

## **ADOPTION OF THE GREATER NORWICH LOCAL PLAN**

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**Portfolio:** Policy; and Planning

**Wards Affected:** All

### **Purpose of the Report:**

To consider the outcome of the examination into the Greater Norwich Local Plan (GNLP) and to recommend adoption of the plan.

### **Recommendations:**

It is recommended to Cabinet that Council:

1. notes the inspectors' report (at Appendix A) and the required main modifications in appendices 1 to 5 (available from [this link](#));
2. adopts the modified GNLP (documents J2.1 to J2.11 inclusive available from [this link](#)); and
3. delegates authority to the Assistant Director for Planning to publish the Adoption Statement and accompanying documents, making the GNLP part of the Adopted Local Plan for Broadland.

## 1. Summary

- 1.1 The report by independent Inspectors Mike Worden BA (Hons) Dip TP MRTPI and Thomas Hatfield BA (Hons) MA MRTPI into the soundness and legal compliance of the Greater Norwich Local Plan (GNLP) has been received. In line with the requirements of the Regulation 25 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), a publication notice and the inspectors' report were published on the GNLP and the partners' websites on February 20th. Interested parties were also notified of the publication of the report.
- 1.2 The inspectors conclude that, subject to the inclusion of the main modifications they recommend being incorporated into the plan, the GNLP is sound and can be adopted as part of the local plans for Broadland, Norwich and South Norfolk.
- 1.3 This report provides a summary of the development and content of the GNLP and of the inspectors' examination conclusions. It proposes that Council adopts the modified GNLP.
- 1.4 Appendix A contains the inspectors' report which summarises the main modifications required to make the plan sound. These changes are detailed in appendices 1 to 5 (documents J1.2 to J1.6 inclusive available from [this link](#)).
- 1.5 The GNLP, including the main and additional (minor) modifications, is in documents J2.1 to J2.11 inclusive available from [this link](#).
- 1.6 If the councils resolve to adopt the GNLP, Adoption Statements will be placed on each of the three councils' websites in line with Regulations 17 and 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 1.7 The Sustainability Appraisal of the plan consists of a number of documents. It is available from section J4.2 [here](#). To meet the requirements of Regulation 16 of the SEA Regulations, an Environmental Adoption Statement will be published with the GNLP's Adoption Statements. It is available in section [J4.1](#) here.

## 2. Background

- 2.1 Greater Norwich has an excellent record of partnership working. We were one of the first partnerships nationally to adopt a joint local plan, the Joint Core Strategy, in 2011 (only 16 areas have adopted joint plans in England).
- 2.2 Since 2013, we have taken a successful and unique approach by pooling Community Infrastructure Levy (CIL) income from developers to help to pay for the infrastructure improvements we need. We have also worked with all the Norfolk planning authorities and with infrastructure providers and environmental bodies to plan together for our strategic needs across the county and with Suffolk. As a result, growth has been well-planned, with new infrastructure delivered to support it, whilst at the same time protecting and enhancing our special environment.

- 2.3 Local plans set the development framework for an area, usually for the next 15 years. To do this, they:
- Contain planning policies which are the basis for deciding whether to approve planning applications.
  - Allocate sites for development, including homes and employment sites, which respond to evidenced local needs and opportunities.
  - Ensure that buildings and places are sustainable, beautiful and of a high quality.
  - Facilitate the delivery of local infrastructure, such as new schools, health and community facilities, transport, and green infrastructure such as parks, street trees, local wildlife areas and woodlands.
  - Protect and enhance the natural, built and historic environment.
  - Respond to climate change and support nature recovery.
- 2.4 National policy requires local planning authorities (LPAs) to have local plans which reflect recent changes to the National Planning Policy Framework (NPPF) submitted by the end of June 2025 and adopted by December 2026. Government evidence on local plan progress shows that it takes 7 years, on average, to produce a local plan and that approximately 35% of LPAs have adopted a local plan in the last 5 years.

