

# Greater Norwich Development Partnership

**Date:** Friday 10 July 2020

**Time:** 11.00 am

**Venue:** to be hosted remotely by video link

## **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

Jonathan Pyle (Comms)

Graham Nelson

Phil Morris

Matt Tracey

Marie-Pierre Tighe

Live stream at: [https://www.youtube.com/channel/UC\\_kzIWwc-LQJDHZkJqDwOKQ/videos](https://www.youtube.com/channel/UC_kzIWwc-LQJDHZkJqDwOKQ/videos)



**NORWICH**  
City Council



**Norfolk** County Council



**Broads Authority**  
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## AGENDA

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| 1. To receive Declarations of Interest   |         |
| 2. Apologies for Absence   |         |
| 3. <a href="#"><u>Minutes of the meeting held on 6 January 2020</u></a>  | 4       |
| 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. <a href="#"><u>Draft Greater Norwich Local Plan (Regulation 18) Consultation: High-Level Summary</u></a>      | 11      |
| 7. <a href="#"><u>Draft Greater Norwich Local Plan Revised Timetable</u></a>                                     | 59      |
| 8. <a href="#"><u>Emerging Government Policy and the Greater Norwich Local Plan (GNLP)</u></a>                   | 63      |

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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](mailto:mike.burrell@norfolk.gov.uk)



Please call Mike Burrell, Greater Norwich Planning Policy Manager on 01603 222761 or email [mike.burrell@norfolk.gov.uk](mailto: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:** Monday 6 January 2020

**Time:** 2.00 pm

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

## **Board Members:**

### **Broadland District Council:**

Cllr Lana Hempsall, Cllr Shaun Vincent (Chairman)

### **Norwich City Council:**

Cllr Kevin Maguire, Cllr Alan Waters

### **South Norfolk Council:**

Cllr Florence Ellis, Cllr John Fuller, Cllr Lisa Neal

### **Norfolk County Council:**

Cllr Stuart Clancy, Cllr Andrew Proctor, Cllr Martin Wilby

### **Broads Authority**

Cllr Melanie Vigo di Gallidoro

**Officers in attendance:** Mike Burrell, Phil Courtier, Trevor Holden, Helen Mellors, Phil Morris, Graham Nelson, Jonathan Pyle, Marie-Pierre, 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. 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 attending Council when GNLP matters were considered.

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

Cllr Stuart Clancy declared that he had a family interest in a site in the area.

## **2. APOLOGIES FOR ABSENCE**

Apologies were received on behalf of Cllr Barry Stone and Cllr Mike Stonard.

## **3. MINUTES**

The Minutes of the meeting held on 26 September 2019 were agreed as a correct record.

## **4. QUESTIONS FROM THE PUBLIC**

The Board noted the following questions from members of the public and the Officer responses:

### **Question 1 from Cllr Julian Halls**

*Can the Board please explain what exactly is meant by 'reasonable alternatives' as outlined in the report and what weight will the respective planning departments be expected to give to developers using this category in applications?*

*By way of illustration the preferred allocations for Wymondham are for a minimum of 100 houses but the report goes onto give a list of so called 'reasonable alternatives' which total nearly 10,000. How can this be in anyway considered a reasonable alternative?*

*Developers will simply see this as an opportunity and planning Departments will be under pressure to accede to applications otherwise what is the point of them being listed.*

### **Officer response**

The Sustainability Appraisal and plan-making process require the consideration of reasonable alternatives to help inform choices and demonstrate why the preferred options have been chosen.

Question 42 of the consultation specifically asks for comments on growth issues for Wymondham and the other main towns. Comments received will help to firm up the final Plan for submission to the Government.

Any planning applications determined before the adoption of the GNLP, scheduled for late 2022, will be determined in accordance with the current adopted Plan unless there are material considerations that indicate otherwise.

The inclusion of sites as reasonable alternatives in the emerging GNLP would be expected to have very limited weight in determining planning applications.

**Question 2 from Graham Everett**

- a. *Can information be provided regarding the review of CIL and whether potential changes will only be implemented to applications submitted post adoption of the GNLP circa August/September 2022 or to application approved prior to the adoption of the Plan?*
- b. *Will there be an opportunity for members of the public to comment on proposed changes to CIL as part of the GNLP consultation?*

**Officer response**

- a. A commitment has been made by the Greater Norwich Development Partnership for the Community Infrastructure Levy (CIL) to be reviewed in parallel with development of the Greater Norwich Local Plan (GNLP). Any changes to the CIL will apply to planning applications determined after the reviewed CIL is adopted, which is currently anticipated for August/September 2022 in line with the GNLP.
- b. The CIL review includes its own separate consultation and examination process, so the main opportunity for members of the public to comment will come through the CIL review itself rather than through the GNLP consultation. The CIL consultation will follow the forthcoming consultation on the GNLP which includes evidence on viability which will help to shape the CIL review. Anyone is free to comment on that viability evidence through the GNLP consultation.

**Question 3 from Alan Presslee of Cornerstone Planning on behalf of Norfolk Homes**

*Ref. site GNLP0596; Norwich Road, Aylsham. Assessment of sites promoted in Aylsham has not taken full and proper account of all relevant information, leading to - we believe – incomplete evaluation of the relative merits of respective sites. Can you therefore confirm that the pending consultation will - in allowing us to submit further clarifying/supplementary information – facilitate a genuine opportunity for officers to properly review/re-evaluate the relative merits of sites identified as “Proposed Allocation” and “Reasonable Alternative”, and that such does not prejudice the prospect of changes to these in light of new information submitted?*

**Officer Response**

The identification of the proposed site as a “reasonable alternative” in the upcoming consultation does not preclude its further promotion for allocation. Any new site information submitted will be assessed, indeed entirely new sites could be submitted into the process as well. Sites are assessed on their individual merits, and new information submitted during the upcoming Regulation 18 consultation will be given full and proper consideration.

**Question 4 from Mr. Milliken of Easton Parish Council**

The following questions were submitted for the meeting but were not addressed as they did not reach the relevant officers. The questions and officer responses are addressed here:

Q. How can this be regarded as a complete plan when SNC have chosen to engage in its own plan which later feeds into the GNDP after the GNDP has been consulted on?

The planning system allows flexibility in terms of the coverage of plans. The current local plan is made up of a number of documents: the Joint Core Strategy, setting out the strategic framework for growth; separately produced site allocation, area action and neighbourhood plans providing the sites to meet that strategic framework; and development management policies.

In the case of the emerging plans, the Greater Norwich Local Plan (GNLP) is the new strategic framework document. It includes proposed allocations higher up the settlement hierarchy and sets the amount of growth required in the village clusters in South Norfolk at a minimum of 1,200 homes in addition to the current commitment of 1,349. This figure will be consulted on through the forthcoming GNLP consultation.

The South Norfolk plan will provide the sites in village clusters for those homes. It will be consulted on separately.

Q. What is the effect of this decision in relation to the GNDP's legal standing and has legal advice been sought?

Legal advice has confirmed that the approach is sound. In line with the advice, the Local Development Scheme for South Norfolk will be revised to include the new plan.

Q. Why has Easton not been included as a site for consultation.

Easton has not been included as a location where a consultation event will be held as it is important to make cost-effective use of resources and have a geographical spread of events – an event will be held in nearby Costessey.

Q. Why have officers continued to refuse to provide a written response direct to me after I raised concerns at the last meeting on the 26th September 2019. Your chair requested that you formally respond to my question, why have the officers involved in this matter refused to comply with the chairs request? I note point 4 of the minutes just release however this does not provide a full response to my question as to the lawfulness of the governance of these meetings.

The need for a written response was not recorded in the minutes of the September GNDP meeting. However we re-iterate the minutes which state that "The Monitoring Officer confirmed that the Greater Norwich Development Partnership (GNDP) was a body that advised and gave a steer and made recommendations to its constituent authorities. The GNDP was not a decision making body and is not governed by the Local Government Act 2000, but it had been decided in the interests of transparency that its meeting would be held in public".

### **Correspondence from Mr Stephen Eastwood about site GNLP0379 on Post Office Road, Lingwood**

Whilst not expressed as a question, concerns relate to the increase in the scale of the site since the first Regulation 18 consultation in early 2018. Explanation is sought by Mr Eastwood for how site GNLP0379 can now be consulted upon with an extended boundary. He also sought clarity on the exact number of homes and the extent of green space that could eventually be provided on the area of land opposite Millennium Green on Post Office Road.

#### **Officer Response**

This is identified as a “preferred site” for 50 to 60 homes with open space. Like all allocations, it is not possible to be absolutely definitive until a planning consent is granted - about housing numbers or the amount of open space to be provided. The changes to the original submission are the consequence of ongoing plan-making work since the last public consultation in 2018 to address potential highways issues and to ensure that development would provide a suitable setting for the church by providing a neighbouring open space. We look forward to receiving comments on the site through the upcoming consultation to assist in shaping the submission version of the Plan.

A Member of the public advised the meeting that his parish council had submitted a question to the Board, but this had not been included in the Agenda papers or answered.

In response, the Chairman confirmed that this matter would be looked into and responded to as appropriate.

## **5. APPROVAL FOR DRAFT GREATER NORWICH LOCAL PLAN (REGULATION 18) CONSULTATION**

The report proposed that the Greater Norwich Development Partnership Board recommend to the constituent authorities that the draft Greater Norwich Local Plan (GNLP) should be consulted on from 29 January to 16 March 2020.

The consultation draft GNLP was made up of two documents: the GNLP Strategy document, which contained the planning strategy for growth in Greater Norwich from 2018 to 2038 and the GNLP Sites document, which contain the policies for the sites that were proposed to be allocated for development to help deliver the GNLP.

At the last Board meeting in September 2019 the Board raised a number of issues with the GNLP as presented and asked that further work be undertaken on the Plan and supporting documentation, this had included:

- Looking at the Plan provision which was in line with the defined Government criteria, the objectively assessed need and a ten percent buffer;
- Clarifying the level of small sites;
- Engaging a copywriter to assist with the wording of the document;



- Assessing the draft Plan alongside the criteria in Towards a Strategy, including the overall number of homes, hierarchy and small sites;
- Reviewing the key messages and current thinking on climate change; and
- Updating the consultation strategy.

The following had been considered when drafting the content of the Plan:

- ensuring that the new homes were delivered;
- promoting inclusive economic growth;
- encouraging low carbon development;
- to deliver an enhanced environment as a result of development;
- to ensure that the infrastructure needed to support growth was provided.

A Member advised the meeting that it had been right to defer the consultation to undertake further work, as the documents now clearly set out what the Board were seeking to achieve and they would give the public a rational and cogent Plan to comment upon. He added that the reason that South Norfolk was preparing a separate Village Clusters Housing Allocations Document was due to the more complex housing market in the District, which had 97 parishes in clusters. This needed a bespoke local approach and a greater focus on smaller sites, within the overarching Greater Norwich Plan. He requested that greater emphasis be placed in the report on the soundness of the argument for a separate Village Cluster document for South Norfolk.

Another Member noted the positive start to the consultation process and welcomed the views of residents. He emphasised that Norwich was the key driver of economic growth, but that 25 percent of office space in the city had been lost due to permitted development rights and that Article 4 directions could be used to limit this. He noted that there was a tension between urban concentration and rural dispersal, but stressed that the City Deal should be the benchmark for building out brownfield sites in Norwich, as well as urban areas across the whole of Greater Norwich. He did however, question if the measures for a low carbon future set out in the Strategy were robust enough.

A Member complemented the Greater Norwich Planning Policy Manager and his team for all their hard work in putting together such a well drafted Plan. She emphasised that the proposed growth and development represented an opportunity for young people who did not yet have a home of their own to get on the property ladder. The GNLP would also complement the recently launched Industrial Strategy.

Another Member emphasised that delivery was a crucially important part of the Plan, as was the wider infrastructure provision and economic growth.

In summing up, the Chairman noted the extension of the Plan to 2038 and that consultation feedback would be crucial in shaping a robust and deliverable Plan.

## **RESOLVED**

to recommend that the constituent authorities endorse the proposed content and its finalisation (under delegated authority to Directors) of the draft Greater Norwich Local Plan (Regulation 18) for consultation.

### **6. DRAFT (REGULATION 18) PLAN CONSULTATION – COMMUNICATIONS PLAN**

This report presented the proposed Communication Plan for the forthcoming draft Greater Norwich Local Plan (Regulation 18) consultation that would take place between 29 January and 16 March 2020.

Consultation events would take the form of roadshows held in libraries, council buildings and village halls and in The Forum in Norwich, during afternoons and evenings. Exhibition packs featuring display boards, pop ups and posters would be displayed at each venue.

## **RESOLVED**

that the Board endorses the approach to the consultation to partner authorities.

### **7. DRAFT GREATER NORWICH LOCAL PLAN (REGULATION 18) REVISED TIMETABLE**

The report presented a proposed revised timetable for the remaining stages of the Greater Norwich Local Plan (GNLP). The consultation has been deferred previously due to the need to resolve issues raised by partner authorities.

As a consequence of the deferment of the consultation (as noted above at Minute 5) the timetable for adoption had been extended to August/September 2022. The Local Development Schemes would, therefore, need to be amended.

## **RESOLVED**

that the Board endorses the timetable for progressing the GNLP and that districts update their Local Development Schemes accordingly.

The meeting closed at 2:46 pm.

## Greater Norwich Development Partnership (GNDP)

|                     |  |
|---------------------|--|
| <b>Report title</b> | <b>Draft Greater Norwich Local Plan (Regulation 18)<br/>Consultation: High-Level Summary</b> |
|---------------------|--|

|             |                                  |
|-------------|----------------------------------|
| <b>Date</b> | <b>10<sup>th</sup> July 2020</b> |
|-------------|----------------------------------|

### **Summary**

This report provides a high-level summary of representations received through the Regulation 18 consultation on the draft Greater Norwich Local Plan (GNLP) held in early 2020.

Section 1 provides information on the number of representations received and feedback from the consultation events. It highlights those policies and sites on which the highest number of representations were made. There is also a summary of new/revised sites that were submitted.

Section 2 deals with the main issues raised on the strategy. It summarises these and sets out an initial view on the main actions in addressing these.

Section 3 covers the next stages for plan-making. Topic papers will be produced which will look at issues raised through the consultation in more detail. The timing of these will be dependent on decisions made on the timetable paper being considered by the GNDP on this agenda.

### **Recommendation**

**GNDP members are recommended to note and comment on:**

- 1. the consultation attendance and feedback;**
- 2. the proposed actions to be taken in the light of the issues raised in the consultation response.**

## **Background**

- 1.1 The GNLP has been in preparation since 2016 and has undergone several stages of consultation. A full draft plan was published for consultation from 29 January until 16 March 2020.
- 1.2 The draft GNLP comprises:
  - (a) a strategy document which contains the planning strategy for growth in Greater Norwich from 2018 to 2038, including thematic policies, and
  - (b) a site allocations document containing sites proposed to be allocated for development to help implement the growth strategy. It contains site specific policies for all sites other than the village clusters in South Norfolk. A separate allocations plan is being developed by South Norfolk Council for these village cluster sites, which will come forward in due course.
- 1.3 Once adopted, the GNLP will supersede the Joint Core Strategy for Broadland, Norwich and South Norfolk, and the site allocations plans for Norwich, Broadland and part of South Norfolk.

## **Section 1 The Consultation**

- 1.4 The consultation was completed prior to entering lockdown. Whilst this has the advantage of consultation events not being impacted by the current crisis, it has also meant that the consultation responses do not address the impact of Covid19 on emerging policies.
- 1.5 There was a good level of response to the consultation. A broad range of views were expressed from a wide cross section of community, political and professional organisations and large numbers of individuals.
- 1.6 As summarised in table 1 below, many more respondents, largely individuals, commented on the sites than the strategy. However, partly due to the large number of representations made on a broad range of issues by community, political and professional organisations, the number of representations received for the strategy and sites were broadly similar. While there were limited representations on the evidence base, these were largely detailed and technical.

**Table 1 Numbers of representations**

|                 | No. of respondents     | Total reps   | Method       |              |           | Support    | Object      | Comment      |
|-----------------|------------------------|--------------|--------------|--------------|-----------|------------|-------------|--------------|
|                 |                        |              | Web          | Email        | Paper     |            |             |              |
| <b>Strategy</b> | 242                    | 1,566        | 568          | 983          | 12        | 356        | 427         | 783          |
| <b>Sites</b>    | 753                    | 1,761        | 1,186        | 526          | 46        | 538        | 777         | 446          |
| <b>Evidence</b> | 7                      | 12           | 1            | 11           | 0         | 0          | 3           | 9            |
| <b>Totals</b>   | <b>N/A<sup>1</sup></b> | <b>3,339</b> | <b>1,755</b> | <b>1,520</b> | <b>58</b> | <b>894</b> | <b>1207</b> | <b>1,238</b> |

- 1.7 Appendix 1 sets out tables showing the most commented on sites and policies.
- 1.8 Tables showing the number of representations by policy and site are available in appendix 2.
- 1.9 Section 2 of this report covers the main issues raised through the consultation.

**Consultation events**

- 1.10 Over 1,150 people attended the 14 consultation events. This figure is an undercount as it was very difficult to monitor attendance at the busiest events. It compares to 1,400 people who attended the 29 roadshows for the Growth Options consultation in early 2018.
- 1.11 Most attendees were in the 45+ age range, with younger people targeted through social media.
- 1.12 The number one issue raised was health care provision, with the need for other infrastructure also a concern. Additionally, the need for a better public transport service was regularly raised.
- 1.13 Although the great majority of people recognised the need for new housing, there was some questioning of the amount of growth required and whether it is suitable in the proposed locations. There was general support for more affordable housing and providing a range of house types, including those suitable for older people.
- 1.14 There was some criticism of the consultation process and web site.

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<sup>1</sup> Note that a response is counted as one submission in the online consultation system. A submission can then have a number of representations that sit within it. Therefore, no total figure has been given for respondents because some respondents will have been counted twice as they will have responded to both strategy and sites documents in the same submission. If an agent made more than one response, i.e., they were responding on behalf of multiple clients, they will be recorded multiple times as respondents in the online consultation system.

