

APPENDIX 1

STRATEGY DOCUMENT – QUESTION SUMMARIES

QUESTION 1

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 1 - Please comment on or highlight any inaccuracies within the introduction
TOTAL NUMBER OF REPRESENTATIONS:	33 (30 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 14 Object, 18 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
20260 Brockdish & Thorpe Abbots Parish Council	Object	Two serious issues result in the GNLP being a flawed plan: (a) Overprovision of housing allocations without effective phasing of development. (see answer to Q.9. (b) Allowing land owners / builders to dictate if, when and how land is developed mean it is impossible to plan for sustainability. Aspirations regarding climate change need positive and pro-active policies which should lead the strategy.	Overall housing numbers too high Need for phasing of development Climate change policy should lead strategy
20461	Object	The Greater Norwich Local Plan is based upon the premise that economic growth is in itself a worthy objective. During a time when our planet's resources are being consumed far faster than they are being replaced, can you justify this premise? Simply "keeping up" with every other city is not a good justification because it maintains the status quo of impending climate disaster. When will Norwich be "big enough" for you?	Economic growth is not a worthy objective due to impending climate disaster

<p>20501 Marlingford and Colton Parish Council</p>	<p>Object</p>	<p>Phasing for the new housing sites is essential and any new sites should be placed on a reserve list and only used after the existing JCS sites. The current strategy invites land banking and cherry picking by developers.</p> <p>It is arguable that Norfolk already has an excess of approved sites, many in entirely the wrong locations to allow sustainable and environmentally sound growth. The 'village clusters' concept is unsound and based on erroneous assumptions of existing infrastructure and future use.</p>	<p>Need for phasing of development</p> <p>Norfolk may have an excess of approved housing sites, many in unsustainable locations</p> <p>Village clusters unsound due to erroneous assumptions on infrastructure use.</p>
<p>20665 CPRE 20739 Hempnall Parish Council 23096 Salhouse Parish Council</p>	<p>Object Comment</p>	<p>Major concern Draft Strategy makes no mention of using phasing for new housing. Any new sites allocated in the GNLP should be phased by being placed on a reserve list, and under phased development only built out when most of the existing JCS sites have been used. Inclusion of all the sites for immediate development will lead to developers cherry-picking the most profitable sites. Newly allocated green field sites in less sustainable locations will be developed first, with even more land banking of currently allocated sites. Deliver the already allocated 82% of the 44,500 new homes, before giving permissions on the remaining 18%.</p> <p>JCS in place for just over 6 years - considered blueprint until 2026. It provided clear signals about where growth should and should not take place. Question how the response to this has changed so markedly since adoption of the JCS well before that Local Plan was due to expire. In particular, the NDR was largely intended to help the distribution of traffic to and from new housing built inside its length and in the northeast growth triangle. Moreover, there was a clear focus for housing and other growth to be in and close to Norwich, with minimal new development to be permitted in the rural policy areas. The GNLP strategy seems to be contradicting the direction of travel envisaged in the JCS and appears to</p>	<p>Deliver existing allocations before permitting new sites (use reserve list).</p> <p>GNLP contradicts and undermines the JCS which limits growth in rural areas</p> <p>Move to a post carbon economy and protection and enhancement of environmental assets promoted by GNLP cannot be achieved with the amount of dispersed growth it has in rural areas</p>

		<p>undermine the planning process. A great strength of the JCS is the protection it gave to the rural areas: this seems to be sacrificed in the GNLP Draft Plan.</p> <p>The Introduction is clear that the GNLP must also assist the move to a post-carbon economy and protect and enhance our many environmental assets. It will be difficult if not impossible to meet these targets if new housing to the scale proposed in the draft strategy is dispersed across the rural areas of Broadland and South Norfolk. The main justification for this appears to be the availability of primary school places in the village clusters, whereas there are more important measures for sustainability which should be taken into account, including the number of car journeys and journeys by delivery vehicles to new housing, along with the associated congestion such vehicles will result in.</p> <p>Concerned that South Norfolk Village Clusters Housing Site Allocations document will not receive the same level of scrutiny as the main draft strategy document. We are also very concerned that the number of additional dwellings on top of the existing commitment of 1,349 houses is given as ~a minimum of 1,200 The use of the word minimum is unnecessary and potentially very alarming, as in effect this gives no limit to the maximum number of houses which could be allocated in those village clusters. Given the draft plan provides enough committed sites to accommodate 9% more homes than need (along with two contingency locations for growth) and does not include windfall developments in its housing totals, the word minimum should be replaced with maximum or up to as is the case with the figures for Broadland village clusters. Why is there this discrepancy in language between two authorities which are part of the same Local Plan: it appears to be inconsistent and illogical.</p>	<p>Use of school places to determine growth in village clusters should be replaced by vehicle trip generation</p> <p>Concern that there will be a lack of scrutiny of SNVC sites</p> <p>Internal inconsistency within the plan over the approach to SN + Broadland villages - additional dwellings in S. Norfolk village clusters are given as 'a minimum of 1,200' which gives no limit and is inconsistent with the Broadland approach.</p>
20744	Comment	<p>Para 6 " it needs to ensure that we can deliver well designed new developments to create attractive, sustainable..." . From my experience of the planning system, it is difficult for officers and committees to sustain or achieve this. The power lies in the hands of the development Team who may or may not aspire to a quality delivery.</p>	<p>New development in the hands of development team who may not aspire to quality design</p>

		Para 8 "planning flexibly" The whole GNLP document is based upon continuing and continual growth, when the world resource account is overdrawn. Everlasting growth using finite resources of water and land is not sustainable.	GNLP based on unsustainable continual growth using finite resources such as water and land.
20791 Norwich Green Party	Comment	<p>Updates needed:</p> <ol style="list-style-type: none"> 1. Government has announced intention of bringing forward deadline to end sale of petrol/diesel cars and vans to 2035. This has implications for clean energy provision and local charging infrastructure. 2. Transforming Cities is likely to secure smaller funds for sustainable travel improvements, with serious implications for developing public transport upon which the Joint Core Strategy was predicated. There are no other sources of funding on the horizon for ensuring that existing and new strategic growth areas will be served by public transport to help encourage modal switch. 3. 'Planning for Future' includes measures to build greener homes. 	<p>Update using:</p> <p>Latest gov. policy on clean energy, local charging infrastructure and greener homes</p> <p>Likely reduced funding from Transforming Cities to support modal shift required by JCS</p>
20959 Easton Parish Council	Comment	As a parish council we have found this whole document difficult to navigate. We feel it has not been written in a way that will attract a high level of public comment. We feel that the inspector viewing this document should not accept its content and have it rewritten so that the community can engage with it. The web portal is difficult to navigate and is of poor design to encourage all members of society to engage with the questions being asked.	Document and web portal difficult to navigate and comment on. Document should be rewritten so that the community can engage with it.
21244 Lanpro Services	Comment	The proposed 2040 ban on petrol and diesel engines specified at paragraph 9 will need updating to 2032 - 2035 in light of the Governments consultation on this announced 4/2/2020.	
21273	Comment	Growth and sustainability are different goals. We should be wary of growth, a large amount of the increased demand for housing comes from an influx of population from Home counties and Midlands. People move to Norfolk because the "developed" environments they live in now have high crime, poor air quality, traffic congestion, bleak town centres, a plague of loneliness and mental health issues and degraded countryside.	Growth should be restricted to protect Norfolk's characteristics as a low density area and environmental assets.

		Intelligent planning is required to enshrine the quality of life we are able to enjoy in our low population density county and not to enslave ourselves to growth with all the disadvantages it brings.	
21340 Reedham PC	Comment	There is no mention of using phasing in the delivery of the new housing. New sites should not be allowed to be developed until those already allocated in the JCS have been built out.	Need for phasing of development
21489 and 23006 Hingham Town Council	Comment	<p>Hingham Town Council have engaged fully with the consultation.</p> <p>Consensus was that the GNLP consultation was poorly organised, was not inclusive and the GNLP website is not user friendly leading to public view that there is no point in engaging and decisions have already been made.</p> <p>Site assessments are extremely flawed.</p> <p>Site phasing required</p> <p>Preference for no further development in Hingham as recent development has provided insufficient improvements to infrastructure.</p> <p>Proposed housing numbers too high - smaller sized gradual development may be less impactful</p> <p>Development should provide affordable housing for local families, a range of suitable housing for a diverse population in appropriate locations.</p> <p>Infrastructure required includes:</p> <ul style="list-style-type: none"> • footways and pedestrian priority, • road safety improvements to the "Fairland crossroads" , increased primary school capacity, • public car park, 	<ul style="list-style-type: none"> • consultation and site selection processes; • the need for phasing of development; • the amount of growth suitable for Hingham; • whether GNLP policies will provide a range of housing including affordable housing supported by the named infrastructure and environmental improvements.

		<ul style="list-style-type: none"> • provision for green travel such as publicly available vehicle charging points, • extended green space for sports facilities, • an extension to the cemetery. <p>Hingham Town Council have recently acknowledged the Climate Emergency, any development needs to address and mitigate environmental impact, including in terms of sustainability, green issues, pollution, and wildlife habitat.</p>	
21709 Brown & Co	Support	<p>Whilst the role of the Norfolk Strategic Planning Framework is recognised, it is considered that additional emphasis should be placed upon the need to cooperate with neighbouring authorities given the scale of the Greater Norwich area and the level of growth proposed it is inevitable that this would have an impact upon need and delivery within surrounding districts.</p>	<p>The NSPF covers D to C issues within Norfolk effectively, addressing cross boundary strategic issues, most importantly identifying that all plans should meet their own housing need in full;</p> <p>SCC and East Suffolk and Mid Suffolk districts have all been engaged in the plan making process and have responded to the Reg. 18 consultation. No issues relating to the D to C have been raised.</p> <p>Assess whether a statement of common ground with relevant</p>

			Suffolk authorities is needed showing that D to C issues have been covered.
815 Barford Parish Council	Object	<ul style="list-style-type: none"> • this consultation seems to be a repeat of what was done a year or two ago, yet sites around Barford and Wrampingham are being considered again. This makes a mockery of previous consultations. • consultation documents and response procedures are of low quality as process is complex and there is too much expertise and information required to make a useful response which likely puts off members of the public. • Concerned by SN making its own plan, there are 4 very significant local sites being considered by them. • Consultation regarding these sites unlikely to occur until September/October 2020 as indicated by District Councillor Richard Elliot. • This means the sites won't be considered within scope of GNLP nor within this consultation exercise. • The NDR was understood to promote development of housing close to Norwich reducing the need for fragmentary and environmentally damaging rural development elsewhere. However, the GNLP seems to be ignoring this, and continuing to promote building on green-belt land in Broadland and South Norfolk where the Village Cluster sites are NOT OPEN FOR CONSIDERATION. • further concerns ref: SN lack of transparency are that the Village cluster approach will permit significant sized housing outside of local development boundaries and there is no maximum allocation, just a minimum which is above and beyond existing commitment. • lack of inclusion of all village cluster proposals in SN ward exclude parish council from making meaning contribution relating to local developments, isn't consistent with true and fair consultation approach and demonstrated that consultation exercise is incomplete. • Also endorse CPRE response. 	Note objections to plan making process and on the proposed distribution of growth.

21905 Home Builders Federation	Object	The NPPF states plans should be “reviewed to assess whether they need updating at least once every five years” and goes on to state that reviews “should be completed no later than five years after the adoption date of that plan”. As such the Council’s policy to review the plan 5 years after adoption is not consistent with national policy. The review must be completed prior to the plan being five years old to allow for the prompt updating of the plan if necessary. We would therefore suggest the following change is made: Change from "This plan will be reviewed 5 years after adoption" to - "The Councils will complete and publish a review of this plan 5 years after adoption to assess whether it needs to be updated."	Consider amending the strategy text to refer to the need to complete and publish a review of the GNLP 5 years after adoption to assess whether it needs to be updated to align with NPPF requirements.
22014 Mulbarton Parish Council	Comment	<ul style="list-style-type: none"> • The adopted Mulbarton Local Plan needs to form part of process. • Difficult to meet targets if dispersed across rural areas, especially as Mulbarton has seen dramatic growth in past 20 years which has exceeded provision of services for the community. • As part of the village cluster Mulbarton will not receive same level of scrutiny as main draft strategy. • Additional dwellings in S. Norfolk are given as ‘minimum of 1,200’ 	<p>Make use of research on JCS and GNLP policy approach + housing delivery for the villages.</p> <p>Since the SNVC plan will go through a full plan making process it will be subject to full scrutiny.</p>
22032 East Suffolk Council	comment	Para 15 refers to period to 2036, needs amending to 2038	Noted. Amend as suggested.
22244 Suffolk County Council	Comment	SCC would be interested to engage further with the progress of SNC’s ‘village clusters plan’ in respect to its relevance to Suffolk’s education provision and transport infrastructure.	Noted. Engage further with SCC on village clusters
22263 Barton Willmore	Comment	<ul style="list-style-type: none"> • Role of A11 and Cambridge Norwich Tech Corridor needs to be better reflected in wider growth strategy. • Sustainability agenda highlights need for growth in sustainable locations that have immediate needs served from a local community. • Possible that less affluent in society will be more affected by sustainability targets due to increased costs which places greater need for development to be planned of 	Consider the need for amendments to the Vision and Objectives and to the overall strategy based on the comments.

		<p>sufficient size to support wider range of local services and which will serve needs of local population and minimise small journey travel.</p> <ul style="list-style-type: none"> • Do not support proposal to reserve 1,200 homes to villages as part of separate plan pre-judges the number before a full assessment of where housing can most sustainably be located. Directing small scale growth in villages as advocated is at odds with principles of sustainable development. • Due to village growth being small scale, residents will rely more on cars as their will not be scope for additional growth in villages where developments occur. As such all site allocations should be in one plan allowing growth to be directed to settlements that have services and transport connections to support it. • rolling forward allocations suggest authorities have not assessed whether they are currently delivering growth. There is a significant shortfall against planned growth in the previous Joint Plan making the affordability of housing even less within the reach of the population as highlighted in the SHMA which shows the salary multiple in South Norfolk has become worse than the national average. It is essential that the plan identifies the most sustainable strategy for achieving the growth required rather than relying on previous allocations. 	
22281 Hugh Crane Ltd	Object	<ul style="list-style-type: none"> • The South Norfolk village cluster plan is a direct contradiction to the single plan approach and creates an element of uncertainty regarding the deliverability of some 1,200 homes across the Greater Norwich area. • the approach taken within the draft GNLP does not allocate sufficient sites and defers the allocation of a number of sites to another plan. In this regard, the draft GNLP conflicts with national policy. • no evidence demonstrating overall pattern of development in SN to be appropriate and sustainable, accounting for the reasonable alternatives, based on proportionate evidence. • Concern is raised that no formal timescales have been published in respect of the South Norfolk Village Clusters Plan. 	<p>Consider how to address objections noting that:</p> <ol style="list-style-type: none"> 1. The Planning Regulations and the NPPF (particularly paras. 17 to 19) make it clear that a local plan does not need to be a single document; 2. Evidence will be provided for the

			<p>Regulation 19 version to show the sites to meet the minimum 1,200 requirement in SNVCs;</p> <p>3. 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.</p> <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>
13365 Broadland Green Party	Comment	<ul style="list-style-type: none"> • Question assumption that local plan should be based on continued linear economic growth which is especially unsustainable in a county with limited opportunities for growth without permanently damaging environment and wellbeing of current residents and employees. 	Consider the need for amendments to the Introduction and to the

		<ul style="list-style-type: none"> • Plan should provide opportunity to consider a circular economy; designing out waste and pollution, keeping materials in use, transitioning to renewable energy and maintain and regenerate natural systems. • NPPF 2019 states that unless there are wholly exceptional reasons, developments should be refused if they would result in deterioration or loss of irreplaceable habitats. There is an urgent need to review developments such as the Wensum Valley western road link which would result in loss of irreplaceable habitats. • agree with assisting move to post-carbon economy and protecting and enhancing environmental assets, but consider it should be the heart of the plan rather than ‘assist the move’ 	<p>overall strategy based on the comments.</p>
<p>13366 Historic England</p>	<p>Object</p>	<p>Welcome reference to heritage and historic environment. Concerned that not proposing to update Development Management policies at present, would be helpful to read plan as a whole. Para20 states Development Management policies will not be amended except in very specific circumstances. Unclear what the statutory relationship between these documents will be. If GNLP is strategic level policies it’s unclear how existing development management policies will be able to deliver these objectives and vision given they already exist. This raises fundamental question regarding the ability of the overall plan to provide a sound, evidence based positive strategy for the conservation and enhancement of the historic environment given that the strategic part of the plan will be retrospectively formulated in isolation of the development management parts of the plan. The approach taken means that there will be a period where the development management policies will not synchronise with the new strategic policies. There is concern that this fundamentally undermines a truly integrated plan-led approach to long term development. We are concerned that the approach taken will result in any plan being unsound as it will in effect be incomplete and the component parts will not reflect each other. It is for these reasons that even in the event the GNLP is sound itself; it is very unlikely that we will be able to confirm that the entire plan is sound. At this stage we must again advise that the</p>	<p>The continued use of existing DM policies is regarded as sound as the Planning Regulations and the NPPF (particularly paras. 17 to 19) make it clear that a local plan does not need to be a single document.</p> <p>The GNLP meets the NPPF requirement (paragraph 17) which states “The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area” and paragraph 20d which states</p>

		development management policies are reviewed to ensure that they align and can deliver the strategic policies of the GNLP.	that this must include “conservation and enhancement of the natural, built and historic environment”. Paragraph 20 of the draft GNLP strategy makes it clear that it will only update DM policies where necessary to implement the strategy. However, 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.
13413 Crown Point Estate	Comment	<ul style="list-style-type: none"> Given the age of the Norfolk Local Transport Plan and the Norwich Area Transportation Strategy, and that the Norfolk Local Transport Plan and the Transport for Norwich Strategy are currently in early review stages, we suggest they have a reduced influence on the transport priorities of the GNLP. Especially as sustainable transport has become more emphasised. In order to future-proof these priorities it is considered essential that the evidence base relied upon is up to date or that contingencies are ensconced within the GNLP. We anticipate commenting further once these documents are published as part of the wider evidence base. 	
22919 Barratt David Wilson Homes	Object	GNLP states the three districts are working together to produce a single plan but then advises it will only be a partial plan with SNDC producing the other part on its own. It also says the GNLP identifies the sites to meet the needs which it doesn't.	Consider the need for amendments to the introduction and to the

		<p>It also says it will supersede the JCS and the site allocation documents in each of the three districts which it won't in SN.</p> <p>Without sight of the 'South Norfolk Village Clusters Housing Site Allocations' document it is impossible to know whether sufficient sites will be found for the 1,200 new homes assigned to that area / document; there is no evidence to suggest that the figure will not be different. Nor is there any evidence to demonstrate that these sites will represent a sustainable pattern of development or, as required by the NPPF (para.35), an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p>	overall strategy based on the comments.
23068 Orbit Homes	Object	<ul style="list-style-type: none"> • we are concerned with how the Plan itself aligns with the stated position and its lack of alignment with the proposed policies. This in turn means that the purpose of the Plan is not clear. • the GNLP does not plan for sufficient housing to meet the local needs in accordance with the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG). It does not take a long-term view in terms of the growth of the Cambridge-Norwich Tech Corridor, and in policy terms, does little to encourage or stimulate the success of the Corridor. This stance is not aligned with wider strategies and initiatives, and therefore we consider the aim of the plan is undermined. • The preferred sites identified are not the most sustainable when compared to reasonable alternatives and the Plan defers the allocation of sites for 1,200 homes to a future 'Village Clusters' Plan • A11 has recently been dualled and is an important link between Cambridge and Norwich, this has required a substantial investment and growth should maximise and support this via allocating growth at a garden village with a new junction on the A11. • A mobility hub at Wymondham Station has been allocated funds which should reaffirm its position in the settlement hierarchy and its growth potential. Given Wymondham's position in the Tech Corridor and its sustainable transport connections there should be a more comprehensive plan for growth here. 	Consider the need for amendments to the introduction and to the overall strategy based on the comments.

		<ul style="list-style-type: none">• The plan states in needs to look beyond 2038 but also states no new settlements are considered due to the long period for this to be established.• The SN village clusters plan undermines the purpose of the plan by not making clear that a sufficient housing provision is met and that enough land will be brought forward to address objectively assessed needs over plan period. The 1,200 homes allocation is considered significant so shouldn't be covered separately.• the approach of preparing a separate document for just one constituent authority in isolation is not considered a robust approach to plan making and risks making the GNLN ineffective.	
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QUESTION 2

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 2 - Is the overall purpose of this draft plan clear?
TOTAL NUMBER OF REPRESENTATIONS:	24 (23 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	8 Support, 5 Object, 11 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
19804 member of the public	Object	<ul style="list-style-type: none"> • Wortwell doesn't have infrastructure for more houses. • Schools and doctors over subscribed • Will devalue properties in village • we moved from new housing estate as low cost created burglaries, drugs and misbehaviour 	<p>Whether housing growth should be allocated in Wortwell</p> <p>Need for infrastructure to support growth</p>
19901 member of the public	Support	<ul style="list-style-type: none"> • Plan has sustainability embedded in it; in energy consumption, transport and the environment. 	Note support on sustainability issues
20018 Member of the Public	Comment	<ul style="list-style-type: none"> • Purpose is clear for those who have a background in the process but the terminology would be difficult for many lay people. 	Note difficulty re. terminology for general public
20042 Member of the public	Support	<ul style="list-style-type: none"> • fairly clear in spelling out the reason for the plan 	Note support on reasons for the plan
20502	Object	<ul style="list-style-type: none"> • Clear that strategy favours developers' profits over needs of community. 	Note view that:

Marlingford and Colton Parish Council		<ul style="list-style-type: none"> Lip service is given to environmental protection but it is largely ignored – new vehicle movement created by village clusters idea, based as it is on false infrastructure assumptions, is an example of this conflicted strategy 	<p>The strategy favours developers' profits over needs of community.</p> <p>There's conflict in the strategy between environmental protection and additional traffic from village clusters approach</p>
20754 Member of the public	Object	<ul style="list-style-type: none"> looking beyond the end date assumes additional growth needs which would mirror growth of last 20/30 years. National resource assets being lost to infrastructure and development, planning should have more defence against the continued loss of habitat and agricultural resources and provide a stronger requirement for zero carbon development/retrofit – a resource efficient circular economy. 	Note concerns over long term growth statements and resource/habitat losses
20793 Norwich Green Party	Object	<ul style="list-style-type: none"> major conflicts/tensions in overall plan purpose between growth and achieving sustainable development e.g. how will plan contribute to net zero carbon by 2050 or to County Council's environmental policy to achieve carbon neutrality by 2030 and at the same time support road investment programmes? JCS failed to deliver sustainable development e.g. transport's share of carbon has increased, the NDR was delivered but not the bus rapid transit system promised; and inadequate numbers of affordable homes were built. GNLP offers more of the same. 	<p>Note concerns about:</p> <p>plan not contributing to carbon neutrality targets, particularly in relation to road and public transport policy</p> <p>inadequate affordable housing</p>
20960 Easton Parish Council	Comment	<p>Note view that:</p> <ul style="list-style-type: none"> As a parish council we have found the document difficult to navigate. Feel it's not been written in a way to attract high level of public comment. We feel inspector viewing this should not accept its content and have it rewritten so the community can engage with it. <p>Website difficult to navigate and is of poor design to encourage all members of society to engage with it.</p>	
21064	Support	<p>Note view that:</p> <ul style="list-style-type: none"> Notion of integrated 3 council plan is illogical. 	

Saving Swainsthorpe Campaign		<ul style="list-style-type: none"> • Contents of plan implies bias in favour of developers and little if any attention is given to residents, place and the environment with no attempt to consider seriously the carbon footprint of the plan. • Focus on house building rather than overall planning of a sub region. • Housing targets are significantly in excess of what is required and contains reference (p37) of two additional contingency locations. 	
21246 Lanpro Services and Glavenhill Ltd via Stephen Flynn	Comment	<p>Purpose generally set out clearly however;</p> <ul style="list-style-type: none"> • base date and end date should be in introduction. • support para 5, particularly with reference to creating world class jobs in the areas listed– but will this be achieved through the preferred growth strategy – are the housing/employment allocations adequate and well located to achieve the goal? • Agree with para 9 but will it be achieved by the preferred growth strategy, particularly regarding transportation? • Para 12 identifies important strategies and initiatives, suggest further clarification on how plan knits together with and supports these in a meaningful way • Para 13 refers to Greater Norwich City Deal growth requirements being met through GNLP, introduction should explain what this is and what the requirement numbers are otherwise this may be meaningless (particularly for the public). An explanation for how these numbers have been accounted for in the overall housing requirements should be within the document, it is currently unclear. • Support principle of para 22 to look beyond plan end date by setting a strategy that can be sustainable added to in the long term. • No clear reasoning for omission of small sites in SN village clusters in Para 24. ‘More villages’ is not clear, doesn’t justify why more primary schools should decide a separate growth strategy for SN. The Cambridge Norwich Tech corridor runs through SN which is a focus in Para 5. It would make more sense if this was the main consideration for housing locations within SN. A clear justification is needed to understand how an approach of small site dispersal among rural areas and towns is sound. It places doubt on the intent in Para 5 and the delivery of the Vision for Greater Norwich in 2038 set out in Para 108. How can 1200 be relied upon when the sites have yet to be identified and assessed. 	Note detailed comments made on different aspects of the Introduction

		<ul style="list-style-type: none"> It is premature to ask for comments when 15% of new allocations are missing. These sites form a fundamental part of the overall strategy and without identification of these, the strategy is not sound. 	
21274 Member of the public	Comment	<p>Note that:</p> <ul style="list-style-type: none"> Unable to find initiatives which will achieve objective of protecting our environment, habitats and creating new green spaces. Full dualling of A47 directly opposes the aim. Most of the remaining major habitat sites in Norfolk will soon be flooded according to map 4 in section 2, where will these species be relocated? 	
21421 Mid Suffolk District Council	Support	Support GNLP as written and will continue to engage with SNC through the duty to co-operate and on any matters arising from preparation of Diss and District Neighbourhood Plan.	Note support and intention to engage further
21582 GP Planning Ltd	Support	<p>Note view that:</p> <ul style="list-style-type: none"> Overall purpose is clear Retention of existing adopted Growth Triangle Area Action Plan and allocations therein, particularly GT16, is supported. However, the introduction should make the GNLP's focus on additional growth to meet housing delivery and other targets clearer, and that the contribution of the allocated sites forms a baseline only and won't be re-examined. If the independent inspector wishes to review overall housing numbers, the landowners and promoters of GT16 would wish to provide the appropriate representation. 	
21708 RSPB	Object	<p>Note view that:</p> <ul style="list-style-type: none"> Integration between the planning authorities and local plans should be clear beyond housing e.g. increased development in one plan area may lead to increased recreational pressure within another. Examples might include; electric vehicle charging points at start/end of journeys combined with information to promote enjoyable experiences at the end point. 	
21711 Brown and Co	Comment	Note view that:	

		<ul style="list-style-type: none"> • Purpose is clear however, concerned approach of growth distribution, carrying forward 82% of sites and new allocations support this purpose. • Proposed flexibility for climate change and move to post-carbon society is welcomed but carrying forward allocations and concentration of growth in urban areas is considered to be misaligned with goal of NCC to be carbon neutral by 2030 and national target of 2050. • The strategy for growth and associated allocations aren't forward thinking enough to truly deliver sustainable, resilient and attractive communities. • Carried forward allocation weren't delivered in the previous planning period. These should be scrutinised with more evidence from landowners/developers demonstrating ability to deliver within plan period. Without this, delivery of strategy is at risk through opportunistic large-scale development undermining place-making, sustainability and climate resilience. 	
21931 UEA estates and buildings	Support	<ul style="list-style-type: none"> • yes (overall purpose is clear) 	Note support from UEA
22245 Suffolk County Council	Comment	<ul style="list-style-type: none"> • clear, logical and contemporary, specific but addresses flexibility. • Opportunities and challenges presented by an aging population could be better embedded into the objectives relating to communities and economy 	Consider whether there should be a greater focus on the ageing population
22266 Barton Willmore	Comment	<ul style="list-style-type: none"> • (Copied from Q1) • Role of A11 and Cambridge Norwich Tech Corridor needs to be better reflected in wider growth strategy. • Sustainability agenda highlights need for growth in sustainable locations that have immediate needs served from a local community. • Possible that less affluent in society will be more affected by sustainability targets due to increased costs which places greater need for development to be planned of sufficient size to support wider range of local services and which will serve needs of local population and minimise small journey travel. • Do not support proposal to reserve 1,200 homes to villages as part of separate plan pre-judges the number before a full assessment of where housing can most sustainably be located. Directing small scale growth in villages as advocated is at odds with principles of sustainable development. 	See response to same text from Barton Willmore in question 1

		<ul style="list-style-type: none"> • Due to village growth being small scale, residents will rely more on cars as their will not be scope for additional growth in villages where developments occur. As such all site allocations should be in one plan allowing growth to be directed to settlements that have services and transport connections to support it. • rolling forward allocations suggest authorities have not assessed whether they are currently delivering growth. There is a significant shortfall against planned growth in the previous Joint Plan making the affordability of housing even less within the reach of the population as highlighted in the SHMA which shows the salary multiple in South Norfolk has become worse than the national average. It is essential that the plan identifies the most sustainable strategy for achieving the growth required rather than relying on previous allocations. 	
22504 Broadland Green party	Comment	<ul style="list-style-type: none"> • Insufficient emphasis has been put on objective established within the NPPF which describes need to help sustainable development. • This means that the planning system has three overarching interdependent objectives: economic, social and environmental. • We are therefore reviewing the plan against these three objectives “to secure net gains across each of the different objectives”. 	Note intent to review plan against the 3 NPPF sustainability objectives
22527 Historic England	Support	<p>Copied from Q1</p> <ul style="list-style-type: none"> • Welcome reference to heritage and historic environment. • Concerned that not proposing to update Development Management policies at present, would be helpful to read plan as a whole. • Para20 states Development Management policies will not be amended except in very specific circumstances. • Unclear what the statutory relationship between these documents will be. If GNLP is strategic level policies it’s unclear how existing development management policies will be able to deliver these objectives and vision given they already exist. This raises fundamental question regarding the ability of the overall plan to provide a sound, evidence based positive strategy for the conservation and enhancement of the historic environment given that the 	See response to same text from Historic England in question 1

		<p>strategic part of the plan will be retrospectively formulated in isolation of the development management parts of the plan.</p> <ul style="list-style-type: none"> • The approach taken means that there will be a period where the development management policies will not synchronise with the new strategic policies. There is concern that this fundamentally undermines a truly integrated plan-led approach to long term development. • We are concerned that the approach taken will result in any plan being unsound as it will in effect be incomplete and the component parts will not reflect each other. It is for these reasons that even in the event the GNLP is sound itself; it is very unlikely that we will be able to confirm that the entire plan is sound. At this stage we must again advise that the development management policies are reviewed to ensure that they align and can deliver the strategic policies of the GNLP. 	
22871 & 23011 Bidwells (one for GNLP0125, one for 0520)	22871 Comment 23011 Support	<ul style="list-style-type: none"> • Yes (overall purpose is clear) 	Note support in assessing need for any changes to the Introduction
23097 Salhouse Parish Council	Comment	<ul style="list-style-type: none"> • Does the plan consider any post-Brexit employment changes? 	Assess how to address post-Brexit (and Covid 19) employment changes through the plan through collecting new evidence for policy 1 (the strategy) and policy 6 (the economy).

QUESTION 3

STRATEGY QUESTION:	Question 3 - Please comment on or highlight any inaccuracies within the spatial profile?
SETTLEMENT/ SITE REFERENCE:	
TOTAL NUMBER OF REPRESENTATIONS:	22 (20 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	2 Support, 7 Object, 13 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
19902 public	Comment	transport link information is wildly optimistic; <ul style="list-style-type: none"> • rail network to midlands is poorly maintained • line to London is slow and unreliable • Cycle network is patchwork, poorly maintained and often shares pavement space with pedestrians. • A47 is generally slower than A11. 	Note comments on transport issues.
20043 public	Support	no comment	Note support
20431 public	Object	<ul style="list-style-type: none"> • Para38 (health & Wellbeing) ignores issues of mental health services in area which result in high suicide levels. • Poor emotional support for those that can't afford help. • Dr's surgeries over subscribed 	Note comments on mental health and GP surgery issues.
20462 public	Comment	In the Cambridge/Norwich tech corridor map cutaway, Cambridge seems to be placed where Huntingdon is	Noted
20666 CPRE	Object/ comment	<ul style="list-style-type: none"> • Insist on use of 2016 National Household Projections. 	Note view that the GNLP should use the more up to

<p>+ 20740/21465/21843 Hempnall PC (3 times) + 21816 Barford PC + 22015 Mulbarton PC +22655 Saxlingham Nethergate PC + 23098 Salhouse PC</p>		<ul style="list-style-type: none"> • If most recent ONS stats used current commitments would be sufficient to cover housing needs. 	<p>date ONS 2016 household projections (rather than the 2014 projections required by the standard methodology) negating the need for more allocations.</p>
<p>20756 Public</p>	<p>comment</p>	<ul style="list-style-type: none"> • Para 33 (populations growth) – unclear how projected growth of 46,000 required additional 44,500 homes and 33,000 jobs. • Para 65 (historically poor infrastructure leading to poor growth) is this proven or anecdotal? • Para99 Add Wensum and Tud rivers • Paras 104 & 106 – why build over water stressed quality land? 	<p>Note specific comments</p>
<p>20987 Public</p>	<p>Comment</p>	<ul style="list-style-type: none"> • Railway links to other Public transport services need to be co-ordinated e.g. bus to Wymondham station, parking facility for the station • Health provisions to be provided before development, surgeries are overwhelmed and waiting until after development does not inspire confidence • Cycle ways should be provided at development stage, not just white lines added to pedestrian footways 	<p>Note comments public transport and health facilities</p>
<p>21279 public</p>	<p>Comment</p>	<ul style="list-style-type: none"> • national decline in birth rate means population growth estimate is potentially inaccurate, simplistic and lacking evidence. • Pie chart shows identical percentage of young people in 2018 & 2038 but the observation is that the trend for higher than average young populations is set to continue. • Unsubstantiated and inaccurate information 	<p>Note comments taking account of: As referenced in the footnotes of the Reg. 18 draft plan, the population projection graph following</p>

			<p>paragraph 33 and the pie charts projecting population by age groups following paragraph 34 show population data sourced from the 2016 ONS projections. This was the best available data source at the time of writing.</p> <p>The projected higher than national average numbers of young people in the population in 2038 (paragraph 36) refers to Norwich rather than Greater Norwich. It is correctly attributed to trends based on the city's high student population.</p>
21353 Public (Active Norfolk?)	Comment	<p>Note comments on</p> <ul style="list-style-type: none"> • Para 34 (increased older population links to residential care) – emphasis should be on broader health system, not just tertiary care. Primary and Secondary care capacity will continue to be pressured, therefore a healthy living environment is key to prevention • Para39-41 puts disproportionate emphasis on crime prevention – suggest not mentioning increased impact on health system of aging population or link to HWB Priorities; <ol style="list-style-type: none"> 1. Single sustainable system – consider environmental contributions to welfare 2. Prioritising prevention – promote physical activity – link to priority areas for prevention in HWB plan 	

		<p>3. Tackling inequalities in communities – Better living conditions, improved green infrastructure and community space accessibility are important to reduce inequality such as in parts of Norwich.</p> <p>4. Integrating ways of working – increased lifespan increases demand on health and social care services, linking GNLP to Norfolk’s Integrated Care System and Promoting Independent Programme is important for this.</p> <ul style="list-style-type: none"> • Recommend hierarchy of sustainable transport image inserted into para 66 to reinforce its importance (Walking & wheeling, cycling, public transport, taxis and shared transport, private car) • No reference to walking connectivity as a policy priority (Active Design Principle). Should be included with reference to priority to access green space/community assets by walking. <p>Para 101-102 – improve existing green spaces, particularly country & urban parks, is important to promote active uses and limit impact of excessive use of sensitive ecological areas as population increases</p>
21712 Brown & Co	Support	<p>Note comments on:</p> <ul style="list-style-type: none"> • believe special profile to be accurate however there is a failure to recognise influence Greater Norwich has on whole County, though it is considered that this lessens as distance increases. • Need to consider impacts on ability to plan and deliver growth which may arise from outside of Greater Norwich area.
21976 South Norfolk Green Party	Object	<p>Note comments on:</p> <ol style="list-style-type: none"> 1. Mention of male life expectancy in most deprived areas of Norwich as being 10.9 years lower than least deprived – how is this being addressed? 2. Should use most recent ONS stats used - current commitments would be shown to be sufficient. 3. Welcome involvement in Government’s Transforming Cities programme, look forward to Transport for Norwich review. 4. Provision of sustainable transport in rural areas is vague. The connecting Norfolk initiative is mentioned but needs to be aligned with new climate change goals. Target percentage for rural population with access to public transport dropped by 10% since 2011 and no actual figures seem to be available. 5. The (not well advertised) liftshare initiative is welcomed. 6. An aim of GNLP should be to locate housing close to jobs, locating houses in rural areas only adds to carbon footprint and congestions which affects air and wellbeing of residents. 7. Welcome statement that GNLP policies need to contribute to targets to reduce emissions and plan for post carbon economy.