### **3. Current positions/findings**

#### The GNLP and other local plan documents

- 3.1 On adoption, the GNLP will supersede the current JCS and the Norwich and Broadland site allocations plans, along with the majority of South Norfolk's site allocations plan. It consists of the strategy for growth, the site allocations to implement that strategy and a monitoring framework. Resulting changes to the adopted Policies Map are available in section J3 [here](#).
- 3.2 Allocations will be made in a separate plan in the smaller villages in South Norfolk through the South Norfolk Village Clusters Housing Allocations Local Plan. The Diss, Scole and Burston area allocates sites through their Neighbourhood Plan.
- 3.3 As well as making new site allocations, the great majority of the undeveloped sites in the site allocation plans adopted around a decade ago are re-allocated through the GNLP.
- 3.4 The GNLP will not replace existing adopted Area Action Plans (AAPs) for Long Stratton, Wymondham and the Growth Triangle (NEGT), though in some cases additional allocations are made through the GNLP in these areas. The GNLP will be used in conjunction with the adopted AAPs, development management (DM) plans for the three districts and Neighbourhood Plans.

#### The GNLP Strategy

- 3.5 The growth strategy in the GNLP builds on and further develops the strategic approach taken in Greater Norwich in recent years and has been developed

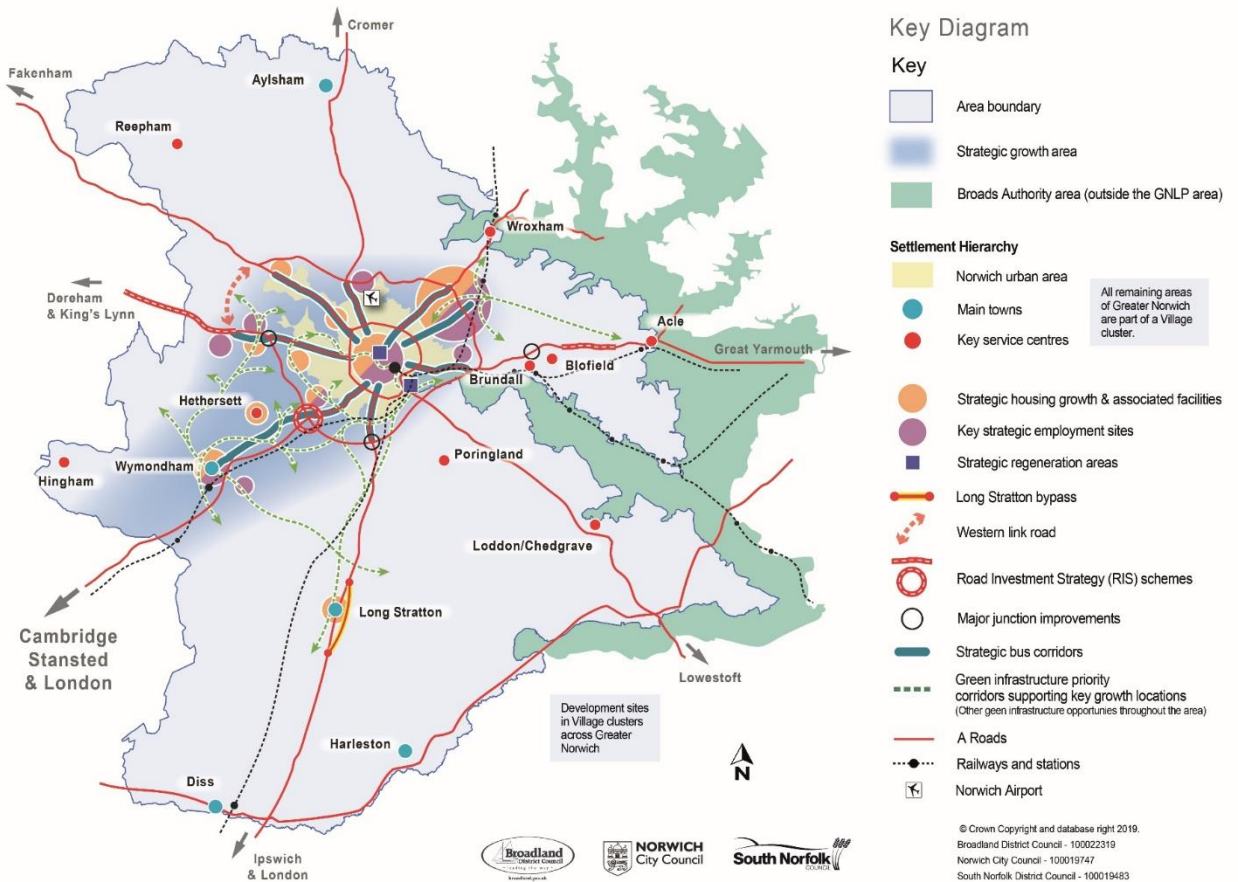
through detailed community and stakeholder consultation. Its development has taken account of a broad range of issues and views. It is well-evidenced, meets the plan's objectives and has now been endorsed by the government appointed inspectors through its examination.

