

Agenda

Regulation and Planning Policy Committee

Members of the Regulation and Planning Policy Committee:

Cllr Florence Ellis (Chairman)

Cllr Barry Duffin (Vice Chairman)

Cllr Julian Halls

Cllr Phil Hardy

Cllr William Kemp

Cllr Suzanne Nuri

Cllr Jeremy Savage

Cllr Trevor Spruce

Cllr Vic Thomson

Date

Tuesday 5 January 2021

Time

10.00 am

Place

To be hosted remotely at: South Norfolk House Cygnet Court Long Stratton Norwich NR15 2XE

PUBLIC ATTENDANCE

This meeting will be live steamed for public viewing via the following link:

https://www.youtube.com/channel/UCZciRgwo84-iPyRImsTCIng

If a member of the public would like to attend to speak on an agenda item, they can do so by emailing a request to

democracy@s-norfolk.gov.uk, no later than 5.00pm on Thursday 31 December 2020.

Contact

Claire White tel (01508) 533669 South Norfolk District Council Cygnet Court Long Stratton Norwich NR15 2XE

Email: democracy@s-norfolk.gov.uk Website: www.south-norfolk.gov.uk

If you have any special requirements in order to attend this meeting, please let us know in advance

Large print version can be made available



AGENDA

- 1. To report apologies for absence and identify substitute voting members (if any);
- 2. Any items of business the Chairman decides should be considered as matters of urgency pursuant to Section 100B (4) (b) of the Local Government Act, 1972.

 Urgent business may only be taken if, "by reason of special circumstances" (which will be recorded in the minutes), the Chairman of the meeting is of the opinion that the tem should be considered as a matter of urgency;
- 3. To Receive Declarations of Interest

(Please see guidance form and flow chart attached – page 3)

- 4. Minutes of the meeting of the Regulation and Planning Policy Committee held on Monday 12 October 2020 (attached page 5)
- 5. Greater Norwich Local Plan Regulation 19, Pre-submission Publication (cabinet report attached page 11)

Agenda Item: 3

South Norfolk

DECLARATIONS OF INTEREST AT MEETINGS

When declaring an interest at a meeting Members are asked to indicate whether their interest in the matter is pecuniary, or if the matter relates to, or affects a pecuniary interest they have, or if it is another type of interest. Members are required to identify the nature of the interest and the agenda item to which it relates. In the case of other interests, the member may speak and vote. If it is a pecuniary interest, the member must withdraw from the meeting when it is discussed. If it affects or relates to a pecuniary interest the member has, they have the right to make representations to the meeting as a member of the public but must then withdraw from the meeting. Members are also requested when appropriate to make any declarations under the Code of Practice on Planning and Judicial matters.

Have you declared the interest in the register of interests as a pecuniary interest? If Yes, you will need to withdraw from the room when it is discussed.

Does the interest directly:

- 1. affect yours, or your spouse / partner's financial position?
- 2. relate to the determining of any approval, consent, licence, permission or registration in relation to you or your spouse / partner?
- 3. Relate to a contract you, or your spouse / partner have with the Council
- 4. Affect land you or your spouse / partner own
- 5. Affect a company that you or your partner own, or have a shareholding in

If the answer is "yes" to any of the above, it is likely to be pecuniary.

Please refer to the guidance given on declaring pecuniary interests in the register of interest forms. If you have a pecuniary interest, you will need to inform the meeting and then withdraw from the room when it is discussed. If it has not been previously declared, you will also need to notify the Monitoring Officer within 28 days.

Does the interest indirectly affect or relate any pecuniary interest you have already declared, or an interest you have identified at 1-5 above?

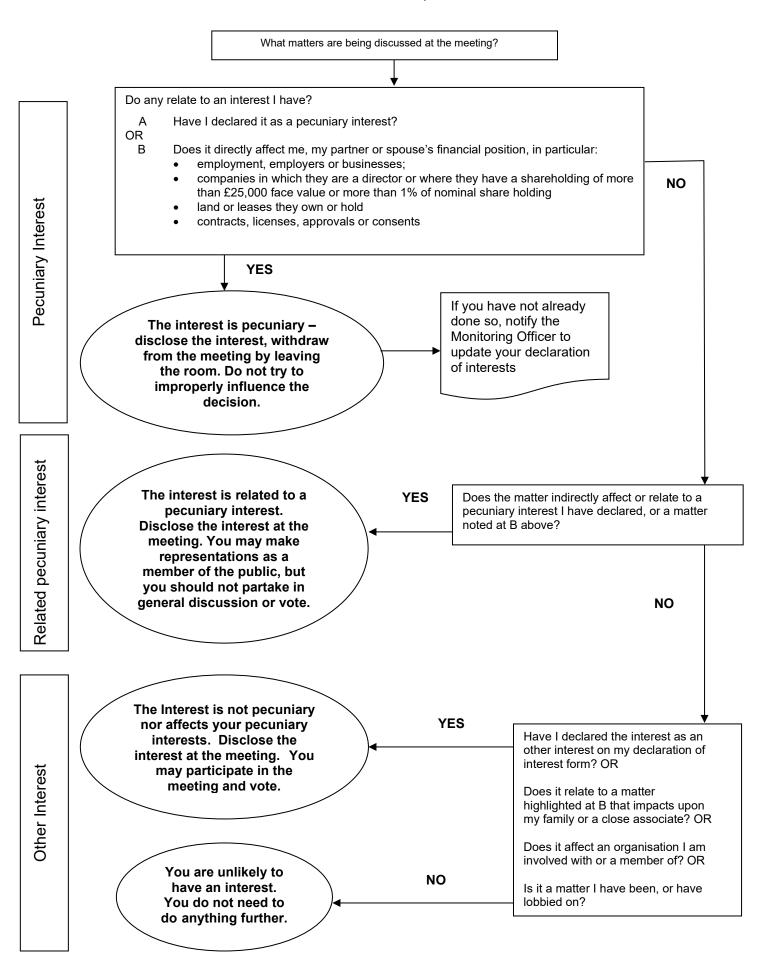
If yes, you need to inform the meeting. When it is discussed, you will have the right to make representations to the meeting as a member of the public but you should not partake in general discussion or vote.

Is the interest not related to any of the above? If so, it is likely to be an other interest. You will need to declare the interest but may participate in discussion and voting on the item.

Have you made any statements or undertaken any actions that would indicate that you have a closed mind on a matter under discussion? If so, you may be predetermined on the issue; you will need to inform the meeting, and when it is discussed, you will have the right to make representations to the meeting as a member of the public but must then withdraw from the meeting.

FOR GUIDANCE REFER TO THE FLOWCHART OVERLEAF.
PLEASE REFER ANY QUERIES TO THE MONITORING OFFICER IN THE FIRST
INSTANCE

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



Agenda Item: 4



REGULATION AND PLANNING POLICY COMMITTEE

Minutes of a meeting of the Regulation and Planning Policy Committee held by video link on Monday 12 October 2020 at 10.00am

Committee Members Present: Councillors: F Ellis, (Chairman) B Duffin, J Halls,

W Kemp, S Nuri-Nixon, J Savage,

V Thomson

Apologies

Cabinet Members in

Attendance:

Councillor:

P Hardy, T Spruce

Y Bendle, J Fuller

Other Members in Attendance: Councillor: V Clifford-Jackson

Officers in Attendance: The Assistant Director Planning (Helen Mellors), Place

Shaping Manager (Paul Harris), Principal Infrastructure and Planning Policy Officer (Simon Marjoram), Business

Improvement Team Manager (Stuart Pontin).

Also in Attendance: Two members of the public (Mr Gledhill and Mr Smith

from Bunwell Parish Council)

68 MINUTES

The Minutes of the meeting held on 17 September 2020 were confirmed as a correct record.

69 SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATION – PROGRESS REPORT

The Principal Infrastructure and Planning Policy Officer presented the report, which set out the progress that had been made in the production of the South Norfolk Village Clusters Housing Allocation Plan (VCHAP).

Following recent revisions to the Local Development Scheme timetable, a Reg.18 consultation on the VCHAP was scheduled to commence in February 2021. Reg.18 was the evidence gathering stage of plan preparation, prior to a consultation on a finalised plan under Reg.19, scheduled for September 2021.

As part of the evidence gathering process all site promoters had been contacted to confirm that they were still promoting sites and to seek any amendments in line with the broad parameters agreed by Members for village clusters.

Despite the response deadline being extended to take account of the Covid-19 situation, a substantial number of existing site promoters did not respond. Therefore, it was decided to retain and assess all existing sites, to ensure the widest possible choice of potential allocation sites.

No further sites had been accepted since the end of May, after the assessment criteria had been agreed by Members. However, site promoters had continued to suggest land for possible consideration and these sites would be submitted as part of the Regulation 18 consultation.

Over 450 sites were currently being considered, an increase from the 350 expected at the beginning of the plan making process. Site assessments were now underway supported by additional officer resources from the Development Management Team.

A technical consultation was issued to relevant bodies in late June. These included the Environment Agency, Natural England and various utility providers.

Some consultees had taken the approach of providing information that required officers to 'self-serve' or search for the source data themselves, which slowed the assessment process. The increase in sites, as well as resource and technical issues in working remotely had also slowed the assessment process. However, despite these difficulties approximately 60 percent of the clusters had now been assessed or assessments on those clusters were underway.

The Sustainability Appraisal of the VCHAP was being carried out by AECOM who had also drafted the appended Scoping Report on which Members' comments were sought.

The Scoping Report established the key issues/objectives for the appraisal stages in preparing the VCHAP. These were based on: Accessibility; Biodiversity; Climate Change – adaptation and mitigation; Communities; Economy; Historic Environment; Housing; Land and Soils; Landscape; Transport; and Water. These topics would form part of the site assessment process.

In addition, there was a Habitat Regulations Assessment (HRA) of the plan. This would inform the plan-making process by identifying constraints, opportunities and recommendations for the VCHAP.