1.15 Appendix 2 contains feedback from specific consultation events.

### New and revised sites

1.16 Table 2 below covers the new sites of over 0.25 ha submitted through the consultation.

**Table 2 New Sites**

|                           | <b>Sites<br/>over<br/>.25 ha</b> | <b>Total<br/>ha</b> | <b>Notes</b>  |
|---------------------------|----------------------------------|---------------------|---|
| <b>Broadland</b>          | 37                               | 171                 | <p>This includes the following sites:</p> <ul style="list-style-type: none"> <li>• One site in Lingwood of 4ha for live work units;</li> <li>• One 5ha retirement village in Reepham;</li> <li>• One 11ha mixed housing/employment site in Taverham;</li> <li>• One 0.84ha site in Reepham for a school playing field (to remove the existing school playing field from the REP1 allocation to facilitate greater housing numbers);</li> <li>• Two sites in Horsham St Faith for employment use (one 6.98ha, one 0.74ha).</li> </ul>      |
| <b>Norwich</b>            | 0                                | 0                   | N/A   |
| <b>South<br/>Norfolk*</b> | 24                               | 635                 | <p>This includes the following sites:</p> <ul style="list-style-type: none"> <li>• One 8.5ha employment-led mixed use in Hethel;</li> <li>• One 20ha housing site in Diss which includes a school;</li> <li>• One site in Hethersett of 5.5ha for a care village;</li> <li>• One housing site in Hethersett of 28.5ha which includes a school;</li> <li>• One site in Hingham of 4.3ha for community woodland;</li> <li>• One site in Roydon of 2ha for public open space;</li> <li>• One mixed use 2 ha site in Wymondham and</li> </ul> |

|              |           |            |   |
|--------------|-----------|------------|---|
|              |           |            | <ul style="list-style-type: none"> <li>• One overall proposal for the Silfield Garden Village bringing together a number of existing GNLP sites.</li> </ul> |
| <b>Total</b> | <b>61</b> | <b>806</b> |   |

\*Excludes SNC villages clusters sites.

- 1.17 Thirty-eight revisions to sites were submitted. Many of the revised sites now offer different access points, with some increased and some decreased sizes. One of these is a revision to a carried forward allocation in Reepham. Some of the sites are preferred sites and reasonable alternatives in the draft plan.
- 1.18 The process for consulting on these sites will be determined largely by decisions on the timetable report which is also on this agenda.

## **Section 2 The Issues Raised**

- 2.1 Officers will shortly begin work on topic papers which will assess how to address the issues raised through the consultation and propose changes to the pre submission (Regulation 19) version of the GNLP for member consideration.
- 2.2 The left-hand column of table 3 below highlights the most significant issues raised through the consultation and the right-hand column has the initial officer view on actions required in response. The responses will be developed further through work on the topic papers (see section 3).

**Table 3 GNLP officer team’s current consideration of the most significant issues raised in the consultation**

| Plan Section                 | Details   | Initial response  |
|------------------------------|---|---|
| <b>Introductory Sections</b> |   |   |
| Profile                      | A wide range of helpful suggestions were made to improve the accuracy of the profile, especially on historic and natural environment issues and emphasising the role Greater Norwich plays in the national economy.   | Action: Clarify issues raised through a topic paper on the Introductory Sections of the plan. This will propose amendments to the Strategy where required in the light of consultation, the National Planning Policy Framework (NPPF) and local evidence. |
| Vision + Objectives          | A wide range of helpful suggestions were made to improve the breadth of the Vision and Objectives, particularly on health and wellbeing/active lifestyles (further policy coverage on this is also required).   |   |
| Delivery Statement           | There was significant support for the inclusion of a delivery statement, mainly from the development industry. Some opposition, mainly from the Green groups, the CPRE and individuals, stated that the GNLP places too much focus on delivery and economic growth at the expense of environmental protection.  |   |
| Climate Change Statement     | <p>There was significant support from a wide range of organisations and individuals for the inclusion of a climate change statement, though with some scepticism over whether the GNLP would achieve the stated aims and/or whether these go far enough. A changed focus was sought from a variety of respondents on:</p> <ul style="list-style-type: none"> <li>• Setting plan carbon reduction targets and addressing wider carbon reduction targets;</li> <li>• Reducing development in villages to reduce the need to travel;</li> <li>• Transport policy with a stronger focus on modal shift needed. The view from some was that the recent Heathrow ruling on emissions questions including the Norwich Western Link (NWL) and other roads such as the A47 in the GNLP;</li> <li>• Environmental standards (particularly water and energy in policy 2);</li> <li>• Including a specific climate change policy instead of the draft’s statement approach which signposts policies addressing different aspects of GNLP climate change policy.</li> </ul> <p>Some aspects of the above were stated to be soundness issues.</p> |   |
| <b>The Growth Strategy</b>   |   |   |
|                              | <b>Too low</b>  |   |



|  |  |   |
|--|--|---|
| <p>Overall Housing Numbers</p>               | <p>A strong view was expressed, with some (mainly from the development industry) questioning soundness, that the housing numbers in the GNLP should be raised to take account of the City Deal, provide a larger buffer and to correct errors in interpretation of the standard methodology.</p> <p><b>Too high</b><br/>An equally strong view, mainly from the CPRE, some parish councils and individuals, was presented that the GNLP should:</p> <ul style="list-style-type: none"> <li>• use the more up to date ONS 2016 household projections rather than the 2014 projections required by the government’s standard methodology;</li> <li>• use more accurate, lower projections;</li> <li>• reduce the buffer and include windfalls;</li> <li>• include phasing so that homes allocated in existing plans will be developed first.</li> </ul> <p>Some objections stating that the housing numbers are too high questioned soundness.</p> | <p>As currently required by the government, the draft GNLP uses the 2014 ONS household projections as there are not the exceptional circumstances to justify an alternative approach. It also applies a 9% buffer without relying on windfall to enable delivery.</p> <p>Action: Matter to be kept under review and addressed in the housing topic paper in the light of:</p> <ul style="list-style-type: none"> <li>- The new standard methodology due to be published to calculate objectively assessed housing needs. This was due to be published in June but has now slipped and is expected in autumn;</li> <li>- Updated evidence on likely delivery rates based on monitoring returns and engagement with industry;</li> <li>- Evidence that may be provided in the forthcoming Strategic Housing Market Assessment (SHMA) for Central and East Norfolk.</li> </ul> |
| <p>Location of Growth + Hierarchy Issues</p> | <p>Varied arguments were presented on the location of development with the most common being:</p> <ul style="list-style-type: none"> <li>• The proposed strategy may not deliver the need, especially in the north east growth triangle, so more growth should be placed elsewhere;</li> <li>• More focus is required on towns and Key Service Centres (KSCs), especially in Wymondham and the wider growth corridor and in Poringland, Brundall and Blofield;</li> <li>• Horsford should be a KSC rather than in a village cluster;</li> <li>• Sites should be allocated in Great + Little Plumsted village cluster;</li> <li>• To achieve a modal shift, new development allocations should be at locations close to, and transport integrated with, railway stations;</li> <li>• New Settlements should be included with less focus on urban extensions and/or growth in some towns (particularly Diss and Harleston);</li> </ul>             | <p>Action: Clarify issues raised through the topic papers on the Policies 1 (The Strategy) and 7 (Areas of Growth) of the plan. These will propose amendments to the strategy where required in the light of consultation, the NPPF and local evidence.</p>   |

|                                |  |   |
|--------------------------------|--|---|
|                                | <ul style="list-style-type: none"> <li>• There should be lower growth in villages as the current focus will generate travel and not support local services;</li> <li>• A Green Belt is required to focus growth;</li> <li>• Greater clarity is required on the services available at different levels of the hierarchy;</li> <li>• Delivery trajectories, particularly of brownfield regeneration sites, are unevidenced making it difficult to comment on likely delivery of the strategy;</li> <li>• A number of allocations are predicated on third party infrastructure investment which is not certain, risking undermining the delivery of the GNLP.</li> </ul> <p>Many of these arguments were considered to be soundness issues.</p> |   |
| <b>Sustainable Communities</b> |  |   |
| Landscape                      | There is a need for a review of the Strategic Gaps as the current evidence base is lacking. The NPPF requires the preparation and review of landscape policies to be underpinned by adequate, up-to-date and relevant evidence.  | No current action required. Policy 2 provides continued protection of long- established and evidenced Strategic Gaps. Their boundaries will be considered through Development Management policies.  |
| <b>Environment</b>             |  |   |
| Natural Environment            | Natural England's (NE) view is that Green Infrastructure (GI) and the Habitats Regulation Assessment (HRA) must be given more central prominence in the strategy, with policy 3 requiring significant revision. The policies need to explain in detail how and where GI will be delivered and the timescale for it, to deliver sustainable development and adaptation to the impacts of climate change and to make the plan sound in relation to HRA. This includes tariff implementation details. NE have offered to work with the local authorities in revising and expanding Policy 3 so it is comprehensive and robust.  | <p>Action: Ensure the vision, policies and implementation sections support GI provision and address the HRA, with clear coverage of delivery. Amongst other things, this could include changes to policy 3 to reflect:</p> <ul style="list-style-type: none"> <li>• the progress of the national requirement for biodiversity net gain; and</li> <li>• emerging county wide work exploring a possible tariff-based approach for mitigation at HRA protected sites.</li> </ul> <p>This will require a proportionate approach suitable for a high-level strategy which sets up the mechanisms to allow the delivery of GI to be agreed with NE.</p> |
| Historic Environment           | Historic England (HE) is concerned that the GNLP would not provide a sound planning framework for Norwich city centre, with some aspects unsound. Summary of issues:<br>1. DM Policies should be reviewed (see below);   | Action: Norwich CC officers to liaise with HE on its concerns This will lead to a decision about whether there is a need for an update to the City Centre   |

|                              |   |   |
|------------------------------|---|---|
|                              | <ol style="list-style-type: none"> <li>2. There is insufficient detail for the historic environment in policy 3;</li> <li>3. Key principles for development of brownfield sites needed to prevent harm to the historic environment of the city;</li> <li>4. A strategy for tall(er) buildings is required to provide the evidence to develop an appropriate tall(er) buildings policy for the plan;</li> <li>5. Indicative Site Capacities for some site allocations may not be realistic;</li> <li>6. There is a lack of evidence on the impact on historic environment for some sites;</li> <li>7. There is a lack of criteria or insufficient detail in the sites policies.</li> </ol> | <p>Conservation Area Appraisal or production of SPD.</p> <p>Again, this will require a proportionate approach suitable for a high-level strategy which sets up the mechanisms to allow effective consideration of specific site proposals.</p>  |
| <b>Infrastructure</b>        |   |   |
| Transport                    | A changed focus is sought from some on transport policy, with a stronger focus on modal shift needed (see also climate change statement above).   | Action: Consider the implications of the Heathrow ruling along with the wider implications of including strategic transport projects in the plan (see timetable report).  |
| <b>Homes</b>                 |   |   |
| Meeting all housing needs    | There is a need to ensure that sufficient and appropriate allocations are made and policies provided that meet the needs of all groups in society, especially the growing elderly population.   | <p>Action: Consider amending the plan to:</p> <ul style="list-style-type: none"> <li>• Take account from the Norfolk Strategic Planning Framework (NSPF) evidence on the needs for housing with care;</li> <li>• Include policy changes resulting from updates to the SHMA (see timetable report); and</li> <li>• Provide clarity on self-build policies</li> </ul> |
| Self-build                   | The Self/Custom-Build Homes part of the homes policy does not address the real need to respond to the demand and choice of bespoke homes in the locations where they are needed and is not sound or in the spirit of the NPPF.  |   |
| <b>Economy</b>               |   |   |
| Employment land availability | The view was expressed that the employment land supply is not flexible, diverse or ambitious enough and is made up of key sites which either have infrastructure constraints to delivery or have other environmental constraints to expansion. As such the emerging GNLP plan will conflict with the NPPF and is unsound.   | Action: Update evidence base on the economy and employment land supply to take account of the impact of Covid19 . The timing of this update will be critical as it will be important that it can adequately reflect the pattern of future economic changes we are likely to experience (see timetable paper).   |
| <b>Plan Making process</b>   |   |   |
| Duty to Cooperate (D to C)   | The scale of the Greater Norwich area and the level of growth have an impact upon need and delivery within surrounding districts.   | Action: Clarify through the topic paper on the Introductory sections of the plan that, in addition to the ongoing Norfolk Strategic Planning Framework (NSPF) which   |

|   |  |   |
|---|--|---|
|   |  | identifies that all Norfolk authorities will meet their own growth needs, whether a statement of common ground with relevant Suffolk authorities is needed showing that D to C issues have been covered.  |
| Strategic Issues  | To meet the NPPF test of sustainable development, there is an urgent need for the GNDP to work with Norfolk County Council, the LEP and all the constituent district authorities to consider how the whole county should enable sustainable development and resilience, coordinating with the NALEP economic and infrastructure strategies around a place-based spatial vision and strategy.   | Action: Clarify through the topic paper on the Introductory sections of the plan that this has been done through the NSPF and the use of the Industrial Strategy and other strategic policy and documents in formulating GNLP policy.   |
| Separation of S. Norfolk Village Clusters (SNVCs) from the plan | <p>A broad range of respondents (including the Green Party, Norwich Liberal Democrats, CPRE, some parish and town councils, some from the development industry and individuals) expressed opposition to this approach including:</p> <ol style="list-style-type: none"> <li>1. Fear of lack of scrutiny of SNVC sites and view that all sites should be considered in 1 plan;</li> <li>2. Opposition to internal inconsistency within the plan over the approach to South Norfolk (minimum housing numbers stated in policy) and Broadland villages (maximum numbers);</li> <li>3. Consider that there is a lack of evidence of the capacity of the SNVCs;</li> <li>4. Stating there is a lack of reasonable alternatives and evidence of the GNLP as an appropriate and sustainable strategy in relation to the villages.</li> </ol> <p>Some aspects of the above are considered a soundness issue.</p> | <p>Clarify through the topic paper on the Introductory sections of the plan that</p> <ol style="list-style-type: none"> <li>1. The Planning Regulations and the NPPF make it clear that a local plan does not need to be a single document. As a local plan document, the South Norfolk village clusters document will go through a full consultation and examination process so will be subject to full scrutiny;</li> <li>2. Consider whether the “minimum” reference can be amended in the Reg. 19 version of the GNLP as the SNVC plan progresses;</li> <li>3. Evidence will be provided for the Regulation 19 version to show the sites to meet the minimum 1,200 housing requirement in SNVCs;</li> <li>4. Reasonable alternatives for the growth strategy, including the village clusters, have been provided through the Reg. 18 stage and will be provided at the Reg. 19 stage.</li> </ol> <p>It will also be necessary to ensure that text throughout the plan makes it clear that the plan provides the strategy for the whole Greater Norwich area and that the majority of the sites are in its Site Allocations.</p> |

|   |  |  |
|---|--|--|
| <p>Need to review the DM policies with the strategy and sites</p> | <p>Historic England (HE) argues that in not reviewing the DM policies at the same time as the strategy, the plan could be found unsound. This is because the current DM policies are not aligned to deliver the strategic policies of the GNLP.</p> <p>Others argue that the numerous DPDs should be consolidated into a single joint Local Plan.</p>  | <p>The continued use of existing DM policies is regarded as sound as the Planning Regulations and the NPPF make it clear that a local plan does not need to be a single document.</p> <p>The current text of the strategy highlights where DM policy reviews and SPDs will be required to support the strategic approach. Clear timetables in the Reg. 19 version of the plan for the review of DM policies in the 3 districts would be helpful in reducing these concerns.</p>  |
| <p>Consultation quality</p>                                       | <p>Some argued that, despite consultation (with majority views expressed sometimes ignored), limited knowledge and understanding of the GNLP among the general public means that a Citizens' Forum should be established.</p> <p>Others argue that the consultation was of a low quality and could be subject to legal challenge because:</p> <ul style="list-style-type: none"> <li>• the complexity of process and the expertise required to make a useful response means that many members of the public are put off;</li> <li>• The consultation document and web portal are difficult to navigate and comment on, and there is no postal address for comments by letter;</li> <li>• The web site effectively provided different status to different evidence;</li> <li>• Consultation documents (e.g. the Water Cycle Study (WCS)) were updated during the consultation.</li> </ul> | <p>Action: Clarify through the topic paper on the Introductory sections of the plan that the GNLP is being taken through a statutory and democratic process to adoption including a number of consultations. It is not clear what role an unelected Citizens' Forum would play.</p> <p>The plan has to be a technical document to provide a planning strategy for use in producing more detailed planning policies, and ultimately for assessing planning applications. Equally the intention is that consultation will help to shape its content. Significant effort has been made to produce a clear and understandable plan. There will be an assessment of whether there are further opportunities to clarify the content.</p> <p>The website was produced by leading professionals in the field nationally. It has to have a lot of information on it to allow everyone to have their say on the wide number of planning issues and sites to be considered in an area with over 400,000 people. Every effort has been and will be made to make the consultation website accessible and 1,755 representations were received as</p> |

|   |   |  |
|---|---|--|
|   |   | <p>web submissions. Email and letter submissions were also accepted. This was clearly stated on the website.</p> <p>No different status was provided to different documents.</p> <p>In the case where evidence updates were required this was clearly signposted at the start of the consultation.</p>   |
| Responses to previous consultations   | CPRE and a number of individuals argue that the draft plan has ignored previous consultation responses and large proportions of public opinion have been disregarded, particularly in relation to overall housing numbers, the phasing of development and the desire for a Green Belt to be established.  | Action: Ensure that the plan does take account of the wide range of responses received on the broad range of issues it covers, whilst also noting that the plan must comply with NPPF requirements such as meeting overall housing numbers and ensuring the delivery of housing development by allowing a flexible rather than a restrictive (phasing led) approach. |
| Settlement Boundaries   | The opportunity to present alterations to current small sites development boundaries process is unclear. An opportunity to discuss development boundaries is an important part of the process of making an up to date plan.   | This will be addressed through consultation prior to Reg. 19 submission (see timetable paper).   |
| <b>Evidence</b>   |   |  |
| Habitats Regulation Assessment (HRA), Green Infrastructure (GI) and the Water Cycle Study (WCS) | <p>Natural England (NE) and the Environment Agency (EA) state that studies must be completed to inform stronger environmental policy and meet legal obligations for protected sites. The RSPB took the view that the HRA recommendations are based on incomplete evidence and as such are unreliable.</p> <p>NE does not consider that it is possible at this stage to conclude no adverse effect upon the integrity of any HRA site arising from the GNLP alone, specifically -</p> <p><b>HRA</b></p> <ul style="list-style-type: none"> <li>• Tariffs will be needed to fund mitigation at HRA protected sites;</li> <li>• Suitable Alternative Natural Greenspace (SANGS) + GI improvements have not been covered adequately.</li> </ul> <p><b>Air Quality</b></p> | Action: Studies will be updated and completed. The HRA and contributory and dependent environmental studies will need to be completed and inform revisions to environmental policies. There are some questions over the timing of additional evidence work on viability and the economy resulting from the current economic situation (see timetable paper).         |

|                             |  |  |
|-----------------------------|--|--|
|                             | <p>The Norwich Western Link (NWL) should be considered in combination with other Policy 4 infrastructure that have the potential to affect designated sites through increases in air pollution.</p> <p><b>Water Resources</b></p> <p>Future iterations of the HRA must recognise the need for planning policies to support water efficiency.</p> <p><b>Waste Water</b></p> <p>The HRA will need to examine if the Local Plan contains clear wording in relation to assuring timely delivery of required infrastructure and treatment capabilities for phosphate, ammonia and nitrogen.</p> |  |
| Viability Study             | Significant questioning of the viability study from the development industry, particularly in relation to affordable housing and typologies (especially brownfield sites).   |  |
| Economy                     | Updated evidence required on the economy due to impact of Covid19.   |  |
| Quality of evidence overall | There is a lack of evidence to support the approach taken to development and an academic peer review of evidence is required for the plan to be sound.   | Ensure adequate evidence, along with explanation of how this has informed policy, is submitted to the Planning Inspectorate (PINs). It is PINs who are responsible for examining the plan. |

### **Section 3 The next steps**

- 3.1 In progressing towards the Regulation 19 pre-submission version of the plan and then submission of the plan to the Secretary of State, officers will consider the Regulation 18 consultation comments made through a series of topic papers.
- 3.2 These topic papers will initially provide advice for members on how draft plan policies should be amended in the next version of the plan. The topic papers will then be adapted and submitted with the plan to the Secretary of State. They will justify the GNLP approach by providing further detail than will be in the concise plan itself.
- 3.3 A consultation report, covering all stages of the consultation, will also be updated to include feedback from the draft plan consultation. This will be submitted with the GNLP.