- 3.6 The GNLP provides for up to 45,050 new homes, a jobs target of 33,000 jobs and 360 hectares of employment land from 2018 to 2038. It will ensure that Greater Norwich's housing and jobs needs will be fully met in a sustainable manner, supporting the growth of the post carbon economy, assisting in tackling climate change and protecting and enhancing the many environmental assets of the area.
- 3.7 This will be achieved through the strategy focussing the great majority of growth in and around the Norwich urban area and the fringe parishes, the towns and the larger villages, together with some growth in smaller villages to support local services as follows:
- 62% of the new homes will be in the Norwich urban area and the fringe parishes. These homes will be provided firstly through infill and regeneration sites (including East Norwich) to maximise brownfield capacity and secondly on urban extensions. The largest urban extension is the Growth Triangle to the north-east of the city in Broadland, providing just over 10,000 homes to 2038, as well as jobs and infrastructure (including a secondary school). This now includes a new strategic allocation at White House Farm, Sprowston. Extensions to the north-west of the city at Taverham (a new strategic allocation), to its west at Easton, Costessey and Three Score and south-west at Cringleford provide other strategic housing growth locations.
  - 15% of the new homes will be in the main towns. There are new sites in Aylsham, Diss (partly through its Neighbourhood Plan), Harleston and Wymondham, with no additional sites in Long Stratton.
  - 8% of the homes will be in the key service centres (new sites are allocated in Acle, Blofield, Hingham and Loddon).
  - 9% of the homes will be in the village clusters covering the remaining rural areas of Broadland and South Norfolk. These sites will provide growth to meet local needs and support local services.
  - 6% of the homes will be provided by windfall development.
- 3.8 The strategy provides the great majority of employment land at strategic sites (at Norwich City Centre, the Norwich Airport area, Browick Interchange Wymondham, Longwater, Rackheath, Broadland Business Park, Broadland Gate, Norwich Research Park, Hethel and the Food Enterprise Park at Easton/Honingham). Allocations also provide smaller sites with local job opportunities.
- 3.9 The strategy includes a strategic growth area promoting Greater Norwich's economic strengths and sectors and linking via the Cambridge Norwich Tech Corridor to other regional and national growth corridors centred on Cambridge. The increased focus on the strategic growth area defined in the GNLP assists consideration of future strategic approaches, potentially including a new settlement or settlements.
- 3.10 This approach will both assist the ability to access external funding and emphasise the role that Norwich, in particular the city centre as a regional centre

for jobs, retailing, leisure, entertainment and cultural activities, and the Norwich Research Park (NRP) for employment, play as a driver of the regional economy, generating travel and contributing to the economy. This strong focus on the strategic growth area will assist strong economic growth in the area. It will also provide for the co-location of jobs and homes, providing strong links to services, education opportunities and other facilities, at the same time promoting active and sustainable travel.

- 3.11 The strategy also promotes the protection and enhancement of the built and natural environment and local landscapes. This is done through the further development of the green infrastructure network and the retained strategic focus on continued protection of river valleys and strategic gaps.
- 3.12 The GNLP promotes a pro-active approach to housing delivery through only allocating housing sites where a reasonable prospect of delivery has been evidenced. The plan also provides choice and flexibility by ensuring there are enough committed sites to accommodate 11% more homes than “need”, should they be required to offset any non-delivery. Additional opportunities will be provided through windfall development.
- 3.13 As such, the proposed strategy offers the opportunity to strengthen Greater Norwich’s role as a key part of the national economy. Economic growth in Greater Norwich is set to be in key sectors that will assist in the national and international adaptation to a post carbon economy, including in plant sciences and high value engineering.
- 3.14 Taken together, these measures will ensure that housing needs to 2038 will be fully met in sustainable manner, supporting the growth of the post carbon economy in Greater Norwich and more widely, assisting in tackling climate change and protecting and enhancing the many environmental assets of the area.
- 3.15 The GNLP Strategy is summarised in the plan’s Key Diagram below.

