

Adam Banham
Broadland District Council
Planning Department
Thorpe Lodge, 1 Yarmouth Road,
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24 September 2026

Dear Mr Banham,

**GREATER NORWICH LOCAL PLAN 2045
SCOPING CONSULTATION RESPONSE ON BEHALF OF LATIMER DEVELOPMENTS**

Introduction

These representations are submitted on behalf of Latimer Developments, part of Clarion Housing Group. They respond to the current Greater Norwich Local Plan 2045 Scoping Consultation, the first engagement stage in the new Plan-making process as set out in the Town and Country Planning (Local Planning) (England) Regulations 2026.

Latimer is the dedicated development arm of the Clarion Housing Group. It was created to ensure that Clarion has an organisation capable of building homes of all tenures, for multiple communities and locations, realising the mission to play a part in tackling Britain's housing crisis. Latimer is committed to investing billions of pounds in new housing over the next decade, building at scale and creating vibrant new places to live. Surplus made by Latimer goes back into Clarion, giving the Group even more opportunities to build homes and create communities. As a major developer, Latimer delivers on average approximately 1,700 new homes each year, with approximately 83% of these being affordable tenures – underpinning its central role in expanding the UK's affordable housing supply.

Latimer has land interests across the Greater Norwich area at Land at Honingham Thorpe Farm and Land to the south-west of Acle. Both have been submitted through the Councils' Call for Sites process. We understand site assessment work is ongoing and will continue to work proactively with the Councils throughout this process where opportunities arise.

Clarion has wider interests across the area being the largest social housing provider in the region and has its regional headquarters at Broadland Business Park in Norwich. Clarion and Latimer are committed to increased affordable delivery across the Great Norwich area and believe the emerging Local Plan can play a key role in achieving this.

Whilst our response to this Scoping consultation is prepared in objective terms, the degree to which it aligns with Clarion's goals to deliver a significant number of good quality homes and affordable homes, create communities and achieve genuine quality of life improvements for residents might be noted; objectives which are shared with the Council. The response addresses the questions posed by the consultation, as well as comments on the emerging evidence base and provides a brief overview of the site opportunities at both Honingham Thorpe Farm and Acle.

Scoping Consultation

The current scoping consultation represents the first stage in engagement under the new Plan-making process. It is a relatively high-level document which explains the emerging requirements of the Plan and consults on potential content. As detailed in the consultation this does not consider specific sites at this stage. Our responses to questions are set out below, as well as comments on the Topic Papers in the following section.

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

We agree with the SWOT analysis presented by the Councils and consider this to be a fair overview of key considerations for the Plan going forward. Notably, the Councils should build on the success of the Greater Norwich Local Plan (GNLP) in a way which complements and does not conflict with the approach adopted there. This, in our view, will require bold strategic decisions which look beyond existing edge of settlement growth as reflected in these representations.

The Councils have a relatively unique opportunity (as reflected in the Opportunities) to maximise growth around areas which have had significant investment in road infrastructure including along the A47. This has notably improved the prospects of delivering well-connected development in locations which may have not been considered as favourable in preparation of the adopted GNLP.

Affordable housing and affordability (in general) should be recognised in the SWOT, with a key tenet of the Vision and objectives of the Plan being to deliver more affordable homes and improve quality of life. The Councils have their own programmes of affordable housing delivery which should be seen as a strength, alongside the opportunity to increase delivery through supporting development.

Question 3 - Do you agree with the proposed broad structure of the GNLP 2045 above?

Yes, we agree with the proposed structure which aligns with the new plan-making system and National Planning Policy Framework (NPPF). The most recent version of the framework includes Decision Making Policies, and there is no need for the Local Plan to replicate these. The Plan should focus on local considerations, including how growth needs will be met.

Question 5 (2) - What development types would you support as part of our updated Growth Strategy?

Broadly, we support the GNLP growth strategy which sought to meet housing needs (at that time) in a way which maximised brownfield development and regeneration opportunities but accepted this was unable to meet needs alone. The GNLP then distributed growth through the settlement hierarchy maximising opportunities in the most sustainable areas and/or those with access to jobs, services and infrastructure.

The GNLP represented a significant step-change in housing requirements / supply across the Greater Norwich area. To address this the Plan focused greenfield growth to the edge of existing settlements and along growth corridors. The majority of these sites are yet to come forward or at an early stage of delivery. The scoping consultation reflects this.