An update to the 2017 Central Norfolk Strategic Housing Market Assessment was being considered and could be used as evidence around the size, type and tenure of housing needed to the meets the VCHAP requirements. The VCHAP would also contain overarching policies dealing with housing density, design and general allocation requirements.

In addition, each site proposed for allocation was likely to have a site specific policy for development, which would include areas such as protection of specific features, landscaping and access points.

Members were asked to note that should the site assessments prove too time-consuming, it might be necessary to exclude site specific policy text from the February 2021 Reg. 18 document and instead seek stakeholder's views. A similar approach could be taken to the overarching policies should the required supporting evidence still be pending.

Many aspects of plan production were being met within the existing resources of the Place Shaping Team and it was currently expected that the costs associated with the VCHAP could be met through the budget made available for the Village Cluster plan.

The Committee was advised that the VCHAP was reliant on the GNLP as a basis on which to allocate housing in smaller settlements, and also in setting the overall distribution of development including the housing requirement for the Village Clusters. However, the Government's recent White Paper 'Planning for the Future' proposed a number of fundamental changes to the Local Plan format and process that threw into question the GNLP being adopted in its current form.

Mr Gledhill addressed the Committee and in response to a query it was confirmed that the sites listed in the Appendix B was the final list that was being consulted on, although that did not preclude any further sites being put forward at the Reg.18 stage.

Mr Gledhill expressed concern that the Minutes from the Regulation and Planning Policy Committee meeting in May did not appear on the Council's website until September. It was confirmed that today's Minutes would be available on the website within two weeks.

Mr Gledhill also emphasised the importance of the update being presented at this meeting and that parish councils should be made aware of such an important document. In response, the Chairmen advised the meeting that Ward Members kept their parishes informed when items of interest to them were being discussed.

Mr Gedhill also noted that office space in Norwich was likely to be converted to residential accommodation, as the trend for working from home continued, which could have a significant effect on the number of rural homes required, as well as the need for a new settlement in Greater Norwich.

The Leader advised the Committee that 450 sites had come forward to meet the housing need in small sites that would not overwhelm existing settlements or require expensive infrastructure and could be brought forward by small local developers. He commended the Sustainability Appraisal, but noted that it had been superseded by events, which had led to a pivotal change in the economy. Therefore, it should be ensured that the Council does not allow itself to be constrained by factors that no longer had the same relevance. He noted other factors created by the current crisis, and that there was now nothing more sustainable than superfast broadband to allow people to work from home. He also emphasised that the Plan was for 1,500 out of a total of 45,000 in Greater Norwich and, therefore, must be kept in perspective and should not be turned into an exercise that took up an inordinate amount of time and effort. Finally, he asked that before going out to consultation, the maps be amended to clearly show the clusters being proposed. Also included should be summary statistics regarding their size, location and a realistic estimate of numbers for each site.

In response to a query, the Principal Infrastructure and Planning Policy Officer confirmed that Members of the Committee could still canvass opinion when sites were brought to them for inclusion in the consultation document and suggest alternatives, if they felt any were inappropriate.

A Member thanked the Principal Infrastructure and Planning Policy Officer for answering a number of questions that he had submitted by email prior to the meeting, but noted that whilst work was being carried out it was being overtaken by the Government's Planning White Paper, which would propose much higher density housing than was currently being planned for.

The Principal Infrastructure and Planning Policy Officer then responded to the questions submitted by the Member that had not already been covered.

- It was confirmed that sites larger than the small sites required for the VCHAP would have to be submitted through the Greater Norwich Local Plan process and would not be included within the village clusters consultation.
- A balance was being sought between the provision of housing and sustainable travel commensurate with a rural area and this would be articulated throughout the VCHAP and the Sustainability Appraisal.
- The term 'where possible' used in reference to transport infrastructure between village clusters reflected the reality that this would not always be achievable in rural locations.
- The Government already used a formula to decide on the number of dwelling required and categorised the District into areas for allocations development boundaries and the countryside. The White Paper should simplify this process, however.
- The uptick in CO₂ emissions was shown in the report, as a trend that the Council would like to reduce.
- The objective to provide 'sustainable transport' aimed to be a package of measures, including short everyday journeys viable on foot and developing clusters that sustain local services.
- A reference to affordable housing would be added to page 80 of the Scoping Report.
- The Habitats Regulations Assessment, was a technical advice report that would not usually be for public consumption, if at a later stage it did go out as part of the consultation it would include an executive summary.

In summing up, the Chairman emphasised that the Allocation Plan was for village clusters, rather than individual parishes.

RESOLVED

- 1. to note the content of the progress report; and
- 2. to note the draft Sustainability Appraisal Scoping Report.

70 PLANNING ENFORCEMENT PLAN AND STRATEGY

The Business Improvement Team Manager introduced the report, which presented an updated Enforcement Plan and Strategy, following an audit of the Planning Enforcement Service in early 2020.

The Plan would now include a more proactive approach towards the monitoring of the commencement of developments with planning permission to ensure compliance with associated conditions.

To ensure that Members had an overview of current cases it was also proposed that a monthly report be provided to all Members, which would highlight work being undertaken. Training would also be provided to allow Members to make best use of this information.

The Leader advised the meeting that he did not consider that sufficient weight had been given in the draft Enforcement Plan to matters of urgency and public interest, where rapid action was required.

In response, the Business Improvement Team Manager drew Members' attention to the section in the Plan, which provided for prioritisation of issues where the greatest harm was being caused on a case by case basis.

In response to a query, it was confirmed that the intention was that the Plan would be common to both South Norfolk and Broadland District Council.

A Member suggested that the language in the Plan should be made more explicit and he suggested that one of the areas prioritised should be where there was clear and wilful disregard for the law.

In response the Business Improvement Team Manager noted the concerns raised, but also emphasised that a value judgement about the level of harm caused would often need to be made. However, he confirmed that officers would prioritise enforcement, where harm was caused.

The Chairman proposed the recommendations in the report, subject to the inclusion of the suggestions made by Members in respect of urgency in dealing with actions causing severe harm and in cases where there had been a clear and wilful disregard of the law.

RESOLVED

To recommend to Cabinet

- 1. To agree the use of the Enforcement Plan at Appendix 1 for the Planning Enforcement Service at South Norfolk Council, subject to the inclusion of the suggestions made by Members above; and
- 2. To agree the use of the Enforcement Strategy at Appendix 2 for the Planning Enforcement Service at South Norfolk Council.

| (The meeting concluded 11.28 am) |
|----------------------------------|
| |
| Chairman |



Agenda Item: 5 Cabinet 11 January 2021

Greater Norwich Local Plan – Regulation 19, Pre-submission Publication

Report Author(s): Paul Harris

Place Shaping Manager

01603 430444

paul.harris@broadland.gov.uk

Portfolio: The Economy and External Affairs

Ward(s) Affected: All

Purpose of the Report:

This report seeks the agreement of Cabinet to publish the Greater Norwich Local Plan under regulation19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Recommendations:

- To agree to publish the Greater Norwich Local Plan under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012;
 and,
- 2. Delegate authority to the Assistant Director for Planning in consultation with the Portfolio Holder for The Economy and External Affairs to make any minor or factual corrections to the GNLP ahead of its publication.

1 SUMMARY

- 1.1 The Greater Norwich Development Partnership Board has recommended that Broadland District, Norwich City and South Norfolk Councils agree to publish the Regulation 19 Pre-Submission Draft Greater Norwich Local Plan(GNLP). This is the formal publication of the document under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 to enable representations to come forward that can be considered at examination.
- 1.2 The proposal was reported to the overseeing Greater Norwich Development Partnership Board meetings on the 7 and 16 December 2020. The GNDP reports setting out the detail of the proposals are appended to this report.

2 BACKGROUND

- 2.1 Broadland District Council, Norwich City Council and South Norfolk Council are working together with Norfolk County Council to prepare the Greater Norwich Local Plan (GNLP). The GNLP builds on the long-established joint working arrangements for Greater Norwich, which delivered the Core Strategy (JCS). 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 includes strategic planning policies and allocates individual sites for development.
- 2.2 When adopted the GNLP will become part of the Development Plan, and will replace the current Joint Core Strategy and Broadland Site Allocations DPD. The Growth Triangle Area Action Plan and the Broadland District Development Management Policies Document will not be replaced, although there may be elements of the GNLP that add to, amend or replace parts of those documents.
- 2.3 The GNLP is being prepared by a team of officers from Broadland, Norwich and South Norfolk. The Greater Norwich Development Partnership Board (GNDP) exercises political leadership for the planning activities carried out jointly by the Greater Norwich Local Planning Authorities. The board is made up of three member from Broadland District Council, Norwich City Council and South Norfolk Council and a member from the Broads Authority. The group is supported in its role by Director level representation from each Local Authority.
- 2.4 It is proposed to publish the GNLP under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 from 1 February to 15 March 2021. Regulation 19 is part of the formal stage of plan making and follows on early consultations under Regulation 18. Regulation 19 is not a consultation per se but rather allows stakeholders to submit representations in respect of whether the plan is: 1) legally and procedurally compliant; 2) Sound¹; and 3) in compliance with the Duty to Cooperate. Representations made at Regulation 19 will be considered as part of any the independent examination into the GNLP.

¹ Soundness is defined in paragraph 35 of the NPPF and requires a Local Plan to be positively prepared, justified, effective and consistent with national policy.

