

Greater Norwich Development Partnership

Date: Friday 23 June 2017

Time: 9.00 am

Venue: Council Chamber, Broadland District Council

Board Members:

Broadland District Council:

Cllr Ian Moncur

Cllr Andrew Proctor

Cllr Shaun Vincent

Norwich City Council:

Cllr Bert Bremner

Cllr Mike Stonard

Cllr Alan Waters

South Norfolk Council:

Cllr Colin Foulger

Cllr John Fuller

Cllr Lee Hornby

Norfolk County Council:

Cllr Stuart Clancy

Cllr Tim East

Cllr Martin Wilby

Broads Authority:

Sir Peter Dixon

Officers:

Phil Kirby

Phil Courtier

David Moorcroft

Graham Nelson

Tim Horspole

Tom McCabe

Vincent Muspratt

Andrea Long



NORWICH
City Council



Norfolk County Council



Broads Authority
The Broads - a member of the
National Park family

AGENDA

Page No

1. To receive Declarations of Interest

2. Apologies for Absence

3. [Minutes of the meeting held on 23 March 2017](#)

3 – 7

4. Matters arising therefrom (if any)

5. Questions

To consider any questions received from members of the public in accordance with the Board's Terms of Reference.

6. [Greater Norwich Local Plan: Housing Numbers](#)

8 – 18

To consider the provisional figures for the number of homes to be allocated in the Greater Norwich Local Plan.

7. [Greater Norwich Local Plan: Developing Growth Strategy Options](#)

19 – 45

To consider the emerging approaches for developing a range of reasonable growth options for the Greater Norwich Local Plan.

FOR FURTHER INFORMATION PLEASE CONTACT:

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Greater Norwich Development Partnership Board Meeting Minutes

Date: Thursday 23 March 2017

Time: 3.30 pm

Venue: Council Chamber, Broadland District Council, Thorpe Lodge, 1 Yarmouth Road, Norwich, NR7 0DU

Board Members:

Broadland District Council:

Cllr Ian Moncur, Cllr Andrew Proctor, Cllr Shaun Vincent (Chairman)

Norwich City Council:

Cllr Mike Stonard, Cllr Alan Waters

South Norfolk Council:

Cllr Colin Foulger, Cllr John Fuller, Cllr Lee Hornby

Norfolk County Council:

Cllr Tim East

Broads Authority

Cllr Paul Rice

Officers in attendance: Amy Broadhead, Mike Burrell, Phil Courtier, Richard Doleman, Angela Freeman, Ellen Goodwin, Tim Horspole, Andrea Long, Dave Moorcroft, Phil Morris, Vince Muspratt, Graham Nelson.

1. DECLARATIONS OF INTEREST

The Chairman advised the meeting that through his consultancy Abzag, he was promoting, on behalf of the landowner, a site for residential development in Colney through the Greater Norwich Local Plan. When this site was under consideration he would declare a disclosable pecuniary interest and shall vacate the chair and leave the room.

In the interests of transparency, he also brought to the Board's attention, that his father, Malcolm Vincent, through his company Vincent Howes, was promoting, on behalf of the landowners, a site for residential development in Costessey/Bawburgh through the Greater Norwich Local Plan. In this case under the provisions of the Code of Conduct, there was no interest to declare which would prevent him from participating in the debate and chairing the meeting.

He added that he would be declaring the same interests when chairing

Broadland's Place Shaping Panel and when as a Member of Broadland District Council's Cabinet and Council GNLP matters were considered. Cllr John Fuller declared a non-pecuniary interest as a director of an employment site at Seething.

2. APOLOGIES FOR ABSENCE

Apologies were received on behalf of Cllr Bert Bremner, Cllr Stuart Clancy and Cllr Martin Wilby.

3. GREATER NORWICH LOCAL PLAN PROGRESS REPORT

The report provided a progress update on the production of the Greater Norwich Local Plan (GNLP), in particular on emerging evidence, and set out the next steps for plan-making.

The main issues covered in the report were:

- summaries of the current position in relation to a number of evidence studies, which were currently underway;
- progress on the Greater Norwich Housing and Economic Land Availability Assessment (HELAA);
- the next stages of the GNLP, including the implications of the Housing White Paper for plan-making.

The general evidence required to underpin the GNLP was required to include assessments of:

- the scale of housing need across the housing market area;
- economic and employment growth and the future development of the local economy;
- transport infrastructure, including existing improvement plans and further requirements to support growth;
- key infrastructure requirements to support growth, including energy, water supply, wastewater treatment, education and healthcare;
- environmental information, including landscape, ecology and air quality;
- the viability and deliverability of the Local Plan.

Some early-stage viability work had been undertaken, with a workshop held in February 2017 for planning agents, surveyors and housebuilders to discuss some initial results and findings on broad development costs and assumptions.

At the workshop it had become clear that the scale of infrastructure requirements on larger developments, as well as rising labour costs, were a major concern for developers. In particular, there was a reluctance to purchase and build out large housing sites, due to the perception of increased risks and higher costs.

In the face of these concerns it might be necessary to consider 'parcelling out' any larger allocated sites into smaller ones of around 250-300 dwellings, to stimulate the local housing market.

Consideration might also be given to how local planning authorities could influence the early delivery of infrastructure to reduce risk on allocated sites. Advice to support work on the Habitats Regulation Assessment, on internationally protected nature conservation sites, was being provided by the specialist consultancy the Landscape Partnership. Another specialist consultancy, Lepus, was providing advice on the Sustainability Appraisal (SA) process.

The SA Scoping Report, which was the first stage of the SA process and established local criteria for appraising the sustainability of the GNLP, had been approved by the three councils.

It was noted that the SA would give equal weighting to Environmental, Economic and Social factors when being compiled.

A Member advised the meeting that large developments could put pressure on GP's surgeries and noted that local authorities would have the discretion to require surgeries to be delivered with the growth, if thought necessary. However, it was also noted that there was a shortage of healthcare professionals and there would be a risk of building a premises that remained unused. Members were informed that a county wide Health Protocol is being developed for planners and health providers to ensure liaison on health needs associated with growth is effective.

Members were informed that a report in June 2017 would set out the broad strategy for the distribution of housing and employment in Greater Norwich.

RESOLVED

to note progress and agree the next steps for the production of the Greater Norwich Local Plan.

4. QUESTIONS FROM THE PUBLIC

Norwich City Councillor Denise Carlo

How did the GNLP propose to address existing high levels of car travel to, from, around the suburban and urban fringes of Norwich highlighted by its failure to meet Objective 7 target, especially given that the Norwich Northern Distributor Road will open in the near future and encourage further orbital car trips?

Response

The Greater Norwich Local Plan is at its early stages of production. As the Plan is developed work will be carried out looking at the scale and distribution growth to 2036 and the area wide policies that will shape how this should

happen.

As the Plan is at its early stages decisions have not been made on the distribution of growth and consequently its impacts on travel patterns. The work to develop the plan will be supported by a Sustainability Appraisal (SA) that considered the social, economic and environmental impacts of alternatives for the Plan. The scoping for the SA, which set out an assessment framework with 16 themes for consideration, had been agreed.

In relation to the Transport and access to services theme (ref: SA12), the overarching objective was to 'reduce the need to travel and promote the use of sustainable transport modes'. As the Plan is developed alternatives will be assessed against this and the other SA objectives.

The strategic approach taken in the GNLP, along with the continued implementation and planned review of the Norwich Area Transportation Strategy (NATS) will impact on future travel patterns.

The public Regulation 18 consultation on the GNLP, scheduled to begin in October this year, would set out a favoured strategy and reasonable alternatives for housing and employment growth and would be supported by sustainability appraisal.

County Councillor Andrew Boswell

Would the Board make a commitment to bring in appropriate, numerical, measurable, non-legally binding, carbon footprinting, accounting and targets in the GNLP Sustainability Appraisal Scoping Report?

Response

It was accepted that the Greater Norwich Local Plan (GNLP) should seek to address climate change and have policies to minimise the carbon footprint of the area. As agreed at the January 2017 GNLP meeting, the GNLP will include the objective '*to mitigate against and adapt to climate change*'. The adopted Joint Core Strategy (JCS) already did this. The main ways this was done were by promoting a sustainable distribution of development, the use of sustainable transport modes and other measures such as energy and water efficiency, the promotion of a green infrastructure network and flood risk mitigation. However, it was not necessary to establishing a specific numerical target for CO₂ emissions reduction to achieve this.

The SA Scoping Report, which had now been agreed by the councils following consultation, covered this issue in some detail. It includes climate change mitigation and adaptation as a theme. It also has an objective to adapt to and mitigate against climate change. Emerging GNLP policies will be tested through the SA against the criteria "*Will it minimise CO₂ emissions?*" The indicator of "*CO₂ emissions per capita*" will continue to be used, with the target "*to reduce emissions*". The performance of reasonable alternative distributions of growth in terms of road transport emissions was also likely to be assessed

as part of the SA. However, it was not considered that a full numerical carbon assessment, as promoted in the question, was reasonably required as part of the SA of the GNLP because:

- National carbon reduction targets took account of large scale projects to address climate change e.g. decarbonising energy production, promoting energy efficiency within homes and fuel efficiency in vehicles. It was difficult to see how carbon reduction targets could be established locally as the effects of such national measures could not readily be separated from the impacts of local policies. Therefore establishing an effective local target for what could be achieved through the planning system would be problematic;
- The CO2 emissions figures used to monitor the JCS and for the GNLP and its SA, were provided annually for local authority areas by Government. The figures covered transport, domestic and industrial/commercial emissions. The expense of establishing a monitoring regime locally and not using the national figures could be high and would be difficult to justify when high quality data was available for free;
- Specific carbon reduction targets were not required by SA regulations and their use was not advised either by our specialist SA consultants Lepus or supported by the JCS Inspector who stated that such an approach could lead to 'fictitious precision'.

In summary, the SA Scoping Report did have appropriate targets for the overall reduction of per capita carbon emissions rather than establishing specific targets for that reduction so changes to the agreed approach were not proposed.

It was agreed that henceforth Questions from the Public would be the first substantive item on the Agenda.

The meeting closed at 4.06 pm.

**Greater Norwich Local Plan:
Housing Numbers**

23 June 2017

Summary

This paper shows how the provisional figures for the numbers of homes to be allocated in the Greater Norwich Local Plan (GNLP) have been established. It also identifies potential “reasonable alternative” approaches for those housing numbers for use in consultation.

Recommendation

Members are invited to endorse the approach proposed to establishing housing numbers and potential reasonable alternatives to them for use in Regulation 18 consultation on the Greater Norwich Local Plan.

1. Purpose

1.1. This paper shows how the provisional figures for the numbers of homes to be allocated in the Greater Norwich Local Plan (GNLP), the **total housing provision**, have been established. It also identifies potential “reasonable alternative” approaches for use in the Regulation 18 consultation on the plan. This is an important part of identifying the growth strategy options for the plan.

1.2. The figures are provisional because:

- it will be important to take account of representations on the GNLP Regulation 18 consultation;
- the Government has committed to publishing a standard methodology for calculating housing needs, which will be in draft form initially. This methodology could have a significant impact on the total housing provision of the GNLP;
- The housing provision figure, along with the other policies of the GNLP, will be subject to an independent examination before it can be adopted as planning policy.

2. Establishing the total housing provision

2.1. Establishing the provisional figure is a four staged process:

- Stage 1 - identify the **Objectively Assessed Need (OAN)** for housing. This is the amount of housing and the mix, sizes and tenures likely to be needed over the plan period. OAN for Greater Norwich has been established through the Strategic Housing Market Assessment (SHMA) for Central Norfolk, which uses demographic, affordability and economic evidence;
- Stage 2 - establish the local plan’s **housing requirement**. This is the base amount of housing to be delivered through the local plan. The housing requirement is usually the same as OAN, unless there are exceptional reasons, which are usually local social, economic or environmental circumstances, which justify a different requirement;

- Stage 3 - establish a **housing delivery buffer**. This is the amount of additional housing needed to provide reasonable certainty that the housing requirement can be met. Paragraph 4 of the National Planning Policy Framework (NPPF) states that *“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change”*. In practical terms this means allocating land for a greater number of homes than identified in the housing requirement. There is no clear guidance as to how large a delivery buffer should be. It is however reasonable to expect that in areas that have historically under-delivered against housing requirements that the buffer would be larger than in areas that have met their targets;
- Stage 4 - the **total housing provision** is the housing requirement and the delivery buffer added together.

Table 1 below applies the four staged approach to the GNLP:

Stage	Figure	Justification
1 – OAN 2015 to 2036	39,486 ¹ or 1,880 per year	<ol style="list-style-type: none"> 1. This OAN figure includes an uplift of 3,133 dwellings, above demographically derived need, to address “market signals”. Uplifts are not cumulative so this also addresses part of the increased demand for housing that would be generated if the City Deal jobs targets can be met. The total City Deal job uplift equates to 8,361 homes so the OAN includes about 37% of this. 2. The exclusion of the whole housing response to the City Deal from the calculation of the OAN in the April 2017 SHMA is a change from the approach taken in the January 2016 SHMA. 3. The change recognises that the City Deal is a local policy decision (i.e. a “policy on” matter) not an assessment of the likely change in job numbers based on past trends and/or economic forecasts (i.e. a “policy off” matter).
2 – Housing requirement	39,486	Whilst the GNLP is at an early stage of plan making, to date no constraints have been identified to indicate that the full OAN cannot be met. Thus the GNLP housing requirement and the OAN are the same.
3- Delivery Buffer	At least 20%	<ol style="list-style-type: none"> 1. All parts of the current development plan include some form of delivery buffer. Whilst the scale of this varies, the buffer generally approaches or exceeds 20% of the plan requirement. This is therefore considered to be a reasonable minimum buffer (see appendix B for further detail); 2. Given local housing delivery issues, there should be consideration of a higher buffer to further minimise risks of under-delivery. Where evidence is available of likely delivery, forecast windfall development can assist in providing a higher delivery buffer. 3. This approach is in line with the requirements of the National

¹ Source The Central Norfolk Strategic Housing Market Assessment (SHMA), April 2017

		Planning Policy Framework (NPPF) and recent recommendations from the Local Plan Expert Group (LPEG).
Stage 4 – Proposed new allocations	8,900	<ol style="list-style-type: none"> 1. The detailed calculation methodology for the proposed new allocations along with the total housing provision and estimated windfall delivery are set out in appendix A. 2. The proposed new allocations figure is 8,900 homes. This provides a delivery buffer of 23% and more than covers the remaining City Deal requirement. 3. This methodology uses the housing response to the City Deal as part of the housing delivery buffer. 4. This approach does not take account of forecast windfall housing completions (different approaches to the use of windfall are explained in the alternatives section below) which provides an additional delivery buffer.

3 Alternative approaches

3.1 As set out above, there is no alternative to the SHMA estimate of OAN, as it is the most up-to-date and credible evidence available. However, there are three choices in other parts of the methodology which are potentially “reasonable alternatives” which could form the basis for consultation questions. These are in table 2 below:

Potential “Reasonable Alternatives”	Considerations
Is there any reason that the GNLP housing requirement should be less than the OAN?	As stated in table 1, there is not currently any evidence for this.
Should the full housing response to the City Deal specifically be planned for?	<ul style="list-style-type: none"> • Specifically planning for the whole of the housing response to the City Deal, i.e. allocating sites to meet its full requirement and then adding a buffer on top, rather than using it as part of the housing delivery buffer, would have a logical fit with economic aspirations in the City Deal. To do so, however, would result in a significant uplift in the proposed new allocations and in the total housing provision for the GNLP. • The drawback with this approach is that if aspirational City Deal related jobs uplift does not occur, then there will not be a corresponding increase in housing demand. • Planning for total housing provision significantly above OAN would require a markedly different strategy, either increasing development levels in chosen locations or selecting new locations for significant growth. If the need for this level of housing did not materialise then there would be no certainty that the market would choose to

	<p>deliver the most appropriate sites from a planning perspective. There would also be issues related to medium and long term infrastructure planning if there were less certainty about the sites that would be developed.</p> <ul style="list-style-type: none"> • In conclusion, the disadvantages associated with providing for the full housing response to the City Deal are considered to outweigh the benefits.
<p>Should the proposed new allocations be discounted to take account of projected windfall housing completions?</p>	<ul style="list-style-type: none"> • Discounting the housing allocation requirement to take account of projected windfall would significantly reduce the amount of land that needs to be allocated². • Using the housing response to the City Deal to form part of the delivery buffer is entirely justified. However, if windfall was used to discount the proposed new allocations, the plan would not be positively planning for any of the housing needed to support City Deals jobs growth. Failure to plan positively for the housing response to the City Deal would be inconsistent with the Greater Norwich authorities' economic ambitions, and may constrain their achievement. • Windfall projections included in the appendix A are based on recent trends, with some discounting. Whilst this is justifiable over the short/medium term, further consideration will need to be given as to whether it is justifiable to project in the same manner across the whole of the GNLP period to 2036. Therefore the level that the housing allocation requirement could justifiably be discounted under this alternative may be less than identified in the methodology. • Because this option would not be fully consistent with the economic ambitions of the area that it would not be preferable to the proposed methodology.

4 Conclusions

4.1 The **OAN** for Greater Norwich and the **Housing Requirement** for the plan are the same at **39,486**.

4.2 National policy, local experience and the recommendations of the LPEG suggest that a **delivery buffer** of at least **20%** should be applied to the housing requirement.

² An allowance can be made for windfall where there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.

- 4.3 Given that delivery of housing has been below targets in recent years, the approach set out in Appendix A, which provides a minimum buffer of **23%** above OAN, is considered appropriate. This figure could rise to **37%** above OAN if anticipated levels of windfall development are delivered. This approach creates the best balance between planning to meet OAN and economic growth aspirations, whilst minimising the release of excessive greenfield land for development. This methodology should be used as the basis of the development distribution alternatives in the GNLP Regulation 18 consultation.
- 4.4 The above conclusions will need to be revisited in light of the forthcoming standard methodology for the calculation of housing need and representations submitted in response to the GNLP Regulation 18 consultation.

Appendix A - Housing numbers for the Greater Norwich Local Plan

Housing numbers for the Greater Norwich Local Plan (GNLP)			
	Source	Overall number	Per annum
A	GNLP Housing Requirement 2015-2036³	39,486	1,880
B	Response to City Deal (net additional homes)	5,228	398
C	Total Housing to meet the Housing Requirement plus City Deal	44,714	2,129
To be delivered by the following supply:			
D	Housing completions 2015/16	1,782	
E	Housing commitments @ 01/04/2016	36,522	
F	Estimated growth of housing commitment 01/04/2016 to 31/03/2017	1,274	
G	Proposed new allocations	8,900	
H	GNLP Housing provision	48,478	
I	Windfall	Up to 5,603	
<p>The GNLP housing provision is 8,992 above the GNLP Housing Requirement. The buffer is therefore <u>23%</u> above OAN. However, this figure could rise to as much as <u>37%</u> if projected levels of windfall development are delivered in full.</p>			

³ This figure includes a 3,133 uplift which covers an element (37%) of the 8,361 dwelling City Deal requirement.

Appendix B - Delivery buffers

NPPF Requirements for Five Year Housing Land Supply

Although used in slightly different circumstances, a buffer of 20% is applied in cases where there has been a record of persistent under-delivery of housing. This is applied to ensure choice and competition in the market for land and provide greater certainty that the housing requirement will actually be delivered.

LPEG recommendations

The Local Plans Expert Group (LPEG) was established in September 2015 with a remit to consider how local plan making can be made more efficient and effective.

LPEG made a number of recommendations which included the implementation of housing policy and delivery. Whilst the recommendations do not currently form part of planning policy, they provide a useful insight into the issues that Government may currently be considering.

Two recommendations of LPEG are of particular relevance. The first is generally supportive of the identification of a delivery buffer:

“Local Plans should identify a housing requirement with sufficient deliverable or developable sites or broad locations to meet full objectively assessed housing need over the full plan period for their local area ... plus an additional allowance for flexibility appropriate to local circumstances.”⁴

The second recommendation relates to a further reserve site allowance in addition to the delivery buffer:

“Local Plans should make a further allowance, equivalent to 20% of their housing requirement, in developable reserve sites as far as is consistent with the policies set out in this (National Planning Policy) Framework”⁵

Flexibility in the Broadland, Norwich and South Norfolk local plans

Practical experience of the Greater Norwich authorities varies in relation to planning for a delivery buffer in their local plan documents.

Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk

Policy 4 of the Joint Core Strategy (JCS) establishes a Housing Requirement of 36,820 for Greater Norwich from 2008 to 2026. The Housing Requirement established in this policy was supported by a range of evidence sources. Policy 4 included a potential over provision of 930 homes outside the Norwich Policy Area (NPA). In addition, all of the Housing Requirement in the JCS was intended to be met through identifiable commitments or

⁴ Local Plan Expert Group, March 2016, Report to the Communities Secretary and to the Minister of Housing and Planning, Paragraph 41(i)

⁵ Local Plan Expert Group, March 2016, Report to the Communities Secretary and to the Minister of Housing and Planning, Paragraph 41(ii)

allocated sites. All windfall development that was expected to take place following the adoption of the site specific policy documents would therefore be additional.

Taking into account the potential overprovision in the rural areas and the impact of windfall, the total JCS provision was estimated to be 42,000. This is equivalent to a 14% delivery buffer.

In addition, and even in the context of the above, due to deliverability concerns the Inspector examining the Broadland Part of the Norwich Policy Area Local Plan in 2013 imposed an additional policy which required a short and focused local plan to be produced in the event that a significant shortfall in five year housing land supply occurred at any point after 2 years from the adoption date.

Broadland Site Allocations Plan and Growth Triangle AAP

Broadland’s Site Allocations Plan and Growth Triangle Area Action Plan, adopted 2015, both incorporated a percentage of over allocation (a delivery buffer).

Location	Homes Allocated	Housing Requirement	Percentage Delivery Buffer
Growth Triangle to 2026	7,993 to 8,193	7,000	14% to 17%
Growth Triangle Overall Total	11,602 to 11,802	10,000	16% to 18%
Remainder of Broadland NPA	2,365 to 2,565	2,000	18% to 28%
Total to 2026	10,358 to 10,758	9,000	15% to 20%
Total Overall	13,967 to 14,367	12,000	16% to 20%

The Growth Triangle Area Action Plan originally proposed over allocation of 760 to 960 homes in the form of reserve sites. As originally proposed the delivery buffer was set at appropriately 4% to 2026 and 8% overall. Ultimately the examining Inspector required a main modification that allocated both sites finding that:

“While the Plan does allocate sufficient land to accommodate more than the number of dwellings required by the JCS targets, the degree of overprovision is quite small. Moreover, the Framework advocates the need to “boost significantly the supply of housing”. It also encourages the provision of “choice and competition in the market for land”

Also that;

“Therefore it seems to me that these (reserve) sites should come forwards as soon as possible, especially considering the time it would take ... to get homes built on these sites...”⁶

⁶ Planning Inspectorate, 17 May 2016, Report on the Examination into Broadland District Growth Triangle Area Action Plan, paragraph 46 & 47, pg. 11

It should also be noted that, consistent with the approach of the JCS, no account was made of the likely impact of future windfall in regards to the delivery of housing. Therefore the potential level of delivery is actually in excess of the allocated amount.

Within the RPA Broadland's site allocations plans provided for 1,036 to 1,106 homes against a requirement of 690-1,080 homes. This is equivalent to a delivery buffer of up to 60% above the minimum JCS housing requirement, and, as in the NPA, further windfall would also be expected.

Care should be taken when using these RPA figures. This is because Broadland allocated to the upper end of the JCS range and therefore comparison with minimum requirements will provide a misleading figures for the analysis of the delivery buffer. The lower end of the specified range is the minimum required in the BDC RPA relative to OAN. The upper end represents an appropriate of development for a settlement to 2026 based upon settlement level analysis.

Norwich Site Allocations

The Inspector who examined the Norwich Site Allocation's Document noted that:

"...provision is made for over 11,000 dwellings between 2008 and 2026 compared to the JCS Policy 4 requirement of a minimum of 8,592 dwellings. This means that provision is about 28% higher than the JCS minimum requirement. Such a level of provision is in line with the exhortations in the NPPF to boost housing supply".⁷

South Norfolk Site Allocation Plan, Wymondham AAP and Long Stratton AAP

Within the NPA the South Norfolk site allocations plans provided for 14,046 homes compares with the JCS requirement of 13,156. A delivery buffer of just under 7%. In reference to the above the examining Inspector noted that "the safety margin above the requirement is fairly small".⁸

Whilst the Inspector did not propose Main Modifications to increase the scale of allocation, this was done on the basis that there were a number of mitigating factors that provided a greater level of flexibility than would be indicated by the allocation numbers themselves. Specifically that: no allowance was made for windfall, which could contribute a further 600 in the NPA during the plan period (This is equivalent to an 11% delivery buffer); that the housing requirement and allocation figures do not account for older people's housing, although provision is made for such in the plan; and that the yield assumptions on allocations were considered to be conservative.

The Inspector did however require a commitment to an early review, concluding that:

⁷ Planning Inspectorate, 13th October 2014, Report on the Examination into the Norwich Site Allocations and Site Specific Policies Local Plan, Paragraph 42

⁸ The Planning Inspectorate, 28th September 2015, Report on the Examination into the South Norfolk Local Plan (Site Specific Allocations & Policies Document, Development Management Policies Document and Wymondham Area Action Plan), Paragraph 50, pg. 14.

*“given the relatively small safety margin, it is important that a clear commitment is made to an early review of the plan. This will help ensure that an adequate supply of housing land is maintained”.*⁹

Within the RPA South Norfolk’s site allocations plans provided for 3,174 against a requirement of 2,368-2,908 homes. This is equivalent to a delivery buffer of 34% above the minimum JCS housing requirement and further windfall would also be expected within the South Norfolk RPA.

Care should be taken when using these figures as, like Broadland, South Norfolk allocated to the upper end of the range. Therefore comparison with minimum requirements will arguably provide a misleading figure for the analysis of the delivery buffer. The lower end of the specified range is the minimum required in the SNDC RPA relative to OAN. The upper end represents the appropriate of development for a settlement to 2026 based upon settlement level analysis.

In summary, national policy, local experience and the recommendations of the LPEG suggest that a delivery buffer of at least 20% above OAN should be applied.

Anticipated windfall development of over 5,000 dwellings from 2015 to 2036 could provide additional housing, potentially raising housing delivery to 37% above OAN.

⁹ The Planning Inspectorate, 28th September 2015, Report on the Examination into the South Norfolk Local Plan, Paragraph 54, pg. 15.

Greater Norwich Local Plan: Developing Growth Strategy Options

June 2017

Summary

This paper sets out emerging approaches for developing a range of reasonable growth options for the Greater Norwich Local Plan.

Recommendation

Members are invited to:

- consider the options presented in this report, noting that they are initial work to be further refined;
- comment on the options; and
- recommend to the constituent authorities that the report forms a reasonable basis for further investigation to be developed into a range of reasonable strategy options for the public consultation under Regulation 18 later this year.

Introduction

1. The purpose of this report is to seek the Board's views on emerging options for the Greater Norwich Local Plan (GNLP) growth strategy. These options must be "reasonable", that is they must be justified based on evidence. At examination in 2020, the strategic approach chosen for the plan must be positively planned, justified, effective and consistent with national policy to be found sound.
2. The paper builds on previous work reported to the Board in March 2017. It is supported by a draft high level sustainability appraisal.
3. It firstly sets out some of the background considerations for identifying growth options for housing, employment and other uses.
4. Secondly, a number of broad growth options are proposed. They are intended to provide Board members with the opportunity to comment on broad directions of travel for option development. As further evidence is gathered, more detail on the distribution of growth within the options will be included in the Regulation 18 public consultation on the plan. The options may well be modified to reflect evidence.
5. The consultation document will be considered at the September 2017 Board meeting.

Background

6. In 2014 the Greater Norwich Development Partnership (GNDP) committed to refreshing the local plan by 2020. This commitment is good practice to avoid unplanned development,

accords with government policy and is expected to be a government requirement in the near future.

7. The GNLP has the overarching aim of “**Growing stronger communities together**”. Its draft working vision for Greater Norwich to 2036, and the draft working objectives which provide further detail, will be consulted on and will set the framework for the plan. They currently reflect the ambition to grow the local economy and provide supporting infrastructure, whilst at the same time protecting and the enhancing the environment and building strong communities.
8. The draft working Vision and the Objectives are:

Vision

To grow vibrant, healthy communities supported by a strong economy and the delivery of homes, jobs, infrastructure and an enhanced environment.

Objectives

The objectives for Greater Norwich to 2036 to promote sustainable development in a rapidly changing world are:

Economy To support and promote the growth of an enterprising, creative, broad based economy with high productivity and a skilled workforce.

Communities To grow vibrant, healthy communities giving people a high quality of life in well-designed developments and good access to jobs, services and facilities.

Homes To enable delivery of high quality homes of the right size, mix and tenure to meet people’s needs throughout their lives.

Infrastructure To promote the timely delivery of infrastructure to support existing communities and growth; and to improve connectivity to allow access to economic and social opportunities.

Delivery To promote the delivery of housing, jobs and infrastructure supported by intervention mechanisms where the market is unable to deliver.

Environment To protect and enhance the built and natural environment, make best use of natural resources, mitigate against, and adapt to climate change.

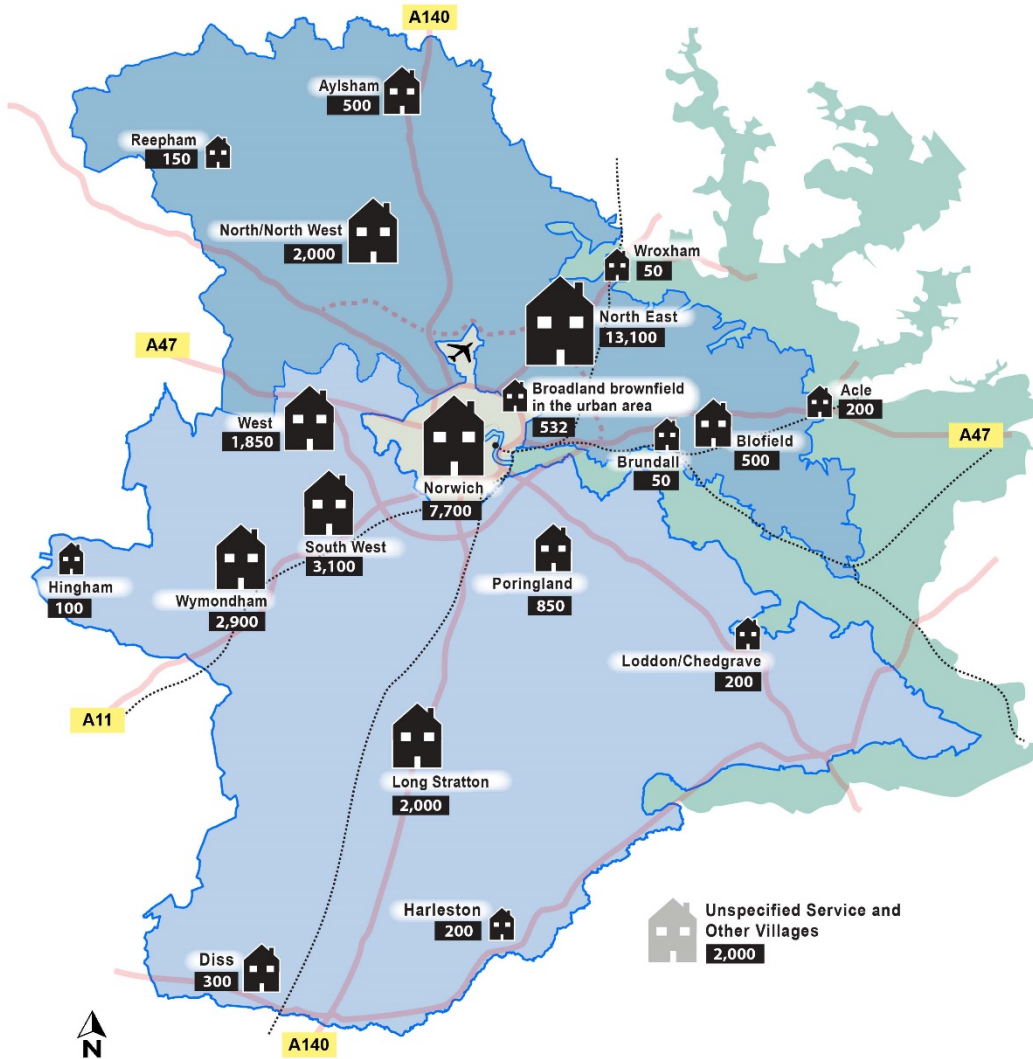
9. These objectives are now being used to inform broad growth strategy options and will assist in choosing actual sites for growth later in the plan making process. The strategy and the sites chosen for the submission plan in 2019 should be those which best help to achieve the plan’s vision and objectives.

The need for new housing

10. There are a number reasons for the need for additional housing in Greater Norwich:

- a. People are living longer with a tendency to smaller households. This increases the need for more houses irrespective of any growth in the population;
 - b. More people are moving into the area, mainly from other parts of this country, both because of economic growth and for lifestyle choices;
 - c. More people are in need of housing as not enough homes have been built in recent years leading to a local and national housing shortage.
11. A first step in plan making has been to work out how many homes will be required in Greater Norwich between now and 2036. Last year expert consultants were appointed to look at the latest data on population, life expectancy, economic growth and commuting as well as the size of families and other social changes. The consultant's report also covers housing affordability and sets out the sizes, tenures and mix of housing required to meet needs.
12. The need for approximately 48,500 new homes in Greater Norwich from 2015 to 2036 has been identified. This is an increase of around 1.3% per year.
13. The locations for the majority of these homes have already been established through existing plans and planning permissions (see Housing Commitment map below). The GNLP will need to identify sites additional sites for the remaining 8,900 of these homes. This figure includes a "buffer", or a safety factor, to provide the best opportunity for the number of homes needed to be delivered.
14. The Housing Numbers paper on this agenda provides further details on the above.

Housing Commitment



Key

- Norwich City Council (within the GNLP area)
- Broadland Area (within the GNLP area)
- South Norfolk Area (within the GNLP area)
- Broads Authority Area (outside the GNLP area)
- A Roads
- Railways
- ✈ Norwich International Airport

Housing Commitment



Location
Commitment 2016
 Note: Commitment figures are rounded to the nearest 50



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 South Norfolk District Council - 100019483

Balancing Choices

15. Maximising the benefits of growth and minimising any resulting conflicts present a number of choices which must be carefully balanced when identifying the most appropriate growth strategy for Greater Norwich.
16. The Options will provide different potential distributions of growth, with varying degrees of concentration nearer Norwich, focus on transport corridors and dispersal around the area, including the potential for a new settlement. The strategy chosen for the submission plan in 2019 may be an amalgam of the options. The options aim to provide a framework for considering different strategic approaches.
17. The approach taken to locating growth will have important long term implications for both our urban and rural communities. Access to services and jobs are key considerations, as is the need to ensure that housing is allocated in the locations most likely to deliver to meet housing need. Social, environmental and economic implications must all be considered in deciding the best growth strategy.
18. All the growth options in this paper aim to maximise growth on brownfield sites. However, it is important to note that large numbers of brownfield sites are already committed through existing plans in the area and the potential to identify additional sites is limited. The need to balance the amount of land required for housing and employment uses is a particular consideration in the city.
19. All the options also aim to enhance the vitality of towns and villages by providing them with “baseline” levels of growth. Different options provide different amounts of additional growth which could further assist in supporting vitality, though consideration must be given as to whether supporting services and facilities will be accessible in smaller settlements.
20. The size of allocations will also be a key consideration. Whilst larger sites can provide new services and facilities, recent experience has shown that they are more difficult to get off the ground. Smaller sites are often more likely to deliver and can support the vitality of existing settlements. Sites of less than 10 dwellings often do not provide affordable housing or the mix of housing sizes to provide the type of housing choice needed, particularly in our smaller communities. On the other hand, small sites offer the opportunity for self-build and for smaller builders which can increase the speed of housing delivery. Although capacity in the industry will have to be significantly increased if very large numbers of small sites are allocated.
21. New settlements may offer an additional means of providing for growth but tend to require significant investment in infrastructure so can be challenging to deliver.
22. The above considerations will form an important part of the plan consultation in October 2017.

23. The remainder of this paper sets the economic and transport infrastructure drivers which will help to shape the plan before proposing a number of growth options as the basis for the consultation.

Economic drivers

24. Economic issues that are proposed to shape the GNLP include:

- Norwich, and the City centre, are fundamental drivers of the local economy and their regional, national and international roles will be supported and enhanced.
- There are ongoing concerns about the loss of existing and potential office accommodation in the City centre which need to be addressed.
- We currently have a good distribution of existing and allocated strategic employment locations:
 - City centre
 - Norwich International Airport area
 - Rackheath with expansion
 - Broadland Business Park area
 - Norwich Research Park
 - Wymondham/Hethel
 - Longwater/FEZ.

All of these locations have land identified for further development. Greater Norwich also benefits from a wide distribution of smaller employment locations.

Emerging evidence (which at the time of writing is not complete) is indicating that there is no overall need for further employment land, indeed we may have significantly more available employment land than is required. While it is important for supply to exceed demand to provide for flexibility and choice, as further evidence emerges, there will be a need to consider whether there is scope for re-allocating some land. While there is no overall need, there might be a need to allocate some new small local sites to support housing growth; this will depend on how this growth is distributed.

- The GNLP will consider how the scale, distribution and type of housing can be used to drive economic growth.
- The Cambridge Norwich Tech Corridor growth initiative will be supported through the Local Plan.
- Growth of the economies of the main towns and rural areas will be encouraged and supported.
- Some housing growth will be identified in all villages with a reasonable range of services (unless there are no site options in a village) to support the rural economy and aid delivery.

New transport infrastructure

25. Important new transport infrastructure and services are due to come on stream in the next few years and may influence growth options:
- The Northern Distributor Road is due to open at the end of 2017 or early 2018;
 - By the early 2020s construction is due to have started on capacity improvement to the A11/A47 Thickthorn junction and on the dualling of the A47 from Blofield to North Burlingham and North Tuddenham to Easton. The junction arrangements on these newly dualled sections are not yet known;
 - On the A140 the Long Stratton bypass and improvement to the Hempnall crossroads will be delivered as part of the existing housing allocation;
 - A western link road between the A1067 and A47 is a County Council priority but is not yet sufficiently advanced for growth options in the GNLP to rely on its implementation;
 - The current rail franchise commits to replacement of the carriage fleet, faster journey times between Norwich and London, and Norwich to Cambridge services extended to Stansted.

Emerging Policy Options

Settlement Hierarchy

26. A settlement hierarchy needs to be defined to help shape growth options. The hierarchy is not an end in itself. It is a reflection of the range and type of service provision available to communities and therefore a guide to sustainability. The hierarchy is a starting point but will not, by itself, determine the scale of development that is appropriate in any particular settlement. This will take account of a range of factors such as the scale, range and quality of local services; deliverability; location in relation to strategic services and job opportunities; and local constraints and opportunities.
27. It is reasonable to retain the current levels in the hierarchy of “Norwich urban area¹”, “main towns”, “key service centres” (KSCs), “service villages”, “other villages”, and “countryside”.
28. The Norwich urban area reflects the continuous urban area, while the *main towns* and *KSCs* reflect their level and range of services. Main towns have a good range of day to day services and local employment. The KSCs are larger villages with a more limited range of opportunities. These factors have not changed significantly so it can be assumed the places at these levels of the hierarchy remain as current.
29. The definition of *service villages* and *other villages* reflect their more limited range of basic services. Reasonable Options for defining where settlements sit at this level of the hierarchy

¹ The existing urban area includes the built-up parts of the urban fringe parishes.

will be subject to Regulation 18 consultation but, for the purposes of this paper, a *service village* is assumed to have a minimum requirement of a primary school plus 2 other core services (i.e. 2 from a shop, village hall, and travel to work public transport). This would result in about 50 *service villages* – currently just over 30 in South Norfolk and around 20 in Broadland.

Housing assumptions

30. Currently, we are expecting that the GNLP will provide for around 48,500 dwellings in the period 2015 to 2036. This requirement includes a “contingency” uplift to aid delivery (see housing requirements paper on this agenda).
31. In the period before the GNLP is finalised for Regulation 19 submission, new planning permissions are very likely to be granted on unallocated land, or new deemed consents will come forward. This additional commitment will reduce the need for new allocations to be made. **However, the total additional requirement currently needs new allocations for approximately 8,900 dwellings.**
32. It is a reasonable assumption that consideration of the distribution of growth should start from a baseline of two “bookends”: maximised urban capacity; and a level of rural growth that will help sustain town and village life, provide choice and aid delivery.

