

Greater Norwich Development Partnership

Date: 4 November 2020

Time: 11.30am

Venue: Virtual meeting

Board Members:

Broadland District Council:

Cllr Lana Hempsall

Cllr Sue Lawn

Cllr Shaun Vincent (Chairman)

South Norfolk Council:

Cllr Florence Ellis

Cllr John Fuller

Cllr Lisa Neal

Norwich City Council:

Cllr Kevin Maguire

Cllr Mike Stonard

Cllr Alan Waters (Vice-Chairman)

Norfolk County Council:

Cllr Stuart Clancy

Cllr Barry Stone

Cllr Martin Wilby

Broads Authority:

Cllr Melanie Vigo di Gallidoro

Officers:

Trevor Holden

Phil Courtier

Graham Nelson

Matt Tracey

Marie-Pierre Tighe

AGENDA

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1. To receive Declarations of Interest	
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4. Matters arising therefrom (if any)	
5. Questions	
<p>To consider any questions received from members of the public in accordance with the Board's Terms of Reference.</p>	
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FOR FURTHER INFORMATION PLEASE CONTACT:

Mike Burrell: Greater Norwich Planning Policy Manager

t: 01603 222761

e: mike.burrell@norfolk.gov.uk

Greater Norwich Local Plan Team, Norfolk County Council, Martineau Lane, Norwich, NR1 2DH



If you would like this agenda in large print, audio, Braille, alternative format or in a different language, please call Mike Burrell, Greater Norwich Planning Policy Manager on 01603 222761 or email mike.burrell@norfolk.gov.uk



Please call Mike Burrell, Greater Norwich Planning Policy Manager on 01603 222761 or email mike.burrell@norfolk.gov.uk in advance of the meeting if you have any queries regarding access requirements.

Greater Norwich Development Partnership Board Meeting Minutes

Date: Wednesday 30 September 2020

Time: 9.30am

Venue: Hosted by video link

Board Members:

Broadland District Council:

Cllr Lana Hempsall, Cllr Shaun Vincent (Chairman)

Norwich City Council:

Cllr Kevin Maguire, Cllr Mike Stonard, Cllr Alan Waters

South Norfolk Council:

Cllr Florence Ellis, Cllr John Fuller, Cllr Lisa Neal

Norfolk County Council:

Cllr Andrew Proctor, Cllr Barry Stone

Officers in attendance: Mike Burrell, Phil Courtier, Emily Egle, Stuart Guthrie, Trevor Holden, Helen Mellors, Graham Nelson, Marie-Pierre Tighe, Matt Tracey.

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 (GNLP). 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 District Council's Cabinet and at Council when GNLP matters were considered.

Cllr John Fuller advised the meeting that he owned some employment land in Seething.

2. APOLOGIES FOR ABSENCE

Apologies were received on behalf of Cllr Stuart Clancy, Cllr Melanie Vigo di Gallidoro and Cllr Martin Wilby.

3. MINUTES

The Minutes of the meeting held on 10 July 2020 were agreed as a correct record.

4. QUESTIONS FROM THE PUBLIC

The following questions were submitted too late to be considered at the meeting, but it was agreed that they would be included in the Minutes of the meeting, along with the officer responses.

Questions submitted by Abby Gretton of Clayland Architects -

Question 1.

Following the current Covid situation and upsurge in demand for living in towns and villages, will the GNLP now recognise that people would rather live outside of the city, and give more weight in the Plan to strategic villages and towns?

Response: The consequences of Covid on town and country planning policies are probably yet to be fully seen, with implications for all land uses like office and retail space as well as housing.

What the GNLP seeks to do is improve the sustainability of all settlements whether they be urban or rural. The draft GNLP places 31% of the housing growth currently anticipated for Greater Norwich in towns and villages, with 69% in the Norwich urban area. This is done using the standard planning approach of a settlement hierarchy. This focuses the majority of growth in and around existing built-up areas to make best use of brownfield land and accessible urban extensions. It also provides for housing growth in towns (14%), key service centres (8%) and village clusters (9%) to support our towns and to meet local needs and support local services. Based on the draft plan consultation and national planning policy, consideration is being given to the overall distribution of housing growth.

Question 2.