## **Appendix 1 Representations received - Questions with the most responses**

### **Strategy Document (excluding overarching question 48)**

| <b>No.</b> | <b>Question</b>   | <b>Total no. of reps and % objections</b> |
|------------|---|---|
| 1          | Question 13: Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy? | 88 (37.5%)                                |
| 2          | Question 14: Do you support, object or wish to comment on the approach for housing numbers and delivery?                        | 80 (47.5%)                                |
| 3          | Question 6: Do you support or object to the vision and objectives for Greater Norwich?  | 71 (25%)                                  |
| 4          | Question 46. Do you support or object or wish to comment on the approach for specific village clusters?                         | 63 (38%)                                  |
| 5          | Question 12: Do you support, object, or have any comments relating to the Climate Change Statement?                             | 62 (31%)                                  |

### **Sites Document**

#### **Norwich - sites with the most responses**

| <b>No.</b> | <b>Site Ref</b> | <b>Site Address</b>   | <b>Status</b> | <b>Total no. of reps and % objections</b> |
|------------|-----------------|---|---------------|---|
| 1          | GNLP0133-E      | Land at the UEA Grounds Depot Site, Bluebell Road   | Preferred     | 20 (80%)                                  |
| 2          | GNLP0360        | Land at the Deal Ground, Bracondale and Trowse Pumping Station in Norwich and the former May Gurney site at Trowse in South Norfolk | Preferred     | 9 (22%)                                   |
| 3          | GNLP0506        | Land at and adjoining Anglia Square, Norwich  | Preferred     | 8 (75%)                                   |
| 4          | GNLP0068        | Land adjacent to the River Wensum and the Premier Inn, Duke Street  | Preferred     | 6 (17%)                                   |
|            | GNLP0133-D      | Land between Suffolk Walk and Bluebell Road   | Preferred     | 6 (50%)                                   |
|            | GNLP3053        | Land at Carrow Works, Norwich   | Preferred     | 6 (17%)                                   |

#### **Urban Fringe - sites with the most responses**

| <b>No.</b> | <b>Site Ref</b> | <b>Site Address</b> | <b>Status</b> | <b>Total no. of reps and % objections</b> |
|------------|-----------------|---------------------|---------------|---|
|------------|-----------------|---------------------|---------------|---|

|   |          |   |                        |          |
|---|----------|---|------------------------|----------|
| 1 | GNLP1021 | Rear of Heath Crescent, Prince Andrews Road, Hellesdon (housing)    | Reasonable Alternative | 45 (93%) |
| 2 | GNLP2173 | Rear of Heath Crescent, Prince Andrews Road, Hellesdon (open space) | Reasonable Alternative | 40 (0%)  |
| 3 | GNLP0337 | Land between Fir Covert Road and Reepham Road, Taverham             | Preferred              | 16 (50%) |

### Main Towns - sites with the most responses

| No. | Site Ref                   | Site Address   | Status                 | Total no. of reps and % objections |
|-----|----------------------------|--|------------------------|------------------------------------|
| 1   | GNLP0341                   | Land between Shelfanger Road and Mount Street, Diss                            | Reasonable Alternative | 47 (91%)                           |
| 2   | GNLP0250, 0342, 0119, 0291 | Land north of cemetery, west of Shelfanger Road and east of Heywood Road, Diss | Preferred              | 24 (50%)                           |
| 3   | GNLP0311, 0595, 2060       | South of Burgh Road and west of the A140, Aylsham                              | Preferred              | 22 (50%)                           |
| 4   | GNLP0596                   | Norwich Road, Aylsham  | Reasonable Alternative | 10 (60%)                           |
| 5   | GNLP0354                   | Land at Johnsons Farm, Wymondham   | Preferred              | 10 (60%)                           |

### Key Service Centres - sites with the most responses

| No. | Site Ref     | Site Address   | Status       | Total no. of reps and % objections |
|-----|--------------|--|--------------|------------------------------------|
| 1   | GNLP0463     | Land off Langley Road, Chedgrave                       | Preferred    | 21 (67%)                           |
| 2   | GNLP0520     | Land to the south of Norwich Road, Hingham             | Preferred    | 19 (58%)                           |
| 3   | GNLP0544R    | Swan Field, Hardingham Road, Hingham                   | Unreasonable | 14 (7%)                            |
| 4   | GNLP0312     | Land to the east of Beccles Road, Loddon               | Preferred    | 12 (58%)                           |
| 5   | GNLP0391 A&B | Land at Framingham Earl, Burgate Lane, Framingham Earl | Unreasonable | 9 (11%)                            |

### Broadland Village Clusters - sites with the most responses

| No. | Site Ref | Site Address  | Status       | Total no. of reps and % objections |
|-----|----------|---|--------------|------------------------------------|
| 1   | GNLP0379 | Land north of Post Office Road, Lingwood  | Preferred    | 92 (88%)                           |
| 2   | GNLP3003 | Mill Road, Reedham  | Preferred    | 58 (86%)                           |
| 3   | GNLP2019 | Land at Rectory Road and south of the Bure Valley Railway, Coltishall                                       | Preferred    | 51 (88%)                           |
| 4   | GNLP1001 | Land to east of Station Road, Reedham   | Preferred    | 41 (88%)                           |
| 5   | GNLP2176 | North of Dereham Road, Honingham  | Preferred    | 40 (85%)                           |
| 6   | GNLP0215 | Land to the north of Long Lane, Strumpshaw (i.e. general support for site being classified as unreasonable) | Unreasonable | 39 (0%)                            |
|     | GNLP2017 | Mill Road, Strumpshaw (as above)  | Unreasonable | 39 (3%)                            |

## Potential New Settlements

| Settlement name/site     | No of Respondents | Total no. of Reps | Support | Object   | Comment |
|--------------------------|-------------------|-------------------|---------|----------|---------|
| GNLP0415 A-G - Honingham | 27                | 28                | 0       | 23 (82%) | 5       |
| GNLP1055 - Hethel        | 5                 | 5                 | 1       | 2 (40%)  | 2       |
| GNLP2168 - Silfield      | 6                 | 6                 | 1       | 4 (67%)  | 1       |

## Evidence Base

(Only studies with comments are listed – no comments were received on any other evidence base documents)

| Evidence Base document  | No of Respondents | Total No. of Reps | Support | Object  | Comment |
|---|-------------------|-------------------|---------|---------|---------|
| Habitats Regulations Assessment of Greater Norwich Regulation 18 Draft Plan (December 2019) | 2                 | 3                 | 0       | 0 (0%)  | 3       |
| Sustainability Appraisal and Strategic Environmental Assessment (January 2020)              | 5                 | 5                 | 0       | 2 (40%) | 3       |
| Interim Viability Study (November 2019)   | 3                 | 3                 | 0       | 1 (33%) | 2       |
| Greater Norwich Energy Infrastructure Study (March 2019)                                    | 2                 | 2                 | 0       | 1 (50%) | 1       |

## Appendix 2 - Consultation events

| <b>Location</b>  | <b>Date</b> | <b>Attendance</b> | <b>Main local issues raised</b>   |
|------------------|-------------|-------------------|---|
| Acle             | 06/02/20    | 115               | <ul style="list-style-type: none"> <li>• General acceptance of the limited choices of site in Acle due to flood risk and landscape considerations associated with the Broads;</li> <li>• Some support for a link road between South Walsham Road and Norwich Road;</li> <li>• Considerable opposition to site GNLP0379 in Lingwood. This has been reflected in press coverage and relates mainly to highways, landscape and process issues;</li> <li>• Concerns over the amount of growth proposed for Reedham and the 2 sites chosen; Consideration of having a Neighbourhood Plan (NP).</li> </ul>  |
| Aylsham          | 11/02/20    | 222               | <ul style="list-style-type: none"> <li>• Limited questioning of overall housing numbers for Aylsham, with some support for growth to support local services;</li> <li>• Some concern about the impact of the preferred site on Burgh Road due to the road being narrow and a bus route. Support for the inclusion of a primary school;</li> <li>• Some support for Norwich Road reasonable alternative site instead of the Burgh Road site – clarity needed on access;</li> <li>• The need for long stay car parking, possibly away from the town centre on a housing site, was highlighted. The potential for a shuttle bus to serve housing estates and a new car park was also identified;</li> <li>• Concerns were expressed by the town council over the consultation event – there was an apparent expectation of a workshop approach and concern over the quality of materials.</li> </ul> |
| Chedgrave/Loddon | 17/02/20    | 140               | <ul style="list-style-type: none"> <li>• Some objections to the need for new housing locally with the view expressed that locations other than Loddon have better access to employment and transport;</li> <li>• Access to the A146 is dangerous – the planned roundabout is needed, as are further improvements;</li> <li>• Site GNLP0312 in Chedgrave would be visually intrusive on the rural landscape;</li> <li>• Sites to the west of Chedgrave are more suitable;</li> <li>• Significant pressure is placed on the road network by traffic going to and leaving the Langley School.</li> </ul>   |
| Costessey        | 13/02/20    | 12                | Any access to the contingency site south of Lodge Farm should be from Barnard Road in Norwich.  |

|             |          |     |   |
|-------------|----------|-----|---|
| Cringleford | 04/02/20 | 38  | <ul style="list-style-type: none"> <li>• Some acceptance of Cringleford being a good place for development given the proximity to Norwich, NRP and the A11;</li> <li>• Relatively little opposition to the 'uplift' allocation in Cringleford, providing development is high standard;</li> <li>• Concern over UEA expansion and Yare Valley protection (see Norwich comments below);</li> <li>• Some interest for GNLP0253 (Colney Hall) if 'world-class' research and older people's accommodation can be brought forward;</li> <li>• The housing numbers on HET1 (Hethersett) should not be raised;</li> <li>• The gap between to Hethersett and Wymondham is becoming too narrow.</li> </ul>  |
| Diss        | 03/03/20 | 117 | <ul style="list-style-type: none"> <li>• There was significant opposition to the reasonable alternative site north of the town centre between Shelfanger Road and Mount Street, which many stated should be retained as a natural green space (without public access) due to its biodiversity and cultural value;</li> <li>• Diss Town Council was opposed to the Frontier site by the railway station, preferring to retain it in employment use. There was limited comment on this site from the general public;</li> <li>• Town Council and general support for the greenfield preferred housing options to the north of the town which would provide a short length of link road;</li> <li>• Concern over congestion on A1066;</li> <li>• Further engagement has since taken place with the town council and consideration is being given to progressing site allocations through the Neighbourhood Plan (NP) rather than the GNLP. The GNLP would remain responsible for setting overall growth numbers in the town if allocations are made through the NP.</li> </ul> |
| Harleston   | 28/02/20 | 25  | Harleston Town Council and a pressure group are opposed to the amount of growth (623 homes, including 450 homes on new sites), though the TC favours the 1 large site for 300 homes plus at Briar Farm if proposed community facilities are provided.   |
| Hingham     | 25/02/20 | 57  | Hingham TC is opposed to the preferred site for 80 homes in the east of the town, favouring a site to the west which it is believed could provide greater community benefit including community woodland and a new car park for the town centre. Possibility of a NP. Further engagement has taken place with the TC.   |
| Horsford    | 04/03/20 | 62  | <ul style="list-style-type: none"> <li>• Concern over the intensity of development on recent planning permission granted on an</li> </ul>   |

|               |          |     |  |
|---------------|----------|-----|--|
|               |          |     | <p>unallocated site (due to lack of 5-year land supply) in the north of Horsford.</p> <ul style="list-style-type: none"> <li>• Concern over the difficulty for cyclists crossing the NDR to access Hellesdon High School.</li> </ul>   |
| Norwich Forum | 26/02/20 | 65  | <ul style="list-style-type: none"> <li>• Most frequent questions related to the Anglia Square Inquiry, mainly seeking clarification on the process;</li> <li>• General support for identification of East Norwich as a strategic regeneration area, with some concern about transport issues;</li> <li>• Concern that UEA should make better use of its existing land and higher environmental protection of the Yare Valley is needed;</li> <li>• A view that GNL0433E (UEA Grounds site) could be the lead to development all along Bluebell Road;</li> </ul> <p>Support for the green infrastructure improvements recently made around the UEA Broad and towards Eaton.</p> |
|               | 05/03/20 | 38  |  |
| Sprowston     | 19/02/20 | 80  | <ul style="list-style-type: none"> <li>• Support for a potential new high school at the preferred option site at White House Farm;</li> <li>• Concern over potential loss of park and ride site;</li> <li>• Concern over surface water flood risk particularly at the current park and ride site.</li> </ul>   |
| Taverham      | 21/02/20 | 132 | <p>General support for allocation of the 1,400 home urban extension due to its provision of sites for a new school and medical facility, as well as its proposed mix of homes including bungalows and homes for the elderly in the first phase. This is subject to clarification on details of the policy requirements for open space which should reflect the NP and provide larger areas of open space around the Marriott's Way as well as green spaces on the edge of the site.</p>  |
| Wymondham     | 14/02/20 | 63  | <ul style="list-style-type: none"> <li>• Clarification requested on the location of the contingency sites and the likelihood of their inclusion in the plan;</li> <li>• Fear of Wymondham and Hethersett merging as settlements;</li> <li>• Concern over access for construction traffic on site in the south west of Wymondham;</li> <li>• Housing growth has led to a welcome increase in services and public transport provision in recent years.</li> </ul>  |

## Appendix 2:

### GNL Regulation 18 consultation

#### Overall figures for representations split by document

##### Part 1 – Strategy Document

| No of respondents | Total No. of reps | Submission Method |              |            | Support | Object | Comment |
|-------------------|-------------------|-------------------|--------------|------------|---------|--------|---------|
|                   |                   | Web               | Email        | Paper      |         |        |         |
| 242               | 1566              | 568<br>(36%)      | 983<br>(63%) | 12<br>(1%) | 356     | 427    | 783     |

##### Part 2 - Sites Document

| No of respondents | Total No. of reps | Submission Method |              |            | Support | Object | Comment |
|-------------------|-------------------|-------------------|--------------|------------|---------|--------|---------|
|                   |                   | Web               | Email        | Paper      |         |        |         |
| 753               | 1761              | 1186<br>(67%)     | 526<br>(30%) | 46<br>(3%) | 538     | 777    | 446     |

##### Evidence Base

| No of respondents | Total No. of reps | Submission Method |             |       | Support | Object | Comment |
|-------------------|-------------------|-------------------|-------------|-------|---------|--------|---------|
|                   |                   | Web               | Email       | Paper |         |        |         |
| 7                 | 12                | 1<br>(8%)         | 11<br>(92%) | 0     | 0       | 3      | 9       |

##### Overall Total for all documents

| No of respondents | Total No. of reps | Submission Method |               |            | Support | Object | Comment |
|-------------------|-------------------|-------------------|---------------|------------|---------|--------|---------|
|                   |                   | Web               | Email         | Paper      |         |        |         |
| N/A               | 3339              | 1755<br>(53%)     | 1520<br>(45%) | 58<br>(2%) | 894     | 1207   | 1238    |