22120 MDPC Town Planning	object	Note view that Horsford has 9th largest population in the area and should have a greater number of housing allocations.	
22268 Barton Willmore	Comment	<p>Note view that</p> <ul style="list-style-type: none"> • Table 1 shows Wymondham to be larger than other centres making is an obvious location for growth. • Para34 highlights high student and aging population. P16 shows 81% of housing need is for houses which won't be met with flats in the city. Building larger housing in areas with good local facilities is the need and Wymondham meets this need. • Para44 87% housing has been delivered is inaccurate. 22,506 target for 2008/09-2018/19 – 18,221 delivered (4,283 shortfall) which is circa 80% delivery. Worse in Norwich Policy Area (20,163 target, 13,994 delivered – 69% delivery) • reference to 133% housing target being delivered 2015/16 & 2017/18 is misleading given shortfall of 4,283 homes. Delivery of growth to 2038 should be fully assessed and needs a review of successful delivery locations vs unsuccessful, deliver growth based on this (e.g. Wymondham) • Comparing to the country's average performance is irrelevant and the under-delivery should be highlighted here as it impacts affordable housing which is a local issue. Provides justification for 20% buffer (as supported by HBF) rather than 9% 	
22359 Norwich Green Party	Comment	<p>Note view that</p> <ul style="list-style-type: none"> • Economy; emphasise importance of low/zero carbon economy • Infrastructure; concerns policy driven by relatively poor strategic infrastructure links. There is a lot of evidence against road building. Education and skill delivery more important which GN historically underperforms in. Lack of integration between land use planning and transport – dispersed development; strategic sites in peripheral areas lacking public transport. Lack of consideration for reasonable alternatives. • Renewable energy – Insufficiently pro-active & ambitious • Delivery – Mustn't be driven by housing/job targets only, climate should be integral. Radical carbon reductions needed to achieve net zero carbon by 2050. Plan actions don't reflect climate emergency (Para81). Plan doesn't deliver sustainable development as defined by Brundtland Report 'Our Common Future' 	
22505 Broadland Green Party	Comment	<ul style="list-style-type: none"> • national decline in birth rate means population growth estimate is potentially inaccurate, simplistic and lacking evidence. 	Note comments taking account of:

		<ul style="list-style-type: none"> • Pie chart shows identical percentage of young people in 2018 & 2038 but the observation is that the trend for higher than average young populations is set to continue. • Unsubstantiated and inaccurate information • Para35 (declining birth rate) is supported by ON latest report (August 2019) – birth rate lowest ever recorded where measured as proportion of total population. 	<p>As referenced in the footnotes of the Reg. 18 draft plan, the population projection graph following paragraph 33 and the pie charts projecting population by age groups following paragraph 34 show population data sourced from the 2016 ONS projections. This was the best available data source at the time of writing.</p> <p>The projected higher than national average numbers of young people in the population in 2038 (paragraph 36) refers to Norwich rather than Greater Norwich. It is correctly attributed to trends based on the city's high student population.</p>
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QUESTION 4

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 4: - Are there any topics which have not been covered that you believe should have been?
TOTAL NUMBER OF REPRESENTATIONS:	9
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 2 Object, 7 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
20044 public	Comment	Population by each of the defined areas would be good to see, for instance Sprowston is identified as a town which is importance in relation to infrastructure or lack thereof, be it from a health, transport or social viewpoint.	Potential inclusion of more population information
20430 public	Object	<ul style="list-style-type: none"> • Villages outside of Norwich struggle with insufficient, unreliable bus services meaning car or taxi is needed which costs and leads to some feeling isolated. • No reference to community transport solutions, not low carbon options e.g. electric buses 	Community transport
20758 public	Comment	Para 85 " should be "policies will contribute" and take the opportunity to set standards for any new development to be carbon neutral and provide bio-diversity net gain.	Specific wording (para. 86 printed version)
21280 public	Comment	Note view that growth will not help achieve happiness and wellbeing of communities now and in the future	Consider more references in the spatial profile to happiness and wellbeing and the broad range of contributory factors to it e.g. through people being well-

			housed, having opportunities for active lifestyles, environmental enhancements.
22269 Barton Willmore	Comment	<p>Copied from Q3</p> <ul style="list-style-type: none"> • Table 1 shows Wymondham to be larger than other centres making it an obvious location for growth. • Para34 highlights high student and aging population. P16 shows 81% of housing need is for houses which won't be met with flats in the city. Building larger housing in areas with good local facilities is the need and Wymondham meets this need. • Para44 87% housing has been delivered is inaccurate. 22,506 target for 2008/09-2018/19 – 18,221 delivered (4,283 shortfall) which is circa 80% delivery. Worse in Norwich Policy Area (20,163 target, 13,994 delivered – 69% delivery) • reference to 133% housing target being delivered 2015/16 & 2017/18 is misleading given shortfall of 4,283 homes. Delivery of growth to 2038 should be fully assessed and needs a review of successful delivery locations vs unsuccessful, deliver growth based on this (e.g. Wymondham) • Comparing to the country's average performance is irrelevant and the under-delivery should be highlighted here as it impacts affordable housing which is a local issue. Provides justification for 20% buffer rather than 9% as supported by HBF 	See response to same Barton Willmore comments in question 1
22381 Norwich Green Party	Comment	<p>Note comments:</p> <ul style="list-style-type: none"> • Para81 essential to adapt to climate change and build resilience. Flood risk from rising sea/river levels have flood risk implications in greater Norwich. • Need to reference biodiversity emergency and nature-depleted state of UK. There is need to create new wildlife habitats as well as protect and enhance existing ones; substantially increase tree coverage and hedgerows in rural and urban areas; protect urban green open spaces from development e.g. sports grounds and not replace grass with hard surfaces. • Historic assets: (92) add 'medieval street pattern' as having shaped historic development of Norwich and line of city wall - Norfolk Structure Plans referred to 	Consider specific suggestions for adding further detail to spatial profile on flood risk, biodiversity and historic assets

		medieval street pattern which gave added protection to Norwich historic city centre.	
22506 Broadland Green Party	Comment	<p>Note comments</p> <ul style="list-style-type: none"> • need to cover happiness and wellbeing of community now and in the future. • Norfolk Association of Local Councils has a wellbeing strategy (with strong support from CPRE) which could be referenced in the plan with issues including; <ul style="list-style-type: none"> ○ low carbon economy, towards net zero ○ trees, hedges, wildlife ○ neighbourliness, inclusive communities and inter-generational issues ○ water, flooding and irrigation ○ built environment, housing & planning ○ Cars, car paring, park and rise, lift sharing and public transport ○ services (doctors, dentists etc) ○ loneliness ○ shopping ○ new technologies and AI ○ Employment 	Consider specific suggestions for adding further detail to the spatial profile on happiness and wellbeing
22754 Public	Object	<p>Note analysis of the GNGB's Annual Monitoring Report;</p> <ul style="list-style-type: none"> • Consultation fails to recognise other factors which have contributed to decline of retail rankings of Norwich in last 10 years; The city is being isolated due to retail and employers being moved to the edges. • CO2 emissions from transport per capita haven't decreased for the three LPAs since 2011. The NDR will increase emissions further. A modal shift in transport patterns is not working and I question whether this is a real ambition or conforming to government policy. • market towns and key centres of employment have had declines in accessibility year on year. Are employment centres in the right location? • general and affordable housing completions are green on RAG but until 2018/19 overall housing has been short of target. 	Assess whether the spatial profile and/or policy approaches need amending in the light of the AMR analysis

		<ul style="list-style-type: none"> • Major losses in permitted employment floor space since 2011, particularly in Norwich. The increase in employment suggests more working from home which is ignored in the plan. • “Percentage of permitted town centre uses in defined centres and strategic growth locations” -what is the annual measurement? Figures show this to be failing. • “Objective 7: to enhance transport provision to meet the needs of existing and future populations while reducing the need to travel” is similarly failing. 	
22842 Crown Point Estate via Pegasus Group	Comment	<p>Note comments:</p> <ul style="list-style-type: none"> • Consider GNLP has not addressed the low-tech sector. Rural businesses are acknowledged as important but does not seem to translate into policy. • Para78 discusses transportation modal shift with 375,000 increase in Norwich bus journeys. Need to build on this with a further improvement of the Park and Ride network to improve capacity and meet an increasing demand as growth strategy comes to fruition. • Draft Plan constrained by lack of detail on Transport for Norwich review which includes the P&R network. The Loddon Road P&R site, located on the only major transport route into Norwich without P&R facilities, is a solution. 	<p>Assess whether the spatial profile and/or policy approaches need amending to reflect comments on the low tech sector.</p> <p>Consider views on and P + R through Transport for Norwich</p>

QUESTION 5

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 5 - Is there anything you feel needs further explanation, clarification or reference?
TOTAL NUMBER OF REPRESENTATIONS:	22 (21 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 5 Object, 16 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
19903 public	Comment	Note comment that this is not a strategy, just a report with hopes for the future - there's no details	The spatial profile section is introduced in para 29. as outlining “ the main social, economic and environmental issues In Greater Norwich which provide the context for development in the local plan”. Consider whether this wording should be amended to provide greater clarity that the strategy is in the policies in section 5 (as set out in the Contents section).
20045 public	Support	Note comments: <ul style="list-style-type: none"> • Road network now supports increasing routes across communities to the north of city from UEA/hospital to Broadland business park • clearer map of villages in Norwich growth zone • Will public transport options increase across villages as well as from villages to city? 	Consider: <ul style="list-style-type: none"> • Transport comments through Transport for Norwich • Need for clearer mapping of the Strategic Growth Area

20592 Climate Friendly Policy and Planning	Object	<p>Note comments:</p> <ul style="list-style-type: none"> • Para84 has per capita CO2 footprints but SA 2.11 uses population-wide footprint. Better to use just one – population-wide footprint is most appropriate as related to overall CO2 budget. • Climate change statements sound promising but lack any demonstration on how to deliver. • Set a GNLP carbon budget aligned to national and international obligations, with a measurable target for success (Stroud Draft Plan is a good example for this) • Need for unified target across area 	<p>Consider:</p> <ul style="list-style-type: none"> • Use of per capita/population wide footprint CO2 data in plan + SA • Providing greater clarity on delivery of climate change statement • Setting local measurable CO2 targets
20759 Public	Object	<p>Note questions:</p> <ul style="list-style-type: none"> • Is there a plan if sea/coastal defences aren't maintained and there is a breach which could take out large areas of the county? • Para88 what warning in place for residents to relocate cars of prepare for flood in Norwich? 	<p>Maintenance of coastal defences is covered by Shoreline Management Plans led by the Environment Agency (EA) rather than through local plans. The SMP most relevant to the Greater Norwich area, which does not itself have a shoreline, is the Kelling Hard to Lowestoft Ness SMP, available here. Flood warnings are also provided by the EA.</p>
20760 public (same as 20759)	Comment	<p>Note statements:</p> <ul style="list-style-type: none"> • Public transport needs to be more affordable, reliable and of better quality for a modal shift to occur. • Para 71 Wensum Link has no funding or planning and should not be assumed in the GNLP • Para75 cycle network maps/boards needed in the city. Contra flow lanes constructed without protection (E.g. Duke Street) 	<p>Consider:</p> <p>comments on public transport and cycling infrastructure and information through Transport for Norwich;</p> <p>how the NWL proposals will be addressed through the local plan</p>
21068	Object	<ul style="list-style-type: none"> • no clear strategy; wish list rather than statement of emerging priorities and supporting fund streams 	<p>The spatial profile section is introduced in para 29. as outlining “ the main social, economic and</p>

Saving Swainsthorpe Campaign			<p>environmental issues In Greater Norwich which provide the context for development in the local plan”. Consider whether this wording should be amended to provide greater clarity that the strategy is in the policies in section 5 (as set out in the Contents section).</p> <p>This is a high level planning policy strategy for guiding more detailed subsequent plans and planning application decisions. Appendix 1 provides the infrastructure requirements to support the plan. It will be supported by Implementation Plans (e.g. the current GNIP) providing details of implementation measures + funding streams which will be reviewed annually. Consider how this can be made clearer through the text of the plan</p>
21253 Lanpro Services + 21375 Glavenhill Ltd	Comment	<p>Note view that:</p> <ul style="list-style-type: none"> • Para 43 actual number of required homes need to be specified – percentages provided but not total numbers. • Para 156 existing commitments provide 82% of housing growth to 2038. Could be confusing for reader with the 87% delivery figure against JCS targets. • delivery percentages 2015/16 & 17/18 – do these relate to combined annual requirement for these years? • Para 44 suggest paragraph removed, 5 year supply measured against SHMA and not JCS, meaning it can only be opinion that there was 5 year supply in 2018. • Para 57 What is the City Deal and what are the council commitments in terms of extra housing and employment over and above the JCS targets? 	<p>Consider amendments to clarify use of percentages noting that para. 43 covers past delivery and percentages provide an easy means of assessing this. The standard methodology for assessing current need takes account of previous shortfalls in delivery.</p> <p>Consider whether any amendments to the text are required in relation to comments on the 5 year land supply and the City Deal.</p>

21282 Public	Comment	<p>Note comments and questions:</p> <p>How is 28% affordable housing to be met? More homes won't make housing more affordable, it will only flood the market leaving householders in negative equity and creating social instability.</p>	<p>Consider whether additional text is required in the spatial portrait or in the text supporting policy 5 on Homes to explain requirement for affordable housing with any major development as part of the granting of planning permission.</p>
21714 RSPB	Comment	<p>Note comments</p> <ul style="list-style-type: none"> • Para98 - clarify how to maintain water quality, and how this will prevent damage to protected sites. • Para106&107 need to be qualified to mention possible conflict between maintaining river flows and ensuring no adverse impact on protected sites and species, and the need as a public water supply. • Para105 needs to mention poor soil management on riparian habitats. Peat and chalk soils in Wensum valley and carbon capture should be mentioned. • para107 needs clarification – what mechanisms will overcome the serious water stress • Para98 details needed on how development will avoid impacting designated sites. • Para101 more details needed for how GI is being improved. Also 101 contradicts HRA – biodiversity buffer zones to control impact vs no impacts. • HRA should describe impact in terms of 'likely significant effect'. • RSPB has shown combinations of impact sources leads to damaging events on sites and species –should include this 'in combination' aspect in HRA 	<p>Consider how to address these detailed comments taking account of:</p> <p>The role of the spatial profile in identifying baseline issues affecting planning for Greater Norwich rather than providing the strategic planning responses. These planning responses are set out in the strategy section of the plan (section 5);</p> <p>Accordingly, whether the text and policies in section 5 (most notably policy 3 on the environment) need amending in the light of the comments, particularly relating to HRA issues.</p>

		<ul style="list-style-type: none"> • mitigation needed to cover cost of infrastructure deterioration in popular areas and enhance facilities, as well as promote sustainable access. • Para104 Details needed on mechanisms to be used to protect landscapes • Para107 does not describe need to extract water from the source. Suggest protection of water and its quality go beyond new water efficient buildings. Lessons from new builds should be conveyed and implemented across existing infrastructure to help change failing water framework directive status of rivers and water bodies in the broads. • Increased growth will compound existing issues around water provision, it's quality, and the nitrogen and ammonium deposition. • Figure 4 does not show marine protected areas off Norfolk Coast. The Outer Thames Estuary SPA and Greater Wash SPA should be identified as a minimum. Relevant for in-combination assessments in HRA as features of these sites that breed on beaches could be impacted by increased recreational pressure from new developments in Greater Norwich. 	
21715 Brown & Co	Comment	<p>Note view that:</p> <ul style="list-style-type: none"> • All parts of GNLP should ensure the protection and enhancement of the special characteristics locally and regionally. • To combat climate change there is a need to protect sites, valued landscapes and biodiversity • Consider spatial profile elements collectively, for strategy and sites to enable real change in Greater Norwich area. 	<p>Assess:</p> <p>whether there is a need to amend the spatial profile and/or text and policies in the strategy section and Sites Plan to place a greater focus on special local characteristics, protected sites, valued landscapes and biodiversity</p>

			whether there is a need to clarify that the spatial portrait applies to both the strategy and the sites documents.
21829 Natural England	Comment	<p>Note comments</p> <ul style="list-style-type: none"> • Improve and expand information in Natural Environment section by recognising and including biodiversity loss, climate change, habitat fragmentation, pollution etc and how the plan affects these. • (97) Natura 2000 sites should be replaced with European Sites due to leaving the EU. Would be useful to explain NPPF refers to these as habitats sites. • Abbreviations on legend of Map 4 aren't explained • Map(s) needed to illustrate other natural environment assets found within or adjacent to GNLP area. • (98) expand and clarify impact of growth on water & its quality separately from recreational disturbance impacts. Recreational disturbance affects not just international designated sites, but a wide range of important wildlife assets including CWSS • (101) Clear statement needed that existing GI network needs protecting from further loss and severance as well as new GI creation. • mention GI's vital role in; supporting biodiversity, combating climate change, reducing pollution, helping to create attractive homes & workplaces, enhancing landscapes, reducing flood risks and aiding wellbeing. • Protecting and delivering GI is key to GNLP's objectives and growth cannot be sustainable without this. <p>The plan should promote delivery of strategic GI network that is resilient to development scale, capable of protecting species and supporting habitats and delivering wider range of environmental services to meet development needs.</p>	
22033 East Suffolk Council	Comment	<p>Note comments:</p> <ul style="list-style-type: none"> • Para70 pleased A146 has been recognised as a key link in the Government's Major Road Network. The Preferred Option Traffic Forecasting Report (Mar 2018) notes the Norwich Road/Loddon Road and A146 Norwich Road/A143 Yarmouth Road junctions will reach close to 100% capacity by 2036. They are within South Norfolk/Greater Norwich area, addressing traffic issues here is likely to become a necessity. • The Barnby Bends bypass Major Route Network improvement proposal has progress with funding to prepare and outline business case. These improvements would benefit the A146 route and A143 link. • Para73 Norwich rail service provides direct access to Lowestoft, please update text to include Lowestoft as a destination. 	
22180	Comment	Note comments on:	

<p>Environment Agency</p>		<p style="text-align: center;">Emissions and climate change (p23)</p> <ul style="list-style-type: none"> • Para86 - expand to state opportunities for carbon sequestration through environmental habitat improvements should be sought on-site and offsite through carbon offsetting or biodiversity net gain. Outlining carbon sequestration measures as well as strategic planning will ensure greater resilience to temperature and rainfall increases. Policy should be underpinned by NLLP compulsory net gain. <p style="text-align: center;">Flood Risk (p24)</p> <ul style="list-style-type: none"> • Map 3 (flood zones) should include climate change enhanced flood outlines (shown in Greater Norwich 2017 SFRA) as the revised NPPF requires planning applications to include an FRA if they are in Future Flood Zones. • Title of Map 3 to be updated to 'fluvial and tidal flood zones' & Key to be corrected from Flood zone 3- "1 in 100" to "1 in 200" (Annual probability of 0.5%) • Recommend Flood risk policies include requirements of a FRA and define what is safe in different situations to provide more clarity than is within the PPG – should include information on the following; Sequential test, Exception test, Sequential approach (higher vulnerabilities on lowest risk parts of the site), Safety requirements for actual and residual risk for different development types (floor levels, Resistant/resilient construction, access egress, flood emergency plans), Offsite flood risk (compensatory storage). • some details of FRA are within SFRA but need to be echoed or expanded within flood risk policy, or refer to SFRA in policy. Particularly the responsibility of LPA to determine when Emergency Flood Plan can ensure the safety of development and when dry floors and/or safe access needed to be safe in a flood. Stipulating these in the plan for different development types at residual risk of flooding in a breach/actual risk of flooding would be advantageous. • Require new vulnerable developments to have dry floors in the actual risk design fluvial 1%/tidal 0.5% annual probability flood event including climate change, and we require all development types to have refuge above the actual risk and residual risk 0.1% annual probability flood event including climate change. • We do not have minimum floor level requirements for less vulnerable development at actual or residual risk, or more vulnerable development at residual risk, instead they are allowed to be managed with Flood Response Plans and flood resistant/resilient construction, to the satisfaction of the LPA and their Emergency Planners. Would be good for Plan to include these details in the flood risk policy. <p style="text-align: center;">Ecology</p>
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		<ul style="list-style-type: none"> • paras 87 - 91 (flood risk), we would like to see more natural functioning of the water environment, including natural flood management measures from slowing the flow and retaining water upstream to reconnecting floodplains in the lower reaches of rivers. This will help to restore natural processes and contribute to improving the water environment under the Water Framework Directive. • As previously advised, all new developments should implement appropriate SuDS. We would like to see close to 100% surface water retention in all new developments to help protect the water environment. • SuDS provision will need to be included as part of the green infrastructure planning; <ul style="list-style-type: none"> • Flood attenuation – helping to preventing surface water flooding, and flash flooding in the locality. • Groundwater recharge – Storing surface water run-off and allowing it to be released slowly will help water to percolate back in to underground aquifers. • Filtering Pollutants, allowing sediments to settle. • Ecological benefits through creation of ponds, swales wetland areas and tree planting as part of SUDs schemes to create new habitat. Where land was previously industrial or agricultural, bring a quantifiable increase in ecological diversity. Features can also enhance the appearance and appeal of the built environment and have amenity value. • A reduction in pressure on local sewerage infrastructure which may already be at capacity. • Provide a source of water for urban activities such as gardening and bring benefits for recreation, education and wellbeing. • www.susdrain.org/delivering-suds/using-suds/suds-principles/suds-principals • Using surface water as a resource is likely to be important as pressures on water resources increase in the future. Capturing and using rainfall within the urban environment can provide environmental benefits as well as increasing amenity value <p style="text-align: center;">Environmental Assets (p26)</p> <ul style="list-style-type: none"> • Para97 needs amending as Natura2000 are European not international protected sites • Para100 needs rewording as no statutory protection – e.g. “sites identified as of local conservation importance”. • section could include statements regarding natural capital, GI and natural functioning ecosystems.
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		<ul style="list-style-type: none"> • Specific section for water environment would be beneficial to ensure all issues covered – link plan to Anglian River Basin Management Plan and state developments carry out Water Framework Directive compliance assessments following guidance in Planning Inspectorates advice note 18 and that developments cause no deterioration in WFD status of any element. Plan must explain ‘no deterioration’ objective. should also reference any significant water management issue which is frequently cited as a reason for not achieving good if it is linked to a development. • Should also refer to Catchment Based Approach and Broadland Catchment Partnership. The Broadland Catchment Plan could provide opportunities for mitigation and net gain through partnership working. <p style="text-align: center;">Water (p29)</p> <ul style="list-style-type: none"> • Water stress is impacting on chalk streams and other water dependent habitats in the Greater Norwich area. • Water Quality and protecting the local water environment must be referenced in this section. • Plan needs to acknowledge growth and development will put pressure on the water environment, especially in respect to meeting the tight environmental legislative targets set to protect bodies of water such as WFD and Habitats Directive, discuss this in the "water" section and highlight the risks posed to the water environment which primarily come from increased discharge volumes from wastewater discharges (sewage works/Water Recycling Centres) which will increase from development within the district. • The Local Plan is an essential instrument to ensure that additional foul drainage arising from new development does not put local rivers (and existing properties) at risk of pollution and/or flooding by sewage and/or wastewater. Essential that this section acknowledges that most of River Wensum and two of its tributaries are a designated SAC and therefore has more stringent conservation (including specific water) targets. <p>The importance of ensuring this protected site is not impacted by growth and development should be highlighted.</p>
22270 Barton Willmore	Comment	<p>Copied from Q3 & Q4</p> <ul style="list-style-type: none"> • Table 1 shows Wymondham to be larger than other centres making is an obvious location for growth. • Para34 highlights high student and aging population. P16 shows 81% of housing need is for houses which won't be met with flats in the city. Building larger housing in areas with good local facilities is the need and Wymondham meets this need. • Para44 87% housing has been delivered is inaccurate. 22,506 target for 2008/09-2018/19 – 18,221 delivered (4,283 shortfall) which is circa 80% delivery. Worse in Norwich Policy Area (20,163 target, 13,994 delivered – 69% delivery)

		<ul style="list-style-type: none"> reference to 133% housing target being delivered 2015/16 & 2017/18 is misleading given shortfall of 4,283 homes. Delivery of growth to 2038 should be fully assessed and needs a review of successful delivery locations vs unsuccessful, deliver growth based on this (e.g. Wymondham) Comparing to the country's average performance is irrelevant and the under-delivery should be highlighted here as it impacts affordable housing which is a local issue. Provides justification for 20% buffer rather than 9% as supported by HBF
22382 Norwich Green Party	Comment	<p>Note comments</p> <ul style="list-style-type: none"> exclude delivery as factor to weigh against objectives in interim sustainability appraisal, it's not an objective in SA and should not affect policies on sustainability grounds. Para83 exclude consumption, production, aviation, shipping so reductions necessary is understated. Para84 Explain implications of drier summers/wetter winters for region and policy making- refer to sea & river levels and implications for Norwich Area.
22483 Highways England	Comment	<p>Note comments:</p> <p>Useful if Map 2 (Greater Norwich main transport links) highlighted the Trunk Road and Major Road networks, together with the major scheme proposals which are programmed for delivery.</p>
22507 Broadland Green Party	Comment	<p>Note views and questions:</p> <ul style="list-style-type: none"> How is 28% affordable housing to be met? More homes won't make housing more affordable, it will only flood the market leaving householders in negative equity and creating social instability. Workable schemes needed to fund low carbon social housing Rail Network –more reliable & frequent services needed to promote public transport over personal transport. Norwich Airport – growth is supported in the plan but goes against low carbon economy aims. Cycle Network – focus on city within the plan but little elsewhere in Greater Norwich. Rural Transport – Little reference to rural bus routes. Digital Infrastructure –phone networks and broadband still lacking in some areas, needs a greater priority. Emissions and Climate change – Para82 & 84 further back up the inconsistency of expanding the airport and road networks. Renewable energy – more emphasis needed on community energy schemes; smart grids, retrofit insulation, on-site renewable energy production and energy balancing/storage.

<p>22529 Historic England</p>	<p>Object</p>	<p>Note comments:</p> <ul style="list-style-type: none"> • Para 93-96 – more detail about heritage in area; what is unique, needs protecting/conserving/enhancing, is at risk, landscape characterisation? • Para 93 – change “historic assets” to “heritage assets”. • Para95 – Use term registered parks & gardens • Para96 – use “scheduled monuments” rather than “ancient monuments” • Table 3 – Use “Scheduled Monuments” and “Registered Parks and Gardens” 	
<p>23069 Orbit Homes</p>	<p>Object</p>	<p>Note comments:</p> <ul style="list-style-type: none"> • Wymondham biggest settlement outside of Norwich Urban Area but has little growth of a scale which means it won’t gain infrastructure investment creating further strain, • New settlement in area hasn’t been considered as a reasonable alternative. • Need to re-balance growth to align with wider growth and economic strategies in plan – Wymondham should be identified as priority location for strategic development. • Para67 – A11 corridor is focus but no sites with immediate access to this have been allocated. • Unfulfilled road investment schemes are highlighted in the plan which are uncertain and illogical when compared to the newly dualled A11. • Transforming Cities funding bid is welcomed but this should inform the need to allocate growth in a way that sustainable transport connections can be planned from the outset to maximise the benefit of the funds. Wymondham’s Mobility Hub will improve public transport in the area and so more growth should be allocated here. 	
<p>23099 Salhouse PC</p>	<p>Comment</p>	<ul style="list-style-type: none"> • Why should Norwich not have a Green Belt (para 104)? This would address some of the objectives e.g. paras 132, 133 and 144 	<p>Provide greater detail on why Greater Norwich does not have the exceptional circumstances required by Government to establish a Green Belt. This should include the evidence on this issue set out in the Issues and Options document and provide references to the quoted paragraphs 132, 133 and 144 in coming to this decision.</p>

			Consider whether more detail on this decision should also be included in the supporting text for the strategy.
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QUESTION 6

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 6 - Do you support or object to the vision and objectives for Greater Norwich?
TOTAL NUMBER OF REPRESENTATIONS:	71 (55 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	25 Support, 18 Object, 28 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS
22460 Breckland DC	Comment	<ul style="list-style-type: none"> welcomes objective but seeks clarification whether 95% premises are in GNLP or in Norfolk Is target date of Spring 2020 realistic? Can GNLP confirm whether rural areas within GNLP have 4 or 5G? map of FEZ not included in the pack. How will this relate to other proposed growth in the area? Welcome objective for electric vehicles and autonomous vehicles but seeks clarification, how will demand on power grid from EVs be managed? Particularly in areas identified for major developments including the A11 tech corridor. Details on criteria for charging points is sought incl. which types of development and type of charging.
19904 Public	Comment	Great vision but reads like a political manifesto; want to see it delivered
19938 Public	Object	<ul style="list-style-type: none"> Vision is misleading; Growth does not bring improvements, rather it increases traffic, pollution, strain on services, environmental damage, loss of countryside and lowers quality of living. Empirical evidence is needed for statements or they should not be included.
20021 public	Support	Highlights need to develop whilst maintaining character of the area

20064 Public	Comment	environment section looks self-congratulatory yet little has been done. Scientists are saying we're at tipping point with climate change, but most resources are already strained e.g. water which has caused conflict between farmers and the nature reserves
20433 public	Support	Agree but concerned about deliverability, objectives to be carried through with residents rather than inflicted upon them.
20506 Marlingford and Colton PC	Object	<ul style="list-style-type: none"> • Growth proposed conflicts with aim of environmental aims largely due to lack of appropriate infrastructure. • Village cluster concept is flawed with the primary schools inadequate for the proposed growth. • Prioritising Norwich's brownfield sites and the larger satellite communities would be more responsible.
20614 public	Support	General support but delivery of homes unlikely to succeed due to inappropriate sites being chosen. e.g. strategic extension and garden villages are reasonable alternatives in Wymondham but are inconsistent with development strategy which identifies 1,000 dwellings for Wymondham to offset non-delivery. These would not be delivered quickly enough to address any shortfall. These sites should not have been preferred over smaller, more easily delivered sites, such as GNLP0320
20636 Noble Foods Ltd - Farms	Object	General support but delivery of homes unlikely to succeed due to inappropriate sites being chosen. e.g. the greenfield site GNLP2143 is preferred but GNLP3035 which contains vacant and unused buildings is unreasonable.
20667 CPRE Norfolk + 20741, 21467, 21845, Hempnall PC (posted 3 times) + 22656 Saxlingham Nethergate PC + 23100 Salhouse PC	Object/ comment	<ul style="list-style-type: none"> • Seems to be a wish list with no real target or actions, particularly regarding environment/climate change. • Para 37 notes men's life expectancy is 10.9 years lower in most deprived areas than least deprived, there are no specifics on how this will be addressed. • Para 120 advises of need for good services and facilities, but many village clusters do not have these. Instead growth is based on Primary school places which have no correlation. Village clusters should not have new housing. • Para 125 discussed need for greener transport but allowing growth in village clusters means more journeys (work & leisure) which can only be done by car increasing the carbon footprint, congestion and affecting air and quality of life for residents. • Para 129 – we feel per capita consumption of water needs reducing below government's prescribes 110l per person per day to deliver this statements aims. East Anglia is driest UK region and growth will impact water availability for the people, land and farmers. New houses should be restricted to what is needed and phased, with an appropriate buffer that isn't over what is necessary.

		<ul style="list-style-type: none"> • Para 132 Minimising loss of greenfield is best achieved by not allocating in village clusters, there is already sufficient housing in JCS for Norwich, its fringe, the towns and KSC's. Should phase building prioritising Norwich brownfield sites • To further prevent loss of greenfield land a Green Belt on the green wedges around Norwich should be instituted as requested by 84 respondents and 1,912 petition signatories (currently at 2,200 signatures) in the Stage A Reg 18 consultation Sept 18. Concerned this proposal/option has been removed from current consultation.
20838 Welbeck Strategic Land III LLP + 21172 Hopkins Homes, Persimmon Homes & Taylor Wimpey via Bidwells + 21200 Kier Living Eastern Ltd via Bidwells	Comment	Delivering high quality homes that contribute to the delivery of mixed, inclusive, resilient and sustainable communities that are supported by appropriate economic and social infrastructure is fully supported. The approach is fully consistent with the NPPF.
20964 Public	Object	<ul style="list-style-type: none"> • Growth targets are unchallenging, using labels to sound better. • Without zero carbon targets it is impractical to argue growth will create more emissions. • No future proofing of new thinking is shown.
20988 Public	Comment	<ul style="list-style-type: none"> • Too much growth will kill communities • Moved to Wymondham for the community and with the promise of school, health facilities and care homes being improved, none of which has happened. Families have to use taxis to get their children to school outside of Wymondham.
21128 Public	Comment	Aim is to move away from private car use but Horsford has limited employment meaning growth will lead to more car use.
21258 Lanpro Services	Support	<ul style="list-style-type: none"> • Generally supportive especially of Para 108 (support growth of low carbon economy through Cambridge Norwich Tech Corridor (Also Para 119))

+ 21377 Glavenhill Ltd via Stephen Flynn		<ul style="list-style-type: none"> • Not sure these will be delivered as stated in answers to q13 &14 • Para 113 should also refer to employment growth on strategic sites in Cambridge-Norwich Tech Corridor otherwise para108 aims won't be met • para 127 – concerned vision for infrastructure is incompatible with high dispersal in SN small villages. Support concept of village clusters but the number in SN is incompatible with stated environmental objectives due to car reliance.
21299 Public	Comment	<ul style="list-style-type: none"> • Environment should be the priority with the economy being strategized within these confines. • Prioritise active travel and passive homes
21341 Reedham PC	Object	Village clusters conflicts with environmental aims (due to travel and greenfield use) and many do not have sufficient provision/access to services.
21411 Active Norfolk	Comment	<ul style="list-style-type: none"> • Para 109 – Prioritises economy over people feels wrong - link to NCC Plan core outcomes; Thriving People, Strong communities and Growing Economy? • Para 110 addresses some of this but is only descriptions on the outcome of the vision
21433 Public	Comment	<ul style="list-style-type: none"> • Para120 – increased housing leads to inner city wilderness, not lively, vibrant centres • Local towns and cities already lively and vibrant, don't fix something that isn't broken • Issues of doughnut developments – Stalham High Street should be heart of community but destroyed by supermarket built on its fringes
21437 Public (Same person as 21433)	Comment	Para 123 – poor weekend trains to/from London, fixing will lower car journeys. This has been an ongoing problem
21442 Bergh Apton PC	Comment	<ul style="list-style-type: none"> • Pleased majority of growth will occur in Norwich brown sites. • Concerned South Norfolk proposing 1,200 dwellings through village clusters as well as windfall of an extra 400 all in addition to 1349 already allocated
21452, 22411 Lawson Planning Partnership on behalf of Horsham Properties Ltd	Comment	<p>Support vision & Objectives for the economy as it recognises smaller scale employment sites as important, however it should also be recognised within Policy 6. A flexible approach that allows for appropriate expansion of existing small and medium employment sites should be adopted.</p> <p>Request policy 6, paragraph 2 is amended to be “(The allocation and retention of smaller scale employment sites across the area) and the potential expansion of a range of existing small and medium sized sites”</p>

21716 Brown & Co	Support	Support vision and consider proposals for new settlement, Honingham Thorpe, and its associated benefits would help achieve these
21722 RSPB	Support	<ul style="list-style-type: none"> • Support principles but there is a lack of details. Greater aspirations for net zero emissions needed as early as possible • more stringent water targets needed • NCC aims to be carbon neutral by 2030, this should be applied to new development in GN area as a minimum and 2038 as maximum • Nature should be a focus
21795 Berliet Limited via Barton Willmore	Support	Para 135 – support, particularly reference to efficient use of housing given long-term and historic challenges regarding delivery of houses vs target.
21817 Barford & Wramplingham PC	Object	<ul style="list-style-type: none"> • Para135, 125 & 120, environmental sustainability vision, reducing transport needs and good access to services & facilities, are inconsistent with village cluster growth. • Also, Para 132 - minimising loss of greenfield land • More houses (greater than needed) will increase pressure on water availability • Sites in Wymondham and those around Honingham and Colton, Wramplingham and Barford will increase water drainage pressure on rivers Tiffey and Tud and increase likelihood of flooding in Barford and Wramplingham. • The sites could result in disproportionate housing growth around villages. • Phased approach needed with allocated brownfield sites prioritised. • Delivery statement on economic development lacks focus or vision. House building should not be driver for local economy
21892 Barton Willmore on behalf of KCS Developments	Comment	<ul style="list-style-type: none"> • the broad vision should reference need to accelerate housing delivery in accessible locations to support job growth • Support building most homes around Norwich and Cambridge Tech Corridor • More emphasis needed on new housing within towns and villages to aid them in becoming vibrant locations with good access to services, facilities and employment. • Needs to be followed through into the proposed hierarchy and distribution of new housing growth within GNLP.
21923 Horsford PC	Object	Vision flawed for outlying villages like Horsford e.g. para 125 need to shift away from private car use which would be exacerbated by housing growth in an area with limited employment & services. In Horsford there would be need to cross major A road if cycling/walking.

21932 UEA Estates & Buildings	Support	Support vision to support a low carbon economy through jobs in Cambridge Norwich Tech Corridor. Also support economic objectives of supporting expansion of knowledge-based industries in Cambridge Norwich tech corridor
21977 SN Green Party (similar to CPRE response)	Object	<ul style="list-style-type: none"> • para120 – Village clusters aren't accessible and sustainable, they have insufficient access to services. Primary schools are not a good factor of determining this. Should be less growth in village clusters. • Para126 – will be a long time before electric vehicles are predominant, so rural communities aren't sustainable as they would increase in the carbon footprint, congestion, and decrease air quality and wellbeing for locals. Housing should be close to jobs. • Para 129 – Support CPRE's statement that Per Capita Consumption of water is reduced below government's prescribed 110l per person per day to avoid compromising existing users water supplies. This reinforces case for phasing of housing and questions of need for higher buffer. • Para 132 – minimising loss of green land should mean not allocating additional village cluster sites. Prioritising brownfield sites (starting in and around Norwich) should occur in a phased approach. • To further prevent loss of greenfield land a green belt on the green wedges around Norwich should be instituted as requested by 84 respondents and 1,912 petition signatories (currently at 2,200 signatures) in the Stage A Reg 18 consultation Sept 18. Concerned this proposal/option has been removed from current consultation.
22016 Mulbarton PC	Object	<ul style="list-style-type: none"> • Plan is wish list with no real targets. • Too much growth in Mulbarton has caused strain on infrastructure, congestion and access to health care. • Transport has diminished and there has been no infrastructure growth. • Lack of access to services and facilities means there should be no housing growth within village clusters. • More housing = more travel for work & deliveries. • To minimise loss of greenfield housing should not be allocated in village clusters, there are sufficient allocations from JCS. • Conflicts between Local Plan and Mulbarton Neighbourhood Plan. • No phasing or statement of progress of developments.
22034 East Suffolk Council	Support	<ul style="list-style-type: none"> • Para 108 – support overall vision and objectives • Para 111 – include meaning of clean growth/transport/ energy/water. • Terms should be explained in text or in glossary
22056	Support	<ul style="list-style-type: none"> • Supports vision for economic growth.

Norwich International Airport		<ul style="list-style-type: none"> • Site 4 can be considered strategic employment site which supports GNLP’s vision.
22062 Norfolk Wildlife Trust	Comment	<ul style="list-style-type: none"> • Support visions & Objectives in principle, particularly requirements to protect & enhance natural environment and reduce emissions. • Expect next draft to specifically reference biodiversity net gain and creation of a Nature Recovery Network as core objectives of plan
22125 + 22691 + 22782 M Scott Properties Ltd via Strutt & Parker LLP	Comment	<ul style="list-style-type: none"> • Agree that addressing climate change is one of the most important factors for the future and should be a key consideration. • Plan needs to look beyond 2038 particularly regarding Governments Net Zero Carbon by 2050 aim. • Plan should also understand implications of what Net Zero Carbon will be and develop appropriate strategy to ensure this is achievable. • Our client’s site can help address visions and objectives
22152, 22320, 22360, 23163 Pigeon Investment Management Ltd via Pegasus Group	Comment	Welcome vision aims and how they accord with objectives of sustainable development.
22252 Taylor Wimpey via Carter Jonas LLP	Comment	Generally support topics within Vision and Objectives however, the home and delivery aims would not be achieved in full as some inappropriate site have been preferred e.g. GNLP0581/2043 which would take too long to deliver and are uncertain to provide appropriate levels of housing. Our site GNLP0172 has no constraints and is able to be delivered within the needed time.
22271 Landstock Estates Limited and Landowners Group Ltd via Barton Willmore	Comment	<ul style="list-style-type: none"> • Vision broadly supported but method of achievement and distribution is not. Number of homes should be increased to improve affordability, these should be planned to be close to public transport and facilities – e.g. NE Wymondham Site. • Para 114 – Cambridge Norwich Tech Corridor will achieve this growth, Wymondham is placed here . • Desire to locate 1,200 in villages where there are limited services, cycle routes and public transport is contrary to principles of sustainable development. • Para 117 – the Local Plan should undertake services audits of each settlement and identify a hierarchy of centres, prioritising those with the greatest variety. • Without this the plan’s soundness is questionable.

		<ul style="list-style-type: none"> • Growth locations on Map 7 appear to have no rationale. • Para 126 – client wholly supports, NE Wymondham site will help with aim to reduce car travel, will be harder to achieve these aims in small rural settlements. • Objectives reference delivery of housing, jobs and infrastructure. NPPF tests delivery and the previous plan failed this, particularly in housing which has impacted affordability and access to housing. • Should recognise 6,100 home shortfall and seek to remedy it to successfully delivered locations.
22384 Norwich Green Party	Object	<ul style="list-style-type: none"> • economy – object to growth axis along Cambridge Norwich tech corridor – land use, transport and environmental implications of developing along A11 in open countryside. Wide corridor 100kms in length has been progressed without policy testing, SEA and prior public consultation. • infrastructure- oppose improve connectivity regarding major road building schemes. Add need to reduce travel and manage demand for private car travel • delivery – oppose as climate change targets are also integral to delivery
22386 Norwich Green Party	Support	communities - support
22387 Norwich Green Party	Comment	<ul style="list-style-type: none"> • homes – add zero carbon and high quality • environment – re-word “.....and to significantly reduce emissions to ensure that Greater Norwich plays a full part in meeting national commitments to achieve net zero GHG emissions by 2050 as well as implementing adaptations to climate change”. • clean growth needs clarifying; needs to go far enough to meet net zero carbon by 2050 and improving road links is inconsistent with this
22429 Gladman Developments	Comment	<ul style="list-style-type: none"> • Support general pro-sustainable growth vision. Need to include secure integration of economic, housing and infrastructure strategies to ensure development pattern is sustainable and deliverable • Gladman broadly supports objectives, though in some cases they don’t go far enough. Economic objectives should expand to recognise role of housing delivery in supporting sustainable economic growth, particular need to ensure maximum economic growth potential met through the City Deal and A11 Norwich Cambridge tech corridor • Homes objectives should be expanded to ensure housing needs of elderly and disabled are met.
22508 Broadland Green Party	Comment	<ul style="list-style-type: none"> • Para120 – increased housing leads to inner city wilderness, not lively, vibrant centres • Local towns and cities already lively and vibrant, don’t fix something that isn’t broken

22627 M Scott Properties Ltd via Bidwells	Support	Support, consistent with NPPF
22716 Public	Object	vision based on growth delivering benefits but this is not the case, it only brings more pollution, traffic, poorer services, more environmental damage, loss of countryside and lower quality lives. Unless there's empirical evidence the vision is misleading
22721 Pegasus Group on behalf of Halsbury Homes Ltd	Support	Client supports with the 6 objectives and will be able to assist in delivery of sustainable development via their site Land off Norton Road, Loddon
22752 Public	Object	<ul style="list-style-type: none"> • Concentrates on developments in Broadland and South Norfolk increasing reliance on private transport ignoring the vision of Norwich City Council. • Lacks clarity for future of Norwich and its relationship with rest of county. Employment and retail at edges of city with more rural housing suggests the county is intended as a dormitory to the fringes of Norwich and acceptance of continued decline of the city centre. • Ignores concerns in Norwich Economic Strategy of unimplemented office consents in Broadland and adds employment provision to north of Norwich. • Fundamental flaw in considering Greater Norwich in isolation from rest of county, large group of Norwich employees live over 20 miles from workplace. Would seem logical for employment to be in larger surrounding areas rather than Norwich. • Travel to Work Area (TTWA) for Norwich in 2018 Norwich Economic Assessment covers a wider area than Greater Norwich. • Several large towns within Norwich TTWA within & outside of Greater Norwich area which are ignored in consultation, what is model and vision or these towns and rest of county? • Historically rural hinterland attracted to major towns and villages for employment and shopping. Policy concentrating employment in Norwich and rise in personal transport attracts this population to city to detriment of towns. • Consultations solely on Greater Norwich will continue decline of Norfolk's towns, economy of county is more important factor for Norwich's prosperity.