How tied are the Board to the original assessment of Preferred Sites, and will the GNLP make reassessments based on the new information provided?

Response: A purpose of consulting on the draft plan was to get feedback on evidence related to sites. All pre-existing and new evidence submitted through the consultation is being carefully considered in deciding on the sites to be included in the Regulation 19 version of the plan - which is the plan we will submit for examination. Where strong evidence is received to include or exclude sites in the GNLP this will be considered.

Question 3.

What weight will be given to local and parish preference for sites?

Significant weight is always given to local and parish preferences for sites, but it is not the sole consideration. Weight is also given to the evidence provided about sites. Furthermore, the local plan has to be prepared in accordance with the National Planning Policy Framework set by Government.

5. OPTIONS FOR PROGRESSING PLAN-MAKING IN GREATER NORWICH

Graham Nelson reminded Members that the timetable for the Greater Norwich Local Plan (GNLP) was agreed at the last Greater Norwich Development Partnership meeting on July 10 2020 and subsequently endorsed by the three councils.

Since then, the publication of the 'Planning for the Future' White Paper and the 'Changes to the Planning System' paper had proposed such significant changes to the standard methodology for assessing housing need in local plans that the agreed timetable for the Greater Norwich Local Plan (GNLP) needed to be reconsidered.

The White Paper was seeking to develop a simpler rules-based planning system, with local plans which were far less detailed and focused on site specifics and the allocation of sufficient land for development.

Key aspects of the proposals in the White Paper were:

Simplified local plans would be rules-based, with zoning of all land into one of the three following zones:

- Growth areas – areas for substantial development in which outline approval for development would be given automatically;
- Renewal areas – suitable for some development and densification, supported by a presumption in favour of development;
- Protected areas in which development would be restricted.

A new standard methodology for housing requirements, would be introduced.

The Community Infrastructure Levy (CIL) and Section 106 agreements were to be scrapped and replaced by a nationally set Infrastructure Levy (IL).

The White Paper made it clear that new style local plans were expected to be in place by the end of the current Parliament. This suggests that the primary and secondary legislation would be in force by the summer of 2022, approximately 30 months before the end of the current Parliament in 2024. A further year was proposed to be given to authorities that had only recently adopted local plans

under previous legislation.

The new standard methodology for housing requirements proposed in 'Changes to the Planning System' could be introduced under current regulations and could be in force by the New Year or even the end of this year.

Both documents had indicated that there would be transitional arrangements put in place to allow authorities which were close to publishing the Reg. 19 version of their plan three months from the publication of the interim standard methodology guidance to publish their Reg. 19 plan and a further six months to submit it. If this deadline could not be achieved the Plan would have to be redrafted under the new regime, which could dramatically increase the scale of housing to be provided in Greater Norwich.

The new formula, would require a 62.5% increase from just over 40,000 homes to 65,120 homes for the period from 2018 to 2038. The work carried out under the current plan-making process could not bridge this gap and there was seen to be no prospect of identifying sufficient sites for the amount of growth required being delivered by 2038.

This situation had created unpalatable choices for the way forward for plan-making for Greater Norwich, for which three possible options had been identified:

Option 1, to accelerate plan-production, making use of the transitional arrangements provided by government, based on the draft GNLP already consulted on;

Option 2, to extend the existing timetable, planning for the higher housing numbers proposed by Government. This option was not considered tenable;

Option 3, to cease production of the GNLP and to work on emerging issues flagged up by Government in the White Paper, including improving our digital plan-making capacity, new settlements and focusing on the design codes needed to provide locally distinctive, high quality development.

Officers considered that option 1 represented the best chance of getting the current plan adopted. This would make best use of the considerable amount of work carried out to date and would provide certainty to the development industry, whilst allowing the Planning Authorities to retain control of development. This would involve certain risks, but the officer view was that there would be ways to mitigate against these risks.

It was also suggested that alongside Option 1 the following elements of Option 3 be taken forward:

- Examining best practice and building design skills in order to prepare for public sector-led master planning and design codes that were very likely to be required for growth areas.
- Work could be done on the possible location for one or more new settlement(s), including understanding associated infrastructure

requirements and delivery challenges;

- Preparation for the '*radical, digital-first approach*' to plan-making that was proposed in the White Paper.