## Part 1 - Strategy Document

### Split of representations by question

| Question  | No. of respondents | Total No. of reps | Support | Object | Comment |
|---|--------------------|-------------------|---------|--------|---------|
| <b>1. Introduction</b>  |                    |                   |         |        |         |
| Question 1: Please comment on or highlight any inaccuracies within the introduction   | 30                 | 33                | 1       | 14     | 18      |
| Question 2: Is the overall purpose of this draft plan clear?  | 23                 | 24                | 8       | 5      | 11      |
| <b>2. Greater Norwich Profile</b>   |                    |                   |         |        |         |
| Question 3: Please comment on or highlight any inaccuracies within the spatial profile?   | 20                 | 22                | 2       | 7      | 13      |
| Question 4: Are there any topics which have not been covered that you believe should have been?                                 | 10                 | 10                | 1       | 2      | 7       |
| Question 5: Is there anything you feel further explanation, clarification or reference?   | 21                 | 22                | 1       | 5      | 16      |
| <b>3. Vision and Objectives</b>   |                    |                   |         |        |         |
| Question 6: Do you support or object to the vision and objectives for Greater Norwich?  | 55                 | 71                | 25      | 18     | 28      |
| Question 7: Are there any factors which have not been covered that you believe should have been?                                | 15                 | 16                | 1       | 0      | 15      |
| Question 8: Is there anything that you feel needs further explanation, clarification or reference                               | 16                 | 18                | 2       | 3      | 13      |
| <b>4. Delivery and Climate Change Statements</b>  |                    |                   |         |        |         |
| Question 9: Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement? | 42                 | 52                | 19      | 21     | 12      |
| Question 10: Do you support, object, or have any comments relating to the approach to Economic                                  | 14                 | 18                | 9       | 4      | 5       |

| Question   | No. of respondents | Total No. of reps | Support | Object | Comment |
|--|--------------------|-------------------|---------|--------|---------|
| Development set out in the Delivery Statement?   |                    |                   |         |        |         |
| Question 11: Do you support, object, or have any comments relating to the approach to Infrastructure set out in the Delivery Statement?  | 24                 | 30                | 18      | 6      | 6       |
| Question 12: Do you support, object, or have any comments relating to the Climate Change Statement?  | 52                 | 62                | 20      | 19     | 23      |
| <b>5. The Strategy</b>   |                    |                   |         |        |         |
| <b>Policy 1 – The Growth Strategy</b>  |                    |                   |         |        |         |
| Question 13: Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?  | 64                 | 88                | 22      | 33     | 33      |
| Question 14: Do you support, object or wish to comment on the approach for housing numbers and delivery?   | 64                 | 80                | 16      | 38     | 26      |
| Question 15: Do you support, object or wish to comment on the approach for the Economy?  | 19                 | 26                | 4       | 7      | 15      |
| Question 16: Do you support, object or wish to comment on the approach to Review and Five-Year Land Supply?  | 24                 | 35                | 15      | 2      | 18      |
| Question 17: Do you support, object or wish to comment on the approach to Infrastructure?  | 24                 | 34                | 15      | 3      | 16      |
| <b>Policy 2 – Sustainable Communities</b>  |                    |                   |         |        |         |
| Question 18: Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement? | 50                 | 61                | 16      | 16     | 29      |

| Question  | No. of respondents | Total No. of reps | Support | Object | Comment |
|---|--------------------|-------------------|---------|--------|---------|
| Question 19: Do you support, object or have any comments relating to the specific requirements of the policy.   | 40                 | 49                | 8       | 14     | 27      |
| <b>Policy 3 – Environmental Protection and Enhancement</b>  |                    |                   |         |        |         |
| Question 20: Do you support, object or have any comments relating to approach to the built and historic environment?  | 12                 | 19                | 10      | 4      | 5       |
| Question 21: Do you support, object or have any comments relating to the approach to the natural environment?   | 33                 | 40                | 13      | 9      | 18      |
| Question 22: Are there any topics which have not been covered that you believe should have been?  | 16                 | 21                | 0       | 5      | 16      |
| <b>Policy 4 – Strategic Infrastructure</b>  |                    |                   |         |        |         |
| Question 23: Do you support, object or have any comments relating to approach to transport?   | 44                 | 53                | 12      | 18     | 23      |
| Question 24: Do you support, object or have any comments relating to the approach to other strategic infrastructure (energy, water, health care, schools and green infrastructure)? | 32                 | 35                | 2       | 4      | 29      |
| Question 25: Do you support, object or have any comments relating to the approach to on-site and local infrastructure, services and facilities?                                     | 14                 | 22                | 15      | 1      | 6       |
| Question 26: Are there any topics which have not been covered that you believe should have been?  | 11                 | 12                | 3       | 1      | 8       |
| <b>Policy 5 – Homes</b>   |                    |                   |         |        |         |
| Question 27: Do you support, object or have any comments relating to  | 44                 | 55                | 11      | 13     | 31      |

| Question  | No. of respondents | Total No. of reps | Support | Object | Comment |
|---|--------------------|-------------------|---------|--------|---------|
| approach to affordable homes?   |                    |                   |         |        |         |
| Question 28: Do you support, object or have any comments relating to the approach to space standards?   | 19                 | 28                | 5       | 4      | 19      |
| Question 29: Do you support, object or have any comments relating to the approach to accessible and specialist Housing?                                       | 14                 | 21                | 5       | 1      | 15      |
| Question 30: Do you support, object or have any comments relating to the approach to Gypsies and Travellers, Travelling Show People and Residential Caravans? | 3                  | 3                 | 3       | 0      | 0       |
| Question 31: Do you support, object or have any comments relating to the approach to Purpose-built student accommodation?                                     | 8                  | 13                | 6       | 3      | 4       |
| Question 32: Do you support, object or have any comments relating to the approach to Self/Custom-Build?   | 21                 | 26                | 1       | 11     | 14      |
| Question 33: Are there any topics which have not been covered that you believe should have been?  | 9                  | 10                | 3       | 0      | 7       |
| <b>Policy 6 – The Economy (including retail)</b>  |                    |                   |         |        |         |
| Question 34: Do you support, object or have any comments relating to the approach to employment land?   | 23                 | 31                | 4       | 9      | 18      |
| Question 35: Do you support, object or have any comments relating to the approach to tourism, leisure, environmental and cultural industries?                 | 7                  | 8                 | 2       | 1      | 5       |

| Question  | No. of respondents | Total No. of reps | Support | Object | Comment |
|---|--------------------|-------------------|---------|--------|---------|
| Question 36: Do you support, object or have any comments relating to the sequential approach to development of new retailing, leisure, offices and other main town centre uses?                               | 6                  | 8                 | 1       | 1      | 6       |
| Question 37: Are there any topics which have not been covered that you believe should have been?  | 5                  | 6                 | 1       | 0      | 5       |
| <b>Strategy for the Areas of Growth</b>   |                    |                   |         |        |         |
| <b>Policy 7.1 – Urban Area (including the fringe parishes)</b>  |                    |                   |         |        |         |
| Question 38. Do you support or object or wish to comment on the approach for the city centre? Please identify particular issues.  | 11                 | 18                | 6       | 5      | 7       |
| Question 39. Do you support or object or wish to comment on the approach for East Norwich? Please identify particular issues.   | 13                 | 17                | 4       | 4      | 9       |
| Question 40. Do you support or object or wish to comment on the approach for elsewhere in the urban area including the fringe parishes? Please identify particular issues.                                    | 32                 | 40                | 8       | 9      | 23      |
| <b>Policy 7.2 – The Main Towns</b>  |                    |                   |         |        |         |
| Question 41. Do you support or object or wish to comment on the approach for the main towns overall? Please identify particular issues.   | 18                 | 24                | 4       | 4      | 16      |
| Question 42. Do you support or object or wish to comment on the approach for specific towns (Aylsham, Diss (with part of Roydon), Harleston, Long Stratton and Wymondham)? Please identify particular issues. | 31                 | 34                | 6       | 14     | 14      |

| Question   | No. of respondents | Total No. of reps | Support | Object | Comment |
|--|--------------------|-------------------|---------|--------|---------|
| <b>Policy 7.3 – The Key Service Centres</b>  |                    |                   |         |        |         |
| Question 43. . Do you support or object or wish to comment on the approach for the key service centres overall? Please identify particular issues.   | 17                 | 20                | 3       | 7      | 10      |
| Question 44. Do you support or object or wish to comment on the approach for specific key service centres: (Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framingham Earl, Reepham, Wroxham)? Please identify particular issues. | 25                 | 28                | 7       | 8      | 13      |
| <b>Policy 7.4 – Village Clusters</b>   |                    |                   |         |        |         |
| Question 45. Do you support or object or wish to comment on the overall approach for the village clusters? Please identify particular issues.  | 44                 | 51                | 8       | 24     | 19      |
| Question 46. Do you support or object or wish to comment on the approach for specific village clusters? Please identify particular issues.   | 55                 | 63                | 5       | 24     | 34      |
| <b>Policy 7.5 – Small Scale Windfall Housing Development</b>   |                    |                   |         |        |         |
| Question 47. Do you support or object or wish to comment on the overall approach for Small Scale Windfall Housing Development? Please identify particular issues.  | 28                 | 32                | 5       | 7      | 20      |
| <b>Overarching Consultation Question</b>   |                    |                   |         |        |         |
| Question 48. Do you support or object or wish to comment any other aspect of the draft plan not covered in other questions? This includes the appendices below. Please identify particular issues.   | 64                 | 79                | 0       | 18     | 61      |

| Question                         | No. of respondents | Total No. of reps | Support | Object | Comment |
|----------------------------------|--------------------|-------------------|---------|--------|---------|
| <b>Appendices</b>                |                    |                   |         |        |         |
| 1. Infrastructure requirements   | 0                  | 0                 | 0       | 0      | 0       |
| 2. Glossary                      | 1                  | 1                 | 0       | 1      | 0       |
| 3. Monitoring Framework          | 2                  | 2                 | 0       | 0      | 2       |
| 4. Retained and superseded plans | 0                  | 0                 | 0       | 0      | 0       |
| 5. Village clusters              | 0                  | 0                 | 0       | 0      | 0       |

## Part 1 – Strategy Document

### Top 5 questions with the most responses (excluding overarching question 48)

| Number | Question  | Total Number of reps |
|--------|---|----------------------|
| 1      | Question 13: Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?               | 88                   |
| 2      | Question 14: Do you support, object or wish to comment on the approach for housing numbers and delivery?                                      | 80                   |
| 3      | Question 6: Do you support or object to the vision and objectives for Greater Norwich?  | 71                   |
| 4      | Question 46. Do you support or object or wish to comment on the approach for specific village clusters?<br>Please identify particular issues. | 63                   |
| 5      | Question 12: Do you support, object, or have any comments relating to the Climate Change Statement?   | 62                   |

## Part 2 - Sites Document

### Split of representations by settlement/site

#### Norwich and Urban Fringe

| Settlement name/site                            | No of Respondents | Total No. of Reps | Support | Object | Comment |
|---|-------------------|-------------------|---------|--------|---------|
| <b>Norwich</b>                                  |                   |                   |         |        |         |
| <b>Preferred Site Policy</b>                    |                   |                   |         |        |         |
| GNLP0068  | 6                 | 6                 | 1       | 1      | 4       |
| GNLP0133-B                                      | 5                 | 5                 | 1       | 2      | 2       |
| GNLP0133-C                                      | 2                 | 2                 | 1       | 0      | 1       |
| GNLP0133-D                                      | 6                 | 6                 | 1       | 3      | 2       |
| GNLP0133-E                                      | 20                | 20                | 1       | 16     | 3       |
| GNLP0282  | 2                 | 2                 | 1       | 0      | 1       |
| GNLP0360  | 9                 | 9                 | 1       | 2      | 6       |
| GNLP0401  | 5                 | 5                 | 1       | 1      | 3       |
| GNLP0409R                                       | 5                 | 5                 | 0       | 2      | 3       |
| GNLP0451  | 2                 | 2                 | 0       | 1      | 1       |
| GNLP0506  | 7                 | 8                 | 1       | 6      | 1       |
| GNLP2114  | 3                 | 3                 | 1       | 1      | 1       |
| GNLP2159  | 3                 | 3                 | 0       | 2      | 1       |
| GNLP2163  | 3                 | 3                 | 1       | 1      | 1       |
| GNLP2164  | 3                 | 3                 | 2       | 0      | 1       |
| GNLP3053  | 6                 | 6                 | 1       | 1      | 4       |
| GNLP3054  | 3                 | 3                 | 1       | 1      | 1       |
| <b>Carried Forward/Uplift Allocation Policy</b> |                   |                   |         |        |         |
| CC3   | 2                 | 2                 | 0       | 1      | 1       |
| CC4a  | 2                 | 2                 | 0       | 1      | 1       |
| CC4b  | 4                 | 4                 | 1       | 0      | 3       |
| CC7   | 3                 | 3                 | 1       | 0      | 2       |
| CC8   | 4                 | 4                 | 0       | 1      | 3       |
| CC10  | 2                 | 2                 | 0       | 1      | 1       |
| CC11  | 1                 | 1                 | 0       | 1      | 0       |
| CC16  | 4                 | 4                 | 1       | 1      | 2       |
| CC18  | 2                 | 2                 | 0       | 1      | 1       |
| CC24  | 2                 | 2                 | 0       | 1      | 1       |
| CC30  | 2                 | 3                 | 0       | 1      | 2       |
| R1  | 1                 | 1                 | 0       | 0      | 1       |
| R2  | 2                 | 2                 | 1       | 0      | 1       |
| R7  | 2                 | 2                 | 1       | 0      | 1       |
| R10   | 5                 | 5                 | 2       | 0      | 3       |
| R13   | 2                 | 2                 | 0       | 1      | 1       |
| R14/R15   | 3                 | 3                 | 0       | 1      | 2       |
| R17   | 3                 | 3                 | 1       | 0      | 2       |
| R18   | 1                 | 1                 | 0       | 0      | 1       |
| R19   | 1                 | 1                 | 0       | 0      | 1       |



|   |   |   |   |   |   |
|---|---|---|---|---|---|
| R20   | 2 | 2 | 1 | 0 | 1 |
| R29   | 0 | 0 | 0 | 0 | 0 |
| R30   | 1 | 1 | 0 | 0 | 1 |
| R31   | 3 | 3 | 2 | 1 | 0 |
| R33   | 2 | 2 | 1 | 0 | 1 |
| R35   | 2 | 2 | 0 | 1 | 1 |
| R36   | 2 | 2 | 1 | 0 | 1 |
| R37   | 2 | 2 | 0 | 1 | 1 |
| R38   | 2 | 2 | 1 | 0 | 1 |
| R42   | 3 | 3 | 2 | 0 | 1 |
| <b>Reasonable Alternative Sites</b>             |   |   |   |   |   |
| GNLP0377  | 1 | 1 | 0 | 0 | 1 |
| GNLP0381  | 0 | 0 | 0 | 0 | 0 |
| GNLP0570  | 0 | 0 | 0 | 0 | 0 |
| GNLP2137  | 2 | 2 | 0 | 0 | 2 |
| GNLP3050  | 0 | 0 | 0 | 0 | 0 |
| <b>Unreasonable Sites</b>                       |   |   |   |   |   |
| GNLP0117  | 0 | 0 | 0 | 0 | 0 |
| GNLP0133A                                       | 0 | 0 | 0 | 0 | 0 |
| GNLP0133F                                       | 1 | 1 | 1 | 0 | 0 |
| GNLP0184  | 0 | 0 | 0 | 0 | 0 |
| GNLP0248 A&B                                    | 0 | 0 | 0 | 0 | 0 |
| GNLP0453  | 0 | 0 | 0 | 0 | 0 |
| GNLP0500  | 0 | 0 | 0 | 0 | 0 |
| GNLP0523  | 1 | 1 | 0 | 0 | 1 |
| GNLP1011  | 0 | 0 | 0 | 0 | 0 |
| GNLP1061  | 2 | 2 | 1 | 1 | 0 |
| GNLP2077  | 0 | 0 | 0 | 0 | 0 |
| GNLP2120  | 0 | 0 | 0 | 0 | 0 |
| GNLP2123  | 0 | 0 | 0 | 0 | 0 |
| <b>Colney Strategic Employment</b>              |   |   |   |   |   |
| <b>Preferred Site Policy</b>                    |   |   |   |   |   |
| GNLP0331R-B                                     | 0 | 0 | 0 | 0 | 0 |
| GNLP0331R-C                                     | 0 | 0 | 0 | 0 | 0 |
| <b>Carried Forward/Uplift Allocation Policy</b> |   |   |   |   |   |
| COL 1   | 2 | 2 | 0 | 1 | 1 |
| COL 2 /GNLP0140-C                               | 3 | 3 | 1 | 1 | 1 |
| COL 3   | 0 | 0 | 0 | 0 | 0 |
| BAW2  | 5 | 6 | 2 | 1 | 3 |
| <b>Reasonable Alternative Sites</b>             |   |   |   |   |   |
| No sites  |   |   |   |   |   |
| <b>Unreasonable Sites - Residential</b>         |   |   |   |   |   |
| GNLP0592  | 1 | 1 | 1 | 0 | 0 |
| GNLP0514  | 2 | 2 | 0 | 1 | 1 |
| GNLP0253  | 1 | 1 | 0 | 1 | 0 |
| GNLP0158  | 0 | 0 | 0 | 0 | 0 |
| <b>Unreasonable Sites - Non-residential</b>     |   |   |   |   |   |
| GNLP0140-A                                      | 0 | 0 | 0 | 0 | 0 |

|   |   |    |   |   |   |
|---|---|----|---|---|---|
| GNLP0140-B  | 0 | 0  | 0 | 0 | 0 |
| GNLP0331R-A   | 0 | 0  | 0 | 0 | 0 |
| GNLP0244  | 0 | 0  | 0 | 0 | 0 |
| <b>Costessey</b>  |   |    |   |   |   |
| <b>Preferred Site Policy</b>                              |   |    |   |   |   |
| No Sites  |   |    |   |   |   |
| <b>Carried Forward/Uplift Allocation Policy</b>           |   |    |   |   |   |
| COS 3/ GNLP SL2008  | 1 | 1  | 0 | 0 | 1 |
| COS 4   | 0 | 0  | 0 | 0 | 0 |
| COS 5/GNLP2074  | 1 | 1  | 1 | 0 | 0 |
| <b>Reasonable Alternative Sites</b>                       |   |    |   |   |   |
| GNLP0593  | 0 | 0  | 0 | 0 | 0 |
| GNLP0581  | 4 | 4  | 1 | 1 | 2 |
| GNLP2043  | 3 | 3  | 0 | 2 | 1 |
| <b>Unreasonable Sites - Residential</b>                   |   |    |   |   |   |
| GNLP0039  | 0 | 0  | 0 | 0 | 0 |
| GNLP0206  | 0 | 0  | 0 | 0 | 0 |
| GNLP0238  | 0 | 0  | 0 | 0 | 0 |
| GNLP0243  | 0 | 0  | 0 | 0 | 0 |
| GNLP0266  | 0 | 0  | 0 | 0 | 0 |
| GNLP0284R   | 1 | 1  | 0 | 1 | 0 |
| GNLP0468  | 0 | 0  | 0 | 0 | 0 |
| GNLP0489  | 0 | 0  | 0 | 0 | 0 |
| GNLP2004  | 0 | 0  | 0 | 0 | 0 |
| GNLP2138  | 1 | 1  | 0 | 1 | 0 |
| GNLP2156  | 0 | 0  | 0 | 0 | 0 |
| <b>Unreasonable Sites - Non-residential</b>               |   |    |   |   |   |
| GNLP0376  | 0 | 0  | 0 | 0 | 0 |
| <b>Cringleford (including employment land at Keswick)</b> |   |    |   |   |   |
| <b>Preferred Site Policy</b>                              |   |    |   |   |   |
| No Sites  |   |    |   |   |   |
| <b>Carried Forward/Uplift Allocation Policy</b>           |   |    |   |   |   |
| HOU1/GNLP0307/GNLP0327                                    | 6 | 10 | 3 | 0 | 7 |
| KES 2/GNLP0497  | 5 | 5  | 1 | 2 | 2 |
| <b>Reasonable Alternative Sites</b>                       |   |    |   |   |   |
| No Sites  |   |    |   |   |   |
| <b>Unreasonable Sites - Residential</b>                   |   |    |   |   |   |
| GNLP0461  | 1 | 1  | 1 | 0 | 0 |
| <b>Unreasonable Sites - Non-residential</b>               |   |    |   |   |   |
| GNLP3047  | 1 | 1  | 0 | 1 | 0 |
| <b>Drayton</b>  |   |    |   |   |   |
| <b>Preferred Site Policy</b>                              |   |    |   |   |   |
| No Sites  |   |    |   |   |   |
| <b>Carried Forward/Uplift Allocation Policy</b>           |   |    |   |   |   |
| DRA1  | 3 | 3  | 0 | 1 | 2 |
| <b>Reasonable Alternative Sites</b>                       |   |    |   |   |   |
| No Sites  | 1 | 1  | 1 | 0 | 0 |
| <b>Unreasonable Sites</b>                                 |   |    |   |   |   |

