

Loddon Town Council Clerk

From: Loddon Town Council Clerk
Sent: 02 September 2026 16:41
To: Loddon Town Council Clerk
Subject: Greater Norwich Local Plan 2045 - Regulation 20 Scoping Consultation – Proposed Response from Loddon Town Council

Greater Norwich Local Plan 2045

Regulation 20 Scoping Consultation – Proposed Response from Loddon Town Council

Introduction

Loddon Town Council welcomes the opportunity to comment on the Greater Norwich Local Plan 2045 Scoping Consultation.

The Council recognises the need to plan positively for housing, employment and sustainable communities. However, it considers it essential that future development is genuinely infrastructure-led and that the cumulative impact of previous, committed and proposed development on settlements such as Loddon is properly understood before further significant growth is allocated. Loddon is a Key Service Centre serving not only its own residents but a substantial surrounding rural area. Its shops, schools, healthcare, community facilities, employment opportunities and transport network therefore perform a wider role than population figures for Loddon alone may suggest. The Town Council considers that this wider function, together with existing infrastructure constraints, should be central to decisions about the amount and location of future growth.

Question 1 – Are there any other key Strengths, Weaknesses, Opportunities or Threats that should be included in the SWOT analysis for Greater Norwich?

Loddon Town Council response:

The Council considers that greater recognition should be given to the infrastructure pressures experienced by rural service centres which support a much wider catchment area.

A settlement may appear to have a good range of services and facilities and therefore be considered a sustainable location for additional development. However, the existence of a facility does not necessarily mean that it has sufficient capacity to accommodate substantial additional growth.

The SWOT analysis should therefore recognise:

- pressure on highways and transport infrastructure within established settlements;
- capacity of healthcare, education and other community services;
- wastewater, drainage and water-supply constraints;
- the cumulative impact of successive developments;
- limited public transport choices in rural areas and the resulting reliance on private vehicles; and
- the potential loss of landscape character and settlement identity through continued peripheral expansion.

Infrastructure constraints should not simply be viewed as matters which can be addressed following the allocation of development. They should inform the amount and location of growth from the outset.

Question 2 – Is there any other baseline data that should be considered?

Loddon Town Council response:

The Council considers that settlement-level infrastructure capacity data should form an important part of the evidence base.

For Loddon this should include, as a minimum:

- highway capacity and traffic movements, including the A146 and routes through the town centre;
- cumulative traffic impacts arising from existing, committed and potential development;
- public transport frequency, capacity and accessibility;
- school capacity;
- GP, dental and other healthcare capacity;
- wastewater treatment and sewer network capacity;
- surface-water drainage and flood risk;
- availability and capacity of sports, recreation and community facilities;
- pedestrian and cycling connectivity; and
- the availability and quality of green infrastructure and public open space.

The Council particularly considers that assessments should distinguish between the **presence** of a service and its actual **capacity** to accommodate further population growth.

Question 4 – Which elements of the existing growth strategy and settlement hierarchy have and have not worked well?

Loddon Town Council response:

The Council recognises the principle of directing development towards settlements with access to services, employment and public transport.

However, there is a risk that settlements classified as Key Service Centres experience repeated growth precisely because they contain services, without sufficient consideration being given to whether those services and the surrounding infrastructure have the capacity to accommodate continued expansion.

Loddon has experienced significant development and the cumulative impact of this growth needs to be properly assessed before determining an appropriate level of further development.

The Council therefore supports a more sophisticated approach which considers infrastructure capacity, connectivity and environmental constraints alongside the number of existing services within a settlement.

Question 6 – What areas do you consider appropriate for additional growth and what infrastructure, services and amenities would need to be prioritised?

Loddon Town Council response:

At this early stage, Loddon Town Council does not consider it appropriate to identify or support individual areas around Loddon for additional growth. The Council understands that individual Call for Sites submissions have not yet been assessed and will be considered through a later stage of the Local Plan process.

Before determining whether further significant growth should be directed towards Loddon, the Council considers that a comprehensive assessment of the town's infrastructure capacity is required.

Particular consideration should be given to:

- the A146 and its junctions;
- traffic movements through Loddon and the town centre;
- highway capacity and road safety;
- sustainable transport and bus provision;
- safe pedestrian and cycling connections;
- education capacity;

- GP, dental and healthcare provision;
- wastewater and drainage capacity;
- flood risk;
- sports, recreation and community facilities;
- green infrastructure and biodiversity; and
- the cumulative impact of existing and committed development.

Where development is proposed, the necessary infrastructure should be identified, funded and delivered at an appropriate stage, rather than development being permitted in anticipation that infrastructure improvements may follow at a later date.

Question 7 – Should changes be made to the settlement hierarchy?

Loddon Town Council response:

The Council supports reviewing the methodology used to establish the settlement hierarchy. Loddon's designation as a Key Service Centre reflects its range of services and facilities and its important role in serving the surrounding rural area. However, classification within the settlement hierarchy should not automatically imply capacity for significant additional growth.