		<ul style="list-style-type: none"> Contest GNLP proposals present coherent plan and sustainable.
22843 Crown Point Estate via Pegasus Group	Object	<ul style="list-style-type: none"> Transport modal shift supported but not enough detail or methods on how to achieve, particularly regarding infrastructure. Constrained by lack of detail on Transport for Norwich review including Park & Ride Network – we promote Loddon Road P&R as part of solution. Support for electric vehicles is encouraging but where will charging infrastructure be located? New homes built with ports won't cater to owners who don't have access at home or work – public EV charging stations needed which is promoted at Loddon Road P&R site Concerned need for low-tech employment space has not been translated into policy (discussed in section 5) – this means jobs won't be available for all
22844 Crown Point Estate	Support	<ul style="list-style-type: none"> Support stimulating economic investment and economic growth within vision. It is important developments and GI go hand-in-hand. Consider additional land at WCP GNLP3052 should be safeguarded for future delivery of GI. Should be supported in addition to Country Park at Horsford. Safeguarding additional land for country park use will facilitate confidence in investment in the site. Support objectives for economy, environment & housing
22872 & 23012 Bidwells on behalf of Abel Homes	Support	<ul style="list-style-type: none"> Submission for site GNLP0520 & GNLP0125 <p>Support, consistent with NPPF</p>
22892, 22930, 22949, 22984 Bidwells	Support	<ul style="list-style-type: none"> A submission for each site – GNLP0133-B/C/D/E Support vision for low carbon economy which is competitive with the Cambridge Norwich tech corridor. Also support economic objectives of support for expansion of knowledge-based industries in the tech corridor
23070 Orbit Homes & Bowridge Strategic Land via David Lock Associates	Object	<ul style="list-style-type: none"> Support and agree with vision as providing sound basis for plan focusing on key issues. But these need to be translated into policies and allocations. Policies needed to encourage and support the success of the Tech corridor by ensuring jobs, homes and infrastructure. Do not consider allocations meet needs of all or are in the right place for sustainability. Almost 70% growth in the Urban area does not align with visions and objectives. With so much Norwich growth, how will aims for Corridor growth be met?
23129 Bidwells on behalf of	Support	<p>Support, consistent with NPPF</p>

Hopkins Homes		
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QUESTION 7

STRATEGY QUESTION:	Question 7 - Are there any factors which have not been covered that you believe should have been?
SETTLEMENT/ SITE REFERENCE:	
TOTAL NUMBER OF REPRESENTATIONS:	16 (15 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 15 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
19939 public	Comment	Statements in vision and objectives need empirical evidence	Statements are based on evidence supporting the plan, including in the Spatial Portrait. Assess whether there is a need to clarify this.
20040 Public	Comment	<ul style="list-style-type: none"> Shortage of 3-bedroom detached bungalows on Taverham Drayton area, none currently being built. Too many sites with planning permission which aren't being built out by the builders who own the land, creating a housing shortage, forcing up prices and increasing the book value of building companies, whilst defying the need for housing to be built - permissions should be conditional on a build by date and building types of properties needed 	Note comments: <ul style="list-style-type: none"> On bungalows in relation to allocations in the Taverham/Drayton area – the urban extension proposed for Taverham does include new bungalows; on implementation of permissions in relation to the delivery statement and policy 1.
20878	Support	<ul style="list-style-type: none"> Para 117 – Encourage inclusion of 'employment' under access to services to increase pedestrian 	Noted. Assess whether there is a need to amend the wording on communities as suggested.

Town and Country Planning Association		<p>movements and contribute to healthier lifestyles.</p> <ul style="list-style-type: none"> • Wording to be; "...new communities will be designed to make active travel and public transport the easiest travel choice and therefore reduce the need to travel by private vehicle." • In Communities heading use wording; "...with good access to jobs, services and facilities, helping to reduce health inequalities in disadvantaged parts of the community." 	
21261 Lanpro Services via Stephen Flynn	Comment	Objectives for growing vibrant and healthy communities should include good access to education as well as jobs, services and facilities.	Noted. Assess whether there is a need to add a reference to education as well as jobs, services and facilities.
21378 Glavenhill Ltd via Stephen Flynn	Comment	Objectives for growing vibrant and healthy communities should include good access to education as well as jobs, services and facilities.	
21418 Active Norfolk	Comment	<ul style="list-style-type: none"> • Inclusive Growth System needs more than economic growth (Marmot 2010), it needs a system approach • Marmot's '10 Years On' publication observes the importance of 'place' in people's health; <ul style="list-style-type: none"> • People can expect to spend more of their lives in poor health • Improvements to life expectancy have stalled, and for the poorest 10% of women has declined • Health gap grown between wealthy and deprived areas 	Noted. Assess whether there is a need to amend the wording on communities and Active Design as suggested.

		<ul style="list-style-type: none"> • Para 117 is misleading, need to travel remains. Opening statement should be amended to 'the promotion and implementation of Active Design principles (Sport England) will reduce dependence on motor vehicle travel and improve active travel options.' • Para 121 – Recommend it refers to Active Design; 'Homes will have been built at appropriate densities, Active Design principles will be applied to promote active lifestyles, function and style will respect and enhance local character and to meet the needs of all in mixed communities.' • Para 126 – agree and support 	
21717 Brown & Co	Comment	<ul style="list-style-type: none"> • More emphasis needed regarding moving housing away from areas of flooding (Fluvial and surface water) in light of predicted effects of climate change. • Measures needed to tackle surface water flooding to form part of a multi-functional network, e.g. as part of GI and biodiversity measures 	Noted. Assess whether there is a need to increase the focus on flooding as suggested. This issue is currently referenced in the V + O and detailed in policy 2.
21725 RSPB	Comment	<ul style="list-style-type: none"> • Para 126 – suggest plan collaborates with adjacent authorities plans so charging points etc are at start and end of journeys while promoting an enjoyable experience. • Para 133 – no specific mention of what habitats are and where connections are to be made. Tree planting in the right locations for carbon 	Comments noted. The Vision and Objectives deliberately do not detail how policies will be implemented, but do set a broad picture of how the area will have changed by 2038. Strategic policies in the main body of the plan set out the mechanisms for achieving the outcomes. Consider how best to clarify this point, including whether some further detail is needed in the V + O, perhaps on specific GI which will have been improved by 2038.

		<p>capture, SuDS to resolve surface water run-off, collection reservoirs providing grey water. Scale of ambition should be outlined, even if details need to work out in Supplementary Planning Documents</p> <ul style="list-style-type: none"> • how has countryside access been improved/provided? • Which environmental assets will be improved, where and how will this be achieved? How will location for improvements be chosen? • To support carbon neutrality, more focus is needed on improving existing developments. What is the link between old and new? How will new housing improvements be applied to retrofits or upgrades? To support carbon neutrality, more focus is needed on improving existing developments. 	<p>Consider the comments on energy efficiency for policy 2.</p>
<p>21830 Natural England</p>	<p>Comment</p>	<ul style="list-style-type: none"> • Vision needs to be better balanced to address climate change – current focus on growth is against two pillars of sustainable development. • In previous consultation we recommended changing Para 110 to ‘... and an a protected and enhanced environment’. • Para 110 should also have the following; ‘Growth will make the best of Greater Norwich’s distinct built, natural and historic assets whilst protecting and enhancing them.’ • Expect GI to feature predominantly in plan as has a crucial role in following objectives; 	<p>Noted. Assess whether:</p> <ul style="list-style-type: none"> • there is a need to increase the focus on climate change and GI as suggested; • specific wording on the protection and enhancement of the environment should be included.

		<p>economy, communities, homes, infrastructure and environment. Text for each objective heading, and para 135, should include reference to this.</p> <ul style="list-style-type: none"> • GI was discussed in previous response and wish to re-emphasise its importance. Unless GI is given prominence with explanations for how, where and when it will be delivered, the plan is unlikely to be sustainable or be able to adapt to climate change. 	
<p>22272 Barton Willmore on behalf of Landstock Estates Ltd and Landowners Group Ltd</p>	<p>Comment</p>	<p>Copied from Q6</p> <ul style="list-style-type: none"> • Vision broadly supported but method of achievement and distribution is not. Number of homes should be increased to improve affordability, these should be planned to be close to public transport and facilities – e.g. NE Wymondham Site. • Para 114 – Cambridge Norwich Tech Corridor will achieve this growth, Wymondham is placed here . • Desire to locate 1,200 in villages where there are limited services, cycle routes and public transport is contrary to principles of sustainable development. • Para 117 – the Local Plan should undertake services audits of each settlement and identify a hierarchy of centres, prioritising those with the greatest variety. • Without this the plan’s soundness is questionable. 	<p>Consider the need for amendments to the Vision and Objectives and to the overall strategy based on the comments.</p>

		<ul style="list-style-type: none"> • Growth locations on Map 7 appear to have no rationale. • Para 126 – client wholly supports, NE Wymondham site will help with aim to reduce car travel, will be harder to achieve these aims in small rural settlements. • Objectives reference delivery of housing, jobs and infrastructure. NPPF tests delivery and the previous plan failed this, particularly in housing which has impacted affordability and access to housing. • Should recognise 6,100 home shortfall and seek to remedy it to successfully delivered locations. 	
22321 Pigeon Investment Management Ltd	Comment	<p>Ref GNLP 0525 Copied from Q6 Welcome vision aims and how they accord with objectives of sustainable development.</p>	Support noted.
22362 Pigeon Investment Management Ltd	Comment	<p>Ref GNLP 0177 A&B & 1023 A&B Copied from Q6 Welcome vision aims and how they accord with objectives of sustainable development.</p>	
22388 Norwich Green Party	Comment	<ul style="list-style-type: none"> • Economy: target of 1000's new homes should act as stimulus to develop local manufacturing of zero carbon construction materials • Homes: add requirement to build to maximum energy efficiency standards such as Passivhaus. Reading Local Plan is making zero carbon housing mandatory for major residential developments unless demonstrated as unviable. On-site renewable energy standards should be 	Note comments and assess the need for changes to the strategy, particularly policy 1 covering the overall growth strategy, policy 2 on energy efficiency and landscape protection and policy 4 covering transport infrastructure.

		<p>set as well as carbon offsetting scheme to secure off-site carbon reductions.</p> <ul style="list-style-type: none"> • Infrastructure: Urgent need to address smaller Transforming Cities grant than anticipated. Reduced funds should mean reduced quantum of development to prevent car dependency. • Environment: Need for green belt/wedges to prevent coalescence of communities e.g. Hethersett and Wymondham; protect river valley settings and protect setting of NDR similar to Southern Bypass 	
22509 Broadland Green Party	Comment	<ul style="list-style-type: none"> • Para 123 – reference local rail transport links – Bittern and Wherry lines need improving to encourage rail use (e.g. more routes Norwich, Brundall, Reedham & G. Yarmouth) • Norwich Airport growth inconsistent with reduced carbon emissions • Norwich Western Link needs improving rather than new road creation across Wensum Valley • Para 126 – clear plans needed to achieve shift away from private car, insufficient details currently • Para 129 – more active intervention and co-ordination of infrastructure than has been seen if to be realised – clear plans needed to achieve this. 	Note comments and assess need for changes to the strategy, particularly to policy 4 covering transport infrastructure.
22717 Public	Comment	Empirical evidence needed to support unsubstantiated statements in vision and objectives	Statements are based on evidence supporting the plan, including in the Spatial Portrait. Assess whether there is a need to clarify this.

23101 Salhouse PC	Comment	building houses to support jobs or providing jobs for people moving into houses? Unclear whether jobs or houses driving development	Assess whether there is a need to clarify that both the housing needs of the existing population and housing growth needs emerging from the increase in employment locally influence the strategic approach.
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QUESTION 8

STRATEGY QUESTION:	Question 8 - Is there anything that you feel needs further explanation, clarification or reference
SETTLEMENT/ SITE REFERENCE:	
TOTAL NUMBER OF REPRESENTATIONS:	18 (16 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	2 Support, 3 Object, 13 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
20022 public	Support	<ul style="list-style-type: none"> Happy with explanations 	Support noted
20876 Town and Country Planning Association	Support	<ul style="list-style-type: none"> Pleased with commitment to vibrant, healthy, inclusive and growing communities. Urge further recognition of high-quality design in creating healthier environments to promote active lifestyles in vision 	Note support on inclusive communities. Consider the need to place greater focus on the importance of high-quality design in creating healthier environments to promote active lifestyles in the vision.
21263 Lanpro Services via Stephen Flynn + 21379 Glavenhill Ltd via Stephen Flynn	Comment	<ul style="list-style-type: none"> Explanation & justification needed for removing NPA. Understand OAN has to be calculated across whole plan area but NPA approach for developments to be centred around the city was sound and sustainable. New strategy for increased dispersal to smaller settlements outside of NPA has not been adequately explained or justified. If the strategic growth area replaces the NPA then growth should be focussed within NPA and particularly Cambridge Norwich Tech Corridor. 	Note comments on the plan's strategic approach and assess whether amendments are required accordingly to policy 1.

		<ul style="list-style-type: none"> • Significant growth yet to be identified and is outside strategic growth area which conflicts with plan's main vision/aims 	
21435 Public	Comment	<ul style="list-style-type: none"> • Para 130 – what actions will increase efficiency in water usage? • Also, how will air pollution be reduced when woodland and green areas will be lost and there are planned road expansions? 	Water efficiency in new development will be required through measures in policy 2 to limit domestic and commercial usage. Increased planting of green infrastructure as part of new development will assist in reducing air pollution.
21718 Brown & Co	Comment	<ul style="list-style-type: none"> • Clarification needed for how delivery will be achieved. • How will site delivery be evidenced – especially for failed deliveries from previous plan period. • Clarification on when and how council will intervene on non-delivery of infrastructure. 	
21727 RSPB	Comment	<ul style="list-style-type: none"> • Seem to be more aspirations than statements. • Recommend tabular representation showing how objectives link to outcomes and outputs. • Objectives need to be SMART – Specific, measurable, achievable, realistic and time-bound. 	<p>Consider whether it is appropriate to amend the V + O as suggested re statements and use of a table.</p> <p>Appendix 3 sets out how the objectives will be measured through smart indicators. Assess whether further clarification of this is required in the text.</p>
21818 Barford PC	Object	<ul style="list-style-type: none"> • How is clay-brick-built housing compatible with environmental sustainability given its high carbon footprint? 	View on the use of bricks for locally for much of development noted. Consider in relation to policy 2.
22181 Environment Agency (Eastern Region)	Comment	<ul style="list-style-type: none"> • Para 130 – challenge finding water for new developments. No technology currently with no consumptive use of water. • Some considered technologies could produce high amounts of carbon e.g. desalination 	Note comments on water supply, efficiency, waste water, green infrastructure and wider issues in relation to both the V + O and the plan's

		<ul style="list-style-type: none"> • Need more holistic thinking regarding water usage; infiltration and groundwater recharge in headwaters. • Slow the flow techniques and retrofitting water saving measures to existing properties could be considered. • Suggest adding “New water efficient buildings will have also contributed to the protection of our water resources and water quality, helping to ensure the protection and encourage enhancement of our rivers, the Broads and our other wetland habitats” • Add importance of ensuring new developments do not breach environmental legislation due to increased polluting load from waste water treatments works serving developments. • How will greater efficiency in water and energy usage minimise need for new infrastructure – sewerage, mains water/electric supply and transport links still needed. • More water efficient buildings can help but more people, buildings and infrastructure will lead to increased pressure on broads and wetland habitats. • Insistence should be for new developments to aim for 100% retention of surface water. • New waters should incorporate water saving and grey water retentions e.g. sustainable heating solutions and good insulation • Para 133 include importance of trees in providing climate resilience through percolation rates, shading and cooling rivers & contribute to net zero emissions 	strategic policies, especially policies 2 and 3.
22183 Environment Agency (Eastern Region)	Comment	<ul style="list-style-type: none"> • Environment section needs to ensure biodiversity crisis is as pressing as climate crisis - they are linked. • Separate biodiversity plans and objectives needed 	Consider need to strengthen wording in V + O on biodiversity, including reference to biodiversity plan and objectives.
22273	Comment	Copied from Q6	Consider the need for amendments to the Vision and Objectives and to the

<p>Landstock Estates Limited and Landowners Group Ltd via Barton Willmore</p>		<ul style="list-style-type: none"> • Vision broadly supported but method of achievement and distribution is not. Number of homes should be increased to improve affordability, these should be planned to be close to public transport and facilities – e.g. NE Wymondham Site. • Para 114 – Cambridge Norwich Tech Corridor will achieve this growth, Wymondham is placed here . • Desire to locate 1,200 in villages where there are limited services, cycle routes and public transport is contrary to principles of sustainable development. • Para 117 – the Local Plan should undertake services audits of each settlement and identify a hierarchy of centres, prioritising those with the greatest variety. • Without this the plan’s soundness is questionable. • Growth locations on Map 7 appear to have no rationale. • Para 126 – client wholly supports, NE Wymondham site will help with aim to reduce car travel, will be harder to achieve these aims in small rural settlements. • Objectives reference delivery of housing, jobs and infrastructure. NPPF tests delivery and the previous plan failed this, particularly in housing which has impacted affordability and access to housing. • Should recognise 6,100 home shortfall and seek to remedy it to successfully delivered locations. 	<p>overall strategy based on the comments.</p>
<p>22322 & 22363 Pigeon Investment Management Ltd via Pegasus Group</p>	<p>Comment</p>	<p>Copied from Q6 – posted twice – Once for 0177 A&B, 1023 A&B and once for 1044 Welcome vision aims and how they accord with objectives of sustainable development.</p>	<p>Supportive comments noted</p>
<p>22390 Norwich Green Party</p>	<p>Comment</p>	<ul style="list-style-type: none"> • re-word environment policy - “.....and to significantly reduce emissions to ensure that Greater Norwich plays a full part in meeting national commitments to achieve net zero GHG emissions by 2050 as well as implementing adaptations to climate change”. 	<p>Consider:</p> <ul style="list-style-type: none"> • amending the wording of the V + O re emissions targets and clean growth.

		<ul style="list-style-type: none"> clean growth needs clarifying, is it from the Government's Clean Growth Strategy – we disagree with this as it doesn't go far enough cutting carbon emission to meet net zero carbon by 2050 and improving road links is inconsistent with this 	<ul style="list-style-type: none"> comments on road building for policy 4.
22484 Highways England	Comment	Suggest infrastructure aim is reworded to highlight the delivery of infrastructure to provide improved connectivity by encouraging modal shift and other carbon reducing measures, and where this cannot be achieved, other physical measures to support existing community to allow access to economic and social opportunities	Consider amending the wording of the V + O re modal shift and access to existing community facilities.
22461 Breckland DC	Comment	<p>Copied from Q6</p> <ul style="list-style-type: none"> welcomes objective but seeks clarification whether 95% premises are in GNLP or in Norfolk Is target date of Spring 2020 realistic? Can GNLP confirm whether rural areas within GNLP have 4 or 5G? map of FEZ not included in the pack. How will this relate to other proposed growth in the area? Welcome objective for electric vehicles and autonomous vehicles but seeks clarification, how will demand on power grid from EVs be managed? Particularly in areas identified for major developments including the A11 tech corridor. Details on criteria for charging points is sought incl. which types of development and type of charging. 	Consider the need for amendments to the introductory sections of the plan
22510 Broadland Green Party	Comment	<ul style="list-style-type: none"> Para 130 – Need specific practical measures to improve water & energy efficiency Para 131 – How can air pollution be reduced when roads are being expanded and woodland/green areas are being destroyed? plan's objectives fine as aspirations except net zero greenhouse emissions by 2050 which needs to be more ambitious due to severity of situation. NCC's target is net zero carbon emissions and working towards carbon neutrality by 2030 	<p>Practical measures to improve water & energy efficiency are set out in policy 2.</p> <p>Consider views on green infrastructure and road building for policies 3 and 4.</p> <p>Consider amending climate change targets.</p>

22530 Historic England	Object	<ul style="list-style-type: none"> • Para 110 – ‘historic assets’ should be ‘historic environment’ as encompasses all aspects of heritage e.g. cultural heritage • Environment – separate natural and historic environment here • Para 132 – Welcome reference to distinctive local characteristics however landscape should be referenced. More specifics would be helpful (what is unique, what is ‘heritage’?) • Objectives – broadly welcomed, helpful to separate natural and historic environment or change title to reference built, historic and natural environment. 	Consider amendments to the structure and specific wording of the V + O based on He’s comments.
23102 Salhouse PC	Object	<ul style="list-style-type: none"> • Paras 117 & 125 – wrong as facilities are closed and people need to travel for them • GI is a misnomer as refers to patchwork of unconnected spaces which may not permit biodiversity across area 	Objection noted on access to facilities and the role of GI. Consider for policies 3 and 4.

QUESTION 9

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 9 - Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?
TOTAL NUMBER OF REPRESENTATIONS:	52 (42 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	19 Support, 21 Object, 12 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
20023 Public	Support	<ul style="list-style-type: none"> • Delivery statement fine • More emphasis on affordable housing through council housing 	Note support for Delivery Statement. Consider the view that there should be more emphasis on council housing through policy 5 on homes.
20046 Public	Object	<ul style="list-style-type: none"> • Too much emphasis on speed of house building • Closing/reducing city traffic with only limited public transport • Increasing traffic in growth areas with housing development 	Note comment on overemphasis on the speed of housing delivery. Consider comments on transport for policies 2 and 4.
20263 Brockdish & Thorpe Abbots PC	Object	<ul style="list-style-type: none"> • Support CPRE; • 2016 housing projections should be used. • Windfall sites to be accounted for in new site requirements. • Over-allocating housing sites and allowing owners/ builders to decide if, when and where housing takes place – local authorities lose 	Consider comments on; <ul style="list-style-type: none"> • housing numbers, delivery and windfall for policy 1; • affordable housing for policy 5 on homes.

		<p>control meaning no effective infrastructure coordination and no link between housing need and development.</p> <ul style="list-style-type: none"> Affordable housing is not effective in addressing most serious needs. 	
20329 Public	Object	<ul style="list-style-type: none"> To protect countryside, JCS allocated housing should be built before any new allocations. This could benefit climate as people will be closer to places of work. 	Consider comments on the phasing of housing delivery and climate change for policy 1.
20434 Public	Object	<ul style="list-style-type: none"> Infrastructure should be in place before/during new housing to avoid disrupting communities more than necessary and adding to traffic issues/service oversubscription and signal/internet issues. 	Consider comments on the infrastructure delivery for policies 1 and 2.
20467 Public	Object	<ul style="list-style-type: none"> New houses should be within 3 miles of employment. Tacolneston has had considerable housing in spite of little employment opportunities locally, people rely on private car use contributing to climate issues. 	Consider comments on the location of housing close to jobs for policy 1, noting the implications for villages such as Tacolneston .
20494 Public	Object	<ul style="list-style-type: none"> Too much housing in plan – an indiscriminate haste to cover more land with concrete No mention of space for nature Housing design needs attention 	<p>Consider:</p> <ul style="list-style-type: none"> comments on housing numbers for policy 1; whether green spaces and housing design should be specifically mentioned in the Delivery Statement in addition to the coverage elsewhere in the plan.
20615 Public via Carter Jonas LLP	Object	<ul style="list-style-type: none"> Object to housing approach in delivery statement, specifically contingency location for growth at Wymondham and the sites 	Consider comments on the contingency sites and proposed new settlements for policy 1 and the Sites policies. Note the view that small sites are considered to be more deliverable.

		<p>considered reasonable alternative/contingency locations.</p> <ul style="list-style-type: none"> • Strategic extensions and garden villages have been identified as reasonable alternatives, but the contingency is only 1,000. They also wouldn't be able to be delivered quickly enough to address a shortfall. • The reasonable alternative sites are therefore not deliverable as contingencies. • There are smaller, more reasonable alternatives to meet this need e.g. GNLP0320 	
20637 Noble Foods Ltd – Farms via Carter Jonas LLP	Support	<ul style="list-style-type: none"> • Directing housing delivery to villages is supported. • But there are more suitable sites in Marsham e.g. GNLP3035 	Consider the comments on village sites for policy 1 and the Sites policies. Note support for site in Marsham.
20668 CPRE Norfolk + 20742 + 21469 + 21846 Hempnall PC 22657 Saxlingham Nethergate PC	Object	<ul style="list-style-type: none"> • Should use more up to date figures • Should include windfall in the buffer • 9% more homes than needed is too high • No mention of phasing • Likely current commitment is sufficient to cover 18 years of new housing development – no new sites needed. 	Consider the comments on housing numbers, using windfalls in the buffer and phasing for policy 1.
20839 Welbeck Strategic Land III LLP via Bidwells	Comment	<ul style="list-style-type: none"> • Support submission of delivery plans as part of planning application • Agree with contingency but to guard against non-delivery, minimum 10% buffer should be used (as stated on P45 of draft GNLP) • Contingency locations to be upgraded to committed. 	<p>Note:</p> <ul style="list-style-type: none"> • support for the use of delivery plans • the view that the buffer should be raised and contingencies allocated/role clarified. • support for growth being in urban areas and main towns <p>Consider view on evidence needs for larger sites for policy 1.</p>

		<ul style="list-style-type: none"> Contingency sites are ambiguous; when/where development may be located? This may undermine ability to ensure deliverability in a coordinated manner. Support growth being in urban areas and main towns. Evidence needed to show development will happen at these sites, particularly large strategic allocations which are commitments but yet to be delivered. 	
20965 Public	Support	<ul style="list-style-type: none"> Too many existing permissions without action 	Not support for promoting delivery of sites with planning permission.
21087 Saving Swainsthorpe Campaign	Comment	<ul style="list-style-type: none"> Statements are relevant and compelling Housing approach inconsistent with the statements, e.g. use of old statistics, over allocation of housing, reliance on other villages to provide housing without infrastructure to support. Climate change statements worthy but lack coherence and targets e.g. supporting increase in sustainable transport rather than initiating 	Consider the comments on housing numbers, villages, infrastructure and climate change for policy 1.
21175 Hopkins Homes, Persimmon Homes & Taylor Wimpey Via Bidwells	Support	<ul style="list-style-type: none"> Support sites being allocated which have reasonable prospect of delivery Support delivery plans but unforeseen changes could impact delivery – flexibility needed Support for 9% buffer 	Note support and view that flexibility is required over delivery plans.
21201 Kier Living Eastern Ltd via Bidwells	Support	<ul style="list-style-type: none"> Support sites being allocated which have reasonable prospect of delivery Support delivery plans but unforeseen changes could impact delivery – flexibility needed 	

<p>21265 Lanpro Services via Stephen Flynn + 21380 Glavenhill Ltd via Stephen Flynn</p>	<p>Object</p>	<ul style="list-style-type: none"> • Support emphasis on growing Cambridge Norwich Tech Corridor • No evidence of delivery of the 36,000 commitments and existing allocations is provided • Told evidence of delivery will be provided in Reg 19 which is too late for meaningful responses • What is definition of Strategically significant development? How realistic is use of compulsory purchase when it is costly and time consuming? • 9% buffer below NPPF's required 10% • Contingency option should be identified, and the process explained for how & when it will be allocated. • Currently 4,000+ possible contingency sites in Wymondham which is large, vague and provides doubt in confidence of GNLP regarding delivery • 13,430 of commitments in Growth Triangle where delivery to date has been slow 	<p>Consider the comments for policy 1.</p>
<p>21342 Reedham PC</p>	<p>Comment</p>	<ul style="list-style-type: none"> • Why is 9% buffer needed? • If windfall predictions included in calculation, there would not be a need for surfeit. • Why is there no phasing option? 	<p>Consider the comments on:</p> <ul style="list-style-type: none"> • the buffer; • using windfalls in the buffer • and phasing <p>for policy 1.</p>
<p>21439 Public</p>	<p>Comment</p>	<ul style="list-style-type: none"> • No provision for allotment space in any developments despite statement in Policy 2 objective 	<p>Consider whether there is a need for specific requirement for allotments in site allocation policies in addition to requirement for green infrastructure set in policy 2.</p>

21719 Brown & Co	Support	<ul style="list-style-type: none"> • Support approach to housing in Delivery Statement. • Query definition of reasonable prospect of delivery, given carried forward allocations - some which have come from 2004. • Honingham Thorpe settlement would deliver housing numbers with good links to the agri-tech corridor and Clarion being well placed to deliver 	Note general support for the DS. Consider the comments on delivery prospects of existing allocations and the potential for a new settlement at Honingham Thorpe for policy 1.
21819 Barford & Wramplingham PC	Object	<ul style="list-style-type: none"> • opaque policy on village cluster sites inconsistent with climate change statement in Table 5. • No bus service for Wramplingham and few in Barford • How will more houses rectify situation and provide more services for the houses? 	Consider the comments on village clusters, bus services and climate change for policy 1.
21935 UEA Estates & Buildings via Bidwells	Support	<ul style="list-style-type: none"> • Support sites being allocated which have reasonable prospect of delivery – GNLP 0133-C&E are suitable, achievable, viable and deliverable • Support delivery plans as part of planning application but unforeseen changes could impact delivery – flexibility needed • 9% buffer supported 	Note support for buffer and view that: <ul style="list-style-type: none"> • flexibility is required over delivery plans • Sites at UEA are deliverable.
21978 SN Green Party	Object	<ul style="list-style-type: none"> • Disagree with 9% buffer • villages should not have growth without suitable public transport provision • Phasing should be an option – support CPRE 	Consider the comments on: <ul style="list-style-type: none"> • the buffer; • using windfalls in the buffer • and phasing for policy 1.

		<ul style="list-style-type: none"> • Only 45% Norwich & 41% SN homes are well insulated which is a waste of energy and bad for environment • 12% households in area in fuel poverty (unable to adequately heat home) • Upgrading insulation of 3,309 per year within Norwich area would ensure all homes insulated by 2030 • Helpful to quote Certification schemes being used, TCPA recommend; BRE's High Quality Mark BREEAM for buildings, CEEQUAL for public/infrastructure and BREEAM for communities and Passihaus Trust 's assessment frameworks. • Air pollution impact assessment should be required for applications likely to negatively impact air quality. • Developments that create street canyons to be avoided • Minimum no. of electric vehicle charging points per 10 dwellings to be stipulated 	Consider comments on energy efficiency, design, electric vehicles and air pollution for policy 2.
22017 Mulbarton PC	Object	<ul style="list-style-type: none"> • Why is 9% buffer needed? • If windfall predictions included in calculation, there would not be a need for surfeit. • Why is there no phasing option - Support CPRE 	Consider the comments on: <ul style="list-style-type: none"> • the buffer; • using windfalls in the buffer • and phasing for policy 1.
22121 landowner via MDPC Town Planning	Object	<ul style="list-style-type: none"> • GNLPO283 meets reasonable prospect of delivery requirement and offers small scale growth at villages and on brownfield sites as mentioned in delivery statement. 	Note the view that site GNLPO283 is considered to be more deliverable. Consider for policy 7 and the Sites plan.

<p>22126 M Scott Properties Ltd via Strutt & Parker LLP</p>	<p>Support</p>	<ul style="list-style-type: none"> • Support promoting of sites with reasonable prospects of delivery • 9% buffer accords with need to ensure sufficient amount and variety of land can come forwards. Recognised this will be 10% at Reg19 with village cluster allocation included. • Given uncertainty of Carrow Works site recommend where reasonable alternatives exist in sustainable locations, additional smaller sites (up to 25 dwellings) should be allocated to increase certainty around delivery and supply. • Client's site (GNLP0341) is one such site 	<p>Note support for overall approach including the buffer. Consider comments on Carrow Works for policies 1 and 7 and the Sites policies. Note the view that small sites are considered to be more deliverable.</p>
<p>22253 Taylor Wimpey Strategic Land via Carter Jonas LLP</p>	<p>Object</p>	<ul style="list-style-type: none"> • Object to contingency locations for growth in Costessey to offset non-delivery of housing elsewhere – particularly reasonable alternative/contingency sites located in settlements • The strategic extension unlikely to be delivered within time needed to address shortfall in short term. • lead in times are more than 5 years due to complexity of sites meaning these aren't deliverable as contingency sites. • There are smaller sites locally which would better serve need, e.g. GNLP 0284R 	<p>Consider comments on the contingency sites and proposed new settlements for policy 1 and the Sites policies. Note the view that small sites are considered to be more deliverable.</p>
<p>22274 Landstock Estates Ltd and Landowners Group Ltd via Barton Willmore</p>	<p>Comment</p>	<ul style="list-style-type: none"> • Broadly support housing approach • Growth within villages should be assessed as part of a single plan, 1,200 homes on small sites with limited jobs/infrastructure is not supported. 	<p>Consider comments on overall growth, village growth, trajectories and delivery of existing allocations for policy 1 and the Sites policies. Note the view that sites in Wymondham are considered to be more deliverable.</p>

		<ul style="list-style-type: none"> • Minimum number of houses allocated using standard method but NPPG highlights growth strategies and housing deals that facilitate greater growth are reasons to have higher numbers of housing. • The City Deal plans for additional 13,000 jobs and 3,000 homes by 2026, added to JCS 27,000 jobs this should be reflected in Economy Chapter and supporting text to Policy 6, SHMA identifies need for 44,714 homes. • But table 6 highlights need for 40,451 homes. • SHMA also highlights need for additional 8,361 homes for the additional workers associated with the City Deal. • With the previous shortfall and the change with the standard method, as well as the need identified in the City Deal and SHMA, we believe a 20% should be applied. • With this in place additional growth should be allocated in sustainable locations, e.g. the tech corridor • With the under delivery of the previous plan we believe housing numbers are accelerated in early years of plan period, the 20% buffer should be provided to Five Year Housing Supply. • Plan currently relies on previously undelivered sites (e.g. growth triangle) which have no evidence for delivery making the soundness of plan risky. 	
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		<ul style="list-style-type: none"> • HELAA is vague on delivery details and no anticipated trajectory. • Recommend strategy is revisited and supports development in areas with proven deliverability records, e.g. Wymondham which is well placed and historically delivers on growth 	
22391 Norwich Green Party	Support	Support greater use of legal powers. Developers are dragging heels on redeveloping brown field sites in Norwich at expense of countryside.	Note support for use of legal powers to promote delivery of brownfield sites
22393 Norwich Green Party	Object	Object to providing 9% more homes than needed and identifying two 'contingency' locations, especially if windfalls are to be discounted (and we object to this also). The Plan should ensure delivery of JCS allocations before developing new sites allocated in GNLP.	Consider opposition to the use of buffer and contingency sites through for policy 1.
22511 Broadland Green Party	Comment	<ul style="list-style-type: none"> • All new housing must be carbon neutral or at least built to Passivhaus standards. • There is no provision for allotment space in any of the current developments despite it being a clearly stated Policy 2 objective. 	Consider both issues for policy 2.
22628 M Scott Properties Ltd	Support	Support general approach to delivery + buffer. Need to recognise that there may be unforeseen material changes in circumstances, which could impact the delivery of an allocation.	Note support and consider amendments to text to reflect view on changing circumstances.
22692 Strutt & Parker LLP	Comment	The Delivery Statement set out at Paragraph 139 of the Draft Strategy sets out that the Plan will promote a pro-active approach to delivery through only allocating housing sites where a reasonable prospect of delivery can be evidenced, taking into	

		<p>account policy requirements. This approach accords with paragraph 67 of the NPPF and is supported.</p> <p>16. In terms of providing flexibility and including a 9% buffer, this accords with the objective of ensuring that a sufficient amount and variety of land can come forward. It is also recognised that it is proposed that the buffer will increase to 10% at the Regulation 19 stage, when the village clusters allocations will be included. It is acknowledged that the Plan aims to comply with the NPPF paragraph 68 requirement to accommodate at least 10% of housing requirement on sites no larger than 1 ha. However, given the uncertainty around the Carrow Works site (1,200) homes, it is recommended that where reasonable alternative sites exist in sustainable locations, additional smaller sites of up to c. 25 dwellings (expected delivery from 1 ha) should also be allocated throughout the Plan area to increase certainty around delivery and supply, particularly in the early parts of the Plan period, supporting the Government’s objective of significantly boosting the supply of homes.</p>	
<p>22722 Pegasus Group</p>	<p>Comment</p>		

QUESTION 10

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 10 - Do you support, object, or have any comments relating to the approach to Economic Development set out in the Delivery Statement?
TOTAL NUMBER OF REPRESENTATIONS:	18 (14 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	9 Support, 4 Object, 5 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
20024 Public	Support	More needed to encourage economic growth in market towns.	Ensure that the economy and the hierarchy policies cover the issue of encouraging economic growth in market towns.
21088 Saving Swainsthorpe Campaign	Comment	<ul style="list-style-type: none"> See our comments relating to housing in Q9, for 'housing' read 'economic development' Q9 Housing comments - “the approach to housing is inconsistent with those statements, for example the use of old statistics on housing need, the overshoot of planned numbers of houses, the developing reliance on 'other villages' to provide housing growth without any clear statement as to the provision of infrastructure to support this growth.” 	Consider the comments on housing numbers, villages, infrastructure and climate change for policy 1.
21266 Lanpro Services via Stephen Flynn + 21381	Comment	<ul style="list-style-type: none"> Fails to mention Cambridge Norwich Tech Corridor Needs emphasis in this section if there is a commitment to making growth here happen 	Consider changes to the statement to put more emphasis on the Cambridge Norwich Tech Corridor and the relevant ambitions of the LEP and Norfolk and Suffolk Economic Plan.

Glavenhill Ltd via Stephen Flynn		<ul style="list-style-type: none"> Should mention and integrate relevant ambitions of the LEP and Norfolk and Suffolk Economic Plan. 	
21457 + 22414 Horsham properties Ltd via Lawson Planning Partnership Ltd	Object	<ul style="list-style-type: none"> Not supported with regard to existing Cambridge Norwich Tech Corridor Needs emphasis in this section if there is a commitment to making growth here happen Should mention and integrate relevant ambitions of the LEP and Norfolk and Suffolk Economic Plan. Policy 6 requires amending as more flexibility is needed to accommodate needs not anticipated by local Plan or to enable expansion of employment sites Policy 6, Para 2, bullet point 1 to be amended to; <u>“the allocation and retention of smaller scale employment sites across the area and the potential expansion of, a range of existing small and medium sized sites”</u> 	Consider specific amendments suggested to policy 6 to place more emphasis on small and medium sized employment sites.
21720 Brown & Co	Support	<ul style="list-style-type: none"> Support economic delivery as set out Proposed Honingham Thorpe new settlement relates well to this approach 	Note support and potential role of Honingham Thorpe as a new settlement.
21936, 22895, 22932, 22951 & 22986 UEA Estates & Buildings via Bidwells	Support	<ul style="list-style-type: none"> support identified growth strengthening Norwich’s role in the national economy with particular reference to Norwich Cambridge Tech Corridor Identification of preferred allocations of GNLP0133-B&D & GNLP0140-C will promote growth in knowledge-intensive sectors. Preferred allocation GNLP0133-C&E will support enhancement of UEA to promote knowledge sector-based growth 	Note support for text on Norwich Cambridge Tech Corridor and view that sites at UEA will promote knowledge sector-based growth.
22057 Norwich international Airport via Barton Willmore	Comment	<ul style="list-style-type: none"> Site 4 (north-east of Norwich Airport) can contribute to region’s large-scale development; supporting a number of uses including large-scale B2 & B8 employment space. Site proposed for mix of aviation and non-aviation uses with flexibility to release for general employment based on market demand. 	Note view that site 4 at Norwich Airport can contribute to employment growth for the economy policy and the sites plan.

		<ul style="list-style-type: none"> Flexibility to include non-aviation employment space will bring site into economic use and contribute to provision of infrastructure to support aviation-related employment (a knowledge-intensive sector) 	
22394 Norwich Green Party	Object	<ul style="list-style-type: none"> object to expansions and new allocations until high quality public transport & walking and cycling networks are provided to avoid dependence on car/van/lorry access. Economic development in rural location that generate car, van and HGV use are objected to Digital based jobs are acceptable in these locations 	Note view that sustainable access is required to employment sites and digital jobs should be promoted in rural areas for the economy and infrastructure policies.
22395 Norwich Green Party	Support	Support concentrating employment in Norwich City Centre	Note support for concentrating employment in Norwich City Centre
22512 Broadland Green Party	Object	<ul style="list-style-type: none"> Assumption continues economic growth will help the county is flawed – unsustainable economic growth has brought on climate emergency, population growth is declining and economic growth does not improve happiness and wellbeing. Economy should serve population, a circular, zero-growth economy underpinned by; transition to renewable energy, designing out waste and pollution, keeping products and materials in use and maintain/regenerate natural systems. 	Note view that there should be a zero-growth economy underpinned by sustainable policies.
22753 Public	Object	Due to the way the region has grown, the distances between housing and employment/leisure is now such that without public transport the majority of population relies on their cars.	Note view that the area is car dependent for policies 1 on the hierarchy and 4 on infrastructure.
22847 Crown Point Estate via Pegasus Group	Support	<ul style="list-style-type: none"> Support approach for smaller scale and rural employment sites However smaller scale is not defined, appropriate sites need formal allocation to avoid being classified as countryside which would be ruled against under DM policies. Park Farm is being promoted for employment 	Consider specific amendments to policy 6 to place more emphasis on small employment sites and note support for allocation of Park Farm.

		<ul style="list-style-type: none">• Low value, low-tech plays a vital role in wider economy. This relies on lower-cost rural sites as they are priced out of new-build business parks in more central locations.	
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QUESTION 11

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 11 - Do you support, object, or have any comments relating to the approach to Infrastructure set out in the Delivery Statement?
TOTAL NUMBER OF REPRESENTATIONS:	30 (24 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	18 Support, 6 Object, 6 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
19941 Public	Object	<ul style="list-style-type: none"> • experience of last 20 years suggests infrastructure delivery has failed to support existing growth in population – traffic congestion, failing public transport, air pollution increase, water demand is unsustainable health services are failing. • Change to statement is needed to reflect past failings and a realistic and justified expectation of future performance should be given as currently there is little likelihood of success by doing more of the same. 	Note view that the statement should be re-written to reflect past failings in infrastructure provision and provide a realistic and justified expectation of future performance.
20025 Public	Support	Support but greater investment needed to support public transport across a wider network and all aspects of social care and education.	Note support and view that more investment is required in public transport, social care and education.
20047 Public	Comment	<ul style="list-style-type: none"> • Building houses does not necessarily lead to improved infrastructure • Infrastructure is 10-20 years out of date, other than Lidl/Aldi stores which create more traffic 	Note comment on poor infrastructure provision and loss of green areas for housing.

		<ul style="list-style-type: none"> • Green belt land being lost for houses 	
20497 Public	Object	<ul style="list-style-type: none"> • No admittance of NDR failings (Economic & Environmental) • The Western Link Road will be the same if it proceeds in its current form 	Note views on road issues, including for policy 4.
20840 Welbeck Strategic Land III LLP via Bidwells + 21177 Hopkins Home, Persimmon Homes & Taylor Wimpey via Bidwells + 21202 Kier Living Eastern Ltd via Bidwells + 21938, 22896, 22952, 22987, 23181 UEA Estates and Building via Bidwells +22874, 23015 Abel Homes via Bidwells 23131 Hopkins Homes via Bidwells	Comment/ Support	<ul style="list-style-type: none"> • Support principle • Clarify infrastructure requirements will be proportionate and based on assessment of need. If not it's unviable and undeliverable 	Note broad support in principle for the approach to infrastructure from a number of developers and the view that infrastructure requirements should be proportionate and based on need to make sites viable.

