation 18 (C) SA report assessed this spatial strategy as part of Policy 1 – The Sustainable Growth Strategy. Policy 1 scores well against the SA Objectives impact matrix in Table 5.4 of the Regulation 19 SA Report, with just 4 out of 15 SA Objectives scoring negatively. This is elaborated on in Appendix C of the Regulation 19 SA Report Policy Assessments: Policy 1 – The Sustainable Growth Strategy, which explains that most of the housing, employment and infrastructure growth is focussed in the Strategic Growth Area and that this includes Greater Norwich's part of the Cambridge Norwich Tech Corridor, including the Norwich urban area, Hethersett and Wymondham.</p> <p>Section 5.4.16 of the Regulation 19 SA Report states that the spatial strategy/ growth strategy set out in the Regulation 19 Publication Draft Plan (2021) is the same as that presented in the Regulation 18 (C) Draft Strategy and Policy 1 of the GNLP sets out the same strategy but has been updated to reflect the most up-to-date figures in relation to housing provision. There has been no change in spatial strategy since the Regulation 18 (C) SA and therefore the SA findings for the appraisal of the spatial strategy remain the same at Regulation 19 (Table 5.4). It is clear that the Cambridge Norwich Growth Corridor forms an important part of the GNLP and the development of most of the housing growth should be focused in the Strategic Growth Area, in line with the principles of the selected spatial strategy Policy 1 set out, above. Therefore, it is suggested that the Cambridge Norwich Growth Corridor is still not adequately referenced in the Regulation 19 SA Report in terms of the relationship between the two, the SA conclusions and particularly in assessing alternative sites in Wymondham, considering this is highlighted as a key focus area for growth.</p> <p>No additional reference has been made to the SHMA Core Area and the NPA in the Regulation 19 SA Report. Additional justification should be provided within the site assessments in terms of selecting or discounting sites, outlining how the sites align with the aims, objectives and principles set out in the Cambridge Norwich Growth Corridor, SHMA Core Area and the NPA plans. For example, these are not mentioned in Appendix G: Reasons for Selection and Rejection of the Regulation 19 SA Report. The Regulation 19 SA Report does not refer to the recent Government commitment to the Oxford – Cambridge Spatial Planning Framework, which will have a status on par with the NPPF. Accordingly, any policies within Local Plans that fall within regions that have any geographical link to this region must be in accordance with the Framework as it emerges. The Oxford – Cambridge Spatial Planning Framework will focus on the delivery of up to 1 million new homes, as well as significant infrastructure and economic development. Therefore, the Regulation 19 SA Report should refer to the Oxford – Cambridge Planning Framework to ensure the Cambridge Norwich Growth Corridor is consistent with National Planning Policy as a focus for development and justified and effective strategy within the GNLP. See further detail on the reasons for selecting the alternatives below.</p>
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<p>2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>		<p>Covered in 2017 SA Scoping Report, Section 2 of the 2018 Interim SA Report, Section 2 of the Regulation 18 (C) SA Report and Section 3 of the Regulation 19 SA Report.</p> <p>Section 2 of the Regulation 18 (C) SA Report explains that the full baseline is provided in the 2017 SA Scoping Report, and this has been consulted on with relevant statutory bodies. Sections 1 to 15 of the 2017 SA Scoping Report provide commentary and data on a topic by topic basis. The topics cover the main sustainability issues relevant to the GNLP, which are considered to represent the current baseline position of the environment in Greater Norwich. Section 2.3. of the 2018 Interim SA Report provides a summary of the sustainability baseline and the likely evolution of the baseline without the implementation of the GNLP for each aspect of the environment.</p> <p>Section 3.3.2 of the Regulation 19 SA Report explains that the baseline environmental conditions of Greater Norwich have been updated in line with recent data and statistics and are presented in Sections 7 to 15.</p> <p>Section 3.5 and Table 3.2 of the Regulation 19 SA Report describes the likely evolution of the baseline without the GNLP.</p>
<p>3. The environmental characteristics of areas likely to be significantly affected.</p>		<p>Covered in 2017 SA Scoping Report, Section 2 of the 2018 Interim SA Report, Section 2 of the Regulation 18 (C) SA Report and Section 3 and Sections 7 to 15 (subsection 1 for each) of the Regulation 19 SA Report.</p>
<p>4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.</p>		<p>Covered in 2017 SA Scoping Report, Section 3 of the Regulation 18 (C) SA Report and Section 3 and Sections 7 to 15 (subsection 1 for each) of the Regulation 19 SA Report.</p> <p>Section 3 of the Regulation 18 (C) SA Report acknowledges the protection afforded to European designated ecological sites (e.g. The Broads Special Area of Conservation (SAC) and Broadland Special Protection Area (SPA)/Ramsar, and the River Wensum and Norfolk Valley Fens SACs) by the Habitats Regulations, in accordance with Article 6(3) of the EU Habitats Directive.</p> <p>Section 8 of the Regulation 19 SA Report considers the effects of the GNLP on biodiversity, including Internationally and European designated sites. Box 8.1 considers the threats or pressures to internationally and European designated biodiversity sites and explains that the HRA¹ undertaken for the Regulation 18 Draft Local Plan has considered the impact of the GNLP on the European sites in detail. Box 8.2 links between GNLP Policy 3 to address impacts of visitor pressure caused by residents of new development on European sites and the provision of mitigation in the form of providing, or providing funding for, green infrastructure to protect European sites, as set out in the HRA. Box 8.3 concludes that several allocated sites are in close proximity to European sites and that the HRA will provide further detail on the impact of the development within the GNLP on European designated sites, however 'at the time of writing, the draft HRA has not been able to provide conclusive findings but emerging findings suggest that subject to satisfactory resolution of the outstanding matters listed in the report (version dated 18th December 2020), there would be no adverse effect upon the integrity of any European site'.</p> <p>It is clear that the HRA and SA are better linked at the Regulation 19 Stage and the HRA has been referred to in the assessment of ecological effects, however given the need for assessments to be coordinated, it would be beneficial for the final HRA to be prepared prior to Examination and the SA to demonstrate how the final conclusions of the HRA process have been incorporated into the SA particularly when assessing the sites and the decisions made. The addition of Table 16.2, which includes an assessment of cumulative effects of the GNLP in relation to threats or pressures to European sites, is welcomed and perhaps the final HRA can add to this assessment further.</p>
<p>5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.</p>		<p>Covered in 2017 SA Scoping Report, Section 2 and Appendix A of the Regulation 18 (C) SA Report and Sections 3 and 4 and Appendix B of the Regulation 19 SA Report.</p> <p>Appendix 1 and Sections 1 to 15 of the 2017 SA Scoping Report provide an overview of the international, national, regional and local environmental protection guidance and legislation for each environmental topic relevant to the preparation of the GNLP and to the SA. This includes limits or standards including e.g. National Air Quality Objectives, Water Framework Directive, Condition of Sites of Special Scientific Interest (SSSI), Carbon Emissions Targets.</p> <p>Appendix A of the Regulation 18 (C) SA Report and Appendix A of the Regulation 19 SA Report includes the SA Framework and SA Objectives which shows how the assessment has considered those objectives and environmental considerations, and includes suggested indicators and targets, which ensures the SA framework is aligned with relevant local issues. Section 4 of the Regulation 19 SA Report outlines the topic-specific methodologies and assumptions that have been applied to the site appraisal process for specific SA Objectives which refers to environmental protection objectives, plans and guidance and how these environmental considerations have been taken into account.</p>
<p>6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as— (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil;</p>		<p>Covered in 2017 SA Scoping Report, Section 3 of the 2018 Interim SA Report, Sections 2, 3, 4 and Appendix A, B and C of the Regulation 18 (C) SA Report and Sections 3, 4, 7 to 16 and Appendix A, C, D, E, F of the Regulation 19 SA Report.</p> <p>Section 2.10-2.24 and Appendix A of the Regulation 18 (C) SA Report outlines the SA Objectives and Framework used to assess the alternatives for likely significant effects on the environment.</p> <p>Figure 84 of the 2017 Scoping Report sets out the SA Framework which includes sustainability themes, objectives related to each theme that the GNLP should be trying to achieve, the decision-making criteria for site allocations and general policies, as well as suggested indicators and targets. Appendix A of the 2018 Interim SA Report provides narrative as to the criteria used to score each option against each SA Objective.</p>

¹The Landscape Partnership Ltd, December 2019, Habitats Regulations Assessment of Greater Norwich Regulation 18 Draft Plan for GNDP.