In reflection of this, and the ongoing status of many of those sites, it is unlikely the needs of the Greater Norwich Local Plan 2045 could be accommodated in the same way. Alternative options need to be considered, and a reasonable option for strategic-scale development / new settlements should be recognised.

We consider the final growth strategy will likely be a hybrid option of those opportunities identified in the scoping consultation including a mix of brownfield intensification (mostly existing GNLP allocations), existing urban extensions (which can be reviewed and increased where justified), new urban extensions in suitable locations (i.e. in locations close to stations or close to improved strategic road infrastructure) and standalone new settlement/s.

Question 6 - What areas do you consider to be appropriate for additional growth and what infrastructure, services and amenities would need to be prioritised to enable growth in these locations?

As set out in these representations, we consider the opportunities promoted by Latimer at Honingham Thorpe and South-west Acle are appropriate locations for growth. We will work with the Council to establish infrastructure requirements and ensure these are embedded in emerging proposals for the sites and phased accordingly.

Question 7 - Should any changes be made to the settlement hierarchy through the new local plan? Please explain your reasons.

Please note our comments in response to the Settlement Hierarchy Topic Paper.

Question 8 - What measures could the councils take to improve housing delivery rates through the local plan?

As recognised by the scoping consultation there are many factors outside of the Councils' control which affect housing delivery. Nevertheless there remain measures which the Council can control including:

- Ensuring the Local Plan remains up-to-date through preparation and adoption of a sound Local Plan;
- Avoiding unnecessary duplications of national Decision Making Policies;
- Providing clear advice on infrastructure expectations and requirements, including timings and costs;
- Ensuring site allocations remain flexible whilst capturing site specific and locational specific requirements; and
- Working with applications / promoters / landowners to bring forward development which aligns with the Council's policies and aspirations.

Question 10 (1) - What should the GNLP 2045 do to assist the delivery of affordable housing?

The scoping consultation recognises the challenge of affordable housing delivery. The wider evidence base, yet to be produced, should ascertain the full extent of affordable need and consider how best this be addressed in a manner which is aspirational but realistic. The Vision and Objectives of the Plan should set out the goal to increase affordable housing delivery and address affordability pressures.

Some of the success of the adopted GNLP in respect of affordable delivery has come down to the Councils' programme of affordable delivery. This should continue but needs to be supplemented by developer-led affordable delivery. Site selection will be key here, as will choice of delivery partner, and the Councils should ensure a robust approach to considering site-specific viability is embedded in its evidence base work.

Where possible, the Councils should be supporting the aspirations of developers to deliver affordable housing beyond minimum requirements, whether this be through Section 106 obligations or grant funding. In this respect, experience of delivering affordable housing-led developments should be acknowledged and reflected in the Councils' consideration of site opportunities.

Working collaboratively with affordable housing delivery partners will be key in ensuring the success of the emerging Plan in this respect.

Question 16 (1) - How should the GNLP 2045 support improved accessibility to housing, employment, services, sports and other community facilities?

The emerging Plan should reflect that development could deliver a range of benefits beyond just housing / employment. It can, subject to relevant locational, design, technical and viability considerations, achieve positive outcomes for access to services and facilities through enhanced connectivity, physical or monetary improvements to existing provision and/or new on-site provisions.

We consider the choice of strategy for meeting growth needs will be important for demonstrating improved accessibility for residents. This should ensure that development opportunities are community minded, such that they deliver genuine improvements beyond "just housing". In this respect, we consider there to be a clear opportunity for strategic-scale developments which deliver a range of uses in one location. These could have the benefit of not only delivering facilities and services to new residents but also enabling access for existing residents through well connected places.

Evidence Base Documents

Alongside the scoping consultation the Councils have published initial evidence base documents, comprising topic papers and fact sheets. These provide early high-level overviews of relevant matters including the environment, housing and infrastructure. These have been reviewed with our comments below.

Economy Topic Paper

We agree with the Councils' early policy direction of thoughts and consider these to be the right questions to be focused on at this time in the Plan-preparation.

The emerging Plan provides the opportunity to co-locate employment uses alongside new strategic growth opportunities, as well as locating new housing development in locations which maximise access to existing employment opportunities. These should be matters considered as the evidence base work and site selection work progresses.

Environment Topic Paper

We consider the Council has correctly identified the key themes / topics which need ongoing consideration and will influence the overall strategy for growth of the Plan and site selection. Notably, and in line with national policy and guidance, the Plan should look to direct growth to areas which are less constrained environmentally and technically. Areas of high sensitivity, including strategic gaps, should be avoided where practicable.