- 2.5 The decision to submit the GNLP for independent examination will need to be taken by Full Council following the completion of the Regulation 19 stage and in light of any representations made.
- 2.6 The GNDP considered the Pre-submission version of the GNLP at its meetings on the 7 and 16 December and agreed to recommend to councils that they should agree to publish the Regulation 19 Pre-Submission Draft Greater Norwich Local Plan Strategy and Sites Document. The GNDP reports related to the Strategy and Sites documents are appended to this report. Appendix 1 is the GNDP report of 7 December on the Strategy, included with the report are the key changes between the proposed Regulation 19 Pre-Submission Draft Greater Norwich Local Plan Strategy and the Regulation 18C document that was previously agree by Cabinet and consulted upon at the start of 2020. Further changes to the strategy that have been made in response to discussions with the GNDP are set out in appendix 2 and 3. Appendix 4 is the report on the Sites document.
- 2.7 The final Regulation 19 Strategy and Sites Documents that are proposed to be published under regulation 19 have been published at:

 https://www.greaternorwichgrowth.org.uk/planning/greater-norwich-local-plan/regulation-19-cabinet-papers/. Due to the size of the Strategy and Sites Documents they have not be reproduced separately to accompany this report.
- 2.8 The first part of the GNLP is the Strategy element of the document. The Strategy document comprises:
 - A profile of Greater Norwich that describes its key characteristics;
 - the vision and objectives of the plan;
 - statements on how the plan prioritises delivery and addresses climate change issues;
 - 7 strategic policies that set out the overall growth strategy and policies for the the achievement of sustainable communities, environmental protection and enhancement, strategic infrastructure, homes, the economy and the distribution of new homes and commercial /employment uses across the Settlement Hierarchy. The Settlement Hierarchy comprises:
 - the Norwich urban area and fringe parishes within Broadland and South Norfolk;
 - the main towns (including Aylsham, Diss, Long Stratton and Wymondham);
 - the key services centres (including Acle, Blofield, Brundall, Hethersett, Hingham, Loddon and Chedgrave, Poringland, Reepham and Wroxham);
 - o the village clusters across Broadland and South Norfolk; and,
 - o small scale windfall housing development and new settlements;

- a suite of appendices setting out infrastructure requirements, a glossary, the monitoring framework, details of retained and superseded plans, an explanation of the number of homes allocated to village cluster areas in Broadland, a housing trajectory, and a list of places that may have further development under the windfall housing development policy.
- 2.9 The detail content of these sections is set out within the strategy document available via the weblink provided, with further explanation in the GNDP reports referred to in paragraph 2.6 and appended to this report. For the sake of brevity, further detail of the policies is not provided here.
- 2.10 The second part of the strategy is the sites document which contains the allocation of site to deliver the GNLP strategy. This includes undeveloped allocations carried forward from the Broadland, Norwich and South Norfolk Local Plans alongside new allocations for housing, employment, mixed uses (typically a mixture of housing and employment), recreation, open space and community uses.
- 2.11 The sites document is divided into chapters that comprises: Norwich and the fringe parishes, Main Towns, Key Service Centres, Broadland Village Clusters; and, non-residential allocations in South Norfolk villages. Maps and sites policies for each of the allocated sites. A contingency site for circa 800 homes at Costessey has also been included, with specific triggers for its release.
- 2.12 The allocation of land for housing development in the South Norfolk Village Cluster area is not included as this is being taken forward separately through the preparation of the South Norfolk Village Cluster Housing Allocation Plan.

3 CURRENT POSITION

- 3.1 The adopted Development Plan makes provision for the housing and economic growth needs of the area to 2026, although some provision for development beyond this period is made within the Growth Triangle Area in Broadland.
- 3.2 The adopted development plan for South Norfolk comprises the:
 - Joint Core Strategy for Broadland, Norwich and South Norfolk, adopted March 2011, with amendments adopted January 2014
 - Development Management Policies Document, adopted October 2015
 - Site Specific Allocations and Policies Document, adopted October 2015
 - Wymondham Area Action Plan, adopted October 2015
 - Long Stratton Area Action Plan, adopted May 2016
 - Adopted Neighbourhood Plans
- 3.3 When completed the GNLP will become part of the Development Plan, and will replace the current Joint Core Strategy and Site Specific Allocations and Policies Document. In doing so it will ensure that the Strategic Policies remain up-to-date and that the housing and jobs needs of the area continue to be met to 2038.

- 3.4 In respect of managing development through the determination of planning applications, to the extent that the adopted development plan policies are material to an application for planning permission the decision to grant or refuse permission must be taken in accordance with the development plan unless there are material considerations that indicate otherwise.
- 3.5 Whilst policies of the development plan do not become "out-of-date" simply through the passage of time, it is important that plans are kept up-to-date in order to ensure that the policies that they contain carry full weight in the determination of planning applications.
- 3.6 In its Planning for the Future document published in March 2020, government also set out its intention to set a deadline of December 2023 for all local authorities to have an up-to-date local plan. Indicating that government will prepare to intervene where local authorities fail to do so.
- 3.7 The GNLP will not replace the Wymondham or Long Stratton Area Action Plans or the Development Management Policies Document, although there may be elements of the GNLP that add to, amend or replace parts of those documents.
- 3.8 Further consideration will be given to the need to update those plans not to be replaced will be considered once the GNLP is adopted and in light of any wider changes to the planning system as consulted on by government in the Planning for the Future White Paper, August 2020.

4 PROPOSED ACTION

4.1 It is proposed that Cabinet approve the draft GNLP for publication under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 from 1 February to 15 March 2021.

5 OTHER OPTIONS

- 5.1 Cabinet may seek amendments to the draft GNLP prior to its publication or resolve not to approve the draft GNLP for publication.
- 5.2 Any amendments would however need to be agreed independently by each of the three Councils. Therefore, any decision to propose amendments would therefore likely revert to the GNLP for further discussions between the Councils representatives and would lead to delays in the publications of the draft GNLP. Such delays may be substantial as publication is likely to need to be delayed until after the purdah period for the Norwich City elections between the end of March and early May.
- 5.3 A resolution not to approve the GNLP for publication would also cause significant delay in the adoption of the plan. The length of such a delay would depend on the reasons given for determining not to give such approval.

6 ISSUES AND RISKS

- 6.1 **Resource Implications** The GNLP is produced under an agreed budget with contributions from the three councils. Existing staff resources from each of the three authorities is also utilised to support the production of the plan. Delays in the progress of the plan are likely result in further costs being borne by each of the three authorities.
- 6.2 **Legal Implications** When adopted the GNLP will become part of the Development Plan for the area. In accordance with section 70(2) of the Town and County Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004, To the extent that development plan policies are material to an application for planning permission the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise.
 - Section 3 sets out the implications for decision making of maintaining an up-to-date Development Plan.
- 6.3 **Equality Implications** An equalities impact assessment is being produced alongside the GNLP. It is intended that the assessment related to the Regulation 19 draft GNLP, will be published at https://www.greaternorwichgrowth.org.uk/planning/greater-norwich-local-plan/regulation-19-cabinet-papers/, prior to the documents consideration by Cabinet.
- 6.4 **Environmental Impact** The GNLP has been subject to Sustainability Appraisal (Incorporating Strategic Environmental Assessment) and Habitat Regulations Assessment. It is intended that the assessments related to the Regulation 19 draft GNLP, will be published at https://www.greaternorwichgrowth.org.uk/planning/greater-norwich-local-plan/regulation-19-cabinet-papers/, prior to the documents consideration by Cabinet.
- 6.5 **Crime and Disorder** Policy 2 of the Regulation 19 draft of the GNLP requires development proposals to "create inclusive, resilient and safe communities.
- 6.6 **Risks** The Regulation 19 draft of the GNLP has been prepared under an accelerated timetable. As such it was not possible to carry out the Regulation 18D consultation that was agreed by the GNDP board on 10th July 2020 and subsequently agreed by councils' through updates to their Local Development Schemes (LDS).

A number of mitigations measures have been put in place through the acceleration programme to minimise the additional risk posed by removing this stage of consultation.

7 CONCLUSION

- 7.1 For the reasons set out in section three, the timely progress of the GNLP is important in order to ensure that the Council's Development Plan remains effective and that the policies of the Development Plan continue to have full weight in the determination of planning application.
- 7.2 The GNDP Board has overseen and scrutinised the emerging GNLP and have recommended that councils agree to Publish the draft GNLP under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 from 1 February to 15 March 2021.

8 RECOMMENDATIONS

- 8.1 Cabinet to agree to:
 - Publish the draft GNLP under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 from 1 February to 15 March 2021;
 and,
 - 2. Delegate authority to the Assistant Director for Planning in consultation with the Portfolio Holder for The Economy and External Affairs to make any minor or factual corrections to the GNLP ahead of its publication.

Background Papers

None

Agenda Item: 6

| Greater Norwich Development Partnership (GNDP) | | |
|--|--|--|
| Report title | Greater Norwich Local Plan Regulation 19 Publication Stage – Interim Pre-submission Draft Strategy for representations on soundness and legal compliance | |
| Date | 7 th December 2020 | |

Recommendation

That the Board:

- Recommends to the councils that they should agree to publish the Regulation 19
 Pre-submission Draft Greater Norwich Local Plan Strategy appended to this report for representations on soundness and legal compliance;
- Delegates authority to directors to make changes agreed today and at the GNDP meeting on 16th December, plus other minor changes to the plan, prior to it being reported to councils in January.