<p>20897 Norfolk Constabulary via NPS Property Consultants Ltd</p>	<p>Object</p>	<ul style="list-style-type: none"> • Should include specific reference to Norfolk Police • Wording to be revised to; “Infrastructure priorities benefit existing communities, support growth, improve connectivity and access to economic and social opportunities, maintain and enhance safe and cohesive communities and deliver sustainable and active travel choices to promote modal shift. The Greater Norwich partners will continue to work to coordinate delivery with other providers including Highways England, Anglian Water, other transport and utilities companies, town and parish council, Norfolk Police and local health care providers. Infrastructure will be delivered through:” 	<p>Note the view that the Norfolk Police should be specifically referenced in the infrastructure section of the statement and in policy 4.</p>
<p>21090 Saving Swainsthorpe Campaign</p>	<p>Comment</p>	<ul style="list-style-type: none"> • Transport section favours road widening/increases • Road building increases traffic rather than reduces congestion 	<p>Note view that road investment increases traffic</p>
<p>21267 Lanpro Services via Stephen Flynn + 21382 Glavenhill Ltd via Stephen Flynn</p>	<p>Support</p>	<p>Support importance of early engagement with infrastructure providers and delivery of required infrastructure to support growth</p>	<p>Note support</p>
<p>21723 Brown & Co</p>	<p>Support</p>	<ul style="list-style-type: none"> • Support infrastructure approach, essential to deliver infrastructure for sustainable development. • New Honingham Thorpe Settlement would provide infrastructure solutions from the start. • Also well related to planned road improvements 	<p>Note support and supportive views on the proposed new settlement at Honingham Thorpe in relation to infrastructure</p>
<p>22127 M Scott Properties Ltd</p>	<p>Comment</p>	<ul style="list-style-type: none"> • Site developers will work to coordinate delivery with providers to ensure infrastructure will be delivered. • Development of GNL P 0341 will support this via CiL, Provision of development through conditions/local agreements, maximising 	<p>Note comments on the role of new sites in providing infrastructure</p>

via Strutt & Parker LLP		government funding, investments of public bodies & utilities companies and locally led delivery vehicles	
22396 Norwich Green Party	Object	<ul style="list-style-type: none"> • ‘improve connectivity’ permits more road building – change to ‘improve connectivity for public transport and local rail, walking and cycling’ • transport infrastructure strategy isn’t consistent with Paris Agreement – need traffic demand management e.g. infrastructure for workplace parking charges and enabling transition to zero carbon vehicles. • Refer to importance of ‘soft’ infrastructure e.g. education to distinguish from hard infrastructure 	Note views on infrastructure provision to support sustainable travel and “soft” infrastructure through both the statement for policy 4
22485 Highways England	Comment	Funding for the Strategic Road Network will also be provided through the current and future Road Investment Strategies within the Statement of Funds Available	Note comments on funding for the Strategic Road Network
22513 Broadland Green Party	Object	<ul style="list-style-type: none"> • To promote a modal shift in transport it’s not enough to include a few aspirational cycle/footpaths whilst also expanding roads. • Highways England & NCC Highways are road builders rather than transport infrastructure facilitators and innovators • Small Scale/rural employment sites may not require as many infrastructure requirements but there are still constraints from drainage to public transport and broadband/mobile coverage • Aspiration to coordinate delivery with other providers, needs more effort to be more effective e.g. NCC Highways working with Highways England and include Anglian Water in housing/business development 	Note views on infrastructure provision through both the statement and for policy 4
22693 M Scott Properties Ltd via Strutt & Parker LLP	Comment	<ul style="list-style-type: none"> • Site developers will work to coordinate delivery with providers to ensure infrastructure will be delivered. • Development of GNLP 2136 will support this via CiL, Provision of development through conditions/local agreements, maximising 	Note comments on the role of new sites in providing infrastructure

		government funding, investments of public bodies & utilities companies and locally led delivery vehicles	
22718 Public	Object	<ul style="list-style-type: none"> • experience of last 20 years suggests infrastructure delivery has failed to support existing growth in population – traffic congestion, failing public transport, air pollution increase, water demand is unsustainable health services are failing. • Change to statement is needed to reflect past failings and a realistic and justified expectation of future performance should be given as currently there is little likelihood of success by doing more of the same. • By any reading of the term sustainability, the current model and policies have failed, and the proposals in this new plan which continue on the same route, must therefore be deemed to fail the basic test of sustainability. 	Note view that the statement should be re-written to reflect past failings in infrastructure provision and provide a realistic and justified expectation of future performance.
22723 Halsbury Homes Ltd via Pegasus Group	Support	<ul style="list-style-type: none"> • Broadly supportive • Level of financial contribution should be subject to formal viability exercise being conducted 	Note broad support for the approach to infrastructure and the view that infrastructure requirements should be viable.
22750 Landowners via Rosconn Group	Support	<ul style="list-style-type: none"> • Generally supportive of prioritising benefits and delivery of infrastructure to help existing communities, support growth and improve connectivity • Recognition should be given to development industry's role in bringing forward key infrastructure; often central to funding and delivery alongside new housing and economic development 	Note broad support in principle for the approach to infrastructure and the view that the statement should recognise the role of developers in bringing forward infrastructure.
22784 Strutt & Parker LLP	Support	<ul style="list-style-type: none"> • Site developers will work to coordinate delivery with providers to ensure infrastructure will be delivered. • Development of GNLP 0291 & 0342 will support this via CiL, Provision of development through conditions/local agreements, maximising government funding, investments of public bodies & utilities companies and locally led delivery vehicles 	Note support and comments on the role of new sites in providing infrastructure.

22848 Crown Point Estate via Pegasus Group	Support	<ul style="list-style-type: none">• Support priorities, particularly intent to shift to sustainable modes of transport.• Little in plan to support this, e.g. allocations for P&R sites.• Promoting Loddon Road P&R	Note broad support for the approach to infrastructure and view that P + R allocation in Trowse would support modal shift.
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QUESTION 12

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 12 - Do you support, object or have any comments relating to the Climate Change Statement?
TOTAL NUMBER OF REPRESENTATIONS:	62 (52 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	20 Support, 19 Object, 23 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
20557, 20563, 20769, 22149	Object	<p>The GNLP is deeply flawed. It appears to pursue a political agenda rather than duly considering sensible and pragmatic issues and flouts national policy on climate change mitigation.</p> <p>The recent Court of Appeal decision to rule the expansion of Heathrow unlawful because it didn't take climate change commitments into account puts the proposed GNLP in a dubious position, given that its proposed higher levels of rural development would lead to increases in carbon emissions, which contravenes national planning policy to facilitate their reduction. This would inevitably lead to it being challenged on that basis. It could even be that a legal challenge would be upheld and the policy deemed unlawful.</p> <p>The GNLP is a redundant document, given that the current Joint Core Strategy has only been in effect since 2014 and covers the period up to 2026.</p>	<p>Relevance of the Heathrow decision to plan-making</p> <p>Need to the replace the JCS which runs to 2026</p> <p>Abandonment of JCS focus on growth in the Norwich area, supported by expensive investment in NDR, in favour of more growth in villages</p> <p>Climate change policy should lead strategy – contradiction of a strategy which aims to assist the move to a post-carbon economy and protect</p>

		<p>Certainly, the unexplained change in policy in the GNLP concerning rural development is startling and inappropriate.</p> <p>One of the core strategies in the JCS was to locate housing and other growth primarily in and close to Norwich, with minimal new development to be permitted in rural areas. One of the stated reasons for the development of the NDR, at great public expense, was to help the distribution of traffic to and from new housing built inside its length and in the northeast growth triangle (as that is what the JCS pointed to). The GNLP consultation document abandons that policy and sacrifices the important protection the JCS gave rural communities against inappropriate development. The main justification for this appears to be the availability of primary school places in the village clusters. The issue of climate change is a much more important factor and appears to have been completely ignored despite the introduction stating that the GNLP must also assist the move to a post-carbon economy and protect and enhance our many environmental assets. This goal is completely undermined by the proposed policy.</p>	<p>environmental assets whilst also promoting more growth in villages</p>
<p>23104 + 20669 Salhouse PC & CPRE Norfolk 21847 + 21470 + 20743 Hempnall PC + 22658 Saxlingham Nethergate PC</p>	<p>Object</p>	<p>Given the stated measures in the Climate Change Statement, it is impossible to see how the proposed additional allocation of sites for housing in village clusters can be justified. Furthermore, it is stated that growth in villages is located where there is good access to services to support their retention, when this is rarely the case beyond providing a primary school with sufficient places or room for expansion. Many services are simply not located within the village clusters with many additional vehicle journeys being an inevitable consequence of such housing allocations. Therefore, these would be contrary to measures 2 and 3 of the Climate Change Statement.</p> <p>By locating additional housing in village clusters there would be an increased need to travel, particularly by private car, due to the lack of viable and clean public transport. If Climate Change is seriously going to be addressed then it is unacceptable to allocate additional sites for housing in rural areas which</p>	<p>Additional allocations in village clusters contrary to measures 2 and 3 of the Climate Change Statement which makes it unacceptable to allocate additional sites for housing in rural areas which are not at all, or poorly served by public transport and have limited employment.</p> <p>Concerned by the lack of any detailed policy on the design of new housing other than a brief mention in the</p>

		<p>are not at all, or poorly served by public transport. New housing must be located where jobs and a wide range of services are or can be provided. In addition CPRE Norfolk is concerned by the lack of any detailed policy on the design of new housing in the draft Plan document, other than a brief mention in the Design of development in the Climate Change Statement. Detailed requirements to insist that new houses are built to the highest possible environmental standards beyond the Government's minimum standards are needed, if serious steps are to be taken towards addressing Climate Change issues.</p> <p>Local employment with reduced travel to work is only feasible for a single worker households. Where there are two income earners in a household, it is unlikely that both will be able to work locally. This is a fundamental flaw of such policies.</p> <p>New houses should have solar panels, be insulated to highest standard and include grey water capture</p>	Design of development in the Climate Change Statement.
20267 Brockdish & Thorpe Abbots PC	Object	<p>Note view that:</p> <ul style="list-style-type: none"> • Aspirations but ineffective follow on. • Policies should lead on how they will address climate change. • Village Cluster policy is an example of opportunity lost: no criteria on location of housing and how countering climate change is to be helped. • Design of development means little when SNDC acknowledge that Building Regulations can only be changed to the extent that builders will cooperate. 	Consider under policies 1, 2 and 7.
20496	Object	<p>Note view that:</p> <p>The commentary in the Climate Change Statement seems to be a complete fantasy. Many of the things relating to living near services is not happening now either because the services do not exist, have been eliminated by</p>	Consider revision to statement to further clarify local declarations of climate emergencies and under policies 1, 2, 3 and 7.

		austerity or development being allowed indiscriminately. No mention of nature from the small to the large. No mention of green lungs or recreational areas or water usage. No necessary wildness. In fact the opposite is occurring with the cutting down of trees for road or housing development. No recognition that there is a climate emergency.	
20270 Dickleburgh + Rushall PC	Comment	Note view that: GNLP team to assess the environmental cost of the whole GNLP process. GNLP to put forward plans to mitigate against the cost. These could be: <ul style="list-style-type: none"> • Delivered at the micro level within the parishes / towns / city where the development takes place • Macro - South Norfolk Broadlands Norwich designate new public space forest wood are within the county clearly identified as carbon offset for the development of the GNLP • Macro - create new connecting green lung areas identified as GNLP carbon offset land. 	Consider under: Monitoring section + policies 2 and 3 which deal with on site and strategic green infrastructure delivery and subsequently through ongoing Implementation Plans which support GI delivery.
20220	Comment	This is not ambitious enough. We need radical change. Solar PV should not be free standing it should be on every roof that is appropriate for this. You need to have stronger more rapidly instigated building regs on sustainable development all building should be built to Passivhaus standards. Traffic free routes everywhere so that all children can bike and walk to school safely. Incentives to give up your car. Radically improved electric public transport. Good broad band connections everywhere so that people can work locally and do meetings by skype reducing the need for travel.	Noted. Consider clarifying wording in the climate change statement and through: Policy 2 whether the policy, which covers the broad range of issues on creating sustainable communities that planning can address in new development, could have its design focus made clearer. This includes setting local standards as permitted by government. Policy 4 which covers strategic infrastructure including public

			transport and broadband and through local transport plans
20593 Climate Friendly Policy and Planning		<p>We welcome the Climate Change Statement as, for the first time in the GNLP process, issues relating to Climate Change have been brought together in one place.</p> <p>However, the statement serves only as a set of pointers into other policies. It does not provide a Climate Change (CC) policy. As such, it is not effective in providing an overarching policy on CC that can have effective weight at later planning application stages which is required by the legislation.</p> <p>Despite, para.140 stating how the NPPF requires local plans to set strategic policies which address CC mitigation and adaptation, the statement does not fulfil this requirement.</p> <p>However, the statement, with its different limbs, forms that basis of material that could be converted into the skeleton of an overarching GNLP Climate Change policy. Such a policy would be a very positive step for GNLP to take considering the Climate emergency. However, we emphasise the word skeletal, as there would be additional work to take the skeletal structure provided by the statement and turn it into a robust policy, as we outline below. We posit strongly that this is done for the next draft of the plan (see Stroud District Local Plan Review for example policy).</p> <p>We note that the Director of Place, Norwich City Council, has commented that there is a disconnect between the Climate Change statement and the policy substance needed for the plan to contribute significantly to delivery of a low carbon future.</p> <p>Trend based baseline carbon emissions, budgets and targets</p>	Note comments on climate change issues when reviewing the relevant policies and the statement. In particular, consider whether a single climate change policy would be appropriate and whether the draft plan’s proposed approach to targets and monitoring, transport and energy generation should be amended.

		<p>Overall there has been a 28% reduction in emissions over this period. The figure above shows that in Greater Norwich area, Industry and Domestic emissions have reduced whilst Transport emissions are rising and are at the same levels as in 2005. In general, national trends in the decarbonisation of electricity has enabled significant reductions for industrial and domestic carbon footprints. A robust climate change policy in the GNLP could have further significant impact locally on bringing down Industry and Domestic emissions.</p> <p>Road transport emissions have made no significant reductions in over 14 years, indicating a major policy failure, both nationally and locally. This may only be remedied by a very tough set of policy interventions in transport for modal shift away from private car use; electric vehicles may only play a small part in decarbonising transport for reasons we give elsewhere. The GNLP Climate Change and Transport policies should have reducing transport emissions as their number one objective.</p> <p>Policy 4: Transport</p> <p>Policies 2 and 4 are mentioned in the Climate Change Statement table). The DEFRA Clean Growth Strategy objective to meet a 30% reduction in carbon emissions from road transport by 2032 should be included here as a footnote (before footnote 49). As above, the SA states that this objective will not be met by the plan.</p> <p>More detailed comments on Egnida EIS document</p> <p>Throw away comments in the Climate Change statement encourage community-led initiatives such as the promotion of decentralised, renewable</p>	
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		and low carbon energy use or securing land for local food sourcing, Policy 7.1 providing for sustainable energy generation, including a local energy network serving the (East Norwich) area as a whole much more development within the plan.	
19821	Comment	<p>The transport strategy seems insufficiently ambitious. Rather than just promoting active travel and public transport, there needs to be a strategy to actively discourage car use, including building developments that do not include storage for vehicles other than bikes and car club vehicles.</p> <p>It would also mean that any development includes filtered streets, so that cars can only drive in and out but not through.</p> <p>All new properties must have space to store a bicycle, and identify how to access a cycle route, in a similar manner to the Oxford Local Plan.</p>	<p>Consider under policy 2 whether:</p> <p>the wording of this policy could make its design focus on promoting sustainable movement clearer</p> <p>the “hook” on promoting cycling is adequate.</p>
20026	Support	Support, but must be delivered and even expanded upon.	Noted. Consider under policy 1.
20048	Support	Support any effort to reduce emissions but you don’t achieve this by increasing traffic!	Noted. Consider under policies 1 and 4.
20613 Public	Comment	<ul style="list-style-type: none"> • Provision needed to reduce/stop pollution activities as well as promoting low-carbon ones • Decisions should be based on carbon impact & emission monitoring – carbon footprint impacts of development & infrastructure, reject proposals incompatible with zero carbon target and climate budgets. • Aims are positive but vague – measurable targets needed 	Note comments on pollution when reviewing policy 2. Consider whether the draft plan’s proposed approach to targets and monitoring should be amended.
20625 Public	Object	<ul style="list-style-type: none"> • Climate needs to be more central to plan (as per TCPA’s Planning for Climate Change document), include possible impact of developments and factor them into relevant policies. • Para 84 shows projected temperature & precipitation changes, but nothing is done with these 	Note comments on infrastructure when reviewing policy 4. Consider whether the draft plan’s proposed approach overall climate change policy and to targets and monitoring should be amended.

		<ul style="list-style-type: none"> Development & Infrastructure decisions to be based on contributions and compatibility with transition to zero carbon. 	
20841 & 22875 & 23016 Abel homes via Bidwells	Comment	Principles of policy are capable of being delivered/supported by proposed development	Note supportive comment
20967 Public	Comment	<ul style="list-style-type: none"> Change wording of Para 136 to be more proactive – not ‘help’ and assist’ but ‘will’. Para 141 – need for perpetual growth should be challenged and changed. After 2038 will the process just happen again with more land being developed? 	Consider specific wording change and opposition to long term growth through policy 1.
21091 Saving Swainsthorpe Campaign	Object	Partial and lacking conviction. Statements and actions within plan are contradictory	Consider view that statements are partial and contradictory through on policy 1.
21269 Lanpro Services via Stephen Flynn + 21384 Glavenhill Ltd via Stephen Flynn	Comment	<ul style="list-style-type: none"> General support However 9% allocations in small village clusters is incompatible with climate change ambitions as will increase private car use and journeys. 	Note general support and consider view that village clusters approach contradicts climate change goals through policy 1.
21309 Public	Comment	<ul style="list-style-type: none"> Only doing minimum to ‘promote’ sustainable behaviour Need to prioritise and follow IPCC warnings All policies should contribute to stopping climate change emissions and provide greener living, all other considerations are a luxury 	Note view that the plan does not do enough to address climate change.
21343 Reedham PC	Comment	<ul style="list-style-type: none"> Allocations in village clusters is contrary to climate change statement due to required car/delivery vehicle use Why no policy on design of new houses and need for buildings to be to highest possible environmental standards 	Consider the view that the village clusters approach contradicts climate change goals through policy 1 and the

			comments on design when reviewing policy 2.
21448 Public	Comment	Reassurance that there is an awareness of all the greenhouse gases we need to control notably anaesthetic gases are serious greenhouse pollutants and may require careful management	Note view, taking account of the scope of land use planning.
21464 Bergh Apton PC	Comment	<ul style="list-style-type: none"> • 1,200 new homes (Minimum) + 400 windfall dwellings in SN will mean climate change statement cannot be met due to private car use requirements. • Plan projects to 2038, likely effects of climate change will be greater by then • Should be 'encouraging sustainable travel on all new developments within the county' – NCC Environmental Policy 	Consider the view that the village clusters approach contradicts climate change goals through the policy 1.
21703 The Woodland Trust	Object	<ul style="list-style-type: none"> • Policy wording should be stronger in light of climate emergency. • GI is included with no mention of trees and woods ability to sequester carbon from the atmosphere more efficiently and cheaply than mown grass. • Trees help adapt to impact of climate change e.g. reducing midsummer temperatures in urban areas. • Surface water flooding reduction is mentioned without reference to trees which reduce run off water into drainage systems by up to 60% (University of Manchester Research) 	Consider the view that more focus is required on climate change, in particular on trees, through the review of the statement and policy 3.
21710 Public	Support	Support projects which help with climate change e.g. planting new trees need to address air pollution from commercial and domestic. Total ban on bonfires on building sites and gardens & ban on burning non-smokeless fuel from chimneys	Note support, taking account of the scope of land use planning.
21726 Brown & Co	Support	<ul style="list-style-type: none"> • Support • Honingham Thorpe settlement would seek to be carbon-neutral, predicated on The Garden City Principles. • Services and facilities will be available in the village centre, lessening the need for travel. 	Note support and view that a new settlement at Honingham Thorpe could contribute to achieving the aims set out in climate change statement.

		<ul style="list-style-type: none"> • The design will take advantage of passive solar gain, with climate resilience embedded into homes and the community • Sustainable drainage methods will be included as part of multi-functional GI network • Land will be provided for food production and flexible employment space • Will enhance public service provision to provide sustainable transport to the city centre 	
21730 RSPB	Comment	<ul style="list-style-type: none"> • No mention of reduced flows in rivers and potential impact on water resource and protected habitats caused by increased water demands during hotter, drier weather • Consider construction of storage reservoir as a water supply which provides recreation & Biodiversity buffer, potential source of irrigation of arable crops • Greater aspiration needed to realise climate targets 	Note views on water resources, habitat protection and the potential need for a reservoir particularly through policies 3 and 4. In relation to a reservoir, review the approach set out in Anglian Water's water supply plan.
21805 Dickleburgh and Rushall PC	Object	<ul style="list-style-type: none"> • No strategy to identify carbon footprint of the Plan • Nor to ensure the ongoing impact of newly built homes and infrastructure are mitigated against • what will the environmental impact of the buildings be? • What are the calculated CO2 emissions and environmental cost of the process? • What requirements are there to mitigate these impacts? • What money will be used to help mitigate this environmental impact? CIL is meant for infrastructure/community support. • Parish Council proposes; • Offsetting at point of build – carbon assessment (tCo2e) for all new build projects which is shared to local communities. Clear identification of carbon-offset strategy to be given before receiving consent. 	Note the broad range of comments and suggestions made on climate change issues when reviewing the relevant policies and the statement. In particular, taking account of the role of a land use planning document, consider whether the draft plan's proposed approach to monitoring, energy efficiency and biodiversity net gain should be amended in the light of the proposals for offsetting.

		<ul style="list-style-type: none"> • Strategic Offsetting A – GNLP assesses tCo2e cost of implementing GNLP in full. Mitigate this with SN GNLP Woodland, could be series of smaller woodlands. • Strategic Offsetting B – as A but with a single large public woodland. • Strategic Offsetting C – as A but woodlands planted in all affected parishes and managed by Parish Councils. 	
21820 Barford & Wrampingham PC	Object	Allocations to Village Clusters contradicts climate change goals in relation to transport, loss of greenfield etc	Consider view that village clusters approach contradicts climate change goals through policy 1.
21831 Natural England	Support	<ul style="list-style-type: none"> • Support measures outlined in Table 5 & recognition of GI • request to identify policies which negatively impact on climate issues, and how these can be mitigated against 	Note support and consider identifying policies which negatively impact on climate issues and how these can be mitigated.
21939, 22901, 22933, 22953, 22988, UEA Estates & Buildings via Bidwells	Support	<ul style="list-style-type: none"> • Supportive of aims and design principles • UEA is a leader in field of environmental research and will apply its successes to the proposed developments. • Design principles will be applied where viable and achievable to proposed sites. 	Note support and conformation of UEA's positive role in addressing climate change issues
21964 Welbeck Strategic Land III LLP via Bidwells	Support	<ul style="list-style-type: none"> • Support – considered to provide framework to ensure communities developed and infrastructure delivered will be resilient to impacts of climate change • Principles are capable of being delivered/supported by proposed development 	Note support
21981 South Norfolk Green Party	Object	<ul style="list-style-type: none"> • How are allocations in village clusters justified with regard to climate change targets as will necessitate additional journeys contrary to measure 2&3 of climate change statement. • Little detail on housing design in policy, should insist on a detailed carbon assessment and being built to highest environmental standards beyond Government's minimum standards. 	Note the broad range of comments and suggestions made on climate change issues when reviewing the relevant policies and the statement. In particular, taking account of the role of a land use planning document,

		<ul style="list-style-type: none"> • Town and Country Planning Association Climate document advises in para 4.5.1 Local plans need policies which secure radical reductions in CO2 emissions and have an effective monitoring regime to ensure the progress of these reductions which are recorded in annual monitoring reports. • Methodology to ensure this is not mentioned, nor are CO2, Particulate matter that come off tyres and exhaust and NO2 gas. • Online air monitor at Castle Meadow show increase in pollution levels in last 2 months on last year's figures. • GI is mentioned but no mention of urban tree planting, or any urban planting, to mitigate increasing pollution • More specifics would be useful e.g. city of London current best practice for using GI to reduce public exposure to road transport pollution - https://www.london.gov.uk/sites/default/files/green_infrastruture_air_pollution_may_19.pdf • and University of Surrey's guide Implementing Green Infrastructure for Air Pollution Abatement: General Recommendations for Management and Plant Species Selection; https://figshare.com/articles/Considerations_regarding_green_infrastruture_implementation_for_improved_air_quality/8198261/3 • Tree planting to be encouraged, NNDC has pledged to plant trees but nothing found for other councils • Timeline and specific targets needed e.g. public buses and taxis to be electric & charging system like London's for polluting vehicles using a low emission zone in the city. • FOE say SN should aim to improve current 16% commuter journeys by public transport, cycling, walking to 40% and give Norwich target of 70% by 2030. 	<p>consider whether the draft plan's proposed approach to monitoring and on energy, design and infrastructure should be amended.</p>
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		<ul style="list-style-type: none"> • Cars need to be shared as much as possible, only 11% commuters share car in Norwich Area. According to Liftshare best in class employers have 40% staff sharing work journeys. • No mention of renewable energy generation. • Norwich area has 7MW of renewable power, SN has 63MW, if matched with best of similar local authority areas would be 29MW and 251MW, this is minimum target to be achieved rapidly. • FOE recommends councils identify a councillor at cabinet level and a lead officer as climate and nature champions who are required to publish bi-annual independent and audited reports to public on progress in meeting climate change and nature targets. • consider FOE recommendations to secure resources to invest in required changes to restore nature and meet climate goals; • legal and planning mechanisms e.g. 106 agreements to fund climate actions and nature restoration projects. • Raise money from UK Municipal Bonds Agency for low carbon infrastructure. • Workplace Parking Levy places modest charge on employers providing 11 or more parking places and invests the revenue in sustainable transport measures e.g. tram routes, electric buses, cycling and public transport smartcards. 	
22018 Mulbarton PC	Object	<ul style="list-style-type: none"> • Allocations in village clusters is contrary to climate goals due to travel. • Mulbarton has no secondary education, employment or services and goods deliveries so travel would be needed 	Consider view that village clusters approach contradicts climate change goals through policy 1.
22093 Watkin Jones Group	Support	<ul style="list-style-type: none"> • Support for creating a vibrant, inclusive area enhanced by new homes, infrastructure and environment • WJG aspire to the ambitions of the GNLP 	Note support
22128 + 22694 + 22785	Support	M Scott Properties is passionate about need to address Climate Change and supports the Climate Change Statement at Para 141.	

M Scott Properties Ltd via Strutt & Parker LLP			
22184 Environment Agency	Comment	<ul style="list-style-type: none"> • Support statement • Should refer to protecting habitats that are currently stores of carbon using environmental enhancement opportunities to increase storage of carbon e.g. rewetting appropriate habitats and tree planting 	Note support and consider proposed amendments on carbon stores.
22241 ClientEarth	Comment	<ul style="list-style-type: none"> • Welcome many of the objectives but unclear why they aren't given strategic policy status to ensure their consideration in planning applications. • To be effective monitoring indicators need to specify yearly targets that have been assessed in the policy development process to meet relevant emission reduction targets – on a number of themes this is not achieved; sustainable transport, renewable energy, capacity and GI 	Consider whether a single climate change policy would be appropriate and whether the draft plan's proposed approach to targets and monitoring should be amended.
22275 Landstock Estates Ltd & Landowners Group Ltd via Barton Willmore	Comment	<ul style="list-style-type: none"> • Support statement, particularly need to reduce travel by private car and need to keep development close to services and jobs • However the strategy fails to do this – it rolls forward previous allocations as opposed to identifying locations with greatest access to facilities via a services and facilities audit. • The audit should inform hierarchy of sustainable locations against which developments should be targeted, the A11 corridor, Cambridge Norwich Tech Corridor, ones with cycle facilities into Norwich and access to railway stations are more likely to achieve shift away from cars. 	Note broad support and consider view that the strategic approach contradicts climate change goals through policy 1.
22397 Norwich Green Party	Object	<ul style="list-style-type: none"> • warm words but not integrated to policies e.g. homes, strategic transport • inconsistencies between statement, evidence base and policies • Merely carries on as before • No climate change policies, no targets or quantification 	Note comments when reviewing the relevant policies and the statement. In particular, consider whether a single climate change policy would be appropriate and whether the draft plan's proposed approach to targets and monitoring should be amended.

		<ul style="list-style-type: none"> • SA shows the CC objective will not be met in most cases e.g. DEFRA target in Clean Air Strategy for 30% transport emissions reduction by 2030 • Setting a carbon budget which cannot be exceeded is the way forward 	
22486 Highways England	Comment	<ul style="list-style-type: none"> • Welcome opportunity through land use policy to reduce need to travel. • Maximising opportunities like remote working will reduce capacity pressures on strategic road network. • Policies should be flexible to adjust to changes in government policy, infrastructure needs and innovation like electric vehicles and provide measures/indices to monitor delivery with stretched targets. • The referenced policy documents will likely change over the plan period. • This link to Rising to the Climate Crisis - A Guide for Local Authorities on Planning for Climate Change (2018) is not available. 	Note comments when reviewing the relevant policies and the statement. In particular, consider whether more flexible policies can be provide and comments on referencing and link.
22514 Broadland Green Party	Comment	<ul style="list-style-type: none"> • Good reference to ‘Rising to Climate Crisis...’ document but needs to be more present throughout strategy. • Para 140 does not meet NPPF requirement to set strategic policy to address climate change – a comprehensive Climate Change Policy with practical applications in needed. • In report to Sustainable Development Panel, Norwich CC 15.1.20 the Director of Place commented <i>“There is a disconnect between the vision, objectives and climate change statement and the actual policy substance needed to enable the plan to contribute significantly to the delivery of a low carbon future.”</i> • Table 5 refers to coverage of climate change issues and the ambition to reduce emissions. More than ambition is needed, pro-active measures and monitoring of trends needed to ensure strategy works and targets are met. • SA methodology for assessing carbon emission in box 2.2 has both scenarios increase emissions but the need is to reduce emissions. 	Note comments on climate change issues when reviewing the relevant policies and the statement. In particular, consider whether a single climate change policy would be appropriate and whether the draft plan’s proposed approach to targets and monitoring should be amended.

Carbon footprint needs significant reductions to meet national obligations.

- In 2019, carbon budgets were produced for every UK local authority area with the support of the Tyndall Centre at UEA, known as SCATTER models, based on a UK budget calculated using climate equity principles from the Paris Agreement. A summary of the aggregated SCATTER budget for the Greater Norwich local authorities is given below:

	Broadland	South Norfolk	Norwich	GNDP
Remaining CO2 budget 2020 – 2100 (MtCO2)	4.5	4.9	3.4	12.8
Budget expires at current (2017) burn-rate	2027	2026	2027	2027
CO2 annual reduction rate from 2020	>13%	>14.2%	>12.7%	>13.4%

- To meet UK’s Paris Agreement obligations carbon emissions in GNDP area need to reduce by average of 13.4% per year, continuing at current rate will mean using up our budget by 2026/27
- GNLP aspirations are positive but more is needed, our suggestions are;

		<ul style="list-style-type: none"> • zero carbon development through building design to deliver highest viable energy efficiency – Passivhaus standards etc • Re-use of buildings and recycling building materials • Minimise waste production • Energy recovery • Promotion of decentralised energy through encouraging community-led initiatives such as promotion of decentralised renewable energy • Reduce need to travel, particularly private car use, secure highest possible share of trips made by sustainable travel. • Encourage development that promotes use of sustainable transport • develop more integrated transport system with new technologies and promote active travel and smarter choices • secure land for local food sourcing and promote allotments. • No clear strategy for required behavioural change to turn awareness into action. • Recommend implementing ‘next steps’ identified in 2008 Climate Change for Norfolk report; establish wider climate change partnership for Norfolk, with Sector Groups to address strategic priorities with clear governance and performance management to ensure delivery, develop Behaviour Change Strategy, including plans for community engagement. 	
22629 M Scott Properties Ltd via Bidwells	Support	<ul style="list-style-type: none"> • Support – considered to provide framework to ensure communities developed and infrastructure delivered will be resilient to impacts of climate change 	Note support
22724 Halsbury Homes Ltd via Pegasus Group	Comment	<ul style="list-style-type: none"> • Support and agree with approach to development and is confident site at Land off Norton Road, Loddon will assist in meeting these aspirations. 	Note support and views on site in Loddon

		<ul style="list-style-type: none"> Loddon has direct bus link to Norwich City Centre offering sustainable travel options to major employment hubs and recreation/leisure destinations 	
22761 Public	Object	<ul style="list-style-type: none"> Support CPRE that GNLP must assist move to post carbon economy and protect/enhance environmental assets. This will not be possible with current housing targets & Allocations which increase car use Concerned by lack of housing design requirements. Both overall energy used by developers should be reduced and percentage of green energy being used should increase Interdependence of everyday life is more complicated as highlighted by coronavirus emergency, more analysis is needed to confirm a plan as sustainable – many factors have not been considered Plans should reverse the negative effects on countryside, village and town life to improve quality of life for residents thus making plan sustainable 	Note views on climate change issues when reviewing the relevant policies and the statement.
23072 Orbit Homes via David Lock Associates	Support	<ul style="list-style-type: none"> welcomed and supported however it relies on right type of development in right places. Scale of new settlements offers potential to plan comprehensively to meet all sustainability requirements which can't be met in small & medium scale sites. SGV would contribute to climate change statement given potential for modal shift to public transport and commitment to creating NetZero development from outset. 15%housing to SN villages will not support sustainable transport options not facilitate investment in renewable/low carbon energy regeneration. Unallocated housing in SN should be met with SGV 	Note support and view that a garden village should replace some of the village cluster growth in South Norfolk. Consider through policies 1 and 7.
23132 Hopkins Homes via Bidwells	Support	<ul style="list-style-type: none"> Support – considered to provide framework to ensure communities developed and infrastructure delivered will be resilient to impacts of climate change 	Note support

QUESTION 13

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 13 - Do you support the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?
TOTAL NUMBER OF REPRESENTATIONS:	88 (64 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	22 Support, 33 Object, 33 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
12571	Support	Support settlement hierarchy and the proposed distribution of housing. However, it is not clear why new settlements have been identified as reasonable alternatives, including for Wymondham. The new settlement option is not part of the development strategy for GNLP, and the difficulties associated with the delivery of new settlements has been highlighted in the Growth Options 2018 document, the New Settlements Topic Paper 2018, and the Interim Sustainability Appraisal 2018 e.g. long lead-in times, and inability to deliver policy compliant levels of affordable housing in initial phases of development.	Note: <ul style="list-style-type: none"> • support for the hierarchy overall • questioning of the inclusion of new settlements as reasonable alternatives taking account of delivery issues and limited affordable housing in early phases.
12580, 12595 Bidwells for Hopkins Homes,	Support	The proposed Settlement Hierarchy is supported; the Norwich Urban Area, including the fringe parishes such as Old Catton and Sprowston, is clearly the most sustainable	Note support for the hierarchy, particularly the role of fringe parishes such

Persimmon Homes, Taylor Wimpey and Keir Living		location for growth, given the range of services available, and it is therefore appropriate to focus the majority of growth, including new allocations, here.	as Old Catton and Sprowston.
12845, 13417, 13421 + 13422 Bidwells and Bidwells for UEA Estates and Buildings	Support	<p>The proposed Settlement Hierarchy and the identification of the UEA as part of the Norwich Urban Area is supported. The UEA is a world class research university, being a leader in creative writing, life and environmental sciences. The presence of the UEA in Norwich has significantly contributed to Norwich’s recent economic, social and cultural growth. The UEA’s presence has enabled Norwich to attract many young, skilled workers to the area and, importantly, helped retain them locally.</p> <p>Therefore, the UEA support the scale of growth directed to the Norwich Urban Area, including 4,395 new dwellings. Development on GNL0133-C and GNL0133-E will help to support and meet a particular area of housing growth in the Norwich Urban Area.</p>	<p>Note support for the hierarchy, particularly:</p> <ul style="list-style-type: none"> • the role of UEA in supporting economic, social and cultural growth; • the scale of growth in the urban area; • sites providing for student accommodation at UEA.
13254 Strutt and Parker LLC for M Scott Properties	Support	<p>The preferred option for the Local Plan combines the concentration of the majority of development in and around Norwich and on the Cambridge to Norwich Tech Corridor, a large focus on market towns, with an element of dispersal to villages. This approach is supported and provides a balance across a range of the objectives of the Local Plan.</p> <p>This approach would see housing commitments providing a total minimum deliverable commitment of 6,342 within the Main Towns over Plan period of 2018 to 2038.</p> <p>The settlement hierarchy’s recognition of the contribution that the Main Towns like Diss make to the delivery of housing is acknowledged and supported. While it is acknowledged that Norwich should be the principal focus growth, the market towns have an important role in creating a vibrant sub-region, and in the case of Diss serve wide hinterlands from which people are drawn to use the town’s shops, services, and</p>	<p>Note support for the hierarchy, particularly the:</p> <ul style="list-style-type: none"> • Overall approach with focus on Norwich urban area + tech corridor; • Amount of growth in towns, especially Diss; • Approach to village clusters.

		<p>facilities, including both primary schools and secondary schooling as well as the train station.</p> <p>In addition to the above, the preferred settlement hierarchy follows a typical approach and looks at the different levels of services between places, we support the clustering of villages within the countryside and believe this recognises that in some cases, existing businesses within the villages provide services not only for the village that they are located in, but also for smaller neighbouring settlements which may rely on the services they provide.</p>	
13303 Norwich Liberal Democrats	Support	Support the continuation of the settlement hierarchy as defined in the JCS with the primary focus of planned development in the Norwich urban area.	Note support for the hierarchy, particularly the primary focus on the Norwich urban area.
22254 Carter Jonas LLP for Taylor Wimpey Strategic Land	Support	The proposed settlement hierarchy and the proposed distribution of housing, as set out in Policy 1, is supported.	Note support for the hierarchy.
13356 Breckland District Council	Support	We support the development strategy proposals and in particular that no new settlements are proposed at Honingham Thorpe, Hethel and Silfield. However, we would welcome the opportunity to engage with GNLP were these proposals to come forward in the future.	Note support for non-inclusion of new settlements at this time
13369 Bidwells for M Scott Properties Ltd	Support	The proposed Settlement Hierarchy is fully supported. Norwich and the Norwich Fringe, which includes Taverham, is the most sustainable location within the Greater Norwich area and is the focus for significant economic growth. Norwich is the catalyst for economic growth in the area and provides a range of amenities, services and infrastructure to support sustainable housing. Accordingly, it is wholly appropriate and consistent with Government Guidance that it should be identified as the preferred location to accommodate 69% of the housing growth during the period to 2038. The identified Settlement Hierarchy will also ensure consistency with the draft Local Plan's Climate Change policy.	<p>Note support for the hierarchy, particularly the:</p> <ul style="list-style-type: none"> • primary focus on the Norwich urban area including Taverham. • support it provides for climate change policy.

13401 Strutt and Parker LLP	Support	<p>The preferred option for the Local Plan combines the concentration of the majority of development in and around Norwich and on the Cambridge to Norwich Tech Corridor, a large focus on market towns, with an element of dispersal to villages. This approach is supported and provides a balance across a range of the objectives of the Local Plan.</p> <p>This approach would see housing commitments providing a total minimum deliverable commitment of 6,342 within the Main Towns over Plan period of 2018 and 2038.</p> <p>The settlement hierarchy's recognition of the contribution that the Main Towns like Diss make to the delivery of housing is acknowledged and supported. While it is acknowledged that Norwich should be the principal focus growth, the market towns have an important role in creating a vibrant sub-region, and in the case of Diss serve wide hinterlands from which people are drawn to use the town's shops, services, and facilities, including primary schools, and a secondary school.</p>	<p>Note support for the hierarchy, particularly the:</p> <ul style="list-style-type: none"> • Overall approach with focus on Norwich urban area + tech corridor; • Amount of growth in towns, especially Diss.
13404 Strutt and Parker LLP	Support	<p>Agree in relation to Diss - Our client, Peter Rudd, has an interest in a site at Diss that is proposed for allocation (policy GNLP0250/0342/0119/0291). Diss is identified as a main town, which falls within the second tier of the settlement hierarchy. We agree with this ranking for Diss and the proposed distribution of housing to that settlement, which we note is expressed as a minimum.</p>	<p>Note support for the amount of growth in Diss and the expression of housing numbers as a minimum.</p>
13416 Bidwells	Support	<p>We strongly support the principle of the Settlement Hierarchy and the identification of Horsham St Faith and Newton St Faith as a village cluster in the draft GNLP. The cluster benefits from a Post Office and Store, pre-school, primary school, doctor's surgery, public house, alongside a range of other services and amenities.</p> <p>Accordingly, the identification of Horsham St Faith and Newton St Faith, which is in close proximity of Norwich and the NDR, as a village cluster supports the aspirations of directing growth to locations with good access to services and employment, alongside urban and rural regeneration.</p>	<p>Note support for the hierarchy, particularly the identification of Horsham St Faith and Newton St Faith as a village cluster with good access to services.</p>
13420	Support	<p>Overall, the proposed distribution of growth, including the focus on the area around Norwich, is considered to be the most appropriate strategy, and is supported.</p>	<p>Note support for the hierarchy, particularly the</p>

Savills for Barret David Wilson Homes			primary focus on the Norwich urban area.
13425 Pegasus Planning Group for Barrett David Wilson Homes	Support	<p>Our client supports the Councils' approach to focussing growth based on the hierarchy of settlements in the Greater Norwich area.</p> <p>The densification of sites that have already been identified to accommodate housing will maximise the use of existing social and transport infrastructure and minimise disruption to existing communities.</p> <p>At the top of the Sustainable Growth Strategy hierarchy is the Norwich urban area, which includes the fringe parish of Cringleford. Within this parish 1,200 homes were allocated through the Cringleford Neighbourhood Plan and consent has been granted for 1,300. As part of the Greater Norwich Local Plan an uplift of 360 homes is proposed across two sites (GNLP0307 and GNLP0327).</p> <p>Both these sites have a combined net developable area of approximately 13.5ha, which would result in a net density of only 26 dwellings per hectare (dph) if the uplift in the number of new homes were restricted to only 360. The figure of 26dph is well below the average density of 44dph that has been approved on the Newfound Farm site and would not accord with paragraphs 122 and 123 of the National Planning Policy Framework 2019 (NPPF) that require planning policies to ensure the efficient use of land and identify the importance of avoiding homes being built at low densities, especially in sustainable locations.</p> <p>We have submitted evidence through the Site Allocations consultation to demonstrate that the remainder of the BDW site at GNLP0307 has the capacity to deliver approximately 500 homes and that the potential delivery at this site should be increased accordingly.</p>	<p>Note support for:</p> <ul style="list-style-type: none"> • the hierarchy, particularly the primary focus on the Norwich urban area; • further densification at site GNLP 0307 in Cringleford to provide 500 homes.