This would have resource implications, but much of this would be mitigated by the probable abolition of CIL, which would make a CIL Review unnecessary and free up officer resources.

The proposed recommendation in the report was, therefore, for a hybrid of Option 1, with preparatory work for a further Local Plan after the transitory arrangements ended.

The Chairman suggested that it would be premature to consider ceasing work on the GNLP and restarting when the new regime was implemented, as there was not enough detail available about the content in the final legislation.

He also expressed concern about the five-year land supply, if the existing Plan was not brought forward to the Reg.19 stage.

A Member noted that delayed delivery, rather than plan making had been the main issue being faced in Greater Norwich. He noted that the new system of plan making and Infrastructure Levy would be a radical departure, but it would not be a waste of effort to continue with the existing Plan, with the hybrid option proposed, whilst keeping the position under close review. He confirmed that the County Council, therefore, supported the recommendations, as set out in the report.

Another Member agreed that the proposed recommendations were the best way forward and noted that this would be consistent with the position expected by Government that local planning authorities should continue with the production of local plans, rather than stopping and switching to the new system. He also suggested that if the transition system was used it would be a service to democracy as the public had had an input into the existing local plan and by not going with the proposal it might leave the planning authorities open to speculative planning applications.

However, another Member suggested going forward with the Reg.19 should not be an end in itself: the important thing was that it should be found to be sound.

He voiced concern about the number of dwellings that would be put forward for the Reg.19 and questioned if it would be the number in the existing Plan or whether there would be a safety margin included and, if so, what that figure would be.

In response, the Chairman confirmed that the intention was to proceed with the existing numbers set out in the Plan and he noted that this had not included windfall sites, so there would be additional capacity for more housing to be included in this number.

It was emphasised that the paper before Members concerned the timetable of the Plan preparation, rather than the content of it, which would be the subject of

further discussion once the timetable was agreed.

Members were also asked to note that one mitigation of risk might be to increase the housing numbers in the Plan, but an informed assessment would only be possible once the analysis of the Reg.18 consultation had taken place and the responses assessed and the sites proposed were considered. These issues would be the subject for Members to debate going forward.

A Member suggested that it should be made clear that the housing numbers in the Plan could increase significantly and there were a number of risks that were material to the decisions that the Board would be making, which could lead to the Plan being found unsound at the Reg.19 stage. He went on to say that the Reg.18 had not been sufficiently assessed and there were a whole range of studies that had not been carried out to allow the Plan to progress to the Reg.19 stage; these included work on the Western Link. He questioned whether all of these could be accomplished in eight weeks and he suggested that the mitigation of these risks should be addressed as a matter of urgency. He added that the increase in housing numbers proposed would be so significant that it could only be accommodated by a new settlement and that this would need to be given thorough consideration, which could not be done within this timescale.

In response, the Chairman advised the meeting that the Board had received a high-level summary of the Reg.18 consultation at its meeting in July and officers had been working on this since then. Conflicting legal advice had been received regarding the inclusion or not of the Western Link in the Plan. He emphasised that the Board's role was not to look at the fine detail of the consultation, but to steer it at a strategic level.

A Member suggested that the best way forward would be to agree to the proposals in the report and noted that the Government would not want the work that had already been undertaken on the Plan to be wasted and that it was likely that some compromise would be reached on the numbers as the Plan progressed. She emphasised the importance of maintaining dialogue with the Government and keeping the housing numbers under review.

In response to a query regarding the transition period the Board was advised that there was considerable uncertainty over the triggering of the three month period from the publication of the standard methodology guidance, as it was only a consultation proposal. However officers remained optimistic that if the Reg.19 could be completed by 30 November the transitional arrangements could be utilised.

The Board was also advised that officers were confident that they could gather the evidence to bring forward the Plan by this date, but would only put it forward to Members for approval if they were certain that it would meet the test of soundness. The key benefit of this would be maintaining development control over Greater Norwich for the next four to five years.

It was noted that a number of informal meetings would be required before 30 November 2020 to monitor the management of the risks and the content of the Reg.19 Plan and that a formal meeting of the Board would also be arranged for

late October.