<p>(g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).</p>		<p>Appendix A of the Regulation 19 SA Report outlines the SA Framework. Section 4 of the Regulation 19 SA Report sets out the methodology used to score significant effects. Table 4.5 of the Regulation 19 SA Report sets out the criteria that has been used to score significant effects for each SA Objective for each alternative option (major negative to major positive). Boxes 4.1 to 4.15 present topic specific methods and assumptions which offer further insight into how each option was scored and explains the selection of reasonable alternatives.</p> <p>The following within the Regulation 19 SA Report presents the SA matrices' assessments:</p> <ul style="list-style-type: none"> • Section 5 sets out the assessment of reasonable alternatives at different iterations of the SA including policy options and site options. The appraisal of site options at Regulation 19 includes an additional 107 reasonable alternative sites which were considered post Regulation 18C and the SA appraisals for these additional sites (pre-mitigation) are set out within Appendix D; • Section 6 outlines the preferred approach for: <ul style="list-style-type: none"> - a) the final strategic policies within the GNLP (following comments received during the Regulation 18 consultations) and includes a sustainability impact matrix of the twelve strategic policies of the GNLP, with explanatory text in Appendix C, and; - b) the site policies including the sustainability impact matrix of the allocated 138 sites of the GNLP, with explanatory text in Appendix F. • Sections 7 to 15 include the whole plan appraisal which presents the assessment of the likely significant effects associated with the GNLP in relation to air, biodiversity, flora and fauna, climatic factors, cultural heritage, human health, landscape, population and material assets, soil and water, with each including sections on baseline, impacts, mitigation and residual effects. The topics have been appraised in terms of plan-wide impacts and draw on all aspects of the SA process, including the findings presented for the assessment of strategic policies and site policies (Appendices C and F, as above). <p>Section 18 of the Regulation 19 SA Report outlines how the SA has influenced the GNLP and Tables 18.1 and 18.2 conclude the likely residual positive and negative sustainability effects of the GNLP proposals.</p> <p>Section 6.3.2 of the Regulation 19 SA Report explains that the assessments in Sections 7 to 15 include consideration of the impacts arising as a consequence of the inter-relationship between the different topics and identify secondary, cumulative and synergistic effects where they arise. However, there is just a singular mention of a cumulative adverse impact on biodiversity in Box 8.1, which raises questions as to how well the assessments have properly considered cumulative effects. Table 2.4 of the Regulation 18 (C) SA Report shows that a site which contributes to a cumulative significant effect, amongst other factors, is likely to be awarded a score of major negative. Cumulative effects are not mentioned in relation to major positive scores and there is no explanation of how these are considered within each topic. In the assessments it is unclear as to which options/topics were scored major negative due to cumulative effects and whether the rest were negligible/had no cumulative impacts. This has not been rectified within the Regulation 19 SA Report. It would be helpful to clarify this.</p> <p>Notwithstanding this, the approach to the assessment of cumulative effects has improved at the Regulation 19 SA Stage. The Regulation 19 SA Report includes a dedicated cumulative effects assessment exercise in Section 16 which states that cumulative effects are those that arise when the total significant effects of the GNLP and assessed alongside known existing underlying trends and other plan and programmes. Section 18.2.4 of the Regulation 19 SA Report states that some of the identified residual adverse effects are associated with greater levels of uncertainty and potentially could be considered to be greater in magnitude, for example residual adverse effects associated with air quality and climate change. The Plan includes measures to reduce these effects, however, these are effects that are predicted to happen with or without the Plan and when considered cumulatively, a residual adverse effect would still be likely to occur. The assessment could be made stronger by considering how each of the SA Objectives might interact with one another.</p>
<p>7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</p>		<p>Covered in 2017 SA Scoping Report, Section 9 of the 2018 Interim SA Report, Section 3 of the Regulation 18 (C) SA Report and Sections 7-15 and 18 and Appendix E of the Regulation 19 SA Report.</p> <p>Section 2.6.5 of the Regulation 18 (C) SA Report states that 'the nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed'.</p> <p>Section 3.3 of the Regulation 18 (C) SA Report identifies the mitigation and enhancement measures set out within the preferred policies of the GNLP and explains that these have been assessed within the SA process. Table 3.3 lists the potential adverse impacts that could arise following development at the alternative sites and lists which, if any, of the policies would be likely to help avoid these adverse impacts. If the policies would be unlikely to mitigate these adverse impacts, recommendations have been provided which are integrated in the GNLP throughout the plan-making process to help mitigate adverse impacts identified through the SA process.</p> <p>Appendix E of the Regulation 19 SA Report includes post-mitigation assessments of the 392 reasonable alternative sites considered throughout the SA process can. Section 5.6.9 states that the findings of these assessments were considered by the Councils in the selection of site allocations.</p> <p>Sections 7 to 15 of the Regulation 19 SA Report each include a section on Local Plan Mitigation which identifies the policy mitigation for identified impacts of the GNLP on that environmental topic. Section 18.2 identifies the residual effects following mitigation.</p> <p>Section 18.1.8 states that the SA helped suggest measures to mitigate some of the potential adverse impacts that were identified during the SA process which resulted in recommendations to the Councils in terms of amendments to policies incorporated within the GNLP through the consideration of mitigation at the Regulation 18C stage and the assessment in Appendix E of the Regulation 19 SA Report. These recommendations were incorporated into the final versions of the policies.</p>
<p>8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.</p>		<p>Covered in 2017 SA Scoping Report, Section 5, 6, 7 and 8 of the 2018 Interim SA Report, Sections 2, 3, 4 and Appendix A, B and C of the Regulation 18 (C) SA Report and Sections 5 and 6 and Appendix G of the Regulation 19 SA Review.</p> <p>Section 2.10-2.24 and Appendix A of the Regulation 18 (C) SA Report outlines the SA Objectives and Framework used to assess the alternatives. Figure 84 of the 2017 Scoping Report sets out the SA Framework which includes sustainability themes, objectives related to each theme that the GNLP should be trying to</p>

achieve, the decision-making criteria for site allocations and general policies, as well as suggested indicators and targets. Section 5 of the 2018 Interim SA Report and Section 2 of the Regulation 18 (C) SA Report presents the methodology used for the assessment of reasonable alternatives. Appendix A of the 2018 Interim SA Report provides narrative as to the criteria used to score each option against each SA Objective.

Section 2 of the Regulation 19 SA Report outlines the SA process to date. Section 3 and Appendix A outlines the SA Objectives and Framework used to assess the alternatives. Section 4 presents the methodology used for the assessment including an overview of the appraisal process at Section 4.4.

The SA process has considered each of the policies and alternative sites considered by the GNDP against the fifteen Sustainability Objectives agreed during Scoping. The assessment has used a matrix with a colour coded key, a method often used for the assessment of site options in SAs, to make the comparison of the positive and negative sustainability aspects of a site clear and consistent. A set of appraisal questions are used for each objective which ensures the SA considers each effect within clear parameters. Table 4.5 of the Regulation 19 SA Report sets out the criteria that has been used to score significant effects for each SA Objective for each alternative option (major negative to major positive). Boxes 4.1 to 4.15 present topic specific methods and assumptions which offer further insight into how each option was scored and explains the selection of reasonable alternatives.

Section 5 'Reasonable Alternatives' of the Regulation 19 SA Report sets out the assessment of reasonable alternatives at different iterations of the SA including policy options and site options.

Section 6 'The Preferred Approach' provides an appraisal against the SA Objective impact matrix for:

- The final strategic policies (detailed information in Appendix C), and;
- The allocated 138 site policies (detailed information in Appendix F).

Sections 7 to 15 include the whole plan appraisal which presents the assessment of the likely significant effects associated with the GNLN for each environmental topic. The topics have been appraised in terms of plan-wide impacts and draw on all aspects of the SA process, including the findings presented for the assessment of strategic policies and site policies (Appendices C and F, as above).

For the most part, the discussion around policy and site options is clear and evidence based and provides helpful clarity on why the GNLN is a reasonable strategy in terms of environmental impact and includes additional justification for the alternative policies/sites considered (Appendix C and F – detailed information). References are given to the evidence base supporting alternatives e.g. the sites identified in the GNLN Housing and Economic Land Availability Addendum (HELAA).

The number of iterations of the SA shows that the process has been iterative and that there has not been a foregone conclusion throughout. Figure 1.2, Table 1.1, Section 1.6 of the Regulation 18 (C) SA Report and Sections 2 and 5 of the Regulation 19 SA Report present a clear timeline of the stages of the plan-making and SA process, which includes:

- 'Call for Sites' phase;
- Regulation 18 Stage A 'Site Proposals and Growth Options' which consisted of approximately 600 site proposals as well as options for strategic policies;
- Regulation 18 Stage B 'New, Revised and Small Sites' included further submitted sites, revisions to some of the sites already consulted on and small sites, which total more than 200 sites; and
- Regulation 18 (C) SA Report, which provides an appraisal of the reasonable alternative sites and draft policies considered alongside the draft GNLN and includes further options provided by the plan-making team. This included 287 reasonable alternative sites, for residential, employment or mixed uses and eleven draft policies which are presented in the GNLN Regulation 18 Draft Plan. A cluster analysis of the sites has been undertaken. Sites within each cluster are generally expected to have similar effects against the SA Objectives.
- Regulation 19 SA Report. The appraisal of site options at Regulation 19 includes an additional 107 reasonable alternative sites which were considered post Regulation 18C and the SA appraisals for the additional sites are set out in Appendix D.

The reasonable alternative options for growth and policies are assessed within Sections 7 and 8 of the 2018 Interim SA Report and the policy assessments within the Regulation 18 (C) SA Report are derived from the policy alternatives assessed in the Interim SA.

Section 6 of Regulation 19 SA Report outlines the Preferred Approach and explains that following comments received during the Regulation 18 consultations and recommendations set out in the SA, the Councils have revisited the policies of the GNLN and lists the final selected strategic policies within the GNLN in Table 6.1. This includes Policy 1 – The Sustainable Growth Strategy, which, as mentioned above, focuses growth within the Cambridge Norwich Growth Corridor. Section 6.2 then outlines the 138 sites which the Councils have allocated within the GNLN following the assessment of reasonable alternative development sites.