<p>13429 Bidwells</p>	<p>Support</p>	<p>The proposed Settlement Hierarchy and the identification of Hingham as a Key Service Centre is fully supported.</p> <p>Hingham is a location which has a range of services and amenities to support day to day life, including a primary school, Co-op Food Store, White Hart Pub, library, a doctors' surgery, alongside a range of employment uses.</p> <p>Accordingly, the identification of Hingham as a Key Service Centre supports the GNLP's aspirations of focusing growth in locations with access to jobs and services, whilst supporting a vibrant rural economy.</p> <p>In addition, the suitability and sustainability of Hingham for growth has been demonstrated through Abel Homes delivery of The Hops, a development of 88 dwellings. The Hops, which was allocated under Policy HIN 1 of the Adopted Development Plan, had a delivery rate of three and a half years (from submission of planning application to completion.).</p> <p>Therefore, we support the scale of growth (8% of total housing growth) directed to the Key Service Centre. If required, Key Service Centres have the potential to accommodate additional growth if they cannot be accommodated in other locations within the settlement hierarchy.</p>	<p>Note</p> <ul style="list-style-type: none"> • support for the hierarchy, particularly the identification Hingham as a Key Service Centre with good access to jobs + services supporting a vibrant rural economy; • evidence of recent good delivery of 88 homes at the Abel Homes site (The Hops).
<p>13431 David Lock Associates for Orbit Homes</p>	<p>Support</p>	<p>We support the proposed settlement hierarchy and it is logical for the Norwich Urban Area and the main towns to be the focus for growth.</p> <p>A clear vision and objectives for the Greater Norwich Area are articulated in the Plan and there is a significant opportunity over the Plan period for the area to flourish and attract significant growth and investment and become a nationally important</p>	<p>Note support for the overall hierarchy and the plan's vision and objectives.</p>

		destination in terms of fulfilling an economic and educational, as well as tourism role within the UK.	
13435 Bidwells for Hopkins Homes	Support	The proposed Settlement Hierarchy is strongly supported; it is recognised that The Norwich Urban Area and Main Towns, such as Aylsham, provide a range of services and amenities and are, therefore, the most sustainable and suitable locations for the majority of growth within the Greater Norwich Urban Area.	Note support for the hierarchy, particularly the overall approach with the focus on the Norwich urban area and main towns, especially Aylsham.
13373 Swainsthorpe PC	Support? (content suggests object)?	<p>We supported the continuation of the settlement hierarchy as defined in the JCS. We wonder why and where the concept of “village clusters” has been introduced into the planning process. For many reasons they appear to be a flawed unsustainable concept. A real strength of the JCS was its inclusion of a Norwich Policy Area and Rural Policy Areas, and therefore we are very disappointed that this distinction has been abolished. The Rural Policy Areas gave real protection to the countryside: this is threatened by the introduction of the village cluster approach. This is another example of how the Draft GNLP contradicts the existing agreed Local Plan.</p> <p>As noted above in our response to Q1 CPRE Norfolk has serious misgivings about the separation of the sites and allocations for new housing in the South Norfolk Village Clusters from the rest of the GNLP and its current consultation. In addition, we strongly object to the use of the open-ended statement that these South Norfolk “village clusters” will be allocated a “minimum” of 1,200 houses, rather than giving a maximum number as is the case for the Broadland “village clusters”. If the reason for this separation is, as was given at the recent GNLP meeting of 6th January 2020, the lack of suitable sites coming forward in these South Norfolk “village clusters”, then this gives another good reason why the delivery of housing should be phased. Clearly the sites included in the JCS have undergone rigorous assessment and their inclusion in the Local Plan is an acknowledgement of their suitability for development. It makes absolute sense that these suitable sites should be developed first especially given the fact that any new sites coming forward are deemed to be unsuitable.</p>	

	<p>Paragraph 163d states that the strategy for location of growth “focusses reasonable levels of growth in the main towns, key service centres and village clusters to support a vibrant rural economy, before suggesting that the approach to “village clusters” is “innovative”. The claim that providing new housing in such locations will support services is, we contend, largely illusory. Instead, additional new housing will lead to more car and delivery vehicle journeys, with residents travelling longer journeys to access the services they require such as health services and a supermarket. Given that the majority of any such new houses will be larger family homes, with children just or more likely to be of secondary or tertiary school or college age than of primary school age. This will have further impacts on carbon reduction due to the additional journeys needed to secondary schools or colleges.</p> <p>It is clearly demonstrated in the table on page 80 of the 23 June 2017 GNDP Board Papers that the most reasonable option for the distribution of housing in terms of the environment (e.g. minimising air, noise and light pollution; improving well-being; reducing CO2 emissions; mitigating the effects of climate change; protecting and enhancing biodiversity and green infrastructure; promoting the efficient use of land; respecting the variety of landscape types in the area; ensuring that everyone has good quality housing of the right size; maintaining and improving the quality of life; reducing deprivation; promoting access to health facilities and healthy lifestyles; reducing crime and the fear of crime; promoting access to education and skills; encouraging economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintaining and enhancing town centres; reducing the need to travel and promoting the use of sustainable transport modes; conserving and enhancing the historic environment and heritage assets; minimising waste generation; promoting recycling; minimising the use of the best agricultural land; maintaining and enhancing water quality and its efficient use) is Option 1: urban concentration close to Norwich. In terms of all these factors taken together the least desirable option as shown on this chart is Option 4: dispersal. We therefore strongly support urban concentration in and close to Norwich as the way forward, because it is best for the environment, minimising climate change and the well-being of residents.</p>	
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		<p>There is very little economic evidence to suggest that cementing new housing estates on the edges of villages will bring any boost to local services, but rather they will put a strain on these services, where they exist.</p> <p>We cannot understand why the table showing the same set of factors in the Interim Sustainability Appraisal for the GNLP on page 42 shows some different results from the table on page 80 of the 23 June 2017 GNDP Board Papers. While the most recent table confirms that overall urban concentration is a better option than dispersal, it is even clearer in the earlier version. The table on page 42 shows that urban concentration is better than dispersal in terms of: minimising air, noise and light pollution; improving well-being; reducing CO2 emissions; mitigating the effects of climate change; protecting and enhancing biodiversity and green infrastructure; encouraging economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintaining and enhancing town centres; reducing the need to travel and promoting the use of sustainable transport modes. However, in terms of some of the other factors it seems that changes have been made to the table so that several options appear to be equal in terms of impacts, instead of showing what the earlier table demonstrated, which is that concentration was the best option and dispersal the least reasonable option.</p> <p>Given the clear benefits and advantages from these documents for the environment, climate change and other areas, as well as other reservations around lack of sustainability and issues of delivery, we strongly urge the GNDP to remove the requirement for additional new sites for housing in the “village clusters” from the GNLP.</p>	
15541	Comment	<p>The settlement hierarchy does not seem to recognise the distinctly rural nature of many parts of Norfolk, it does not acknowledge the need to preserve it, or its huge environmental value enhancing the quality of life for everyone in Norfolk. The entire plan is based on growth in jobs and growth in housing. There should be some areas in which this growth should not be considered a vital necessity!</p>	<p>Need for hierarchy to recognise and preserve the rural nature and environmental value of many parts of Norfolk.</p>
11484	Comment	<ul style="list-style-type: none"> - Agree with settlement hierarchy and broadly agree with distribution of housing - Support identification of Wymondham as a main town 	<p>Note:</p>

		- Argument for greater proportion of total housing growth to be steered to the towns	<ul style="list-style-type: none"> • support for the hierarchy, including Wymondham's identification as a main town • view that more growth could be steered to the towns.
12344 Hempnall Parish Council	Comment	No summary	
12551 Wellbeck Strategic Planning	Comment	<p>The proposed Settlement Hierarchy is, in principle, supported. It is recognised that The Norwich Urban Area and Main Towns, such as Wymondham, are the most sustainable and suitable locations for the majority of growth within the Greater Norwich Urban Area.</p> <p>The quantum of growth directed to the Norwich urban area and the village clusters in South Norfolk cannot, without the provision of clear evidence relating to delivery, be relied on. Accordingly, a suitable proportion of this housing growth should be reallocated to alternative settlements within the settlement hierarchy, specifically the allocation of sites that would otherwise classed as contingency sites.</p>	<p>Note:</p> <ul style="list-style-type: none"> • support for the hierarchy, particularly the main towns such as Wymondham. • View that contingency sites should be allocated as there is not enough evidence of delivery, particularly for sites in the urban area and SN villages
12460	Comment	Agree that with the GNLP that Horsford should have no allocation of sites, other than GNLP0264. Horsford has been allocated 479 homes to date, which equated to 11.9% of	Note;

		the 9% total housing growth as identified by GNLP. I have reservations in regard to "village clusters", (Horsford falls in this group) would this mean that settlement boundaries redefined around the perimeter of these cluster villages which would mean that green field land is vulnerable to further development - and sites could be built on that are not suitable for development on the fringe of the village.	<ul style="list-style-type: none"> • Support for allocating only one new site in Horsford as existing commitment is high; • Reservations over village clusters approach making greenfield land on the edge of villages being vulnerable to development
12495	Comment	Policy 1 should be added to, to reflect para 160 explanatory text, to allow for 'small' brownfield site development which could be outside settlements. Definition of 'small' would also be useful.	Consider need to amend policy 1 to allow for small brownfield site development
12422 Bergh Apton Parish Council	Comment	<p>We are pleased that the greater part of the new GNLP developments will be in the Norwich area. Fortunately, Norwich has many brownfield sites available. Even more important, Norwich has the infrastructure and services to support development. For example; hospitals, universities, research parks, good schools, museums, entertainment facilities, public transport and so on.</p> <p>It is, therefore, of concern that South Norfolk are proposing 1200 additional dwellings by providing for estate development throughout the village clusters as well as an extra 400 small scale windfall houses. These would be in addition to the 1349 dwellings already allocated and would overwhelm infrastructure.</p>	<p>Note:</p> <p>Support for the hierarchy, including focus on Norwich urban area;</p> <p>Concern over amount of growth in SN village clusters.</p>
12437	Comment	No, following my direct discussion with Professor James Wood at Cambridge currently actively engaged in Cambridge -Norwich high tech links who is very positive about the programme. We have very strong links and hope that a lot of biotech will continue. His statement on housing needs now and future for this is that wealthy people will always	Note:

		source housing but no one is working to build the housing for the people who most need it, the minor technicians , veterinary nurses and innumerable support staff. Robust and well managed social housing schemes are the best way to provide this.	Support for growth potential of the tech corridor Concern over affordable housing provision
12448 Aylsham TC	Comment	Although at this stage it is not of direct interest to Aylsham and its residents there is a view that too much emphasis has been placed on school catchment areas rather than geographical links	Note concern that too much emphasis has been placed on school catchment areas rather than geographical links
Horsford PC	Comment	Accept that Horsford should have one new allocated site, GNLP0264, though have concerns over access. Horsford has been allocated 479 homes to date, which equated to 11.9% of the 9% total housing growth as identified by GNLP. Reservations over "village clusters": <ul style="list-style-type: none"> • Paragraph 132 claims that new quality development will be located so loss of green-field land is minimised. This can only be achieved by not allocating additional sites to Horsford or other clusters; • potential redefining of settlement boundaries making green field land susceptible to development. 	Note: Support for allocating only one new site in Horsford as existing commitment is high; Reservations over village clusters approach making greenfield land on the edge of villages susceptible to development; View that loss of greenfield land can only be minimised by not allocating in Horsford or other villages.

12939	Comment	<p>We supported the continuation of the settlement hierarchy as defined in the JCS. We wonder why and where the unsustainable concept of village clusters has been introduced into the planning process. A real strength of the JCS was its inclusion of a Norwich Policy Area and Rural Policy Areas, and therefore we are very disappointed that this distinction has been abolished.</p> <p>The Rural Policy Areas gave real protection to the countryside: this is threatened by the introduction of the village cluster approach. This is another example of how the Draft GNLP contradicts the existing agreed Local Plan.</p> <p>We therefore strongly support urban concentration in and close to Norwich as the way forward, because it is best for the environment, minimising climate change and the well-being of residents.</p>	<p>Note:</p> <p>Opposition to introduction of village clusters in hierarchy and support for JCS approach with NPA and RPAs</p> <p>Support for concentrating growth in and around Norwich</p>
13302 + 13305 Pegasus Group for Pigeon Investment Management	Comment	<p>Concern over the proposed spatial strategy of the emerging GNLP owing to its over reliance on housing delivery in the Norwich urban area and the proposed discrepancy in terms of settlement hierarchy between the quantum of housing allocated to Main Towns, Key Service Centres and Village Clusters.</p> <p>Putting 70% of the housing growth in the urban area places a requirement on existing infrastructure to accommodate an additional 30,560 dwellings, and an annual delivery rate 1,698 dwellings per annum over each of the next 18 years. This requires that the level of development in Norwich urban area alone is broadly consistent with that which has been achieved across the entire GNLP plan area since 2008. This does not appear to be realistic.</p> <p>If the necessary boost to housing supply is to be achieved this will require a greater range and choice of sites across all of the sustainable settlements within the plan area.</p> <p>Delivery on the urban area is predicated on two substantial brownfield regeneration areas, the Northern City Regeneration Area and the East Norwich Strategic Regeneration Area and several urban extensions of over 1,000 dwellings each.</p>	<p>Note concerns over:</p> <p>the amount of growth focussed on the urban area;</p> <p>deliverability of brownfield regeneration areas + urban extensions (soundness issue);</p> <p>no trajectories produced yet;</p> <p>boost to housing supply requiring a greater range and choice of sustainable sites across the plan area;</p>

		<p>Brownfield regeneration is costly and time consuming. The likelihood of the totality of development proposed through regeneration delivering in the plan period is slim.</p> <p>New strategic urban extensions can also be timely to deliver (highways + drainage issues).</p> <p>The Councils have not produced evidence to substantiate the delivery trajectory of the brownfield regeneration sites or the urban extensions in the Norwich Urban Area. We reserve the right to comment further on this matter at the Regulation 19 consultation stage. Delay in delivery at either source of supply could prejudice the delivery of the housing requirement of the GNLP and therefore go to the soundness of the plan.</p> <p>Additional certainty could be achieved by changing the emphasis of the spatial strategy by allocating more housing to the Main Towns, including Wymondham, and the Key Service Centres with an associated reduction in the percentage to be delivered in Norwich urban area and the Village Clusters.</p> <p>Additionally, we have concerns over the fact that more dwellings are proposed in the spatial strategy across Village Clusters than are allocated at Key Service Centres, including a minimum of 1,200 dwellings through a South Norfolk Village Clusters Housing Site Allocations Development Plan Document.</p> <p>Without certainty over the supply of land to deliver such a quantum of development in South Norfolk Village Clusters the soundness of the spatial strategy is questionable.</p> <p>A Settlement Hierarchy approach to the distribution of development would look to allocate a higher percentage of housing to more sustainable locations with smaller amounts being allocated to lower order settlements in recognition that small</p>	<p>more allocations required in main towns + KSCs, fewer in urban area + village clusters;</p> <p>no certainty over the supply of land to deliver development in South Norfolk Village Clusters (soundness issue); housing need below minimum set by national policy + does not take account of the needs of specific groups;</p> <p>The 12% of housing allocations does not equate to 12% of the housing requirement as required by the NPPF;</p> <p>Land at Rightup Lane, Wymondham may operate as two sites with different access arrangements, + should be considered as two separate small allocations.</p>
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		<p>developments at villages can help maintain service provision, provide vitality and help address local market and affordable housing needs.</p> <p>In failing to provide an increased number of dwellings at Main Towns and Key Service Centres the Councils are missing the opportunities presented by Pigeon to provide new community facilities that can support existing and proposed new development.</p> <p>The identified housing need does not accord with the minimum set by national policy and does not take account of the needs of specific groups.</p> <p>The quantitative elements of the Spatial Strategy will need to be revised to ensure that housing needs can be met across the GNLP area.</p> <p>This should be achieved through directing more growth to the Main Towns and Key Service Centres to counterbalance the disproportionate levels of growth proposed within the Norwich urban area and Village Clusters.</p> <p>Small and Medium sized sites Paragraph 68a of the NPPF requires that at least 10% of the housing requirement should be provided on small and medium sites of no larger than 1ha. This requires that 4,434 homes of the identified housing requirement for 44,340 homes is provided on such sites. However, as identified previously, the proposed housing requirement is insufficient to ensure that the actual housing needs will be met. It will therefore be necessary to increase the number of homes provided on small and medium sites accordingly.</p> <p>In paragraph 164 (6), the GNLP indicates that 12% of homes allocated are on small and medium sites. However, 12% of allocations does not equate to 12% of the housing requirement as required by the NPPF. It is therefore likely that it will be necessary to identify additional small or medium allocations to accord with national policy.</p>	
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		<p>The Land at Rightup Lane, Wymondham may operate as two independent sites with different access arrangements, such that these should be considered as two separate small rather than medium allocations. It has also been identified by Development Management officers in the Site Assessment Booklet that the Land at Rightup Lane is suitable for allocation subject to highways constraints being addressed, such that this would provide an appropriate site for allocation to address the existing shortfall in small or medium sized sites.</p>	
<p>13308 Armstrong Rigg Planning for Westmere Homes</p>	<p>Comment</p>	<p>Broadly agree with the hierarchy itself , with Aylsham classified as a “Main Town”.</p> <p>Concerns over distribution of growth, particularly:</p> <ul style="list-style-type: none"> • continued reliance on strategic sites in the urban area; • significant growth in South Norfolk’s Village Clusters. <p>The strategic sites issue is pertinent due to the chronic under-delivery of existing large allocations in the Norwich urban area - 2018/19 monitoring year first since the start of the JCS plan period delivery in the NPA has met requirements (data table provided).</p> <p>Lag in delivery due to significant lead in times for large-scale strategic sites. This will be replicated if the reliance on large sites in the Norwich urban area is maintained by the GNLP.</p> <p>The level of growth to then be directed to South Norfolk’s rural area raises two concerns:</p> <ul style="list-style-type: none"> • lack of evidence means strategy is neither justified nor demonstrably deliverable. • such a high level of growth in the rural area is entirely unsustainable 	<p>Note concerns over distribution of growth, particularly:</p> <ul style="list-style-type: none"> • continued reliance on strategic sites in the urban area (soundness issues); • significant growth in South Norfolk’s Village Clusters (soundness issues); • more allocations required in main towns, particularly Aylsham which has 3 good medium scale sites.

		<p>A higher proportion of the housing requirement should be directed to deliverable sites at the Main Towns. Aylsham in particular represents a sustainable settlement with at least three medium-scale deliverable housing options.</p> <p>The proposed housing figure will also require a significantly uplift to account for City Deal and Tech Corridor growth commitments.</p> <p>We therefore strongly suggest that the Main Towns should play a prominent role in meeting these additional needs. The identification of deliverable sites at the five Main Towns should be the priority due to the sustainability benefits these settlements offer, allied with their clear capacity to grow. These opportunities should then be complemented by additional sites across the remainder of the hierarchy in instances where it is clear development is deliverable and would result in wider sustainability benefits.</p>	<p>Also note concerns over amount of growth which will require a significant uplift to account for City Deal and Tech Corridor growth commitments</p>
Barton Willmore	Comment	<p>No. of homes should be consistent with housing need calculated by the Standard Method and then be increased to account for the Growth Deal, as advocated in the SHMA. This would also help make up for the shortfall against the GNLP to 2026.</p> <p>The proposed distribution of housing within the hierarchy is unjustified and would not deliver housing requirements.</p> <p>A number of “rolled forward” allocations are failing to deliver homes. E.g. Allocation GT6 (Land at Brook & Laurel Farm) has not yet commenced, despite permission being granted in June 2014. Work is yet to commence on Allocation GT11, and we note that planning permission has not yet been granted for the Larkfleet Homes site East of Broadland Business Park. Combined these sites are anticipated to deliver 1,450 homes. Accounting for the Nathaniel Lichfield & Partners “Start to Finish How Quickly do large scale housing sites deliver” (NLP November 2016) on average these sites would take 5.3 years to actually deliver houses, of which circa 13</p>	<p>Note view that:</p> <p>Overall housing numbers should be increased to account for the Growth Deal;</p> <p>Based on analysis of current progress, a number of “carried forward” housing sites (especially in the Growth Triangle) will not deliver in the plan period;</p> <p>The proposed dispersal should align more closely</p>

		<p>months would be post approval of planning. The lead in time for smaller sites below 500 units extends to circa 2 years from the grant of planning permission. Sites GT13, GT14, DRA1, HEL1 and REP1 fall into this category.</p> <p>The AMR provides no evidence of delivery or update on progress. As such to carry forward such allocations, the Authorities must (a) be confident (through the provision of clear evidence) that they will be granted planning permission and commence in the Plan period; and (b) be confident that sites GT6 and GT11 will start delivering units before 2028 given the average build out rates for sites of this size are identified by NLP to represent no more than 86 dwellings per annum on Greenfield sites and no more than 52 dwellings per annum on brownfield sites.</p> <p>In addition, Sites GT12 and GT16 are anticipated to deliver 3,500 and 3,000 dwellings respectively in the Plan period. To date neither have commenced despite being anticipated to deliver from 2019/2020 and 2016/2017 respectively. In the case of GT12, the latter phases are dependent on Infrastructure Forward Funding.</p> <p>Neither sites have secured detailed permission for any phase. Even if permission was to be granted now, accounting for NLP lead in times, they would not commence before 2021. This is ambitious, and even then would have to deliver housing at a rate of 220 dwellings per annum in the case of GT12, and 227 dwellings per annum in the case of GT16 (as set out in the AMR which anticipates no housing on site until 2024).</p> <p>NLP 2016, highlights average build out rates of 171 dwellings per annum on greenfield sites of this size, reducing to 148 dwellings per annum for brownfield sites. Based on these averages and the anticipated delivery rates in the 2018/2019 AMR, it would result in a housing shortfall of over 1,200 homes in itself.</p>	<p>with the Growth Strategy, including additional development in Wymondham, and a reduction in reliance of Sites in the Growth Triangle.</p>
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		<p>Accordingly, these allocations should be reduced to 2,927 (GT12) and 2,388 (GT16) respectively.</p> <p>The shortfall must be accounted for elsewhere.</p> <p>Further, we would highlight that the sites identified above are within the Growth Triangle, where there are clearly questions over deliverability. Allocating additional homes to the Growth triangle in the context of under-delivery on housing to date (a shortfall of 6,169 homes in the NPA), and uncertainty over delivery of sites, would further undermine confidence in the ability of the GNLP to deliver on its needs to 2038.</p> <p>In addition we note that Page 46 of the GNLP highlights uncertainty over the site of Carrow Works. This accounts for a further 1,200 homes. If there is uncertainty over delivery it should be removed from the Plan. Accordingly, accounting for Carrow Works, and the reductions to allocations GT12, and GT16 we have highlighted above, a further 2,400 need to be identified in the Plan to alternative locations, notwithstanding the additional housing we believe should be provided for in response to Question 9.</p> <p>We would also stress that Long Stratton is subject to 2no. Hybrid applications submitted Jan and Feb 2018 for 600 dwellings (213 detailed) and 1,275 dwellings (zero detailed) respectively.</p> <p>Both applications remain undetermined. Based on the NLP lead in times, it is unlikely either of these will deliver any houses before 2023/24 (accounting for 5.3 years for schemes of 500-999 dwellings and 5.7 years for schemes of 1,001 – 1,499 dwellings). Based on average build out rates of 86 dwellings per annum, it is unlikely all of the 1,800 homes can be delivered within the plan period to 2038, requiring a further adjustment.</p>	
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		<p>The distribution of housing should be adjusted. In addition, we strongly object to simply allocating 1,200 additional homes to South Norfolk Village clusters on the grounds of sustainable development. These 1,200 homes should be brought back into the GNLP.</p> <p>Together there is therefore a need to identify additional land for circa 4,000 homes as a minimum, which would increase to circa 13,000 further homes should growth from the New Deal be planned for.</p> <p>As set out in our March 2018 representations we endorse a strategic growth option which serves and supports an identified a Core Area whilst focusing and delivering development along the A11 corridor, fulfilling the Spatial Objectives of supporting the Cambridge to Norwich Tech Corridor plus locating growth near to jobs and infrastructure. We continue to advocate this approach which will fulfil the Vision and Objectives of the GNLP, whilst achieving the full potential of the Cambridge Norwich Tech Corridor in a sustainable way that is consistent with the Climate Change Statement. This area should be the focus of accommodating the above shortfall, and the Housing Growth Allocations and Policy 1 should be updated to reflect that.</p> <p>The proposed dispersal should align more closely with the Growth Strategy. As discussed above there are aspects of the current approach which need amending and will require additional new allocations to be identified. This should include locating additional development in Wymondham, one of the largest towns on the Cambridge Norwich Tech Corridor, and a reduction in reliance of Sites in the Growth Triangle in recognition of past poor delivery.</p>	
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<p>13340 Hopkins Homes</p>	<p>Comment</p>	<p>Whilst Hopkins Homes agrees with the broad strategy outlined, we do consider that a number of the existing villages within the wider Greater Norwich Area, both within and beyond the defined NPA benefit from sufficient sustainability credentials so as to be able to accommodate greater levels of housing growth than are currently proposed.</p> <p>Notably, Hopkins Homes have proposed sites on the periphery of the villages of Mulbarton and Scole within South Norfolk, both of which settlements benefit from facilities and good connections with nearby higher-order market towns which enable them to accommodate higher levels of growth than are currently envisaged through the proposed Strategy.</p> <p>In respect of Mulbarton, the existing population in excess of 3,500 is higher than that of over half of the designated Key Service Centres, as confirmed by the data contained in Table 1 on Page 11 of the Draft Plan, which therefore further confirms the appropriateness of higher levels of proportionate housing growth than currently proposed within the Draft Plan.</p>	<p>Note:</p> <p>Support for broad strategy</p> <p>View that more development could be focussed in villages;</p> <p>Sites available on periphery of Mulbarton and Scole.</p>
<p>22430 Gladman Developments</p>	<p>Comment</p>	<p>Settlement Tiers</p> <p>The continued identification of the Norwich Urban Area at the top of the settlement hierarchy is supported + it should accommodate the largest proportion of new development.</p> <p>The inclusion of Diss and Wymondham as Main Towns in the second tier of the settlement hierarchy is supported. Further development should therefore be directed towards both Diss and Wymondham through the GNLP.</p>	<p>Note view that:</p> <p>The overall hierarchy is supported;</p> <p>Costessey and Wymondham are supported for growth, but should be through allocations rather than as contingency;</p>

		<p>Gladman also supports the identification of Poringland as a “Key Service Centre”. Poringland represents one of the more sustainable settlements listed as a “Key Service Centre” in the draft settlement hierarchy. Proportionate development relative to the role and level of sustainability should be directed to Poringland.</p> <p>Distribution of Development</p> <p>General comments on Distribution</p> <p>Gladman consider that a mix of Options 2, 3 and 4 should form the basis of the distribution of growth adopted through the GNLP rather than Option 3, supporting the Cambridge to Norwich Tech Corridor, alone.</p> <p>Norwich Urban Area</p> <p>The Norwich Urban Area plays an integral role to achieving the economic ambitions of the joint Plan which should be responded to through the allocation of additional land for development.</p> <p>Gladman supports Costessey being identified for the 1,000 dwelling contingency. Costessey forms an integral part of the urban area, with strong public transport links into Norwich City Centre + access to the strategic road network. There are a wide range of existing services and facilities + local employment. Importantly, Costessey is located on the opposite side of the Norwich Urban Area to the strategic growth triangle, which is to experience significant levels of growth over the plan period. Costessey has relatively limited commitments and as such there is little to suggest that additional supply directed to the settlement would result in a saturated market and reduced housing delivery. Costessey therefore represents a suitable location at which further</p>	<p>Diss should have more growth</p> <p>Poringland should have additional growth beyond existing commitments</p> <p>The above are good locations for meeting potential shortfalls for the plan.</p>
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		<p>housing needs can be realistically be sustainably accommodated.</p> <p>Gladman however considers that the contingency site identified for Costessey is needed now and as such should be identified as an allocation for housing through the GNLP. Further homes are required in the Norwich urban area to respond to the extended plan period, as well as to capitalise on and secure the delivery of strategic economic objectives for the Norwich to Cambridge Technology Corridor. The Site should be allocated for housing now, to ensure that there is sufficient flexibility provided in the housing land supply to ensure full delivery of housing needs identified for the Norwich urban area should housing delivery at the Growth Triangle be lower than anticipated.</p> <p>Diss Only limited growth is identified for Diss through the GNLP. Supporting information advising highways constraints appears to be founded on a much higher level of growth than proposed and available. The role of new development in addressing broader constraints, such as school capacity, does not appeared to have been fully explored.</p> <p>The strategy for Diss fails to adequately support the sustainability of the town, or its role as a service centre for wider rural area. The limited growth does not support the retail offer. Diss forms the most appropriate location for development in the south of the plan area. It is also well served by public transport, and additional growth here would align to climate change policy. Further allocations should therefore be made.</p> <p>Wymondham Wymondham is sustainable settlement located on the A11 corridor. The town is the second largest population centre in the plan area and has a wide range of services and facilities, rail links and a high-quality bus route into Norwich City Centre.</p>	
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		<p>The growth corridor forms the heart of the spatial strategy for the draft GNLP. Despite Wymondham’s strategic position in the corridor, minimal growth is planned in addition to committed development. The absence of allocations significantly reduces the effectiveness of the GNLP in delivering Tech Corridor ambitions and in making use of local development opportunities.</p> <p>Gladman acknowledge the potential for further growth in the town brought by the possible contingency, however consider that this contingency should be made an allocation to make the most of Strategy Growth Corridor opportunities and respond to overall concerns on the proposed housing requirement and amount of development planned.</p> <p>Poringland</p> <p>Poringland has good services and public transport and is arguably the most appropriate KSC for development.</p> <p>The draft Plan does not direct any growth to Poringland beyond committed development. This is not a sound strategy noting the above sustainability credentials. Opportunities for further allocations should be identified.</p>	
22364 Pegasus Group for Pigeon Investment Management	Comment	<p>Appendix 1 contains detailed comments.</p> <p>Note concerns over:</p> <ol style="list-style-type: none"> 1. The overall housing numbers being too low as they do not Implement the standard methodology correctly. They do not provide for the minimum required amount of housing correctly. They also do not provide for the additional growth required by the NPPF in Greater Norwich taking account of: <ul style="list-style-type: none"> • The City Deal • Previous assessments of need 	

		<ul style="list-style-type: none"> • The needs of specific groups (students and those in residential institutions) <p>The actual need is for at least 42,400 homes to accord with the City Deal, meet the minimum local housing need and to accommodate the growth plans of UEA as well as a need for an additional 1,800 bedspaces in communal establishments.</p> <p>The proposed contingency of 9% should be retained as a minimum but this should be significantly greater, which in addition to the minimum housing need for circa 42,400 homes produces a housing requirement for at least 46,216 homes.</p> <ol style="list-style-type: none"> 2. The amount of growth focussed on the urban area; 3. Deliverability of brownfield regeneration areas + urban extensions (soundness issue); 4. No trajectories produced yet; 5. More allocations required in main towns + KSCs, fewer in urban area + village clusters; 6. No certainty over the supply of land to deliver development in South Norfolk Village Clusters (soundness issue); 7. Diss could accommodate more housing growth to provide a better balance between employment and housing land availability. 	
22749 Rosconn Group	Comment	<p>Whilst RSL generally agree with the proposed settlement hierarchy, there appears to be no explanation within Policy 1 or elsewhere, as to what the purpose of the hierarchy is other than to confirm that this has been used to inform the distribution of growth. Whilst paragraph 166 confirms which settlements fall into which level of the hierarchy, there appears to be no explanation as to what the role and function of each tier in the hierarchy is. It is therefore difficult to comment on whether the proposed distribution</p>	<p>Assess how/whether the role and function for each tier in the hierarchy could be more clearly set out.</p>

	<p>of growth within the hierarchy is appropriate or not. It would therefore assist the reader if the role and function for each tier in the hierarchy could be clearly set out within the policy or otherwise within the explanatory text.</p> <p>Notwithstanding the above, further explanation is required as to the role and function of the Strategic Growth Area (SGA). Whilst Policy 1 and paragraph 166 state that it is the settlement hierarchy that has guided the distribution of growth, this appears to then be contradicted by the statement at paragraph 169 which suggests that the strategy is to direct 78% of the growth to the SGA. It is therefore unclear whether it is the settlement hierarchy or the SGA that have influenced the distribution of growth and this should be clarified.</p> <p>In terms of the distribution of growth, Policy 1 states that growth has been distributed in line with the settlement hierarchy to provide good access to services, employment and infrastructure. However, in reality, the majority of growth (83% of the minimum Local Housing Need) is already committed through historic allocations and existing permissions, 72% of which are within the Norwich Urban Area. Considering the overall geographical scale of the 3 authorities, this is a significant amount of development committed to a relatively small area. Whilst it is agreed that a large proportion of growth should be located in and around the principal settlement within the Plan area, directing further growth through new allocations to an area which is already well-catered for in terms of future growth is questionable, particularly from a deliverability perspective. Is it realistic to expect that the scale of growth already committed, alongside an additional 4,395 homes through new allocations is likely to be deliverable within the Plan period? The evidence referred to earlier has highlighted the real challenge to achieving the levels of growth identified for the NPA through the current JCS. Directing further growth to this area must therefore raise concerns about whether this is a justified and effective strategy. Furthermore, will this achieve the objectives set out at paragraph 164, particularly (4) focussing a reasonable level of growth in the main towns, key service centres and village clusters to support a vibrant rural</p>	<p>The role and function of the Strategic Growth Area could be more clearly set out.</p> <p>More growth should be focussed more on the main towns and KSCs – Aylsham and Long Stratton in particular.</p>
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		<p>economy, and (6) allocating a significant number of medium and smaller scale sites in towns and villages to provide a balanced range of site types to allow choice, assist delivery and allow smaller scale developers and builders into the market?</p> <p>In summary, RSL object on the basis that further consideration should be given to directing a greater proportion of the residual housing requirement through new allocations towards the Main Towns and Key Service Centres, particularly those that are located outside the SGA in order to enable the sustainability benefits of housing growth to be distributed more widely and fairly. Settlements such as Long Stratton and Aylsham for instance play a wider role in serving a principally rural hinterland and growth can assist in maintaining and enhancing services and facilities that these wider rural communities are reliant on. This approach would remain aligned with the preferred growth option of directing the majority of growth around the Norwich Urban Area and within the SGA, whilst allowing a greater level of dispersal to support thriving rural communities. Such an approach is also likely to be more deliverable than the current all the eggs in one basket approach where almost all of the growth is directed to the Norwich Urban Area / SGA with very little being directed to the rural communities elsewhere within the plan area. This is not considered to be consistent with the objectives of paragraph 78 of the NPPF.</p>	
22438 Bidwells	Comment	<p>Great Plumstead and Little Plumstead is identified as a Service Village in the JCs, recognising its suitability for small/medium scale residential development. It is designated as a Village Cluster in the draft GNL. Policy 1 states that 480 additional dwellings will be distributed amongst those Broadland Village Clusters with higher potential to accommodate growth.</p> <p>Appendix 5 of the GNL Draft Strategy Document lists Great and Little Plumstead among those Broadland Village Clusters with ~higher potential to accommodate growth of 50-60 dwellings in the Plan period. This reflects the range of services and amenities available within the Village Cluster which are all within walking distance of GNL0420R.</p>	Note view that GNL0420R is a site which is entirely deliverable and should be taken forward as a site allocation in Great and Little Plumstead which have a good range of services.

		<p>Despite this, no sites in Great and Little Plumstead have been identified for growth in the Plan period to 2038. Seemingly, the rationale for excluding new allocations from Great and Little Plumstead is due to the presence of significant existing commitments in the Village Cluster (129 dwellings). However, there does not appear to be any commentary as to whether these 129 consented dwellings are considered deliverable in terms of the NPPF definition, or if they are included in the 995 dwellings across Broadland’s Village Clusters which are considered deliverable in Policy 1.</p> <p>From further review of Appendix 5 of the GNLP Draft Strategy Document, the emerging draft allocations across Broadland’s Village Clusters have been identified to deliver a minimum of 358 dwellings, and a maximum of 517 dwellings. This offers no guarantee that the required 480 additional dwellings are deliverable.</p> <p>More sites across the Broadland Village Clusters should be allocated to give the GNLP greater resilience. GNLP0420R is ideally placed to provide this resilience, by providing small-scale residential development, in accordance with the parameters of the current call for additional sites across Broadland and South Norfolk’s Village Cluster.</p> <p>GNLP0420R is a site which is entirely deliverable and should be taken forward as a site allocation to secure sustainable growth in Great and Little Plumstead to 2038.</p>	
22449 Gladman	Comment	<p>Support identification of Poringland as a KSC in the settlement hierarchy. It forms a sustainable and logical location for new development. It is the fifth largest settlement outside the Norwich Urban Area and has a wide range of services and facilities and regular bus service into Norwich City Centre.</p> <p>Concern that currently no further growth (beyond existing commitment) is directed towards Poringland. The spatial strategy for housing growth needs to direct higher numbers to sustainable settlements within the KSC tier, such as Poringland. This would</p>	Note view that new allocations should be made in Poringland.

		help alleviate the pressure of delivery for larger strategic sites, with smaller allocations that could deliver during the early stages of the adoption of the plan.	
22454 Gladman	Comment	<p>Support identification of Diss as a Main Town within the settlement hierarchy.</p> <p>More growth than is currently proposed in Diss is suitable due to its strong retail offering and other services + good transport links.</p> <p>The consultation document suggests that growth at Diss has been limited due to highways constraints and congestion. This is based upon local evidence, the Diss Network Improvement Strategy (February 2020), which Gladman do not consider to be a robust document.</p> <p>We are willing to engage with the Council to see if development proposals being promoted by Gladman could provide assistance in addressing highways constraints.</p>	<p>Note:</p> <p>Support for Diss' identification as a main town;</p> <p>View that more growth could be accommodated as highways study is flawed;</p> <p>Offer to work with councils to overcome highways constraints through development proposals.</p>
22463 Gladman	Comment	<p>Support identification of Wymondham as a Main Town within the settlement hierarchy due to its strong retail offer and other services + good transport links.</p> <p>Option 3 (supporting the Cambridge to Norwich Tech Corridor) has been selected by the Councils as the basis for its spatial strategy. The concentration of housing in this corridor will help secure a sustainable distribution of development and support economic growth.</p> <p>Wymondham forms one of the most appropriate locations within the plan area to concentrate development (inclusive of the proposed contingency). The Plan's proposed approach in this regard is justified.</p>	<p>Note support for identification of Wymondham as a Main Town.</p>
22470 Breckland DC	Comment	<p>Breckland DC seeks confirmation that the proposed growth from GNLP will not be of detriment to the growth planned within Breckland. In particular the Council is</p>	<p>Note need to continue to engage with Breckland DC on infrastructure capacity</p>

		<p>concerned that the cumulative growth impacts on transport, power, water supply have been adequately addressed.</p> <p>BDC has concerns whether the proposed improvements on A11 and A47 will be sufficient to meet the needs of the cumulative growth from the two planned areas. Equally is there sufficient railway capacity to cope with increased growth?</p> <p>Under the Duty to Cooperate, Breckland District Council would welcome the opportunity to engage with GNLP to explore a joint approach to any constraints which may arise as a result of the cumulative growth in both planned areas.</p>	<p>issues through the county wide Strategic Planning Forum and the Norfolk Strategic Planning Framework (NSPF).</p>
22487 Highways England	Comment	<p>The consideration of main towns and service centres within the hierarchy is reasonable. Levels of growth at these locations and associated land use policy should be focused on developing these sites locations as self-sustaining communities and not dormitory estates acting as satellites to the main conurbations. Failure to achieve this will put unnecessary strain on the existing highway infrastructure</p> <p>Highways England supports the position that robust steps must be taken to prioritise healthy and sustainable travel</p> <p>It is noted that three new potential future settlement sites have been proposed at Honingham Thorpe, Hethel and Silfield. It should be made clear that the next review of this plan will not be necessarily limited to those sites and consideration will be focused on sustainability and good connectivity.</p>	<p>Note:</p> <p>HE support for hierarchy as means of reducing strain on the highway network and prioritising active + sustainable travel</p> <p>View that, in relation to new settlements, the review of the plan should not just focus on the current proposals.</p>
22515 Broadland Green Party	Comment	<p>We support the view of Professor John Wood, Head of Department of Veterinary Medicine, University of Cambridge that the Cambridge - Norwich high tech link is potentially very positive: we have very strong links and hope that a lot of biotech will continue. However, regarding housing needs now and in the future wealthy people will always source housing but there is insufficient housing for the people who most need it to support the biotech sector: the technicians, veterinary nurses and innumerable</p>	<p>Note:</p> <p>Support for growth potential of the tech corridor</p>

		support staff. Robust and well managed social housing schemes are the best way to provide this. We also caution against increasing our carbon footprint through the linkup. We really need a good cycle route for the electric bikes that should be ubiquitous in 10 years-time, not further road development.	Concern over affordable housing provision Support for an improved cycle network rather than road building
22695 Strutt and Partner LLP for Scott Properties Ltd	Comment	The preferred option is supported and provides a balance across a range of the objectives of the Local Plan. The settlement hierarchy's recognition of the contribution that the Main Towns like Harleston make to the delivery of housing is acknowledged and supported. While it is acknowledged that Norwich should be the principal focus growth, the market towns have an important role in creating a vibrant sub-region, and in the case of Harleston, serve wide hinterlands from which people are drawn to use the town's shops, services, and facilities, including both primary and secondary schooling.	Note support for the hierarchy and Harleston's role as a main town.
22725 Pegasus Group for Halsbury Homes	Comment	Our client broadly agrees with the proposed settlement hierarchy and the need to focus larger development in accessible locations with good access to jobs, services and existing and planned infrastructure. They also support the use of minimum housing commitments which provide the opportunity to boost housing supply in line with the Government's objective and in light of the districts consistent under delivery. Halsbury Homes Ltd does, however, question the reliance on allocations through the South Norfolk Village Clusters Housing Sites Allocation Plan and this mechanism's ability to deliver the required housing stock in the plan period. Land off Norton Road, Loddon falls outside of the current settlement boundary but adjoins it to the north west and within the proposed allocation of Policy GNLP0312 (Land to the east of Beccles Road). The site is easily accessible to Loddon's High Street which has an excellent range of shops, services, employment opportunities and a frequent bus line to Norwich city centre. Furthermore, there are employment opportunities available at Loddon	Note: Support for hierarchy + Loddon's role as a KSC; Questioning of the SN Village Clusters approach; Promotion of land off Norton Road Loddon for allocation.