RESOLVED

to

- Agree the revised timetable for plan preparation set out in paragraph 48 of this paper and recommends member councils to update the LDSs to reflect this;
- Instruct officers to prepare a Regulation 19 pre-submission version of the Plan for consideration by the GNDP Board in December 2020 and arrange an additional meeting of the Board in late October 2020;
- Agree the budget position summarised in paragraphs 49 to 51;
- Cease all work on the previously agreed CIL review;
- Keep the position under close review. Further information is likely to be available in the New Year on the level of housing need resulting from the standard methodology, the timing of the introduction of the new legislation and the detail of the transitional arrangements.

The meeting closed at 10.32am

Greater Norwich Development Partnership (GNDP)	
Report title	Progress on the Greater Norwich Local Plan
Date	4th November 2020
<u>Recommendation</u>	
<p>That the Board:</p> <ul style="list-style-type: none"> • Notes progress on producing the Regulation 19 version of the Greater Norwich Local Plan; • Notes the recent clear government advice that local planning authorities should take local plans they are currently working on through to adoption; • Continues to keep the position under close review, deciding on the timing of the Regulation 19 publication in the new year depending on the publication and detail of the transitional arrangements for plan-making. 	

Introduction

1. The last GNDP meeting on 30th September 2020 recommended that officers should prepare a Regulation 19 publication version of the Greater Norwich Local Plan (GNLP) with a view to making use of the Government’s proposed transitional arrangements for plan-making, depending on their further clarification.
2. As agreed by the last GNDP, the decision on whether to publish the Regulation 19 pre-submission draft plan in February/March 2021 will need to be made at cabinet meetings in early January.
3. This acceleration of the plan timetable reflects the fact that the white paper “Planning for the Future” and the associated consultation on a new method for assessing housing need have wholly changed the context for the timetable for the GNLP. This has left us with some very difficult choices which will all involve less optimal solutions compared to those envisaged in the timetable agreed in June 2020.
4. This paper aims to provide as clear a picture as possible in the currently fluid situation in which the outcome of the national consultations on the white paper and standard methodology, and thus the detail of any transitional arrangements, are not yet known.

5. To do this, the paper focusses on progress on producing the Regulation 19 plan ahead of its currently planned consideration by the GNDP at their December 2020 meeting and subsequent consideration by cabinets in January 2021.
6. It is intended to assist members in understanding the likely implications of using the transitional arrangements. This is done by setting out the key issues that led to changes to the timetable in July 2020 and how work is progressing on these to enable us to achieve the extremely tight deadlines that could result from the government's transitional arrangements.
7. As reported to the last GNDP, transitional arrangements allow authorities that are close to publication of their plans to proceed with the preparation of the current plan. The transitional arrangements Government has consulted on propose that authorities which are close to publishing the Regulation 19 version of their plan should be given three months from the publication of the interim standard methodology guidance to publish their Regulation 19 plan and a further 6 months to submit it.
8. However, a key issue we face at present is that we do not know when that interim standard methodology will be published. While this creates great uncertainty, many of the benefits of using the transitional arrangements have become clearer since the GNDP meeting in September.
9. As a reminder, the main changes to the timetable agreed in July 2020 are that we will not be able to undertake additional Regulation 18D consultation as previously envisaged. We will therefore need to take a different approach on some issues as set out in the table below. The table identifies both the progress that has been made and future actions that will be undertaken to allow us to progress under the transitional arrangements as consulted on by Government.
10. The accelerated timetable means that updates to some of our evidence work will not be completed in time for the December 2020 GNDP meeting, so will need to be reported to cabinets in January if we are to publish the Regulation 19 version for comment in February/March 2021.
11. Other evidence work, chiefly related to the economy, will be augmented to be available for submission in July 2021, so it can be considered by the Inspector at the examination. This will allow a longer-term view to be taken to reflect the current economic uncertainty largely resulting from Covid-19 and Brexit. The table below also sets out where this is the case.