|   |                          |    |    |    |   |
|---|--------------------------|----|----|----|---|
| No sites  | 0                        | 0  | 0  | 0  | 0 |
| <b>Easton and Honingham</b>                     |                          |    |    |    |   |
| <b>Preferred Site Policy</b>                    |                          |    |    |    |   |
| GNLP2176  | 39                       | 40 | 4  | 34 | 2 |
| <b>Carried Forward/Uplift Allocation Policy</b> |                          |    |    |    |   |
| EAS 1   | 11                       | 11 | 1  | 8  | 2 |
| <b>Reasonable Alternative Sites</b>             |                          |    |    |    |   |
| GNLP0415 A-G                                    | See new settlement table |    |    |    |   |
| <b>Unreasonable Sites</b>                       |                          |    |    |    |   |
| GNLP0456  | 3                        | 3  | 2  | 0  | 1 |
| GNLP0411  | 4                        | 4  | 3  | 1  | 0 |
| <b>Hellesdon</b>                                |                          |    |    |    |   |
| <b>Preferred Site Policy</b>                    |                          |    |    |    |   |
| No Sites  |                          |    |    |    |   |
| <b>Carried Forward/Uplift Allocation Policy</b> |                          |    |    |    |   |
| HEL1  | 1                        | 1  | 1  | 0  | 0 |
| HEL2  | 3                        | 3  | 1  | 0  | 2 |
| HEL3/ GNLP1020                                  | 0                        | 0  | 0  | 0  | 0 |
| HEL4/ GNLP1019                                  | 2                        | 2  | 0  | 0  | 2 |
| <b>Reasonable Alternative Sites</b>             |                          |    |    |    |   |
| GNLP1021  | 38                       | 40 | 37 | 0  | 3 |
| GNLP2173  | 43                       | 45 | 1  | 42 | 2 |
| <b>Unreasonable Sites</b>                       |                          |    |    |    |   |
| GNLP2142  | 1                        | 1  | 0  | 1  | 0 |
| <b>Old Catton</b>                               |                          |    |    |    |   |
| <b>Preferred Site Policy</b>                    |                          |    |    |    |   |
| No Sites  |                          |    |    |    |   |
| <b>Carried Forward/Uplift Allocation Policy</b> |                          |    |    |    |   |
| No Sites  |                          |    |    |    |   |
| <b>Reasonable Alternative Sites</b>             |                          |    |    |    |   |
| No Sites  |                          |    |    |    |   |
| <b>Unreasonable Sites</b>                       |                          |    |    |    |   |
| No Sites  |                          |    |    |    |   |
| <b>Rackheath</b>                                |                          |    |    |    |   |
| <b>Preferred Site Policy</b>                    |                          |    |    |    |   |
| GNLP0172  | 3                        | 3  | 1  | 1  | 1 |
| GNLP0351  | 1                        | 1  | 0  | 0  | 1 |
| <b>Carried Forward/Uplift Allocation Policy</b> |                          |    |    |    |   |
| No Sites  |                          |    |    |    |   |
| <b>Reasonable Alternative Sites</b>             |                          |    |    |    |   |
| No Sites  |                          |    |    |    |   |
| <b>Unreasonable Sites</b>                       |                          |    |    |    |   |
| GNLP0095  | 2                        | 2  | 0  | 1  | 1 |
| GNLP0478  | 0                        | 0  | 0  | 0  | 0 |
| GNLP1029  | 1                        | 1  | 0  | 0  | 1 |
| GNLP1030  | 0                        | 0  | 0  | 0  | 0 |
| GNLP1060  | 1                        | 1  | 0  | 0  | 1 |
| GNLP2037  | 2                        | 2  | 1  | 0  | 1 |

|   |    |    |   |   |   |
|---|----|----|---|---|---|
| GNLP2092  | 1  | 2  | 0 | 0 | 2 |
| GNLP2166  | 2  | 2  | 0 | 1 | 1 |
| <b>Sprowston</b>  |    |    |   |   |   |
| <b>Preferred Site Policy</b>  |    |    |   |   |   |
| GNLP0132  | 9  | 9  | 4 | 1 | 4 |
| <b>Carried Forward/Uplift Allocation Policy</b>                     |    |    |   |   |   |
| No Sprowston Carried Forward sites                                  | 1  | 1  | 0 | 0 | 1 |
| <b>Reasonable Alternative Sites</b>                                 |    |    |   |   |   |
| GNLP0383  | 1  | 1  | 0 | 1 | 0 |
| GNLP3024  | 3  | 3  | 2 | 0 | 1 |
| <b>Unreasonable Sites</b>   |    |    |   |   |   |
| GNLP0042  | 2  | 2  | 1 | 1 | 0 |
| GNLP2178  | 1  | 1  | 0 | 1 | 0 |
| <b>Taverham</b>   |    |    |   |   |   |
| <b>Preferred Site Policy</b>  |    |    |   |   |   |
| GNLP0337  | 16 | 16 | 1 | 8 | 7 |
| <b>Carried Forward/Uplift Allocation Policy</b>                     |    |    |   |   |   |
| No Sites  | 1  | 1  | 0 | 1 | 0 |
| <b>Reasonable Alternative Sites</b>                                 |    |    |   |   |   |
| GNLP0159  | 1  | 1  | 1 | 0 | 0 |
| <b>Unreasonable Sites</b>   |    |    |   |   |   |
| GNLP0062  | 3  | 3  | 0 | 0 | 3 |
| GNLP0457  | 0  | 0  | 0 | 0 | 0 |
| GNLP2051  | 5  | 5  | 0 | 1 | 4 |
| GNLP2106  | 1  | 1  | 1 | 0 | 0 |
| GNLP3039  | 0  | 0  | 0 | 0 | 0 |
| GNLP3040  | 0  | 0  | 0 | 0 | 0 |
| GNLP3041  | 0  | 0  | 0 | 0 | 0 |
| GNLP3043  | 0  | 0  | 0 | 0 | 0 |
| GNLP3045  | 0  | 0  | 0 | 0 | 0 |
| <b>Thorpe St Andrew</b>   |    |    |   |   |   |
| <b>Preferred Site Policy</b>  |    |    |   |   |   |
| No Sites  |    |    |   |   |   |
| <b>Carried Forward/Uplift Allocation Policy</b>                     |    |    |   |   |   |
| No Sites  |    |    |   |   |   |
| <b>Reasonable Alternative Sites</b>                                 |    |    |   |   |   |
| No Sites  |    |    |   |   |   |
| <b>Unreasonable Sites</b>   |    |    |   |   |   |
| GNLP0228  | 0  | 0  | 0 | 0 | 0 |
| GNLP0442  | 3  | 3  | 3 | 0 | 0 |
| GNLP0540  | 0  | 0  | 0 | 0 | 0 |
| GNLP2170  | 1  | 1  | 0 | 1 | 0 |
| GNLP2171  | 1  | 1  | 0 | 1 | 0 |
| <b>Trowse (including non-residential at Bixley and Whitlingham)</b> |    |    |   |   |   |
| <b>Preferred Site Policy</b>  |    |    |   |   |   |
| No Sites  |    |    |   |   |   |
| <b>Carried Forward/Uplift Allocation Policy</b>                     |    |    |   |   |   |

|                                     |   |   |   |   |   |
|-------------------------------------|---|---|---|---|---|
| TROW1                               | 3 | 3 | 0 | 1 | 2 |
| <b>Reasonable Alternative Sites</b> |   |   |   |   |   |
| GNLP3051                            | 2 | 2 | 0 | 1 | 1 |
| GNLP3052                            | 2 | 2 | 0 | 0 | 2 |
| <b>Unreasonable Sites</b>           |   |   |   |   |   |
| No Sites                            |   |   |   |   |   |

### New Settlements

| Settlement name/site     | No of Respondents | Total No. of Reps | Support | Object | Comment |
|--------------------------|-------------------|-------------------|---------|--------|---------|
| GNLP0415 A-G - Honingham | 27                | 28                | 0       | 23     | 5       |
| GNLP1055 - Hethel        | 5                 | 5                 | 1       | 2      | 2       |
| GNLP2168 - Silfield      | 6                 | 6                 | 1       | 4      | 1       |

### Main Towns

| Settlement name/site  | No of Respondents | Total No. of Reps | Support | Object | Comment |
|---|-------------------|-------------------|---------|--------|---------|
| <b>Aylsham (including Blickling, Burgh &amp; Tuttington and Oulton)</b> |                   |                   |         |        |         |
| <b>Preferred Site Policy</b>  |                   |                   |         |        |         |
| GNLP0311/0595/2060  | 20                | 22                | 3       | 11     | 8       |
| <b>Carried Forward/Uplift Allocation Policy</b>                         |                   |                   |         |        |         |
| AYL3  | 3                 | 3                 | 1       | 1      | 1       |
| AYL4  | 3                 | 3                 | 2       | 0      | 1       |
| <b>Reasonable Alternative Sites</b>                                     |                   |                   |         |        |         |
| GNLP0336  | 5                 | 6                 | 2       | 0      | 4       |
| GNLP0596  | 10                | 10                | 1       | 6      | 3       |
| <b>Unreasonable Sites</b>   |                   |                   |         |        |         |
| GNLP0287  | 4                 | 4                 | 3       | 1      | 0       |
| GNLP2059  | 2                 | 2                 | 2       | 0      | 0       |
| <b>Diss (including part of Roydon)</b>                                  |                   |                   |         |        |         |
| <b>Preferred Site Policy</b>  |                   |                   |         |        |         |
| GNLP0102  | 5                 | 5                 | 0       | 1      | 4       |
| GNLP0250/0342/0119/0291   | 15                | 24                | 7       | 12     | 5       |
| <b>Carried Forward/Uplift Allocation Policy</b>                         |                   |                   |         |        |         |
| DIS1  | 4                 | 4                 | 2       | 0      | 2       |
| DIS2  | 5                 | 5                 | 1       | 1      | 3       |
| DIS3  | 5                 | 5                 | 1       | 2      | 2       |
| DIS8  | 2                 | 2                 | 1       | 0      | 1       |
| DIS9  | 3                 | 3                 | 0       | 0      | 3       |
| <b>Reasonable Alternative Sites</b>                                     |                   |                   |         |        |         |
| GNLP0341  | 43                | 47                | 0       | 43     | 4       |
| GNLP1045  | 6                 | 6                 | 2       | 2      | 2       |
| <b>Unreasonable Sites - Residential</b>                                 |                   |                   |         |        |         |
| GNLP0185  | 1                 | 1                 | 1       | 0      | 0       |
| GNLP0362  | 4                 | 5                 | 2       | 3      | 0       |

|   |   |   |   |   |   |
|---|---|---|---|---|---|
| GNLP0599  | 4 | 4 | 1 | 1 | 2 |
| GNLP0606  | 4 | 5 | 2 | 3 | 0 |
| GNLP1003  | 4 | 4 | 1 | 1 | 2 |
| GNLP1038  | 3 | 4 | 4 | 0 | 0 |
| GNLP1044  | 5 | 5 | 1 | 2 | 2 |
| GNLP2104  | 5 | 6 | 2 | 4 | 0 |
| <b>Unreasonable Sites - Non-residential</b>                         |   |   |   |   |   |
| GNLP2067  | 1 | 1 | 1 | 0 | 0 |
| <b>Redenhall with Harleston</b>                                     |   |   |   |   |   |
| <b>Preferred Site Policy</b>  |   |   |   |   |   |
| GNLP2108  | 6 | 6 | 1 | 4 | 1 |
| GNLP2136  | 7 | 7 | 2 | 4 | 1 |
| <b>Carried Forward/Uplift Allocation Policy</b>                     |   |   |   |   |   |
| HAR 4   | 4 | 4 | 0 | 1 | 3 |
| HAR 5   | 3 | 3 | 0 | 2 | 1 |
| HAR 6   | 2 | 2 | 0 | 0 | 2 |
| HAR 7   | 3 | 3 | 0 | 1 | 2 |
| <b>Reasonable Alternative Sites</b>                                 |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Unreasonable Sites</b>   |   |   |   |   |   |
| GNLP0209  | 0 | 0 | 0 | 0 | 0 |
| GNLP2088  | 0 | 0 | 0 | 0 | 0 |
| GNLP2098  | 0 | 0 | 0 | 0 | 0 |
| GNLP2099  | 1 | 1 | 0 | 1 | 0 |
| GNLP2105  | 0 | 0 | 0 | 0 | 0 |
| GNLP2115  | 1 | 1 | 0 | 1 | 0 |
| GNLP2116  | 0 | 0 | 0 | 0 | 0 |
| GNLP3048  | 0 | 0 | 0 | 0 | 0 |
| <b>Hethel Strategic Employment</b>                                  |   |   |   |   |   |
| <b>Preferred Site Policy</b>  |   |   |   |   |   |
| GNLP2109  | 2 | 2 | 0 | 0 | 2 |
| <b>Carried Forward/Uplift Allocation Policy</b>                     |   |   |   |   |   |
| HETHEL 1  | 1 | 1 | 0 | 0 | 1 |
| HETHEL 2  | 3 | 3 | 0 | 1 | 2 |
| <b>Reasonable Alternative Sites</b>                                 |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Unreasonable Sites</b>   |   |   |   |   |   |
| GNLP2097  | 0 | 0 | 0 | 0 | 0 |
| <b>Long Stratton (including part of Tharston and Hapton parish)</b> |   |   |   |   |   |
| <b>Preferred Site Policy</b>  |   |   |   |   |   |
| No Sites  | 1 | 1 | 0 | 1 | 0 |
| <b>Carried Forward/Uplift Allocation Policy</b>                     |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Reasonable Alternative Sites</b>                                 |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Unreasonable Sites - Residential</b>                             |   |   |   |   |   |
| GNLP0142  | 0 | 0 | 0 | 0 | 0 |
| GNLP0201  | 0 | 0 | 0 | 0 | 0 |

|   |                          |    |   |   |   |
|---|--------------------------|----|---|---|---|
| GNLP0458  | 0                        | 0  | 0 | 0 | 0 |
| GNLP0509  | 0                        | 0  | 0 | 0 | 0 |
| GNLP0576  | 0                        | 0  | 0 | 0 | 0 |
| GNLP1050  | 0                        | 0  | 0 | 0 | 0 |
| GNLP3033  | 0                        | 0  | 0 | 0 | 0 |
| <b>Unreasonable Sites - Non-residential</b>     |                          |    |   |   |   |
| GNLP0272  | 0                        | 0  | 0 | 0 | 0 |
| <b>Wymondham</b>                                |                          |    |   |   |   |
| <b>Preferred Site Policy</b>                    |                          |    |   |   |   |
| GNLP0354  | 10                       | 10 | 2 | 6 | 2 |
| GNLP3013  | 5                        | 5  | 1 | 2 | 2 |
| <b>Carried Forward/Uplift Allocation Policy</b> |                          |    |   |   |   |
| <b>No Sites</b>                                 |                          |    |   |   |   |
| <b>Reasonable Alternative Sites</b>             |                          |    |   |   |   |
| GNLP0006  | 4                        | 4  | 0 | 3 | 1 |
| GNLP0515  | 6                        | 6  | 1 | 4 | 1 |
| GNLP0525R                                       | 7                        | 8  | 0 | 4 | 4 |
| GNLP1055  | See new settlement table |    |   |   |   |
| GNLP2150  | 3                        | 3  | 0 | 3 | 0 |
| GNLP2155  | 2                        | 2  | 0 | 2 | 0 |
| GNLP2168  | See new settlement table |    |   |   |   |
| <b>Unreasonable Sites - Residential</b>         |                          |    |   |   |   |
| GNLP0032  | 1                        | 1  | 0 | 1 | 0 |
| GNLP0200  | 0                        | 0  | 0 | 0 | 0 |
| GNLP0320  | 3                        | 3  | 2 | 1 | 0 |
| GNLP0355  | 1                        | 1  | 0 | 1 | 0 |
| GNLP0402  | 2                        | 2  | 1 | 1 | 0 |
| GNLP0403  | 2                        | 2  | 1 | 1 | 0 |
| GNLP0507  | 0                        | 0  | 0 | 0 | 0 |
| GNLP2073  | 0                        | 0  | 0 | 0 | 0 |
| GNLP2090  | 0                        | 0  | 0 | 0 | 0 |
| GNLP2169  | 0                        | 0  | 0 | 0 | 0 |
| <b>Unreasonable Sites - Non-residential</b>     |                          |    |   |   |   |
| GNLP0116  | 1                        | 1  | 0 | 1 | 0 |
| GNLP0285  | 0                        | 0  | 0 | 0 | 0 |