## Greater Norwich Local Plan (GNLP) Key Diagram



### GNLP Plan-making Stages

- 3.16 The publication of the inspectors' report is the end of the GNLP's examination. The independent planning inspectors, who are appointed by the Planning Inspectorate on behalf of the Secretary of State, have assessed the soundness of the submitted plan through its examination.
- 3.17 Plans are 'sound' if they are:
- Positively prepared – i.e. it provides a strategy which, as a minimum, meets the area's objectively assessed needs and is informed by agreements with other authorities;
  - Justified – it is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - Effective – it is deliverable over the plan period, and is based on effective joint working on cross-boundary strategic matters as evidenced by a statement of common ground;
  - Consistent with national policy – it enables the delivery of sustainable development in accordance with national policies.
- 3.18 In line with regulatory requirements, the following stages have been undertaken in producing the GNLP:

<b>Stage</b>		<b>Dates</b>
Call for Sites		May to July 2016
<b>Regulation 18 Preparation Stage</b>		
Stage A	Growth Options and Site Proposals consultation	January to March 2018
Stage B	New, Revised and Small Sites consultation	October to December 2018
Stage C	Draft Plan Consultation	January – March 2020
<b>Regulation 19 Publication Stage</b>		
Pre-submission Draft Plan for representations on soundness and legal compliance		February – March 2021
<b>Submission and Examination Hearings</b>		
Submission to the Secretary of State		July 2021
Public Examination Hearings		February 2022 – July 2023

### Examination Hearings

- 3.19 The hearings were divided into 5 sections:
- Parts 1 and 2 in February and March 2022 covered the strategy and site allocations.
  - Part 3 in July 2022 was on the East Norwich Strategic Regeneration Area.
  - Part 4 in March 2023 was on Nutrient Neutrality and Housing (specifically the trajectory for the delivery of homes).
  - Part 5 in July 2023 was on Gypsy and Traveller needs and site allocations.

### Inspectors' Letter

- 3.20 A letter from the inspectors was received on August 9<sup>th</sup> 2023. It is available on the [GNLP website](#). It showed that the inspectors were generally content with the plan, but that a number of policies, largely relating to site allocations and housing delivery, would require main modifications to the 2021 submitted version of the plan which was the subject of the examination.

### Main and Additional Modifications

- 3.21 Almost all local plans require main modifications to be made to them.
- 3.22 The main modifications were subject to consultation between October 25<sup>th</sup> and December 6<sup>th</sup> 2023. Consultation feedback was received from 67 respondents who made 257 individual representations. Many of the responses did not raise soundness issues and some comments only focussed to a limited extent on the main modifications, instead returning to issues already addressed through the examination, such as objecting to specific site allocations or requesting the inclusion of sites not allocated in the plan.
- 3.23 The Inspectors took note of the partnership's view on the consultation comments, along with the other comments made, in concluding on the modifications that are needed to make the plan sound. In this light, the Inspectors have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity.

Where the Inspectors' feel it is appropriate, their report references their response to specific soundness issues raised.

- 3.24 Additional modifications, mainly to supporting text rather than policies, have also been made. These are largely updates and clarifications which do not relate to the soundness of the plan. They do not form part of the inspectors' examination of the plan and were available for reference rather than being part of the main modifications consultation. They include:
- Factual updates to supporting text, especially in the spatial profile e.g. new census data.
  - References to changes in national policy e.g. the Levelling Up and Regeneration Act (LURA) and nutrient neutrality requirements.
  - Progress on infrastructure schemes.
  - National targets for reduction in greenhouse gas emissions.
  - Removal of footnotes and replacement with references in text where required.
- 3.25 Further factual updates have been made to the additional modifications to reflect the final outcome of the plan's examination and the passage of time.
- 3.26 Taking account of the examination hearings and the consultation feedback, the modifications to the plan which they have concluded are necessary to make the GNLP sound have been included in the Inspectors' Report.

### The Inspector's Report

- 3.27 The inspectors' report concludes that with the specific main modifications, the plan satisfies legal requirements and meets the criteria for soundness in the NPPF. However, the councils can only adopt the plan if they incorporate the modifications that the inspectors view as necessary to make the plan sound. Consequently, the councils must now consider whether or not to adopt the plan in the light of the inspectors' report and recommendations.
- 3.28 The inspectors' report in Appendix A begins with a Non-Technical Summary, an Introduction and a section providing the context for the plan. The Non-Technical summary of the main modifications requires:
- Amending Policies 2 and 3 for clarity, consistency with national planning policy, to reflect updated evidence, and in light of Natural England advice on nutrient neutrality mitigation;
  - Amending Policy 7.5 so that it relates solely to self/custom build housing;
  - Deleting Policy 7.6 for new settlements;
  - Deleting the Costessey Contingency Site Allocation;
  - Deleting those site allocations which are not justified;
  - Amending site allocation policies to remove ambiguity and clarify development requirements;
  - Allocating sites for Gypsy and Traveller needs;
  - Updating the housing supply figures and housing trajectory to reflect the evidence;
  - Replacing the monitoring framework;