Urban capacity

33. For a range of reasons it is reasonable to maximise development within the urban area. These include:
 - minimising the need for greenfield development;
 - supporting the economy; and
 - as far as possible, addressing need where it is generated.
34. The current assessment of sites that can be allocated in Norwich identifies capacity for 1,500 additional dwellings.
35. Urban capacity in Sprowston and Thorpe St Andrew could provide up to 200 additional dwellings.
36. This leaves **7,200 dwellings to find**.
37. It may be possible to identify further development opportunities within Norwich, for example through intensification, estate renewal or redevelopment of existing employment areas. Such an approach would raise a number of issues around sustainability and deliverability, and could only be contemplated for inclusion in the GNLP if a clear delivery mechanism is in place. It is proposed to continue to investigate this potential. If additional deliverable capacity can be identified then this will be included in the Regulation 18 consultation. At this time, it is not possible to indicate how much additional growth could be identified.
38. Any additional urban capacity that can be identified will reduce the scale of growth in locations outside the urban area in each of the Options in this paper.

Growth in Main Towns and KSCs

39. The following table sets out the existing level of commitment in the Main Towns and Key Service Centres.

Settlement	Completed since 2015 and currently permitted or allocated.
Town	
Aylsham	622
Diss (incl Roydon)	386
Harleston	235
Wymondham	2,943
Long Stratton	1,987
Total for Main Towns	6,173
Key Service Centre	
Acle	210
Blofield	482
Brundall	179
Hethersett	1,405
Hingham	102
Loddon/Chedgrave	229
Poringland/Framingham Earl	916
Reepham	181
Wroxham	103
Total for Key Service Centres	2,402

40. The scale of committed growth in these settlements varies. This reflects a range of local and more strategic issues including the current policy approach of locating most growth in areas best related to Norwich.
41. Of the Main Towns, Diss has a number of attributes that could make it a candidate for growth and has a relatively low number of permitted and allocated houses. Initial investigation is underway to investigate highway constraints in the town. The Diss & District Neighbourhood Plan is in the early stages of production, and is likely to comprise four South Norfolk parishes, and three Mid-Suffolk parishes. No decisions have been taken as to the scale and location of housing and employment growth that the Neighbourhood Plan might plan for, but discussions are likely to begin in earnest from June 2017.
42. The Main Towns and KSCs continue to provide sustainable locations for development and it is reasonable to assume around 1,000 dwellings in Towns and KSCs, this **leaves 6,200 dwellings** to find.

Service villages and other villages

43. Seeking affordable housing on sites of 10 or less is discouraged by Government. It can be difficult to provide affordable housing on smaller sites. Sites of at least 20 dwellings are more likely to facilitate higher numbers of affordable homes. Therefore, in most cases it can be assumed that allocations will be of at least 11 dwellings and usually a minimum of around 20.
44. In order to establish a reasonable baseline it can be assumed that **Service Villages** will be allocated an average of 20 dwellings each. With around 50 service villages the baseline provision would total 1,000 dwellings.
45. Assuming allocations of up to 20 dwellings in those **Other Villages** with access to a primary school would provide up to 200 dwellings (possibly c10 villages at 20 dwellings each), otherwise no allocations would be proposed but small scale windfall could be encouraged, through wider development boundaries, and/or policy encouraging edge of boundary development. These alternatives can be explained through the Regulation 18 Consultation.
46. A baseline total of 1,200 dwellings in these smaller villages **leaves 5,000 dwellings** to find.
47. At this stage we have not discounted the very small element of growth that will take place in the Broads Authority area. This equates to an Objectively Assessed Need (OAN) of around 100 which is likely to be exceeded by allocations in the Broads Local Plan.
48. The Regulation 18 consultation will address the issue of statutory Green Belt. If a Green Belt were to be pursued, further consideration would need to be given as to how this would relate to the preferred growth strategy.

49. To recap:

Total requirement for new allocations = 8,900.

Base position for new allocations:

- **Norwich 1,500;**
- **Broadland brownfield in the urban area 200;**
- **Towns and KSCs 1,000;**
- **Service villages 1,000;**
- **Other villages 200.**

Therefore there are 5,000 dwellings to find.

50. Points to note:

- **In the options below the scale of growth in named places outside the Norwich urban area should be considered to be (more or less) in addition to any allocations identified above that it might receive as a town, KSC or service village;**
- **The potential total scale of growth in locations (existing commitment plus the emerging options) is illustrated in Appendix 1;**

- **Distributions have not been tested in detail and there may be constraints e.g. in relation to infrastructure capacity and delivery, or environmental issues.**
- **Options refer to the overall scale of additional growth in a location. To maximise delivery, in locations where significant growth is proposed this may be spread over multiple sites. Larger sites may be allocated where early delivery can be demonstrated – for example where a site is an extension to one already being developed**
- **Economic, housing need and housing delivery evidence, plus the high level of existing commitment in Broadland, suggests overall levels of growth should be higher in South Norfolk than Broadland.**

Alternative options for additional housing allocations

51. Seven different reasonable options have been developed. While there are common elements and an overlap between them, they are intended to reflect alternative strategic concepts such as urban concentration or dispersal. It is quite possible that a favoured option could draw on elements from any of the options.
52. The Options are all reasonable and deliver on the draft objectives, but each will vary on how well they perform against each individual objective.
53. Early analysis of the Options is included in the draft Sustainability Appraisal (SA). The draft SA makes assessments against more detailed sustainability objectives. More detailed analysis will be needed as the Options develop.
54. The SA concludes that Options 1, 2 and 3 may be harder to deliver. This is because they focus growth in locations that have already seen significant growth, have significant outstanding commitment and have experienced delivery issues over the JCS period. Alternatives 4 and 5 provide for a much wider dispersal of development, and in doing so increase diversity, choice and competition in the market for land, which should be beneficial for delivery. If so, then alternatives 4 and 5 would perform better than alternatives 1, 2 and 3 for delivery. Options 6 and 7 lay somewhere in between.
55. However, Options 1, 2 and 3 perform better than alternatives 4 and 5 in relation to objectives that seek to improve air quality, reduce the impact of traffic, address climate change issues, increase active travel and support economic development. This a result of the better geographical relationship of development under these options to services, facilities, employment opportunities and sustainable transport options. Again Options 6 and 7 sit somewhere in between.

Option 1 Urban concentration (close to Norwich)

The majority of the 48,500 dwellings requirement is already allocated or permitted. The total requirement for new allocations = 8,900.

In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all Options include a “base position” for new allocations of:

- Norwich 1,500;
- Broadland brownfield in the urban area 200;
- Towns and KSCs 1,000;
- Service villages 1,000;
- Other villages 200.

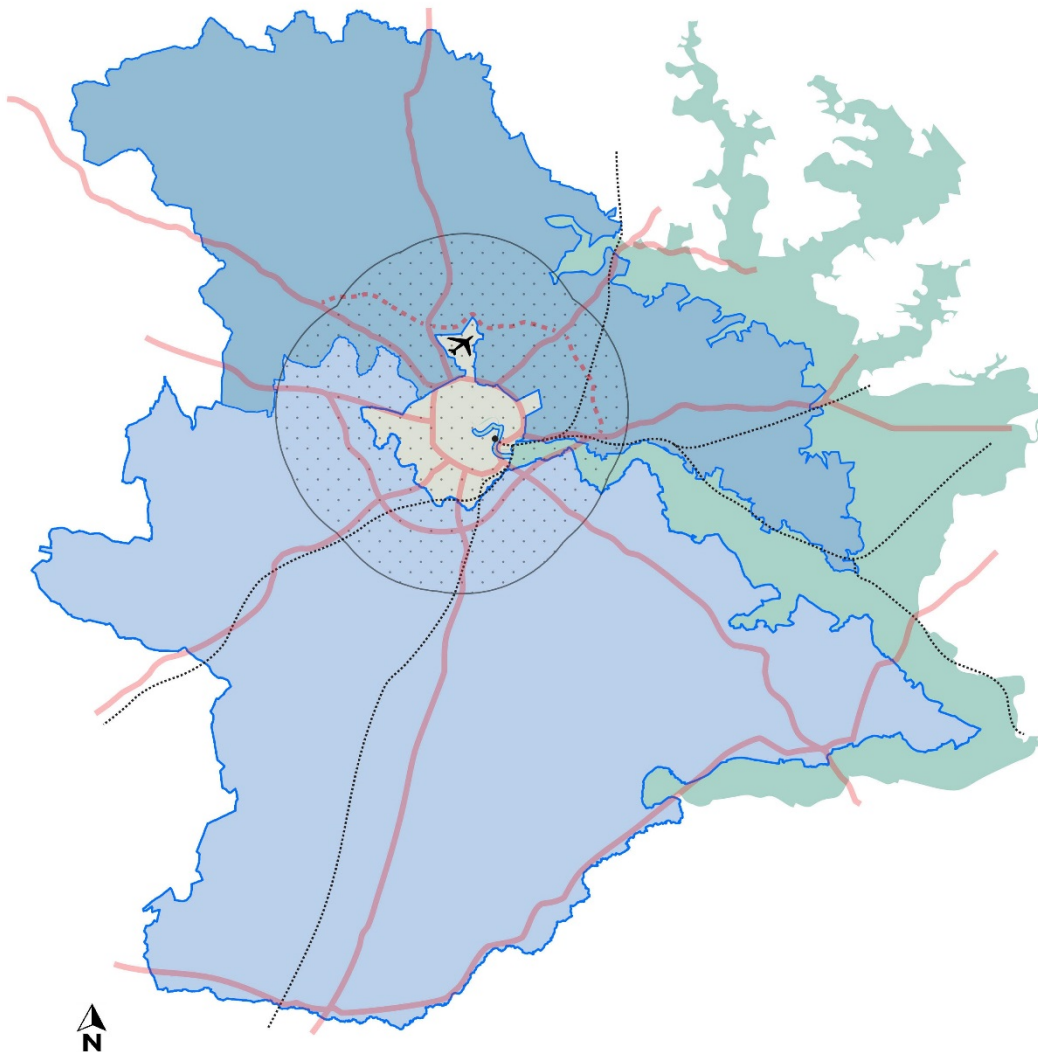
Therefore there are 5,000 dwellings to find. All Options distribute some of this growth to the urban fringe parishes around Norwich although locations will vary when site options are fully assessed.

This option would concentrate all 5,000 additional dwellings close to Norwich in the form of urban extensions or in some of the closest villages.





To deliver this option it might be assumed that the number of additional dwellings might be distributed as

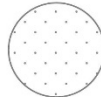



- around 1,000 in the North East Growth Triangle
- around 1,000 in the north west fringe parishes of Horsford, Taverham, Drayton and Hellesdon
- around 1,000 in the western fringe
- around 1,500 in South West parishes of Cringleford, Lt Melton and Hethersett;
- around 500 in distributed among smaller villages or villages slightly more distant such as Horsham St. Faith, Spixworth, Poringland, Swardeston, and Mulbarton.

Urban Concentration (close to Norwich)



Key

-  Norwich City Council (within the GNLP area)
-  Broadland Area (within the GNLP area)
-  South Norfolk Area (within the GNLP area)
-  Broads Authority Area (outside the GNLP area)

-  Urban concentration area
-  A Roads
-  Railways
-  Norwich International Airport



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 South Norfolk District Council - 100019483

Option 2 Transport corridors

The majority of the 48,500 dwellings requirement is already allocated or permitted. The total requirement for new allocations = 8,900.

In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all Options include a “base position” for new allocations of:

- Norwich 1,500;
- Broadland brownfield in the urban area 200;
- Towns and KSCs 1,000;
- Service villages 1,000;
- Other villages 200.

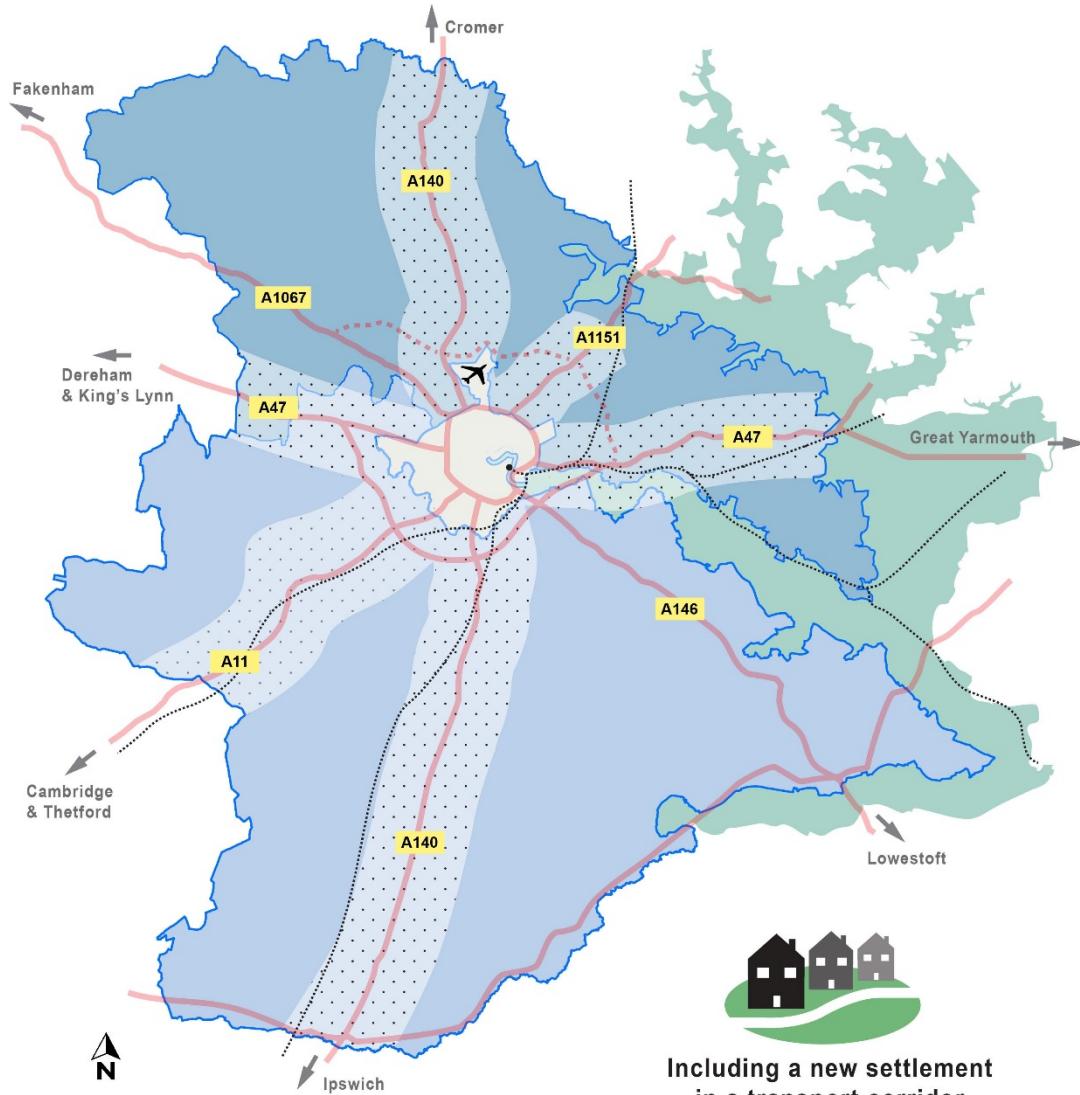
Therefore there are 5,000 dwellings to find. All Options distribute some of this growth to the urban fringe parishes around Norwich although locations will vary when site options are fully assessed.

This Option would concentrate most of the additional 5,000 dwellings in the main transport corridors. There is a degree of overlap with Option 1 as urban fringe locations tend to be well served by transport corridors.





To deliver this option it might be assumed that the number of additional dwellings might be distributed as

- around 1,000 in the North East Growth Triangle;
- around 200 in the north west fringe parishes of Horsford, Taverham, Drayton and Hellesdon;
- around 500 in the A47/Dereham Rd corridor (West fringe);
- around 1,500 in A11 corridor (South West fringe parishes of Cringleford, Lt Melton and Hethersett; and Wymondham);
- around 800 on the A140(S) in Diss and the villages on the A140 (other than Long Stratton where there are significant constraints to growth beyond current commitments);
- a new settlement on one of the main corridors delivering around 1000 dwellings in the plan period. It would be expected to grow significantly after 2036 with the final scale dependent on the characteristics of the location and access to services;
- it is assumed that there would be no growth above baseline on the A47(E) reflecting proximity to the Broads and significant existing commitments.

Transport Corridors

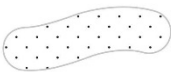





Key

-  Norwich City Council (within the GNLP area)
-  Broadland Area (within the GNLP area)
-  South Norfolk Area (within the GNLP area)
-  Broads Authority Area (outside the GNLP area)



Including a new settlement in a transport corridor

-  Transport Corridor
-  A Roads
-  Railways
-  Norwich International Airport



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Option 3 Supporting the Cambridge Norwich Tech Corridor

The majority of the 48,500 dwellings requirement is already allocated or permitted. The total requirement for new allocations = 8,900.

In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all Options include a “base position” for new allocations of:

- Norwich 1,500;
- Broadland brownfield in the urban area 200;
- Towns and KSCs 1,000;
- Service villages 1,000;
- Other villages 200.

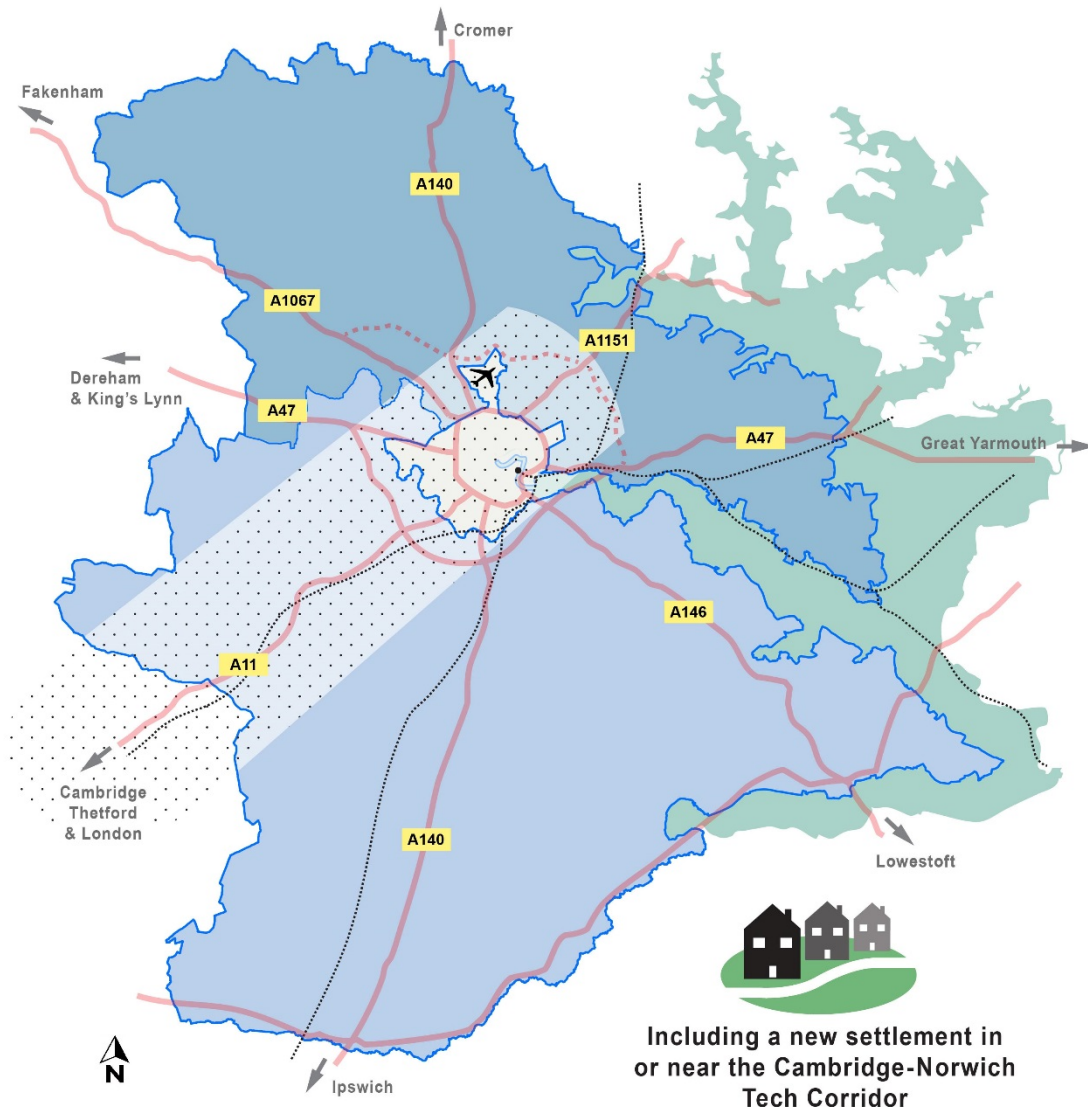
Therefore there are 5,000 dwellings to find. All Options distribute some of this growth to the urban fringe parishes around Norwich although locations will vary when site options are fully assessed.