		Industrial Estate. By affording sustainable levels of growth to areas such as this it will assist in safeguarding existing services, public transport links and infrastructure which local people currently rely upon and support vibrant rural communities.	
12424 Hingham Town Council	Object	The hierarchy is flawed. Several parishes have been designated as Key Service Centres, at no point in the document is there a definition for a “Key Service Centre”. The lack of concrete criteria for a “Key Service Centre” renders the designation of such an entity meaningless.	Consider whether text on Key Service Centres in para. 333 needs further detail to provide clearer criteria to define the how settlements are placed in the hierarchy.
21512 Hingham TC	Object	Hingham has an allocation of 120 new homes (including 16 existing commitment), however the consideration of Windfall sites as being “acceptable in principle“ of sites of up to 3 homes within each parish would mean the ACTUAL homes that will be delivered is potentially unquantifiable (Policy 7.5 is ambiguous in its meaning and needs clarification).	Windfalls in addition to allocations (120 in Hingham) mean that delivery will be potentially unquantifiable
19982 Hainford Parish Council	Object	The Parish Council does not support the Village cluster proposal. Whilst there may be some justification for clusters in remote rural areas, most villages are able to continue to access services as they currently do. Becoming part of a cluster will result in inevitable exposure to wider and unnecessary development and the ultimate loss of existing settlement boundaries and village identity.	Note opposition to village clusters and view that while they may be suitable in very rural areas, they will lead to more development and loss of settlement boundaries and village identity.
20027	Object	Prefer less housing in the main towns, until their infrastructure is substantially improved and a greater percentage in the villages to ensure they survive as living communities and not as towns for holiday lets and weekenders. This would mean a greater investment in public transport.	Note preference for less growth in towns and more in villages to support living communities.
20468	Object	Object to the proposed establishment of "village clusters". The idea of clustering adjoining villages appears to be a thinly veiled arrangement to merge communities and so provide wide swathes of land for future housing. The current target of AT LEAST 1200 new houses is almost as much as the existing commitment. Compare that to Norwich and the larger towns who are only expected to provide a further quarter of	Note opposition to village clusters and view that: the amount of additional growth in clusters is

		their current expansion. It is nonsensical to push development out into the remoter communities where by and large there is virtually no local employment. CLIMATE CHANGE WILL REQUIRE LOCAL JOBS.	disproportionate compared to larger settlements; climate change means that homes should be located where there is local employment.
20507	Object	If the objective is, as stated in para 125, to achieve a "radical shift away from...private car and encourage walking, cycling and use of clean public transport", then allocation of housing sites where infrastructure and services already exist is essential. On this basis a fundamental reappraisal, not only of the current proposals, but of many sites already in the system is required.	Note view that the plan objective to promote sustainable transport means that a fundamental reappraisal of the hierarchy and sites is required.
20423 Sworders	Object	Inclusion of contingency sites in Costessey and Wymondham should does not comply with the NPPF (paragraph 23) that strategic policies should provide a clear strategy for bringing sufficient land forward. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area. If there is concern that the Plan's focus on large sites could result in delays to delivery of housing, this should be addressed at the Plan making stage by the allocation of further, smaller sites in the villages; these smaller sites are likely to be more deliverable and such a strategy would provide a greater degree of certainty of delivery.	Consider whether: <ul style="list-style-type: none"> contingency sites are appropriate; plan should include more smaller sites in villages as these are more deliverable
20624	Object	No justification for changing the settlement hierarchy by merging the bottom three tiers into a single village clusters category. The purpose of the hierarchy is to direct development towards suitable areas with good access to public transport and services. In the current hierarchy, settlements in the bottom two tiers had very little in the way of services and were therefore deemed generally unsuitable for development. The proposed approach, by incorporating all settlements into "clusters", creates a situation where development can be allowed even in tiny villages with no services.	Note support for the lower tiers of the current (JCS) hierarchy and opposition to village clusters as this approach will allow development in tiny villages without services.
20638	Object	No summary provided	

Carter Jones LLP for Nobel Foods Ltd - Farms			
20745 CPRE	Object	<p>We support the continuation of the settlement hierarchy as defined in the JCS. We wonder why and where the concept of “village clusters” has been introduced into the planning process. For many reasons they appear to be a flawed unsustainable concept. A real strength of the JCS was its inclusion of a Norwich Policy Area and Rural Policy Areas, and therefore we are very disappointed that this distinction has been abolished. The Rural Policy Areas gave real protection to the countryside: this is threatened by the introduction of the village cluster approach. This is another example of how the Draft GNLP contradicts the existing agreed Local Plan.</p> <p>CPRE Norfolk has serious misgivings about the separation of the sites and allocations for new housing in the South Norfolk Village Clusters from the rest of the GNLP and its current consultation. In addition, we strongly object to the use of the open-ended statement that these South Norfolk “village clusters” will be allocated a ‘minimum’ of 1,200 houses, rather than giving a maximum number as is the case for the Broadland “village clusters”.</p> <p>There is very little economic evidence to suggest that cementing new housing estates onto the edges of villages will bring any boost to local services where they exist, but rather it is more likely to put a strain on these services, especially health and education provision. The existing Settlement Hierarchy has also played a major part in protecting rural areas from excessive development and should be retained in its present form.</p>	<p>Note:</p> <p>opposition to village clusters and support for retention on current JCS hierarchy;</p> <p>view that housing delivery should be phased with existing allocations first;</p> <p>opposition to separation of SN village sites from sites plan and use of a minimum figure rather than the maximum used for Broadland;</p> <p>view that too much growth in villages will place strain on health and education and not support other services.</p>
20968	Object	<p>In the first instance I do not consider that the level of "growth" proposed is sustainable for us or the future generations. Continuing to march on heads down with the same acceptance of "growth" as desirable above everything else is not sustainable. The</p>	<p>Note view that the level of growth and placing it in towns and villages is</p>

		location of development Policies 1 and 7 place suburbia 3 miles and more from the City Centre demanding transport journeys for work and leisure. Increasing the population of Towns and Villages places even more people on the move. Our private bus companies are inadequate now. Adding another 100,000 people will only further break the systems.	unsustainable, particularly in relation to buses
21093 Saving Swainsthorpe Campaign	Object	Within the draft plan the concept of 'village clusters' is not explained and the reader is left to assume that this concept has some planning precedent. The terms do not appear in the Joint Core Strategy (adopted in 2011) and, judging by the withdrawal of South Norfolk from the village clustering part of the plan, the concept arrived 'oven ready' at a very late stage in the GNLP process. Our view is that this approach has rendered the GNLP growth strategy seriously flawed.	Note view that village clusters approach is not explained which means the growth strategy is flawed. Consider whether the concept of village clusters and the role of the SN village clusters plan can be more clearly explained.
21272 Lanpro	Object	Lanpro do not support the proposed settlement hierarchy as currently proposed. Lanpro's conclusion is that the plan is saying the right things about future ambitions for Greater Norwich and the Tech corridor, but doing another, by virtue of directing too much growth to the rural areas outside of both the Tech corridor and the newly identified Strategic Growth Area.	Note view that, against the plan's ambitions, the hierarchy directs too much growth to village clusters outside the tech corridor and SGA
21389 Glavenhill	Object	Glavenhill Ltd do not support the proposed settlement hierarchy as currently proposed. Glavenhill Ltd's conclusion is that the plan is saying the right things about future ambitions for Greater Norwich and the Tech corridor, but doing another, by virtue of directing too much growth to the rural areas outside of both the Tech corridor and the newly identified Strategic Growth Area.	
21449 Hopkins Homes Ltd	Object	To be 'positively prepared' and 'effective' (NNPPF para 35) the Local Plan should provide a responsive and flexible supply of housing to maintain housing delivery achieved through allocating more sites and making it clear that sustainable development will be supported	Note view that growth should be allocated in Wroxham to meet development needs, including the needs of the

		<p>(NPPF, para 11). The NPPF makes it clear that the sustainable development merits of a plan should be assessed against the policies in the Framework taken as a whole. With the evidence being weighted on transport and landscape issues, there is not sufficient evidence to suggest that the exclusion of Wroxham provides a holistic approach to meet the tests of soundness set out in NPPF. We do not agree with the Council's assertion that development at Wroxham would result in substantial harm. We have demonstrated that any impacts that might result from the development can be mitigated (see also response to Question 44 below).</p> <p>Additional allocations, including Hopkins Homes' land at Wroxham can assist in planning positively to meet development needs, including the needs of the growing elderly population and affordable housing. We consider that there may be a number of benefits in identifying additional greenfield sites at Wroxham. These include:</p> <ul style="list-style-type: none"> • There are extensive areas of unconstrained land at south Wroxham that can deliver homes quickly to boost supply and assist in maintaining a positive five-year supply position. • This is an attractive area to the market and is likely to deliver the homes needed. • It is a highly sustainable location with good transport public links including high frequency bus services to Norwich. • The land at south Wroxham is deliverable and is in single ownership allowing comprehensive planning and delivery. 	growing elderly population and affordable housing
21427 Hempnall PC	Object	<p>We support the continuation of the JCS settlement hierarchy. We wonder why and where the concept of "village clusters" has been introduced into the planning process. For many reasons they appear to be a flawed unsustainable concept. A real strength of the JCS was its inclusion of a Norwich Policy Area and Rural Policy Areas, and therefore we are very disappointed that this distinction has been abolished. The Rural Policy Areas gave real protection to the countryside: this is threatened by the introduction of the village cluster approach. This is another example of how the Draft GNLP contradicts the existing agreed Local Plan.</p> <p>We have serious misgivings about the separation of the sites and allocations for new housing in the South Norfolk Village Clusters from the rest of the GNLP and its current consultation. In addition, we strongly object to the use of the open-ended statement</p>	<p>Note:</p> <p>opposition to village clusters and support for retention on current JCS hierarchy;</p> <p>opposition to separation of SN village sites from sites plan and use of a minimum figure rather than the</p>

	<p>that these South Norfolk “village clusters” will be allocated “minimum” of 1,200 houses, rather than giving a maximum number as is the case for the Broadland. If the reason for this separation is, as was given at the recent GNDP meeting of 6th January 2020, the lack of suitable sites coming forward in these South Norfolk “village clusters”, then this gives another good reason why the delivery of housing should be phased. Clearly the sites included in the JCS have undergone rigorous assessment and their inclusion in the Local Plan is an acknowledgement of their suitability for development. It makes absolute sense that these suitable sites should be developed first especially given the fact that any new sites coming forward are deemed to be unsuitable.</p> <p>Paragraph 163d states that the strategy for location of growth focuses reasonable levels of growth in the main towns, key service centres and village clusters to support a vibrant rural economy, before suggesting that the approach to village clusters is innovative. The claim that providing new housing in such locations will support services is largely illusory. Instead, additional new housing will lead to more car and delivery vehicle journeys, with residents travelling longer journeys to access the services they require such as health services and a supermarket. Given that the majority of any such new houses will be larger family homes, with children just or more likely to be of secondary or tertiary school or college age than of primary school age. This will have further negative impacts on carbon reduction due to the additional journeys needed to secondary schools or colleges.</p> <p>It is clearly demonstrated in the table on page 80 of the 23 June 2017 GNDP Board Papers that the most reasonable option for the distribution of housing in terms of the environment (e.g. minimising air, noise and light pollution; improving well-being; reducing CO2 emissions; mitigating the effects of climate change; protecting and enhancing biodiversity and green infrastructure; promoting the efficient use of land; respecting the variety of landscape types in the area; ensuring that everyone has good quality housing of the right size; maintaining and improving the quality of life; reducing deprivation; promoting access to health facilities and healthy lifestyles; reducing crime</p>	<p>maximum used for Broadland;</p> <p>view that growth in villages will support services is illusory – it will lead to more car journeys to access services with climate change impacts. Strongly urge removal of the additional new housing sites in the village clusters (including Hempnall)</p> <p>GNDP evidence shows Option 1: urban concentration close to Norwich is the best and the least desirable is Option 4: dispersal. Strongly support urban concentration because it is best for the environment, minimising climate change and the well-being of residents.</p>
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	<p>and the fear of crime; promoting access to education and skills; encouraging economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintaining and enhancing town centres; reducing the need to travel and promoting the use of sustainable transport modes; conserving and enhancing the historic environment and heritage assets; minimising waste generation; promoting recycling; minimising the use of the best agricultural land; maintaining and enhancing water quality and its efficient use) is Option 1: urban concentration close to Norwich. In terms of all these factors taken together the least desirable option as shown on this chart is Option 4: dispersal. We therefore strongly support urban concentration in and close to Norwich as the way forward, because it is best for the environment, minimising climate change and the well-being of residents.</p> <p>There is very little economic evidence to suggest that cementing new housing estates on the edges of villages will bring any boost to local services, but rather they will put a strain on these services (especially the provision of health care and education) , where they exist.</p> <p>We cannot understand why the table showing the same set of factors in the Interim Sustainability Appraisal for the GNLP on page 42 shows some different results from the table on page 80 of the 23 June 2017 GNLP Board Papers. While the most recent table confirms that overall urban concentration is a better option than dispersal, it is even clearer in the earlier version. The table on page 42 shows that urban concentration is better than dispersal in terms of: minimising air, noise and light pollution; improving well-being; reducing CO2 emissions; mitigating the effects of climate change; protecting and enhancing biodiversity and green infrastructure; encouraging economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintaining and enhancing town centres; reducing the need to travel and promoting the use of sustainable transport modes. However, in terms of some of the other factors it seems that changes have been made to the table so that several options appear to be equal in terms of impacts, instead of showing</p>	
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		<p>what the earlier table demonstrated, which is that concentration was the best option and dispersal the least reasonable option.</p> <p>Given the clear benefits and advantages from these documents for the environment, climate change and other areas, as well as other reservations around lack of sustainability and issues of delivery, we strongly urge the GNDP to remove the requirement for additional new sites for housing in the village clusters (including Hempnall) from the GNLDP.</p>	
21729 Brown and Co.	Object	<p>It is considered that a new settlement is a suitable option now. Traditional strategic development in Greater Norwich has placed pressure on existing infrastructure and communities, resulting in the need for significant investment in upgrades in order to provide power, waste water treatment and other social infrastructure. The programme of works required to facilitate a number of strategic and non-strategic proposed and existing allocations is significant, requires significant investment and will, and already has, detrimentally impacted upon the timely delivery of development.</p>	<p>Note view that a new settlement is required now as it will provide infrastructure and lead to timely delivery of development compared to proposed and existing strategic and non-strategic allocations.</p>
21821 Barford + Wrampingham PC	Object	<p>Do not agree with the proposed hierarchy and distribution of housing: the village cluster site allocations and development are inconsistent with the more centralised location of industrial development e.g. on the Norwich Research Park and in Norwich. Furthermore, continued expansion of villages and therefore the village cluster approach just puts more and more strain on the limited local amenities and services if and where they exist. The village cluster policy seems to be an environmentally deleterious, but local authority-backed policy to the benefit of landowners, developers and house builders.</p>	<p>Note opposition to village clusters and view that it will separate homes from jobs and put more and more strain on the limited local services.</p>
21894 Barton Willmore for KSC Developments	Object	<p>Village Clusters</p> <p>The grouping together of Service Villages, Other Villages and Smaller Rural Communities and the Countryside into a single lowest tier within a settlement hierarchy comprising just four rather than six tiers as is currently the case would</p>	<p>Note view that:</p> <p>The hierarchy should retain its current (JCS) 6 tiers.</p>

	<p>significantly undermine the function and role that Service Villages can play in accommodating future growth. The approach is flawed.</p> <p>Service Villages such as Spooner Row are much more sustainable settlements capable of accommodating much higher housing growth than Other Villages and Smaller Rural Communities and the Countryside.</p> <p>Spooner Row benefits from a range of local services. Development presents the opportunity to enhance these facilities and also provide a village shop. Spooner Row benefits from being well connected due to its situation along the A11 corridor and benefits from a railway station with services to Norwich and Cambridge which is key to its future growth.</p> <p>If the settlement hierarchy is to continue to be rationalised into four tiers, we would recommend that Service Centres and Service Villages should be combined into a single 3rd tier and Other Villages combined with Smaller Rural Communities and the Countryside to form a 4th tier.</p> <p>Proposed Distribution of Housing</p> <p>In terms of the proposed distribution of housing within the hierarchy, the preferred option selected by the Council combines concentrating most of the development in and around Norwich and on the Cambridge Norwich Tech Corridor, with an element of dispersal to villages to support thriving rural communities.</p> <p>Our client supports this approach in principle as it would focus for development along the A11 corridor, fulfilling the Spatial Objectives of supporting the Cambridge to Norwich Tech Corridor, plus locating growth near to jobs and infrastructure. The merging of a number of tiers within the Settlement Hierarchy however does not support this proposed distribution of growth, with Service Villages potentially missing</p>	<p>The distribution of growth should support more growth in service villages such as Spooner Row and limited growth in other villages and smaller rural communities to reflect their sustainability and potential for additional growth.</p>
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		<p>out on growth by being categorised within Village Clusters even if they are situated within the Tech Corridor.</p> <p>The GNLP proposes to allocate and permit housing growth of 4,024 homes within village clusters. The Core Strategy identifies 61 service villages and 39 other villages. The distribution would result in a very low level of growth within each (circa 42 within each over the Plan Period) which is not likely to support sustainability or viability.</p> <p>There are clear differences between settlements within the village clusters and if the proposed hierarchy is to be adopted there needs to be clear recognition that larger villages such as Spooner Row should accommodate more growth than smaller villages which were previously lower in the settlement hierarchy.</p> <p>Spooner Row is situated along the A11 corridor within the Cambridge to Norwich Tech Corridor. It also has a railway station which is key to the settlement's future growth. The proposed distribution of growth would result in this highly sustainable settlement which has the capacity to accommodate generous amount of growth missing out on growth and the potential to improve its local services.</p> <p>The distribution of growth should explicitly support more growth in certain service villages such as Spooner Row and more limited growth in other villages and smaller rural communities to reflect their sustainability and potential for additional growth.</p>	
<p>22019 Mulbarton PC</p>	<p>Object</p>	<p>A real strength in the JCS was its inclusion of a Norwich Policy Area and Rural Policy Areas, and therefore MPC are very disappointed that this distinction has been abolished and the impact this would have on the village.</p> <p>MPC has serious misgivings about the separation of sites and allocations for new housing in the village clusters that will be allocated a "minimum" of 1,200 houses, rather than giving a maximum number which concerns the residents of Mulbarton who have already seen wholesale development of their village in the last decade.</p>	<p>Note:</p> <p>opposition to village clusters and support for retention on current JCS hierarchy;</p>

		<p>The claim that providing new housing in such locations will support services have proved in Mulbarton to be untrue with little increase in services and has led to increased transport with the knock-on effect for climate change.</p>	<p>opposition to separation of SN village sites from sites plan and use of a minimum figure;</p> <p>view that growth in villages will not support services (as proved in Mulbarton) and will increase transport and effect climate change.</p>
<p>22096 Barton Willmore for Quantam Land</p>	<p>Object</p>	<p>We object to the spatial strategy for housing Our main objections are:</p> <ol style="list-style-type: none"> 1.The lack of focus and housing allocations proposed for the Key Service Centres in comparison to lower settlement hierarchy tiers; and 2.The allocation of no housing growth to Brundall; <p>Whilst the focus on the urban area of Norwich Urban Area is appropriate, we consider that the balance across the settlement hierarchy is not optimal or justified. The Main Towns and Key Service Centres have individually less housing directed to them than the bottom of the settlement hierarchy, the village clusters, which has more dwellings. In fact, the second and third tiers of the settlement hierarchy have almost the same number in totality as the bottom tier. This seems unjustified given that they are the least sustainable locations for growth.</p> <p>This is illustrated in that of the 9 key Service Centres only 4 have any new dwellings proposed and 1 of those 3 have only 15 units. Brundall has no housing allocated to it all despite being one of the closest and well-connected settlements to Norwich.</p> <p>It is acknowledged that in both the Main Towns and Key Service Centres there are many reasonable alternatives that exist and so under alternative spatial approaches, a different spatial pattern could be achieved more sustainably. We consider the spatial distribution should be Considered.</p>	<p>Note view that</p> <p>More allocations required in main towns + KSCs, fewer in village clusters;</p> <p>New housing growth should be allocated in Brundall which is close and well-connected to Norwich.</p>

<p>22282 Savills for Hugh Crane Ltd</p>	<p>Object</p>	<p>Support is given to the approach to focus development on the area around Norwich but additional consideration should be given to the inclusion of Blofield and Blofield Heath within the Strategic Growth Area to support growth aspirations for Greater Norwich.</p> <p>Furthermore additional consideration should be given to the grouping of access to facilities at Blofield and Blofield Heath given the approach taken within the Neighbourhood Plan.</p> <p>Consequentially it is considered appropriate to allocate additional growth to Blofield Heath.</p>	<p>Note view that:</p> <p>Blofield and Blofield Heath should be included in the SGA</p> <p>They should be considered together (as a KSC) through the plan given the Neighbourhood Plan approach</p> <p>More growth should be allocated in Blofield Heath</p>
<p>22398 Norwich Green Party</p>		<p>Concerns:</p> <p>Norwich urban area: although we wish to see growth concentrated in and around Norwich, we do not wish to see growth allocated to areas which are not well served by public transport. EG we do not support strategic allocation at Taverham off Fir Covert Road because there are no plans or funding for upgrading public transport infrastructure along Fakenham Road. The failure to secure adequate Transforming Cities funds will prevent upgrading to public transport system for serving growth communities unless new sources can be obtained.</p> <p>Main towns: growth should be limited to nodes on rail network.</p> <p>Key service centres: growth should be limited to nodes on rail network.</p>	<p>Note view that:</p> <p>Only allocate sites in the urban area with good public transport</p> <p>Only grow main towns + KSCs with rail links</p> <p>Village clusters opposed on sustainability grounds – social housing only</p>

		<p>Village clusters: oppose on climate change grounds, apart from identification of sites for local social housing.</p> <p>'Delivery' skews distribution of housing allocations in favour of dispersal options. Delivery has nothing to do with sustainability; it is not an objective in the SA and should be disregarded for purpose of weighing up policies on sustainability grounds.</p>	<p>Delivery is not a SA objective and should be disregarded for weighing up policies on sustainability grounds</p>
22643 Cllr Julie Neesam	Object	<p>NO - Becoming part of a cluster will result in inevitable exposure to wider and unnecessary development and the ultimate loss of existing settlement boundaries and village identity.</p>	<p>Note view that clusters will lead to more and unnecessary development, loss of settlement boundaries and village identity.</p>
22849 Crown Point Estate	Object	<p>Our concern relates to opportunities for windfall developments outside village boundaries. Windfalls are considered by the GNLP to relate to small sites within built-up parts of villages, leaving no positive planning policy support or control over village edge sites. It is important that windfall sites are defined in a way that includes edge of settlement sites, controlled by policies regarding sustainability, accessibility, character and appearance, rather than arbitrary figures. We expand on this under the windfall policy 7.5 below.</p>	<p>Note view that GNLP policies should allow for controlled windfall development on the edge of villages</p>
22921 Savills for Barratt David Wilson Homes	Object	<p>The limited amount of growth assigned to Horsford which despite being a village cluster, is the ninth most populous settlement across all three districts, and recognised as being a sustainable location for additional residential development, is not supported.</p> <p>It would be far more representative of positive planning, and a far more justified and effective strategy, to recognise and reflect the recent growth of Horsford and to provide for further growth to yet further improve the sustainability of the village.</p>	<p>Note view that more growth should be focussed in Horsford as it is a sustainable location.</p>
David Lock Associates for Orbit Homes		<p>There is a significant lack of clarity regarding the approach to</p>	<p>Note view that</p>

		<p>distributing growth as there are multiple different locational criteria (para. 164) taken into account in addition to the settlement hierarchy. This causes confusion and means that it is difficult to determine whether the approach to distributing growth is robust.</p> <p>It is not clear which of these take precedence and how they are intended to interrelate. As such, it is not appropriate to simply ask whether there is agreement with the distribution of housing within the hierarchy as this is not the only factor affecting the location of growth. This approach should be clarified.</p> <p>It is also not clear, apart from the allocations in the Norwich Urban Area, how the growth and distribution strategy is reflective of any of the other reasonable alternatives considered in the 2018 Growth Options consultation. Worryingly, apart from providing a brief rationale as to why alternative approaches have not been pursued in respect of Policy 1, there is no formal SA of alternative approaches to the distribution of homes and the level of housing growth. Despite reference to options being considered at previous Regulation 18 stages, this is not a robust approach and could put at risk the draft plan in respect of its locational strategy as it has not been subject to testing against alternatives. Flaws of the Sustainability Appraisal (SA) are covered in the separate SA representation.</p> <p>Furthermore, the simplistic approach of relating growth distribution to the settlement hierarchy fails to have regard for alignment with other strategies, initiatives and investment in the area.</p> <p>The Plan makes these other important considerations very clear in its introductory chapters with particular reference to the transport network, recent and planned improvements, Transport for</p>	<p>Clarity is needed on the strategy for the locations for growth and the settlement hierarchy</p> <p>Reasonable alternatives have not been considered – soundness risk re SA</p> <p>There should be more growth in Wymondham to reflect transport and wider strategic priorities e.g. Tech Corridor</p>
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		<p>Norwich, the Norfolk County Council Rail Prospectus, East West Rail and the Transforming Cities Programme. In this context, the A11 corridor is clearly well placed to accommodate growth in light of recent improvements and its role as the spine of the Cambridge Norwich Tech Corridor. Wymondham itself is a focus for investment under the Transforming Cities Programme; its railway station is positioned on the potential extension of East West Rail and it is a growing hub for public transport accessibility. This is not however, then reflected in the distribution of growth.</p>	
23105 Salhouse PC	Object	<p>We supported the continuation of the settlement hierarchy as defined in the JCS. We wonder why and where the concept of village clusters has been introduced into the planning process.</p> <p>For many reasons they appear to be a flawed unsustainable concept. A real strength of the JCS was its inclusion of a Norwich Policy Area and Rural Policy Areas, and therefore we are very disappointed that this distinction has been abolished. The Rural Policy Areas gave real protection to the countryside: this is threatened by the introduction of the village cluster approach. This is another example of how the Draft GNLP contradicts the existing agreed Local Plan.</p> <p>As noted above in our response to Q1 CPRE Norfolk has serious misgivings about the separation of the sites and allocations for new housing in the South Norfolk Village Clusters from the rest of the GNLP and its current consultation. In addition, we strongly object to the use of the open-ended statement that these South Norfolk village clusters will be allocated a minimum of 1,200 houses, rather than giving a maximum number as is the case for the Broadland village clusters. If the reason for this separation is, as was given at the recent GNLP meeting of 6th January 2020, the lack of suitable sites coming forward in these South Norfolk village clusters, then this gives another good reason why the delivery of housing should be phased. Clearly the sites included in the JCS have undergone rigorous assessment and their inclusion in the Local Plan is an acknowledgement of their suitability for development. It makes absolute sense that</p>	<p>Note:</p> <p>opposition to village clusters and support for retention on current JCS hierarchy;</p> <p>need for phasing of housing delivery;</p> <p>opposition to separation of SN village sites from sites plan and use of a minimum figure rather than the maximum used for Broadland;</p> <p>view that too much growth in villages will place strain on health and education</p>

	<p>these suitable sites should be developed first especially given the fact that any new sites coming forward are deemed to be unsuitable.</p> <p>Paragraph 163d states that the strategy for location of growth “focusses reasonable levels of growth in the main towns, key service centres and village clusters to support a vibrant rural economy, before suggesting that the approach to village clusters is innovative. The claim that providing new housing in such locations will support services is, we contend, largely illusory. Instead, additional new housing will lead to more car and delivery vehicle journeys, with residents travelling longer journeys to access the services they require such as health services and a supermarket. Given that the majority of any such new houses will be larger family homes, with children just or more likely to be of secondary or tertiary school or college age than of primary school age. This will have further impacts on carbon reduction due to the additional journeys needed to secondary schools or colleges.</p> <p>It is clearly demonstrated in the table on page 80 of the 23 June 2017 GNDP Board Papers that the most reasonable option for the distribution of housing in terms of the environment (e.g. minimising air, noise and light pollution; improving well-being; reducing CO2 emissions; mitigating the effects of climate change; protecting and enhancing biodiversity and green infrastructure; promoting the efficient use of land; respecting the variety of landscape types in the area; ensuring that everyone has good quality housing of the right size; maintaining and improving the quality of life; reducing deprivation; promoting access to health facilities and healthy lifestyles; reducing crime and the fear of crime; promoting access to education and skills; encouraging economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintaining and enhancing town centres; reducing the need to travel and promoting the use of sustainable transport modes; conserving and enhancing the historic environment and heritage assets; minimising waste generation; promoting recycling; minimising the use of the best agricultural land; maintaining and enhancing water quality and its efficient use) is Option 1: urban concentration close to Norwich. In terms of all these factors taken together the least desirable option as shown on this chart is Option 4: dispersal. We</p>	<p>and not support other services.</p> <p>Question why most housing growth is focussed in NE when most strategic employment is in the SW</p>
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	<p>therefore strongly support urban concentration in and close to Norwich as the way forward, because it is best for the environment, minimising climate change and the well-being of residents.</p> <p>There is very little economic evidence to suggest that cementing new housing estates on the edges of villages will bring any boost to local services, but rather they will put a strain on these services, where they exist.</p> <p>We cannot understand why the table showing the same set of factors in the Interim Sustainability Appraisal for the GNLP on page 42 shows some different results from the table on page 80 of the 23 June 2017 GNDP Board Papers. While the most recent table confirms that overall urban concentration is a better option than dispersal, it is even clearer in the earlier version. The table on page 42 shows that urban concentration is better than dispersal in terms of: minimising air, noise and light pollution; improving well-being; reducing CO2 emissions; mitigating the effects of climate change; protecting and enhancing biodiversity and green infrastructure; encouraging economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintaining and enhancing town centres; reducing the need to travel and promoting the use of sustainable transport modes. However, in terms of some of the other factors it seems that changes have been made to the table so that several options appear to be equal in terms of impacts, instead of showing what the earlier table demonstrated, which is that concentration was the best option and dispersal the least reasonable option.</p> <p>Given the clear benefits and advantages from these documents for the environment, climate change and other areas, as well as other reservations around lack of sustainability and issues of delivery, we strongly urge the GNDP to remove the requirement for additional new sites for housing in the village clusters from the GNLP. The strategic economic growth is concentrated to the SW of Norwich, while the biggest housing growth is to the NE?</p>	
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Appendix 1 22364 Pegasus Group for Pigeon Investment Management view on the application of the standard methodology

Meeting the minimum housing need

The standard method provides the minimum local housing need according to the PPG (2a-004) and is calculated using the average household growth for 10 consecutive years, with an affordability uplift based on the median workplace based house price to earnings ratio of the preceding year.

The Draft Local Plan covers the period from 1st April 2018. In order to establish the minimum local housing need for the plan period it is therefore necessary to calculate either the standard method at 2018; or to calculate the current standard method and apply this to the remainder of the plan period in addition to the number of completions which have already occurred.

In the case of the Greater Norwich Plan Area, the average household growth over the 10 consecutive years from 2018, namely 2018-28, was 400 in Broadland, 510 in Norwich and 704 in South Norfolk. The median workplace based house price to earnings ratios in 2017 were 9.82, 6.93 and 8.91 respectively. Using these figures, the minimum local housing need over the plan period equates to 41,379 homes.

Alternatively, the minimum local housing need from 2019 onwards can be calculated using the average household growth over the 10 consecutive years from 2019, namely 2019-29, with the affordability ratios of 2018 applied. The average household growth was 397, 505 and 691 respectively and the median workplace-based house price to earnings ratios were 9.23, 7.03 and 8.78 respectively. These figures produce a minimum local housing need of 2,024 homes per annum which equates to 38,460 homes over the period 2019-38. The number of housing completions in 2018/19 need to be added to this figure to provide the minimum local housing need over the plan period. MHCLG Live Tables identify that there were 2,757 housing completions, as well as 260 student bedspaces and 91 other bedspaces completed in this year. Once the appropriate conversion factors as identified in the PPG (68-034) and the PPG (63-016a) are applied this would equate to 2,901 houses completed in 2018/19. In addition to the minimum local housing need of 38,460 over the period 2019-38 this would produce a minimum local housing need for 41,361 homes over the plan period.

Once the median house price to earnings ratio for 2019 and the number of housing and bed space completions in 2019/20 are available, it will be possible to provide yet another calculation of the minimum local housing need based on the completions in the period 2018-20 and the minimum local housing need over the period 2020-38. However, given the consistency of the preceding figures it would be expected that this would again be broadly consistent.

Exceeding the minimum housing need

The standard method also only provides the minimum local housing need, and the PPG (2a-010) identifies that this should be exceeded including in situations where there is a growth strategy or where strategic infrastructure improvements may drive an increase in housing need or where previous assessments of need are significantly greater than the standard method. All three of these situations arise in Greater Norwich.

The City Deal

Paragraph 13 of the Draft Local Plan identifies that the Greater Norwich City Deal requirements will be met through the Draft Local Plan. As the Greater Norwich City Deal forms a growth strategy which has been agreed with Government, the Local Plan is required to meet the requirements of the City Deal as this forms part of national policy as set out in paragraph 6 of the NPPF.

The City Deal identifies that strategic infrastructure is needed including to deliver a step change in housing delivery. It sets a target for an average of 3,000 homes per annum in the period 2014-19 and for 37,000 homes to be delivered in the period 2008-26.

MHCLG Live Tables identify that only 10,715 houses were built in the period 2014-19 in addition to the equivalent of 581 homes provided as student and older persons bedspaces. This provides a total of 11,296 or an average of only 2,259 homes per annum. It is therefore apparent that the short-term target of the City Deal has not been met and that accordingly this shortfall of 3,704 homes should be addressed as soon as possible to achieve the objectives of the City Deal. No such short-term uplift to remedy this shortfall is made within the Draft Local Plan contrary to the requirements of national policy in the form of the City Deal.

In the period 2008-19, the MHCLG Live Tables identify an equivalent of 19,416 housing completions, which means that in order to provide 37,000 homes in the period 2008-26 it will be necessary to deliver the remaining 17,584 in the period 2019-26 or an average of 2,512 per annum. However, the housing need identified in emerging Policy 1 of 40,550 homes 1 only provides for an average need of 2,028 homes per annum.

It is therefore evident that the Draft Local Plan does not meet any of the targets of the City Deal and that it is accordingly not effective, not justified, not positively prepared and inconsistent with national policy.

Previous assessments of need

The SHMA for Central Norfolk identifies that there was a need to deliver 44,714 homes from 2015-36 to accord with the City Deal. In the period 2015-18, the equivalent of 6,680 homes were delivered and so there is a residual need for 38,034 homes from 2018-36, or 2,113 per annum.

Assuming that this need remained constant across the period 2036-38, there would be a need for 42,260 homes to accord with the City Deal based on the latest assessment of housing need. The Local Plan does not therefore provide a sufficient number of homes to meet the latest assessment of need or to accord with the City Deal.

The housing need of students

The standard method is informed by the 2014-based household projections which assume that the five-year migration trends which were experienced in the period 2009-14 will be maintained. The Higher Education Statistics Authority (HESA) identified that University of East Anglia (UEA) had 16,640 students and the Norwich University of the Arts had 1,485 students in 2009 providing a total of 18,125, but that this had increased to 18,140 by 2014 with 16,265 at UEA and 1,875 at the University of Arts. The 2014-based projections which inform the standard method therefore assumes that the student population will increase by 15 people over five years or 3 per annum.

Paragraph 45 of the Draft Local Plan however indicates that the Universities in Norwich are expected to expand. In particular, the University of East Anglia (UEA) has announced plans to increase its students from 15,000 to 18,000 in the next decade, an increase of 300 students per annum. The increased migration of 297 students per annum, even assuming that the student population of the University of the Arts remains constant, are not taken into account in the projections.

These additional students at UEA will clearly have an impact on the housing need in Greater Norwich which is not taken into account within the standard method. Either these will generate a need for an additional 2,970 bedspaces which is equivalent to 1,042 houses or if these students are accommodated in the housing stock it will be necessary to deliver an additional 1,042 homes to accommodate them. It will be necessary to deliver such accommodation to meet the objectively assessed needs and to accord with the Vision of the GNLP.

Once the needs of these additional students are taken into account this would increase the minimum local housing need from either 41,379 or 41,361 to either 42,421 or 42,403 homes over the plan period. This broadly accords with the 42,260 homes necessary to accord with the City Deal.

The needs of those in institutional accommodation

The SHMA for Central Norfolk identifies a need for 3,909 people aged 75 or over to be accommodated in residential institutions over the period 2015-36. The 2014 based institutional population projections identify an increase of 2,060 such people within the GNLP area over the period 2015-38 comprising 1,088 in Broadland, 291 in Norwich and 681 in South Norfolk.

In the period 2015-18, a total of 234 bedspaces in older persons communal establishments were built, including 7 in Broadland, 225 in Norwich and 2 in South Norfolk. This leaves a residual need for 1,826 bedspaces in the period 2018-36, comprising 1,081 in Broadland, 57 in Norwich and 679 in South Norfolk.

The household projections which inform both the SHMA and the standard method do not include this population and the SHMA correctly recognises that in the absence of 1,826 bedspaces in communal establishments the population who would have occupied these will remain in the dwelling stock rather than releasing them as assumed in the projections.

It is therefore apparent that there is a need for 1,826 bedspaces in communal establishments in addition to the standard method and that in the absence of such provision the housing requirement will need to increase as fewer dwellings will be released to the market. The number of dwellings that would not be released in the absence of such residential institutions is 987 using the calculation identified in the PPG (63-016a) comprising 584 in Broadland, 33 in Norwich and 369 in South Norfolk.

It will therefore either be necessary to make provision for the 1,826 bedspaces or increase the housing requirement by 987 homes to meet the objectively assessed needs within the GNLP and to accord with the Vision of the GNLP. This would result in a need for either 43,408 or 43,390 homes or to 42,421 or 42,403 homes and 1,826 bedspaces.

The housing requirement

The Delivery Statement on page 37 indicates that the Draft Local Plan provides a sufficient supply of housing sites to exceed the identified housing need of 40,550 homes by 9%. However, as identified above, there is actually a need for at least 42,400 homes to accord with the City

Deal, meet the minimum local housing need and to accommodate the growth plans of UEA as well as a need for an additional 1,800 bedspaces in communal establishments.

In order to provide sufficient flexibility to ensure that these minimum needs will be delivered, taking account of the non-delivery of sites, it has been found by numerous Inspectors that it is appropriate to set the housing requirement above the minimum housing need as the Draft Local Plan seeks to do.

In Greater Norwich, the housing trajectory of the Joint Core Strategy identified that there would be 23,637 housing completions in the period 2008-19. However, only 18,835 homes have been delivered which demonstrates that at least historically, the trajectory of Greater Norwich overestimates the developable supply by circa 25%. Assuming that the current trajectory is equally as accurate, it would be appropriate to set a housing requirement 25% in excess of the minimum need for circa 42,400 homes. This would produce a housing requirement for circa 53,000 homes. This is illustrative that there is a need for a significant contingency allowance in Greater Norwich to ensure that needs are actually met. **It is therefore recommended that the proposed contingency of 9% is retained as a minimum but this should be significantly greater, which in addition to the minimum housing need for circa 42,400 homes produce a housing requirement for at least 46,216 homes.**

Contingency to respond to changes

The Government has identified an intention to review the standard method in September 2020 and this will be required to be responded to in the Greater Norwich Local Plan to meet the minimum local housing needs at the point of submission as required by the PPG (2a-008). This proposed review of the standard method means that the minimum housing needs may change from the 42,400 identified above. It may be that the minimum housing needs increase significantly and accordingly a sufficient developable supply (including the required contingency set out above) should be planned for to ensure that the emerging GNLP will be able to respond to the identified minimum needs at the point of submission as required by the PPG (2a-008).