### Key Service Centres

| Settlement name/site                            | No of Respondents | Total No. of Reps | Support | Object | Comment |
|---|-------------------|-------------------|---------|--------|---------|
| <b>Acle</b>                                     |                   |                   |         |        |         |
| <b>Preferred Site Policy</b>                    |                   |                   |         |        |         |
| GNLP0378  | 7                 | 8                 | 1       | 3      | 4       |
| GNLP2139  | 6                 | 7                 | 1       | 3      | 3       |
| <b>Carried Forward/Uplift Allocation Policy</b> |                   |                   |         |        |         |
| ACL1  | 3                 | 3                 | 0       | 1      | 2       |

|   |   |   |   |   |   |
|---|---|---|---|---|---|
| ACL2  | 2 | 2 | 0 | 1 | 1 |
| ACL3  | 0 | 0 | 0 | 0 | 0 |
| <b>Reasonable Alternative Sites</b>             |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Unreasonable Sites</b>                       |   |   |   |   |   |
| GNLP0007  | 2 | 2 | 1 | 1 | 0 |
| GNLP0384  | 2 | 2 | 1 | 1 | 0 |
| GNLP0417  | 1 | 1 | 1 | 0 | 0 |
| GNLP0421R                                       | 2 | 2 | 1 | 1 | 0 |
| GNLP0427  | 1 | 1 | 1 | 0 | 0 |
| GNLP1022  | 1 | 1 | 1 | 0 | 0 |
| GNLP1049  | 1 | 1 | 1 | 0 | 0 |
| <b>Blofield</b>                                 |   |   |   |   |   |
| <b>Preferred Site Policy</b>                    |   |   |   |   |   |
| GNLP2161  | 2 | 2 | 0 | 1 | 1 |
| <b>Carried Forward/Uplift Allocation Policy</b> |   |   |   |   |   |
| BLO1  | 4 | 4 | 0 | 1 | 3 |
| <b>Reasonable Alternative Sites</b>             |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Unreasonable Sites</b>                       |   |   |   |   |   |
| GNLP0082  | 2 | 2 | 1 | 0 | 1 |
| GNLP0252  | 2 | 2 | 1 | 1 | 0 |
| GNLP2024  | 1 | 1 | 1 | 0 | 0 |
| GNLP2085  | 1 | 1 | 1 | 0 | 0 |
| GNLP2149  | 2 | 2 | 1 | 1 | 0 |
| <b>Brundall including Postwick with Witton</b>  |   |   |   |   |   |
| <b>Preferred Site Policy</b>                    |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Carried Forward/Uplift Allocation Policy</b> |   |   |   |   |   |
| BRU2  | 2 | 2 | 0 | 0 | 2 |
| BRU3  | 3 | 3 | 2 | 0 | 1 |
| <b>Reasonable Alternative Sites</b>             |   |   |   |   |   |
| No Sites  | 0 | 0 | 0 | 0 | 0 |
| <b>Unreasonable Sites - Residential</b>         |   |   |   |   |   |
| GNLP0254  | 1 | 1 | 1 | 0 | 0 |
| GNLP0295  | 1 | 1 | 1 | 0 | 0 |
| GNLP0325  | 0 | 0 | 0 | 0 | 0 |
| GNLP0352  | 3 | 3 | 3 | 0 | 0 |
| GNLP0369  | 0 | 0 | 0 | 0 | 0 |
| GNLP0370  | 0 | 0 | 0 | 0 | 0 |
| GNLP0375  | 1 | 1 | 1 | 0 | 0 |
| GNLP0436  | 7 | 7 | 6 | 1 | 0 |
| GNLP0571  | 2 | 2 | 1 | 1 | 0 |
| GNLP3009  | 0 | 0 | 0 | 0 | 0 |
| <b>Unreasonable Sites - Non-residential</b>     |   |   |   |   |   |
| GNLP0371  | 0 | 0 | 0 | 0 | 0 |
| GNLP2069  | 3 | 3 | 2 | 0 | 1 |
| GNLP3029  | 0 | 0 | 0 | 0 | 0 |



|   |    |    |    |    |   |
|---|----|----|----|----|---|
| GNLP3049  | 0  | 0  | 0  | 0  | 0 |
| <b>Hethersett</b>                               |    |    |    |    |   |
| <b>Preferred Site Policy</b>                    |    |    |    |    |   |
| No Sites  | 1  | 1  | 0  | 1  | 0 |
| <b>Carried Forward/Uplift Allocation Policy</b> |    |    |    |    |   |
| HET 1 (part GNLP0177-A)                         | 5  | 6  | 1  | 1  | 4 |
| HET 2   | 1  | 1  | 0  | 0  | 1 |
| HET 3   | 2  | 2  | 0  | 0  | 2 |
| <b>Reasonable Alternative Sites</b>             |    |    |    |    |   |
| GNLP0480  | 2  | 2  | 0  | 0  | 2 |
| <b>Unreasonable Sites - Residential</b>         |    |    |    |    |   |
| GNLP0135  | 2  | 2  | 1  | 1  | 0 |
| GNLP0177BR                                      | 3  | 3  | 1  | 2  | 0 |
| GNLP0394  | 2  | 2  | 1  | 1  | 0 |
| GNLP0462  | 1  | 1  | 1  | 0  | 0 |
| GNLP0481  | 1  | 1  | 1  | 0  | 0 |
| GNLP3030  | 1  | 1  | 1  | 0  | 0 |
| <b>Unreasonable Sites – Non Residential</b>     |    |    |    |    |   |
| GNLP0177BR/GNLP0358R                            | 1  | 1  | 1  | 0  | 0 |
| GNLP0486  | 1  | 1  | 1  | 0  | 0 |
| GNLP1023A                                       | 2  | 2  | 1  | 1  | 0 |
| GNLP1023B                                       | 2  | 2  | 1  | 0  | 1 |
| <b>Hingham</b>                                  |    |    |    |    |   |
| <b>Preferred Site Policy</b>                    |    |    |    |    |   |
| GNLP0503  | 4  | 5  | 0  | 3  | 2 |
| GNLP0520  | 16 | 19 | 1  | 11 | 7 |
| <b>Carried Forward/Uplift Allocation Policy</b> |    |    |    |    |   |
| HIN2  | 3  | 4  | 0  | 1  | 3 |
| <b>Reasonable Alternative Sites</b>             |    |    |    |    |   |
| No Sites  | 1  | 1  | 0  | 1  | 0 |
| <b>Unreasonable Sites</b>                       |    |    |    |    |   |
| GNLP0273  | 1  | 2  | 2  | 0  | 0 |
| GNLP0298  | 5  | 8  | 0  | 6  | 2 |
| GNLP0310  | 3  | 4  | 2  | 0  | 2 |
| GNLP0335  | 3  | 5  | 0  | 5  | 0 |
| GNLP0395  | 2  | 3  | 1  | 1  | 1 |
| GNLP0501  | 1  | 2  | 0  | 2  | 0 |
| GNLP0502  | 1  | 2  | 0  | 2  | 0 |
| GNLP0544R                                       | 11 | 14 | 10 | 1  | 3 |
| <b>Loddon and Chedgrave</b>                     |    |    |    |    |   |
| <b>Preferred Site Policy</b>                    |    |    |    |    |   |
| GNLP0312  | 12 | 12 | 1  | 7  | 4 |
| GNLP0463  | 19 | 21 | 1  | 14 | 6 |
| <b>Carried Forward/Uplift Allocation Policy</b> |    |    |    |    |   |
| LOD 3   | 1  | 1  | 0  | 0  | 1 |
| <b>Reasonable Alternative Sites</b>             |    |    |    |    |   |
| No Sites  |    |    |    |    |   |

| <b>Unreasonable Sites - Residential</b>   |    |    |   |   |   |
|---|----|----|---|---|---|
| GNLP0008  | 1  | 1  | 0 | 0 | 1 |
| GNLP0313  | 2  | 2  | 0 | 0 | 2 |
| GNLP0314  | 1  | 1  | 0 | 0 | 1 |
| GNLP0372  | 2  | 2  | 0 | 1 | 1 |
| GNLP1014  | 6  | 6  | 0 | 1 | 5 |
| GNLP2055  | 3  | 3  | 0 | 0 | 3 |
| GNLP2032  | 3  | 3  | 0 | 0 | 3 |
| <b>Unreasonable Sites - Non-residential</b>   |    |    |   |   |   |
| GNLP0347  | 0  | 0  | 0 | 0 | 0 |
| <b>Poringland, Framingham Earl and Framingham Pigot, including well related parts of Bixley, Caistor St Edmund and Stoke Holy Cross</b> |    |    |   |   |   |
| <b>Preferred Site Policy</b>  |    |    |   |   |   |
| No Sites  | 4  | 4  | 3 | 0 | 1 |
| <b>Carried Forward/Uplift Allocation Policy</b>   |    |    |   |   |   |
| POR3  | 1  | 1  | 0 | 0 | 1 |
| <b>Reasonable Alternative Sites</b>   |    |    |   |   |   |
| No Sites  | 2  | 2  | 2 | 0 | 0 |
| <b>Unreasonable Sites - Residential</b>   |    |    |   |   |   |
| GNLP0003  | 2  | 2  | 2 | 0 | 0 |
| GNLP0131  | 4  | 4  | 3 | 0 | 1 |
| GNLP0169  | 2  | 2  | 1 | 1 | 0 |
| GNLP0223  | 8  | 8  | 7 | 0 | 1 |
| GNLP0280  | 3  | 3  | 2 | 1 | 0 |
| GNLP0316  | 3  | 3  | 1 | 1 | 1 |
| GNLP0321  | 3  | 3  | 2 | 1 | 0 |
| GNLP0391 A & B  | 9  | 9  | 7 | 1 | 1 |
| GNLP0485  | 7  | 7  | 5 | 1 | 1 |
| GNLP0491  | 3  | 3  | 3 | 0 | 0 |
| GNLP0494  | 2  | 3  | 1 | 1 | 1 |
| GNLP0589 A & B  | 2  | 3  | 1 | 2 | 0 |
| GNLP1032  | 3  | 3  | 2 | 1 | 0 |
| GNLP1047  | 1  | 1  | 1 | 0 | 0 |
| GNLP2093  | 4  | 4  | 4 | 0 | 0 |
| GNLP2094  | 3  | 3  | 2 | 0 | 1 |
| GNLP2111  | 2  | 2  | 2 | 0 | 0 |
| GNLP2124R   | 2  | 2  | 2 | 0 | 0 |
| GNLP2127  | 2  | 2  | 2 | 0 | 0 |
| GNLP2153  | 10 | 10 | 8 | 1 | 1 |
| <b>Unreasonable Sites - Non-residential</b>   |    |    |   |   |   |
| GNLP0323  | 1  | 1  | 0 | 1 | 0 |
| <b>Reepham (including Booton, Guestwick, Heydon, Salle and Wood Dalling)</b>  |    |    |   |   |   |
| <b>Preferred Site Policy</b>  |    |    |   |   |   |
| No Sites  |    |    |   |   |   |
| <b>Carried Forward/Uplift Allocation Policy</b>   |    |    |   |   |   |
| REP1  | 4  | 4  | 0 | 1 | 3 |
| REP2  | 2  | 2  | 0 | 0 | 2 |
| <b>Reasonable Alternative Sites</b>   |    |    |   |   |   |

|   |   |   |   |   |   |
|---|---|---|---|---|---|
| No Sites  |   |   |   |   |   |
| <b>Unreasonable Sites - Residential</b>         |   |   |   |   |   |
| GNLP0096  | 1 | 1 | 1 | 0 | 0 |
| GNLP0180  | 1 | 1 | 1 | 0 | 0 |
| GNLP0183  | 1 | 1 | 1 | 0 | 0 |
| GNLP0221  | 1 | 1 | 1 | 0 | 0 |
| GNLP0353  | 2 | 2 | 1 | 0 | 1 |
| GNLP0543 A & B                                  | 1 | 1 | 1 | 0 | 0 |
| GNLP2026  | 1 | 1 | 1 | 0 | 0 |
| GNLP2075  | 1 | 1 | 1 | 0 | 0 |
| <b>Unreasonable Sites - Non-residential</b>     |   |   |   |   |   |
| GNLP1007  | 1 | 1 | 1 | 0 | 0 |
| <b>Wroxham</b>                                  |   |   |   |   |   |
| <b>Preferred Site Policy</b>                    |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Carried Forward/Uplift Allocation Policy</b> |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Reasonable Alternative Sites</b>             |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Unreasonable Sites</b>                       |   |   |   |   |   |
| GNLP0041  | 2 | 2 | 0 | 1 | 1 |
| GNLP2131  | 2 | 3 | 0 | 2 | 1 |
| GNLP2135  | 2 | 2 | 0 | 1 | 1 |

### Broadland Village Clusters

| Settlement name/site                            | No of Respondents | Total No. of Reps | Support | Object | Comment |
|---|-------------------|-------------------|---------|--------|---------|
| <b>Blofield Heath and Hemblington</b>           |                   |                   |         |        |         |
| <b>Preferred Site Policy</b>                    |                   |                   |         |        |         |
| GNLP1048  | 4                 | 4                 | 1       | 1      | 2       |
| <b>Carried Forward/Uplift Allocation Policy</b> |                   |                   |         |        |         |
| BLO5  | 2                 | 2                 | 0       | 0      | 2       |
| <b>Reasonable Alternative Sites</b>             |                   |                   |         |        |         |
| No Sites  |                   |                   |         |        |         |
| <b>Unreasonable Sites</b>                       |                   |                   |         |        |         |
| GNLP0099  | 0                 | 0                 | 0       | 0      | 0       |
| GNLP0288  | 0                 | 0                 | 0       | 0      | 0       |
| GNLP0300  | 0                 | 0                 | 0       | 0      | 0       |
| GNLP2080  | 2                 | 2                 | 0       | 1      | 1       |
| GNLP2172  | 0                 | 0                 | 0       | 0      | 0       |
| <b>Buxton with Lamas and Brampton</b>           |                   |                   |         |        |         |
| <b>Preferred Site Policy</b>                    |                   |                   |         |        |         |
| GNLP0297  | 3                 | 3                 | 1       | 0      | 2       |
| <b>Carried Forward/Uplift Allocation Policy</b> |                   |                   |         |        |         |
| BUX1  | 2                 | 2                 | 0       | 0      | 2       |
| <b>Reasonable Alternative Sites</b>             |                   |                   |         |        |         |

|   |    |    |   |    |   |
|---|----|----|---|----|---|
| No Sites  |    |    |   |    |   |
| <b>Unreasonable Sites</b>                                 |    |    |   |    |   |
| GNLP0294  | 2  | 3  | 1 | 1  | 1 |
| GNLP0387  | 2  | 2  | 2 | 0  | 0 |
| GNLP0601  | 2  | 2  | 1 | 0  | 1 |
| GNLP3015  | 0  | 0  | 0 | 0  | 0 |
| GNLP3016  | 1  | 1  | 0 | 0  | 1 |
| <b>Cantley</b>  |    |    |   |    |   |
| <b>Preferred Site Policy</b>                              |    |    |   |    |   |
| No Sites  |    |    |   |    |   |
| <b>Carried Forward/Uplift Allocation Policy</b>           |    |    |   |    |   |
| No Sites  |    |    |   |    |   |
| <b>Reasonable Alternative Sites</b>                       |    |    |   |    |   |
| No Sites  |    |    |   |    |   |
| <b>Unreasonable Sites</b>                                 |    |    |   |    |   |
| GNLP0281  | 0  | 0  | 0 | 0  | 0 |
| <b>Cawston, Brandiston and Swannington</b>                |    |    |   |    |   |
| <b>Preferred Site Policy</b>                              |    |    |   |    |   |
| GNLP0293  | 2  | 2  | 0 | 2  | 0 |
| <b>Carried Forward/Uplift Allocation Policy</b>           |    |    |   |    |   |
| CAW1  | 1  | 1  | 0 | 0  | 1 |
| CAW2  | 3  | 3  | 0 | 2  | 1 |
| <b>Reasonable Alternative Sites</b>                       |    |    |   |    |   |
| No Sites  |    |    |   |    |   |
| <b>Unreasonable Sites</b>                                 |    |    |   |    |   |
| GNLP0126 A and B  | 3  | 3  | 0 | 3  | 0 |
| GNLP2134  | 0  | 0  | 0 | 0  | 0 |
| <b>Coltishall, Horstead with Stanninghall and Belaugh</b> |    |    |   |    |   |
| <b>Preferred Site Policy</b>                              |    |    |   |    |   |
| GNLP2019  | 49 | 51 | 1 | 45 | 5 |
| <b>Carried Forward/Uplift Allocation Policy</b>           |    |    |   |    |   |
| COL1  | 8  | 9  | 0 | 8  | 1 |
| COL2  | 4  | 4  | 0 | 2  | 2 |
| <b>Reasonable Alternative Sites</b>                       |    |    |   |    |   |
| No Sites  | 0  | 0  | 0 | 0  | 0 |
| <b>Unreasonable Sites</b>                                 |    |    |   |    |   |
| GNLP0265  | 0  | 0  | 0 | 0  | 0 |
| GNLP0388  | 1  | 1  | 0 | 1  | 0 |
| GNLP1056  | 1  | 1  | 0 | 1  | 0 |
| GNLP2072  | 0  | 0  | 0 | 0  | 0 |
| <b>Foulsham and Themelthorpe</b>                          |    |    |   |    |   |
| <b>Preferred Site Policy</b>                              |    |    |   |    |   |
| GNLP0605  | 15 | 15 | 0 | 14 | 1 |
| <b>Carried Forward/Uplift Allocation Policy</b>           |    |    |   |    |   |
| FOU2  | 3  | 3  | 0 | 2  | 1 |
| <b>Reasonable Alternative Sites</b>                       |    |    |   |    |   |
| No Sites  |    |    |   |    |   |
| <b>Unreasonable Sites</b>                                 |    |    |   |    |   |

|  |   |   |   |   |   |
|--|---|---|---|---|---|
| GNLP0275   | 0 | 0 | 0 | 0 | 0 |
| GNLP0607   | 0 | 0 | 0 | 0 | 0 |
| GNLP2001   | 0 | 0 | 0 | 0 | 0 |
| <b>Freethorpe, Halvergate and Wickhampton</b>  |   |   |   |   |   |
| <b>Preferred Site Policy</b>   |   |   |   |   |   |
| GNLP2034   | 2 | 2 | 0 | 0 | 2 |
| <b>Carried Forward/Uplift Allocation Policy</b>  |   |   |   |   |   |
| FRE1   | 2 | 2 | 0 | 1 | 1 |
| <b>Reasonable Alternative Sites</b>  |   |   |   |   |   |
| No Sites   |   |   |   |   |   |
| <b>Unreasonable Sites</b>  |   |   |   |   |   |
| GNLP2033   | 0 | 0 | 0 | 0 | 0 |
| <b>Frettenham</b>  |   |   |   |   |   |
| <b>Preferred Site Policy</b>   |   |   |   |   |   |
| No Sites   |   |   |   |   |   |
| <b>Carried Forward/Uplift Allocation Policy</b>  |   |   |   |   |   |
| No Sites   |   |   |   |   |   |
| <b>Reasonable Alternative Sites</b>  |   |   |   |   |   |
| No Sites   |   |   |   |   |   |
| <b>Unreasonable Sites - Residential</b>  |   |   |   |   |   |
| GNLP0492   | 5 | 5 | 4 | 1 | 0 |
| GNLP2078   | 2 | 2 | 0 | 1 | 1 |
| <b>Unreasonable Sites - Non-residential</b>  |   |   |   |   |   |
| GNLP2076   | 2 | 2 | 0 | 1 | 1 |
| <b>Great and Little Plumstead</b>  |   |   |   |   |   |
| <b>Preferred Site Policy</b>   |   |   |   |   |   |
| No Sites   | 1 | 1 | 0 | 1 | 0 |
| <b>Carried Forward/Uplift Allocation Policy</b>  |   |   |   |   |   |
| No Sites   |   |   |   |   |   |
| <b>Reasonable Alternative Sites</b>  |   |   |   |   |   |
| No Sites   |   |   |   |   |   |
| <b>Unreasonable Sites - Residential</b>  |   |   |   |   |   |
| GNLP0328   | 2 | 2 | 2 | 0 | 0 |
| GNLP0330   | 2 | 2 | 2 | 0 | 0 |
| GNLP0420R  | 3 | 3 | 1 | 2 | 0 |
| GNLP0441R  | 1 | 1 | 1 | 0 | 0 |
| GNLP0483   | 3 | 3 | 2 | 0 | 1 |
| GNLP2040   | 2 | 2 | 2 | 0 | 0 |
| GNLP3007   | 2 | 2 | 2 | 0 | 0 |
| GNLP3014   | 3 | 3 | 2 | 1 | 0 |
| <b>Unreasonable Sites - Non-residential</b>  |   |   |   |   |   |
| GNLP2107   | 2 | 2 | 1 | 0 | 1 |
| GNLP3034   | 1 | 1 | 1 | 0 | 0 |
| <b>Great Withingham, Lenwade, Weston Longville, Alderford, Attlebridge, Little Withingham and Morton on the Hill</b> |   |   |   |   |   |
| <b>Preferred Site Policy</b>   |   |   |   |   |   |
| GNLP0608   | 6 | 6 | 1 | 0 | 5 |