<u>Introduction</u>

- The Draft Greater Norwich Local Plan (GNLP) consists of two parts. These are the Strategy and the Sites document. This report covers the Regulation 19 presubmission Strategy (see appendix 1). The Regulation 19 Sites document will be considered by the GNDP on December 16th.
- 2. The GNDP meeting on 30th September 2020 agreed a revised timetable for plan preparation and instructed officers to prepare a Regulation 19 pre-submission version of the plan for consideration by the GNDP Board in December 2020. The agreed timetable is summarised below:

| Timetable revised September 2020 | | |
|--|----------------------------|--|
| Reg. 19 plan endorsed by GNDP | From 7 December 2020 | |
| Cabinets agree Reg. 19 plan | Mid-January 2021 | |
| Reg. 19 publication for soundness and legal compliance | 1 February – 15 March 2021 | |
| Submission of the GNLP to the Secretary of State | July 2021 | |
| Public Examination | Nov/Dec 2021 | |
| Consultation on proposed main modifications | Mar/Apr 22 | |
| Publication of Inspector's report | July 22 | |
| Adoption of the Greater Norwich Local Plan | Sept 22 | |

3. This report, including the comprehensive version of the draft Regulation 19 plan, shows that the great majority of the work on the strategy has been completed. It

- also covers the evidence base and identifies that some elements of this will be developed further ahead of submission of the plan in summer 2021.
- 4. The draft Regulation 19 plan has an end date of 2038. This is needed to conform with current national planning requirements. However, it should be noted that due to the Government's commitment to reform plan-making, it is highly likely that the GNLP will be superseded by a subsequent local plan produced under the new planning system within a few years of its adoption.
- 5. This means that the GNLP will play an important role in providing continuity between the present and new plan-making systems. In line with clear guidance from the Government that plan-making should continue ahead of the implementation of the new system, the GNLP's adoption scheduled for 2022 will allow us to address housing need, plan for jobs growth and to protect and enhance our special environment in the near future.
- 6. The GNLP strategy also provides a "direction of travel" for the longer term by identifying opportunities for growth which could be taken forward to meet additional needs for the next local plan. By having a specific policy on the issue, it establishes that a significant part of this long-term need will be met in a future plan through the development of a new settlement or settlements.
- 7. This is supported by the GNLP providing a timetable for work on new settlements to be progressed in tandem with taking this plan to adoption. This will allow the long process of choosing appropriate sites for a new settlement or settlements to be finalised through the next plan.

The Regulation 19 stage

- 8. It is important to note that, as the Regulation 18 consultation stage has informed the content of the plan, the Regulation 19 stage is not a general consultation.
- 9. Its role is to seek comments on soundness and legal compliance to assist:
 - members in deciding whether to submit the GNLP for examination in summer this year;
 - the government appointed Planning Inspector to decide on the content of that examination.
- 10. Respondents to the Regulation 19 Publication version of the plan will be directed to government advice on soundness matters in the National Planning Policy Framework¹.

10

¹ Available <u>here</u>. See paragraph 35.

The Strategy

11. Significant headway has been made with producing the Regulation 19 strategy so that a comprehensive draft is attached. This will require updates before it is considered by cabinets in January to allow its publication. The recommendation for his report delegates authority to directors to make any changes to the appended document which are agreed today and at the GNDP meeting on 16th December. Some limited updates will also be produced to further improve the already detailed evidence base (see below).

Changes to the Strategy

- 12. The key change between the Regulation 18C draft plan consulted on early in 2020 and the Regulation 19 draft plan appended to this report is that overall housing numbers have been increased by just over 5,000 homes.
- 13. The reason for this change is that while the strategy continues to address local housing need as identified using the 2014-based projections as required by the Government's standard methodology, it also recognises that the 2018-based projections for Greater Norwich indicate that household growth may be higher. This also responds to the likely direction of travel for higher housing numbers for the area strongly indicated by Government.
- 14. The strategy does this by including a significant buffer (22%). Table 1 below from the appended Regulation 19 strategy sets out how the resulting total housing figure from 2018 to 2038 for the GNLP has been established and will be provided for. This includes the plan making use of a proportion (around 30%) of its projected windfall delivery as a windfall allowance and an estimated number of homes to be provided on small sites through policy 7.5.
- 15. A contingency site for 800 homes at Costessey remains in the GNLP but is not included in the overall housing numbers below. Along with the significant buffer, this helps to ensure that housing needs will be met through the plan.

11

Table 1 Establishing the Plan's total housing figure (table 6 in the appended strategy)

| | Number of Homes | | Explanation |
|---------|--------------------------|--------|---|
| Α | Local housing need (2018 | 40,541 | The minimum local housing need figure has |
| | to 2038) | | been identified using the Government's |
| | | | standard methodology using 2014-based |
| | | | projections as required by transitional |
| | | | arrangements for plan-making. |
| В | Delivery 2018/2019 and | 5,240 | The number of homes built in 2018/2019 and |
| | 2019/20 | | 2019/20 (including student accommodation |
| | | | and housing for the elderly). |
| С | Existing commitment (at | 31,398 | The existing commitment is the undelivered |
| | April 2020) to be | | sites which are already allocated and/or |
| | delivered to 2038 | | permitted, with parts of or whole sites unlikely |
| | (including uplift on | | to be delivered by 2038 excluded. Uplifts on |
| | allocated sites) | | existing allocations made through this plan are |
| | | | included here. |
| D | New allocations | 10,694 | These are the homes to be provided on new |
| | | | sites allocated through the GNLP (9,107), the |
| | | | South Norfolk Village Clusters Housing Sites |
| | | | Allocation Plan (1,200) and the Diss and area |
| | | | Neighbourhood Plan (200). |
| E | Homes delivered through | 800 | Policy 7.5 provides for delivery of 3 to 5 homes |
| | policy 7.5 | | on small scale sites adjacent to settlement |
| | | | boundaries or on infill sites within |
| | | | recognisable group of dwellings ² . |
| F | Windfall allowance | 1,360 | There is a limited reliance on windfall sites. |
| | | | Evidence provides an estimated around 4,450 |
| | | | homes resulting from windfall development |
| | | | during the remainder of the plan period. As |
| | | | windfall is likely to remain robustly high this |
| | | | allows part of this evidenced windfall delivery |
| | | | to be used to demonstrate delivery of some of |
| | | | the total housing figure. |
| B + C + | Total housing figure | 49,492 | Delivery (B), commitments (C), new allocations |
| D + E + | | | (D), homes delivered through policy 7.5 (E) and |
| F | | | the windfall allowance (F). This provides a 22% |
| | | | buffer to cater for the potential for higher |
| | | | growth rates. It also mitigates any risk of non- |
| | | | delivery of sites to ensure delivery of local |
| | | | housing need. |

² See policy 7.5 and appendix 7 for further information.

- 16. Table 2 below summarises the changes which have been made to the strategy following Regulation 18C consultation early in 2020. It also provides a justification for those changes.
- 17. Further information on the changes to housing numbers is also in table 2. This includes the locations identified for further growth in comparison with the Regulation 18C draft version of the plan, along with the limited number of sites which are no longer included in the plan.

Table 2 - Summary of substantive changes from the Reg. 18C to the Reg. 19 GNLP Strategy

| Chapter/Policy | Summary of Changes | Reason for Changes |
|----------------------------------|---|--|
| | Introductory Sections | |
| Foreword | Wording provided in separate document for consideration today. | To provide an update so that the text is suitable for the submission document. |
| 1. Introduction | Clarification of the plan being produced under the Government's transitional arrangements, the role of the strategy and which policies are strategic. Revised text emphasises that the GNLP provides continuity and an excellent basis for the new planning system promoted through "Planning for the Future". | To reflect changes that will result from "Planning for the Future", including the GNLP providing the strategic context for other plans. |
| | Updated references to the proposed ban on the sale of new petrol and diesel cars now starting in 2030. | In response to consultation comments and government announcements. |
| 2. Greater Norwich Profile | Clarification of the role of the spatial portrait in identifying the current situation and key issues locally rather than setting policy. Clarifications to the text and various updates to data and maps. | In response to comments from a number of consultees, largely on factual issues, including Natural England, Historic England and the Environment Agency. |
| 3. Vision and Objectives | Changed to increase the emphasis on: 1. enhancing the environment, water quality and biodiversity net gain; 2. local character and high-quality design; 3. access to employment; 4. reducing health inequalities, use of new technologies to access | In response to comments from a number of consultees including Natural England, Historic England, the Environment Agency, the Highways Agency, Active Norfolk and the Town and Country Planning Association (TCPA). |

| 4. Delivery Climate Change Statemer | Statement to reflect the likely replacement of CIL by the | Changes also reflect current and emerging economic changes and the publication of the draft Local Industrial Strategy. General support through the consultation for the comprehensive approach taken in the plan on these two key issues and the clear way the statements set out that approach. | |
|--|--|---|--|
| | Continued use of nationally produced district wide data for carbon emissions and the link to national carbon reduction targets in plan will be retained (some consultees had suggested having local monitoring and targets). | No change to the monitoring for climate change as it is neither possible nor desirable to set up plan specific monitoring. Contributing to lowering emissions to help meet targets nationally reflects the role local plans can play among many other plans and initiatives in tackling climate change. | |
| The Strategy | | | |
| Policy 1 | Explanation included on the use of | To clarify how the plan is being taken | |
| The Growth | transitional arrangements to determine | forward under the changes | |
| Strategy | the housing numbers for this plan. | introduced by the supporting documents for "Planning for the Future". | |

| | The strategy now includes opportunities for an additional 5,000 homes, though no changes have been made to the overall hierarchy. | Changes have been made the opportunity and flex accommodate around 5, additional homes to record the 2018-based househout indicate that growth may than in the 2014-based publich are used in the play additional growth is in the locations and from the for sources: | ibility to 000 ognise that old projections of be higher orojections an. The ne following |
|--|---|--|--|
| | | Location/source | Homes |
| | | East Norwich | 2,000 |
| | | Sites in Colney (200), | 840 |
| | | Cringleford (50), | |
| | | Harleston (150), | |
| | | Wymondham (50), | |
| | | Aylsham (250) and | |
| | | Acle (140). | |
| | | Delivery from policy 7.5 | 800 |
| | | Windfall allowance | 1,360 |
| | | TOTAL | 5,000 |
| | | | |
| | Limited further updates to housing numbers in tables. | To reflect updated commincluding housing windfapermission in 2019/20 ausite numbers and allocat | ills granted nd changes to |
| Policy 2 Sustainable Communities | Stating that the indicative densities are net rather than gross in policy, with a resulting need to amend the glossary to define the terms. | To provide clarity and su focus on appropriate der different parts of the are the intentions of "Planni Future". | nsities in a in line with |
| | Expansion of the landscape clause of the policy to refer to local character including landscape, townscape and heritage. | Primarily in response to England's view that the pon landscape was too na | revious focus |