Section 5 of the Regulation 19 SA Report explains that, in terms of the appraisal of the housing requirement, the Regulation 18 (C) SA Report assessed the impact of the development of 44,340 homes within Policy 1 and the Publication Draft Plan at Regulation 19 includes a further c. 5,000 dwellings in addition to the Regulation 18 (C) Draft Strategy, to take account of the 2018 household projections, making the total housing potential within Policy 1 49,492 dwellings. Table 5.1 and 5.2 show the SA Objectives appraisal matrices for Policy 1 at Regulation 18 (C) and Regulation 19, respectively. The performance of the two against the sustainability objectives remained very similar despite the change in housing requirements between Regulation 18 (C) and Regulation 19. The Regulation 19 SA Report appraises the additional 107 reasonable alternative sites which were considered post Regulation 18 (C) (Appendix D contains the assessment findings).

There are only two sites allocated within Wymondham in the Regulation 19 Plan (GNLP0354R Land at Johnson's Farm and GNLP3013 North of Tuttle Lane). This is surprising given Wymondham's key location within the preferred Strategic Growth Area which is focused around the main Cambridge Norwich Tech Corridor area, including Norwich, the North East Growth Triangle, the remainder of the Norwich Fringe, Hethersett and Wymondham and the recognition of the role and importance of the Cambridge Norwich Tech Corridor, as a clear and suitable location to focus growth and housing allocation. In particular, it is unclear how with a further c. 5,000 dwellings included at Regulation 19, to be included within Policy 1, there is not additional allocations afforded to Wymondham. In fact, at the

Regulation 18 (C) stage, twelve sites were presented within Wymondham as a strategic location for growth (Section B.51 within Appendix B of the Regulation 18 (C) SA Report presents the appraisal of the Wymondham cluster, comprising twelve sites surrounding the town of Wymondham) and now there are just two allocations, but an addition 5,000 houses proposed.

Appendix G of the Regulation 19 SA Report includes the reasons for selection and rejection of sites. The reasons for the rejection of sites within Wymondham, that have not been allocated within the GNL, for example GNL0525R and GNL0525AR North Wymondham include 'a contingency site or sites for 1,000 homes in Wymondham is not being sought' and that 'a third site allocation in Wymondham would be in excess of the strategic requirement for new homes as set out in the Part 1 Strategy'. The reasons for rejection somewhat contradict the reasons for including the Land at Johnson's Farm (GNL0354R) within the allocated sites, which states that 'a 1,000-home contingency is now not going ahead for Wymondham, but across the Greater Norwich area as a whole the overall housing number is increasing by 5,000' and that the larger allocation is selected because the uplift of 50 homes is helpful given the strategic decision (location within the Strategic Growth Area). This clearly promotes Wymondham as an important area for housing growth and therefore it is unclear why there are just two allocations and why additional reasonable alternatives beyond commitments have not been assessed/ Wymondham has been discounted from further development given the strategic growth area. In addition, reasons relating to how or why sites have been discounted on their sustainability credentials and how the SA has influenced this decision are not included. Therefore, it is unclear how the site selections have taken place and the robustness of the decision making could be questioned.

There is little reference to the Cambridge Norwich Growth Corridor and instead, additional sites have been allocated outside of this area. This is questionable when the approach taken by the Council is to focus on the Strategic Growth Area Cambridge Norwich Tech Corridor as a justified and effective strategy. There are a number of areas proposed for new allocations outside of the Strategic Growth Area, totalling 2,682 proposed new houses, in Aylsham, Diss, Harleston, Acle, Loddon/Chedgrave, Hingham, Blofield, Broadland Village Clusters. No clear justification is provided, particularly in terms of sustainability, as to why this growth is directed to settlements outside of the Strategic Growth Area. Within the Strategic Growth Area, the majority of homes identified are on existing commitments. The reasons for allocating each of the sites in Appendix G of the Regulation 19 SA Report include that 'the principle of development has been established by virtue of the existing local plan allocation' and 'allocation carried forward from the 2014 Norwich Local Plan.' This does not provide rationale or certainty that all reasonable alternatives in Wymondham, beyond identified commitments, have been assessed for development. This is, again, surprising due to Wymondham's location in the Strategic Growth Area. Therefore, the whole plan appraisal at Section 6.3 of the Regulation 19 SA Report for each environmental topic does not include all the potential reasonable alternative sites within the Strategic Growth Area.

At the Regulation 18 stage it was noted that following a review of the Wymondham site assessments, and the appraisal of the site 'North East Wymondham', in Appendix 2 of this report, it is clear that a) Wymondham justifiably represents a strategic location for growth and b) North East Wymondham should be included within any proposed site allocations within the GNL on its sustainability credentials. This conclusion stands at the Regulation 19 stage. The site North East Wymondham is suitably located in proximity to local facilities, public transport, employment opportunities and green spaces, and will add to the current services available in the area through the provision of land safeguarded for schools, a local centre and a health hub. The site has the potential to retain and enhance elements of the landscape, green infrastructure network and pedestrian and cycling routes in the existing and new community, providing benefits in relation to several objectives, including climate change mitigation and adaptation, biodiversity, population and communities, health and economy. The cumulative beneficial impacts of these points altogether could be better considered when assessing the sustainability of the potential development site. It is clear that where some of the Wymondham sites are awarded negative scores in the SA process, for example predominantly against SA1 Air Quality and Noise, SA2 Climate Change Mitigation and Adaptation, SA8 Health and SA14 Natural Resources, Waste and Contaminated Land, this is due to a lack of integrated mitigation, for example standard best practice mitigation usually implemented on such sites, a lack of survey information to properly assess potential impacts or a lack of knowledge of site design/masterplan commitments for example to habitat creation. Therefore, it could be argued that these scores are not realistic and the sites would likely result in more positive sustainable scores than those awarded.

When comparing sites in Wymondham to the sites that have been allocated outside of the Strategic Growth Area, it is clear these do not appear to have been selected on their sustainability credentials. For example, the appraisal of the sites in Loddon/Chedgrave (GNL0312 Land off Beccles Road and GNL0463R Langley Road, Chedgrave) is shown in Table 6.4: Sustainability impact matrix of the 138 site policies of the GNL and Appendix F of the Regulation 19 SA Report. The sites are awarded negative scores against SA1 Air Quality and Noise, SA2 Climate Change, SA4 Landscape, SA8 Health, and SA12 Transport and Access to Services. Loddon and Chedgrave are not located within the strategic growth corridor and are located approximately 7km away from the nearest train station (Reedham, which does not have frequent services compared to the larger stations in Wymondham) and approximately 20km away from Norwich, with only small villages in their immediate surrounding area, with few facilities nearby. The sites would therefore likely require all new residents to use cars to access these facilities, rather than more sustainable modes of transport, which would worsen impacts on air quality. Loddon and Chedgrave have limited GP and dentist provision which would have negative implications for social infrastructure and the health and wellbeing of the population. Loddon and Chedgrave are also located adjacent to the Broadland Ramsar and SPA site and the Broads SAC. The sites are awarded a neutral score for SA3 Biodiversity, where either no impacts are anticipated, or any impacts are anticipated to be negligible, however given the sensitivity of the sites identified above, it is anticipated that negative impacts, for example from recreation pressure, would be likely from development here. In contrast, the sites at Wymondham, including the additional sites in Appendix D of the Regulation 19 SA Report, are located within close proximity to local facilities, including healthcare, public transport, leisure and employment opportunities, which would help to reduce the need for travel by car, thereby reducing emissions and impacts on air quality and climate change. Wymondham is also not located within proximity to European designated sites. This does not appear to have been taken into account for the sites in Wymondham. Therefore, the objectivity and parity of the assessment when assigning scores could be questioned. It is concluded that there are more suitable sites within the growth corridor that have not been adequately considered or included for allocation when it is clear from this review that the GNL should prioritise development here.

Section 6 of the 2018 Interim SA Report and Section 2.7 of the Regulation 18 (C) SA Report sets out the uncertainties and difficulties of predicting effects including assumptions made about secondary data, the accuracy of publicly available information and subjective judgement. It also explains the brevity of explanation provided when certain judgments are made. Section 2.9 describes the assumptions made for the specific topics of the SA Objectives Assessments, which is helpful, for example where up to date ecological surveys and/or landscape and visual impact assessments have not been available and have limited the assessment of sites. Section 4.9 of the Regulation 19 SA Report details the limitations of predicting effects. Section 4.8.3 outlines that, in terms of determining the sustainability performance against the SA Objectives, the precautionary principle has been used and a worst-case scenario approach followed.