Whilst development will, inevitably, result in change, it does not always lead to negative outcomes. Sensitively designed development has the ability to deliver environmental benefits through climate adaption, managing flood risk, achieving quantified biodiversity enhancements and delivering landscape and green infrastructure improvements. The Councils' evidence base should reflect this and the Councils should continue to work with promoters to establish how these benefits can be achieved.

Housing Topic Paper

Whilst not yet set, it is positive to see the Councils are not seeking to challenge the standard method calculation for housing need. The housing requirement should adopt this as a minimum requirement and review whether a higher requirement is justified and/or achievable. As noted in the Paper this should include consideration of unmet need from neighbouring areas. It should also include whether an uplift is justified accounting for affordable housing needs, as per national guidance.

In respect of affordable housing, we agree that detail evidence base work should be completed to fully ascertain the extent of the need (which is substantial) across the Greater Norwich area and consider how best this be addressed through the emerging Plan.

As recognised in the Paper, recent successes relating to increasing affordable housing provision have been achieved through increased Council provision rather than through improved viability. The Councils should strive to continue this but look for ways to increase affordable delivery through private sector led development. Maintaining the longstanding relationship with Clarion, through supporting its development ambitions (Latimer), is undoubtedly one way to do so. Latimer's involvement in the Plan process should be recognised and we seek to continue to work proactively with the Councils where opportunities arise.

New settlements and strategic-scale opportunities should play a role in delivering housing needs across (and likely beyond) the emerging Plan period. Whilst these do take time and effort to realise, they ultimately can deliver broader benefits across a longer time period than other development. They will contribute to housing and affordable housing supply reliably and consistently once delivering. The Paper notes that developments of this scale may have prolonged planning processes and long build-out timescales. Latimer will work with the Councils to ensure expedient delivery of its sites, including securing detailed consents for first phase/s early in the Plan period.

Infrastructure Topic Paper

Infrastructure is clearly a key consideration for ensuring the right development is located in the right places (and at the right time). Whilst existing infrastructure provision should be maximised, where

capacity allows, development provides the opportunity to improve and/or provide new infrastructure where required.

Notably, development at scale has the potential to include co-located uses such as education, sports facilities, healthcare, community facilities and public open space, which would deliver meaningful benefits to communities.

We will work with the Council throughout the preparation of the Plan to ensure infrastructure needs are fully considered in any of Latimer's proposals, including consideration as to when these need to be phased alongside housing development, how they will be funded and who will manage them in the long-term.

New Settlements Topic Paper

In line with the adopted GNLP the Councils are actively considering new settlement opportunities. We actively support this and believe strategic-scale opportunities which are not overly dependent on existing settlements will be important in meeting growth needs of the Plan (and potentially beyond). The questions over where, what, how and who will need to carefully be considered through evidence base work which reviews available opportunities and assesses suitability, achievability and promoter aspirations and experience.

We agree with the evidence / strategy work set out in Table 3 and welcome working with the Council to robustly consider the propositions put forward over the coming 12 months. We do however consider it necessary that genuine thought be given to affordable housing delivery across opportunities, in order to properly understand how these could materially improve affordability across the Greater Norwich area. Affordability / affordable housing delivery is a critical issue which should be at the heart of the Plan and its chosen spatial strategy.

Settlement Hierarchy Topic Paper

Whilst the Councils have identified a desire to move away from the traditional settlement hierarchy approach we consider this still retains merit and needs to be a material consideration in how any hierarchy is set in the new Plan.

We agree the Connectivity Tool referenced should not be the sole basis for the new settlement hierarchy. Whilst helpful, for the reasons set out, this does not reflect recent improvements to road and other infrastructure, and ignores opportunities for increasing sustainability improvements through development.

A hybrid approach is likely necessary in order to reflect the existing provision of services and facilities, connectivity, and how settlements / locations may change over the course of the Plan period.

In this respect, new settlements will likely sit outside of the settlement hierarchy as their own category which evolves over the Plan period. Whilst being connected to existing locations, they will be supported by their own facilities and services. Future plan-making exercises can capture these within the hierarchy at that time.

Vision and Objectives Topic Paper

No comments, relevant outputs included in the Scoping Consultation (commented on above).