Progress on using the transitional arrangements

12. The key issues as set out in the July 10th GNDP report that prompted a need for a revised timetable at that point, along with progress and future actions on them, are:

Issue	Progress and future actions
Local Plan coverage	
Incorporating consultation feedback into the plan	<p>The July GNDP report highlighted the need to comprehensively incorporate consultation feedback in the re-draft of the plan. Work on this task has been prioritised and has progressed well. Staff are doing re-drafts of policies based on consultation comments and new and emerging government policy to inform the content of the draft plan for consideration at the GNDP in December. However, topic papers providing justification for the policy approach will not be as complete as we had intended at this stage to assist members in decision making. They will though be complete to support the Reg. 19 submission (see further below).</p> <p>Current thinking on the proposed changes to the plan will be the subject of a workshop with GNDP Members.</p>
Incorporating new and emerging national policy into the plan	<p>This task has been prioritised and staff are re-drafting policies to reflect the new and emerging government policy. In the case of both energy policy and accessible homes, the government has signalled its intention to require more demanding national standards than those proposed in the draft GNLP. Depending on the timing and content of national implementation of these standards, it may no longer be necessary to set policies on these issues through the GNLP.</p> <p>The re-drafts to the plan also include language used in the white paper to show we are moving towards the emerging system e.g. by referring to areas of growth, renewal and protection and by referring to the GNLP continuing and developing the JCS strategy and setting the foundations for our strategy under the new planning system.</p>
Not allocating land for the Norwich Western Link	<p>The previous intention had been to consult on whether land should be allocated for the Norwich Western Link (NWL). Consideration of this will no longer be possible as the accelerated timetable means that this issue cannot be consulted on. However, it is common practice for local plans not to make a specific allocation for transport infrastructure. It is worth noting that the scheme is progressing well on its path to a planning application. As in the draft Regulation 18 version of the GNLP, the NWL will continue to be supported through policy 4 on infrastructure, to be progressed as one of the proposals of the Transport for Norwich Strategy.</p>
Gypsy and Travellers Site/s	<p>Since no sites have been submitted for consideration, we do not currently have Gypsy and Traveller sites to meet needs other than in the first 5 years of the plan period. While we have a positive criteria-based policy to allow sites to come forward, we had intended to once again request that sites should be submitted through the Regulation 18D consultation to allow site allocation in the Regulation 19 version of the plan. Further evidence work is being produced on Gypsy and Traveller policy by RRR consultants, engaging directly with the Gypsy and Traveller and the Travelling Show People communities. If this confirms the need to provide an additional site or sites, we will investigate how this can be done through a planning application.</p>
Settlement boundaries	<p>We have not consulted on settlement boundary changes to accommodate suitable small site proposals of less than 0.5 hectares. Since this is a strategic plan, it is not considered necessary to make these changes in this plan.</p>

Housing numbers	We have been considering evidence on housing provision in the plan. This will be the subject of a workshop with GNDP Members.
Updating the SA/SEA	Work is ongoing to ensure that this will be available to accompany the Regulation 19 plan. Processes have been put in place to ensure that appropriate explanations etc. are included.
The Evidence Base	
Economy, Retail and Town Centres	<p>The July 2020 GNDP report pointed to the advantages of delay to enable a comprehensive analysis of economic issues to take place once the economic situation becomes clearer.</p> <p>Avison Young, who have recently taken over GVA, are producing an addendum to the Employment, Retail and Town Centre Study produced in 2017 which informed the draft plan's approach on these key issues.</p> <p>The updates to the evidence base will include an initial assessment of the potential impacts of Covid-19 and Brexit to inform policy making. At this stage, the addendum will not cover the issues in as much detail as we had previously intended, though they will nevertheless provide policy advice for the Regulation 19 plan. The consultants will feed back findings to officers on an ongoing basis to assist in making policy updates for the GNDP in early December.</p> <p>Scheduled completion of the addendum in late November is likely to require further updates to the policy to be made under delegated authority ahead of district councils' cabinet meetings to sign off the Regulation 19 plan in mid-January 2021.</p> <p>We could consider whether a further update would be appropriate to accompany the submission to ensure the most up-to-date evidence is available at the examination.</p>
Other studies (Water Cycle, HRA, Green infrastructure, Level 2 Flood Risk)	A number of evidence studies are ongoing. These studies should be available to accompany the Regulation 19 publication version of the plan. However, due to the accelerated timetable, some evidence studies may not be available for the GNDP Board in December. The evidence studies should be available for cabinets to sign off of the Regulation 19 document in January 2021.
Viability	Revised typologies are being produced within the tight timescales to inform the Regulation 19 plan. There is the additional possibility of undertaking further work on the potential for brownfield and strategic sites to meet plan requirements for issues such as affordable housing. This would be submitted with the plan and would assist the Inspector in recommending any modifications which might be required to the plan.
Housing Needs Study (SHMA)	Existing SHMA evidence will be submitted with the plan. Any further updates to assist the Inspector will be commissioned, most likely on a Greater Norwich only basis, to provide additional evidence which could be used if the Inspector is so minded. This would allow the Inspector to propose any modifications required to the submitted plan.