|   |   |   |   |   |   |
|---|---|---|---|---|---|
| <b>Carried Forward/Uplift Allocation Policy</b> |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Reasonable Alternative Sites</b>             |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Unreasonable Sites - Residential</b>         |   |   |   |   |   |
| GNLP0460  | 0 | 0 | 0 | 0 | 0 |
| GNLP0548  | 2 | 2 | 0 | 1 | 1 |
| GNLP0553  | 0 | 0 | 0 | 0 | 0 |
| GNLP0586  | 0 | 0 | 0 | 0 | 0 |
| GNLP2129  | 0 | 0 | 0 | 0 | 0 |
| GNLP2184  | 0 | 0 | 0 | 0 | 0 |
| <b>Unreasonable Sites - Non-residential</b>     |   |   |   |   |   |
| GNLP2144  | 0 | 0 | 0 | 0 | 0 |
| <b>Hainford and Stratton Strawless</b>          |   |   |   |   |   |
| <b>Preferred Site Policy</b>                    |   |   |   |   |   |
| No Sites  | 1 | 1 | 0 | 0 | 1 |
| <b>Carried Forward/Uplift Allocation Policy</b> |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Reasonable Alternative Sites</b>             |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Unreasonable Sites</b>                       |   |   |   |   |   |
| GNLP0065  | 0 | 0 | 0 | 0 | 0 |
| GNLP0069  | 0 | 0 | 0 | 0 | 0 |
| GNLP0181  | 0 | 0 | 0 | 0 | 0 |
| GNLP0190  | 0 | 0 | 0 | 0 | 0 |
| GNLP0393  | 1 | 1 | 0 | 1 | 0 |
| GNLP0512  | 0 | 0 | 0 | 0 | 0 |
| GNLP0582  | 0 | 0 | 0 | 0 | 0 |
| GNLP2035  | 0 | 0 | 0 | 0 | 0 |
| GNLP2162  | 2 | 2 | 1 | 1 | 0 |
| <b>Hevingham</b>                                |   |   |   |   |   |
| <b>Preferred Site Policy</b>                    |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Carried Forward/Uplift Allocation Policy</b> |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Reasonable Alternative Sites</b>             |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Unreasonable Sites</b>                       |   |   |   |   |   |
| GNLP0292  | 0 | 0 | 0 | 0 | 0 |
| GNLP2002  | 1 | 1 | 1 | 0 | 0 |
| <b>Horsford Felthorpe and Haveringland</b>      |   |   |   |   |   |
| <b>Preferred Site Policy</b>                    |   |   |   |   |   |
| GNLP0264  | 3 | 3 | 0 | 1 | 2 |
| <b>Carried Forward/Uplift Allocation Policy</b> |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Reasonable Alternative Sites</b>             |   |   |   |   |   |
| No Sites  |   |   |   |   |   |

| <b>Unreasonable Sites - Residential</b>         |    |    |    |    |   |
|---|----|----|----|----|---|
| GNLP0059  | 1  | 1  | 1  | 0  | 0 |
| GNLP0151  | 1  | 1  | 1  | 0  | 0 |
| GNLP0153  | 1  | 1  | 1  | 0  | 0 |
| GNLP0192  | 1  | 1  | 1  | 0  | 0 |
| GNLP0222  | 0  | 0  | 0  | 0  | 0 |
| GNLP0251  | 0  | 0  | 0  | 0  | 0 |
| GNLP0283  | 2  | 2  | 1  | 1  | 0 |
| GNLP0302  | 0  | 0  | 0  | 0  | 0 |
| GNLP0332R                                       | 2  | 2  | 0  | 2  | 0 |
| GNLP0333  | 0  | 0  | 0  | 0  | 0 |
| GNLP0334R                                       | 2  | 2  | 0  | 2  | 0 |
| GNLP0359R                                       | 0  | 0  | 0  | 0  | 0 |
| GNLP0419  | 1  | 1  | 1  | 0  | 0 |
| GNLP0422  | 2  | 2  | 1  | 1  | 0 |
| GNLP0423  | 1  | 1  | 0  | 0  | 1 |
| GNLP0469  | 0  | 0  | 0  | 0  | 0 |
| GNLP0479  | 1  | 1  | 1  | 0  | 0 |
| GNLP0519  | 1  | 1  | 0  | 0  | 1 |
| GNLP0578  | 1  | 1  | 1  | 0  | 0 |
| GNLP1008  | 1  | 1  | 1  | 0  | 0 |
| GNLP1043  | 0  | 0  | 0  | 0  | 0 |
| GNLP2009  | 1  | 1  | 1  | 0  | 0 |
| GNLP2012  | 1  | 1  | 1  | 0  | 0 |
| GNLP2160  | 1  | 2  | 0  | 1  | 1 |
| GNLP3004  | 0  | 0  | 0  | 0  | 0 |
| GNLP3005  | 0  | 0  | 0  | 0  | 0 |
| <b>Unreasonable Site - Non-residential</b>      |    |    |    |    |   |
| GNLP2133  | 1  | 1  | 1  | 0  | 0 |
| GNLP2154  | 0  | 0  | 0  | 0  | 0 |
| <b>Horsham and Newton St Faith</b>              |    |    |    |    |   |
| <b>Preferred Site Policy</b>                    |    |    |    |    |   |
| GNLP0125  | 18 | 19 | 1  | 15 | 3 |
| <b>Carried Forward/Uplift Allocation Policy</b> |    |    |    |    |   |
| HNF1  | 4  | 4  | 0  | 3  | 1 |
| HNF2/GNLP0466R                                  | 5  | 5  | 1  | 1  | 3 |
| HNF3  | 6  | 6  | 1  | 0  | 5 |
| <b>Reasonable Alternative Sites</b>             |    |    |    |    |   |
| No Sites  |    |    |    |    |   |
| <b>Unreasonable Sites</b>                       |    |    |    |    |   |
| GNLP0085  | 0  | 0  | 0  | 0  | 0 |
| GNLP0246  | 0  | 0  | 0  | 0  | 0 |
| GNLP0471  | 0  | 0  | 0  | 0  | 0 |
| GNLP0482  | 22 | 22 | 19 | 1  | 2 |
| GNLP1054  | 5  | 6  | 5  | 1  | 0 |
| GNLP2021  | 2  | 2  | 2  | 0  | 0 |
| GNLP2030  | 2  | 2  | 1  | 1  | 0 |

|   |    |    |    |    |   |
|---|----|----|----|----|---|
| GNLP2141  | 3  | 3  | 3  | 0  | 0 |
| GNLP3027  | 6  | 6  | 4  | 0  | 2 |
| GNLP3028  | 7  | 8  | 6  | 0  | 2 |
| <b>Lingwood and Burlingham, Strumpshaw and Beighton</b> |    |    |    |    |   |
| <b>Preferred Site Policy</b>                            |    |    |    |    |   |
| GNLP0379  | 74 | 92 | 2  | 81 | 9 |
| <b>Carried Forward/Uplift Allocation Policy</b>         |    |    |    |    |   |
| No Sites  | 3  | 3  | 0  | 2  | 1 |
| <b>Reasonable Alternative Sites</b>                     |    |    |    |    |   |
| GNLP0296  | 10 | 11 | 0  | 8  | 3 |
| GNLP0380  | 18 | 20 | 8  | 12 | 0 |
| <b>Unreasonable Sites</b>                               |    |    |    |    |   |
| GNLP0067  | 2  | 2  | 1  | 1  | 0 |
| GNLP0090  | 34 | 36 | 31 | 0  | 5 |
| GNLP0215  | 38 | 39 | 33 | 0  | 6 |
| GNLP0449  | 5  | 5  | 4  | 0  | 1 |
| GNLP0499  | 1  | 2  | 0  | 1  | 1 |
| GNLP0521  | 33 | 34 | 28 | 0  | 6 |
| GNLP2017  | 36 | 39 | 33 | 1  | 5 |
| <b>Marsham</b>  |    |    |    |    |   |
| <b>Preferred Site Policy</b>                            |    |    |    |    |   |
| GNLP2143  | 12 | 12 | 1  | 8  | 3 |
| <b>Carried Forward/Uplift Allocation Policy</b>         |    |    |    |    |   |
| No Sites  |    |    |    |    |   |
| <b>Reasonable Alternative Sites</b>                     |    |    |    |    |   |
| No Sites  |    |    |    |    |   |
| <b>Unreasonable Sites</b>                               |    |    |    |    |   |
| GNLP0171  | 0  | 0  | 0  | 0  | 0 |
| GNLP0219  | 0  | 0  | 0  | 0  | 0 |
| GNLP0229  | 0  | 0  | 0  | 0  | 0 |
| GNLP0572  | 0  | 0  | 0  | 0  | 0 |
| GNLP3035  | 2  | 2  | 0  | 2  | 0 |
| <b>Reedham</b>  |    |    |    |    |   |
| <b>Preferred Site Policy</b>                            |    |    |    |    |   |
| GNLP1001  | 38 | 41 | 1  | 36 | 4 |
| GNLP3003  | 45 | 58 | 1  | 50 | 7 |
| <b>Carried Forward/Uplift Allocation Policy</b>         |    |    |    |    |   |
| No Sites  | 3  | 4  | 0  | 3  | 1 |
| <b>Reasonable Alternative Sites</b>                     |    |    |    |    |   |
| No Sites  | 1  | 1  | 0  | 1  | 0 |
| <b>Unreasonable Sites</b>                               |    |    |    |    |   |
| No Sites  |    |    |    |    |   |
| <b>Salhouse, Woodbastwick and Ranworth</b>              |    |    |    |    |   |
| <b>Preferred Site Policy</b>                            |    |    |    |    |   |
| GNLP0188  | 3  | 3  | 2  | 0  | 1 |
| <b>Carried Forward/Uplift Allocation Policy</b>         |    |    |    |    |   |
| No Sites  |    |    |    |    |   |



|   |   |   |   |   |   |
|---|---|---|---|---|---|
| <b>Reasonable Alternative Sites</b>             |   |   |   |   |   |
| GNLP0157  | 1 | 1 | 0 | 0 | 1 |
| <b>Unreasonable Sites</b>                       |   |   |   |   |   |
| GNLP0110  | 0 | 0 | 0 | 0 | 0 |
| GNLP0160  | 0 | 0 | 0 | 0 | 0 |
| GNLP0161  | 0 | 0 | 0 | 0 | 0 |
| GNLP0163  | 0 | 0 | 0 | 0 | 0 |
| GNLP0164  | 0 | 0 | 0 | 0 | 0 |
| GNLP0175  | 1 | 1 | 0 | 1 | 0 |
| GNLP0189  | 1 | 1 | 0 | 1 | 0 |
| GNLP0226  | 1 | 1 | 0 | 1 | 0 |
| GNLP0487  | 2 | 2 | 0 | 2 | 0 |
| GNLP0493  | 0 | 0 | 0 | 0 | 0 |
| <b>South Walsham and Upton with Fishley</b>     |   |   |   |   |   |
| <b>Preferred Site Policy</b>                    |   |   |   |   |   |
| GNLP0382  | 2 | 2 | 1 | 0 | 1 |
| <b>Carried Forward/Uplift Allocation Policy</b> |   |   |   |   |   |
| SWA1  | 2 | 2 | 0 | 1 | 1 |
| <b>Reasonable Alternative Sites</b>             |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Unreasonable Sites</b>                       |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Spixworth and Crostwick</b>                  |   |   |   |   |   |
| <b>Preferred Site Policy</b>                    |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Carried Forward/Uplift Allocation Policy</b> |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Reasonable Alternative Sites</b>             |   |   |   |   |   |
| No Sites  |   |   |   |   |   |
| <b>Unreasonable Alternatives</b>                |   |   |   |   |   |
| GNLP0467  | 1 | 1 | 0 | 1 | 0 |

### South Norfolk Villages – Non Residential Sites

| Settlement name/site                        | No of Respondents | Total No. of Reps | Support | Object | Comment |
|---|-------------------|-------------------|---------|--------|---------|
| <b>Preferred Site Policy</b>                |                   |                   |         |        |         |
| No Sites                                    |                   |                   |         |        |         |
| <b>Carried Forward Policy</b>               |                   |                   |         |        |         |
| Brooke – BKE3                               | 3                 | 3                 | 0       | 1      | 2       |
| <b>Unreasonable Non-residential Sites</b>   |                   |                   |         |        |         |
| Bunwell - GNLP0224                          | 1                 | 1                 | 0       | 0      | 1       |
| Gillingham (including Haddiscoe) - GNLP0455 | 0                 | 0                 | 0       | 0      | 0       |
| Mulbarton Cluster (Ketteringham) - GNLP0245 | 0                 | 0                 | 0       | 0      | 0       |

|  |    |    |    |   |   |
|--|----|----|----|---|---|
| Mulbarton Cluster (East Carleton) - GNLP2165                       | 0  | 0  | 0  | 0 | 0 |
| Newton Flotman Cluster (Swainsthorpe) - GNLP0604R                  | 15 | 17 | 11 | 3 | 3 |
| Seething Cluster (Mundham) - GNLP0071R                             | 0  | 0  | 0  | 0 | 0 |
| Stoke Holy Cross Cluster (Caistor St Edmund and Bixley) - GNLP2158 | 0  | 0  | 0  | 0 | 0 |
| Tacolneston - GNLP0545   | 0  | 0  | 0  | 0 | 0 |
| Tacolneston - GNLP0546   | 0  | 0  | 0  | 0 | 0 |
| Tivetshall St Mary and St Margaret -GNLP2128                       | 1  | 1  | 0  | 1 | 0 |
| Wreningham Cluster (Ashwellthorpe) - GNLP2182                      | 0  | 0  | 0  | 0 | 0 |

**Greater Norwich Development Partnership (GNDP)**

|                     |   |
|---------------------|---|
| <b>Report title</b> | <b>Draft Greater Norwich Local Plan revised timetable</b> |
|---------------------|---|

|             |                                  |
|-------------|----------------------------------|
| <b>Date</b> | <b>10<sup>th</sup> July 2020</b> |
|-------------|----------------------------------|

**Summary**

This report presents a proposed revised timetable for the remaining stages of the Greater Norwich Local Plan (GNLP).

**Recommendation**

**It is recommended that the Board endorses the timetable for progressing the GNLP and that districts update their Local Development Schemes accordingly.**

## Introduction

- 1.1 This paper sets out a proposed revised timetable for the remaining stages of the Greater Norwich Local Plan (GNLP), following the initial representations made on the Draft Plan (Regulation 18) consultation and revised circumstances in the light of the Covid-19 pandemic. This informs the preparation of the Local Development Schemes which are required to be produced by the individual local planning authorities.
- 1.2 The current timetable for the GNLP was agreed in January this year alongside the agreement to publish the Regulation 18 consultation draft version of the plan.
- 1.3 Since January the Regulation 18 consultation has generated significant interest in the plan and a large number of representations and comments have been received by the GNLP team. These representations have been summarised in the previous report but to ensure that proper consideration is given to these comments additional time is required.
- 1.4 Furthermore, to ensure that the evidence base is as robust as possible and to have regard to new Government planning policy (the publication of which has been delayed), it will be necessary for the GNLP to agree the content of the Regulation 19 draft of the plan following the elections in May next year rather than November 2020 as in the current timetable. This delay will also enable the GNLP team to overcome some of the practical impacts of Covid-19 on the team's workstreams.
- 1.5 As referred to above, it is considered necessary to ensure that the evidence base is as robust as possible and so further work will be carried out on the following areas:
  - Housing needs and delivery issues – the Greater Norwich partners can demonstrate a very strong record of delivery, particularly in South Norfolk, over recent years but the draft plan will have to have regard to the revised standard methodology. It was previously expected to be published in June, but this has now been delayed, most likely until autumn this year. Until this is published it will be difficult to respond to the technical objections to the current overall level of growth. The draft version of the plan does not include windfall housing development in calculating its housing numbers and has a 9% buffer to ensure delivery. These could be taken into account, together with the high rates of recent housing delivery, when considering the outcomes of the new methodology on overall housing numbers.
  - In addition, further work is necessary to update delivery/supply figures, to engage with the industry over delivery prospects in the light of market circumstances and funding decisions, and to update the Strategic Housing Market Assessment (SHMA). The SHMA is being produced jointly across six Norfolk districts and will confirm housing needs for the different types of affordable housing and for specialist forms of housing for the elderly and students;
  - Viability Study and CIL evidence - revised typologies are intended to be established for the next stage of the Viability Study, with strategic sites requiring dedicated viability appraisals to be provided by site proposers. As a result of Covid-19 there is currently significant uncertainty around development viability. This uncertainty will reduce over time. This suggests that related CIL work would best be commenced no earlier than autumn 2020 with the intention that it should be completed for consultation in parallel with GNLP Regulation 19. This integration of plan viability assessment and CIL review could not happen if the Regulation 19 consultation is in early 2021 as per the current timetable.
  - Economic Evidence – updated evidence will be needed to reflect the likely impacts of both Brexit and the Covid-19 crisis. It is too early to commission such a study update

at present due to the degree of economic uncertainty, so again autumn 2020 would be the earliest time to begin to produce this evidence.