		Figure 1.2 of the Regulation 19 SA Report details the requirements of the SEA Directive and illustrates where these have been addressed in the report to show how the SA has met legislative requirements.
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.		<p>Covered in 2017 SA Scoping Report, Section 10 of the 2018 Interim SA Report, Appendix A of the Regulation 18 (C) SA Report and Section 17 of the Regulation 19 SA Report.</p> <p>The SA Framework in Appendix A of the Regulation 18 (C) SA Report sets out suggested indicators for each of the SA Objectives that should be used for monitoring the effects of the GNLP.</p> <p>Table 17.1 of the Regulation 19 SA Report details the proposals for monitoring adverse sustainability impacts of the GNLP including the indicators, scale and frequency of monitoring required and the target to identify success against its objectives for each environmental topic.</p>
10. A non-technical summary of the information provided under paragraphs 1 to 9.		Volume 1 of the Regulation 19 SA Report comprises the NTS.
Planning and Compulsory Purchase Act 2004 - Section 19 Requirements for SA		
Stages from Planning Practice Guidance Paragraph: 013 Reference ID: 11-013-20140306. PPG paragraph references provided below, where relevant.		
A Setting the context and objectives, establishing the baseline and deciding on the scope		
Identifying relevant policies, plans and programmes		<p>Covered in 2017 SA Scoping Report, Section 4 of the 2018 Interim SA Report, Sections 1 and 2 of the Regulation 18 (C) SA Report and Sections 1, 3 and Appendix B of the Regulation 19 SA Report.</p> <p>It is clear that the Cambridge Norwich Growth Corridor forms an important part of the GNLP and the development of most of the housing growth should be focused in the Strategic Growth Area, in line with the principles of the selected spatial strategy Policy 1 set out, above. Therefore, it is suggested that the Cambridge Norwich Growth Corridor is still not adequately referenced in the Regulation 19 SA Report in terms of the relationship between the two, the SA conclusions and particularly in assessing alternative sites in Wymondham, considering this is highlighted as a key focus area for growth. No additional reference has been made to the SHMA Core Area and the NPA in the Regulation 19 SA Report.</p>
Collecting baseline information		<p>Covered in 2017 SA Scoping Report, Section 2 of the 2018 Interim SA Report, Section 2 of the Regulation 18 (C) SA Report and Section 3 of the Regulation 19 SA Report.</p> <p>Section 3.3.2 of the Regulation 19 SA Report explains that the baseline environmental conditions of Greater Norwich have been updated in line with recent data and statistics and are presented in Sections 7 to 15.</p> <p>Section 3.5 and Table 3.2 of the Regulation 19 SA Report describes the likely evolution of the baseline without the GNLP.</p>
Identifying environmental and sustainability issues		<p>Covered in 2017 SA Scoping Report, Section 3 of the 2018 Interim SA Report, Sections 2, 3, 4 and Appendix A, B and C of the Regulation 18 (C) SA Report and Section 3,4 and Sections 7 to 15 (subsection 1 for each) and 16 and Appendix A, C, D, E, F of the Regulation 19 SA Report.</p> <p>Section 3 of the Regulation 18 (C) SA Report acknowledges the protection afforded to European designated ecological sites (e.g. The Broads Special Area of Conservation (SAC) and Broadland Special Protection Area (SPA)/Ramsar, and the River Wensum and Norfolk Valley Fens SACs) by the Habitats Regulations, in accordance with Article 6(3) of the EU Habitats Directive.</p> <p>Section 8 of the Regulation 19 SA Report considers the effects of the GNLP on biodiversity, including Internationally and European designated sites. Box 8.3 concludes that several allocated sites are in close proximity to European sites and that the HRA will provide further detail on the impact of the development within the GNLP on European designated sites, however 'at the time of writing, the draft HRA has not been able to provide conclusive findings but emerging findings suggest that subject to satisfactory resolution of the outstanding matters listed in the report (version dated 18th December 2020), there would be no adverse effect upon the integrity of any European site'. It is clear that the HRA and SA are better linked at the Regulation 19 Stage and the HRA has been referred to in the assessment of ecological effects, however given the need for assessments to be coordinated, it would be beneficial for the final HRA to be prepared prior to Examination and the SA to demonstrate how the final conclusions of the HRA process have been incorporated into the SA particularly when assessing the sites and the decisions made. The addition of Table 16.2, which includes an assessment of cumulative effects of the GNLP in relation to threats or pressures to European sites, is welcomed and perhaps the final HRA can add to this assessment further.</p> <p>Appendix A of the Regulation 19 SA Report outlines the SA Framework used to assess the alternatives for likely significant effects on the environment. Section 4 of the Regulation 19 SA Report sets out the methodology used to score significant effects. Table 4.5 of the Regulation 19 SA Report sets out the criteria that has been used to score significant effects for each SA Objective for each alternative option (major negative to major positive). Boxes 4.1 to 4.15 present topic specific methods and assumptions which offer further insight into how each option was scored and explains the selection of reasonable alternatives. The SA process has considered each of the policies and alternative sites in the GNLP against the fifteen Sustainability Objectives agreed during Scoping, presented in Appendix C and F.</p> <p>Section 6.3.2 of the Regulation 19 SA Report explains that the assessments in Sections 7 to 15 include consideration of the impacts arising as a consequence of the inter-relationship between the different topics and identify secondary, cumulative and synergistic effects where they arise. However, there is just a singular mention of a cumulative adverse impact on biodiversity in Box 8.1, which raises questions as to how well the assessments have properly considered cumulative effects. Table 2.4 of the Regulation 18 (C) SA Report shows that a site which contributes to a cumulative significant effect, amongst other factors, is likely to</p>

		<p>be awarded a score of major negative. Cumulative effects are not mentioned in relation to major positive scores and there is no explanation of how these are considered within each topic. In the assessments it is unclear as to which options/topics were scored major negative due to cumulative effects and whether the rest were negligible/had no cumulative impacts. This has not been rectified within the Regulation 19 SA Report. It would be helpful to clarify this.</p> <p>Notwithstanding this, the approach to the assessment of cumulative effects has improved at the Regulation 19 SA Stage. The Regulation 19 SA Report includes a dedicated cumulative effects assessment exercise in Section 16 which states that cumulative effects are those that arise when the total significant effects of the GNLP and assessed alongside known existing underlying trends and other plan and programmes. Section 18.2.4 of the Regulation 19 SA Report states that some of the identified residual adverse effects are associated with greater levels of uncertainty and potentially could be considered to be greater in magnitude, for example residual adverse effects associated with air quality and climate change. The Plan includes measures to reduce these effects, however, these are effects that are predicted to happen with or without the Plan and when considered cumulatively, a residual adverse effect would still be likely to occur. The assessment could be made stronger by considering how each of the SA Objectives might interact with one another.</p>
Identifying appraisal objectives		<p>Covered in 2017 SA Scoping Report, Sections 3 and 5 of the 2018 Interim SA Report, Section 2 and Appendix A of the Regulation 18 (C) SA Report and Section 4 of the Regulation 19 SA Report.</p> <p>Figure 84 of the 2017 Scoping Report sets out the SA Framework which includes sustainability themes, objectives related to each theme that the GNLP should be trying to achieve, the decision making criteria for site allocations and general policies, as well as suggested indicators and targets. Appendix A of the Regulation 19 SA Report outlines the SA Framework used to assess the alternatives. Section 4 of the Regulation 19 SA Report sets out the methodology used to score significant effects for each SA Objective.</p>
Consulting on the scope of the appraisal		<p>Covered in 2017 SA Scoping Report, 2018 Interim SA Report, Sections 1 and 2 of the Regulation 18 (C) SA Report and Section 2 of the Regulation 19 SA Report.</p> <p>Consultation on the scope of the SA has been undertaken with Historic England, Natural England, the Environment Agency and other relevant bodies.</p> <p>Table 2.2 of the Regulation 19 SA Report includes the comments received in response to the Regulation 18 (C) Consultation and how these have been addressed in the Regulation 19 SA Report. The explanation above demonstrates that we do not believe all comments have been thoroughly addressed, particularly with regards to alternative options.</p>
B Developing and refining options and assessing effects		
Developing and refining the alternative options for the plan Paragraph: 018 Reference ID: 11-018-20140306		<p>Covered in 2017 SA Scoping Report, Section 5 of the 2018 Interim SA Report, Sections 2, 3, 4 and Appendix A, B and C of the Regulation 18 (C) SA Report and Sections 5 and 6 and Appendix G of the Regulation 19 SA Report.</p> <p>See detailed commentary within response to question 8. above.</p>
Predicting and evaluating the significant effects of the options and alternatives		<p>Covered in 2017 SA Scoping Report, Sections 7 and 8 of the 2018 Interim SA Report, Sections 2, 3, 4 and Appendix A, B and C of the Regulation 18 (C) SA Report and Sections 6 to 15 and Appendix C, D and F of the Regulation 19 SA Report.</p> <p>Section 5 'Reasonable Alternatives' of the Regulation 19 SA Report sets out the assessment of reasonable alternatives at different iterations of the SA including policy options and site options.</p> <p>Section 6 'The Preferred Approach' provides an appraisal against the SA Objective impact matrix for:</p> <ul style="list-style-type: none"> - The final strategic policies (detailed information in Appendix C), and; - The allocated 138 site policies (detailed information in Appendix F). <p>Sections 7 to 15 include the whole plan appraisal which presents the assessment of the likely significant effects associated with the GNLP for each environmental topic. The topics have been appraised in terms of plan-wide impacts and draw on all aspects of the SA process, including the findings presented for the assessment of strategic policies and site policies (Appendices C and F, as above).</p> <p>See detailed commentary within response to question 8. above.</p>
Considering ways of mitigating adverse effects and maximising beneficial impacts		<p>Covered in 2017 SA Scoping Report, Section 9 of the 2018 Interim SA Report, Section 3 of the Regulation 18 (C) SA Report and Sections 7-15 and 18 and Appendix E of the Regulation 19 SA Report.</p>
Proposing measures to monitor significant effects Paragraph: 025 Reference ID: 11-025-20140306		<p>Covered in 2017 SA Scoping Report, Section 10 of the 2018 Interim SA Report, Appendix A of the Regulation 18 (C) SA Report and Section 17 of the Regulation 19 SA Report.</p> <p>Table 17.1 of the Regulation 19 SA Report details the proposals for monitoring adverse sustainability impacts of the GNLP including the indicators, scale and frequency of monitoring required and the target to identify success against its objectives for each environmental topic.</p>
C. Preparing the Sustainability Report - Including the SEA Requirements		
		No major deficiencies. Some further explanation suggested to be remedied prior to Examination, as set out above and in the accompanying report.
D. Seek representations on the SA report from consultation bodies and the public		

Paragraph: 020 Reference ID: 11-020-20140306		Covered in 2017 SA Scoping Report and each subsequent report.
E. Post adoption reporting and monitoring		
Paragraph: 025 Reference ID: 11-025-20140306	N/A	To be done after adoption of the Local Plan.