Site Opportunities

Land at Honingham Thorpe Farm

Land at Honingham Thorpe Farm is being promoted as a new settlement opportunity, as shown in **Appendix A**. It comprises agricultural land located to the west of Norwich and Easton and close to, but separate from, the villages of Honingham (to the north-west), Colton (to the west) and Marlingford (to the south-east). There are a variety of other existing uses near to the site including the adjacent Food Enterprise Zone and existing employment uses of Honingham Thorpe Farm (both within the same landownership) and nearby Easton College and Norfolk Showground.

The site forms a logical location for development which has the benefit of being well-screened from the majority of views from the surrounding area by virtue of external boundary planting (tree belts / woodland) strategically planted over the past decades. To the north of the site is the A47 from which one of the new junctions (following major engineering works) would directly connect to the site.

The site offers a unique opportunity for a new settlement in a highly accessible location. We remain committed to working collaboratively with the Council, nearby communities and other key stakeholders to deliver a new community which is shaped by the place in which it is located and people it will serve. This will include provision of new facilities to serve the site and wider community and linkages to the wider area, alongside public transport improvements maximising the proximity of the site to the A47, Easton, Norwich and wider region.

We consider the new settlement could viably deliver:

- Circa. 5,000 residential dwellings of a variety of scales and sizes, include areas of higher and lower density;
- At least a policy compliant (33%) provision of affordable housing, with potential for delivery of additional affordable housing reflecting Clarion involvement;
- Local / Village Centre/s including retail, community facilities and other uses;
- Education provision;
- Employment or improved links to existing employment nearby;
- Significant Green Infrastructure provision including potential or new Country Park;
- Sports facilities, formal and informal;
- Variety of play facilities throughout the development alongside NEAPs and areas for older children / teenagers; and
- Enhanced public transport provision, pedestrian and cycle links to nearby settlements including the employment and education opportunities.
- Opportunity to significantly enlarge and enhance the small pockets of ecology which do exist in the landscape.

Honingham Thorpe is an opportunity which should be pursued further and we are keen to work closely with the Council to help achieve this.

Land to the south-west of Acle

Acle is an existing sustainable settlement, defined as a Key Service Centre in the adopted settlement hierarchy. It is identified to have a good range of services, including secondary school provision and rail services.

Latimer controls land to the southwest of the village, which surrounds existing Clarion housing stock along Beighton Road. The majority of this is to the south of the A47, with the exception of a small area to the north. The area of land control is included in **Appendix B**. In addition to this, we consider there be a wider opportunity which makes the most of new highway infrastructure along the A47 towards Lingwood. This wider strategic opportunity is identified in **Appendix C**, with the land identified being available for development (under the control of Latimer, a willing 3rd party and the County Council).

These opportunities to the south-west of Acle provide the Council options for growth to be considered further as the Local Plan process progresses. As set out in the call for sites submission this could include (but not be limited to should the Council consider alternatives more suitable):

- Circa. 200 dwellings across Site 1 (as shown in Appendix B) alongside necessary supporting open space, pedestrian and cycle routes and supporting infrastructure;
- Circa. 1,200 – 1,400 dwellings across Site 1 and 3, including additional non-residential uses such as education provision, community uses, retail and employment; or
- A strategic opportunity across circa. 160 hectares of land (Appendix C) which has potential to deliver a significant quantum of residential development alongside wider co-located uses and community facilities including local centre/s. With new green pedestrian and cycle links between Acle and Lingwood.

All opportunities would include policy compliant affordable housing, with a high likelihood of an enhanced provision being achieved in line with Latimer / Clarion's aspirations.

The sites identified are generally unconstrained from environmental or policy perspective, including being predominately free of flood risk and there being limited / no built heritage constraints in the surrounding area. They are detached from the Broads and offer positive opportunities for landscape and ecological-led development in locations which benefit from significant new highway infrastructure.

Whilst the Acle opportunities may sit outside of the Council's 'new settlement' considerations, we are willing to work with the Council through the same process to demonstrate the suitability of the identified strategic opportunity.

Summary

Overall, we consider the scoping consultation a positive first step taken by the Councils in moving towards production of the Greater Norwich Local Plan 2045. We hope our comments are useful in refining the scope of the Plan and we look forward to continuing to work with the Council as you move forward through the Plan-making process and continue to assess the opportunities at Honingham Thorpe and Land South-west of Acle.