- A number of other modifications to ensure that the Plan is positively prepared, justified, effective and consistent with national policy.
- 3.29 The report then addresses legal compliance concluding that the plan meets all legal requirements. Specifically, the report states that:
- The Inspectors have had due regard to the Equalities Act through the examination, including their consideration of the allocation of Gypsy and Traveller sites to meet identified need, and policies relating to accessible and adaptable housing.
  - The Partnership has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.
  - The Sustainability Appraisal has adequately considered reasonable alternatives and is suitably comprehensive and legally compliant.
  - The legal requirement to undertake an appropriate assessment in accordance with the Habitats Regulations has been met. This work focuses on the impacts of the plan on internationally protected habitats. Policy requirements to protect those habitats in relation to visitor pressure and nutrient neutrality are included in policy 3 of the plan.
  - Public consultation requirements for the plan were addressed in line with our Statements of Community Involvement and Local Development Schemes and meet the requirements of the national Regulations.
  - The plan meets legal requirements in respect of preparing policies to address climate change.

### Soundness

- 3.30 The Inspectors identified nine main “soundness” issues which were investigated through the examination and conclude that if the modifications they recommend are made:
- The Plan’s overall spatial strategy is based on robust evidence and is justified and effective. They consider that the spatial distribution across the Plan area is logical, it has been selected following consideration of reasonable alternatives and is an appropriate strategy as required by the NPPF.
  - The housing requirement of 40,541 homes for the Plan period, based on the standard methodology using 2014 based projections, is justified and consistent with national policy. Also, the Plan’s jobs target of 33,000 jobs, and the allocation of around 360 hectares of employment land, are sound.
  - The strategy for the economy and areas of growth is justified, effective and consistent with the evidence. This includes the approach taken on village clusters and a modified approach to small-scale windfall housing in policy 7.5 to place its focus on self and custom build housing. The Inspectors also conclude that a review of the Local Plan will need to assess options for longer term growth which may include the potential for a sustainable new settlement or settlements.
  - The Plan policies relating to Sustainable Communities (policy 2 covering various aspects of design, including accessibility, density, designing out crime, water efficiency, and energy consumption) and Environment Protection and Enhancement (policy 3 covering the built, historic and natural environment, and

modified to cover nutrient neutrality) are justified, effective and consistent with national policy.

- With a modification to clarify that strategic infrastructure schemes in policy 4 being progressed by other bodies including Norfolk County Council and National Highways, such as the Norwich Western Link, are not required to deliver any allocation, the Plan accords with the evidence and is justified and effective.
- The Plan's approach to the provision of affordable housing, Gypsy, Traveller and Travelling Showpeople accommodation, self and custom build housing, and the housing needs of other groups, is justified, effective and consistent with national policy.
- The Partnership's approach to site assessment and selection for both general housing and Gypsy and Traveller accommodation is appropriate and is justified. Thus, the vast majority of the proposed site allocations in the submitted plan are retained. Paragraphs 3.31 to 3.33 below identify the limited number of submitted sites which are not included in the plan for adoption and those sites for which site capacity and delivery assumptions have been changed. The housing trajectory, now in Appendix 4 of the GNLP, has been amended to reflect these changes.
- The plan provides a 5-year supply of 12,632 homes for the Greater Norwich area, which is a supply of 5.77 years. It also demonstrates a 5-year supply of Gypsy and Traveller pitches.
- The revised Monitoring Framework, which now includes targets, triggers, and actions and is in a separate third document of the plan, provides a sound and effective basis for monitoring the Plan.

3.31 The following sites have been removed from the plan as the result of the examination:

- i. South of Le Neve Road, Marsham GNLP2143 for 35 homes due to impacts on the neighbouring church.
- ii. Mill Road Reedham GNLP3003 for 30 homes due to poor access.
- iii. The contingency site at Costessey.
- iv. Other housing sites removed by landowners:
  - Ber Street (CC2), Norwich for 20 homes.
  - Lower Clarence Road (CC13), Norwich for 45 homes
  - Ipswich Road Community Hub (R2), Norwich for 15 homes
  - Land north of Springfield Way and west of Dereham Road, Hingham for 20 homes.