APPENDIX 2:
SITE APPRAISAL NORTH EAST WYMONDHAM

SITE APPRAISAL NORTH EAST WYMONDHAM

Score	Description
--	Likely to result in a major negative effect.
-	Likely to result in a minor negative effect.
0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
+/-	It is entirely uncertain whether impacts would be positive or negative.
+	Likely to result in a minor positive effect.
++	Likely to result in a major positive effect.

SA Objective	Decision making criteria for site allocations and general polices	Score	Comments
<p>1. Air Quality and Noise (ref: SA1)</p> <p>Minimise air, noise and light pollution to improve wellbeing.</p>	<ul style="list-style-type: none"> Will it have a significant impact on AQMAs in Norwich city central and Hoveton? Will it minimise impact on air quality? Will it minimise the impact of light and noise pollution? 	0	<p>The site is not located within an Air Quality Management Area (AQMA). The nearest AQMA is Central Norwich, which is located approximately 11.4km to the north east of the site and is declared an AQMA for Nitrogen dioxide (NO₂).</p> <p>The proposed end use of the site is primarily for residential purposes and is in keeping with existing uses in the surrounding area. North East Wymondham has experienced recent growth over the last 10 years that extends built and committed development along Norwich Common and Tuttle's Lane towards Melton Road. The Site is located in an area that has been subject to a number of planning applications and appeals which has culminated in consent for approximately 1,700 residential dwellings forming an urban extension to Wymondham. The development is therefore not anticipated to cause significant impacts in relation to air quality, light and noise pollution, when compared to the existing site and surrounding uses.</p> <p>Air Quality and Noise ES chapters have been prepared and will be submitted with the planning application for development at the site.</p> <p>During the construction phase of the development, dust, emissions and noise would be generated in association with plant and vehicles. Dust, emissions and noise would be managed in accordance with standard best practice mitigation measures, implemented through a CEMP secured by a planning condition, in accordance with all relevant legislation, and is not anticipated to generate significant adverse effects.</p> <p>There would be emissions from vehicle exhausts and energy emissions associated with up to 650 new residential dwellings during the operation of the proposed development. The assessment indicates that pollutant levels at sensitive locations across the site were below the relevant air quality objectives and the location is considered suitable for residential use. The site is in close proximity to local facilities and public transport within Wymondham and Hethersett, reducing the need for car travel, including:</p> <ul style="list-style-type: none"> Education facilities, healthcare, supermarkets, retail, restaurants, recreation and leisure facilities; Wymondham Rail Station is located approximately 2.8km to the south west of the site, with regular direct services to Norwich, Thetford, Cambridge and Ely. The station is served directly by bus route 14/14A, or can be reached on foot from Wymondham town centre within an average walking time of less than 10 minutes; and Bus services, with the nearest bus stops currently provided on Norwich Common (B1172), approximately 750m to the south east of the site, with services running to Norwich approximately every hour. Services also run from Tuttle's Lane East to the south of the site to Wymondham town centre approximately every 20 minutes. <p>The development includes for new facilities comprising a local centre, land safeguarded for a 2-form entry primary school, land safeguarded for potential 6th form college provision, open space and will include pedestrian and cycling access and will encourage sustainable travel to and within the site, thereby further mitigating significant impacts on air quality.</p> <p>The noise assessment was based on the findings of an acoustic survey. The assessment shows that in the proposed dwelling locations, suitable internal sound levels would be achievable with windows closed and standard thermal double glazing. The location is considered suitable for residential use and no significant noise impacts are anticipated.</p> <p>All external lighting installations are to be designed in line with the Institution of Lighting Professionals (ILP) Guidance notes on reduction of obtrusive light.</p>

SA Objective	Decision making criteria for site allocations and general polices	Score	Comments
<p>2. Climate Change Mitigation and Adaptation (ref: SA2)</p> <p>Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change.</p>	<ul style="list-style-type: none"> • Will it minimise CO₂ emissions? • Will it support decentralised and renewable energy generation? • Will it minimise the risk of fluvial or surface water flooding? 	+	<p>The development will reduce the need to travel far as the site is well connected to local facilities, public transport and employment opportunities, within Wymondham and Hethersett. The site is strategically located close to Norwich, Thetford, Cambridge and Ely, all which are accessible along the public transport corridor. Elm Farm Business Park is located adjacent to the eastern extent of the site.</p> <p>In addition, the development includes for the provision of a local centre, land safeguarded for a 2-form entry primary school, land safeguarded for potential 6th form college provision, open space and will create and enhance pedestrian and cycling routes, to encourage more sustainable modes of transport. This will help to reduce carbon emissions which will have benefits for climate change mitigation and adaptation. The concept masterplan shows that the development will enhance the green infrastructure network through the provision of a country park, open space and landscaping, which will increase mitigation and adaptation/resilience to climate change.</p> <p>A Water Resources and Flood Risk ES chapter, supported by a FRA and Drainage Strategy, has been prepared and will be submitted with the planning application. The FRA provides a review of desk-based information related to flood risk and drainage to determine the suitability of the site for development. The site is located fully within Flood Zone 1 (low risk). The Drainage Strategy will ensure surface water run-off and foul water drainage from the development are appropriately managed in a sustainable way now and into the future, including allowance for climate change. The onsite sewers are likely to be adopted by Anglian Water.</p> <p>The surface water drainage strategy is to discharge surface water runoff to ground via attenuation using Sustainable Drainage Systems (SuDS) to reduce flood risk. At this stage, primary features include ponds, to provide the required storage in suitable locations across the site and these could be designed to consider wider environmental net gains such as amenity value and ecological enhancement. This could include designing areas of permanent water, wetlands and reedbeds, varying the bank slopes of basins etc. The scheme will be future proofed so that it is resilient to an increase in extreme weather events associated with climate change and potential flooding.</p>
<p>3. Biodiversity, Geodiversity and Green Infrastructure (ref: SA3)</p> <p>Protect and enhance the area's biodiversity and geodiversity assets and expand the provision of green infrastructure.</p>	<ul style="list-style-type: none"> • Will it minimise impact on designated sites and important species and habitats? • Could it provide opportunities for bio- or geo-diversity enhancement? • Could it contribute to green infrastructure networks? • Will it help minimise the impact on air quality at designated sites? • Will it ensure that current ecological networks are not compromised and future improvements in habitat connectivity are not prejudiced? 	++	<p>The site primarily comprises undeveloped arable land. Boundary vegetation comprises a mixture of hedgerow, semi-natural woodland, coniferous and broadleaved plantation woodland. There are areas of grassland and trees along field boundaries. There is also a number of small ponds at various places along the site boundary. The eastern parcel of the site includes Kett's Oak, which is an ancient oak tree and is one of the 50 Great British Trees. The site presents good opportunities for enhancement and connectivity to surrounding sites.</p> <p>A Biodiversity ES chapter has been prepared for the site and will be submitted with the planning application. The chapter is based on the findings of a desk study, an Extended Phase 1 Habitat Survey (June 2019), and specific faunal surveys for bats, badger, breeding birds, Great Crested Newts and reptiles. The survey reports are included as appendices to the ES chapter.</p> <p>The site itself is not covered by any statutory designations. The following are located within 10km:</p> <ul style="list-style-type: none"> • Toll's Meadow, Wymondham Local Nature Reserve (LNR) is located approximately 2.2km to the southwest of the site; • Lower Wood, Ashwellthorpe SSSI is located approximately 4.6km to the south of the site; • Norfolk Valley Fens Special Area of Conservation (SAC) is located approximately 6.2km to the north west of the site; and • River Wensum SAC is located approximately 8.2km to the north of the site. <p>The potential for significant impacts on these receptors has been assessed within the ES Biodiversity chapter. The HRA of the draft GNLP has been reviewed. Although the plan does not specifically assess the development, it considers overall proposed growth within the region and is therefore relevant in terms of identifying likely adverse effects. The majority of designated ecologically sensitive sites are located a substantial distance from the site, effects are therefore unlikely. It is considered that the development will provide sufficient areas of public open space which will adequately mitigate for any potential recreational impacts.</p> <p>The following mitigation measures have been incorporated into the design of the development to ensure there are no significant impacts on protected species, habitats or sites:</p> <ul style="list-style-type: none"> • Construction safeguards to be secured under a CEMP (and European Protected Species licence in relation to Great Crested Newt); • Detailed design of the built development's layout to retain key habitat areas, comprising the majority of mature trees, hedgerows and ponds (and avoid backing onto sensitive habitat areas); • Provision of open space areas forming green infrastructure corridors through and around the built development areas; • Creation of a large area of open space in the eastern parcel of the site forming a country park; and • implementation of a SuDS scheme and lighting design, to be secured under future reserved matters applications for the detailed design of the Development. <p>Such measures are considered to avoid or minimise any significant adverse effects resulting from the development. A range of enhancement measures have been identified to provide gains in biodiversity across the site, including habitat creation and enhancement and provision of new nesting and shelter opportunities for faunal species. It is considered that the development would result in an overall gain in the existing ecological interest supported by the site, with significant benefits anticipated in respect of habitats, bat species, birds, invertebrates, reptiles and Great Crested Newts. This will ensure compliance with national and local planning policy.</p>