Topic Papers	There will no longer be time to produce detailed topic papers to support GNDP member decision making on the Reg. 19 version of the plan in December. However, the reasoning for the changes to the Regulation 19 GNLP will be included in the reports to the GNDP and cabinets. To assist this, officers are keeping a record of the reasoning behind proposed changes as work progresses. The topic papers will be available for the Inspector at submission of the plan in July 2021. Whilst production of topic papers is good practice, there is no regulatory requirement for them.
Infrastructure Funding	
CIL Review	“Planning for the Future” proposes the replacement of Section 106 payments and CIL by a nationally set Infrastructure Levy based on development profit, to be collected and spent locally. Assuming this is implemented, this means that a review of CIL is no longer required.

The Hybrid approach for the GNLP

13. The GNDP agreed in September that a hybrid approach should be taken to plan-making in relation to the options it considered then, concluding that option 1 (to use the transitional arrangements) should be combined with elements of option 3.
14. As agreed in September, work on elements of option 3 could start from spring 2021, allowing us to prepare for elements of the new planning system to be implemented as a result of the “Planning for the Future” white paper. This work would cover digital plan-making capacity and new settlements. Consideration could also be given to progressing work on design codes, depending on the production of government guidance.
15. The remainder of this paper provides more detail on the benefits of taking this approach to the GNLP, highlighting actions that will be taken to support this.
16. Further to the above, Government has recently made it clear that it expects local planning authorities to continue to produce existing plans ahead of the implementation of the new system over the coming years. Recent examples of clear statements on this issue include firstly Robert Jenrick, the Secretary of State for Housing, Communities and Local Government, stating *“It’s important everyone keeps going under the current system in the interim, and that local authorities don’t pause their plan-making processes”*. Secondly, Joanna Averly, the recently appointed Chief Planner, has strongly encouraged councils not to slow down local plan work in response to white paper changes in the MHCLG [Planning Newsletter](#) of October 1st.
17. This clear advice is backed up by a threat of sanction for not having an up to date NPPF compliant local plan in place by December 2023 as currently required by government. The nature of the sanction has not been defined but could include some form of intervention.
18. The clear government statements have emphasised that the best way forward is to progress under transitional arrangements. The GNLP will provide the link to the new

planning system and the certainty needed to meet housing needs and sustainably grow the economy in the short-term using an up to date plan.

19. “Planning for the Future” has set out at a high level how the planning system is likely to change over the next few years, including making local plans shorter and focussed on strategy and the sites to implement that strategy. Since the GNLP is drafted to perform those functions, with very little repetition of nationally established development management policies, it is well placed to provide continuity to the new system.
20. Informal feedback on the recent GNLP meeting suggests strong local developer support for using the transitional arrangements to get a plan in place as soon as possible i.e. in 2 years. There appears to be little support for waiting at least 4 years for a new style plan to be in place.
21. A further benefit of progressing under the transitional arrangements is that it will allow other plans which are dependent on the GNLP to continue to be produced.
22. This includes the South Norfolk Villages Site Allocations Plan and the East Norwich Masterplan SPD. Without the GNLP, it is difficult to see how there can be any justification for the production of these plans. The current adopted plan, the JCS, does not provide sufficient context to allow more sites to be allocated or for supplementary guidance to be provided. Therefore, without the GNLP, there is a real risk that these positive plans could not be progressed.
23. Making it clear that the GNLP provides the strategy which the plan allocating sites in South Norfolk villages follow should assist in allowing these plans to be produced slightly after the GNLP to timetables which do not have to comply with transitional arrangements. This is because the plan’s role will be to implement the GNLP strategy rather than providing strategic policies.
24. Finally, although are are very much in the hands of the government on whether there will be changes to how the way 5-year land supply is calculated is changed, progressing the GNLP under transitional arrangements is likely to be beneficial in relation to this issue.