## Revised Timetable

- 2.1 Given current resources it is not considered possible for all necessary evidence to be produced in support of a sound plan and get endorsement of the draft Regulation 19 version of the plan prior to the local government elections due in May 2021.
- 2.2 This means it will be possible to undertake further focussed consultation on possible changes to the plan without introducing further delay to the timetable. This is considered advantageous in reducing risks to soundness and allowing improvements to the plan.
- 2.3 In particular a further focussed consultation would allow the GNDP to reflect the considerable progress that has been made in relation to the Norwich Western Link scheme and consult on the possibility of including a specific allocation for the use of the land for it within the GNLP. Not only would such an allocation reflect good practice through the integration of transport and land use planning, it also has the potential to strengthen the robustness of both the GNLP and the scheme. Any allocation would need to be supported by a considerable evidence base such as a wider package of transport planning measures to be included in the Transport for Norwich Strategy (TfN) and consideration of reasonable alternatives.
- 2.4 There may also be advantages in including other possible policy changes or emerging evidence within the scope of any focussed consultation. Further reports will be prepared for consideration by the GNDP of the scope of the focussed consultation over the summer.
- 2.5 The proposed revised timetable is as follows:

| Production timetable                         | Current timetable | Revised timetable          | Notes  |
|--|-------------------|----------------------------|--|
| Regulation 18 consultation ends              | 16/03/20          | 16/03/20                   |  |
| GNDP board meeting (public)                  |                   | 10 July                    |  |
| Focussed Reg. 18 consultation                |                   | 02/11-14/12 2020           | 6 week consultation  |
| Purdah/elections                             |                   | End March – early May 2021 | Post-Reg. 18(d) 8 weeks allocated for inputting and processing reps, then 8 weeks to finalise Reg. 19 plan then 6 weeks for final SA etc |
| Reg. 19 Plan to be endorsed by GNDP (public) | 19/11/20          | Late June 21               | Allowing for post-election allocation to committees etc  |

|  |              |                |  |
|--|--------------|----------------|--|
|  |              |                | and pre-Cabinet committee processes  |
| Cabinets agree Reg. 19 plan                            | 18/12/20     | Late July 21   |  |
| Reg. 19 consultation on soundness and legal compliance | Jan/March 21 | August/Sept 21 | Timescale reduced between Reg. 19 and submission as post-election period                 |
| Submission of GNLP to the Secretary of State           | June 21      | Oct/Nov 21     | The period from submission to examination will be dependent on the Planning Inspectorate |
| Public Examination                                     | Nov/Dec 21   | Feb/Mar 22     |  |
| Consultation on proposed main modifications            | Feb/March 22 | Jun/Jul 22     | Dates depend on the outcome of the examination   |
| Publication of inspector's report                      | June 22      | Sept 22        |  |
| Adoption of the Greater Norwich Local Plan             | Aug/Sept 22  | Nov/Dec 22     |  |

| <b>Greater Norwich Development Partnership (GNDP)</b>   |   |
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| <b>Report title</b>   | <b>Emerging Government Policy and the Greater Norwich Local Plan (GNLP)</b> |
| <b>Date</b>   | <b>10<sup>th</sup> July 2020</b>  |
| <p><b>Summary</b></p> <p>This paper looks at two key elements of emerging government policy, Planning for the Future and the Environment Bill, along with a potentially significant Department for Transport (DfT) document, Decarbonising Transport. All three are likely to have some impacts on the GNLP.</p> <p><b>Recommendation</b></p> <p><b>GNDP members are recommended to note and comment on:</b></p> <ol style="list-style-type: none"> <li><b>1. emerging government policy for local plans;</b></li> <li><b>2. the intention to incorporate new national policy, where possible, into the emerging Greater Norwich Local Plan.</b></li> </ol> |   |

### **Background**

1. This paper looks at two key elements of emerging government policy, Planning for the Future and the Environment Bill, along with a potentially significant DfT document, Decarbonising Transport. All three are likely to have some impacts on the GNLP.

### **Planning for the Future**

2. The following table covers key elements of the government's *Planning for the Future* document, which sets out its plans for housing and planning following the announcements in the 2020 Budget. Many of these measures will be progressed through a Planning White Paper that *Planning for the Future* states will contain far reaching reforms.
3. The white paper was scheduled for release in spring 2020 before the current health crisis took hold. It was intended to be followed by a housing strategy later in the year, along with revisions to the Building Regulations and measures on rented and social housing. It now seems likely to be published before the summer recess of parliament on July 21<sup>st</sup> 2020.
4. Members may have noted recent articles in the press speculating that government, in the response to the Covid-19 crisis, may take a more radical approach than set out in *Planning for the Future*. Robert Jenrick, the Housing secretary, recently commented that the government wanted to “rethink planning from first principles” and “the time has come to speed up and simplify this country’s overly bureaucratic planning process”. The introduction of fundamental reforms would clearly have a significant impact on the role of GNLP. Officers will report back to the GNDP on the white paper’s content.
5. Table 1 below provides initial analysis of the potential implications of *Planning for the Future* on the GNLP. However, in the light of the above considerations and without the detail at this stage of how the national measures will be implemented, some impacts are difficult to predict. GNLP topic papers referenced in other papers on this agenda will provide detail on how best to address the issues highlighted in the table.
6. Depending on the scale of national reforms, overall, the draft GNLP provides a good basis to respond to change. This is largely due to the flexibility built into the draft.

**Table 1 Planning for the Future and the GNL**

| Planning for the Future Theme  | Potential Impact on the GNL  | Initial Response   |
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| <b>Direct impacts on the GNL</b>   |  |  |
| <b>FOCUSSING DEVELOPMENT IN AND AROUND URBAN AREAS</b>   |  |  |
| This will be assisted by:  |  |  |
| <p><b>Review of the Standard methodology</b></p> <p>The government is to review the methodology for calculating local housing need to encourage "greater building within and near to urban areas" and make sure the country is planning for the delivery of 300,000 new homes a year (<i>see also the timetable report on this agenda</i>).</p>  | <p>This could amend the overall housing requirement established through the standard methodology which was scheduled to be released in June and now looks likely to be available in the autumn.</p>  | <p>This matter will be kept under review and addressed in the housing topic paper in the light of:</p> <ul style="list-style-type: none"> <li>- The new standard methodology;</li> <li>- Updated evidence on likely delivery rates based on monitoring returns and engagement with industry;</li> <li>- Evidence that may be provided in the forthcoming Strategic Housing Market Assessment (SHMA) for Central and East Norfolk (<i>see also other papers</i>).</li> </ul>  |
| <p><b>Making the most of brownfield land</b></p> <p>As well as regenerating disused sites, this will include housing-led regeneration of high streets, densification around public transport hubs and "gentle" densifying of existing residential areas in line with local character.</p> <p>Mechanisms to achieve this include:</p> <ol style="list-style-type: none"> <li>1. Consultation on a right for demolition of commercial buildings and replacement with housing;</li> <li>2. Permitted development (PD) rights to be revised "to encourage building upwards" (up to 2 storeys);</li> <li>3. Launching a national brownfield map;</li> <li>4. A call for proposals for building above stations.</li> </ol> | <p>The PD changes could have significant implications for the plan depending on the implementation detail. The removal of the need for planning permission to replace commercial properties with housing would reduce the potential to plan strategically which relies on the granting of permissions. It would thus have implications for many of our settlements.</p> <p>The proposals "to encourage building upwards" are at odds with the Reg.18 consultation focus from Historic England on having detailed tall buildings policy with supporting SPDs in historic cities like Norwich.</p> <p>The national brownfield map will support the GNL policy aims, while locally the potential for increasing densities would be around, rather than above, railway stations.</p> | <p>As the PD measures will be untested the GNL will not be well placed to anticipate their outcomes. However, we could consider amending our windfall estimates to take account of the potential additional housing delivery resulting of these PD rights.</p> <p>Housing led regeneration of high streets would be welcomed in principle if it were in a controlled manner. However, the only measure that appears to support this in the document is PD for demolition of commercial buildings and replacement with housing. This could well be at odds with the current policy emphasising the need to support retail and employment uses in our city and town centres and on having allocated employment areas without conflicting uses.</p> <p>The detail of how this PD right is implemented will be key. If the definition of "commercial" includes retail units and demolition and replacement becomes PD, we may have to think again as our plan would have limited controls for taking a strategic approach to supporting town centres and retaining employment areas.</p> <p>A government statement on July 1<sup>st</sup> has since provided more clarity on related changes to the Use Class Order. It said that buildings used for retail "would be able to be permanently used as a café or office without requiring a planning application and local authority approval". However, it added that "pubs, libraries, village shops and other types of uses essential to the lifeblood of communities</p> |



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|  |   | <p>will not be covered by these flexibilities".</p> <p>There is a need to consider the potential for increasing densities in urban areas, especially around stations. This could potentially affect Wymondham and Diss, as well as Norwich. Further work is being done on maximising brownfield delivery.</p> <p>The Brownfield Sites Map will assist in disseminating information on such sites, potentially encouraging investment and speeding up delivery of brownfield sites, mainly in central Norwich.</p>   |
| <b>SUPPORTING COMMUNITY AND SELF-BUILD HOUSING</b>   |   |   |
| <p>The government intends to support those who want to build their own homes to find plots of land and provide help to parish councils and neighbourhood forums who wish to build a small number of homes, providing homes for the next generation and those wishing to downsize.</p>  | <p>When detailed, these measures are likely to be supportive of the approach taken in the draft GNLP which broadly anticipates these government policy aims.</p>  | <p>There will be a need to assess our plan approach through our topic papers, especially policies 5 (housing) and 7.4 (village clusters), in the light of any detail government publishes on how it intends its policy aim to be implemented. The thrust of the draft GNLP aligns with emerging government policy.</p>  |
| <b>DESIGN AND ENVIRONMENTAL ISSUES</b>   |   |   |
| <p><b>Design</b><br/><i>Planning for the Future</i> commits the government to implementing many of the Building Better Building Beautiful Commission's <a href="#">final report</a> recommendations. This includes a <a href="#">National Design Guide</a> which was published in 2019 and the new National Model Design Code (NMDC) which is expected to be launched in autumn this year.</p> <p>The NMDC will set design parameters to be included in local design codes<sup>1</sup>. In the absence of local design guidance, local planning authorities will be expected to defer to the National Design Guide and the forthcoming NMDC.</p> | <p>This supports the approach being taken through the draft GNLP of providing a strategic framework on design for more detailed policies and guidance in subsequent DM policies and/or SPDs.</p>  | <p>Policy 3 of the draft GNLP requires developments to create a distinct sense of place and to enhance local character taking account of local design guidance. This provides the strategic hook for any updates needed to local design guidance which the publication of the NMDC will assist. In the light of concerns expressed by Historic England through the Reg.18 consultation over the separation of DM policies from the strategy and over policy covering tall buildings in the city centre in particular, it will be important to liaise further with them on this approach. The stance taken by Historic England is no doubt reflective of advice set out in their recent consultation <a href="#">tall buildings advice note</a>.</p> |
| <p><b>Future Homes Standard (FHS)</b><br/>From 2025, the FHS will require up to 80% lower carbon emissions for all new homes.</p>  | <p>If implemented as indicated through a recent consultation, this change will make the draft GNLP Policy 2 local energy standard redundant. This is because a more demanding national interim standard than currently set through the draft GNLP will be in the Building Regulations this year and it will no longer</p> | <p>Consequent potential changes to the GNLP will be assessed through the topic paper.</p>   |

<sup>1</sup> The National Design Guide defines a design code as : A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.

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|  | be possible to set local standards. By 2025 this national standard will be raised to an 80% cut against current Building Regulations.  |  |
| <b>Flood Risk</b><br>The government will review policy for building in flood risk areas.   | This is most likely to have an impact on sites along the River Wensum in Norwich.  | There will be a need to consider outcomes from the national review and ensure that the Level 2 Strategic Flood Risk Assessment (L2SFRA), which is currently being commissioned, is robust in justifying the potential for high density development adjacent to the Wensum. |
| <b>Model development</b><br>A new "net zero development" will be established in Toton, Nottinghamshire, where a new HS2 station is planned.  | Limited initially  | In the long term, the policy approach and measures established to implement net zero development at Toton could provide a model for our area.  |
| <b>WIDER CHANGES TO PLANNING</b>   |  |  |
| <b>Up to date local plans</b><br>All local authorities will be required to have an up to date local plan by December 2023 or face central government intervention.   | This would have no impact unless the current timetable for adoption (late summer 2022) or the proposed date in the timetable paper (spring 2023) significantly slip.   | It is important that any slippage to the timetable is minimised.   |
| <b>Zoning</b><br>The White Paper will expand the use of "zoning tools" such as local development orders (LDOs) to support development.   | The only mention of LDOs in the current draft plan relates to the Food Enterprise Park.  | We should consider whether LDOs have wider potential through the GNLP through our topic paper.   |
| <b>Speeding up housing delivery</b><br>The White Paper will: <ul style="list-style-type: none"> <li>• explore wider options to encourage planning permissions to be built out more quickly;</li> <li>• include measures to improve the effectiveness, take up and role of CPOs to help facilitate land assembly and infrastructure delivery.</li> </ul>  | There will be an impact if the government's measures are successful, especially if they are used locally by a Special Purpose Vehicle (SPV), on speeding up trajectories for housing delivery and on the delivery of infrastructure. | There is a need to assess the impact on calculating trajectories for the Reg. 19 version of the plan and to assess whether changes are required to the Delivery Statement and policy 4 on strategic infrastructure.  |
| <b>Indirect impacts of the GNLP</b>  |  |  |
| <b>New Homes Bonus</b><br>The government intends to consult on this shortly.   | This could provide additional resources for delivery of the GNLP and greater acceptance of growth needs.   |  |
| <b>Affordable housing</b><br>£12 billion of government investment is expected to bring in around a further £38 billion public and private investment. The aim is to deliver more affordable housing and social rent homes, helping those in areas of the country where affordability is most acute.  | These measures could present opportunities for accessing funding to support affordable housing delivery locally.   |  |
| <b>Home Ownership</b><br>Government will: <ul style="list-style-type: none"> <li>• Consult on the <b>First Homes scheme</b> to cut costs for people buying their first homes and is looking to partner with developers and local authority front runners;</li> <li>• Encourage <b>long-term fixed rate mortgages</b>;</li> <li>• Introduce <b>Shared Ownership national model</b> to simplify approach.</li> </ul> | Consultation has taken place on the First Homes Scheme and the authorities responded separately.   |  |

#### Other measures with limited impact on the GNLP

The Planning White Paper will:

- include measures to allow successful appellants against refusals of planning applications to have their application fee refunded;
- introduce a performance related planning fee structure;
- maximise the potential of new technologies to modernise the planning system (assuming this relates largely to DM decision making, though there could be implications for plan making).

## The Environment Bill

### New requirements

7. The Environment Bill establishes a number of measures and requirements to support biodiversity:
  - Councils will have to "enhance" as well as "conserve" biodiversity and to publish reports on how they will do this;
  - The bill **requires biodiversity net gain** of 10 per cent on most developments<sup>2</sup>. The NPPF and draft GNLP currently only **encourage** such gains. If developers cannot deliver on-site biodiversity improvements, they will have to buy credits as compensation, though this is a last resort with biodiversity retention and enhancement the priorities. Credit prices will be set by government, after consultation, "*at a level that does not discourage*" development, with details to follow. Habitats created to deliver net gain must be maintained for at least 30 years;
  - To support this, a **biodiversity metric** to calculate the biodiversity value of any habitat will be published;
  - Government will set up a **register** of compensatory habitat sites including information on what development is being offset;
  - There will also be a requirement to create **local nature recovery strategies** identifying where compensatory biodiversity can be delivered. These will "*support better spatial planning for nature recovery by setting out priorities and opportunities for protecting and investing in nature within a local area*". Details will be set out in future regulations, including a decision on whether upper- or lower-tier authorities will be responsible for preparing the strategies. The strategies will include:
    - a **statement of biodiversity priorities**, including descriptions of the plan area and biodiversity and priorities for recovery or enhancement;
    - **local habitat maps** showing existing nature assets, including protected sites and wildlife-rich habitats, and identifying key opportunities for enhancement.
8. The bill also proposes a legally binding target to reduce fine particulate matter (PM2.5) and increase local authority powers to address sources of air pollution.

### Implications for the GNLP

9. The text of the draft plan clearly references the intention to make biodiversity net gain a mandatory requirement at the Reg.19 stage once the Environment Bill is enacted, so policy 3 will be updated to require rather than request biodiversity net gain.
10. In addition, the draft GNLP already has a significant focus on further developing our green infrastructure network. This will be revisited in the light of the new requirements. During the plan period, biodiversity policy will be supported by use of DEFRA's biodiversity metric, national and possibly local guidance and the new local nature recovery strategy which will have to be produced. This will need to include Greater Norwich's statement of biodiversity priorities and local habitat maps. While it currently seems unlikely that the strategy would be completed in time to have a significant impact on the content of the GNLP, the draft is already well evidenced, with further evidence on green infrastructure and biodiversity being worked on. As part of this, the approach to Suitable Alternative Natural Greenspace (SANGs) and green infrastructure to address Habitat Regulation Assessment (HRA) issues will also need to be clarified in the Regulation 19 version to reflect completed evidence studies.

### Wider Implications

11. Costs for developers and councils will increase as a result of the Environment Bill. Some commentators have suggested that these costs will be factored into the price paid by the developer to the landowner when buying the site.
12. Commentators have also stated that much of the information required to prepare the local nature recovery strategies is already available, with those authorities with well-staffed environment sections well placed to adapt to the new requirements. Sharing ecologists between local authorities to advise developers and assess whether gain plans are acceptable may be needed.
13. The existing JCS and emerging GNLP are supported by fairly comprehensive evidence studies and policies. There will be a need to review these and other biodiversity evidence, taking account of best practice, to

<sup>2</sup> Defra has stated that it would exempt permitted development and householder applications such as for extensions, as well as nationally significant infrastructure (and marine projects). It will also introduce narrow exemptions for the most constrained types of development and a specific exemption for certain brownfield sites (in secondary legislation).

assess what additional work will be required to produce the Greater Norwich Local Nature Recovery Strategy.

14. Some authorities are already considering acquiring land where biodiversity could be enhanced by developers, whilst developers and landowners may also set up new natural areas or develop existing ones and sell them as biodiversity credits.

### **Decarbonising Transport**

15. This [DfT document](#) paves the way for the “**Transport Decarbonisation Plan (TDP)** later in the year which *“Will set out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050”*. The document is important as it suggests the emergence of an approach within the DfT which is very supportive of active travel and public transport. The Covid-19 crisis has since publication of this document has given added impetus to this issue.

16. A couple of further quotes:

*“Public transport and active travel will be the natural first choice for our daily activities. We will use our cars less and be able to rely on a convenient, cost-effective and coherent public transport network”*. (Grant Shapps in the foreword).

*“..... the journey to net zero demands that transport as a whole sector moves further, faster. The TDP will take a coordinated, cross-modal approach to deliver the transport sector’s contribution to both carbon budgets and net zero”*. (page 5)