| Inclusion of a requirement for public art (where appropriate). The addition of a viability clause to the energy efficiency element of the policy. | In response to further internal review of policies, this is a successful part of existing JCS policy. In response to viability considerations. If the "Future Homes Standard" (scheduled for 2020) is implemented as consulted on and preferred by government in 2019, there will be no need to retain a local energy efficiency requirement as higher standards than those currently proposed in the GNLP will be required |
|--|--|
| Text and policy to refer to the newly published National Design Guide. | nationally. To reflect recent publication of this guidance and in line with "Planning |
| | for the Future". |
| Replace reference to the optional use of "Building for Life 12" (or any successor) to promote good urban design on housing developments with "Building for a Healthy Life" (or any successor). | To reflect the updating of Building for Life 12 to Building for a Healthy Life urban design tool. This change to Building for Life has been made to place a greater focus on design promoting active lifestyles. Using the optional standard in this plan helps to ensure that good urban design is a priority ahead of the likely future requirement of site-specific design codes set out in "Planning for the Future". |
| The "requirement" for masterplan / community engagement on 200+ dwelling sites is replaced by "encouragement". | In response to consultation comments – encouragement more closely reflects NPPF policy. |
| Amendments to water management and flood risk policy. | To reflect consultation comments, primarily from the Environment Agency, and to better reflect NPPF policy. |

| | - · · · · · · · | - a · · · |
|----------------|--|--|
| | Built and Historic Environment | To reflect concerns expressed by |
| | | consultees, particularly from Historic |
| | Substantial amendments to the text and | England, over the perceived lack of |
| | policy including: | detail in policies. The revised wording |
| | | has involved discussions over the level |
| | A reference to the need for | of detail which is appropriate in a |
| | developers to make use of | strategic plan and the role that |
| | existing guidance on historic | existing development management |
| | areas, such as conservation area | policies and supplementary guidance |
| | appraisals, along with documents | such as conservation area appraisals |
| | produced by Historic England, | play in relation to the historic |
| | particularly concerning tall | environment. |
| | buildings; | |
| | A policy requirement to | |
| | undertake Heritage Impact | |
| | Assessments where required. | |
| | | |
| Policy 3 | Clearer language on harm to and | |
| Environmental | retention of historic assets. | |
| Protection and | Natural Environment | |
| Enhancement | | |
| | Greater clarity on policy requirements | In response to a perceived lack of |
| | for natural environment assessments. | detailed policy requirements from the EA and NE. |
| | | EA and NE. |
| | A policy requirement for 10% | This previously flagged up approach |
| | biodiversity net gain. | reflects the passage of the |
| | Joseph Grand Market Samm | Environment Bill through parliament |
| | | and comments from the EA and NE, |
| | | amongst others. |
| | | |
| | Povised toyt and policy on mitigating | This approach has been worked on |
| | Revised text and policy on mitigating impacts on HRA Directive protected sites | for a number of years and is |
| | through the provision of informal | important to ensure that the GNLP |
| | greenspace and payments to make the | meets legal requirements. |
| | sites themselves resilient, with the | meets legal requirements. |
| | amount to be confirmed shortly through | |
| | the NSPF funded study (likely just over | |
| | £200 per home). | |
| | Updates to text on transport issues. | To reflect the passage of time since |
| Policy 4 | | the Reg. 18C draft plan was produced. |
| Strategic | Inclusion of "changing attitudes to | To reflect its inclusion as part of the |
| Infrastructure | travel" as an aim of the Transport for | Transport for Norwich Strategy. |
| | Norwich Strategy. | , |
| L | | 1 |

| | Deletion of reference in policy to the | To reflect the fact that there is |
|----------------|--|---|
| | cross-valley link, with a reference to its | currently no scheme for this proposal. |
| | inclusion in Transport for Norwich | |
| | included in the text. | |
| | Limited changes to the text and policy re. | In response to comments from |
| | water infrastructure. | Anglian Water. |
| | Possible updates to appendix 1 setting | Work is ongoing on updates to the |
| | out the infrastructure requirements to | Greater Norwich Local Plan |
| | support growth (including health care | Infrastructure Needs Report |
| | provision). | (GNLPINR) which informs the content |
| | | of appendix 1. The work is scheduled |
| | | to be completed by the end of the |
| | | year and any resulting updates will be |
| | | included in the Reg. 19 plan to be |
| | | considered by Cabinets in January. |
| Policy 5 Homes | Minor changes to clarify that standard | In response to further internal review |
| | affordable housing obligations apply to | of policies. |
| | purpose-build student accommodation. | |
| | Text has been amended to make it clear | The election is in response to the |
| | | The clarification is in response to the |
| | that to meet the need for specialist retirement units as well as other forms | recent publication of county wide |
| | | evidence showing that there is a need |
| | of specialised housing, policy 5 supports delivery of such accommodation on | for 3,857 specialist retirement units |
| | housing sites with good access to local | (sheltered or extra care housing) to |
| | services including on sites allocated for | 2038. |
| | residential use. The aim of this is to | The recent permission for a care |
| | integrate older people and others with | home for the elderly and supported |
| | specialist housing needs with the wider | living units for adults with learning |
| | community. Some specific site | difficulties on the R18 Mousehold |
| | allocations are also made to help to | Lane allocated housing site on the |
| | meet the need. | outer ring road in Norwich illustrates |
| | meet the need. | that sites will come forward to meet |
| | This approach means that it is not | specialised needs. This is because |
| | necessary or desirable to meet the full | there is a clear demand for such |
| | need through specific allocations. | accommodation. |
| | need in odgi specine unocutions. | |
| | Further to this, the text now clarifies | |
| | that: | |
| | | |
| | Development management | |
| | officers will ensure that the need | |
| | for specialist housing for the | |
| | elderly and others with | |
| | specialised needs is considered | |
| | on all housing schemes and | |
| | on an noasing selectives and | |

advise applicants on the most upto-date evidence of need;

- On site allocations with an element of specialist housing in the policy (Taverham, Harleston, Aylsham and Barrack Street, Norwich) are included in the plan;
- A specific allocation for such accommodation has now been made at Colney Hall.

Policy 5 includes a criteria-based approach for considering Gypsies and Travellers and Travelling Show People sites. Outside of the local plan process, work remains to generate a supply of sites for Gypsies and Travellers and Travelling Show People.

Sites have not been submitted to the GNLP. Consequently, work is ongoing to confirm that current evidenced need is correct (51 pitches for Gypsies and Travellers from 2022 to 2028 and a Travelling Show Peoples' site) and to provide sites through the planning application process to meet that need.

Text amended to reflect current economic uncertainty.

Policy changes on the economy:

- Clarify that opportunities for sustainable access to employment sites should be maximised through development proposals and infrastructure investment;
- Change terminology to reflect the NSPF, identifying "key strategic employment sites" (consequential changes to policy 1 and the key diagram required);
- Provide minor clarifications on the airport site leading to minor changes to employment land allocation figures overall.

Further updates to evidence-based text and policy on economic growth potential, the amount of employment land needed and key trends in employment location will be made on completion of the addendum (see box to the right).

Changes reflect consultation responses and current economic uncertainty, whilst retaining overall national policy approach of having a retail hierarchy, supporting growth in centres and allowing for increased flexibility.

An addendum is being produced to the 2017 GVA Economy, Retail, Town Centres Study which is to be completed by the end of November 2020. This provides advice on any further policy updates required beyond those made in response to the consultation which can be incorporated into the Reg.19 plan ahead of their consideration by cabinets in January 2021.

Policy 6 the Economy (including retail)

| | Hadata an mate 9 to the second of the second | |
|-------------------|--|---|
| | Updates on retail text and policy to | |
| | reflect current growth in locally based | |
| | retailing and promote active travel to | |
| | local facilities. The policy and text now: | |
| | 1. Set out the hierarchy of centres | |
| | across the area; | |
| | Encourage development in all | |
| | centres and, outside defined | |
| | centres, small scale businesses to | |
| | serve local areas, including | |
| | villages; | |
| | Reference the promotion of new | |
| | local centres in the site-specific | |
| | policies for all strategic housing | |
| | developments (over 1,000 | |
| | homes); | |
| | 4. Require a flexible approach in | |
| | centres to allow diversification | |
| | while retaining their role as | |
| | economic and community hubs. | |
| | Please note that DM policies already set | |
| | parameters for development at | |
| | Longwater and the Showground, whilst | |
| | some updates on providing a local centre | |
| | are being considered for the | |
| | Showground site allocation policy. | |
| Policy 7 Strategy | for Areas of Growth | |
| | Updated housing numbers and | To reflect the collation of 2019/20 |
| | proportions of housing growth in this | figures, changes over time and the |
| | area. | sites added or uplifted, reflecting the |
| | | deliverability of the added homes and |
| | | to recognise that the 2018-based |
| | | projections indicate that growth may |
| | | be higher. |
| | Delete reference to the high proportion | In response to consultation |
| 7.1 The Norwich | of retail floorspace in the area currently | comments. |
| urban area | being in the city centre – draft plan | |
| including the | figures now out-of-date and updates not | |
| fringe parishes | available. | |
| | Text and policy changes to refer to: | In response to consultation comments |
| | | from Historic England, Natural |
| | conserving and enhancing the | England and further internal review of |
| | historic environment, design in | policies. |
| | the city centre (removing the | |
| | reference to landmark buildings | |
| | at gateways) and to clarify the | |
| | | 1 |