The Cambridge Norwich Tech Corridor initiative identifies the potential of this area for economic growth. The A11 and adjacent Norwich Cambridge railway line lie at the heart of the corridor. The option concentrates most of the 5,000 dwellings in the A11 corridor and near to the main economic assets associated with it such as Norwich Research Park (NRP) and Hethel;

To deliver this option it might be assumed that the 5,000 additional dwellings could be distributed as





- around 300 in the north west fringe parishes of Horsford, Taverham, Drayton and Hellesdon Providing a degree of growth in part of the Broadland urban fringe;
- around 1,000 in the West fringe – which lies between the Norwich Research Park and the Food Enterprise Zone (FEZ) area;
- around 1,500 in existing settlements on the A11 corridor (South West fringe parishes of Cringleford, Lt Melton and Hethersett; and Wymondham);
- a new settlement in the A11 corridor delivering around 1000 dwellings in the plan period. It would be expected to grow significantly after 2036 with the final scale dependent on the characteristics of the location and access to services;
- around 200 at Hingham which is a key service centre reasonably close to the A11 corridor and with some history of tech industries;
- around 500 in Diss and nearby villages.

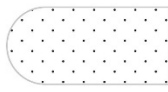

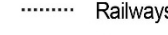
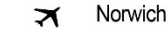
Supporting the Cambridge-Norwich Tech Corridor



Including a new settlement in or near the Cambridge-Norwich Tech Corridor

Key

-  Norwich City Council (within the GNLP area)
-  Broadland Area (within the GNLP area)
-  South Norfolk Area (within the GNLP area)
-  Broads Authority Area (outside the GNLP area)

-  Cambridge-Norwich Tech Corridor
-  A Roads
-  Railways
-  Norwich International Airport



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Option 4 Dispersal

The majority of the 48,500 dwellings requirement is already allocated or permitted. The total requirement for new allocations = 8,900.

In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all Options include a “base position” for new allocations of:

- Norwich 1,500;
- Broadland brownfield in the urban area 200;
- Towns and KSCs 1,000;
- Service villages 1,000;
- Other villages 200.

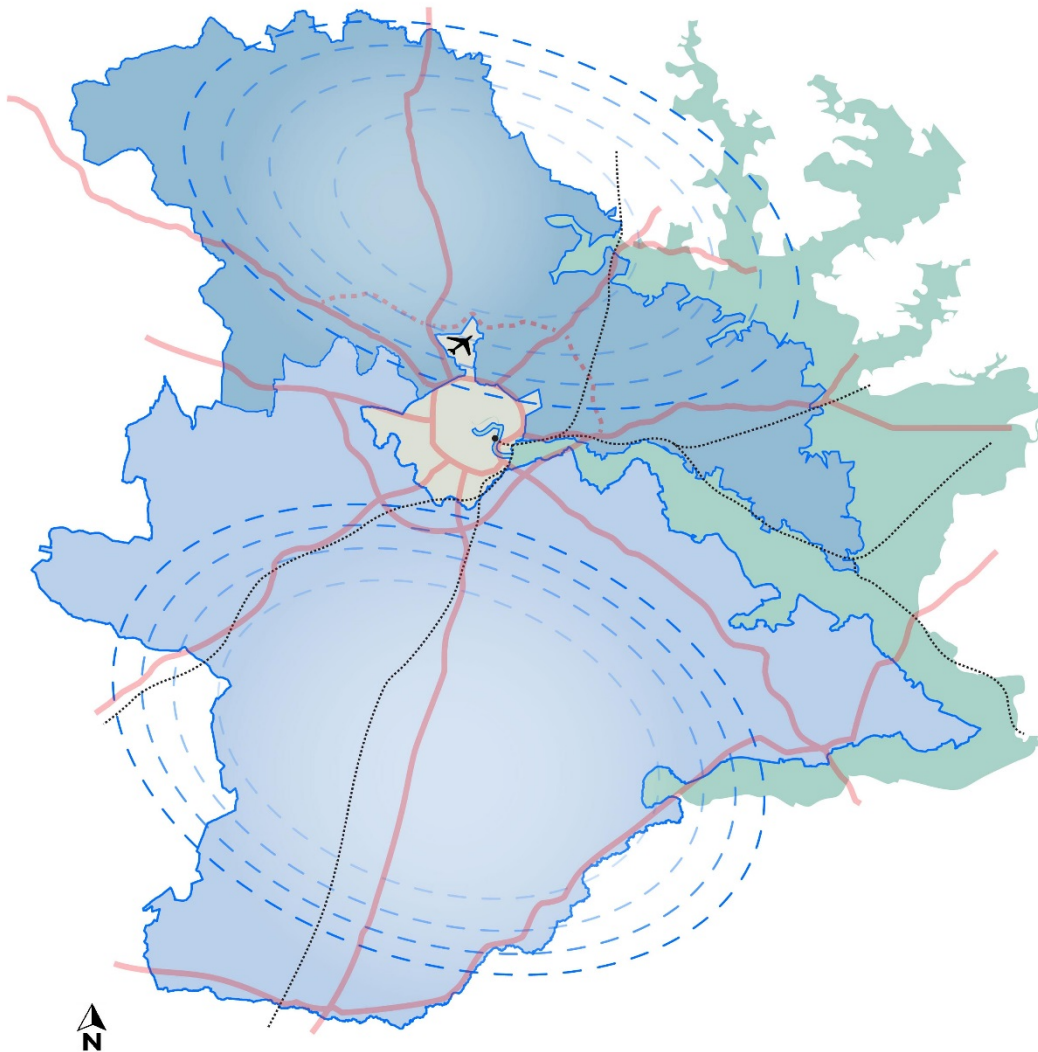
Therefore there are 5,000 dwellings to find. All Options distribute some of this growth to the urban fringe parishes around Norwich although locations will vary when site options are fully assessed.

This Option provides higher levels of dispersal to villages while retaining some limited growth in the Norwich fringe parishes and the A11 corridor





To deliver this option it might be assumed that the 5,000 additional dwellings could be distributed as

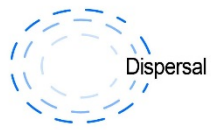
- around 300 in the north and north west fringe parishes of Horsham and Newton St Faiths, Horsford, Taverham, Drayton and Hellesdon. Providing a degree of growth in part of the Broadland urban fringe;
- around 500 dwellings in the west fringe;
- around 500 in existing settlements on the A11 corridor (South West fringe parishes of Cringleford, Lt Melton and Hetherset; and Wymondham);
- around 400 distributed across 4 towns/KSCs in South Norfolk (Diss, Harleston, Hingham and Loddon);
- 3,300 additional dwellings in Service and Other Villages (making a total of 4,500 in these settlements). The distribution of growth between these villages would be dependent on a range of factors including availability of sites, location, access to services, and deliverability.

Dispersal



Key

-  Norwich City Council (within the GNL area)
-  Broadland Area (within the GNL area)
-  South Norfolk Area (within the GNL area)
-  Broads Authority Area (outside the GNL area)



-  A Roads
-  Railways
-  Norwich International Airport



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Option 5 Dispersal plus a new settlement

The majority of the 48,500 dwellings requirement is already allocated or permitted. The total requirement for new allocations = 8,900.

In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all Options include a “base position” for new allocations of:

- Norwich 1,500;
- Broadland brownfield in the urban area 200;
- Towns and KSCs 1,000;
- Service villages 1,000;
- Other villages 200.

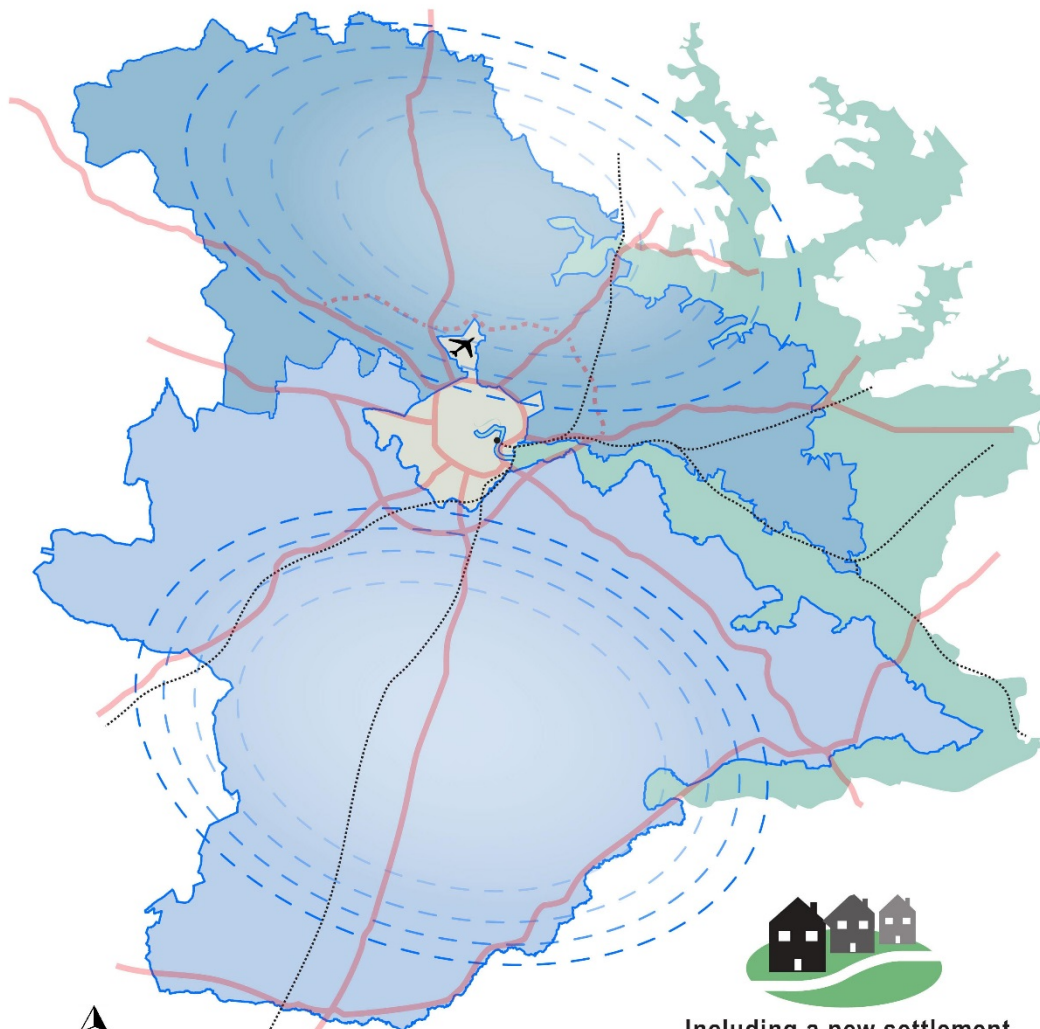
Therefore there are 5,000 dwellings to find. All Options distribute some of this growth to the urban fringe parishes around Norwich although locations will vary when site options are fully assessed.

This Option would be very similar to Option 4 but would divert some of the growth dispersed to villages and concentrate it in a new settlement

To deliver this option it might be assumed that the 5,000 additional dwellings could be distributed as





- around 300 in the north and north west fringe parishes of Horsham and Newton St Faiths, Horsford, Taverham, Drayton and Hellesdon. Providing a degree of growth in part of the Broadland urban fringe;
- around 500 dwellings in the west fringe;
- around 500 in existing settlements on the A11 corridor (South West fringe parishes of Cringleford, Lt Melton and Hetherset; and Wymondham);
- around 400 distributed across 4 towns/KSCs in South Norfolk (Diss, Harleston, Hingham and Loddon);
- 2,300 additional dwellings in Service and Other Villages (making a total of 3,500 in these settlements). The distribution of growth between these villages would be dependent on a range of factors including availability of sites, location, access to services, and deliverability.
- a new settlement somewhere in the area delivering around 1000 dwellings in the plan period. It would be expected to grow significantly after 2036 with the final scale dependent on the characteristics of the location and access to services;

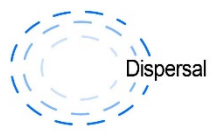
Dispersal plus new Settlement



Including a new settlement
in a transport corridor

Key

-  Norwich City Council (within the GNLP area)
-  Broadland Area (within the GNLP area)
-  South Norfolk Area (within the GNLP area)
-  Broads Authority Area (outside the GNLP area)



Dispersal

-  A Roads
-  Railways
-  Norwich International Airport



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Norwich City Council - 100019747
South Norfolk District Council - 100019483

Option 6 Dispersal plus urban growth

The majority of the 48,500 dwellings requirement is already allocated or permitted. The total requirement for new allocations = 8,900.

In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all Options include a “base position” for new allocations of:

- Norwich 1,500;
- Broadland brownfield in the urban area 200;
- Towns and KSCs 1,000;
- Service villages 1,000;
- Other villages 200.

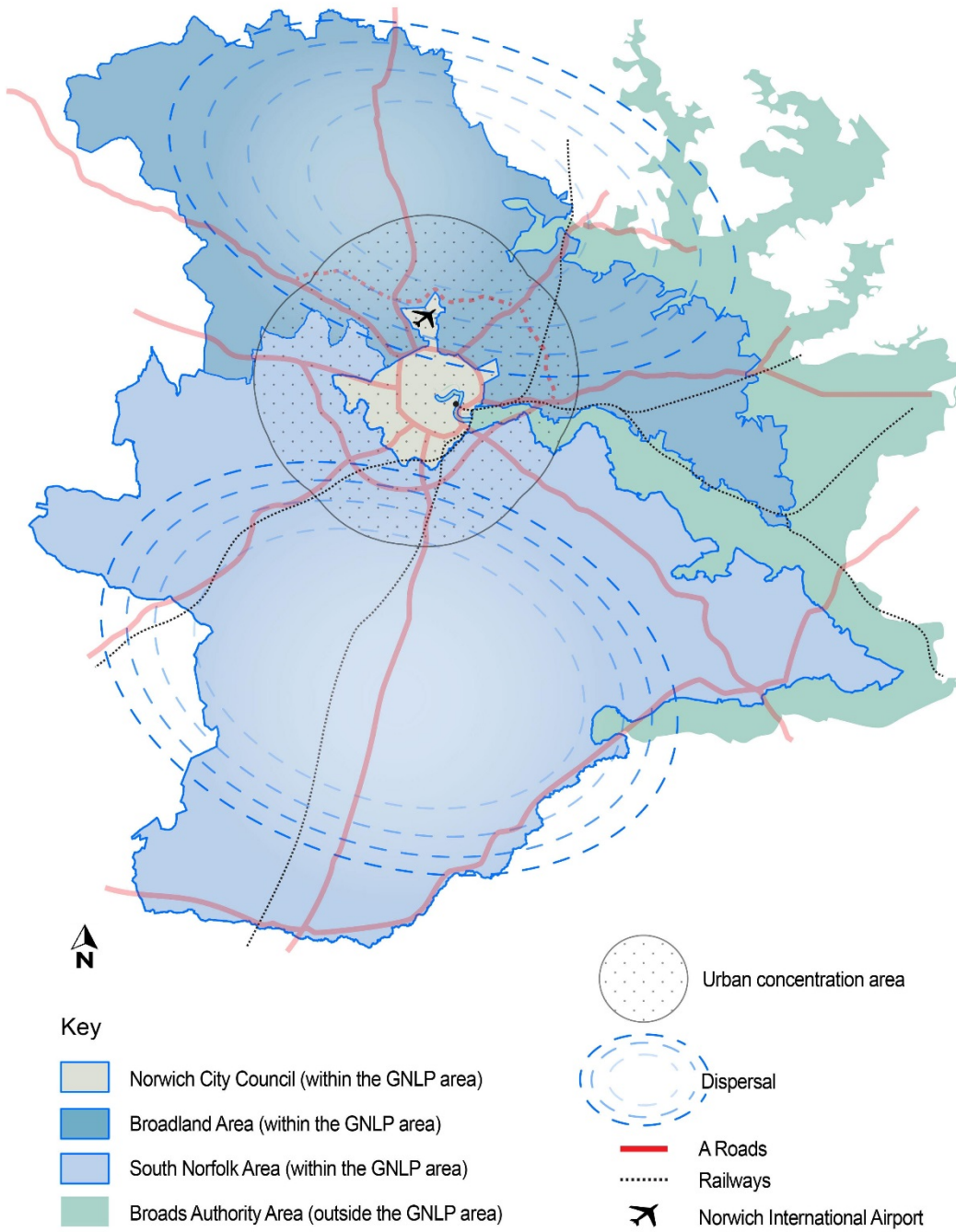
Therefore there are 5,000 dwellings to find. All Options distribute some of this growth to the urban fringe parishes around Norwich although locations will vary when site options are fully assessed.

This Option would be similar to Option 5 but would locate more growth in the urban fringe (within the north east growth triangle) rather than in a new settlement.

To deliver this option it might be assumed that the 5,000 additional dwellings could be distributed as

- around 1,000 in the North East Growth Triangle;
- around 300 in the north and north-west fringe parishes of Horsham and Newton St Faiths, Horsford, Taverham, Drayton and Hellesdon. Providing a degree of growth in part of the Broadland urban fringe;
- around 500 dwellings in the west fringe;
- around 500 in existing settlements on the A11 corridor (South West fringe parishes of Cringleford, Lt Melton and Hetherset; and Wymondham);
- around 400 distributed across 4 towns/KSCs in South Norfolk (Diss, Harleston, Hingham and Loddon);
- 2,300 additional dwellings in Service and Other Villages (making a total of 3,500 in these settlements). The distribution of growth between these villages would be dependent on a range of factors including availability of sites, location, access to services, and deliverability.

Dispersal plus Urban Growth



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 South Norfolk District Council - 100019483

Option 7 Dispersal, urban growth and a new village

The majority of the 48,500 dwellings requirement is already allocated or permitted. The total requirement for new allocations = 8,900.

In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all Options include a “base position” for new allocations of:

- Norwich 1,500;
- Broadland brownfield in the urban area 200;
- Towns and KSCs 1,000;
- Service villages 1,000;
- Other villages 200.