3.32 With regard to the larger sites with planning permission, and those allocated in Area Action Plans, the Inspectors have made some alterations to the supply and delivery assumptions. There has been a loss of 250 dwellings the Norwich RFU site as there was no evidence to support relocation plans during plan period, along with a loss of 180 dwellings at North Rackheath as some of the homes in the AAP are no longer considered likely to be delivered by 2038.

3.33 In addition, site capacity and delivery assumptions have been changed from the submitted plan on some sites. This includes East Norwich (3,000 homes are now

assumed to be delivered in the plan period) and White House Farm, Sprowston, where there has been a loss of 660 dwellings from the delivery trajectory to 2038.

- 3.34 The Inspectors overall conclusion is that with inclusion of their recommended main modifications the plan is sound and “*the LPAs will be able to confirm that a five-year housing land supply for the Plan area has been demonstrated in a recently adopted plan*”. This is an excellent outcome as due to recent changes to the NPPF, this 5-year supply will be fixed for 5 years on adoption of the plan.

#### **4. Proposed action**

##### Securing Plan Adoption

- 4.1 The publication of the inspector’s report enables the councils to proceed to adoption of the GNLP. It requires the main modifications to be included in the adopted plan to make it sound. As stated above, these changes are binding - a plan can only be adopted with their inclusion.
- 4.2 The decision to adopt the plan must be made by each of the three councils. Full Council meetings are scheduled in each authority in March 2024. Adoption of the GNLP involves the publication of an adoption statement the day after each authority adopts the plan. This is accompanied by the GNLP as amended by the inspectors’ modifications, the inspector’s report, the sustainability appraisal, an environmental adoption statement and the habitats regulation assessment. These are available from [here](#). An Environmental adoption statement will also be available.
- 4.3 Legal challenges can be made within 6 weeks of the adoption of a local plan. An application to the High Court can be made either on the grounds that the document is not within the appropriate power of the LPA, or that a procedural requirement has not been complied with.
- 4.4 Once the risk of legal challenge has passed, the production of the final online and hard copy documents to publication standard can be undertaken.

#### **5. Other options**

- 5.1 All local planning authorities are required to produce a Local Plan. As there are clear benefits to working together with our neighbours in Norwich and South Norfolk to produce a joint plan, and the case for adoption is concluded in this report to be overwhelming, there are no realistic options to adoption of the GNLP.

#### **6. Issues and risks**

- 6.1 **Resource Implications** – Work on the plan first began in 2016 and has involved a significant commitment of resources. Adopting the GNLP marks a significant achievement, and the new plan will play an important role in guiding the creation of new jobs and homes whilst protecting the environmental assets of the area.

- 6.2 **Legal Implications** – The preparation and content of a local plan needs to accord with a range of legal and regulatory provisions. Project assurance, including taking relevant legal advice, has been undertaken as part of the plan-making and examination process.
- 6.3 **Equality Implications** – The plan encourages growth of vibrant and healthy communities with good access to jobs, services and facilities, helping to reduce disparities between the life chances of disadvantaged and other communities. New communities will be well-integrated with existing communities and will be safe and attractive places to live. An [Equality Impact Assessment](#) has assessed the impact of the local plan on the community and its potential to address socio-economic inequality.
- 6.4 **Environmental Impact** – A Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), and a Habitat Regulations Assessment (HRA) support the GNLP. The SA has explicitly considered the policies and sites allocated through the plan. The HRA has focused on nutrient neutrality and visitor pressure on internationally protected habitats.
- 6.5 The GNLP's Climate Change statement sets out how the plan seizes the opportunities available locally to promote low carbon development and address climate change. This includes the location of development and its design, with policies reducing the need to travel, promoting water efficiency, sustainable energy provision and recycling, and requiring development to be adapted to the address the impacts of climate change, including flood risk. The plan has a particular focus on ensuring that new development provides biodiversity net gain and new green infrastructure (GI) as part of a wider GI network.
- 6.6 **Crime and Disorder** – This report has implications for the council's crime and disorder considerations in that new development is required to reflect best practice to deter crime through its design and layout. In addition, the supporting text in the plan advises planning applicants to contact Norfolk Constabulary for guidance on crime and safety issues.
- 6.7 **Risks** – Since the plan has successfully been through examination and has been found to be sound subject to including the Inspectors' main modifications, risks relate to non-adoption of the plan. Non-adoption of the plan would lead to more speculative development in unplanned locations, potential government intervention in plan-making and would be likely to reduce both government and private investment in the area. Such risks will be addressed by adoption of the plan.