SA Objective	Decision making criteria for site allocations and general polices	Score	Comments
4. Landscape (ref: SA4) Promote efficient use of land, while respecting the variety of landscape types in the area.	<ul style="list-style-type: none"> Will it minimise impact on the landscape character of the area, including the setting of the Broads? Will it enable development of previously developed land? Will it make efficient use of land? 	0	<p>The site is not within or within proximity to an Area of Outstanding Natural Beauty (AONB).</p> <p>A Landscape and Views ES chapter has been prepared for the site and will be submitted with the planning application. The assessment concluded that although the land within the site would change in character, the key landscape features that contribute to the character of the surrounding landscape would be retained, maintaining a physical and visual enclosure of substantial vegetation which contains the potential visual effects of existing development from surrounding areas of countryside.</p> <p>The screening and context provided by existing features, would effectively limit the visual impact of the Development from surrounding areas.</p> <p>The impact of the development on the character of adjacent areas would be further minimised by any landscape strategy that is implemented as mitigation for the development to reinforce and enhance existing landscape features to that contain views and deliver a cohesive open space framework that reinforces the characteristic pattern of the wider Wymondham settled plateau.</p> <p>Furthermore, the Kett's Oak Common country Park would ensure that the gap between the settlements of Wymondham and Heathersett would remain in open in perpetuity and would secure a significant area for community use where the increased levels of publicly accessible greenspace would increase the opportunities for access to historic landscape elements as well as recreation. Overall, the landscape and visual assessment has identified a small number of significant effects but none of which would be considered unacceptable in landscape or visual terms.</p> <p>Whilst the site does not use previously developed land and instead involves the development of agricultural land, the concept masterplan shows that the site will make efficient use of land, as it will have a positive contribution to housing, local facilities and green infrastructure enhancements. The Site is located in an area that has been subject to a number of planning applications and appeals which has culminated in consent for approximately 1,700 residential dwellings forming an urban extension to Wymondham. This creation of a new community in a suitable and sustainable location makes efficient use of land.</p>
5. Housing (ref: SA5) Ensure that everyone has good quality housing of the right size and tenure to meet their needs.	<ul style="list-style-type: none"> Will it ensure delivery of housing to meet needs in appropriate locations? Will it deliver affordable housing and other tenures to meet needs? Will it ensure a variety in the size and design of dwellings, to meet a range of circumstances and needs? 	++	<p>The development will have a positive contribution to housing.</p> <p>The development will provide up to 650 residential units, of which 33% will be affordable and 67% will be market. The development will provide a mix of dwelling sizes, from 1-bed flats to 5-bed houses. The range of accommodation provided will meet a range of circumstances and needs in the community.</p> <p>The site is located within proximity of local facilities, public transport and employment opportunities within Wymondham and Hethersett. The site is strategically located close to Norwich, Thetford, Cambridge and Ely, all which are accessible along the public transport corridor. Elm Farm Business Park is located adjacent to the eastern extent of the site. The development will enhance connectivity to these.</p>
6. Population and Communities (ref: SA6) Maintain and improve the quality of life of residents.	<ul style="list-style-type: none"> Will it enhance existing, or provide new community facilities? Will promote integration with existing communities? 	++	<p>The site will create a network of new and enhanced pedestrian and cycling routes that permeate through the development site and connect to the wider surrounding area, which will improve accessibility to local facilities, improving the quality of life of residents.</p> <p>The development includes the provision of a local centre comprising a total of up to 1,950sqm of floorspace. Within the local centre, the development will provide up to 600sqm of a food store, up to 300sqm of supporting retail, up to 500sqm for a community hub and up to 550sqm for a health hub. The development will provide land safeguarded for a 2-form entry primary school and land safeguarded for 6th Form College provision. The development includes the provision of open green space, a Country Park and leisure facilities. These new facilities would not only be beneficial for new residents but also for the existing surrounding communities.</p> <p>The development presents the opportunity for better social connectivity with established communities in Wymondham and Hethersett, which is beneficial for the well-being of communities. The development will be designed to provide safe areas of public realm and open space which will create a place for residents and communities to mix. North East Wymondham has experienced recent growth over the last 10 years that extends built and committed development along Norwich Common and Tuttle's Lane towards Melton Road. The Site is located in an area that has been subject to a number of planning applications and appeals which has culminated in consent for approximately 1,700 residential dwellings forming an urban extension to Wymondham. This provides good opportunity for integration between communities.</p>
7. Deprivation (ref: SA7) To reduce deprivation.	<ul style="list-style-type: none"> Will it help to reduce deprivation? 	+	<p>According to the Index of Multiple Deprivation (IMD)¹¹, the site is located in the Lower Super Output Areas (LSOA) (i.e. neighbourhoods) South Norfolk 007C, which is ranked 26,560 out of 32,844 LSOAs in England where 1 is the most deprived LSOA, and South Norfolk 005C which is ranked 23,562. This is amongst the 20-30% least deprived neighbourhoods in the country.</p> <p>As above, the development will provide a positive contribution to housing and will include a mix of dwelling sizes and tenures (including 33% affordable housing) which will help to reduce deprivation levels by meeting a range of needs and circumstances within the community and ensuring everyone has access to good quality housing. As outlined above, the development will improve access to local facilities, healthcare, public transport and employment opportunities for new and existing residents and this will help to reduce deprivation further.</p> <p>A Population and Human Health ES chapter has been prepared and will be submitted with the planning application.</p>

¹¹ Index of Multiple Deprivation, 2015, available at: <https://dclgapps.communities.gov.uk/imd/idmap.html>

SA Objective	Decision making criteria for site allocations and general polices	Score	Comments
			<p>The assessment concluded that construction of the development is likely to produce employment for an average of 117 full time equivalent (FTE) workers per month, over a 96-month period, providing a temporary beneficial effect on employment. During operation, a permanent beneficial effect on employment was identified as a result of the between 48 and 60 net additional jobs created by the development's provision of retail, community and health facilities floorspace. The creation of this employment will help to reduce deprivation further.</p> <p>The health of people within the community is a contributing factor to levels of deprivation. The provision of new and enhanced pedestrian and cycling routes that permeate through the development site and connect to the wider surrounding area, new publicly accessible green open space, a Country Park and leisure and recreation opportunities will likely improve physical activity rates and mental wellbeing in the community, thereby reducing deprivation further.</p> <p>The quality of the surrounding environment is also a contributing factor to levels of deprivation. The development will be designed to provide attractive and safe areas of public realm and open space which will create a place for residents and communities to mix and help reduce deprivation further.</p>
<p>8. Health (ref: SA8)</p> <p>To promote access to health facilities and promote healthy lifestyles.</p>	<ul style="list-style-type: none"> Will it maximise access to health services, taking into account the needs of an ageing population? Will it promote healthy lifestyles? Will it avoid impact on the quality and extent of existing assets, such as formal and informal footpaths? 	+	<p>The site will create a network of new and enhanced pedestrian and cycling routes that permeate through the development site and connect to the wider surrounding area, which will improve the accessibility to health care and will be suitable for all user groups (elderly, mobility impaired and use of walking frames/scooters, parents with pushchairs). Residents would be more likely to walk to facilities, improving physical activity rates and promoting healthy lifestyles.</p> <p>The site is in close proximity of Wymondham and Norwich, which comprise numerous healthcare facilities. There are also opportunities for recreational and physical activities located within the area surrounding the site, for example sports clubs, leisure centres and parks.</p> <p>A Population and Human Health ES chapter has been prepared and will be submitted with the planning application. The assessment identified that there is spare capacity within the existing five GP branches in the study area, sufficient to meet the needs of the 1,463 new residents. However, the development proposes a new local centre and Health Hub which is likely to provide a new GP surgery. The provision of a new GP surgery will more than meet the needs arising from the development and therefore it is considered to have a beneficial effect on access to health facilities. This would not only be beneficial for new residents but also for the existing surrounding communities.</p> <p>The provision of, and connection to, pedestrian and cycling routes, new publicly accessible green open space, a Country Park and leisure and recreation opportunities will likely improve physical activity rates and mental wellbeing in the community. Careful design will ensure noise is not significant for end users so that it does not impact on health and quality of life. Development generated traffic and operational noise would not be significant.</p>
<p>9. Crime (ref: SA9)</p> <p>To reduce crime and the fear of crime.</p>	<ul style="list-style-type: none"> Will it help design out crime from new development? 	+	<p>The development will be designed to provide safe areas of public realm and open space which will create a place for residents and communities to mix. Pedestrian and cycling routes will run throughout the site to create safe modes of transport for non-motorised users. A lighting strategy will be prepared for the scheme and appropriate lighting will be implemented throughout the design, which will assist in reducing fear of crime and creating a safe built environment.</p>
<p>10. Education (ref: SA10)</p> <p>To improve skills and education.</p>	<ul style="list-style-type: none"> Will it enable access to education and skills training? 	+	<p>The site is located within proximity of numerous education facilities in Wymondham, Hetherset and Norwich and will provide connectivity to these, enabling access to education and skills training.</p> <p>A Population and Human Health ES chapter has been prepared and will be submitted with the planning application. The assessment concluded that the forecast surplus provision of 362 primary school places in the Wymondham and Hetherset Primary Phase Planning Area at 2022/23 would more than meet the demand for primary school places arising from the Development (i.e. 167 pupils).</p> <p>In addition, the development includes for the provision of a local centre, land safeguarded for a 2-form entry primary school, land safeguarded for potential 6th form college provision. Therefore, it is considered that the development would have a positive effect on primary education.</p>
<p>11. Economy (ref: SA11)</p> <p>Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintain and enhance town centres.</p>	<ul style="list-style-type: none"> Will it promote Greater Norwich as a regional economic centre? Will it promote employment land provision to support existing and future growth sectors? Will it promote a range of employment opportunities? Will it promote vibrant town centres? Will it promote the rural economy? 	++	<p>A Population and Human Health ES chapter has been prepared and will be submitted with the planning application. The assessment concluded that construction of the development is likely to produce employment for an average of 117 FTE workers per month, over a 96-month period, providing a temporary beneficial effect on employment. In terms of its operational phase, a permanent beneficial effect on employment is identified as a result of the between 48 and 60 net additional jobs created by the development's provision of retail, community and health facilities floorspace. A cumulative assessment of the development alongside other schemes for which a planning application has been submitted, has identified beneficial effects on local expenditure and employment.</p> <p>The design of the development will include improved connections to Elm Farm Business Park which is located adjacent to the eastern extent of the site and to Wymondham town centre to the south west of the site. This will encourage the growth of existing businesses here and will provide benefits in terms of custom from new residents, which will help to increase the vibrancy of Wymondham town centre. The continued growth of North East Wymondham due to its strategic location along the Cambridge Norwich Growth Corridor, as set out within the SHMA Core Area and the NPA identified within the JCS, will help to promote Greater Norwich as a regional economic centre.</p>
<p>12. Transport and Access to Services (ref: SA12)</p>	<ul style="list-style-type: none"> Does it reduce the need to travel? Does it promote sustainable transport use? 	+	<p>The site is in close proximity of local facilities and public transport within Wymondham and Hetherset, reducing the need for car travel, including:</p> <ul style="list-style-type: none"> Education facilities, healthcare, supermarkets, retail, restaurants, recreation and leisure facilities;