Whilst it is not possible to identify the need which will arise from this review at present, it is considered that a sufficient developable supply (including the required contingency set out above) should be planned for to significantly exceed the identified need for at least 42,400 homes and provide confidence that the minimum needs arising from the review will be able to be accommodated.

Employment Land Requirement

As set out in the GNLP, there is no quantitative need for additional employment sites. Nevertheless, the GNLP allocates an additional 40ha providing a total of 360ha of employment land allocations to meet the underlying demand and provide choice to the market.

Whilst these allocations will assist the economic growth of the area and represent positive planning, if a significant proportion of these are actually developed and occupied, they will be dependent upon greater numbers of incommuters from outside of the plan area. Accordingly, an appropriate monitoring framework should be put in place to ensure that a sufficient number of homes are provided to address environmental harms of a greater dependency on long-distance commuting flows.

If the monitoring framework indicates that a greater number of jobs have been accommodated than the growth in the resident workforce such that the economy of the area becomes more dependent upon unsustainable long-distance incommuting flows, this should trigger an immediate review of the GNLP alongside a policy response with residential planning applications being considered more favourably until such time as the GNLP review is adopted to address the imbalance.

The approach to five-year land supply

Policy 1 proposes that the five-year land supply will be assessed across the plan area and that enough allocations are provided to demonstrate a five-year land supply at adoption. However, there is no evidence that this is the case as the GNLP is not supported by a housing trajectory contrary to paragraph 73 of the NPPF. Pegasus Group reserve the right to respond on this matter when the necessary evidence is made available.

Spatial Strategy

The Table at Policy 1 details the distribution of housing supply across the settlement hierarchy, including proposed new allocations as follows;

- Norwich urban area - 30,560 dwellings approximately 70% of supply
- Main towns 6,342 dwellings approximately 14% of supply
- Key Service Centres 3,417 dwellings approximately 8% of supply
- Village clusters 4,024 dwellings approximately 9% of supply

Policies 7.1 to 7.5 provide further detail on the distribution of sites and the composition of existing and proposed allocations with regard to their size and brown or green field status.

Our clients raise concern over the proposed spatial strategy of the emerging GNLP owing to its over reliance on housing delivery in the Norwich urban area and the proposed discrepancy in terms of settlement hierarchy between the need to accommodate the workforce to avoid the resultant quantum of housing allocated to Main Towns, Key Service Centres and Village Clusters.

While the Norwich urban area is a sustainable location for growth, reliance on this area for the delivery of approximately 70% of the housing growth of the GNLP up to 2038 places a requirement on existing infrastructure to accommodate an additional 30,560 dwellings in the plan period, it also requires an annual delivery rate within the area of 1,698 dwellings per annum over each of the next 18 years. This requires that the level of development in Norwich urban area alone is broadly consistent with that which has been achieved across the entire GNLP plan area since 2008. This does not appear to be realistic. If the necessary boost to housing supply is to be achieved this will require a greater range and choice of sites across all of the sustainable settlements within the plan area.

Moreover, reference to Policy 7.1 demonstrates that delivery within the Norwich Urban Area is predicated on two substantial brownfield regeneration areas, the Northern City Regeneration Area and the East Norwich Strategic Regeneration Area and several urban extensions of over 1,000 dwellings each.

Brownfield regeneration is costly and time consuming and often involves the bringing together of multiple delivery partners to achieve. The likelihood of the totality of development proposed through regeneration delivering in the plan period is therefore slim.

New strategic urban extensions can also be timely to deliver with the need for new strategic infrastructure in terms of highways and drainage to be delivered in advance of new homes.

The Councils have not produced evidence to substantiate the delivery trajectory of the brownfield regeneration sites or the urban extensions in the Norwich Urban Area. We reserve the right to comment further on this matter at the Regulation 19 consultation stage. Delay in delivery at either source of supply could prejudice the delivery of the housing requirement of the GNLP and therefore go to the soundness of the plan.

Additional certainty over the delivery of the housing requirement could be achieved by changing the emphasis of the spatial strategy by allocating more housing to the Main Towns, including Diss, and the Key Service Centres with an associated reduction in the percentage to be delivered in Norwich urban area and the Village Clusters.

Diss in particular is identified in the Reg 18 GNLP as having capacity for additional employment development. Diss is a net importer of workers with 2011 Census data showing only 4,939 economically active people living in the town compared to the 5,623 people working there. In order

to balance homes and jobs and provide for sustainable development it is necessary for more houses to come forward at Diss, especially given the re-allocation of 10.8ha of employment land at the Town in the Reg 18 GNLP.

Additionally, we have concerns over the fact that more dwellings are proposed in the spatial strategy across Village Clusters than are allocated at Key Service Centres, including a minimum of 1,200 dwellings through a South Norfolk Village Clusters Housing Site Allocations Development Plan Document.

Without certainty over the supply of land to deliver such a quantum of development in South Norfolk Village Clusters the soundness of the spatial strategy is questionable. As a percentage of the overall new housing allocations in the Reg 18 GNLP the current spatial strategy delegates approximately 15% to a document outside of its control (1200/7,840). This is not considered to be a reasonable approach and prejudices the delivery of the emerging GNLP by 2038.

A Settlement Hierarchy approach to the distribution of development would look to allocate a higher percentage of housing to more sustainable locations with smaller amounts being allocated to lower order settlements in recognition that small developments at villages can help maintain service provision, provide vitality and help address local market and affordable housing needs.

In failing to provide an increased number of dwellings at Main Towns and Key Service Centres the Councils are also missing the opportunities presented by Pigeon to provide new community facilities that can support existing and proposed new development in sustainable locations for the plan period and beyond.

The preceding representations on the Spatial Strategy are all set in the context that the identified housing need does not even accord with the minimum set by national policy and does not take account of the needs of specific groups. It is therefore evident that the quantitative elements of the Spatial Strategy will need to be revised to ensure that housing needs can be met across the GNLP area. This should be achieved through directing more growth to the Main Towns and Key Service Centres to counterbalance the disproportionate levels of growth proposed within the Norwich urban area and Village Clusters.

QUESTION 14

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 14 - Do you support, object or wish to comment on the approach for housing numbers and delivery?
TOTAL NUMBER OF REPRESENTATIONS:	79
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	16 Support, 38 Object, 25 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Robert Gower	Support	Policy 1 approach to windfall housing is supported (important contribution from small sites). Suggests 3 amendments: 1: within & <i>adjacent</i> to settlement boundaries. 2: Elsewhere in village clusters, subject to the requirements of Policy 7.4. 3: Clarify that maximum of 3 dwellings is per site, not per parish.	Suggested amendments & greater clarity required for approach to windfall housing.
Bidwells for Hopkins Homes, Persimmon Homes and Taylor Wimpey	Support	The proposed Settlement Hierarchy is supported; the Norwich Urban Area, including the fringe parishes such as Sprowston, is clearly the most sustainable location for growth, given the range of services available, and it is therefore appropriate to focus the majority of growth, including new allocations, here.	No issues requiring investigation
Mr Eric Hall (on behalf of Marstons Estates Ltd)	Support	Support overall growth strategy & consider Diss is appropriately identified as a main town to which significant additional development can be directed. Consider DIS 6 to be achievable as windfall in settlement boundary.	No issues requiring investigation
Bidwells (for UEA Estates) (x4)	Support	UEA fully support the identification of the Norwich Urban Area as a location to accommodate additional growth.	No issues requiring investigation

Redenhall with Harleston Town Council	Support	Support the preferred option in Policy 1 (Sustainable growth Strategy). Imperative the policy commits to review of the plan 5yrs after adoption	Imperative that policy commits to 5 year review of plan.
East Suffolk Council	Support	Support preferred option for growth including use of gov. standard methodology for assessing housing No.s & delivery, use of settlement hierarchy & approach to economy. Pleased that growth with buffer & employment can be accommodated in area.	No issues requiring investigation
Watkin Jones Group	Support	WJG supports the objectives for creating a vibrant and inclusive area that is enhanced by new homes, infrastructure and environment.	No issues requiring investigation
Bidwells for M Scott Properties Ltd	Support	<p>The requirement that sites should only be allocated for housing where, having regard to policy requirements, there is a reasonable prospect that housing can be delivered fully accords with para 67 of the NPPF and is supported</p> <p>The Council's approach to providing choice and flexibility in terms of housing growth by accommodating 9% more homes than are needed (increasing to 10% at the Regulation 19 stage), is supported. This buffer will help maintain the supply and delivery of housing in accordance with the NPPF and specifically the Government's objective of encouraging authorities to consider more growth than required to meet local housing need, particularly where there is potential for significant economic growth. This is particularly relevant given the under delivery of housing in the Greater Norwich Area between 2011 and 2019.</p>	No issues requiring investigation
CODE Development Planner Ltd.	Support	Support general strategy & housing growth in line with a settlement hierarchy; this will maximise use of brownfield land & provide urban extensions close to existing jobs services and infrastructure – most likely to achieve sustainable development.	No issues requiring investigation
Strutt & Parker LLP	Support	<p>9% buffer is supported (a higher buffer of 20% would normally be advisable to offset slow delivery).</p> <p>No allowance for windfall within figures provides flexibility.</p>	Suggest a higher buffer should be considered

		Due to uncertainty of some sites, it would be advisable to allocate smaller sites up to c.25 units across the plan area (NPPF 10% small sites requirement). Support the approach to village 'clusters', however it is unclear how this approach will work/be achievable	Advisable to allocate some smaller sites to aid delivery Approach to Village Clusters is unclear
Bidwells (on behalf of Abel homes)	Support	We strongly support the principle of the Settlement Hierarchy and the identification of Horsham St Faith and Newton St Faith as a village cluster in the draft GNLP.	No issues requiring investigation
Bidwells (on behalf of Abel homes)	Support	We fully support the identification of Key Service Centres as locations to accommodate additional growth	No issues requiring investigation
Bidwells (on behalf of Hopkins Homes)	Support	we support the identification of 300 new allocations in Broadland's Main Town to accommodate additional growth	No issues requiring investigation
Members of public (various)	Object	There is insufficient employment to accommodate additional housing, this would require additional travel for work which is environmentally damaging	Investigate evidence from employment study relative to population/housing numbers
Members of public (various)	Object	<ul style="list-style-type: none"> • Village clusters based on primary school vacancies/catchment is poor decision making. • Limited services in villages • Village life has reliance on private car, growth in villages contradicts para 125 which states a need for 'a radical shift away from the use of the private car, with many people walking, cycling or using clean public transport.' That is not feasible. 	<ul style="list-style-type: none"> • Village clusters based on primary school vacancies/catchment is poor decision making. • Limited services in villages • Village life has reliance on private car, growth in villages contradicts para 125 which states a need for 'a radical

			shift away from the use of the private car, with many people walking, cycling or using clean public transport.' That is not feasible.
Members of public (various)	Object	<p>There is insufficient evidence to support the approach taken to continued development in the Districts which is not in accordance with NPPF golden thread of sustainability, just 'more of the same' which has not worked for the past 30 years.</p> <p>There is therefore NO justification for more until proven evidence is available and presented to the Public in a manner which is not partisan and biased, and which will allow real assessment of the true effects of such development to be understood balanced against any benefits.</p> <p>The plan should be completely re-thought. It cannot even be stated that 'growth' has brought about real increases in peoples incomes - with income levels for the median and lower incomes (the vast majority) lower in real terms than 10 years ago.</p>	<p>Lack of evidence to support approach taken.</p> <p>Lack of evidence to justify housing need.</p>
Members of public (various)	Object	To protect the countryside – build out JCS sites first & take a phased approach	See response to issues raised by CPRE
Hainford Parish Council	Object	9/10% additional allocations and windfall is excessive. More than required to meet demand	Explanation/justification required for buffer (considered excessive).
Member of public	Object	In agreement with Hainford Parish Council rep. Also, highlights significant flooding issues in areas of Hainford & feels flood statistics should be reported by village, not by cluster.	Growth does not reflect flooding issues appropriately.
Sworders	Object	Para 168 of strategy states that a significant proportion of the allocated sites are strategic scale commitments of 1000+ homes. Delivery of such sites can have delays	Over reliance on large strategic sites. Suggest

(Registered as comment – but reads as objection)		due to infrastructure requirements Sworder suggest a greater focus should be given to smaller sites, over and above the 10% required by NPPF to offset delays on strategic sites & contribute to 5yr housing land supply.	increase in smaller site allocations to aid delivery.
Members of public (various)	Object	<p>Calculating housing needs based on 2014 National Household Projection rather than more up to date 2016 figures is unacceptable.</p> <p>Change in policy approach from JCS to GNLP, now there is greater development proposed in villages & rural areas with the main justification being the availability of primary school places which is considered inappropriate. The issue of impact upon climate change & post-carbon economy is more significant & undermined by the proposed policy.</p>	<p>Housing need calculations should be based on up to date data (not 2014 data)</p> <p>Concern regarding higher level of development in rural locations – disagree with method of assessment</p> <p>Concern approach has negative impact on climate.</p>
<p>Mrs Janet Skidmore of Carter Jonas LLP</p> <p>Also exact same rep for Noble Foods Ltd by Carter Jonas LLP</p> <p>Also submitted as a comment</p>	Object	<p>It is requested that the draft version of GNLP includes confirmation that the circumstances identified in Paragraph 010 of Id.2a of the PPG have been taken into account for the housing requirement.</p> <p>It is not clear whether the housing requirement for emerging GNLP has considered an uplift to meet affordable housing needs. It is requested that the draft version of GNLP includes confirmation that an uplift to the housing requirement to meet affordable housing needs has been considered and assessed.</p>	<p>Confirmation that PPG has been appropriately regarded is required.</p> <p>Request that the draft version of GNLP includes confirmation that an uplift to the housing requirement to meet affordable housing needs has been considered and assessed</p>

CPRE Norfolk	Object	<p>Not counting windfall coupled with use of 2014 figures to calculate housing need is going to lead to an oversupply of houses. Windfalls should be counted as part of calculation for meeting need.</p> <p>Concern regarding approach to housing numbers in South Norfolk villages – specifically an open-ended minimum of 1,200 homes. The word minimum must be replaced with maximum so that further potential over supply is avoided. Using recent build rates in the area, current commitments cover the actual housing need to 2038.</p> <p>To protect countryside JCS sites should be developed before any new sites are added from the GNLP. This should be phased (JCS first, then GNLP sites) This has been supported by 68 Parish & Town Councils which should not be ignored.</p> <p>There is very little evidence to show that increasing allocated land increases delivery rate. Developers simply cherry pick most profitable sites which are likely to be newly allocated, less sustainable greenfield sites; resulting in land banking current allocations. This would cause environmental impact. It could also result in the recent delivery of additional expensive infrastructure (particularly NDR) provided to facilitate new housing being irrelevant.</p>	<p>Not counting windfall coupled with use of 2014 figures to calculate housing need is going to lead to an oversupply of houses.</p> <p>Approach to SN villages is cause for concern, housing figure should be ‘maximum’</p> <p>GNLP should be phased, requiring delivery of JCS sites first.</p> <p>There is very little evidence to show that increasing allocated land increases delivery rate. Developers simply cherry pick most profitable sites which are likely to be newly allocated, less sustainable greenfield sites.</p>
Member of public	Object	<ul style="list-style-type: none"> • Huge increase in housing build will only detract from the general ambience of Norfolk, including Norwich, as an historic city. • Local authorities encouraged the government should introduce schemes to make better use of existing housing stock, flats over shops, large houses used 	Proposed level of development will be detrimental to character of Norfolk.

		only by one or two people; and of course, to reduce immigration and the birth rate.	Encourage better use of existing housing stock & available buildings. reduce immigration and the birth rate
Member of public	Object	Recent & proposed developments will have increased population of Loddon by 40% since last census with little or no improvement to local facilities – this will increase the local carbon footprint & increased reliance on cars.	Housing growth needs to be supported by increased infrastructure & amenities. Development causes increased reliance on cars & negative impacts on climate.
Saving Swainsthorpe Campaign	Object	Proposed housing numbers are excessive. Support CPRE proposal of phasing sites.	See response to CPRE
Lanpro Services- Stephen Flynn	Object	Concerns regarding deliverability of the large housing commitment making up 82% of requirement to 2038. Current lack of supporting evidence, required by Reg 19 stage. Suggest an increase to proposed housing numbers – City Deal numbers (3000) have not been added to the need figure generated through Standard Methodology. Reference to PPG that standard method is minimum starting point, there are circumstances where it may be appropriate to increase housing need exceeding past trends where growth strategies are likely to be deliverable (where funding is in place).	Lack of supporting evidence to justify delivery. Suggest an increase in housing numbers to facilitate employment growth etc. in recognition of City Deal. Currently insufficient & not in accordance with PPG

		<p>If the GNLP is serious about City Deal, Tech Corridor, LEP & Norfolk & Suffolk Economic Plan for jobs growth then City Deal, Contingency & Windfall should be counted in housing figures, also additional employment land should be allocated in Tech Corridor at Hethel as part of a new Garden Village.</p> <p>Greater clarity should be provided under Policy 1 regarding the housing numbers allocated to Norwich City and its fringe parishes to correspond with the preferred allocations document.</p> <p>Greater clarity is needed regarding the proposed uplift figures. The table in policy 1 includes uplift as a commitment which is confusing when compared to the preferred new allocations tables which also include uplift. This needs to be properly and clearly explained.</p>	<p>(Standard Methodology is minimum starting point.</p> <p>Greater clarity should be provided under Policy 1 regarding the housing numbers allocated to Norwich City and its fringe parishes to correspond with the preferred allocations document.</p> <p>Greater clarity is needed regarding the proposed uplift figures. The table in policy 1 includes uplift as a commitment which is confusing when compared to the preferred new allocations tables which also include uplift. This needs to be properly and clearly explained.</p>
Glavenhill Ltd – Stephen Flynn	Object	Same representation as above	See above
Reedham Parish Council	Object	<ul style="list-style-type: none"> • Windfall should be counted in housing figures to prevent over supply. • JCS site should be built out first • Little evidence to support more land = increased build out rates. • Expectation of phasing development. 	<ul style="list-style-type: none"> • Windfall should be counted in housing figures to prevent over supply.

			<ul style="list-style-type: none"> • JCS site should be built out first • Little evidence to support more land = increased build out rates. • Expectation of phasing development.
Hempnall Parish Council (Two identical representations, one says object, one says comment)	Object	<p>Not counting windfall coupled with use of 2014 figures to calculate housing need is going to lead to an over supply of houses. Windfalls should be counted as part of calculation for meeting need. There is disappointment that the GNLP has not joined other authorities in challenging central government requirement for using 2014 data.</p> <p>Concern regarding approach to housing numbers in South Norfolk villages – specifically an open ended minimum of 1,200 homes. The word minimum must be replaced with maximum so that further potential over supply is avoided. Using recent build rates in the area, current commitments cover the actual housing need to 2038.</p> <p>To protect countryside JCS sites should be developed before any new sites are added from the GNLP. This should be phased (JCS first, then GNLP sites) This has been supported by 68 Parish & Town Councils which should not be ignored.</p> <p>There is very little evidence to show that increasing allocated land increases delivery rate. Developers simply cherry pick most profitable sites which are likely to be newly allocated, less sustainable greenfield sites; resulting in land banking current allocations. This would cause environmental impact. It could also result in the recent</p>	<p>Windfall should be counted in housing figures.</p> <p>Figures should be based on up-to-date data, not use 2014 population projections.</p> <p>Concern about approach taken to South Norfolk villages, also the position stating a minimum figure rather than a maximum.</p> <p>Suggest phasing of sites to protect countryside, JCS sites first, then GNLP new allocations to prevent cherry picking of sites.</p>

		<p>delivery of additional expensive infrastructure (particularly NDR) provided to facilitate new housing being irrelevant.</p> <p>Hempnall Parish Council feels that the current commitment is sufficient development for the plan period & no additional sites are required</p>	<p>(position supported by 68 Parish & Town Councils)</p> <p>Little evidence to support increasing allocated land increases delivery rates..</p> <p>Hempnall Parish Council feels that the current commitment is sufficient development for the plan period & no additional sites are required</p>
Brown and Co.	Object	<p>The proposed numbers or distribution of housing would not provide sustainable development which meets the challenges of climate change or supports a post-carbon economy effectively.</p> <p>The Greater Norwich area has a historic record of poor housing delivery which has only recently improved, largely as a result of large numbers of change of use conversions, and purpose-built student accommodation development.</p> <p>The Draft Plan relies upon 82% of the required housing being delivered on carried forward allocations which have not delivered in the current plan period.</p> <p>This approach places the five-year housing supply in jeopardy and increases the opportunities for non-planned development, which can have detrimental impacts upon infrastructure, character and communities.</p> <p>Government has recognised the role that new garden settlements can have in achieving sustainability and creating communities, where there is no choice</p>	<p>The proposed numbers or distribution of housing would not provide sustainable development which meets the challenges of climate change or supports a post-carbon economy effectively.</p> <p>GNLP area has record of poor delivery.</p> <p>Over reliance on undelivered commitment = not a strong 5yrs position.</p>

		<p>between quality and quantity and green spaces amount to more than token verges and squares.</p> <p>In order to meet housing need and meet climate change targets, more is required than delivering housing units. Rather, the focus is shifted to the creation of beautiful places and vibrant, resilient communities. A new settlement, based on The Garden City Principles, can deliver such communities together with a wide range of employment opportunities, mixed tenure housing, zero-carbon principles, sustainable transport, comprehensive green infrastructure and local food sourcing, together with comprehensive community governance and long-term stewardship.</p>	<p>Support for inclusion of 'new garden settlement'</p> <p>A plan should not just be about housing numbers, but development of beautiful places based on the Garden City Principles. (Assisting in meeting climate change targets)</p>
Barton Wilmore	Object	<p>We broadly support the aims of Policy 1 but would support the Alternative Approach suggested in respect of the need to allow for additional windfall delivery to contribute towards the Plan targets.</p> <p>It is our view that, in light of the plan objectives there may be scope for sites which are already consented (and in some cases where permissions have been implemented) to deliver additional residential units over and above the number consented – subject to the necessary planning approvals.</p> <p>It is our view that such an approach would be particularly appropriate within the Norwich Urban Area where sites are sustainably located</p>	<p>Support alternative approach for windfall delivery to contribute towards plan targets.</p> <p>Potential for uplift in numbers on consented & implemented schemes – particularly in Norwich</p>
Barford Parish Council	Object	<ul style="list-style-type: none"> • The use by Government of the outdated 2014 National Household Projections is leading to unnecessary land allocation for housebuilding. It is not understood why more land is set to be allocated when the 2016 projections of housing need to 2038 will be met by the area of sites currently allocated • Land already allocated for house building should be used up before any new allocated land is used, with a focus on brownfield sites first. 	<p>Figures should be based on up-to-date data, not use 2014 population projections.</p>

			Suggest phasing of sites to protect countryside, JCS sites first, then GNLP new allocations.
South Norfolk Green Party	Object	<ul style="list-style-type: none"> • Para 146 claims strategy 'is informed by consultation feedback' – yet ignores much from previous consultations; even when feedback significantly favoured a particular approach – i.e. approach to counting windfall which shall result in housing oversupply. • Using 2014 data for housing need calculations instead of most up-to-date data will cause further oversupply. • SNDC village clusters should be 'maximum' figure (1200), not 'minimum'. • Growth in villages will not 'support' services but be a drain on them. • JCS allocations should be developed first before any new (emerging) GNLP allocations. Phasing. There is sufficient housing allocated in JCS to meet need. If this approach is not taken, less sustainable greenfield sites will be 'cherry picked' as they are most profitable, brownfield sites will be land banked; this will have negative impact on environment and climate. It could also result in the recent delivery of additional expensive infrastructure (particularly NDR) provided to facilitate new housing being irrelevant • To protect countryside JCS sites should be developed before any new sites are added from the GNLP. This should be phased (JCS first, then GNLP sites) This has been supported by 69 Parish & Town Councils which should not be ignored. 	<p>Concern that claim that strategy is informed by consultation feedback is not accurate with significant point of view being ignored.</p> <p>Figures should be based on up-to-date data, not use 2014 population projections.</p> <p>SNDC village clusters should be 'maximum' figure (1200), not 'minimum'.</p> <p>Growth in villages will not 'support' services but be a drain on them.</p> <p>Suggest phasing of sites to protect countryside, JCS sites first, then GNLP new allocations.</p>

Mulfarton Parish Council	Object	<ul style="list-style-type: none"> • Concern that there is no maximum number for village clusters and notes that at the present build rate current commitments cover actual housing need until 2038. • Do not understand why new areas have to be allocated when the current JCS sites have not all been used and has the potential to allow developers to cherry pick sites. 	<p>SNDC village clusters should set a maximum.</p> <p>Oppose new allocations when existing commitments have not been delivered.</p>
Norwich Liberal Democrats	Object	<p>The plan supports a level of growth in rural areas ‘village clusters in South Norfolk’ – 9% of total housing growth over the plan period - which is very hard to reconcile with Section 4 – The delivery of growth and addressing climate change and Policy 7.1 -Strategy for the areas of growth, and will have impacts for infrastructure provision.’ This approach is inconsistent with the emphasis expressed in the document on addressing climate change and significantly reducing carbon emissions in the Vision and Objectives and Climate Change statement, undermining the ability of the plan to deliver sustainable growth.</p> <p>In addition there is concern about achieving this 9% growth (1,200 homes) in a more difficult village setting where new housing may be resisted.</p> <p>The inclusion in the plan to site the additional housing in the most rural parts of South Norfolk in ‘village clusters’ in the GNLP but at the same time excluding details of those village sites or evidence as to the justification of such a policy may leave the GNLP vulnerable to challenge on soundness grounds at the public examination stage.</p>	<p>Excessive growth in villages (particularly South Norfolk) This approach is inconsistent with the emphasis expressed in the document on addressing climate change and significantly reducing carbon emissions in the Vision and Objectives and Climate Change statement, undermining the ability of the plan to deliver sustainable growth.</p> <p>The inclusion in the plan to site the additional housing in the most rural parts of South Norfolk in ‘village clusters’ in the GNLP but at the same time excluding details of those</p>

			village sites or evidence as to the justification of such a policy may leave the GNLP vulnerable to challenge on soundness grounds at the public examination stage.
Savills for Hugh Crane Ltd.	Object	<p>There appears to be a conflict within the draft Greater Norwich Local Plan in respect of the aspiration to make to most of economic growth potential however only planning for the minimum number of new homes throughout the plan period.</p> <p>References to PPG whereby the standard method identifies a <u>minimum</u> housing need; it does not produce a <u>housing requirement figure</u>. “there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates”.</p>	<p>Conflict in strategy to make most of economic growth whilst only allocating minimum housing numbers possible through standard method.</p> <p>Standard method is starting point, it is likely that more housing is required.</p>
Norwich Green Party	Object	<p>Plan should ensure delivery of JCS allocations before commencing phased development of new sites allocated in GNLP, starting with brownfield sites in Norwich city centre.</p> <p>Linking delivery of affordable housing to that of private sector housing has failed. Planning authorities have maximised housing numbers to obtain affordable housing whilst developers have claimed that achievement of policy quota of 33% affordable housing is unviable. The only solution to addressing affordable housing need is through public policy intervention, in particular national government facilitating social housing.</p>	<p>Suggest phasing of sites to protect countryside, JCS sites first, then GNLP new allocations. New sites should be focused on Brownfield sites, particularly in Norwich.</p> <p>Affordable Housing Policy has not performed to required standard. The only solution to</p>

			addressing affordable housing need is through public policy intervention, in particular national government facilitating social housing
Cllr Julie Neesam	Object	the 9 /10% extra allocations as well as additional windfall sites is excessive given that there are sufficient sites allocated to meet predicted demand.	Buffer to housing numbers is excessive. Existing allocations should provide sufficient housing supply.
Member of public	Object	<p>The evidence of the past 30 years of a growth strategy similar to that which is being proposed, has been unsustainable in terms of its adverse impacts on the environment (traffic density, air pollution, water resource impacts, loss of countryside, damage to biodiversity), society (increased crime, reduced social cohesion, failing schools, failing health services, failing social services) and the lowering in the quality of life for residents resulting from this and other related factors. More of the same is therefore unsustainable and fails the NPPF test in relation to suitable development. The plan should be completely re-thought.</p> <p>It cannot even be stated that 'growth' has brought about real increases in peoples incomes - with income levels for the median and lower incomes (the vast majority) lower in real terms than 10 years ago.</p>	The plan continues along the same lines as previous 30 years which has had adverse impacts on the environment, society and the lowering in the quality of life of residents. The plan needs a new approach.
Pegasus Planning Group on behalf of Peter Rudd	Object	Concerns regarding the reservation of the sites to be allocated for housing in the South Norfolk villages as part of a separate plan-making exercise (South Norfolk Village Clusters Housing Site Allocations document). We consider that it is more appropriate for this to be considered as part of this plan-making exercise so that any issues with the delivery of housing to meet the needs identified can be rectified by an alternative distribution across the hierarchy. The unknown outcome of that exercise could have significant implications for the distribution of housing across the settlements.	Concern regarding South Norfolk villages being part of a separate process: <i>"The unknown outcome of that exercise could have significant implications for the distribution of housing across the settlements"</i>

Crown Point Estate	Object	<p>Concerned that the Plan relies on the, yet to be formulated, South Norfolk Village Clusters Housing Sites Allocation document. Without this, there is no evidence that the GNLP's target numbers can be met, which may well lead to a delay in the GNLP process. Such approach is inconsistent with paragraphs 20 and 23 of the NPPF, which require that Councils make sufficient provision for housing through strategic policies that provide a clear strategy for bringing sufficient land forward.</p> <p>Despite the representation of housing numbers as a minimum figure, the reality at planning application stage is that sites that have not been allocated will be technically contrary to policy. Additionally, the housing numbers should be sufficient to keep up with additional job numbers, anticipated and indeed promoted by the GNLP to facilitate growth. It is therefore imperative that opportunities to allocate sites for housing are taken.</p>	<p>Concern relating to approach to South Norfolk villages, may cause delays, not in accordance with NPPF para 20 & 23.</p> <p>Housing allocations should be sufficient to keep up with additional employment.</p>
Savills on behalf of Barratt David Wilson Homes	Object	<p>There appears to be a conflict within the draft Greater Norwich Local Plan in respect of the aspiration to make to most of economic growth potential however only planning for the minimum number of new homes throughout the plan period.</p> <p>References to PPG whereby the standard method identifies a <u>minimum</u> housing need; it does not produce a <u>housing requirement figure</u>. "there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates".</p> <p>It would appear that the draft Plan is proposing a housing requirement of 44,340 homes over the 20-year plan period – an average of 2,217 dpa, with this then being the requirement against which delivery will be assessed. Alternatively, the wording of Policy 1 could be interpreted such that the requirement is intended to be 40,550 homes – an average of 2,028 (rounded up) dpa. This point should be clarified in any future draft of the GNLP.</p>	<p>Conflict between promoted economic growth & minimum possible housing allocations under standard method.</p> <p>Clarification requested over housing requirement & expected annual delivery as this could be interpreted in two ways.</p>

<p>Pegasus Planning Group on behalf of Barratt David Wilson Homes</p>	<p>Object</p>	<p>If the Councils do not plan for enough homes for the Greater Norwich area it will worsen the existing affordability issues, limit the benefit that the area has for the local and national economy, damage social inclusion, and have negative implications for climate change as people have to travel further to access jobs.</p> <p>We make this comment in the context of a plan that seeks to significantly increase jobs over the plan period and yet suppresses the potential development yield from a site in one of the most sustainable locations within the plan area (i.e. GNLP0307).</p> <p>We support the fact that headline housing numbers have been identified as a minimum figure. However, given the planned growth of the economy of the Greater Norwich area the Local Plan needs to take every opportunity to exceed the minimum figures identified for delivery by maximising the use of land on allocated sites.</p> <p>Serious concern that in order to meet the proposed numbers in the Greater Norwich Local Plan there is reliance on the allocation of several thousand new homes through the South Norfolk Village Clusters Housing Sites Allocation document. Presently there are no details as to how these sites will be allocated or when the document will be prepared. There is no evidence that the new homes will be accommodated in the most sustainable locations or within a timescale that will ensure that the needs identified in the plan will be met.</p> <p>Clearly this approach is inconsistent with paragraphs 20 and 23 of the NPPF, which require that Councils make sufficient provision for housing through strategic policies that provide a clear strategy for bringing sufficient land forward. Without a strategic approach to where these additional allocations are to be located there is no certainty over whether they will deliver sustainable forms of developments. The need to draft and adopt the Housing Sites Allocation Plan will also represent a further delay to the delivery of new homes after the Greater Norwich Local Plan has</p>	<p>Concern that there is insufficient housing allocation to meet the needs of proposed economic growth which could have wider repercussions.</p> <p>Serious concern relating to approach to South Norfolk villages. Not consistent with NPPF, creates uncertainty and potential delay.</p> <p>Recommend a more proactive approach to securing the delivery of new homes to avoid any doubt around delivery timescales and rates on yet to be allocated sites. The most expedient way to provide certainty around delivery of new homes is by ensuring that proposed allocations in the higher order settlements make the most efficient use of land</p>
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		<p>been adopted. This delay, and uncertainty about the delivery of sites has the potential to limit delivery rates in the short and medium term.</p> <p>The Greater Norwich Local Plan needs to take a more proactive approach to securing the delivery of new homes to avoid any doubt around delivery timescales and rates on yet to be allocated sites. The most expedient way to provide certainty around delivery of new homes is by ensuring that proposed allocations in the higher order settlements make the most efficient use of land by increasing densities where it is appropriate to do so.</p>	<p>by increasing densities where it is appropriate to do so</p>
Hingham Parish Council	Object	<p>The consideration of Windfall sites as being “acceptable in principle” – of sites of up to 3 homes within each parish would mean the ACTUAL homes that will be delivered is potentially unquantifiable (Policy 7.5 is ambiguous in its meaning and needs clarification)</p> <p>Housing figures are not discussed in line with actual need within the community or taking into account the number of vacant properties already in existence</p> <p>“deliverability” is a key component to housing development site allocation. The Council would like to state that just because something is deliverable it does not mean that it is right for a community, and there are concerns regarding the push to deliver housing development “en masse” which could potentially overwhelm the town’s facilities and infrastructure.</p> <p>The GNLP runs until 2038 and the Town Council are of the opinion that a phased approach to delivering smaller developments, as and when needed, with a higher focus on affordability for local people would be a more acceptable and appropriate approach.</p>	<p>Windfall sites of up to 3 homes per parish requires clarification.</p> <p>Housing figures do not relate to local community need.</p> <p>Deliverability is not the same as appropriateness.</p> <p>The GNLP runs until 2038 and the Town Council are of the opinion that a phased approach to delivering smaller developments, as and when needed, with a higher focus on affordability for local people would be a more</p>

			acceptable and appropriate approach.
David Lock Associates on behalf of Orbit Homes	Object	<p>The GNLP approach to identifying the housing need for the area does not take a proactive approach; moreover, it risks inhibiting the economic and jobs growth that has been agreed as part of the City Deal, and more importantly the recent growth trends that have been evident.</p> <p>Detailed representation outlining how the use of the standard method minimum is considered inadequate calculation for actual housing need in GNLP area</p> <p>Simply meeting the need implied by the method would also prompt a 16% reduction in the annual rate of housing delivery belatedly achieved over the past three years, when adopted housing targets were met for the first time. Such a reduction is unjustified at a time when the Government remains committed to significantly boosting housing supply and in light of the GNLP objectives to encourage growth and support the Tech Corridor.</p> <p>Given the economic objectives and wider strategies and commitments to significant jobs growth in Greater Norwich, it is concerning also that with no adjustment for this, simply meeting the need implied by the method would likely grow the labour force and support in the order of 37,000 new jobs. Whilst this supposedly surpasses the target proposed in the Draft Plan (33,000), it falls short of the job growth that can be reasonably expected to result from an ongoing economic growth strategy.</p> <p>The GNLP target is considered inadequate in this regard, given that it is derived from an unjustified and unduly simplistic manipulation of a scenario presented in an evidence base document which is now comparatively dated and pre-dates the revised NPPF. Equally, as a result of the datedness of the informing analysis, it is considered to fail to adequately reflect the strong economic context which Greater</p>	Strong objection to calculation of housing need and supporting evidence.

