

By email only to: GNLP@norfolk.gov.uk

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

22nd September 2026

Dear Planning Policy Team,

RE: Greater Norwich Local Plan Scoping Consultation

Gladman Developments Ltd (Gladman) welcomes the opportunity to respond to the Scoping consultation for the Greater Norwich Local Plan 2045. Gladman has several land interests within the plan area that have been submitted to the Greater Norwich Development Partnership (the GNDP) for consideration for residential development through previous Call for Sites exercises. These include:

- Land south of Norwich Common, Wymondham (Site ID: 25709 and application reference 2026/1259)
- Land off Sutton Lane, Wymondham (Site ID: 25689)
- Land off Park Lane, Wymondham (Site ID: 25686)
- Land off Burston Road, Diss (Site ID: 25631)
- Land at Redenhall Road, Harleston (Site ID: 25684)

Gladman is keen to engage further with the GNDP regarding these land interests as the plan-making process progresses.

As advised by government, this consultation stage must provide the local community and other key stakeholders with the opportunity to have their say at the start of the plan-making process. The partnership must ask for views on:

- what to include in the local plan,
- how to approach future local plan engagement, and
- any other matters that you want to consult on.

The GNDP must run their scoping consultation after they have given notice of their intention to commence plan-making. The consultation should last for at least 21 days and must finish

prior to the publication of the Gateway 1 self-assessment summary. Feedback from the scoping consultation should be used to inform the community engagement strategy.

The scoping consultation must invite representations from the:

- general consultation bodies considered appropriate, and
- specific consultation bodies that the partnership consider may have an interest in the preparation of the local plan.

The authority has carried out the above criteria, with the Scoping Consultation running from the 17th August until 28th September 2026. It is noted that the GNDP ran a Call for Sites in February-March and June – July earlier this year, with Gateway 1 proceedings commencing on 30th October 2026.

The sections that follow set out the key topics that Gladman consider should be addressed through the new Local Plan.

Meeting Housing Needs

Gladman agrees that the Partnership must plan for high quality and well-designed homes in the Local Plan. The NPPF is clear that the standard method should be used as the starting point in establishing the housing requirement for an area. Gladman notes that the most up-to-date local housing need figure for the authority, defined using the standard method, is 2,590 dwellings per annum. The planning practice guidance (PPG) sets out that there are some specific circumstances in which an alternative approach to the standard method could be justified. Gladman submits that in this case, an alternative approach to the standard method is not justified. As such, there is no reason for the GNDP not to plan for its housing need defined by the standard method.

The most appropriate place for new housing is on the edge of existing towns as they are the most sustainable settlements with the most services, facilities and infrastructure available. Given the housing shortages (both nationally and locally), the creation of new towns and/or villages should also be considered by the partnership in appropriate locations. Likewise, there should be focus on extending existing villages to ensure that organic growth is provided to allow settlements to remain robust and sustainable in the longer term.

In light of this, a settlement hierarchy is an essential implement to ensure that sustainable growth takes place across the plan area. It is not a device to constrain development, rather, it must be utilised to identify (and in many cases, allocate) development in suitable locales. A robust settlement hierarchy allows for growth across all appropriate settlements and does not have an over-reliance on only the larger schemes. An effective settlement hierarchy also directs appropriate levels of development to the smaller settlements such as villages and smaller towns to ensure that there is sustainable growth for these locations.

Likewise, the appropriate types of housing are also important in planning for the longer term. Higher density developments, which are encouraged under the NPPF (2026) in areas near railway stations, are supported by Gladman provided that they are in suitable locations and of high-quality design.

To ensure that the emerging Local Plan is found sound by the Planning Inspectorate, the Partnership must ensure that not only high quality and well-designed homes are planned for, but also that an appropriate and realistic number of houses will be delivered in the plan period. Additionally, such dwellings must also be organically grown throughout the plan period, i.e. not all in the first few years (creating potential infrastructure impacts with high growth and fast delivery) or in the final few years with over-reliance on larger schemes coming forward. The latter of these instances often leads to plans failing to deliver their housing requirement, and as a result a failure to provide for the housing need.

Larger schemes are vital in plan-making, particularly during a period of a housing crisis where high numbers and large-scale are not only desired, but essential. As outlined by government, the target of 1.5 million homes by the end of this parliament is fundamental, with larger schemes playing an important role. However, backloading the delivery of large portions of dwellings in a local plan often means that many completions do not take place until after the plan period is over.

To avoid this, authorities must strike a balance between short-medium term sites and longer-term larger sites, including any large Strategic Sites, SUEs and/or new settlements. Short-medium term sites not only assist with delivery in the first few years of a local plan, but also contribute to the industry in terms of having sites available for small-medium sized developers. Local plans with an over-reliance on the larger sites can have a detrimental effect on such developers, as they do not have the resources for the larger sites. This can link with the settlement hierarchy, where the smaller settlements can provide significant contributions to meeting housing need across the plan period by having small-medium sites allocated across the authority.

If the Partnership propose to carry forward any allocations that have not come forward for development as yet, Gladman submits that robust evidence must be provided to demonstrate their deliverability.

Plan Period

Paragraph PM2 1(b) of the NPPF confirms that the minimum end date of a local plan should be 10 years from adoption. The Scoping Consultation confirms that the plan period will run until 2045. This would therefore mean that the plan, assuming that it is adopted in 2029 as per the Local Plan Timetable, would cover 16 years.