SA Objective	Decision making criteria for site allocations and general polices	Score	Comments
<p>Reduce the need to travel and promote the use of sustainable transport modes.</p>	<ul style="list-style-type: none"> Does it promote access to local services? Does it promote road safety? Does it promote strategic access to and within the area? 		<ul style="list-style-type: none"> Wymondham Rail Station is located approximately 2.8km to the south west of the site, with regular direct services to Norwich, Thetford, Cambridge and Ely. The station is served directly by bus route 14/14A, or can be reached on foot from Wymondham town centre within an average walking time of less than 10 minutes; and Bus services, with the nearest bus stops currently provided on Norwich Common (B1172), approximately 750m to the south east of the site, with services running to Norwich approximately every hour. Services also run from Tuttlles Lane East to the south of the site to Wymondham town centre approximately every 20 minutes. <p>There are established pedestrian and cycle links between the development and existing facilities in Wymondham. The development includes for new facilities comprising a local centre, land safeguarded for a 2-form entry primary school, land safeguarded for potential 6th form college provision, open space and will include pedestrian and cycling access and will encourage sustainable travel to and within the site.</p> <p>A Transport and Access ES chapter, informed by a Transport Assessment, has been prepared for the development and will be submitted with the planning application.</p> <p>The following mitigation will ensure there are no significant impacts on the highways network:</p> <ul style="list-style-type: none"> Construction Method Statements (CMS) - prior to any construction activity on the site, a detailed CMS will be drawn up and agreed with the contractor and the Council to set out the appropriate site management practices to be adhered to; CEMP – standard best practice measure to manage impacts from construction traffic and ensure safety; and Travel Plan – will include measures to promote strategic access, reduce traffic generation and enable future residents, businesses and those using the development to access destinations beyond the site to travel using more sustainable transport modes. <p>It expected that within mitigation in place, there will be no adverse impacts relating to public transport, cycle and pedestrian connectivity and highway safety.</p>
<p>13. Historic Environment (ref: SA13)</p> <p>Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment.</p>	<ul style="list-style-type: none"> Does it enable the protection and enhancement of heritage assets, including their setting? Does it provide opportunities to reveal and conserve archaeological assets? Could it benefit heritage assets currently 'at risk'? 	0	<p>A Cultural Heritage ES chapter has been prepared for the site, supported by a Desk Based Assessment and a geophysical survey report. These reports will be submitted within the ES in support of the planning application.</p> <p>No designated heritage assets, (Scheduled Monuments, World Heritage Sites, Historic Battlefield Sites or Historic Wreck Sites) lie within or within the immediate vicinity of the site.</p> <p>The Moot Hill Scheduled Monument (Historic England ref.1003993) lies c.1.33km south of the site at its closest point and is separated from the site by intervening development. There is no visual, historical or functional association between the Scheduled Monument and the site.</p> <p>Wymondham Abbey Scheduled Monument (Historic England ref. 1003992) and Grade I Listed Building 'Abbey Church of St Mary And St Thomas Of Canterbury' is located c.1.4km south west of the site at its closest point. The development would not result in adverse effects on the Abbey (or its setting) due to the distance between the site and the Abbey and the separation caused by extensive intervening development.</p> <p>The desk-based assessment identified five built heritage receptors with the potential to be impacted by the development:</p> <ul style="list-style-type: none"> Oakland Farmhouse (Grade II, NHLE ref. 1291979) is located c.100m north of the site; Manor Farmhouse (Grade II, NHLE ref. 1291979) is located c.650m north west of the site; A limestone milestone (Grade II, NHLE ref. 1169504) is located to the immediate south of the site; Wong Farmhouse (Grade II, NHLE ref. 1050772) is located c.645m north of the site at its closest point; and The Park Farm Hotel (Grade II, NHLE ref. 1169658) is located c.550m south east of the site. <p>Ketts Oak Tree is located within the site. The development will retain this tree and seeks to enhance its setting through the provision of a new Country Park around it.</p> <p>The Wymondham Conservation Area is separated from the site by extensive intervening development.</p> <p>Following the implementation of a CEMP in the construction phase, and landscaping strategy based on the principles of the concept masterplan for open space areas in the operational phase, the alteration of the setting of the built heritage receptors is not likely to adversely impact on their importance. Due to limited views and intervening built form between the site and the heritage assets, it is considered there will be no significant impacts on heritage assets as a result of the development.</p> <p>No features of likely archaeological interest have been identified within the site. The ES chapter concludes that following an agreed program of archaeological trenching prior to the construction phase, no adverse effects on archaeological receptors are identified as arising from the development.</p>
		0	

SA Objective	Decision making criteria for site allocations and general polices	Score	Comments
<p>14. Natural Resources, Waste and Contaminated Land (ref: SA14)</p> <p>Minimise waste generation, promote recycling and avoid the sterilisation of mineral resources. Remediate contaminated land and minimise the use of the best and most versatile agricultural land.</p>	<ul style="list-style-type: none"> • Does it contribute to the minimisation of waste production and to recycling? • Does it safeguard existing and planned mineral and waste operations? • Will it help to remediate contaminated land? • Does it avoid loss of the best and most versatile agricultural land (grades 1-3a)? • Will there be adequate provision for waste and recycling facilities? 		<p>The development is not anticipated to produce waste to the extent that the creation or disposal of which would give rise to significant adverse effects. No demolition is required. The CEMP would detail the mitigation measures to be implemented during the construction phase to minimise waste and ensure that it is stored, managed, collected, reused, recycled and disposed of appropriately. Operational waste would be disposed of in line with the Council's requirements and managed in accordance with all applicable legislation. The design of the development will include appropriate areas for refuse and recycling points.</p> <p>Part of the south of the site is located within Source Protection Zone 3. The site is primarily agricultural land, and therefore is not likely to be heavily contaminated. The operational development will be for residential development and is not associated with hazardous substances or toxic emissions to water or air. Any such materials would be stored and handled in accordance with relevant legislation.</p> <p>The Site is undifferentiated Grade 3 agricultural land. There would be no loss of the best quality, Grade 1 or 2 land as a result of the proposed development, therefore likely significant effects are not anticipated.</p>
<p>15. Water (ref: SA15)</p> <p>Maintain and enhance water quality and ensure the most efficient use of water.</p>	<ul style="list-style-type: none"> • Will it maximise water efficiency? • Will it minimise impact on water quality? • Will it impact on water discharges that affect designated sites? • Will it contribute to achieving the River Basin Management Plan actions and objectives? 	0	<p>A Water Resources and Flood Risk ES chapter, supported by an FRA and Drainage Strategy have been prepared for the site and will be submitted with the planning application.</p> <p>The assessment identified the following:</p> <ul style="list-style-type: none"> • The Site is located fully within Flood Zone 1 (the low risk zone). However, the EA's surface water flood map shows surface water flood outlines for the majority of internal ditches / field drains within the site; • There are six groundwater abstraction boreholes within a 500m radius of the site. These are all for potable use associated with isolated farmhouses. There are no other surface water abstraction points marked on the records reviewed in the immediate vicinity of the site; • A number of internal ditches / field drains are located within the site, draining the western parcel (flowing in a north-westerly direction towards the River Tiffey) and the eastern parcel (flowing in a north-easterly direction towards the River Yare). A number of these ditches within the western parcel of the Site also convey flows through the site from land to the east; and • The site is underlain by superficial deposits which are classified as unproductive strata whilst the underlying chalk bedrock is classified as a Principal Aquifer, which is capable of supplying water at a strategic scale. <p>Proposed measures included to mitigate the effects generated by the construction phase include the implementation of a suitably worded CEMP and the incorporation of suitably designed SuDS. Proposed measures to mitigate the effects generated by the operational phase of the development include the implementation of an appropriate drainage strategy and allowing for the appropriate provision of management and maintenance for all drainage infrastructure by individual property owners, site management and Anglian Water as appropriate.</p> <p>Following implementation, the mitigation measures outlined above will ensure that there are no significant adverse effects on the water environment during the construction and operational phases of the development.</p> <p>The site is primarily agricultural land, and therefore is not likely to be heavily contaminated. The operational development will be for residential development and is not associated with hazardous substances or toxic emissions to water. Any such materials would be stored and handled in accordance with relevant legislation, therefore minimising the potential for impacts on water quality.</p> <p>The Biodiversity chapter of the ES concludes that there would be no likely significant effects on designated sites as a result of water discharge from the site.</p>