| | requirement for riverside development to achieve long- term strategic aims; • retention of the leisure area and late-night activity zone; • national changes to the Use Class Order; • protection of Carrow Abbey CWS in the East Norwich proposals; • Development at Norwich Research Park and Easton & Honingham employment areas addressing transport and infrastructure impacts. Change Map 9 showing strategic growth areas to correct error. | In response to the further internal review of the plan. |
|----------------|--|---|
| | Other policy changes to housing numbers at sites, growth locations and overall to reflect: 1. Updated commitment 2019/20; 2. Added sites at the CC15 Norwich Mail Centre at Thorpe Road (+150) and CC13 the car park site at Lower Clarence Road (+45), Norwich, CC2 Ber Street (+20), GNLP0159R Beech Avenue, Taverham (+12) 3. Deleted sites at R35 Havers Road (-80), GNLP2159 – Ber Street (-150), and a reduction in site size R31 Waterworks Road (-90). | As above, to reflect the collation of 2019/20 figures, changes over time and the sites added or uplifted. |
| | Additional homes to reflect 2018-based homes to reflect 2018-based homes how with the control of | • • |
| | Updates on numbers to reflect windfall permissions in 19/20. Long Stratton – no changes | To reflect the collation of 2019/20 figures. |
| 7.2 Main towns | Aylsham – a reasonable alternative site for 250 homes off the Norwich Road, including specialist retirement homes, has been added. | To reflect the commitment to a |
| | Diss – amended text states the housing requirement for new allocations remains | To reflect the commitment to a Neighbourhood Plan to include some |

| | at 400. The key Frontier site neighbouring the railway station (for 200 homes) will be allocated through the GNLP and the remaining 200 homes will be allocated through sites in the Diss and District Neighbourhood Plan. Wymondham • Delete the 1,000-home contingency; • uplift numbers on Johnson's Farm site from 50 to 100 homes. Harleston | of the site allocations for Diss in accordance with the strategic direction from the GNLP. Additional homes to reflect deliverability of added homes and to recognise that the 2018-based projections indicate that growth may be higher (see above). |
|---|--|--|
| | 150 homes uplift on site in the south-east of Harleston (mainly homes for the elderly). | |
| 7.3 Key service centres | Updates on numbers to reflect updated commitment in 19/20. 140 additional homes on a site extension on the west side of Acle providing a link road (total 320). | |
| | Addition of 40 homes on a revised site in Chedgrave (total 60). | |
| 7.4 Village clusters | Updates on numbers to reflect updated commitment in 19/20 and to reflect: • changed site in Lingwood; • deletion of small site in Honingham; • expansion of preferred site to add 20 homes in Horsham St. Faith (total 50). | To reflect the collation of 2019/20 figures and in response to consultation comments. |
| | Inclusion of employment allocation extension at Horsham St. Faith. | In response to consultation comments. |
| | Include policy reference to the potential for some expansion of existing small and medium sized employment sites within settlement boundaries. | |
| 7.5 Small scale windfall housing development | Change to the policy and inclusion of an appendix to allow development of up to 5 homes on small sites in the plan period in larger parishes. The definition of "larger" is based on the number of homes in a parish in 2020. The limit has | To better reflect the greater range of services available in larger parishes, support village life and allow more opportunities for small-scale builders. The presentation of the policy has |
| | been kept at 3 homes in smaller | been amended to a criteria-based |

| | parishes. The parishes in the two | format to make it more legible now |
|----------------|---|---|
| | categories are listed in a new appendix 7. | that it includes greater complexity. |
| | The policy has also been revised slightly in terms of its presentation. | |
| | A policy and supporting text has been | To reflect the key role that new |
| New policy 7.6 | included which commits to one or more | settlements will play in meeting |
| on New | new settlements being brought forward | growth needs in the next plan and to |
| Settlements | through the next plan. | enable work to start on this in tandem with the GNLP plan-making process. |

Evidence

- 18. A consequence of the shortened timetable for producing the Reg 19 GNLP has been the challenge of updating the relevant studies that comprise the plan's evidence base.
- 19. There are two supporting documents that have to be produced with the local plan: a Sustainability Appraisal (that assesses potential social, economic and environmental impacts) and Habitat Regulations Assessment (on potential impacts on European wildlife sites). These are progressed in tandem with the local plan and are used to inform decisions on the local plan and whether it is appropriate, and as such are key components of the plan's evidence base.
- 20. Work on other evidence studies (eg Water Cycle Study, Viability Assessment, Strategic Flood-Risk Assessment) is also progressing. Initial work on these documents has fed into previous stages of the plan and in formulating the draft Regulation 19 plan.
- 21. An interim Viability report is due for completion by early December, drafts of the SA and HRA reports are expected from the consultants in mid-December; and drafts of the other evidence studies are also expected to be available for the cabinets, though there is the possibility that they will not be fully completed by then. It is expected that the documents will be at a sufficient stage for cabinets to approve the Regulation 19 plan for publication. It would be prudent to have a proviso that this is subject to any subsequently received reports / studies not raising major issues that would require significant changes to be made to the draft plan. A decision on such a situation could be delegated to Directors.
- 22. Ultimately, the decision on whether the plan is sound and should be submitted to the Secretary of State will be made by the councils in summer 2021 having regard to the full evidence base and representations received on the Regulation 19 Plan.

23

Conclusions

- 23. The Regulation 19 GNLP strategy develops the strong draft plan we have produced through three previous consultations. Updates to the broad evidence base have been made and this broad evidence base can be further supplemented prior to submission to aid the Inspector at examination, in particular to take account of rapidly changing economic circumstances.
- 24. The GNDP recommendation that the councils should progress the GNLP to the Regulation 19 stage in early 2021 will allow us to implement the clear government guidance to progress plan-making.

Appendix 2

Schedule of Changes to GNLP strategy v 1.4 to v 1.5

This schedule sets out proposed changes to the GNLP Strategy resulting from discussions at the Greater Norwich Development Partnership on December 7th. V. 1.5 of the GNLP strategy is also available on the GNDP web site.

| Issue | Policy/Para in v1.5 | Reason for change | Revised text (revised text in red) for v1.5 | |
|-----------------------------------|---------------------|---|--|--|
| Section 1 Introduction | | | | |
| South Norfolk Villages Plan | Paras. 30 to 32 | To better explain the reasons for the production of the South Norfolk villages plan and to update on its progress | 30. The Draft GNLP promotes housing choice and supports economic activity within the rural parishes that surround market towns and key service centres. It also aims to provide a greater degree of opportunity for smaller builders to develop with their local supply chains and bespoke designs. Such development helps address rural housing need and demand and supports and sustains local services and facilities in the rural area, such as village schools, community venues, shops, pubs and bus services. Recently, the effects of the Covid-19 pandemic have strengthened the shift to 'working from home' and reduced the need to travel frequently to central locations to work. The wider availability of faster and more reliable broadband has resulted in a change in the desirability of more rural properties in village locations. 31. South Norfolk has twice as many parishes as neighbouring Broadland, more market town catchments (including around Beccles and Bungay in Suffolk), significantly less urban fringe, and a substantially larger rural territory. Rural South Norfolk includes two key strategic employment areas, at Hethel and Wymondham, and has a number of villages associated with the Cambridge Norwich Tech Corridor. 32. Consequently, South Norfolk Council is preparing a separate and complementary village clusters plan covering sites for small-scale housing in the rural parishes of South Norfolk that collectively form primary school clusters. The Broadland village clusters form part of this Greater Norwich Local Plan. The aim is to progress the South Norfolk Village Clusters Housing Allocations Local Plan as quickly as possible, with an aspiration for every village cluster to have new housing sites allocated with a focus on smaller sites, and be in accordance with | |

| Section 2 Great Cambridge Norwich Tech Corridor | er Norwich Profi Map 1, after para. 71 | To provide an updated map from the Cambridge | the overarching GNLP strategy which identifies sites for a minimum of 1,200 additional homes (on top of the existing commitment of 1,392 homes). Therefore, it is not one of the objectives of the GNLP to identify the village clusters in South Norfolk and consequential housing allocation sites in these areas. See revised map below this table. |
|--|--|---|---|
| | | Norwich Tech | |
| | | Corridor team | |
| Policy 1 The Str | ategy | | |
| Housing numbers and buffer Policy 2 Sustain | Revisions to table 6 (after para. 178) | To amend commitment figures to include allocations for 250 homes being in the Diss and district Neighbourhood Plan and to add reference to the 22% housing buffer in the plan for clarity | Row D - These are the homes to be provided on new sites allocated through the GNLP (9,254), the South Norfolk Village Clusters Housing Sites Allocation Plan (1,200) and the Diss and area Neighbourhood Plan (250). (Consequential amendments have also been made in paras. 180 and 353 on the housing figures for Diss and in the Sites document to allocate the Frontier Site adjacent to the railway station for 150 homes through the GNLP). Row G - This provides a buffer of 22% to cater for the potential for higher growth rates. |
| Policy 2 Sustain | able Communiti | es | |
| Hydrogen | Table 8 Key Issues addressed by policy 2 (New technologies section) – after para. 199 | To include a reference to the potential for hydrogen powered vehicles | The policy also provides the basis for more detailed supplementary planning documents for measures to support new technologies in times of rapid change, including the use of electric and possibly hydrogen vehicles. |
| Policy 3 Enviror | mental Protecti | on and Enhancemen | nt |
| Green Infrastructure Corridors (GI) | Insert a map of the GI corridors for the Norwich urban area (Map 8B) | To complement the existing Greater Norwich wide GI map by providing clarity on the extent of | See the new map below this table. Map 8A is the existing map showing Green infrastructure covering the whole Greater Norwich area and Map 8B focuses on the Norwich Urban Area in more detail. Amended references have been made to the GI maps accordingly. |

| | | the GI corridors within the Norwich urban area. The scale of the current mapping makes this difficult to see. | |
|---|---|---|--|
| Policy 4 Infras | tructure | | |
| Hydrogen | Para. 243 | To include a further reference to the potential for hydrogen powered vehicles | 243. Policy 4 recognises that Greater Norwich is a mixed urban and rural area in which travel and access issues vary, with the use of the private car being particularly important to the rural economy. It is anticipated that the shift to electric and possibly hydrogen vehicles will assist in reducing emissions in rural areas. |
| Policy 5 Home | es | | |
| Affordable Housing on brownfield sites | Additional text in para. 270 Additional clause in policy 5 | Amended to reflect updated viability evidence and to advice in national planning practice guidance | 270. The most recent viability study findings which conclude that centrally located brownfield sites which have higher development costs which affect viability are generally able to provide 28% affordable housing. As national planning guidance makes it clear that where applicants can demonstrate particular circumstances that justify the need for a viability assessment at the planning application stage, the policy provides some flexibility on this point for brownfield sites where exceptional costs are more likely. In addition, the introduction by the government of Vacant Building Credit enables existing vacant floorspace on a site to be discounted in order to lower the affordable housing requirement, with aim of incentivising development on brownfield sites; Major residential development proposals and purposebuilt student accommodation will provide: at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28%, unless the site is allocated in a Neighbourhood Plan for a different percentage of affordable housing, or for brownfield sites where the applicant can demonstrate that particular circumstances justify the need for a viability assessment at decision-making stage; |