The Council supports an approach which combines accessibility and connectivity with a detailed assessment of infrastructure and service capacity.

Any revised methodology should therefore consider:

1. the availability of services;
2. the capacity of those services;
3. sustainable transport accessibility;
4. highway constraints;
5. environmental constraints;
6. the amount of development already delivered or committed; and
7. the cumulative effect of additional development.

This would provide a more realistic assessment of the ability of individual settlements to accommodate further growth.

Question 15 – How can infrastructure delivery be well co-ordinated and funded to support growth?

Loddon Town Council response:

The Council strongly supports an **infrastructure-led rather than development-led** approach. Infrastructure requirements should be identified through the Local Plan evidence base before sites are allocated wherever possible.

Development should contribute appropriately towards the infrastructure required as a consequence of the additional population it generates, including highways, education, healthcare, community facilities, sports and recreation, public transport, walking and cycling infrastructure and green infrastructure.

The Council is concerned about situations where development is delivered significantly ahead of the infrastructure required to support it.

The Local Plan should therefore establish clear mechanisms for phasing development against infrastructure provision and should ensure that infrastructure commitments are deliverable and adequately funded.

The cumulative impact of multiple developments within the same settlement or catchment must also be considered when establishing infrastructure requirements.

Question 16 – Accessibility, wastewater capacity and net zero

Loddon Town Council response:

The Council supports measures which improve accessibility to employment, services, sports and community facilities through walking, cycling and public transport.

However, the realities of rural communities must be recognised. Residents of Loddon and the surrounding villages remain considerably more dependent on private vehicles than residents of Norwich, particularly for journeys which cannot readily be undertaken by public transport.

New development should therefore provide genuinely usable sustainable transport connections rather than relying solely on theoretical proximity to existing services.

Wastewater treatment and sewer network capacity should also be established before significant new development is allocated. Where infrastructure improvements are necessary, there should be confidence that they can be funded and delivered within the required timescale.

Question 17 – Water efficiency, nature recovery and green infrastructure**Loddon Town Council response:**

The Council supports strong standards for water efficiency, nature recovery, biodiversity and green infrastructure.

Green infrastructure should be considered essential infrastructure rather than residual land remaining after development.

New development should provide connected, accessible and appropriately managed green spaces which contribute to biodiversity, recreation, climate resilience and the health and wellbeing of residents.

Particular consideration should also be given to the cumulative loss of undeveloped land around settlements and the importance of maintaining ecological connectivity between habitats.

Question 18 – High-quality design, landscape, townscape and historic environment**Loddon Town Council response:**

The Council strongly supports policies requiring development to respond to local landscape, townscape and historic character.

Loddon has a distinctive historic centre and an important relationship with the surrounding rural landscape and the Broads.

Future development should therefore be designed in response to the specific character of Loddon rather than applying generic development layouts and designs.

The Local Plan should seek to protect important views, landscape setting, heritage assets, mature trees and hedgerows and ensure that new development creates attractive and distinctive places which integrate successfully with the existing settlement.

The Council would also support meaningful early engagement with town and parish councils regarding design and placemaking for significant developments.

Question 19 – Evidence required to prepare the GNLP 2045**Loddon Town Council response:**

The Council considers that robust settlement-level infrastructure assessments should form part of the evidence used to determine the distribution of growth.

For Key Service Centres such as Loddon, these assessments should consider infrastructure capacity alongside the cumulative impact of development already completed, under construction or committed through existing allocations and planning permissions.

The Council particularly supports evidence being gathered on:

- highway and junction capacity;
- traffic and transport movements;

- public transport accessibility;
- education capacity;
- healthcare capacity;
- wastewater and drainage infrastructure;
- flood risk;
- sports and recreation provision;
- community facilities; and
- green infrastructure.

This evidence should be available before decisions are made at the next stage regarding the preferred distribution of growth and potential site allocations.

Question 22 – Is there anything else you would like to comment on?

Loddon Town Council wishes to emphasise that it is **not opposed in principle to sustainable development**.

However, the Council considers that future growth must be proportionate to the ability of settlements to accommodate it and must be supported by appropriate infrastructure.

The designation of Loddon as a Key Service Centre should not, by itself, be taken as evidence that the town can accommodate substantial additional development.

Before determining the level of further growth appropriate for Loddon, the GNLP should assess:

what development the town has already accommodated; what development is already committed; what capacity remains within its infrastructure and services; and what additional infrastructure can realistically be delivered.

The Council considers that this evidence-led approach would provide the most appropriate basis for determining whether, where and to what extent further growth around Loddon should take place.

Loddon Town Council looks forward to engaging further with the GNLP process when potential growth options and individual sites are assessed at the next stage.

Best wishes
Emily

Emily Curtis
Town Clerk

Loddon Town Council

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