APPENDIX 5

DRAFT GNLP STATEMENT OF COMMON GROUND

Greater Norwich Local Plan (GNLP) Site Allocation Statement of
Common Ground (SoCG)

Between

Broadland District Council, South Norfolk Council,
Norwich City Council, Norfolk County Council

And

United Business and Leisure Ltd. and Landstock Estates Ltd

Site Reference:

Site Address:

Proposed Development:

- (1) Up to 650 residential dwellings, a local centre, land safeguarded for a 2-form entry primary school, provision of children's play space, and associated open space, sustainable urban drainage systems, landscaping, infrastructure and earthworks on land east and west of Wymondham Rugby Football Club; and
- (2) Provision of a new Country Park, including associated landscaping, infrastructure, sustainable urban drainage systems and earthworks, with land safeguarded for potential 6th form college provision, on land to the northeast of Elm Farm Business Park.

Introduction

The Greater Norwich authorities want to ensure sites allocated in the GNLP are achievable, where possible wholly compliant with all relevant planning considerations, and deliverable in a timely way. It is with that purpose in mind that landowners, agents and developers with a site likely to be included in the GNLP are being asked to agree a Site Allocation Statement of Common Ground (SoCG). Each SoCG will be available to the inspector appointed to examine the GNLP so that they can satisfy themselves of the commitment to deliver each site and to meeting local plan requirements.

The GNLP Team wants the process of agreeing a SoCG to be a frank but collaborative process for all parties concerned. In the case of most sites, this process is likely to commence in Autumn 2020 and conclude in 2021 as the Regulation 19 submission draft of the GNLP is finalised. For other sites, for example where development may entail abnormal costs, discussions may continue in to 2022, as the GNLP reaches its examination in public.

This SoCG template has been designed with consideration to the possibility of future planning reforms. It is deliberately straightforward and only asks the questions that any landowner, agent, or developer would naturally ask themselves. The template only requires 700 words of written response to complete, but its importance should not be underestimated.

The GNLP Team regards the viability and timely delivery of development as a high priority. Therefore, the working assumption is without a SoCG a site is unlikely to be allocated.

General Guidance

When completing the SoCG template please be precise. For example, in the description of development proposed, use the appropriate GNLP four-digit reference code, as well as giving a site address (including a postcode or eastings/northings reference).

Signatories to the SoCG should include all relevant parties with a role in bringing forward the proposed development. This should include all landowners, agents, developers, and possibly end-users of the development (if known).

Greater Norwich Local Plan (GNLP)

The SoCG template contains a series of free-text questions that are designed to be answered within 100 words. If for whatever reason answering one or more of these questions is not possible or proves difficult site promoters are welcome to seek guidance from the GNLP Team. This may lead to completing the SoCG with a description of what issues remain for resolution at a future date.

Completing this SoCG template should be done with reference to the draft policies associated to the GNLP. Notable examples that will likely affect the form of development on site and its construction costs include:

- Provision of green infrastructure and suitable alternative green space (known as SANGS) under Policy 2 Sustainable Development and Policy 3 Environmental Protection and Enhancement; and,
- Obligations for affordable housing under Policy 5 Homes.

It should also be noted that completing a SoCG is a separate exercise from other data requests made by the Greater Norwich Local Plan Team, or the Greater Norwich authorities. For example, this is a separate exercise to the Five-year Housing Land Supply statements that are requested for the Annual Monitoring Report.

Commercially Sensitive or Other Confidential Information

By submitting a SoCG you are consenting to the details about you and your site/s being published and available for public viewing. Any information that you consider to be confidential or commercially sensitive and would not want published should be excluded from this form.

By signing you are agreeing to the information provided being to the best available knowledge accurate, and that it can be used in preparation of the Greater Norwich Local Plan (GNLP) – and used in evidence at the public examination of the GNLP.

1. Please provide a commentary on the site's progress in respect to the three tests of being available, suitable, and deliverable.

[Approximately 100 words recommended]

2. Please provide a commentary on any land ownership constraints that may affect or delay development of the site.

[Approximately 100 words recommended]

3. Please provide a commentary on progress to making a planning application – such as pre-application advice, or if planning permission exists on all or part of the site.

[Approximately 100 words recommended]

4. Please provide a commentary on the site's delivery, for example a predicted start-on-site, the annual rate of delivery, and the development's likely completion date.

[Approximately 100 words recommended]

5. Please provide a commentary on engagement held with statutory bodies and if any agreements have been made.

[Approximately 100 words recommended]

6. Please provide a commentary on any known technical constraints about the site – such as but not limited to highways, heritage, or ecology.

[Approximately 100 words recommended]

The forthcoming Outline application for the Site will be accompanied by an Environment Statement as well as stand-alone statements and technical reports. This includes a thorough review of technical and environmental matters relating to the proposed uses for the Site. The conclusions of the Environmental Statement are that there would be limited harm as a result of the proposed development.

In respect of Landscape impact, visibility of the site from surrounding areas is relatively limited due to the presence of existing vegetation and the relatively flat topography. Views would be restricted to a limited number of receptors in close proximity to the Site, with longer range views heavily curtailed.

In respect of highways, there are good pedestrian, cycle and public transport links between the Site and existing services and facilities in Wymondham. The majority of key facilities within Wymondham can be reached by either walking or cycling from the Site. The application site includes a Local Centre to provide for the immediate convenience needs of the new population arising from the development and will also be accessible on foot from the wider residential developments in North East Wymondham including the under construction Elm Farm, shortly to commence Former Wymondham Rugby Club site and the all but completed Becket's Grove developments. In addition, a review of local highway safety found the proposed uses are unlikely to give rise to any significant safety issues on the local highway network.

In respect of flood risk and drainage, the Site is located within Flood Zone 1 and in the main at 'very low' risk of surface water flooding. The proposed uses on the Site incorporate the use of SUDS to ensure surface water drainage is managed on Site prior to discharge into existing boundary ditches.

In respect of ecology, detailed survey work has confirmed the Site is dominated by arable habitat not considered to be of ecological importance. Whilst habitats within the Site have potential to support a number of protected species including bats, breeding birds and invertebrates impacts upon these can be adequately addressed through mitigation secured through the development. Overall, the uses on the site would result in an overall gain in existing ecological interest supported by the site.

In respect of heritage considerations, the Site is not in the vicinity of any designated heritage assets or a Conservation Area. Geophysical surveys of the Site undertaken in 2010 and 2019 confirmed no features of likely archaeological interest on the Site.

7. Please provide a commentary on community benefits the site will offer – such as but not limited to land and/or buildings for education and community provision.

[Approximately 100 words recommended]

The forthcoming Outline application seeks planning permission all matters reserved (aside from access) for:

(1) Up to 650 residential dwellings, a local centre, land safeguarded for a 2-form entry primary school, provision of children’s play space, and associated open space, sustainable urban drainage systems, landscaping, infrastructure and earthworks on land east and west of Wymondham Rugby Football Club; and (2) Provision of a new Country Park, including associated landscaping, infrastructure, sustainable urban drainage systems and earthworks, with land safeguarded for potential 6th form college provision, on land to the northeast of Elm Farm Business Park.

The Site is therefore identified to deliver a number of benefits including:

The provision of up to 650 dwellings, comprising a mix of 1-bedroom to 5-bedroom dwellings;

The provision of up to 225 affordable dwellings (comprising policy compliant 33% provision plus 10 additional affordable dwellings);

The provision of a Local Centre with 1,950sqm of commercial and/or community floorspace;

Safeguarding of land within the Site for a new 2-form entry primary school;

Safeguarding of land within the Site for a new Sixth Form building, allowing the relation of Wymondham High’s existing facility and supporting the expansion of secondary education capacity;

The creation of a Kett’s Oak Common country park, providing a significant new area for natural and rural recreation, increasing access to the countryside and improving the setting of Kett’s Oak tree; and

Access to the adjoining and extensive Wymondham Rugby Club facility offering both leisure and sporting opportunities within walking distance of the development proposals.

Greater Norwich Local Plan (GNLP)

Signed on Behalf of the Greater Norwich Development Partnership	Date
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Signed on behalf of United Business and Leisure Ltd and Landstock Estates Ltd	Date
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NORWICH
City Council



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TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
INFRASTRUCTURE &
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DEVELOPMENT ECONOMICS