Policy 6 – the Economy

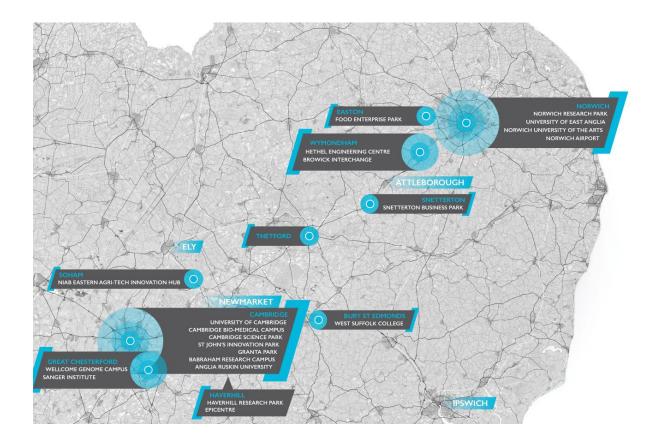
Updates to take account of recent evidence will be sent out prior to the GNDP meeting and discussed on December 16th

Policy 7 Growth areas

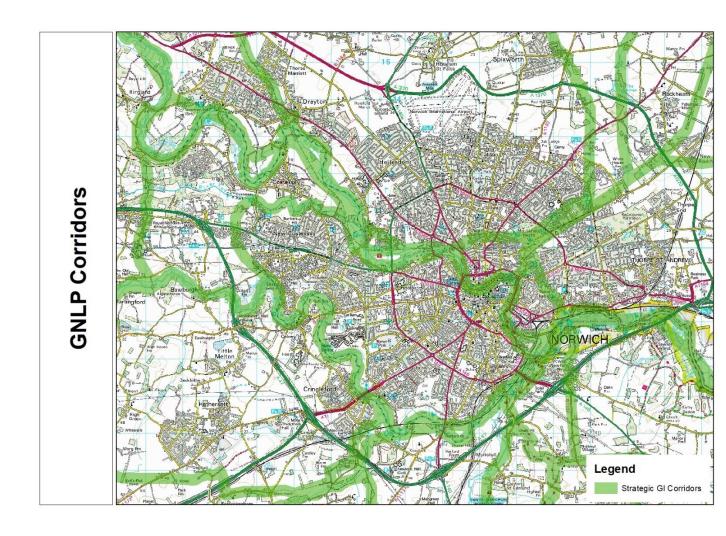
| rolley / Glowti | _ | | |
|------------------------------------|--|--|---|
| East Norwich masterplan | Para. 328 | To update on progress on the East Norwich masterplan | 328. To ensure growth is co-ordinated, overcomes local constraints and is well-designed in a sensitive location in and adjacent to the Broads Authority area, the policy requires regeneration to be guided by an areawide masterplan supplementary planning document. The masterplan will be produced by consultants, with support from the site landowners and other partners in the East Norwich Partnership (a new public sector led partnership led by the city council) including Homes England and Network Rail. Funding is available, including external funding from the Towns Fund, to progress the masterplan and other measures so that the masterplan's findings can inform this strategy and other possible blockages to progress can be addressed. |
| Strategic Gaps | Paras. 364 and 370 | To provide more detail on the strategic gap between Wymondham and Hethersett | 364. The strategic gaps identified through this plan and other policies in the development plan aim to prevent coalescence of Wymondham and Hethersett. The gap between the two settlements is focussed on Kett's Oak. 370. Strategic gaps identified through this plan and detailed in development management policies between Wymondham and Hethersett, focussed on Kett's Oak, and Hethersett and Cringleford, aim to prevent the settlements joining up. |
| Appendix 2 Glo | ssary | | |
| Hydrogen | Addition to renewable energy definition in glossary | To include a reference to the potential for hydrogen power as a form of renewable energy | Renewable energy Energy generated from sources which are non-finite or can be replenished. Includes solar power, wind energy, power generated from waste, biomass, hydrogen etc. |
| | erseded Policies | | |
| Superseded Policies appendix | Delete reference to the need for an additional appendix on superseded policies | As the introductory section (paras. 22 to 26) and appendix 4 already | Reference to appendix 8 deleted. |

| | adequately cover | |
|--|------------------|--|
| | this issue. | |

Revised map 1



Map 8B Green Infrastructure Corridors in the Norwich Urban Area



Schedule of Changes to GNLP strategy v 1.5 to v 1.6

This schedule sets out proposed further changes to the GNLP Strategy from version 1.5, which was placed on the GNDP website on December 10th, to version 1.6. These further changes will be considered at the GNDP on December 16th 2020. As well as this schedule of changes, version 1.6 of the GNLP Strategy itself which includes the changes below is also available on the GNDP web site.

| Issue | Policy/Para in v1.6 | Reason for change | Revised text (in red) for v1.6 |
|--|----------------------|---|---|
| Section 1 Intro | l . | , | |
| South Norfolk Villages Plan | Para. 33 | To better explain the reasons for the production of the South Norfolk villages plan and to update on its progress | South Norfolk District Council is at an advanced stage with its Village Clusters Housing Allocations Local Plan. The Regulation 18 preferred options consultation is anticipated in Spring 2021. There is an aspiration for every village cluster to have new housing sites allocated, with a focus on smaller sites, and to be in accordance with the overarching GNLP strategy which identifies sites for a minimum of 1,200 additional homes on top of the existing commitment of 1,392 homes. Therefore, it is not one of the objectives of the GNLP to identify the village clusters in South Norfolk and consequential housing allocation sites in these areas. |
| Section 2 Spat | tial Portrait | | |
| Housing need evidence | Para. 59 | To clarify text on general housing and affordable housing needs | Local evidence identifies that 28% of the housing required from 2015 to 2038 should be affordable housing. It also shows that the mix of housing tenures required differs by the type of home as illustrated in the graph below. The highest requirement for general market housing is for three bed homes. Affordable housing needs can be different. The most up to date breakdown of affordable housing need across the three districts will be determined by the individual local authorities when planning applications are being considered. |
| Policy 1 The S | trategy | | |
| Housing numbers in Broadland Villages | Revision to policy 1 | in the Broadland Vi now available. | er reference to allocations to provide "up to" 482 new homes illage as the actual number of houses allocated in this area is |

| Modern construction techniques | Table 8 (Row 2) on technology changes and policy 2 bullet on the same issue | Add references to modern construction techniques | Table 8 row 2 - The policy also provides the basis for more detailed supplementary planning documents for measures to support new technologies in times of rapid change, including modern construction techniques and the use of electric and possibly hydrogen vehicles. Policy 2 Bullet 2 Make provision for delivery of new and changing technologies (including broadband, fibre optic networks, telecommunications, construction methods and electric vehicles); |
|---------------------------------------|---|---|--|
| Policy 4 Infrast | tructure | | |
| Health Care Facilities | Para. 265 | To update reference to ongoing work on assessing health care needs. | A full estate strategy is being developed which will impact on the infrastructure requirements from the HIDP included in this plan. Therefore, only currently identified issues are included this strategy. Updated information will be provided in the trust's completed strategy. This will be included in the GNLP. |
| Policy 5 Home | S | | |
| Affordable Housing Needs | Additional text in para. 270 | Amended to reflect the intention to further update evidence on affordable housing need to assist the inspector. | Current evidence shows a higher social rented requirement in the city with a wider range of tenure options suitable in Broadland and South Norfolk. This evidence will be revisited before submission. |
| Affordable housing requirements | Policy 5 – bullet on affordable housing | To provide greater clarity on affordable housing policy | Major residential development proposals and purpose-built student accommodation will provide: • at least 33% affordable housing on-site across the plan area, except in Norwich City Centre where the requirement is at least 28%, or where a) the site is allocated in a Neighbourhood Plan for a different percentage of affordable housing, or b) for brownfield sites where the applicant can demonstrate that particular circumstances justify the need for a viability assessment at decision-making stage; |