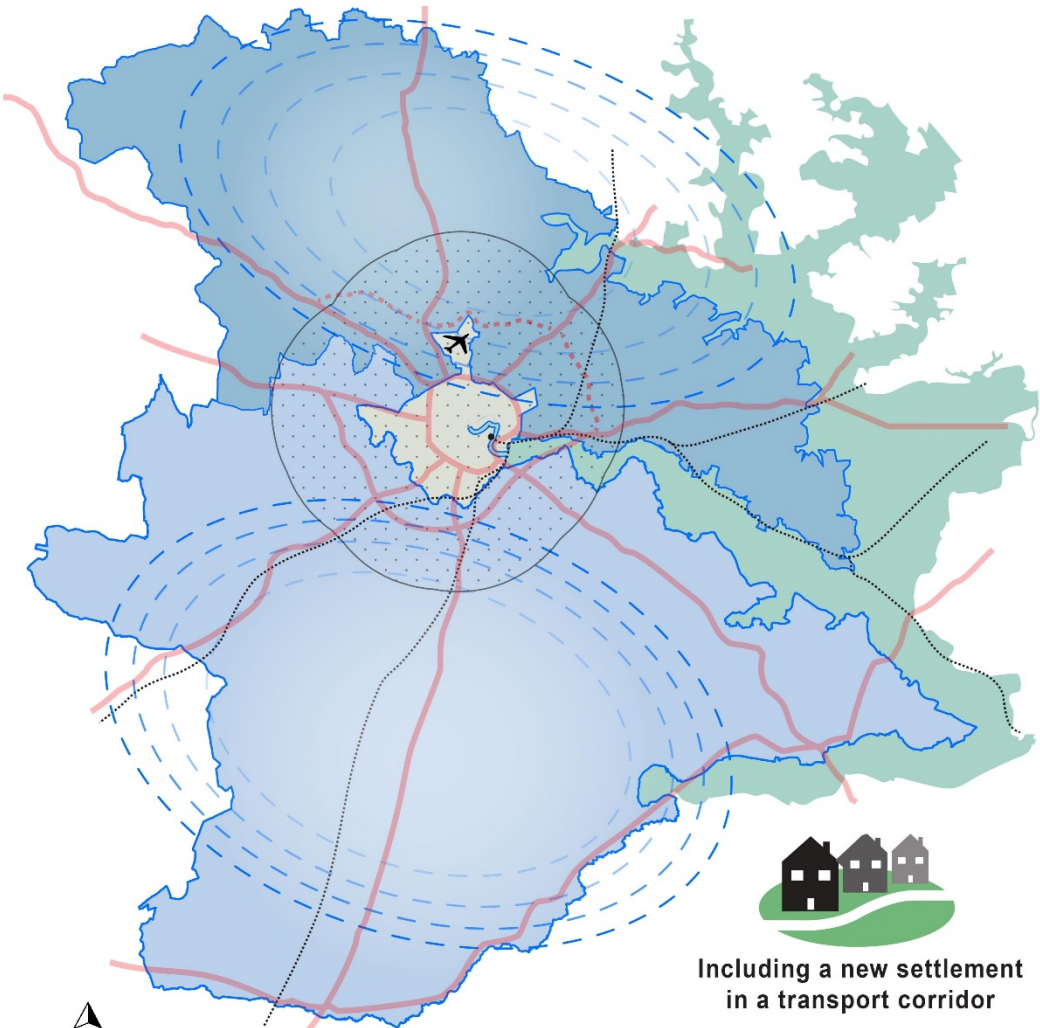
Therefore there are 5,000 dwellings to find. All Options distribute some of this growth to the urban fringe parishes around Norwich although locations will vary when site options are fully assessed.

This Option combines an element of dispersal with urban fringe growth triangle and a new settlement.





To deliver this option it might be assumed that the 5,000 additional dwellings could be distributed as






- around 1,000 in the North East Growth Triangle;
- around 300 in the north and north-west fringe parishes of Horsham and Newton St Faiths, Horsford, Taverham, Drayton and Hellesdon. Providing a degree of growth in part of the Broadland urban fringe;
- around 500 dwellings in the west fringe;
- around 500 in the South West fringe parishes (Cringleford, Lt Melton and Hethersett);
- around 400 distributed across 5 towns/KSCs in South Norfolk (Wymondham, Diss, Harleston, Hingham and Loddon);
- 1,300 additional dwellings in Service and Other Villages (making a total of 2,500 in these settlements). The distribution of growth between these villages would be dependent on a range of factors including availability of sites, location, access to services, and deliverability.
- a new settlement somewhere in the area delivering around 1000 dwellings in the plan period. It would be expected to grow significantly after 2036 with the final scale dependent on the characteristics of the location and access to services;

Dispersal, Urban Growth & New Settlement



Key

-  Norwich City Council (within the GNLP area)
-  Broadland Area (within the GNLP area)
-  South Norfolk Area (within the GNLP area)
-  Broads Authority Area (outside the GNLP area)

-  Urban concentration area
-  Dispersal
-  A Roads
-  Railways
-  Norwich International Airport



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 Norwich City Council - 100019747
 South Norfolk District Council - 100019483

The following table illustrates the scale of new growth and existing commitments that would result from the various Options:

			Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
Location	Parish	Completed or Committed	Urban Concentration	Transport Corridors	Cambridge Norwich Tech Corridor	Dispersal	Dispersal Plus New Village	Dispersal Plus Urban Growth	Dispersal Urban Growth New Village
Norwich		8052	1,500 9,552	1,500 9,552	1,500 9,552	1,500 9,552	1,500 9,552	1,500 9,552	1,500 9,552
North East	Old Catton	33							
	Sprowston	56	1,200 14,405	1,200 14,405	200 13,405	200 13,405	200 13,405	1,200 14,405	1,200 14,405
	Thorpe St. Andrew Growth Triangle	304 12812							
North / North West	Hellesdon	1393							
	Horsford	405	1,000 3,104	200 2,304	300 2,404	300 2,404	300 2,404	300 2,404	300 2,404
	Drayton	286							
	Taverham	20							
West	Bawburgh	18							
	Costessey	1059	1,000 2,983	500 2,483	1,000 2,983	500 2,483	500 2,483	500 2,483	500 2,483
	Easton	906							
South West	Cringleford	1751							
	Hethersett	1405	1,500 4,731	500 3,731	1,500 4,731	350 3,581	350 3,581	350 3,581	500 3,731
	Little Melton	75							
Main Towns		6173	550 6,723	1750 7,923	1250 7,423	900 7,073	900 7,073	900 7,073	750 6,923
Key Service Centres			650 3,052	550 2,952	650 3,052	750 3,152	750 3,152	750 3,152	650 3,052
New Village(s)		2402	0 0	1,000 1,000	1,000 1,000	0 0	1,000 1,000	0 0	1,000 1,000
Service and Other Villages		2374	1,500 3,874	1,700 4,074	1,500 3,874	4,400 6,774	3,400 5,774	3,400 5,774	2,500 4,874
Total New Allocations			8,900	8,900	8,900	8,900	8,900	8,900	8,900
Total Housing Provision 2015-36			48,424	48,424	48,424	48,424	48,424	48,424	48,424

Greater Norwich Local Plan

High Level Sustainability Appraisal of Housing Numbers and Growth Distribution options

**This is a background paper to the Housing Numbers and Growth Options papers
for the June 2017 GNDP Board**

Preface

This paper contains an explanation and high-level Sustainability Appraisal (SA) of the emerging policy alternatives for the Housing Numbers and Growth Distribution options for the Greater Norwich Local Plan.

The explanation and appraisal is not intended to be a final Sustainability Appraisal of the emerging alternatives. It has been produced to help inform debate.

The explanation and appraisal will be revised as appropriate throughout the plan making process.

It is intended that an "Interim Sustainability Appraisal" of emerging policies will be published alongside the Regulation 18 Issues and Options consultation on the GNLP in late 2017.

A further Sustainability Appraisal document will be produced and published alongside the pre-submission versions of the GNLP in 2019.

The SA that accompanies the final submission of the GNLP for examination will be the version intended to meet legal requirements.

1. Identifying Reasonable Alternatives

- 1.1. Identifying and evaluating Reasonable Alternatives is an essential part of the plan making and sustainability appraisal process from both a practical and legal compliance point of view.
- 1.2. In legal compliance terms, Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004 requires the environmental report to identify, describe and evaluate the likely significant effects on the environment of implementing the plan and reasonable alternatives taking into account the objectives and geographical scope of the plan.
- 1.3. From a practical point of view, a robust approach to identifying, evaluating and selecting alternatives will ensure, as far as practicable, that the preferred approach included in the final version of the plan is justifiable and deliverable.
- 1.4. The geographical scope of the GNLP is the combined local planning authority areas of Broadland, Norwich and South Norfolk. For the purposes of defining reasonable alternatives, the objectives that have been taken into account are the "working draft" GNLP Objectives considered by the GNLP board on 17 January 2017.
- 1.5. At this stage, for an alternative to have been considered "reasonable" it must be deemed to assist in the achievement of, and be otherwise compatible with the "working draft" GNLP Objectives. In addition, for an alternative to be "reasonable" there must also be a reasonable expectation that it can be delivered.
- 1.6. At this time the alternatives being considered are limited to the employment sites strategy; the plan housing requirement and development distribution alternatives.

1.7. Core Housing Matters

- 1.7.1. The working draft objectives of the GNLP seek to deliver the high quality homes that are needed within Greater Norwich, supporting healthy and vibrant communities and economic growth.
- 1.7.2. To establish the core elements of the GNLP housing policy consideration will need to be given to: the evidence of the Objectively Assessed Need (OAN) for housing; establishing whether the GNLP Housing Requirement should be greater or less than the OAN; the scale of the Delivery Buffer of Housing, including the impact of predicted future windfall housing.

Objectively Assessed Need for Housing (OAN)

- 1.7.3. The only up-to date and credible evidence on the OAN for Greater Norwich is contained in the Central Norfolk Strategic Housing Market Assessment (SHMA), May 2016.
- 1.7.4. The SHMA identifies that the OAN for Greater Norwich is 39,486 homes between 2015 and 2036. Whilst it is accepted that the process of establishing OAN is an inexact science, there is no clear evidence to suggest that the OAN should be higher or lower than is currently estimated in the SHMA.

1.7.5. Therefore, a Greater Norwich OAN of 39,486 homes between 2015 and 2036 is considered to be the only Reasonable Alternative OAN. It is considered that inventing alternative figures, or simply considering generic higher/lower scenarios, without a clear evidential basis for doing so, would be inherently spurious.

GNLP Housing Requirement

1.7.6. One Reasonable Alternative would be for the Housing Requirement to equal the OAN. The OAN and GNLP Housing Requirement need not necessarily be equal however. Consideration must be given as to whether there are specific constraints or other factors that dictate that the Housing Requirement should be lower than OAN. Similarly, consideration must be given as to whether it would be judicious to increase the Housing Requirement above OAN, for example to deliver unmet need in neighbouring areas.

1.7.7. Establishing the Housing Requirement is a critical element of any plan making process as it provides the baseline housing target, for which allocations will need to be made to ensure it can be delivered. Moreover, it is also the housing target on which five year housing land supply will be judged. Therefore, increasing the housing requirement would not only result in a potentially increased impact from planned development but would also increase the likelihood of a five year land supply deficit, which could result in the ad-hoc release of land for housing, with difficult to predict effects.

Overriding Constraints

1.7.8. The development of the GNLP remains at a relatively early stage. Nonetheless, as part of the early stages of the development various engagement meetings have been held with key stakeholders. This process has not identified any overriding constraints that would indicate that the full OAN could not be met. In addition, the GNLP have undertaken an SA scoping exercise in consultation with the Environmental Bodies, this has also not identified any overriding constraints.

1.7.9. Finally, the Greater Norwich Authorities have been engaged in the development of the Norfolk Strategic Framework (NSF): a non-statutory spatial framework for Norfolk that seeks to establish agreement on strategic planning issues, including overriding constraints to development. Whilst the NSF draft is yet to be published it is understood that no overriding constraints have been identified as part of this process.

Unmet Need from Neighbouring Areas

1.7.10. The Norfolk Strategic Framework (NSF) also considers whether authorities can meet their identified housing needs. Whilst the NSF is yet to be completed there is no current indication that Greater Norwich will need to consider meeting unmet housing need from neighbouring areas. Therefore there is no justification of a reasonable alternative that considers meeting unmet need from neighbouring areas.

Housing Response to the Greater Norwich City Deal

- 1.7.11. The Greater Norwich City Deal seeks to deliver an additional 13,000 jobs by 2031 on top of the 27,000 jobs planned for between 2008 and 2026 in the Joint Core Strategy (JCS). The Central Norfolk SHMA projects that the gross housing response to these additional jobs proposed by the City Deal is 8,361 homes.
- 1.7.12. Because an additional 3,133 are already included within the Greater Norwich OAN in order to adequately respond to Market Signals, the net impact of the housing response to the City Deals would be 5,228 homes.
- 1.7.13. A reasonable alternative would be to include the housing response to the City Deal in the GNLP Housing Requirement.

Housing Delivery Buffer

- 1.7.14. Paragraph 4 of the NPPF states that:
“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change ...”
- 1.7.15. For the purposes of policies that allocate land for housing the most straightforward way to meet this obligation is to identify more land than is required to meet the housing requirement: a housing delivery buffer. Because it would create a plan that is very inflexible, and could well struggle to deliver its housing requirement, it is not considered reasonable for the GNLP to include no housing delivery buffer.
- 1.7.16. There is no clear guidance as to how large a delivery buffer should be. It is however, reasonable to expect that in areas that have historically under-delivered against their housing requirement, such as Greater Norwich, that the buffer would be larger than in areas that have met their targets.
- 1.7.17. Practical experience for the Greater Norwich authorities varies in regards to planning for a delivery buffer within their Local Plan documents. All parts of the development plan included some form of development buffer. Whilst the scale of this buffer varied, taking into account windfall, the buffer generally approached or exceeded 20% of the plan requirement.
- 1.7.18. Consequently it is reasonable to expect that a delivery buffer of at least 20% is a reasonable expectation under the current planning system. Furthermore, given local delivery issues, consideration could be given to whether a higher buffer should be incorporated to further minimise risks of under-delivery and ensure that the plan effectively plans for the aspirations of the Greater Norwich City Deal.

Windfall Housing

- 1.7.19. Windfall housing has continually occurred in addition to planned growth throughout the history of forward plan making. The sources of supply for windfall housing are expected to continue to become available throughout the period of the GNLP.

1.7.20. A straightforward extrapolation of the windfall rates forecast in the Greater Norwich five year housing land supply statement would indicate that windfall housing could provide up-to 5,600 homes over the plan period.

1.7.21. It is reasonable to consider whether projected windfall housing should reduce the scale of housing allocations that should be made, or whether it should be used as an additional deliver buffer. In effect using windfall as an additional buffer is the same as providing a significantly increased delivery buffer. Therefore, in practical terms, these alternatives are the same thing.

Summary of Reasonable Alternatives for Core Housing Matters

1.7.22. Set out below is a summary of the assessment of reasonable alternatives for Core Housing Matters:

1. *The OAN for Greater Norwich is 39,486 homes. There is no evidence to suggest that there are any other reasonable alternatives estimations of OAN.*
2. *The GNLP Housing Requirement could equal OAN, or be OAN plus the net additional homes needed to support City Deal job targets. Both of these options are Reasonable Alternatives.*
3. *There is no justification for the Housing Requirement to be less than OAN, or for the Housing Requirement to include unmet need from surrounding areas. These are therefore an Unreasonable Alternatives.*
4. *To increase the likelihood of delivery, the GNLP must plan for a Housing Delivery Buffer. The delivery buffer should be in the region of 20% of all undelivered housing. Subject to any environmental constraints, a substantially higher delivery buffer, to support delivery, would be a reasonable alternative. A substantially lower buffer is considered unreasonable as it would not provide sufficient certainty of delivery.*
5. *Windfall Housing could form part of the 20% housing delivery buffer, or could form the increase needed to provide for the larger delivery buffer.*

1.7.23. The conclusions set out above are not mutually exclusive. In terms of establishing reasonable alternatives for further assessment it is necessary to consider how the conclusions work in combination. When considered in combination these conclusions in fact lead to four core housing matters reasonable alternatives:

1. *GNLP Housing Requirement is equal to OAN. Delivery Buffer is Approx. 20% OAN. Windfall Housing used as Additional Buffer.*
2. *GNLP Housing Requirement is equal to OAN. Delivery Buffer is Approx. 20% OAN. Housing Allocations discounted to take account of Windfall Housing.*
3. *GNLP Housing Requirement is Equal to OAN plus net Housing Response to City Deal. Delivery Buffer is Approx. 20% OAN. Windfall Housing used as Additional Buffer.*

4. *GNLP Housing Requirement is Equal to OAN plus net Housing Response to City Deal. Delivery Buffer is Approx. 20% OAN. Housing Allocations discounted to take account of Windfall Housing.*

1.8. Distribution of Housing

1.8.1. In order to determine the most appropriate distribution of additional housing a series of conceptual alternatives have been defined. These alternatives consider options for heavy concentration of development in and around Norwich and the Built-up Fringe through to wide ranging dispersal across Greater Norwich, along with other discrete alternatives that lie in between.

1.8.2. The alternatives derived are based on a number of technical decisions and assumptions, which are set out below.

Housing Allocation Requirements

1.8.3. The Distributional Alternatives are based on the following assumptions: the GNLP Housing Requirement will be equal to OAN, not OAN plus City Deal; the Housing Delivery Buffer will equal at least 20% of OAN; the allocation requirement will take full account of housing completion and outstanding housing commitments; the housing allocation requirement would not be discounted to take account of Windfall housing.

Housing numbers for the Greater Norwich Local Plan (GNLP)			
	Source	Overall number	Per annum
A	GNLP Housing Requirement 2015-2036	39,486	1,880
B	Response to City Deal (Net Additional Homes)	5,228	398
C	Total Housing to meet Housing Requirement plus City Deal	44,714	2,129
To be delivered by the following supply:			
D	Housing completions 2015/16	1,782	
E	Housing commitments @ 01/04/2016	36,522	
F	Estimated additional windfall housing commitment 01/04/2016 to 31/03/2017	1,274	
G	Proposed new allocations	8,900	
H	GNLP Housing provision	48,478	
I	Windfall	Up to 5,603	
The GNLP housing provision is 8,992 above the GNLP Housing Requirement. The buffer is therefore <u>23%</u> above OAN. However, this figure could rise to as much as <u>37%</u> if projected levels of windfall development are delivered in full.			

1.8.4. In regards to delivering the housing response to the city deal: 3,133 homes that would contribute to meeting the requirements of the City Deal are already included in the OAN for Greater Norwich. The ample delivery buffer, and

additional windfall housing will effectively ensure that the net additional housing response to the City Deal can be met if the housing market is sufficiently strong.

Existing Housing Completions & Commitment

1.8.5. Housing completions and commitment are fully taken into account within the distributional alternatives. Specifically, 1,728 homes were completed between 31 March 2015 and 1 April 2016. Existing Housing Commitments at 1 April 2016 were calculated to be 36,522. Whilst final year figures are not available at the time of writing, at least 1,274 further homes were added to this commitment between 31 March 2016 and 1 April 2017.

1.8.6. It is unreasonable not to take account of completed dwellings as they exist and have already met part of the identified need for housing. The housing commitment comprises sites with planning permission or sites that have been allocated in the recent past, following independent examination. As such, there can be a high degree of confidence that these sites remain deliverable within the GNLP Plan Period (2015-2036). Consequently, in the absence of evidence indicating the commitments are undeliverable/developable, it is also considered unreasonable not to take account of current housing commitments.

Approach to Defining Distributional Alternatives

1.8.7. The approach to defining distributional alternatives was based on the following staged approach:

- 1. Maximise delivery on previously developed land within Norwich and the built up areas of the fringe parishes**
- 2. Maintain and enhance the vitality of Main Towns and Villages by ensuring an appropriate baseline level of growth**
- 3. Identify alternative distributions for any remaining growth to Fringe Locations, Main Towns, Key Service Centres and Other Villages.**

1.8.8. The justification and rationale behind this stages approach is set out below.

Previously Developed Land within Norwich and the built up areas of the fringe parishes

1.8.9. It is critical that the most efficient use of land is achieved within Greater Norwich, this includes making the best possible use of previously developed land within Norwich and the urban fringe. Sites within Norwich and the Urban Fringe, in addition to being previously developed, will also typically benefit from the best access to services, facilities, public transport (and other sustainable forms of transport) and employment opportunities.

1.8.10. Currently it is estimated that additional capacity on previously developed land equates to 1,500 additional homes in Norwich, with a further 200 in the Broadland part of the Urban Fringe. Whilst these sites appear deliverable/developable, it is considered unreasonable not to include these sites within the baseline for the distributional alternatives. Discounting deliverable/developable previously developed sites in Norwich and the Urban

Fringe would not represent the most efficient use of land result, it would increase the loss of natural resources in the form of land would result in the need to identify additional, less sustainable sites elsewhere.

Maintaining and enhancing the vitality of Main Towns and Villages

1.8.11. As well as making the most efficient use of land, it is also critical that the vitality of Main Towns and Villages is maintained and enhanced. In practical terms this means planning for new development in settlements where there is an appropriate range of services and facilities to support a degree of sustainable development.

1.8.12. In addition, planning for additional development within Main Towns and Villages will support the delivery of the housing needed within the area by ensuring that there is diversity, choice and competition in the market for land. This is particularly relevant given that existing housing commitments are substantially focused in large or strategic sites on the edge of, or near to Norwich and the Urban Fringe.