Our experience of local plan examinations suggests that delays to the local plan-making process are inevitable. Even when considering the new fixed plan-making timescales, delays at examination stage will likely still occur. As such, should the Partnership choose to reduce the plan period in response to the revised NPPF, Gladman recommends that a plan period of at least 13 years is pursued. This would ensure that the minimum 10-year period is achieved, taking into account the compulsory 30-month plan making period, the potential for a six-month extension to the examination process permitted under the legislation and any other delays that may arise.

Policy PM2(1)(b) of the NPPF explains that “local plans can cover a longer time period where this would, for example, help support the delivery of longer-term infrastructure or strategic development”. The Partnership should consider whether the plan period needs to be extended in order to facilitate the delivery of longer-term strategic sites.

Brownfield Land

Gladman submits that there should not be an over-reliance on brownfield development and that the capacity of brownfield sites should not be overestimated. Although Gladman recognises the important role brownfield development plays in delivering much-needed housing, it must be noted that the viability of brownfield sites is more challenging, due to issues such as remediation costs, and can result in less affordable housing provision. Furthermore, brownfield sites are often more suited to being developed into high-density flatted development with typically one or two bedrooms per apartment. Therefore, Gladman stresses that an appropriate balance should be struck between brownfield and greenfield development so that the varied housing needs in the borough can be met in full.

Design

The National Design Guide, the National Model Design Code and the NPPF set out the key principles and characteristics for creating beautiful, high-quality and sustainable places. Gladman endorses this approach to creating healthy, safe, green, environmentally responsive, sustainable, distinctive and beautiful places and actively encourages a joined-up and coordinated approach between key disciplines, particularly landscape, ecology, drainage and masterplanning, in close liaison with key stakeholders. A range of disciplines across different sectors should be involved at an early stage to generate ideas, interventions and solutions to help shape future development.

Climate Change

It is acknowledged that the planning system has an important role to play in tackling the effects of climate change. In this respect, the overarching environmental objective of sustainable development cited in Section 1: paragraph 17c of the National Planning Policy Framework highlights how the planning system should help to mitigate and adapt to climate change and support the transition to a low carbon economy.

This objective filters through to other elements of the Framework, including Section 5 that deals specifically with Meeting the Challenge of Climate Change. In this regard, this section of the Framework identifies how the planning system should:

“support the transition to net zero by 2050 and to shape places in ways which are more resilient to the effects of climate change. It does this by setting out policies to shape places in ways that contribute to radical reductions in greenhouse gas emissions and adapt to the full range of current and potential impacts of climate change, by minimising vulnerability and improving resilience.”

Gladman therefore recognise the increasing importance of tackling climate change and encourage sustainable housing developments to mitigate its impact. The Partnership should

continue to take account of climate change in its plan-making, including any updates to guidance in relation to the Framework and PPG. It is important to recognise that mitigating and adapting to climate change must also be compatible with other important objectives for the planning system, including the requirement to boost housing delivery and build a strong, competitive economy.

Norwich City Council and Broadland District Council have both declared climate emergencies whilst South Norfolk District Council have pledged to achieve net-zero carbon emissions for its own operations and delivery by 2030. Gladman takes climate change seriously and our various land interests can deliver numerous environmental commitments to assist the Partnership in meeting their climate related strategies.

Provision of Public Open Space

Well-designed open space will support an active lifestyle, by encouraging people to walk and cycle. It can also assist in terms of climate change resilience, through the provision of tree planting providing shading and CO2 absorption.

Sustainable Transport Methods & Active Travel

Residential schemes should deliver a comprehensive package of pedestrian and cycle infrastructure that promotes sustainable travel choices and reduces dependence on private vehicles. This should include safe, direct and attractive walking and cycling routes that are well connected to facilities and services. Residential schemes can promote healthier lifestyles and contribute to wider environmental and sustainability objectives.

Renewable Energy & Energy Performance

Developments should be designed to meet energy performance and efficiency targets through a fabric-first approach to construction, with the aim of reducing energy demand and associated carbon dioxide emissions. Renewable energy technologies will be considered at the detailed design stage to support the transition to a low-carbon future.

Natural and Historic Environment

The conservation and protection of the natural and historic environments are key aims of the NPPF, as set out within Sections 19 and 20. Plans should outline positive strategies for conservation and enjoyment.

A proportionate approach should be utilised to ensure that suitable protective measures are actioned and policies do not exaggerate the importance of assets to the detriment of other aspects of the Local Plan, for example restricting otherwise sustainable development sites.

Economic Development

Gladman support the economic growth aspirations of the authority. Housing development has a key role to play in fostering growth and providing job growth and investment through both the direct and indirect effects of development.

General Comments

The emerging Local Plan should not repeat or conflict with national policy. Policy PM6(1)(c) of the NPPF states that plans should “not include policies which duplicate, substantively restate or are inconsistent with the content of national decision-making policies, unless directed by other policies in this Framework”. In addition, Policy PM13(1)(b) of the NPPF explains that quantitative standards set through development plan policies should not cover matters that are already addressed by the Building Regulations, except in relation to accessibility standards, water efficiency and energy efficiency. The policy outlines that where standards are proposed beyond the requirements of the Building Regulations for water efficiency and energy efficiency, these should be justified and robustly evidenced.

Policy N1(2) of the NPPF states:

“Development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations, and is fully justified and deliverable. Local standards should not extend to categories of development which are exempt from statutory biodiversity net gain.”

Throughout its preparation, the emerging Local Plan should be kept under constant review to ensure that it remains consistent with any changes to national planning policy and guidance.

Conclusion

Gladman look forward to further engagement with the Partnership on this emerging Local Plan, and will continue to engage in future consultations during the plan-making process.

Gladman

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Gladman Developments Ltd.