Conclusions

25. We have already consulted on a strong draft plan and are close to completing our analysis of that consultation. We also have a broad evidence base which can be supplemented. This means that, with the progress recently made and the future actions set out in this report, a local plan which has good prospects of being found sound can be ready to be published for Regulation 19 comment in February 2021.

26. The government has been absolutely clear that we should continue with plan-making. Officers are progressing work as fast as possible given the difficult situation the planning reforms and wider work and economic uncertainties have created.
27. Depending on the government's production of updated plan-making requirements, a review of the situation in January could enable us to take account of any changes to the transitional arrangements that may be made, potentially providing us with additional flexibility.

Greater Norwich Development Partnership (GNDP)	
Report title	Regulation 18C consultation feedback summaries
Date	4th November 2020
<u>Recommendation</u>	
<p>That the Board notes:</p> <ul style="list-style-type: none"> • the summaries of the Regulation 18C consultation feedback in the appendices to this report; • that the consultation feedback in the appendices is being used, along with the evidence base and taking account of the National Planning Policy Framework, to update the Greater Norwich Local Plan for its Regulation 19 publication intended to be scheduled for consideration by the GNDP in early December; • responses to consultation comments setting out plan changes will be available to support submission. 	

1. The GNDP meeting on 10th July 2020 considered a high-level summary of representations received through the Regulation 18C consultation on the draft Greater Norwich Local Plan (GNLP) held in early 2020. This included information on the number of representations received and feedback from the consultation events. It also covered the main issues raised on the strategy, together with an initial view on the main actions in addressing these.
2. This report contains the longer summaries of the consultation comments in a number of appendices, including comments on both the GNLP Strategy and Sites Plans.
3. The tables in the appendices are divided up by questions responded to, with information on the number of responses received. They include:
 - the respondent (naming organisations, with comments from members of the public identified by reference number);
 - whether they support, object to or are commenting on the plan;
 - a summary of the comments;
 - the main issues requiring investigating.
4. The appendices are available as separate documents from [this page](#) on the GNDP web site. They are organised by the structure of the Regulation 18C draft plan covering:

The Strategy		Page in appendix	
Appendix 1	Introduction (questions 1 and 2)	2	
	Spatial Profile (questions 3 to 5)	23	
	Vision and Objectives (questions 6 to 8)	45	
	Statements on growth delivery and climate change (questions 9 to 12)	70	
	Policy 1 – The Sustainable Growth Strategy (questions 13 to 17)	110	
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	Policy 5 - Homes (questions 27 to 33)	390	
	Policy 6 - The Economy (questions 34 to 37)	428	
	Policy 7 – Strategy for the Areas of Growth		
	7.1 The Norwich urban area including the fringe parishes (questions 38 to 40)	444	
	7.2 The main towns (questions 41 and 42)	461	
	7.3 The key service centres (questions 43 and 44)	485	
	7.4 The village clusters (questions 45 and 46)	485	
7.5 Small scale windfall housing development (question 47)	513		
Overarching consultation question (48)	523		
The Sites Plan			
Appendix 2	Sites Introduction – general comments	Please search the appendix by settlement/parish/site name or reference number using the CTRL F facility on your computer.	
Appendix 3	The Norwich urban area including the fringe parishes		
Appendix 4	The main towns		
Appendix 5	The key service centres		
Appendix 6	The Broadland village clusters		
Appendix 7	South Norfolk villages non-residential		
Evidence			
Appendix 8	The evidence base	Please search for specific studies as above	

5. The consultation feedback in the appendices is being used, along with the evidence base and taking account of the National Planning Policy Framework, to update the Greater Norwich Local Plan for its Regulation 19 publication intended to be scheduled for consideration by the GNDP in early December 2020.
6. Responses to consultation comments setting out plan changes will be available to support submission.
7. The accompanying report on this agenda identifies progress made in producing the Regulation 19 pre-submission draft plan. This progress reflects the main actions identified in the July 10th report referred to above.