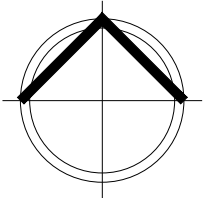
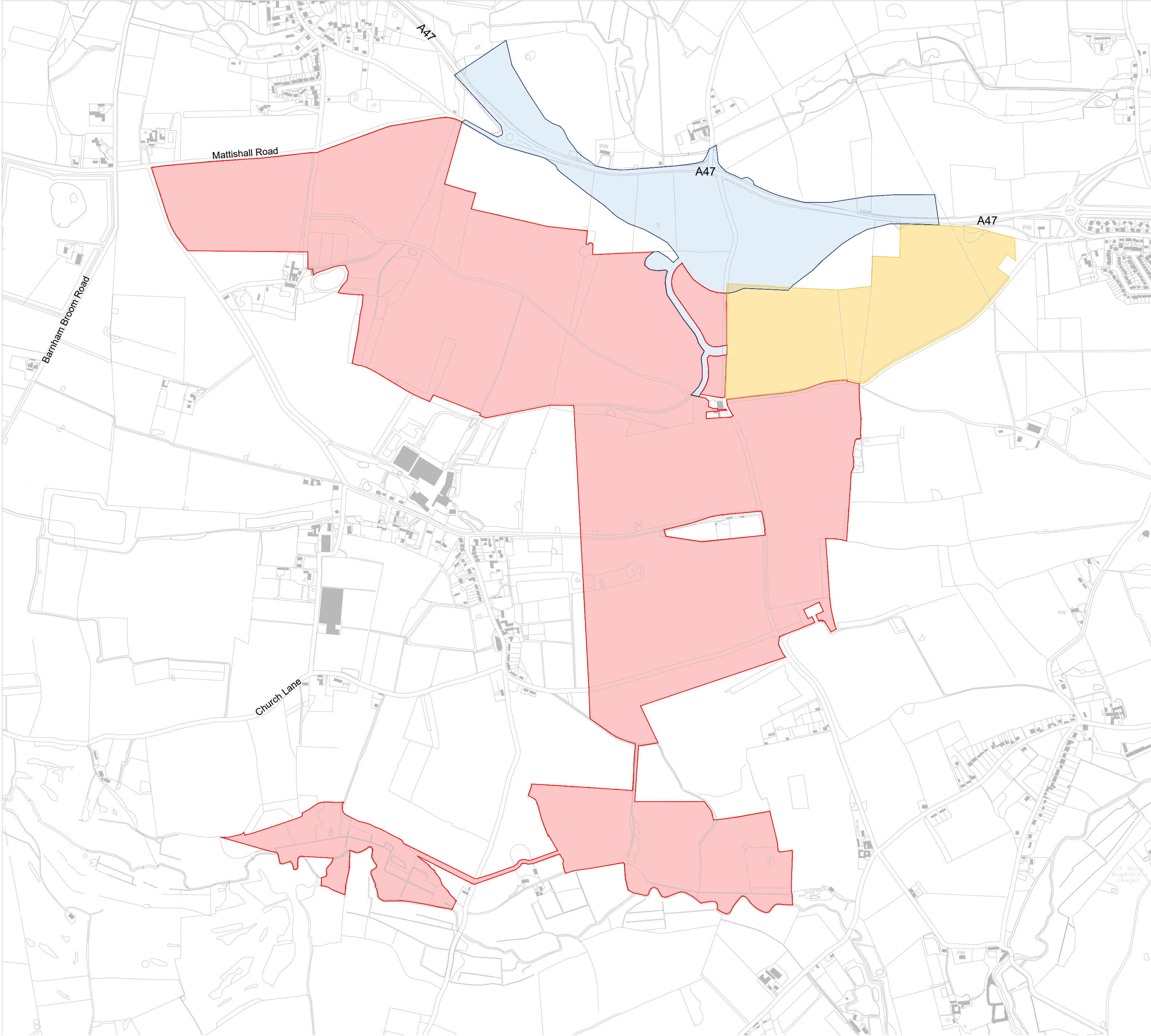
Yours faithfully

Joshua Mellor
Planning Director

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Appendix A
Honingham Thorpe Site Location Plan



1:10,000
0 100m 200m 300m 400m 500m

- Site Area: 253.68 Hectares
- Food Enterprise Park
- Approximate location of the new roundabout and link road

Status

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Client: Clarion Housing Group