Centres Study

| Economic | I Indotes to | To rofloct receipt | Dara 200 Evidence in the Employment Taxon Contra |
|----------------------|---|---|---|
| Economic Evidence | Updates to various aspects of the supporting text | To reflect receipt of the Greater Norwich Employment Land addendum commissioned to take account of recent changes in relation to the economy. | Para. 289 Evidence in the Employment, Town Centre and Retail study (GVA 2017), updated in the Greater Norwich Employment Land addendum: Avison Young: 2020, investigated both "business as usual" and the potential for enhanced economic growth. It demonstrates that committed employment land is more than sufficient in quantity and quality to meet the potential for enhanced growth. The Avison Young addendum forecasts growth of around 33,000 jobs in the period 2020 to 2038. While the plan provides for significantly more employment land than is required for this scale of jobs growth, there are a range of justifying factors: |
| | | | a. Over 280 hectares of our supply is on key strategic sites, with several targeted at particular sectors such as NRP, Hethel and the airport area. These sites are not suitable for reallocation to other uses. b. The remainder is dispersed across the area providing important local opportunities. The evidence focusses on B-class uses (as defined pre-2020) and employment land will also be used for non-B-class employment such as gyms, waste recycling centres, vehicle sales and fuel forecourts; or supporting uses such as cafés and restaurants. c. The scale and range of our employment allocations facilitates choice and flexibility, provides for growth in the longer term and supports more ambitious levels of jobs growth if demand can be stimulated. |
| | | | Para. 291 The policies of this plan seek to grow the local economy in a sustainable way to support jobs and inclusive economic growth in both urban and rural locations. This will: • provide jobs and services for a rising population and develop Greater Norwich's role as an engine of the regional economy; • facilitate enhanced growth potential with a target of at least 33,000 additional jobs in the period 2020-2038; New para. 292 Policy 2 promotes the provision of enhanced broadband throughout the area and this will support businesses directly and support home working. Implementation of the policy will also see employment development contribute to the green infrastructure network as appropriate. |

| | | | Para. 294 Although the Employment Town Centre and Retail study (GVA 2017) and the Avison Young 2020 addendum conclude that Greater Norwich has enough employment land overall, most of this is out-of-centre and is neither the preferred location for some growth sectors nor the most sustainable place for high intensity employment / office growth. |
|-----------------|----------|--|--|
| | | | Additional sentence at the end of para. 295 Extensions to other small sites will also be considered where this can be justified, for example where the site is well located to serve local needs and has insufficient capacity to serve ongoing demand. |
| | | | Additions to para. 296 Retailing and town centres are currently in a state of flux. Covid-19 has strengthened the growth of internet shopping. This uncertainty reinforces the need to protect and promote town centres to allow them to recover and evolve. There is some evidence that the Covid-19 epidemic has encouraged people to shop locally and boosted the opportunities for smaller businesses and in market towns, and smaller centres. |
| | | | New para. 298 Retail, offices and some leisure uses are currently the same use-class and this helps provide flexibility within town centres. However, large scale out of centre office, retail or leisure development will have very different implications, for example for traffic generation, and it will be important to ensure through conditions that the development that takes place is consistent with the evidence provided with the planning application. |
| P | Policy 6 | Correction of site size | a site of around 35ha at the A140/Broadland Northway junction and focussed on uses benefiting from an airport location |
| | | To provide further detail on the role of the Food Enterprise Park site | The Food Enterprise Park at Easton/Honingham supporting the agri-food sector |
| | | To provide clarification on the policy requirement | The development of new retailing, leisure, offices and other main town centre uses will be subject to the sequential approach and out-of-centre impact assessment, as defined by Government policy and guidance Development and investment consistent in scale with the function of the centre are encouraged at all levels of the hierarchy to enhance the range of businesses and facilities available locally. |
| Policy 7 Growth | areas | | |

| East Norwich masterplan | Paras. 332- 3 | To provide greater clarity on the progress of the East Norwich masterplan | Part of 332. It has the potential in the long-term to create a new sustainable urban quarter for Norwich, to act as a catalyst for additional regeneration in neighbouring urban areas and to contribute significantly to growth of the Greater Norwich economy. |
|--|------------------|---|---|
| | | | 333. To ensure growth is co-ordinated, overcomes local constraints and is well-designed in a sensitive location in and adjacent to the Broads Authority area, the policy requires regeneration to be guided by an area-wide masterplan supplementary planning document. The masterplan will be produced by consultants, with procurement being well advanced. Funding is being provided from the site landowners and other partners in the East Norwich Partnership (a new public sector led partnership led by the city council) including Homes England and Network Rail. Significant additional funding has recently been secured from the Towns Fund to progress the masterplan and acquire land in order to maximise the chances of successful delivery. It is expected that the masterplan's findings will inform implementation of this strategy and ensure that possible blockages to delivery can be overcome. |
| Small scale windfall housing development | Policy 7.5 | Clarification of policy requirement | Small scale residential development will be permitted adjacent to a development boundary or on sites within or adjacent to a recognisable group of dwellings |
| Appendix 1 In | frastructure | l | |
| Broadband | Update appe | ndix | Broadband section: aim to make high-speed broadband available to more than 95% of Norfolk's premises, with further work planned. |
| Health Care | _ | | Primary Care: |
| Facilities | | | There are currently 2 potential options to increase capacity as required around the north and north-west of Norwich: 1. New build at Broadland Hub within or close to planned developments at Rackheath and Beeston Park. 2. No new build, increased numbers spread amongst existing practices. |
| | | | The selected option(s) will be confirmed throughout 2021- 22, following demand and capacity reviews and Primary Care estate strategy development. |

Hospitals:

There is one acute hospital, the Norfolk and Norwich University Hospital NHS Foundation Trust (NNUH). Other services are delivered from several other locations throughout the Greater Norwich area.

The NHS Long Term Plan and the STP Operating Plan will identify and address building capacity and infrastructure investment requirements, various facilities all other constraints faced by the STP/ICS.

The NNUH estates strategy will be updated throughout 2021, in line with STP/ICS plans

Community Care:

These are provided by Norfolk Community Health and Care NHS Trust at community hospital sites and health centres across the Greater Norwich area and include:

- Inpatient specialist rehabilitation services;
- Clinic services for outpatients;
- Community nursing in patients' homes.

The NHS Long Term Plan and the STP Operating Plan will identify and address building capacity, infrastructure investment requirements, various facilities and all other constraints faced by the STP/ICS.

In line with the shift to care in the community, the community health trust is expected to shift services to wrap around primary care networks. The Community Trust estate strategy will be refreshed throughout 2021, in line with STP/ICS plans.

Appendix 2 Glossary

| Building for a | Update | To update | Building for a Healthy Life |
|----------------|--------------|-------------------|--|
| Healthy Life | reference in | reference to | A government-endorsed industry standard for well- |
| | glossary | revised national | designed homes and neighbourhoods. Local communities, |
| | | guidance | local authorities and developers are encouraged to use it to |
| | | | guide discussions about creating good places to live. The |
| | | | National Planning Policy Framework encourages its use in |
| | | | local plans. |
| Clean Growth | | To update to | Clean Growth |
| | | clarify the | Clean growth means growing our income while cutting |
| | | definition and to | greenhouse gas emissions. It is promoted nationally by the |
| | | reference the | government's Clean Growth Strategy and locally in the |
| | | national and | emerging Local Industrial Strategy. |
| | | regional | |

| strategies on clean growth. | |
|-----------------------------|--|
| | |

| Greater Norwich Development Partnership (GNDP) | | |
|--|---|--|
| Report title | Greater Norwich Local Plan Regulation 19 Stage – Publication of the Pre-submission Draft Sites document for representations on soundness and legal compliance | |
| Date | 16 th December 2020 | |

Recommendation

That the Board:

- Recommends to the councils that they should agree to publish the Regulation 19
 Pre-submission Draft Greater Norwich Local Plan Sites document linked from this
 report for representations on soundness and legal compliance;
- Delegates authority to directors to make changes agreed today, plus other minor changes to the document and its background evidence, prior to it being reported to councils in January.

Introduction

- 1. This report covers the Greater Norwich Local Plan (GNLP) Sites document.
- 2. The GNDP agreed on December 7th to recommend to the Greater Norwich councils that the other part of the GNLP, the Strategy, should be published between 1st February and March 15th for representations on its soundness and legal compliance.
- 3. The representations made will assist members in deciding whether to submit the GNLP for examination in summer this year and the government appointed Planning Inspector to decide on the content of the examination.
- 4. The recommendations for this report request that the councils also publish the Sites document for representations on its soundness and legal compliance and delegate authority to directors to make any changes to the Sites document which are agreed today, along with any further minor changes required.
- 5. As the Sites document and its supporting evidence are too large to append to this report, the documents are available on the GNDP web site here.

The Sites document

- 6. The Sites document contains allocations for the sites to deliver the GNLP Strategy, including undeveloped allocations carried forward from the Broadland, Norwich and South Norfolk Local Plans. The Sites document does not replace existing allocations in adopted Area Action Plans for Long Stratton, Wymondham and the Growth Triangle (NEGT) or Neighbourhood Plans, though in some cases additional allocations are made through the document in these areas.
- 7. The document identifies and allocates strategic housing and mixed-use sites as well as strategic sites for employment. Other allocations provide housing sites and sites for other uses (including employment, recreation, open space and community uses) to meet the strategic needs set out in the GNLP Strategy, without being strategic in themselves.
- 8. The document is divided into settlement chapters organised according to the settlement hierarchy by:
 - Norwich and the fringe parishes;
 - Main towns;
 - Key service centres;
 - Broadland village clusters;
 - Non-residential allocations in South Norfolk.
- 9. Maps and site policies are included for all of the allocated sites.
- 10. The policies cover site-specific requirements to address constraints and to make the best of local opportunities. Depending on the site size and location, this includes a range of issues such as access, infrastructure (including green infrastructure), local facilities, environmental protection and enhancement, design, master planning and landscaping.
- 11. The document does not contain any residential sites in smaller South Norfolk villages as South Norfolk Council are preparing a separate village clusters plan covering new and carried forward sites for housing in their village clusters. The GNLP has considered non-residential sites in South Norfolk villages.
- 12. A contingency site for 800 homes at Costessey is carried forward from the Regulation 18C draft plan and is included in the Sites document. The contingency policy identifies a "trigger" measure which will allow the site to become an allocation if it is required to ensure that housing needs are met through the plan.
- 13. The plan allows for a limited amount of retailing at the Norfolk Showground to support its viability.

14. As this is a strategic plan sites of less than 0.5 hectares and those proposed as settlement boundary extensions have not been included.

Supporting evidence

- 15. The Sites document is accompanied by supporting evidence as follows:
 - Summaries of consultation comments with the draft GNLP responses and proposed changes to the plan (grouped by settlement hierarchy);
 - Example site assessment booklets for Acle, Aylsham, Horsham St Faith and Sprowston. These set out the site selection process by settlement. The remainder of the site assessment booklets will be ready later in December to send out with the Cabinet Papers.
 - Tables of allocated sites with reasons for allocation and tables of unallocated sites with reasons for rejection (grouped by settlement hierarchy). These tables will form the appendix referred to at the end of the site assessment booklet examples.

Conclusion

16. The Sites document complements and supports the GNLP Strategy. In providing site allocations to promote the right type of development in the right places, it will allow the GNLP to support economic recovery and sustainable growth.