## 7. Conclusion

- 7.1 Overall, the inspectors' report is very positive, and the successful development of an updated joint strategy is a considerable success.
- 7.2 Adoption of the GNLP will allow us to implement evidence-based policies for our area through a plan which the partnership has invested considerable time and money in. While it has been a long process to get the GNLP to adoption, national

data shows that the seven years taken is the average under the current local plans system.

- 7.3 The GNLP builds on our extensive experience of joint working to identify where growth and new infrastructure is needed from 2018 to 2038. Plan adoption will keep us at the forefront of joint planning nationally which will help us to attract investment into the area, including Government funding, especially for infrastructure and regeneration programmes. Only one other partnership, Central Lincolnshire, has adopted a review of a joint plan.
- 7.4 The plan will deliver high-quality homes, along with a broad range of new jobs and supporting infrastructure, including green infrastructure, roads, schools, health care facilities and broadband connectivity. The plan includes a range of policies which will ensure that the development is in the best locations to support our existing communities and to create thriving new communities, as well as making sure that development is well-designed, and is sustainable.
- 7.5 The councils' strategy for the distribution of the majority of growth in the Strategic Growth Area focussed on the Norwich Urban Area and the Cambridge Norwich Tech Corridor, with some growth also focussed at other levels of the hierarchy to support thriving communities and the retention of services, has been fully endorsed. This further develops the long-term strategic approach set through the JCS. It also allows for a future focussing of growth on new settlements if this is the path which the authorities choose to take in their next plan or plans.
- 7.6 Adoption of this coherent strategic plan will mean that Greater Norwich will have an up-to-date local plan with a clear and sustainable policies and site allocations that will promote environmental protection, investment in our economy and the provision of the homes, jobs and infrastructure we need, including through the continued use of pooled CIL monies.
- 7.7 Importantly, recent revisions to the NPPF mean that for 5 years after adoption of the plan, there will be no need to annually demonstrate a five-year land supply for Greater Norwich. This will significantly reduce the pressure to grant permissions for non-allocated housing sites that currently exists as there is not, at this point, a 5-year land supply. This further increases the benefits of having an adopted plan.
- 7.8 There could potentially be some very serious negative impacts associated with not adopting the plan. Firstly, the uncertainty created by not having an adopted strategy and not having a 5-year land supply would increase the prospect of speculative or inappropriate proposals being submitted, resulting in "planning by appeal". Secondly, there is a very real threat of Government intervention for those LPAs which are not making sufficient progress on their plans to have an adopted plan in place by December 2026. Ten local planning authorities had the Secretary of State intervene in their local plan process in the last three months of 2023. Seven were required to update their Local Development Schemes to make clear when their plans are to be adopted, whilst three (Spelthorne BC, Erewash BC and West Berkshire Council) were instructed not to withdraw their draft plans from examination. It seems highly likely that there would be Government intervention if one or more of the Greater Norwich authorities were not to adopt the GNLP. Given

the amount of consultation it has gone through and the successful outcome of its examination, it is also possible that there could be a legal challenge and significant resulting costs to non-adoption of the GNLP.

- 7.9 Having received a highly positive Inspectors' Report endorsing the strategy and site allocations set out in our plan, and taking account of the significant benefits of adoption and the major difficulties that would be created through not following that path, the case for adoption is overwhelming.

## **8. Recommendations**

8.1 It is recommended to Cabinet that Council:

1. notes the inspectors' report (at Appendix A) and the required main modifications in appendices 1 to 5 (available from [this link](#));
2. adopts the modified GNLP (documents J2.1 to J2.11 inclusive available from [this link](#)); and
3. delegates authority to the Assistant Director for Planning to publish the Adoption Statement and accompanying documents, making the GNLP part of the Adopted Local Plan for Broadland.

## **Background papers**

Report to Broadland District Council, Norwich City Council and South Norfolk Council, by Mike Worden BA (Hons) Dip TP MRTPI and Thomas Hatfield BA (Hons) MA MRTPI, 19 February 2024