Project title: Honingham Road, Norwich

Drawing title: Site Location

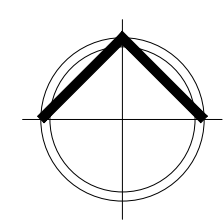
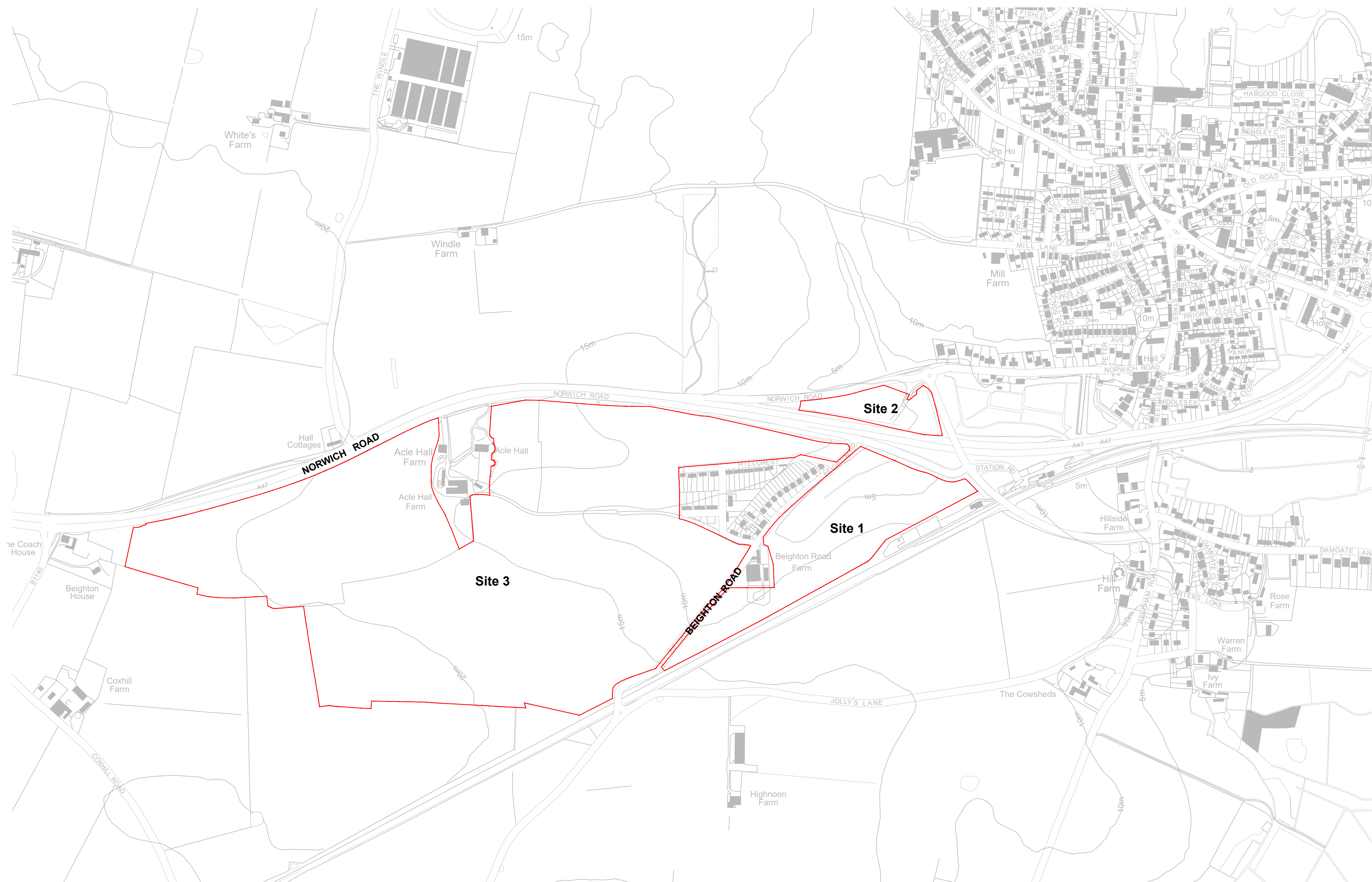
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Appendix B
Acle Site Location Plan



Status

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Client: Clarion Housing Group
Project title: Beighton Road, Acle, Norwich
Drawing title: Site Location Plan

Scale: 1:5000@A2
Date: 11.03.2026
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Appendix C
Acle Strategic Opportunity Plan

Acle - Strategic Opportunity site plan