1.8.13. The scale of growth that is considered to be an appropriate baseline to maintain and enhance the vitality of Main Towns, Key Service Centres and Service and Other Villages is set out in the table below:

Location	Housing Completions 2015/16	Estimated Housing commitment	Proposed Baseline allocation	Total new homes baseline to 2036	Comments
Main Towns (Aylsham, Diss, Wymondham, Harleston, Long Stratton)	272	5901	550	6723	Reflects know local infrastructure and environmental constraints
Key Service Centres	246	2156	450	2402	Reflects know local infrastructure and environmental constraints
Total New Allocations in Main Towns and Key Service Centers			1,000		

1.8.14. It is also proposed that the baseline includes approximately 1,000 homes in services villages that contain a primary school – this is likely to be equivalent to an allocation of 20 homes in every service village (the minimum scale of 20 homes for an allocation will ensure full provision of affordable housing and other small site contributions). In addition, it is proposed that there should be a further 200 homes in other villages with access to a primary school – this is equivalent to approximately 10 allocations of 20 homes in service villages.

1.8.15. It is considered that not providing for an appropriate scale of development in Main Towns, Key Service Centres and Service and Other Villages would be unreasonable. This is because doing so would fail to provide

small-scale housing growth to meet local needs, including for affordable housing, support local services and facilities and make the fullest possible use of infrastructure capacity, in this case primarily primary school capacity.

1.9. Alternative Strategies

1.9.1. Taking account of the assumed baseline growth on PDL and in Main Towns, Key Service Centres, Service Villages and Other Villages, the Alternative Strategies need to accommodate an additional 5,000 new homes. The housing yield from the various baseline sources is set out in the table below:

New Allocation Requirements for Alternative Strategies		
	Source	New Housing Allocations
A	GNL P Proposed New Allocation 2015-2036	8,900
To be delivered by:		
B	Baseline Growth on Previously Developed Land In Norwich and Built Up Areas of Fringe Parishes	1,700
C	Baseline Growth in Main Towns and Key Service Centre	1,000
D	Baseline Growth in Service Villages	1,000
E	Baseline Growth in Other Villages	200
F	Baseline Sub-Total	3,900
Residual Allocations to be identified in Alternative Strategies:		
G	Additional Allocations needed in Alternative Strategies	5,000

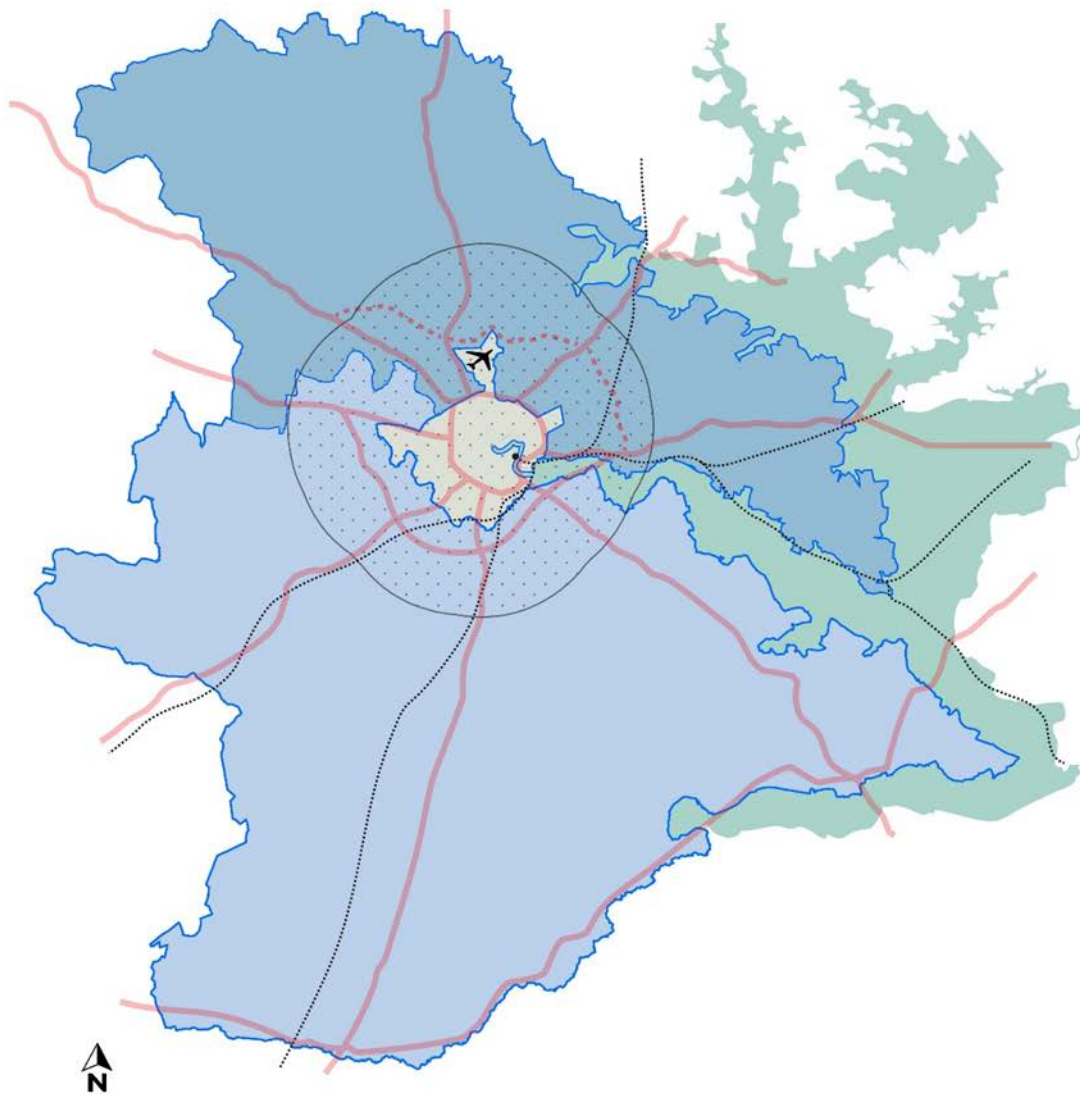
1.9.2. Seven Alternative Strategies have been hypothesized. These approaches either concentrate the additional allocations: as close to Norwich as possible; along the main transport corridors; along the Cambridge-Norwich Tech Corridor; in a widely dispersed number of locations; in a dispersed number of locations supported by a new village; in a hybrid approach of dispersal and urban growth; or in a hybrid approach of dispersal, urban growth and a new village.

1.9.3. Whilst the actual allocation numbers within each approach could vary to some degree, such variation is not considered to constitute a fundamentally different conceptual alternative. Therefore these Alternatives are considered to cover the full range of potential conceptual approaches to distributing additional development across Greater Norwich.





Option 1 Urban concentration (close to Norwich)

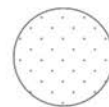



- 1.9.4. The majority of the 48,500 dwellings requirement is already allocated or permitted. The total requirement for new allocations = 8,900.
- 1.9.5. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all Options include a "base position" for new allocations of:
- Norwich 1,500;
 - Broadland brownfield in the urban area 200;
 - Towns and KSCs 1,000;
 - Service villages 1,000;
 - Other villages 200.
- 1.9.6. Therefore there are 5,000 dwellings to find. All Options distribute some of this growth to the urban fringe parishes around Norwich although locations will vary when site options are fully assessed.
- 1.9.7. This option would concentrate all 5,000 additional dwellings close to Norwich in the form of urban extensions or in some of the closest villages.
- 1.9.8. To deliver this option it might be assumed that the number of additional dwellings might be distributed as
- around 1,000 in the North East Growth Triangle
 - around 1,000 in the north west fringe parishes of Horsford, Taverham, Drayton and Hellesdon
 - around 1,000 in the western fringe
 - around 1,500 in South West parishes of Cringleford, Lt Melton and Hethersett;
 - around 500 in distributed among smaller villages or villages slightly more distant such as Horsham St. Faith, Spixworth, Poringland, Swardeston, and Mulbarton.

Urban Concentration (close to Norwich)



Key

-  Norwich City Council (within the GNLP area)
-  Broadland Area (within the GNLP area)
-  South Norfolk Area (within the GNLP area)
-  Broads Authority Area (outside the GNLP area)

-  Urban concentration area
-  A Roads
-  Railways
-  Norwich International Airport

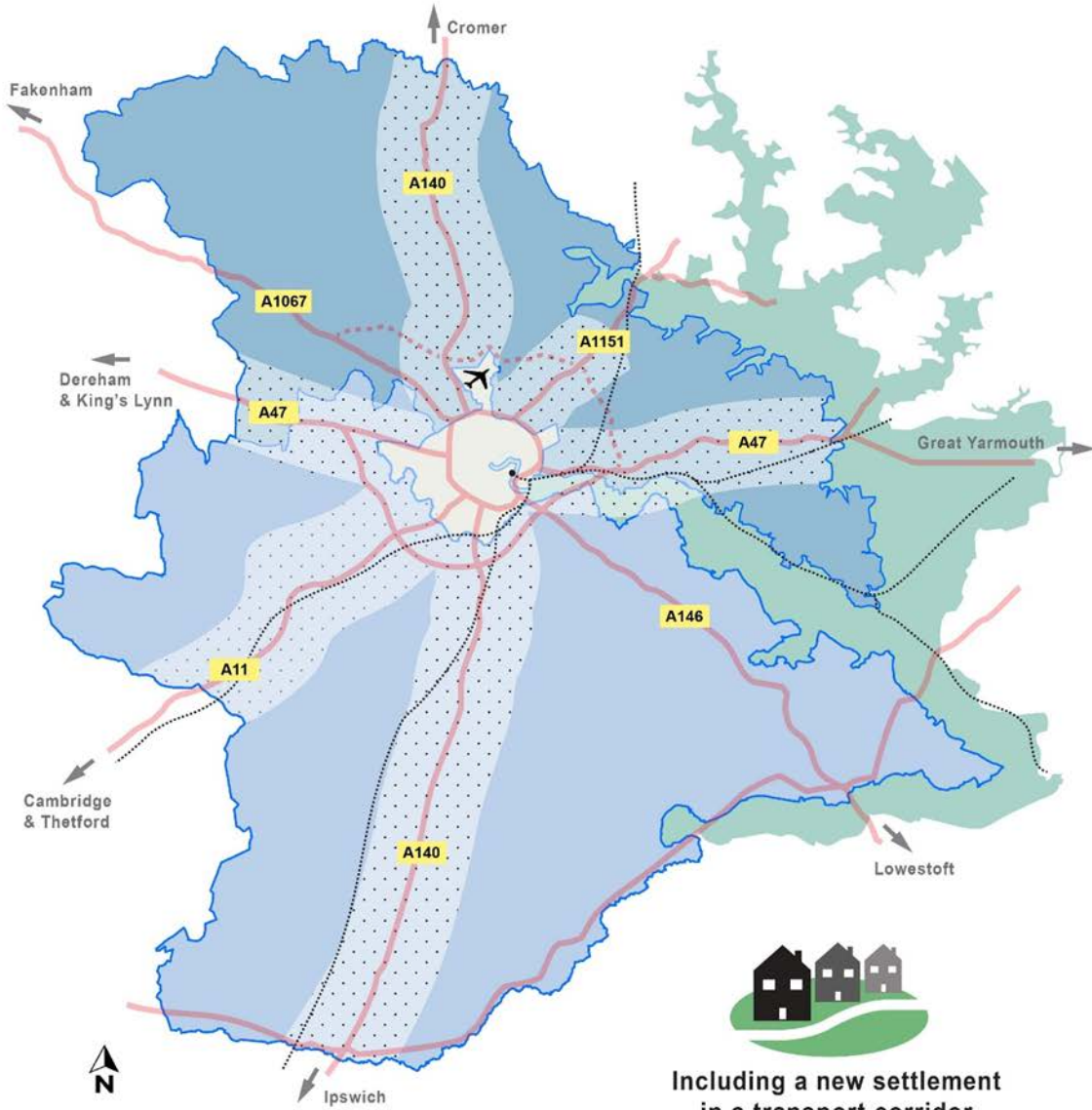


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Transport Corridors





- 1.9.9. The majority of the 48,500 dwellings requirement is already allocated or permitted. The total requirement for new allocations = 8,900.
- 1.9.10. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all Options include a “base position” for new allocations of:
- Norwich 1,500;
 - Broadland brownfield in the urban area 200;
 - Towns and KSCs 1,000;
 - Service villages 1,000;
 - Other villages 200.
- 1.9.11. Therefore there are 5,000 dwellings to find. All Options distribute some of this growth to the urban fringe parishes around Norwich although locations will vary when site options are fully assessed.
- 1.9.12. This Option would concentrate most of the additional 5,000 dwellings in the main transport corridors. There is a degree of overlap with Option 1 as urban fringe locations tend to be well served by transport corridors.
- 1.9.13. To deliver this option it might be assumed that the number of additional dwellings might be distributed as
- around 1,000 in the North East Growth Triangle;
 - around 200 in the north west fringe parishes of Horsford, Taverham, Drayton and Hellesdon;
 - around 500 in the A47/Dereham Rd corridor (West fringe);
 - around 1,500 in A11 corridor (South West fringe parishes of Cringleford, Lt Melton and Hethersett; and Wymondham);
 - around 800 on the A140(S) in Diss and the villages on the A140 (other than Long Stratton where there are significant constraints to growth beyond current commitments);
 - a new settlement on one of the main corridors delivering around 1000 dwellings in the plan period. It would be expected to grow significantly after 2036 with the final scale dependent on the characteristics of the location and access to services;
 - it is assumed that there would be no growth above baseline on the A47(E) reflecting proximity to the Broads and significant existing commitments.





Transport Corridors



Including a new settlement in a transport corridor

Key

-  Norwich City Council (within the GNLP area)
-  Broadland Area (within the GNLP area)
-  South Norfolk Area (within the GNLP area)
-  Broads Authority Area (outside the GNLP area)

-  Transport Corridor
-  A Roads
-  Railways
-  Norwich International Airport



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Cambridge-Norwich Tech Corridor

1.9.14. The majority of the 48,500 dwellings requirement is already allocated or permitted. The total requirement for new allocations = 8,900.

1.9.15. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all Options include a “base position” for new allocations of:

- Norwich 1,500;
- Broadland brownfield in the urban area 200;
- Towns and KSCs 1,000;
- Service villages 1,000;
- Other villages 200.

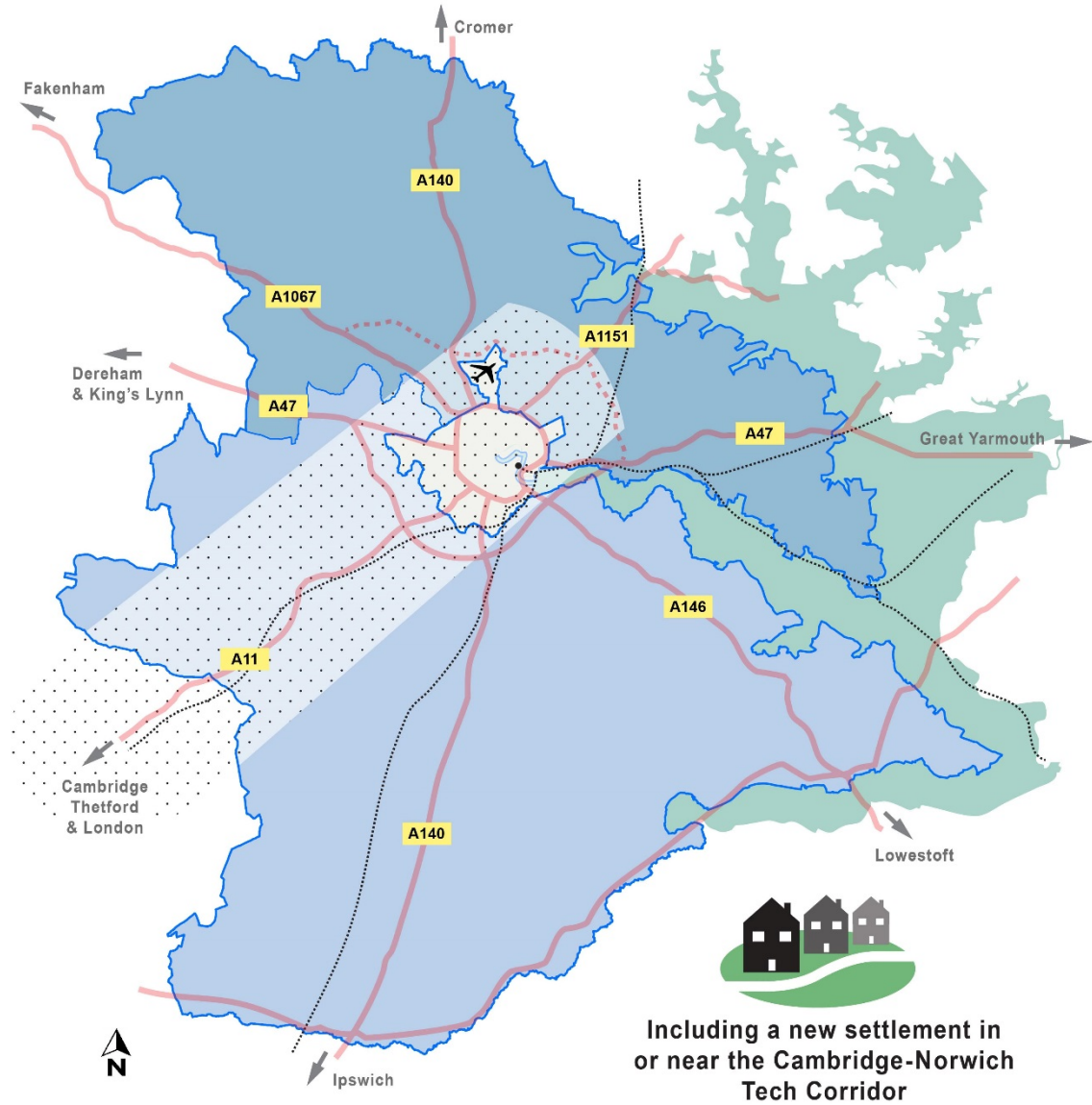
1.9.16. Therefore there are 5,000 dwellings to find. All Options distribute some of this growth to the urban fringe parishes around Norwich although locations will vary when site options are fully assessed.

1.9.17. The Cambridge Norwich Tech Corridor initiative identifies the potential of this area for economic growth. The A11 and adjacent Norwich Cambridge railway line lie at the heart of the corridor. The option concentrates most of the 5,000 dwellings in the A11 corridor and near to the main economic assets associated with it such as Norwich Research Park (NRP) and Hethel;

1.9.18. To deliver this option it might be assumed that the 5,000 additional dwellings could be distributed as





- around 300 in the north west fringe parishes of Horsford, Taverham, Drayton and Hellesdon Providing a degree of growth in part of the Broadland urban fringe;
- around 1,000 in the West fringe – which lies between the Norwich Research Park and the Food Enterprise Zone (FEZ) area;
- around 1,500 in existing settlements on the A11 corridor (South West fringe parishes of Cringleford, Lt Melton and Hethersett; and Wymondham);
- a new settlement in the A11 corridor delivering around 1000 dwellings in the plan period. It would be expected to grow significantly after 2036 with the final scale dependent on the characteristics of the location and access to services;
- around 200 at Hingham which is a key service centre reasonably close to the A11 corridor and with some history of tech industries;
- around 500 in Diss and nearby villages.

Supporting the Cambridge-Norwich Tech Corridor



Including a new settlement in or near the Cambridge-Norwich Tech Corridor

Key

-  Norwich City Council (within the GNLP area)
-  Broadland Area (within the GNLP area)
-  South Norfolk Area (within the GNLP area)
-  Broads Authority Area (outside the GNLP area)



Cambridge-Norwich Tech Corridor

-  A Roads
-  Railways
-  Norwich International Airport

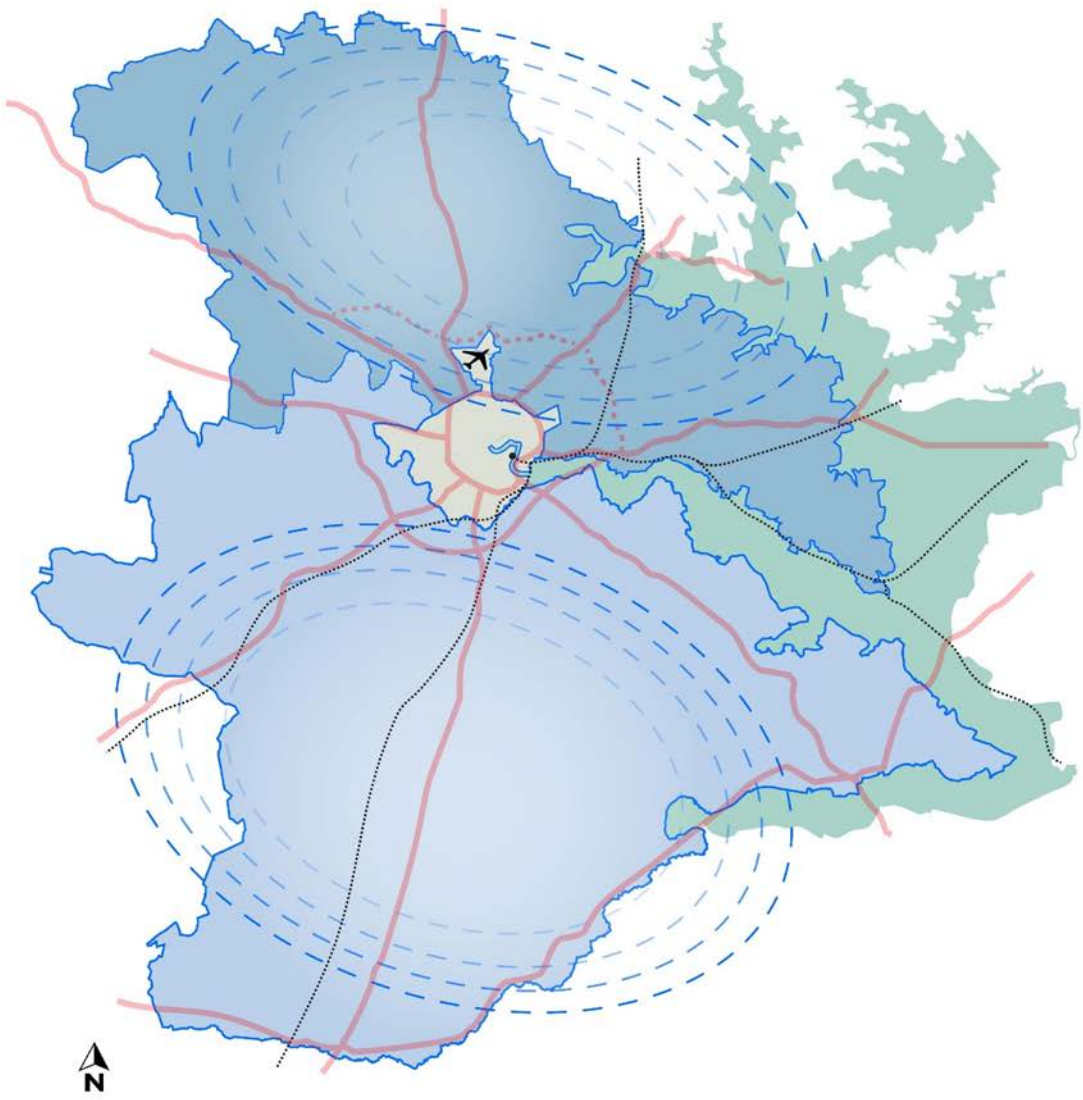


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Dispersal

- 1.9.19. The majority of the 48,500 dwellings requirement is already allocated or permitted. The total requirement for new allocations = 8,900.
- 1.9.20. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all Options include a "base position" for new allocations of:
- Norwich 1,500;
 - Broadland brownfield in the urban area 200;
 - Towns and KSCs 1,000;
 - Service villages 1,000;
 - Other villages 200.
- 1.9.21. Therefore there are 5,000 dwellings to find. All Options distribute some of this growth to the urban fringe parishes around Norwich although locations will vary when site options are fully assessed.
- 1.9.22. This Option provides higher levels of dispersal to villages while retaining some limited growth in the Norwich fringe parishes and the A11 corridor
- 1.9.23. To deliver this option it might be assumed that the 5,000 additional dwellings could be distributed as
- around 300 in the north and north west fringe parishes of Horsham and Newton St Faiths, Horsford, Taverham, Drayton and Hellesdon. Providing a degree of growth in part of the Broadland urban fringe;
 - around 500 dwellings in the west fringe;
 - around 500 in existing settlements on the A11 corridor (South West fringe parishes of Cringleford, Lt Melton and Hethersett; and Wymondham);
 - around 400 distributed across 4 towns/KSCs in South Norfolk (Diss, Harleston, Hingham and Loddon);
 - 3,300 additional dwellings in Service and Other Villages (making a total of 4,500 in these settlements). The distribution of growth between these villages would be dependent on a range of factors including availability of sites, location, access to services, and deliverability.

Dispersal



- Key**
- Norwich City Council (within the GNLP area)
 - Broadland Area (within the GNLP area)
 - South Norfolk Area (within the GNLP area)
 - Broads Authority Area (outside the GNLP area)

- Dispersal
- A Roads
- Railways
- ✈ Norwich International Airport



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Dispersal Plus One New Settlement

1.9.24. The majority of the 48,500 dwellings requirement is already allocated or permitted. The total requirement for new allocations = 8,900.

1.9.25. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all Options include a "base position" for new allocations of:

- Norwich 1,500;
- Broadland brownfield in the urban area 200;
- Towns and KSCs 1,000;
- Service villages 1,000;
- Other villages 200.

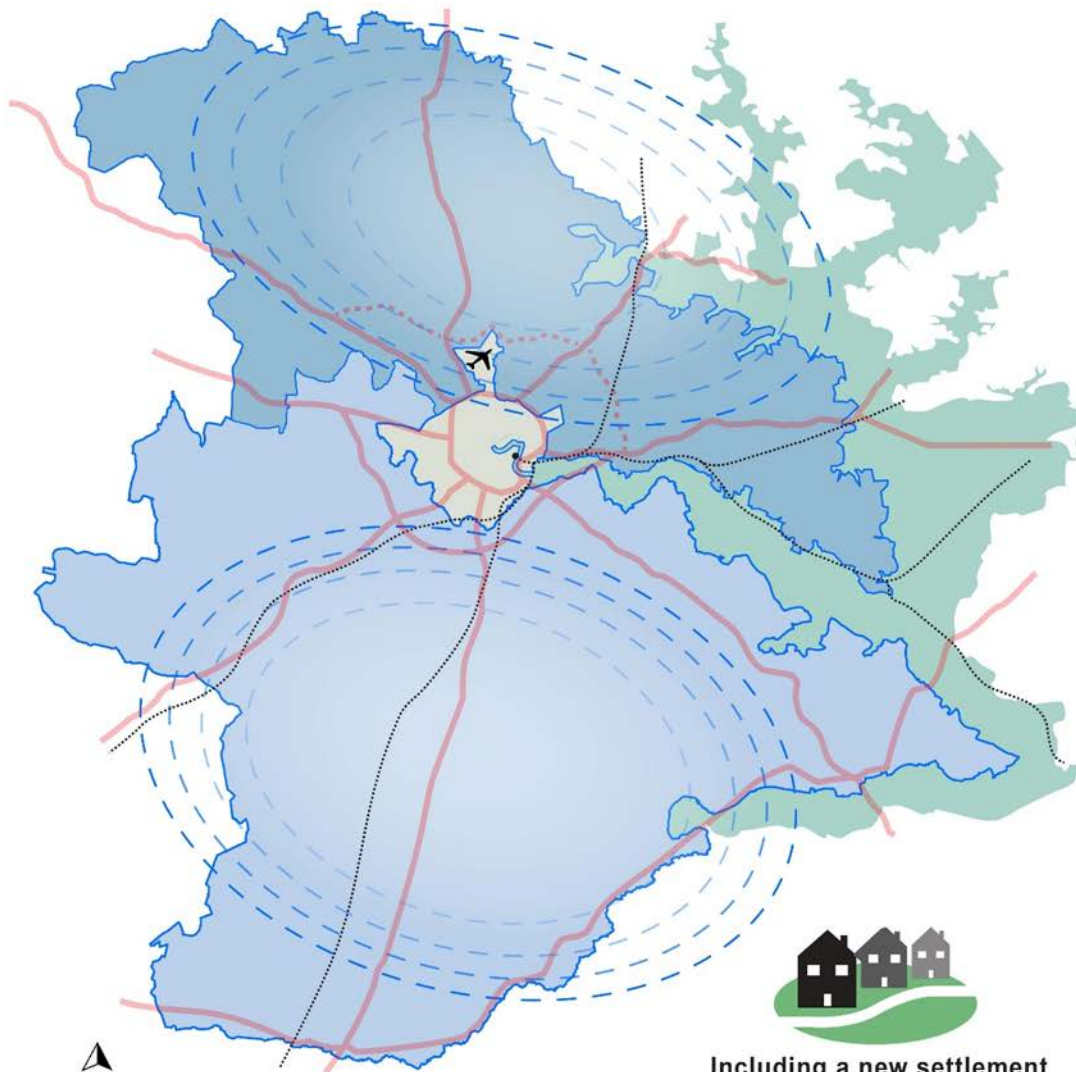
1.9.26. Therefore there are 5,000 dwellings to find. All Options distribute some of this growth to the urban fringe parishes around Norwich although locations will vary when site options are fully assessed.

1.9.27. This Option would be very similar to Option 4 but would divert some of the growth dispersed to villages and concentrate it in a new settlement

1.9.28. To deliver this option it might be assumed that the 5,000 additional dwellings could be distributed as





- around 300 in the north and north west fringe parishes of Horsham and Newton St Faiths, Horsford, Taverham, Drayton and Hellesdon. Providing a degree of growth in part of the Broadland urban fringe;
- around 500 dwellings in the west fringe;
- around 500 in existing settlements on the A11 corridor (South West fringe parishes of Cringleford, Lt Melton and Hethersett; and Wymondham);
- around 400 distributed across 4 towns/KSCs in South Norfolk (Diss, Harleston, Hingham and Loddon);
- 2,300 additional dwellings in Service and Other Villages (making a total of 3,500 in these settlements). The distribution of growth between these villages would be dependent on a range of factors including availability of sites, location, access to services, and deliverability.
- a new settlement somewhere in the area delivering around 1000 dwellings in the plan period. It would be expected to grow significantly after 2036 with the final scale dependent on the characteristics of the location and access to services;

Dispersal plus new Settlement



**Including a new settlement
in a transport corridor**

Key

-  Norwich City Council (within the GNL area)
-  Broadland Area (within the GNL area)
-  South Norfolk Area (within the GNL area)
-  Broads Authority Area (outside the GNL area)



-  A Roads
-  Railways
-  Norwich International Airport



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Dispersal plus Urban Growth

1.9.29. The majority of the 48,500 dwellings requirement is already allocated or permitted. The total requirement for new allocations = 8,900.

1.9.30. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all Options include a "base position" for new allocations of:

- Norwich 1,500;
- Broadland brownfield in the urban area 200;
- Towns and KSCs 1,000;
- Service villages 1,000;
- Other villages 200.

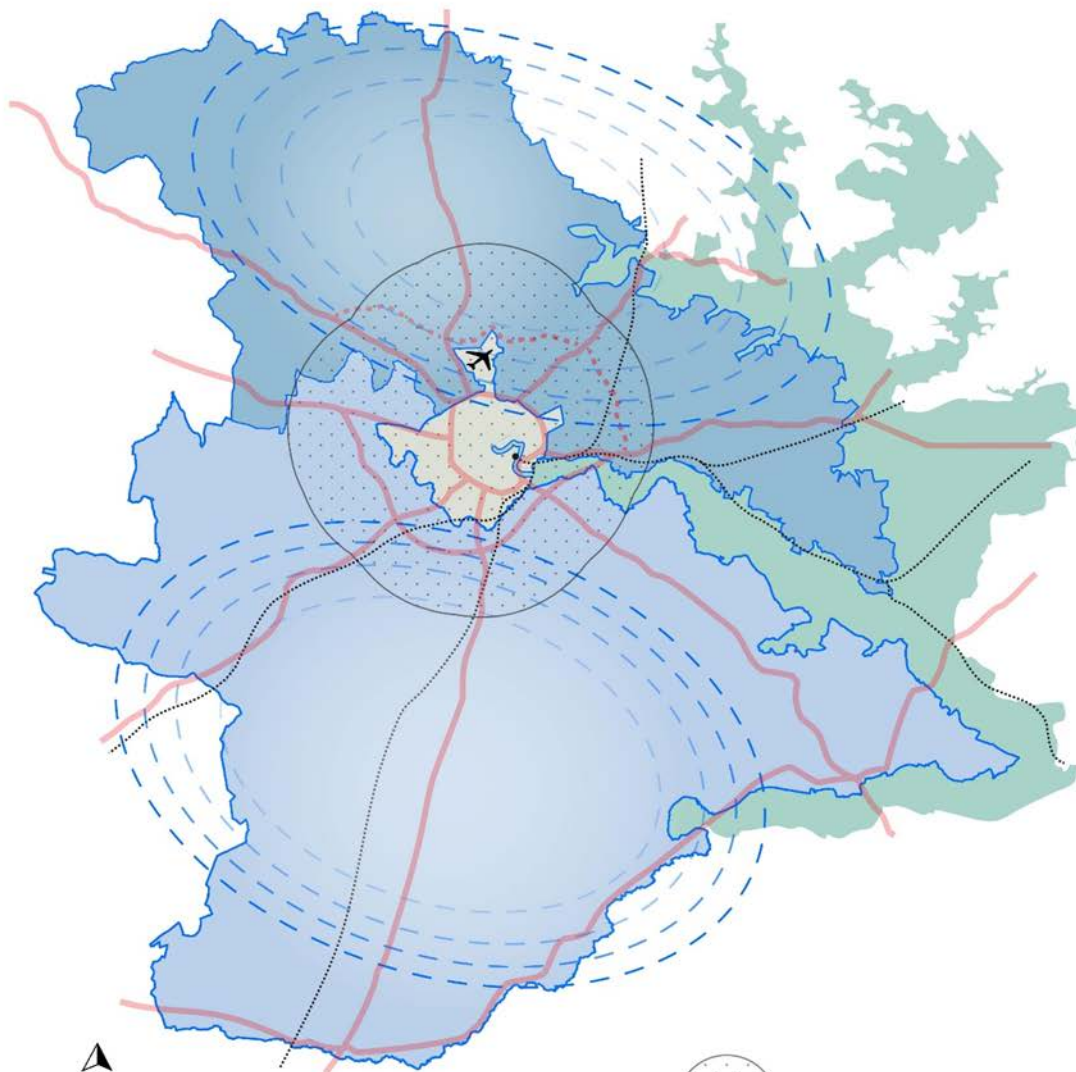
1.9.31. Therefore there are 5,000 dwellings to find. All Options distribute some of this growth to the urban fringe parishes around Norwich although locations will vary when site options are fully assessed.

1.9.32. This Option would be similar to Option 5 but would locate more growth in the urban fringe (within the north east growth triangle) rather than in a new settlement.





1.9.33. To deliver this option it might be assumed that the 5,000 additional dwellings could be distributed as

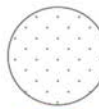




- around 1,000 in the North East Growth Triangle;
- around 300 in the north and north-west fringe parishes of Horsham and Newton St Faiths, Horsford, Taverham, Drayton and Hellesdon. Providing a degree of growth in part of the Broadland urban fringe;
- around 500 dwellings in the west fringe;
- around 500 in existing settlements on the A11 corridor (South West fringe parishes of Cringleford, Lt Melton and Hethersett; and Wymondham);
- around 400 distributed across 4 towns/KSCs in South Norfolk (Diss, Harleston, Hingham and Loddon);
- 2,300 additional dwellings in Service and Other Villages (making a total of 3,500 in these settlements). The distribution of growth between these villages would be dependent on a range of factors including availability of sites, location, access to services, and deliverability.

Dispersal plus Urban Growth



Key

-  Norwich City Council (within the GNLP area)
-  Broadland Area (within the GNLP area)
-  South Norfolk Area (within the GNLP area)
-  Broads Authority Area (outside the GNLP area)

-  Urban concentration area
-  Dispersal
-  A Roads
-  Railways
-  Norwich International Airport

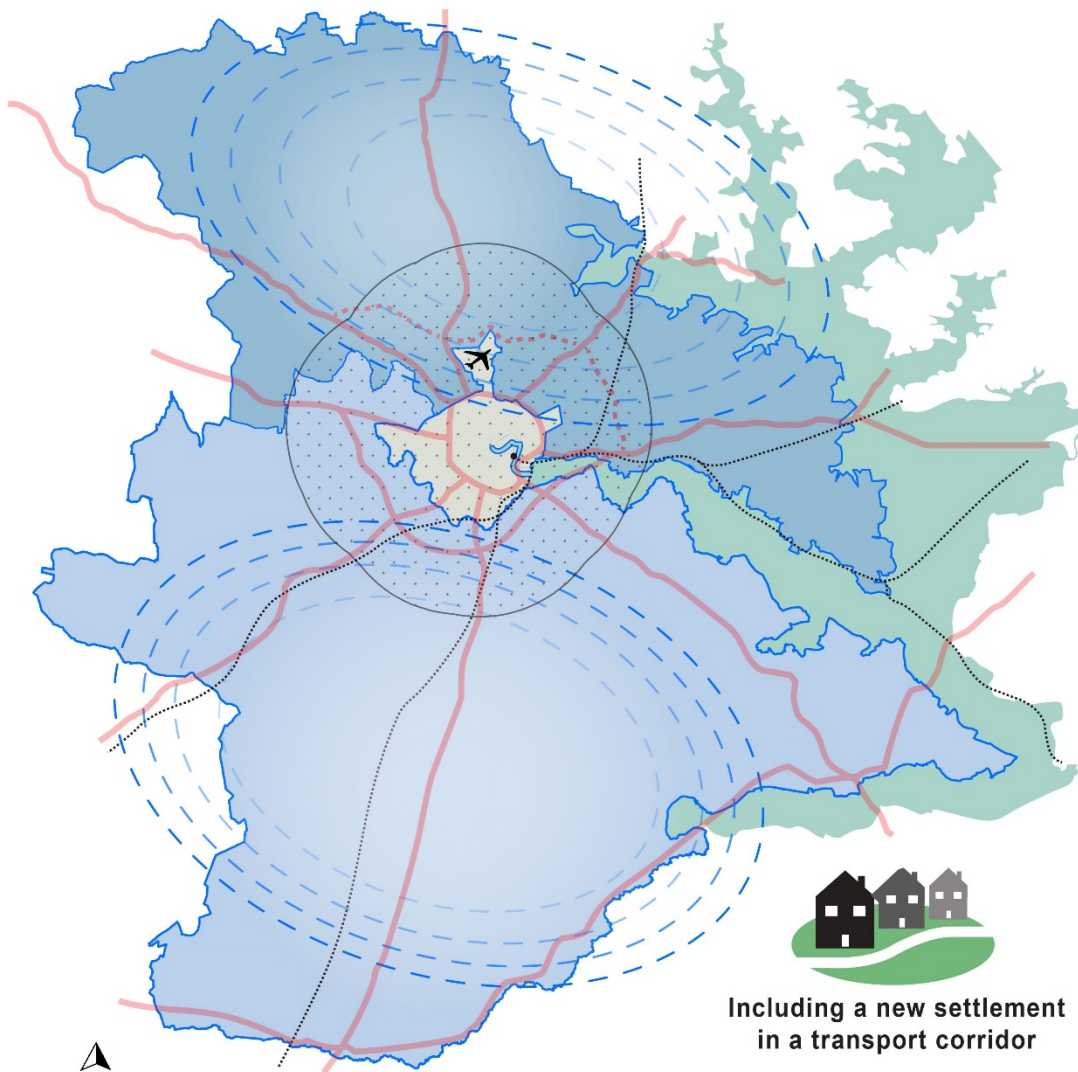


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Dispersal plus Urban Growth and a New Settlement

- 1.9.34. The majority of the 48,500 dwellings requirement is already allocated or permitted. The total requirement for new allocations = 8,900.
- 1.9.35. In order to ensure that urban brownfield sites are maximised and rural needs are addressed, all Options include a "base position" for new allocations of:
- Norwich 1,500;
 - Broadland brownfield in the urban area 200;
 - Towns and KSCs 1,000;
 - Service villages 1,000;
 - Other villages 200.
- 1.9.36. Therefore there are 5,000 dwellings to find. All Options distribute some of this growth to the urban fringe parishes around Norwich although locations will vary when site options are fully assessed.
- 1.9.37. To deliver this option it might be assumed that the 5,000 additional dwellings could be distributed as
- around 1,000 in the North East Growth Triangle;
 - around 300 in the north and north-west fringe parishes of Horsham and Newton St Faiths, Horsford, Taverham, Drayton and Hellesdon. Providing a degree of growth in part of the Broadland urban fringe;
 - around 500 dwellings in the west fringe;
 - around 500 in the South West fringe parishes (Cringleford, Lt Melton and Hethersett);
 - around 400 distributed across 5 towns/KSCs in South Norfolk (Wymondham, Diss, Harleston, Hingham and Loddon);
 - 1,300 additional dwellings in Service and Other Villages (making a total of 2,500 in these settlements). The distribution of growth between these villages would be dependent on a range of factors including availability of sites, location, access to services, and deliverability.
 - a new settlement somewhere in the area delivering around 1000 dwellings in the plan period. It would be expected to grow significantly after 2036 with the final scale dependent on the characteristics of the location and access to services;





Dispersal, Urban Growth & New Settlement

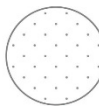






**Including a new settlement
in a transport corridor**



Key

-  Norwich City Council (within the GNL P area)
-  Broadland Area (within the GNL P area)
-  South Norfolk Area (within the GNL P area)
-  Broads Authority Area (outside the GNL P area)

-  Urban concentration area
-  Dispersal
-  A Roads
-  Railways
-  Norwich International Airport



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Summary of Alternative Distributions

1.9.38. Set out below is a summary of the key assumptions and Reasonable Alternatives for the Distribution of Development.

Assumptions:

1. The GNLN Housing Requirement will be equal to OAN, not OAN plus City Deal;
2. The Housing Delivery Buffer will equal at least 20% of OAN;
3. The additional allocation requirement will take full account of housing completion and outstanding housing commitments;
4. the housing allocation requirement would not be discounted to take account of Windfall housing.

1.9.39. The net result of the above assumptions is that the GNLN Alternative Distributions will need to identify allocations for a further 8,900 dwellings.

Reasonable Alternatives:

1. The use of deliverable/developable previously developed land (PDL) within Norwich and the urban fringe will be maximized, to do otherwise would be unreasonable. PDL in these areas is forecast to contribute 1,700 additional homes.
2. To maintain and enhance the vitality of Main Towns, Key Service Centres and Service and Other Villages a baseline level of growth within these settlements will form part of all distribution alternatives, to do otherwise would be unreasonable. The appropriate baseline to maintain and enhance vitality of these locations is calculated to be 2,200 additional homes.
3. Taking account of the baseline supply, residual allocation requirement for the GNLN Distribution Alternatives is 5,000 dwellings.
4. There are seven conceptual alternatives available to the GNLN. These cover the range of reasonable distribution alternatives. Specifically these alternatives are:
 - a. Urban Concentration
 - b. Transport Corridors
 - c. Cambridge – Norwich Tech Corridor
 - d. Dispersal
 - e. Dispersal Plus One New Settlement
 - f. Dispersal plus Urban Growth
 - g. Dispersal plus Urban Growth and a New Settlement

2. Evaluating Reasonable Alternatives

2.1. Evaluated within this section are the “significant effects” on the baseline / likely future baseline of the Reasonable Alternatives relating to the matters of: Core Housing Matters; and, the Conceptual Reasonable Alternative Distributions of Development.

- 2.2. Whilst all reasonable steps are taken to evaluate significant effects accurately, predicting such effects is intrinsically difficult due to the broad nature of the alternatives under consideration, particularly in regards alternatives considering distribution, and uncertainties about the likely future baseline in regards to the scale and distribution of further development in the “no plan” alternative.
- 2.3. Therefore a degree of caution has been taken in identifying significant effects, where assumptions have been made every effort has been taken to set these assumptions out clearly in the accompanying explanation.
- 2.4. In some instances it has not been possible to conclude that there will be a significant effect on the baseline or that there are differing effects on the baseline between alternatives. However, it may still be possible to differentiate between alternatives in relative terms. This is set out in the table and the accompanying explanatory text.

2.5. Core Housing Matters

- 2.5.1. The policy alternatives considered in relation to the Core Housing Matters are those that are set out under 5.7.23. The explanation of how those alternatives were derived is also contained within that section.

Reasonable Alternative	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
1) GNLP Housing Requirement is equal to OAN. Delivery Buffer is Approx. 20% OAN. Windfall Housing used as Additional Buffer.															
2) GNLP Housing Requirement is equal to OAN. Delivery Buffer is Approx. 20% OAN. Housing Allocations discounted to take account of Windfall Housing															
3) GNLP Housing Requirement is Equal to OAN plus net Housing Response to City Deal. Delivery Buffer is Approx. 20% OAN. Windfall Housing used as Additional Buffer.												?			
4) GNLP Housing Requirement is Equal to OAN plus net Housing Response to City Deal. Delivery Buffer is Approx. 20% OAN. Housing Allocations discounted to take account of Windfall Housing												?			
Better Performing ← → Worse Performing															
<ol style="list-style-type: none"> 1. Minimise air, noise and light pollution to improve wellbeing 2. Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change 3. Protect and enhance the area's biodiversity and geodiversity assets, and expand the provision of green infrastructure 4. Promote efficient use of land, whilst respecting the variety of landscape types in the area 5. Ensure that everyone has good quality housing of the right size and tenure to meet their needs 6. Maintain and improve the quality of life of residents 7. To reduce deprivation 8. To promote access to health facilities and promote healthy lifestyles 9. To reduce crime and the fear of crime 								<ol style="list-style-type: none"> 10. To promote access to education and skills training and support increased educational attainment. 11. Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents, and maintain and enhance town centres 12. Reduce the need to travel and promote the use of sustainable transport modes 13. Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment. 14. Minimise waste generation, promote recycling and avoid sterilisation of mineral resources. Remediate contaminated land and minimise the use of the best and most versatile agricultural land. 15. Maintain and enhance water quality and ensure the most efficient use of water. 							

SA Objective	Discussion of significant effects, and relative merits of alternatives.
<p>SA1: Minimise air, noise and light pollution to improve wellbeing.</p>	<p>All housing development, unless “car free”, will inevitably generate additional trips locally as new residents move into the area. Therefore, because all of the Core Housing Alternatives would result in the allocation of further land for housing development, all alternatives would give rise to increased air and noise pollution, disruption to amenity and potential secondary health impacts locally. Consequentially, all alternatives are predicted to have a significant negative impact on the baseline.</p> <p>As the identified impact is directly related to the scale of development a straightforward reading of the alternatives would indicate that Alternative 2 is likely to have the least impact, as it would release the least land for development. Alternative 3 would release the most land and have the greatest impact. Alternatives 1 and 4 would be broadly similar in term of the land release, but alternative 4 would carry the greatest risk of further land releases on 5 year land supply grounds. Thus in relative terms alternative 4 is considered to have more impact than alternative 1.</p> <p>It is possible, maybe even likely, that, above a certain level, increasing the scale of land allocated for housing would have no impact on actual housing delivery i.e. availability of land would no longer be a constraint to development and the ability of the market to deliver would be the sole determinant of housing completions.</p>
<p>SA2: Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change.</p>	<p>The principal concern in relation to climate change mitigation will be the degree to which new development supports efforts to reduce car dependency and bring about modal shift to less polluting forms of transport, walking and cycling. Other consideration will relate to the extent to which development would support low carbon energy or buildings are energy efficient.</p> <p>In terms of adaptation, key issues will include flood risk concerns and green infrastructure. These issues are however primarily related to the distribution of development and thematic policies rather than the consideration of core housing matters. Therefore all alternatives are considered to have no significant impact on the baseline.</p>
<p>SA3: Protect and enhance the area’s biodiversity and geodiversity assets, and expand the provision of green infrastructure.</p>	<p>It is likely reasonable to assume that growth on the scale proposed within all of the alternatives would lead to direct effects on land that has some biodiversity importance, or land that contributes to the functioning of wider “ecological networks”. There may also be some indirect effects associated with growth, such as recreational impact on ecologically important sites. Consequently it is considered that all alternatives are likely to result in a significant negative impact on the baseline.</p> <p>On the basis of the above, it is also arguably the case that higher scales of development are likely to lead to greater impact than lower scales of growth. Consequently, alternative</p>

	<p>2 is likely to have the least impact, as it would release the least land for development. Alternative 3 would release the most land and have the greatest impact. Alternatives 1 and 4 would be broadly similar in term of the land releases and therefore it is not possible to differentiate between them.</p>
<p>SA4: Promote efficient use of land, whilst respecting the variety of landscape types in the area</p>	<p>The vast majority of the additional growth that will be planned for within the GNLP will be on greenfield land that currently contributes to landscape character of different types. It is therefore suggested that all alternatives result in a significant negative impact on the baseline.</p> <p>The precise impact of the growth in terms of the efficient use of land or on particular landscape sensitivities will depend upon the allocations made. Therefore it is not possible to differentiate between the alternatives in this regard.</p>
<p>SA5: Ensure that everyone has good quality housing of the right size and tenure to meet their needs</p>	<p>In theory all of the alternatives would be capable of providing the housing needed, including the provision of the necessary affordable housing. Therefore all alternatives are considered to result in a significant positive impact on the baseline.</p> <p>A straight forward assessment might conclude that the alternative which plans for the most housing would perform best in relative terms, as it would provide the most housing. However, given that alternatives 1, 3 and 4 all positively plan for a potential level of development that is in excess of 20% above the OAN, each alternative is clearly capable of meeting needs. Whilst alternative 2 also plans for a level of growth that is 20% above OAN, a substantial proportion of this (in excess of 50% of the buffer) would be in the form of Windfall housing. Current Windfall projections are based on past trends and whilst legitimate over the short term they are less certain over the longer term. Therefore, alternative 2 is considered to offer less certainty of delivery than the other alternatives. It is subsequently considered to perform worse in relative terms.</p>
<p>SA6: Maintain and improve the quality of life of residents</p>	<p>It is considered likely that all alternatives would result in development in locations that are currently of high amenity value, or environmental quality. It is likely also that it would be possible to create high quality developments within these areas.</p> <p>Important to consider also is the impact on the “quality of life of residents” as perceived by existing residents. Many people may well feel that new development will have a detrimental impact on their quality of life. Others could, of course, see that development will bring with it some benefit.</p> <p>On the basis of the above, it is concluded that the alternatives on Core Housing Matters will have no significant effect on the baseline. Nor is it possible to differentiate between the alternatives in relation to this objective.</p>
<p>SA7: To reduce deprivation</p>	<p>Development may stimulate or support regeneration of deprived areas. The provision of</p>

	<p>affordable housing will also help to address deprivation to some degree.</p> <p>Whilst the alternatives would all provide for affordable housing, it is the distribution and form of development that would dictate if the extent to which development would stimulate or support regeneration. Consequentially it is considered that the alternatives would have no significant impact on the baseline. Nor is it possible to differentiate between the alternatives in relation to this objective.</p>
SA8: To promote access to health facilities and promote healthy lifestyles	<p>If well planned, development can contribute to, or create, mixed and inclusive communities that are supported by a range of services and facilities, including green infrastructure.</p> <p>This impact of development on these matters are however related to distribution and choice of site rather than pure housing numbers. Therefore, it is considered that the alternatives would have no significant impact on the baseline. Nor is it possible to differentiate between the alternatives in relation to this objective.</p>
SA9: To reduce crime and the fear of crime	<p>If well planned, development can contribute to, or create, mixed and inclusive communities that are designed taking into account guidance such as “safer by design”.</p> <p>This impact of development on these matters are however not directly related to decision above the scale of housing allocation. Therefore, it is considered that the alternatives would have no significant impact on the baseline. Nor is it possible to differentiate between the alternatives in relation to this objective.</p>
SA10: To promote access to education and skills training and support increased educational attainment.	<p>It is assumed that housing will be distributed so as to make effective use of existing school capacity, or be located in areas where additional capacity can be made available. There is no evidence that there are any fundamental constraints to education provision that are directly related to decisions above the scale of housing allocation.</p> <p>As such, it is considered that the alternatives would have no significant impact on the baseline. Nor is it possible to differentiate between the alternatives in relation to this objective.</p>
SA11: Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents, and maintain and enhance town centres	<p>All of the alternatives plan for a sufficient number of homes to accommodate the workers needed to realise the East of England Forecasting Models projections for jobs growth across Greater Norwich, and also to provide for around 37% of the additional homes needed to support the Greater Norwich City Deal.</p> <p>Therefore all alternatives are considered to result in a significant positive impact on the baseline.</p> <p>Alternative 3 proactively plans for all of the additional homes needed to support the City Deal. In broad terms, alternatives 1 and 4 would provide for all the additional homes</p>

	<p>needed to support the City Deal, assuming that Windfall housing projections are largely fully realised. Alternative 2 would only plan for 37% of the homes needed to support the City Deal, assuming that Windfall housing projections are largely fully realised.</p> <p>Therefore, in relative terms alternative 3 is considered to perform best, with alternatives 1 and 4 to perform similarly, but less well than 3. Alternative 2 performs worst as it supports the least economic growth, and its contribution to meeting the Housing Requirements of the City Deal is largely dependent on the continued delivery of Windfall housing, which is less certain over the longer term.</p>
<p>SA12: Reduce the need to travel and promote the use of sustainable transport modes</p>	<p>In the context of housing growth, reducing the need to travel and promoting the use of sustainable modes of transport are matters that are expected to be principally aligned to the strategy for the distribution of housing. Additional development may generate/justify investment that would result in improved public transport services and sustainable transport infrastructure which would provide wider sustainable transport benefits. Conversely, widely dispersed growth could foster car dependency.</p> <p>Therefore, it is not possible to conclude that the alternatives would have a significant impact on the baseline.</p> <p>However, alternatives 3 and 4 would result in a GNLP housing requirement that is significantly above OAN, and linked to the realisation of City Deal aspirational jobs growth. If such aspirational jobs growth does not occur then there will insufficient demand for the planned housing. In this scenario it is likely that housing delivery would fall behind the requirement, with the distinct possibility of a lack of five year housing land supply. This may lead to additional, unplanned sites being released for development that may not be as well related to sustainable transport as planned sites. Therefore there is an increased risk that alternatives 2 and 4 would result in development that is more poorly served by sustainable transport.</p>
<p>SA13: Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area’s historic built environment.</p>	<p>The vast majority of the additional growth that will be planned for within the GNLP will be on greenfield land. It is likely that some of this would have an impact on the historic environment, heritage assets or cultural heritage. It is therefore suggested that all alternatives result in a significant negative impact on the baseline.</p> <p>The precise impact of the growth in terms of the historic environment will depend upon the allocations made. Therefore it is not possible to differentiate between the alternatives in this regard.</p>
<p>SA14: Minimise waste generation, promote recycling and avoid sterilisation of mineral resources. Remediate contaminated land and minimise the use of the best and most versatile agricultural land.</p>	<p>The vast majority of the additional growth that will be planned for within the GNLP will be on greenfield land. However, the impact of the growth in terms of this objective is expected to relate to the location of the allocations made. Therefore, it is not possible to conclude that the alternatives would have a significant impact on the baseline. Nor is it</p>


	possible to differentiate between the alternatives in relation to this objective.
<p>Maintain and enhance water quality and ensure the most efficient use of water.</p>	<p>The supply and disposal of water, and related water quality matters, are key issues for the GNLP. The vast majority of the housing development that needs to be planned for is contained within existing planning permissions and allocations. There is good evidence to suggest that these developments can be delivered without any significant impact on water quality.</p> <p>Further growth will place an additional burden on water supply and disposal infrastructure. Early engagement with AWS, EA and NE have not identified any fundamental water quality constraint to further development. However, detailed evidence on this issue is not currently available therefore it is not possible to conclude that the alternatives would have a significant impact on the baseline.</p> <p>A straight forward analysis might however suggest that allocations alternatives that release less land for housing would be less likely to be impactful than those that release more land for housing.</p> <p>Particularly in terms of waste water disposal, and its impact on water quality distribution of housing further away from Norwich is likely to be significant, as foul water will be disposed of through local treatment works which have their own particular issues in terms of their volumetric capacity and required treatment standards.</p>

2.6. Assessment Summary

- 2.6.1. Alternatives 3 and 4 would establish a Plan Requirement that is substantially above OAN, and one that is only deliverable if the significant increase in jobs, as envisaged by the aspirational City Deal actually occurs. This would create a situation where the authorities are much more likely to suffer from a theoretical, but actually non-existent, five year land supply deficit. This would create uncertainties in relation to objective 12, as well as increasing the impact on the baseline under objectives 1 and 3. There is therefore good reason to consider that these alternatives should not be preferred.
- 2.6.2. Alternatives 1 and 2 avoid the situation set out above by making the Plan Requirement equivalent to OAN, and thus relating any calculation of five year land supply to the projections of demographic change as amended to take account of market forces and to balance jobs and homes based on trends and economic forecasts, in accordance with the National Planning Practice Guidance (NPPG).
- 2.6.3. However, whilst a straight forward assessment suggests that alternative 2 would perform better in terms of air quality and climate change related to emissions, it would also include a significantly lower delivery buffer, which is heavily reliant on windfall housing projections being delivered. Given the delivery challenges experienced locally this presents a significant risk to housing delivery. Alternative 2 also would not provide for more than 37% of the City Deal under any circumstances. This could restrict the economic growth potential of the area. Alternative 1 includes a high delivery buffer, giving more certainty of delivery, and would support a minimum of 37% of the homes needed to support the City Deal with the potential to support the whole housing response if Windfall Housing is substantially delivered. Therefore, it is considered that there is good reason to prefer alternative 1 above alternative 2.

2.7. Reasonable Alternative Distributions of Development

- 2.7.1. The policy alternatives considered in relation to the Distribution of Development and the explanation of how those alternatives were derived are set out above.

Reasonable Alternative	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
1) Urban Concentration (close to Norwich)	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Light Green	Light Green
2) Transport Corridors	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Light Green	Light Green
3) Cambridge – Norwich Tech Corridor	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Dark Green	Light Green	Light Green
4) Dispersal	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green
5) Dispersal Plus One New Settlement	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green
6) Dispersal and Urban Growth	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green
7) Dispersal Urban Growth New Settlement	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green
<p>Better Performing ←  → Worse Performing</p>															
<ol style="list-style-type: none"> 1. Minimise air, noise and light pollution to improve wellbeing 2. Continue to reduce carbon emissions, adapting to and mitigating against the effects of climate change 3. Protect and enhance the area's biodiversity and geodiversity assets, and expand the provision of green infrastructure 4. Promote efficient use of land, whilst respecting the variety of landscape types in the area 5. Ensure that everyone has good quality housing of the right size and tenure to meet their needs 6. Maintain and improve the quality of life of residents 7. To reduce deprivation 8. To promote access to health facilities and promote healthy lifestyles 9. To reduce crime and the fear of crime 								<ol style="list-style-type: none"> 10. To promote access to education and skills training and support increased educational attainment. 11. Encourage economic development covering a range of sectors and skill levels to improve employment opportunities for residents, and maintain and enhance town centres 12. Reduce the need to travel and promote the use of sustainable transport modes 13. Conserve and enhance the historic environment, heritage assets and their setting, other local examples of cultural heritage, preserving the character and diversity of the area's historic built environment. 14. Minimise waste generation, promote recycling and avoid sterilisation of mineral resources. Remediate contaminated land and minimise the use of the best and most versatile agricultural land. 15. Maintain and enhance water quality and ensure the most efficient use of water. 							

2.8. Assessment Summary

- 2.8.1. Since this is very early work in the development of the Growth Options, high level analysis in table above, which is summarised in the paragraphs 2.8.2 and 2.8.3 below, has been done. As we move forward with Options, more detailed assessment will take place to support the Regulation 18 consultation version of the Greater Norwich Local Plan.
- 2.8.2. The above table shows in summary that Options 1, 2 and 3 may be harder to deliver. This is because they focus growth in locations that have already seen significant growth, have significant outstanding commitment and have experienced delivery issues over the JCS period. Alternatives 4 and 5 provide for a much wider dispersal of development, and in doing so increase diversity, choice and competition in the market for land, which should be beneficial for delivery. If so, then alternatives 4 and 5 would perform better than alternatives 1, 2 and 3 for delivery. Options 6 and 7 lay somewhere in between.
- 2.8.3. However, Options 1, 2 and 3 perform better than alternatives 4 and 5 in relation to objectives that seek to improve air quality, reduce the impact of traffic, address climate change issues, increase active travel and support economic development. This a result of the better geographical relationship of development under these Options to services, facilities, employment opportunities and sustainable transport options. Again, Options 6 and 7 sit somewhere in between.