		<p>Norwich has demonstrated for a sustained period of time or the full impact of planned investment.</p> <p>we consider that GNDP must update their evidence base prior to the next stage of consultation on the emerging Local Plan, to comply with the NPPF and PPG. This should properly evaluate the level of job growth that is likely in Greater Norwich, taking recent successes – no doubt linked to the City Deal and other initiatives – into account while Considering the prospects for long-term growth beyond “business as usual” in key locations and sectors. A related assessment of housing needs should also be produced, to locally test the minimum need implied by any standard method in and ensure that the housing needed to support a growing economy can be planned for.</p> <p>GNDP also appear to have misconstrued the supply-led buffer proposed as part of its housing requirement, claiming that it provides flexibility to accommodate the consequences of successful investment strategies. In this context, the PPG (PPG Reference ID: 2a-010- 20190220) is explicit in recognising that where authorities should consider the appropriateness of a higher housing need figure: “This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan)”</p> <p>Representation disagrees with the rationale for not producing a higher need figure relating to historic delivery.</p> <p>Recent rates of delivery have exceeded the current plan target. As such, there is no justification for suggesting that deliverability concerns represent a valid reason for dismissing the appropriateness of a higher figure.</p>	
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Salhouse Parish Council	Object	<p>Not counting windfall coupled with use of 2014 figures to calculate housing need is going to lead to an oversupply of houses. Windfalls should be counted as part of calculation for meeting need.</p> <p>Concern regarding approach to housing numbers in South Norfolk villages – specifically an open-ended minimum of 1,200 homes. The word minimum must be replaced with maximum so that further potential over supply is avoided. Using recent build rates in the area, current commitments cover the actual housing need to 2038.</p> <p>To protect countryside JCS sites should be developed before any new sites are added from the GNLP. This should be phased (JCS first, then GNLP sites) This has been supported by 69 Parish & Town Councils which should not be ignored.</p> <p>There is very little evidence to show that increasing allocated land increases delivery rate. Developers simply cherry pick most profitable sites which are likely to be newly allocated, less sustainable greenfield sites; resulting in land banking current allocations. This would cause environmental impact. It could also result in the recent</p>	<p>Up to date data should be used in calculation of housing need.</p> <p>Windfall should be included in housing numbers.</p> <p>Concern relating to approach taken to South Norfolk villages.</p> <p>Suggest phasing of sites – JCS should be built out first before new allocations can be built.</p>

		delivery of additional expensive infrastructure (particularly NDR) provided to facilitate new housing being irrelevant.	Little evidence that increased land availability results in increased delivery.
RJ Baker & Sons	Comment	<p>Housing growth strongly based upon delivery in Norwich Urban Area – can this be supported?</p> <p>Query figure associated with Village Clusters, in the absence of SN is this figure achievable or suitable?</p> <p>Approach to Contingency sites is confusing & is not explained in the Strategy: Why Costessey, Why 1000, how is ‘low delivery’ to be measured. (Support for contingency in Wymondham)</p>	<p>Clarification of Norwich’s ability to accommodate majority of growth</p> <p>South Norfolk village numbers create uncertainty.</p> <p>Explanation of approach to contingency sites</p>
Barton Wilmore on behalf of Berliet Limited	Comment	<p>We broadly support the aims of Policy 1 but would support the Alternative Approach suggested in respect of the need to allow for additional windfall delivery to contribute towards the Plan targets.</p> <p>It is our view that, in light of the plan objectives there may be scope for sites which are already consented (and in some cases where permissions have been implemented) to deliver additional residential units over and above the number consented – subject to the necessary planning approvals.</p> <p>It is our view that such an approach would be particularly appropriate within the Norwich Urban Area where sites are sustainably located</p>	<p>Support alternative approach to include windfall in plan targets.</p> <p>Potential for increased delivery from consented & implemented sites – particularly sustainably located in Norwich.</p>
Bidwells on behalf of Welbeck Strategic Land III LLP	Comment	<p>Whilst the principle of identifying the Norwich urban area as the focus for most of the identified housing growth is supported, the ability of existing allocations / commitments, as well as certain new allocations, to deliver the scale of growth forecast is, without the provision of clear evidence demonstrating the delivery of certain sites in accordance with criteria contained within the NPPF, questioned. This</p>	<p>Provision of evidence demonstrating deliverability of carried forward & some new allocations is required as</p>

		<p>is highlighted by the fact that the draft Local Plan states at various locations that there is uncertainty regarding the delivery of 1,200 dwellings at the Carrow Works site in Norwich.</p> <p>there is considerable doubt as to whether there is clear evidence that large strategic sites that are identified as ‘existing deliverable commitments’ can be relied on. Similarly, there is, as acknowledged by the draft Local Plan and detailed above, doubt as to whether certain strategic allocations within the Norwich Urban Area, notably Carrow Works (1,200 units), can be delivered.</p>	<p>there is a degree of uncertainty.</p>
Persimmon Homes (Anglia)	Comment	<p>The approach to housing numbers appears to be sound, but we note that the draft plan proposes to allocate sites that already have the benefit of having been granted planning consent. There is a need to ensure that the deliverable housing commitment figure does not double count those sites proposed for allocation and those sites that already benefit from an extant planning permission, which will ensure that the housing commitment is sufficient to meet the identified need.</p> <p>The approach to providing allocations in village clusters in South Norfolk within a separate plan is questioned and serves to add uncertainty regarding the ability of the plan to allocate sufficient sites to meet housing need across the Greater Norwich area over the plan period. A better approach would be to run consultation on all GNLP sites simultaneously.</p>	<p>Need to ensure that there is no double counting of commitment & allocations which have extant consent.</p> <p>Concern relating to approach taken to South Norfolk village sites.</p>
RSPB (East of England Regional Office)	Comment	<p>Paragraph 144 places an emphasis is on providing for future human generations. There is a need to place the same value on nature which fulfils its own function, not just one for humans to enjoy and appreciate.</p> <p>Increased housing in the plan area will impact adjacent areas outside of the plan. There will be increased pressure on facilities within the Broads National Park as a result of residents from new developments leading to increased disturbance on designated spaces & increased wear & tear on infrastructure.</p>	<p>Plan should meet the needs of nature in the future, not just humans.</p> <p>Increased housing impacts locations outside the plan area – it cannot be considered in isolation.</p>

		<p>The Greater Norwich area can't be viewed in isolation to surrounding areas managed by other authorities.</p> <p>HRA Conclusions that plan will not have adverse effects on integrity of Natura 2000 & Ramsar sites is based on incomplete evidence – compromises soundness of plan (also relative to Q21)</p>	<p>HRA Conclusions that plan will not have adverse effects on integrity of Natura 2000 & Ramsar sites is based on incomplete evidence – compromises soundness of plan.</p>
Home Builders Federation	Comment	<p>Local housing needs assessment: for the Greater Norwich area the Councils have used the annual household growth between 2019 and 2029. Whilst we recognise that the Government states that the current year should be the base date from which to assess needs if the Councils wish to start their plan from 2018 then it would be logical for the base period of the assessment of household growth to be the 2018 to 2028 period. This would result in a LHNA of 41,040. Slightly higher than the 40,550-figure suggested by the Council.</p> <p>GMLP should liaise with neighbouring councils to ensure they are meeting their housing needs (NPPF para 60).</p> <p>PPG advises there may be instances where housing need is higher than standard method. This may be the case due to the City Deal. On the basis of the proposed requirement of 2,027 dpa there will be a shortfall of circa 6,500 homes. It will therefore be important that the Councils seek to ensure that there are sufficient sites allocated in GMLP that can deliver homes in the first five years post adoption to meet the commitments in the City Deal.</p> <p>9% buffer & approach to windfall welcomed.</p> <p>Suggest some smaller contingency sites as well as larger contingency sites</p>	<p>Local housing need assessment should use 2018 base date, not 2019.</p> <p>Liaise with neighbouring councils to ensure needs are met.</p> <p>Housing need is minimum possible using standard method & may fall short of actual need (City Deal etc.)</p> <p>9% buffer & approach to windfall welcomed.</p> <p>Suggest some smaller contingency sites as well as larger contingency sites</p>

<p>Strutt & Parker LLP on behalf of M Scott Properties Ltd. REPRESENTATION SUBMITTED TWICE</p>	<p>Comment</p>	<p>In developing the new Greater Norwich Local Plan, it will be important that an adequate mix of sites is promoted including a proportion of smaller sites as well as sites to meet specific housing needs (including housing for older people)</p> <p>9% buffer & approach to windfall welcomed. (However could typically be expected up to 20%)</p> <p>Given the uncertainty around the Carrow Works site (1,200 homes), it would be advisable to allocate smaller sites up to c. 25 units (c. 1 ha) across the Plan area to help boost the supply of new homes. The Plan aims to comply with paragraph 68 of the NPPF by accommodating at least 10% of the housing requirement on sites no larger than 1 ha, however, where there are reasonable alternatives available these should be included to maintain supply and avoid the need to rely on less certain strategic sites or large contingency sites.</p> <p>The Government’s recently published housing delivery figures for 2019 indicate delivery for the Greater Norwich area comprising Broadland, Norwich and South Norfolk to be at 140%. This is very encouraging, however, housing delivery can be fragile and susceptible to changes in the economy or delays in the delivery of key infrastructure necessary for strategic sites to come forward.</p> <p>Detail on Village Clusters is provided at Appendix 5 of the Draft Strategy, as the preferred option the Council consider that a ‘cluster approach better reflects the way people access services in rural areas and enhances social sustainability by facilitating levels of growth in small villages’ This statement is supported, however it is unclear how this approach will work effectively within the Plan area and how achievable it will be. As such, a focus should be made on small and medium sites. The distribution of growth to a variety of sites will enable a steady delivery of homes and ensure the District can meet its housing targets throughout the Plan period.</p>	<p>Suggest adequate mix of sites including smaller sites to meet specific needs.</p> <p>Buffer welcomed, but could be expected to be larger (20%)</p> <p>Given uncertainties, it would be advisable to allocate smaller sites up to c. 25 units (c. 1 ha) across the Plan area to help boost the supply of new homes.</p> <p>Delivery rates can fluctuate.</p> <p>Uncertainty regarding approach to South Norfolk villages.</p>
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<p>Pegasus Group on behalf of Pigeon Investment Management Ltd.</p> <p>REPRESENTATION REGISTERED FOUR TIMES</p>	<p>Comment</p>	<p>It is apparent that the standard method has been miscalculated within the Draft Local Plan as it is below the minimum local housing need of either 41,379 or 41,361 (calculations greatly detailed in rep.).</p> <p>Policy 1 and all other references to a need for 40,550 are therefore not justified nor are they consistent with national policy.</p> <p>Furthermore, the Government has identified that it intends to review the standard method by September 2020. As the Local Plan is not intended to be submitted for examination until June 2021, it is likely that the Local Plan will need to respond to the new standard method, whatever that may be.</p> <p>Employment land will also have an upward impact on housing need</p> <p>Concerns with housing distribution in hierarchy with over reliance on Norwich & Urban Fringe. The required delivery in Norwich over the plan period is in line with what has been achieved in the whole greater Norwich area & is unrealistic. If the necessary boost to housing supply is to be achieved this will require a greater range and choice of sites across all of the sustainable settlements within the plan area.</p> <p>Reliance on large brownfield sites delivering within plan period is slim. Strategic urban extensions can also take time to deliver due to infrastructure requirements.</p> <p>The Councils have not produced evidence to substantiate the delivery trajectory of the brownfield regeneration sites or the urban extensions in the Norwich Urban Area. We reserve the right to comment further on this matter at the Regulation 19 consultation stage. Delay in delivery at either source of supply could prejudice the delivery of the housing requirement of the GNLP and therefore go to the soundness of the plan.</p>	<p>Calculation of housing need / standard methodology has been miscalculated, the figure reached is not justified nor consistent with National Policy. Standard method is likely to require review following Government update.</p> <p>Employment land will also have an upward impact on housing need</p> <p>Concerns with housing distribution in hierarchy with over reliance on Norwich & Urban Fringe – which is also unrealistic.</p> <p>The Councils have not produced evidence to substantiate the delivery trajectory of the brownfield regeneration sites or the urban extensions in the Norwich Urban Area.</p>
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		<p>Concerns that more homes are proposed in Village Clusters than Key Service Centres.</p> <p>Without certainty over the supply of land to deliver such a quantum of development in South Norfolk Village Clusters the soundness of the spatial strategy is questionable. As a percentage of the overall new housing allocations in the Reg 18 GNLP the current spatial strategy delegates approximately 15% to a document outside of its control (1200/7,840). This is not considered to be a reasonable approach and prejudices the delivery of the emerging GNLP by 2038.</p> <p>In failing to provide an increased number of dwellings at Main Towns and Key Service Centres the Councils are also missing the opportunities presented by Pigeon to provide new community facilities that can support existing and proposed new development in sustainable locations for the plan period and beyond.</p> <p>The preceding representations on the Spatial Strategy are all set in the context that the identified housing need does not even accord with the minimum set by national policy and does not take account of the needs of specific groups. It is therefore evident that the quantitative elements of the Spatial Strategy will need to be revised to ensure that housing needs can be met across the GNLP area. This should be achieved through directing more growth to the Main Towns and Key Service Centres to counterbalance the disproportionate levels of growth proposed within the Norwich urban area and Village Clusters.</p>	<p>Concerns that more homes are proposed in Village Clusters than Key Service Centres.</p> <p>Without certainty over the supply of land to deliver such a quantum of development in South Norfolk Village Clusters the soundness of the spatial strategy is questionable.</p>
<p>Armstrong Rigg Planning on behalf of Westmere Homes</p>	<p>Comment</p>	<p>Concerns in respect of the housing strategy set by the plan, both in terms of the basic housing target and the way in which these are to be delivered. In short, these concerns relate to the less than aspirational housing figures included in the plan and a failure to recognise the significant growth that an escalation in local job creation will place on the housing market.</p>	<p>concerns relating to the less than aspirational housing figures included in the plan and a failure to recognise the significant growth that an escalation in local job creation will</p>

	<p>the plan should be doing more to seize on the challenges and opportunities presented by two key economic growth strategies in the region, ensuring that ambitions can be achieved</p> <p>Essentially the plan’s housing requirement comprises close on the bear minimum policy-compliant figure required by the NPPF and certainly does little to recognise additional known factors that will no doubt influence the demand for new homes across the plan area.</p> <p>PPG states standard method calculation is a minimum, citing growth strategies & strategic infrastructure as an opportunity to set a higher housing requirement – both apply to Greater Norwich. The development requirements of the Deal have been facilitated in part by the allocation of 3,000 additional homes in the adopted Growth Triangle Area Action Plan (GTAAP) the delivery of these strategic housing sites has been slow. To this end the emerging GNLP offers the opportunity to provide fresh stimulus to achieving the ambitions of the City Deal prior to 2026 to make up for any shortfall in new jobs and housing.</p> <p>It does not, however, appear that the plan has grasped this opportunity. Indeed, Norwich City Council in its report to its Sustainable Development Panel on 15th January 2020, raises identical concerns, stating that “the level of growth proposed in the GNLP is considered insufficient to address the growth needs of Greater Norwich as a whole and the Norwich Urban Area in particular, and lacks the ambition expressed through the previous Joint Core Strategy and the Greater Norwich City Deal” .</p> <p>Secondly, it is vital that the GNLP responds to the ambitions of the Cambridge Norwich Tech Corridor (CNTC), the vision of which seeks to attract 26,000 additional jobs and 46,000 further residents to the corridor prior to 2031. At this stage it is apparent that, whilst the CNTC proposals would be hugely positive for the city area, they currently represent what is still little more than an aspirational programme for</p>	<p>place on the housing market.</p> <p>The strategy of skewing the delivery of new homes which are already required to meet the needs of the local population towards the corridor to satisfy the CNTC’s aspiration does not represent a positive planning response. Instead this will simply create an imbalance in housing delivery across the plan area.</p> <p>To simply maintain a figure close to the basic LHN as the need housing figure for the plan demonstrates a critical misunderstanding of the way in which the figure is calculated.</p> <p>Detailed alternative calculation presented with significant increase in housing figures.</p>
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		<p>growth with limited delivery mechanisms in place. This is where the GNLP must play a major role in making the CNTC vision a reality.</p> <p>To the plan's credit it is noted that the spatial distribution of growth included in the draft strategy orientates a high proportion of the plan area's homes towards the corridor. What is a concern, however, is that the overall housing target for the plan fails to recognise that the CNTC proposals, and the significant investment and jobs growth that will hopefully come with them, will likely result in an increased housing demand above and beyond the baseline requirement calculated using the Government's Standard Methodology. The strategy of skewing the delivery of new homes which are already required to meet the needs of the local population towards the corridor to satisfy the CNTC's aspiration does not represent a positive planning response. Instead this will simply create an imbalance in housing delivery across the plan area.</p> <p>To simply maintain a figure close to the basic LHN as the need housing figure for the plan demonstrates a critical misunderstanding of the way in which the figure is calculated. Indeed, the absence of an appropriate uplift fails to reflect the fact that the standard method is a 'policy off' calculation of the housing requirement and any adjustments required to due to 'policy on' decisions (i.e. to sign a City Deal) should be factored in further.</p> <p>we consider that the OAN proposed by the plan falls short of adequately responding to local demand by an approximate 5,400 homes. This is before the additional demand generated by the CNTC is taken into account. In which case the absolute minimum housing requirement for the GNLP should be somewhere in the region of 46,000 dwellings before any NPPF paragraph 73 buffer is applied. In which case it is our view that upon the application of the appropriate buffer the GNLP should be planning for somewhere between 48,300 and 50,600 dwellings as a minimum based on the demand generated by the City Deal alone. In addition, we would urge officers</p>	
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		to undertake the work necessary to quantify the impact of the CNTC – the draw of the Corridor will inevitably result in the eventual housing figure rising further.	
Barton Willmore	Comment	<p>Representation details circumstances whereby an increased level of housing need could be calculated – giving examples of how this applies to GNLP districts including the City Deal, economic growth. The SHMA advises additional homes to accommodate this; the GNLP currently does not include this uplift in calculation in housing need.</p> <p>Strongly recommend a 20% buffer is applied</p> <p>Housing need should be 49,000-54,000, this growth should be directed to sustainable locations such as Norwich-Cambridge Tech Corridor.</p> <p>The ‘alternative approaches’ to housing numbers identifies that whilst the NPPF encourages a higher housing requirement, this is not the preferred option as evidence of delivery over the medium and longer term suggests that higher targets are unlikely to be achievable or deliverable. We do not believe this position is evidenced, and in fact past poor delivery has been as a result of incorrect sites being allocation and an overreliance on sites within the Growth Triangle</p>	<p>Housing need calculation incorrectly calculated. Detailed alternative calculation provided with significant increase in housing need demonstrated.</p> <p>Do not believe position that evidence supporting lower housing figure is evidenced accurately, and in fact past poor delivery has been as a result of incorrect sites being allocation and an overreliance on sites within the Growth Triangle</p>
Gladman Developments	Comment	<p>Concern regarding the use of standard method to produce housing need figure. This is a minimum requirement. Outlines PPG paragraphs which advise where a higher housing need can be calculated; City Deal & its links to employment have not been considered.</p> <p>Over reliance on large strategic sites</p> <p>Support for surplus (Buffer), but recommend this should be increased to 20%</p>	<p>Housing need calculation under estimates actual need.</p> <p>Over reliance on large strategic sites.</p> <p>Recommend larger buffer</p>

		Further clarification required relating to how the contingency sites will work. Preference is for contingency sites to be included as housing allocations in the plan reducing need for further review.	Further clarification required relating to how the contingency sites will work. Preference is for contingency sites to be included as housing allocations in the plan reducing need for further review.
Highways England	Comment	The number of housing for annual target around two thousand is very high which may become a road junction capacity issue within medium to long term delivery target.	Annual delivery target is high which may be capacity issue for Highways.
Broadland Green Party	Comment	Lack of evidence to justify population increase, as birth rates are declining, population rises must be through inward migration to the area. Population increase has negative impact upon environment. House numbers linked to employment creation – what comes first? Economic growth at the expense of environmental impact is neither a welcome nor sustainable way to plan for our future. Housing should be affordable (including social housing) for those who need it and the elderly.	see summary
Saxlingham Nethergate Parish Council	Comment	Consultation feedback has not been taken on board by not counting windfalls in the calculation of housing numbers. Concern regarding approach to SNDC Village Clusters, no total figure. ‘Minimum’ should be replaced with ‘Maximum’	see summary

		<p>Phasing of allocations. JCS allocations should be developed first before any new allocations are allowed to be developed.</p> <p>Little evidence that more land availability increases delivery of housing – simply results in cherry picking of profitable sites. This may attract development to greenfield sites & away from sites connected to recently delivered infrastructure.</p>	
Pegasus Group	Comment	Concerns relating to the calculation of housing need using the standard methodology. Suggestion that this has not been carried out correctly and requires review which would result in higher figure of housing need in the plan area.	Housing need calculation is incorrect & too low. Requires review
Rosconn Group	Comment	<p>Concern regarding the use of standard method to produce housing need figure. This is a minimum requirement. Outlines PPG paragraphs which advise where a higher housing need can be calculated; City Deal & its links to employment have not been considered.</p> <p>Over reliance on large strategic sites</p> <p>Support for surplus (Buffer), but recommend this should be increased to 20%</p> <p>Further clarification required relating to how the contingency sites will work, their nature, deliverability and distribution throughout the plan area.</p>	see summary

QUESTION 15

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 15 - Do you support, object or wish to comment on the approach for the Economy?
TOTAL NUMBER OF REPRESENTATIONS:	26
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	4 Support, 7 Object, 15 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Brown & Co.	Support	The Food Enterprise Park will deliver a large amount of employment in a rapidly growing sector. This would be supported & enhanced by the proposed new settlement at Honingham Thorpe providing the opportunity for a holistic approach with a mutually supportive provision of jobs, education and housing which would help to attract skilled workers, companies and investment.	No issues requiring investigation
Watkin Jones Group	Support	support the objectives for creating a vibrant and inclusive area that is enhanced by new homes, infrastructure and environment.	No issues requiring investigation
La Ronde Wright Limited	Support	General support for the approach in policy one, subject to the following: “An additional insert is required in support of appropriate growth and expansion of existing businesses and live-work units taking account of current trends and increase in home working.” The policy lacks support for and provides an insufficient response to new and changing business needs.	Additional wording required to support appropriate growth and expansion of existing businesses and live-work units taking account of current trends and

			<p>increase in home working</p> <p>policy lacks support for and provides an insufficient response to new and changing business needs</p>
Orbit Homes/David Lock Associates	Support	<p>Support general approach to economy & welcome the recognition of the Tech Corridor.</p> <p>Concern that the Plan is not optimistic enough in making provision for economic growth, both in planning for sufficient jobs and planning for sufficient housing to support these jobs.</p> <p>The Employment, Town Centre and Retail Study is now comparatively dated & should be updated to ensure it is based on up-to-date economic datasets.</p> <p>The GNDP approach to manipulate the previously evidenced job forecast fundamentally fails to take into account the approach taken to generate the enhanced growth scenario or its forecast of job growth over the long-term.</p> <p>Question whether there is potential to achieve higher growth than estimated in GNLP. The suggestion that higher levels of growth would not be achievable does not stand up to scrutiny – recent employment trends exceed to proposals.</p> <p>Given an evolving economic strategy context, the reliance on forecasts presented within a study produced in 2017 creates a concerning risk that the latest understanding of this growth potential is not fully captured. The strength of the local economy in creating new jobs would imply that whilst it represents an ‘enhanced’ outlook of growth it appears unduly modest when compared to this historic success.</p>	<p>Plan is not optimistic enough in making provision for economic growth, both in planning for sufficient jobs and planning for sufficient housing to support these jobs</p> <p>The Employment, Town Centre and Retail Study needs updating. Concern that evidence has been manipulated.</p> <p>The suggestion that higher levels of growth would not be achievable does not stand up to scrutiny – recent employment trends exceed to proposals.</p>

		We therefore, consider that to support the enhanced levels of economic growth that are evidently capable of being achieved and should be encouraged, the Plan should seek to make further provision for employment opportunities and these should be well located to the economic priority area – most significant the Tech Corridor. Supporting the continued success of Norwich Research Park should also be a key objective and should be promoted through ensuring new homes as well as complementary employment opportunities are made available at SGV	
Stephen Flynn – Lanpro Services	Object	<p>The employment growth target is stated as 33,000 jobs for the plan period. Paragraph 55 states that 29,100 jobs were delivered 2011-2018. The previous regulation 18 Growth Strategy consultation suggested a target of 45,000 jobs for the new plan period based on the East of England Forecast Model (EEFM) and City Deal (13,000 more than JCS target). The GVA Grimley Study 2017 suggested 44,000 jobs would be needed. There is no explanation in the draft document for the significant reduction other than it is based upon the EEFM. This should be explained and justified.</p> <p>Lanpro, therefore, consider that the employment growth target number should be more ambitious and would suggest that the previously specified 45,000 figure still remains appropriate. The number should be specified within Policy 1 which currently does not include any target figure.</p> <p>Suggest focus intensity on Tech Corridor</p> <p>The emerging GNLP will be reliant upon an employment land supply that is not flexible or diverse enough; that is not ambitious enough; is made up of key sites which either have infrastructure constraints to delivery, or have other environmental constraints to expansion; and as such the emerging GNLP plan will conflict with the NPPF and is unsound.</p>	<p>There is no explanation in the draft document for the significant reduction other than it is based upon the EEFM. This should be explained and justified.</p> <p>Employment growth target should be more ambitious.</p> <p>Employment land issues which conflict with NPPF – Soundness issues</p>
Stephen Flynn – Glavenhill Ltd.	Object	The employment growth target is stated as 33,000 jobs for the plan period. Paragraph 55 states that 29,100 jobs were delivered 2011-2018. The previous regulation 18 Growth Strategy consultation suggested a target of 45,000 jobs for the new plan period based on	There is no explanation in the draft document for the significant

		<p>the East of England Forecast Model (EEFM) and City Deal (13,000 more than JCS target). The GVA Grimley Study 2017 suggested 44,000 jobs would be needed. There is no explanation in the draft document for the significant reduction other than it is based upon the EEFM. This should be explained and justified.</p> <p>Glavenhill, therefore, consider that the employment growth target number should be more ambitious and would suggest that the previously specified 45,000 figure still remains appropriate. The number should be specified within Policy 1 which currently does not include any target figure.</p> <p>Suggest focus intensity on Tech Corridor</p> <p>The emerging GNLP will be reliant upon an employment land supply that is not flexible or diverse enough; that is not ambitious enough; is made up of key sites which either have infrastructure constraints to delivery, or have other environmental constraints to expansion; and as such the emerging GNLP plan will conflict with the NPPF and is unsound.</p>	<p>reduction other than it is based upon the EEFM. This should be explained and justified.</p> <p>Employment growth target should be more ambitious. Suggest increased focus on Tech corridor.</p> <p>Employment land issues which conflict with NPPF – Soundness issues</p>
Horsham Properties Ltd. (Also registered as comment)	Object	<p>Representation refers to Policy 6 but is relevant to policy 1.</p> <p>A revision to the approach to the economy in policy 1 and policy 6 is requested. The policy should be revised to allow more flexibility for the expansion of existing small and medium sized employment sites.</p> <p>There is inconsistency between policy 1 & 6, with policy 1 supporting windfall development whilst policy 6 supports allocation and retention of smaller scale sites – but does not allow for expansion.</p>	<p>Policy should be revised to allow more flexibility for the expansion of existing small and medium sized employment sites.</p> <p>Inconsistent approach between Policy 1 & Policy 6.</p>
Norwich Green Party	Object	<p>Sites with good access to rail and public transport, walking and cycling facilities should be given preference. Too many strategic employment sites reliant on car and lorry use have</p>	<p>Too many strategic employment sites reliant on car and lorry use</p>

		<p>been permitted, adding to carbon emissions e.g. Longwater, Broadland Business Park, Norwich Research Park, Easton/Honingham, Hethel.</p> <p>Employment sites not required should be de-allocated. The JCS failed to achieve sustainable development and the draft GNLP is continuing along a business as usual path.</p>	<p>have been permitted, adding to carbon emissions – greater focus on sustainable transport is advised.</p> <p>Employment sites not required should be de-allocated.</p>
Member of public	Object	<p>The GNLP appears to be concentrate on developments in Broadland and South Norfolk both for employment and housing increasing reliance on private transport ignoring the vision for Norwich by the City Council. The consultation lacks clarity for the future of Norwich and its relationship with the rest of the county. The predominance of employment and retail at the edge of the city coupled with the policy of more rural housing suggest the county is intended as a dormitory to the economic fringes of Norwich and acceptance of the continued decline of the city centre.</p> <p>The Plan ignores the concerns in the Norwich Economic Strategy of the unimplemented B1 office consents in Broadland and simply adds more employment provision to the north of Norwich.</p> <p>This is a fundamental flaw in considering Greater Norwich in isolation to the rest of the county. Large numbers of the working population of Norwich live over 20 miles away from their workplace. The pool of qualified labour already exists in the larger towns and surrounding areas and it would seem logical that employment land is made available there rather than all in Norwich.</p> <p>The Travel to Work Area (TTWA) for Norwich in the 2018 Norwich Economic Assessment covers a much wider area than that of Greater Norwich.</p>	<p>Employment based in urban fringe has negative impact on climate & causes decline of Norwich City Centre – policy appears to ignore vision for Norwich by the City Council.</p> <p>Greater Norwich should be considered in the context of the whole county.</p> <p>Norfolk has a historic low level of unemployment and therefore an inability of available labour to fulfil these ambitions, resulting in competition</p>

		<p>There are several large towns within the Norwich TTWA both within and outside the Greater Norwich area which are completely ignored in the consultation. What is the model and vision for these towns and the rest of the county?</p> <p>Historically, the rural hinterland has been attracted to the major local towns and villages for employment and shopping. The policy of concentrating employment in Norwich and the endless rise in personal transport now attracts this population to the City to the detriment of the towns.</p> <p>Any consultation solely centred on Greater Norwich will continue the decline of Norfolk's towns. I contend that the economy of the county is the most important contributory factor to the prosperity of Norwich. I therefore contest that the GNLP proposals present a coherent plan and are sustainable.</p> <p>I am concerned at the over-simplistic principles for growth and the employment agenda arising therefrom. Growth seems to be assumed to be limited to more people employed preferably at higher income jobs.</p> <p>The fallacy of this approach is that Norfolk has a historic low level of unemployment and therefore an inability of available labour to fulfil these ambitions, resulting in competition with other regions for this extra labour leading to inward migration. This in turn leads to more demand for housing and infrastructure. The housing need numbers in the consultation would be significantly less without this inward migration.</p> <p>It is acknowledged that land should be made available for employment opportunities but unfortunately the consultation does not indicate what the drivers for the locations proposed are and the impact elsewhere.</p>	<p>with other regions for this extra labour leading to inward migration. This in turn leads to more demand for housing and infrastructure. The housing need numbers in the consultation would be significantly less without this inward migration.</p>
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Crown Point Estate	Object	Policy 1 refers to the allocation of smaller scale employment sites within built up areas, but misses the opportunity to support the allocation of sites where the conversion of existing rural buildings would contribute to employment in lower value sectors, where premium locations would prevent such businesses from establishing.	see summary
Hingham Parish Council	Object	<p>Allocation of employment locations should be considered in relation to allocation of preferred sites for housing development, and it should be considered how the 2 areas would impact on each other both positively and negatively.</p> <p>There appears to be no time scales with regard to the development of employment areas - i.e. when would the jobs be delivered?</p>	<p>Employment land should be considered in relation to housing land both positively & negatively.</p> <p>No timescales – what comes first – employment or houses?</p>
Rosconn Group (Registered as 'comment', but I	Object	It is not clear whether the economic growth ambitions of Policy 6 are fully consistent with the housing requirement set out within the Plan. Moreover, is there any evidence to indicate that 40,541 dwellings in the period to 2038 is sufficient to support the economic	the economic objectives are not deliverable, justified or effective due

think it fits more into objection)		aspirations of the emerging Plan to 2038? Until such time as this is clarified, we wish to maintain an objection that the economic objectives are not deliverable, justified or effective due to a lack of suitable housing for the employees required to service future jobs growth or otherwise, there is likely to be an increase in in-commuting to the area from outside in order to service these newly arising jobs which would not be a sustainable approach to adopt.	to a lack of suitable housing for the employees required to service future jobs growth or otherwise, there is likely to be an increase in in-commuting to the area from outside in order to service these newly arising jobs which would not be a sustainable approach to adopt.
RJ Baker & Sons / Cheffins(Agent)	Comment	Support for employment land at Browick Interchange, Wymondham.	No issues requiring investigation
Hingham Parish Council	Comment	Siting a housing development so close to a “employment area” which is already home to heavy industry can have many negative impacts on residents, with regard to road safety, increased traffic in a confined area, noise and pollution. It should also be recognised that employment does not occur in just one designated area within a community.	Employment (industrial)_ can have negative impacts on housing land
UEA Estates & Buildings / Bidwells	Comment	Whilst it is appreciated that the UEA does not solely comprise a strategic employment location, it is suggested that the policy is amended to reflect the valuable role which the UEA provides to the Norwich and UK economy. The UEA contributes £1.04 billion to the UK economy, of which £468 million is retained within Norwich.	Policy should recognise importance of UEA in local economy
Barton Willmore for Norwich International Airport	Comment	Norwich Airport partly supports Policy 1 as the Airport area is considered a strategic employment location. It is ideally located on the strategic road network. The Site is suitable to support a wide range of economic sectors, helping to contribute to the delivery of 33,000 additional jobs throughout the Plan period.	Norwich Airport would question the assertion that the land provided for in 2018 is sufficient for the region’s needs throughout the Plan period. The Report

		Norwich Airport would question the assertion that the land provided for in 2018 is sufficient for the region's needs throughout the Plan period. The Report undertaken by Bidwells and Roche has demonstrated that the existing employment floorspace is not of a high quality to support new businesses.	undertaken by Bidwells and Roche has demonstrated that the existing employment floorspace is not of a high quality to support new businesses.
Pegasus Group for Pigeon Investment Management Ltd. (Relative to Rightup Lane, Wymondham, 'Land at Hethersett, Walcot Green Lane Diss, and Dereham Road Reepham.	Comment	<p>As set out in the GNLP, there is no quantitative need for additional employment sites. Nevertheless, the GNLP allocates an additional 40ha providing a total of 360ha of employment land allocations to meet the underlying demand and provide choice to the market.</p> <p>Whilst these allocations will assist the economic growth of the area and represent positive planning, if a significant proportion of these are developed and occupied, they will be dependent upon greater numbers of incommuters from outside of the plan area.</p> <p>An appropriate monitoring framework should be put in place to ensure that a sufficient number of homes are provided to accommodate the workforce to avoid the resultant environmental harms of a greater dependency on long-distance commuting flows.</p> <p>If the monitoring framework indicates that a greater number of jobs have been accommodated than the growth in the resident workforce such that the economy of the area becomes more dependent upon unsustainable long-distance incommuting flows, this should trigger an immediate review of the GNLP alongside a policy response with residential planning applications being considered more favourably until such time as the GNLP review is adopted to address the imbalance.</p> <p>Similarly, if an insufficient amount of employment land is actually developed and occupied, this should trigger an immediate review of the GNLP to bring forward additional</p>	Monitoring framework needs to be put in place to ensure economic growth and housing delivery run in parallel, if monitoring shows they are not, early review should be carried out.

		employment land allocations alongside a policy response to consider employment planning applications more favourably in the interim.	
Breckland District Council	Comment	<p>Breckland also has planned significant growth along the A11 corridor at Attleborough, Snetterton Heath and Thetford. Breckland DC seeks confirmation that the proposed growth from GNLP will not be of detriment to the growth planned within Breckland. In particular the Council is concerned that the cumulative growth impacts on transport, power, water supply have been adequately addressed.</p> <p>For information, Breckland DC has significant growth in these areas with 4000 dwellings and employment land west of London Road at Attleborough, the significant employment growth plans for Snetterton Heath and housing and employment growth along A47 particularly at Dereham.</p> <p>Breckland DC has concerns whether the proposed improvements on A11 and A47 will be sufficient to meet the needs of the cumulative growth from the two planned areas. Equally is there sufficient Railway capacity to cope with increased growth.</p> <p>Under the Duty to Cooperate, Breckland District Council would welcome the opportunity to engage with GNLP to explore a joint approach to any constraints which may arise as a result of the cumulative growth in both planned areas.</p>	<p>Breckland Council is concerned that the cumulative growth impacts on transport, power, water supply have been adequately addressed as they also plan significant growth along A11 corridor.</p> <p>Under the Duty to Cooperate, Breckland District Council would welcome the opportunity to engage with GNLP to explore a joint approach to any constraints which may arise as a result of the cumulative growth in both planned areas.</p>

QUESTION 16

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 16 - Do you support, object or wish to comment on the approach to Review and Five-Year Land Supply?
TOTAL NUMBER OF REPRESENTATIONS:	35
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	14 Support, 3 Object, 18 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Bidwells for Hopkins Homes, Persimmon Homes and Taylor Wimpey	Support	The proposed review of the Plan 5 years after Adoption is fully consistent with paragraph 33 of the NPPF. However, it should be made clear in the Policy that the review will need to be COMPLETED within 5 years of adoption.	Review must be COMPLETED within 5 years (not carried out <i>after 5 years</i>)
Bidwells for Kier Living Eastern Ltd.	Support	As above	Review must be COMPLETED within 5 years (not carried out <i>after 5 years</i>)
Brown & Co	Support	We support the approach to review and the five-year housing land supply.	No issues requiring investigation
Bidwells for UEA Estates & Buildings	Support	The proposed review of the plan 5 years after adoption is fully consistent with paragraph 33 of the NPPF.	No issues requiring investigation
Rosconn Group	Support	RSL support the intention that the five-year housing land supply should be calculated on the basis of the whole of the Greater Norwich area.	Support for 5YLS across the whole of the three districts.

Strutt & Parker LLP	Support	<p>Policy 1: The Sustainable Growth Strategy states that the Plan will be reviewed 5 years after its adoption. At Paragraph 33, the NPPF states that Local Plans should be “reviewed to assess whether they need updating at least once every five years” and goes on to state that reviews “should be completed no later than five years after the adoption date of that plan”. As such, it is not considered that Policy 1 is consistent with national policy and this needs to be made more clear, that a review will be undertaken within five years after adoption or in the event housing delivery falls, or housing land supply falls below the annual requirement.</p> <p>In respect of Five-year land supply, as outlined at Policy 1 of the Draft Strategy, the Five-year housing land supply will be calculated across the whole of the three districts comprising Greater Norwich. This approach is supported, however, given the political nature of planning decisions it should be monitored to ensure that all three districts continue to deliver in a proportionate manner.</p>	<p>Review must be <u>COMPLETED within 5</u> years (not carried out <i>after</i> 5 years)</p> <p>Support for 5YLS across the whole of the three districts.</p>
Bidwells for Abel Homes	Support	The proposed review of the plan 5 years after adoption is fully consistent with paragraph 33 of the NPPF. In addition, we agree that, given the joint approach to the preparation of the draft GNLP, the assessment of 5 year land supply should continue to cover all 3 administrative areas.	Support for 5YLS across the whole of the three districts.
Bidwells for UEA	Support	The proposed review of the plan 5 years after adoption is fully consistent with paragraph 33 of the NPPF.	No issues requiring investigation
Bidwells for Hopkins Homes	Support	The proposed review of the Plan 5 years after Adoption is fully consistent with paragraph 33 of the NPPF. However, it should be made clear in the Policy that the review will need to be completed within 5 years of adoption.	Review must be <u>COMPLETED within 5</u> years (not carried out <i>after</i> 5 years)
Armstrong Rigg Planning for Orbit Homes	Support	Support for the approach to calculating the 5 year housing land supply across the whole of the three districts, but object to the proposal to review the Local Plan 5 years after adoption. The NPPF at paragraph 60 states that “Reviews should be completed no later than five years from the adoption date of a plan”. The wording of this policy therefore	Support for 5YLS across the whole of the three districts.

		<p>clearly needs amending to clarify that the review of the Local Plan needs to be completed within 5 years of adoption, as follows:</p> <p>This plan will be reviewed The Councils will complete and publish a review of this plan 5 years after adoption to assess whether it needs to be updated.</p> <p>Orbit Homes also considers that an additional criteria should be added to the policy to require a review of the plan if delivery falls significantly below (e.g. below c.80%) the City Deal housing commitment.</p>	<p>Review must be COMPLETED within 5 years (not carried out <i>after</i> 5 years)</p> <p>Orbit Homes also considers that an additional criteria should be added to the policy to require a review of the plan if delivery falls significantly below (e.g. below c.80%) the City Deal housing commitment.</p>
Nicole Right - La Ronde Wright	Object	<p>The words: "The plan provides enough allocations to provide a five-year housing land supply on adoption" should be deleted from the policy. By including them as policy they acquire the status given to development plan policy by s38 Planning and Compulsory Purchase Act, 2004: " If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise." This removes these words from scrutiny unless one were to accept that the plan itself might have inaccuracies that would be material considerations indicating other than compliance with it. We very much hope that the words will be correct but, if they are not, the consequences thereof must be addressed. They are, by their nature, comment on the policy but not policy. Their inclusion within the policy renders the policy unsound.</p>	<p>The words: "The plan provides enough allocations to provide a five-year housing land supply on adoption" should be deleted from the policy</p>

Hopkins Homes Ltd	Object	<p>Support for monitoring of 5yrs for whole GNLP area.</p> <p>Do not consider that the 5yrs has applied the correct buffer. Only a 5% buffer has been applied. PPG advises a minimum 10% buffer to account for fluctuations in the market.</p> <p>Concern that the 5yrs calculation has not considered the shortfall in housing delivery for DM purposes & that GNLP is applying PPG incorrectly (Reference Sedgefield approach). A recalculated 5yrs reduces the supply to 5.05 years but this does not assess deliverability & delivery rates which could further exacerbate the supply position. The plan could potentially be out of date immediately once adopted & would be ineffective.</p> <p>To provide a more positive strategy which significantly boosts housing supply, the Plan will need to adopt a higher rate of growth and allocate additional sites to significantly boost supply in order maintain a favourable five-year supply position.</p> <p>Reference made to recent appeals which question 5yrs position.</p> <p>PPG (Paragraph: 031 Reference ID: 68-031-20190722) states that where strategic policy-making authorities are unable to address past shortfalls over a 5 year period due to their scale, they may need to Consider their approach to bringing land forward this could include; re-prioritising reserve sites which are 'ready to go'.</p>	<p>Support for 5YLS across the whole of the three districts.</p> <p>5yrs does not have sufficient buffer (in accordance with PPG)</p> <p>5yrs has not considered shortfall in delivery, has not been calculated correctly & does not assess deliverability & delivery rates – Resulting in GNLP potentially being out of date upon adoption & ineffective.</p> <p>Higher rate of growth & additional sites recommended to secure 5yrs position.</p>
David Lock Associates for Orbit Homes	Object	<p>The GNLP suggests that a review will be undertaken in five years in accordance with the NPPF. We consider that unless the GNLP undertake a significant review of the spatial growth strategy and increase housing and job targets to ensure the plan is optimistic; boosts the supply of housing; and will deliver the levels of economic growth required, then a much sooner review should be undertaken.</p>	<p>Suggest a review will be required sooner than 5 years.</p> <p>Reference to potential new settlement and</p>

		The Plan makes reference to the potential for a new settlement in a future review of the Plan and given the inclusion of contingencies, there is a suggestion that there are weaknesses in the current plan that need to be addressed 'next time around'. If these weaknesses are not to be addressed in the Reg 19 plan, then in this context, an early review of the Plan would be essential.	contingencies infers weakness in plan.
RJ Baker & Sons	Comment	Future review of local plan – although we note that NPPF requires reviews at least every five years we would expect such a review to be initiated 2-3 years after adoption.	Expectation that review will be required before the 5 year window.
Bidwells for Welbeck Strategic Land III LLP	Comment	The proposed review of the plan 5 years after adoption is fully consistent with paragraph 33 of the NPPF. In addition, we agree that, given the joint approach to the preparation of the draft GNLP, the assessment of 5 year land supply should continue to cover all 3 administrative areas.	Support for 5YLS across the whole of the three districts.
Member of Public	Comment	I do not agree with this approach. As it means that villages or towns across boundaries could be vulnerable to a disproportionate share of development without the infrastructure to support it. Calculation on a District wide basis would do more to address local housing needs in a more targeted approach.	Impact on towns and villages across boundaries is not addressed in this approach.
Lanpro Services (Same Rep from Glavenhill Ltd)	Comment	Five year land supply should be calculated across the three Districts with figures provided for the newly identified Strategic Growth Area and the rural area beyond this in order to help monitor and ensure that the majority of housing delivery takes place within the Strategic Growth Area.	see summary
Persimmon Homes (Anglia)	Comment	The Strategy Document states that “the preferred option commits to a review of the plan after 5 years”. However, Paragraph 33 of the NPPF requires reviews of local plans and development strategies to be completed no later than five years from the adoption of the plan. The approach to review should therefore be amended to align with the aforementioned requirements of the NPPF.	Review must be COMPLETED within 5 years (not carried out <i>after 5 years</i>)
Home Builders Federation	Comment	We would agree that the five-year housing land supply should be calculated on the basis of the whole of the Greater Norwich area. However, we would suggest that appropriate	Support for 5YLS across the whole of the three districts.

		systems and agreements are established to support the timely provision of evidence on housing land supply when required for appeals to avoid unnecessary delays to this process.	suggest that appropriate systems and agreements are established to support the timely provision of evidence on housing land supply when required for appeals to avoid unnecessary delays to this process.
Redenhall with Harleston Town Council	Comment	It is imperative that the policy commits the councils, within the GNLP, to review the plan five years after adoption.	Commitment to review imperative
Strutt& Parker LLP for M Scott Properties Ltd. (submitted twice)	Comment	<p>The Sustainable Growth Strategy states that the Plan will be reviewed 5 years after its adoption. At Paragraph 33, the NPPF states that Local Plans should be “reviewed to assess whether they need updating at least once every five years” and goes on to state that reviews “should be completed no later than five years after the adoption date of that plan”. As such, it is not considered that Policy 1 is consistent with National Policy and this needs to be made more clear, stating that a review will be undertaken within five years after adoption or in the event housing delivery, or housing land supply falls below the annual requirement.</p> <p>In respect of Five-year land supply, as outlined at Policy 1 of the Draft Strategy, the five-year housing land supply will be calculated across the whole of the three districts comprising Greater Norwich. This approach is supported, however, given the political nature of planning decisions it should be monitored to ensure that all three districts continue to deliver in a proportionate manner.</p>	<p>Review must be <u>COMPLETED within 5</u> years (not carried out <i>after 5 years</i>)</p> <p>Support for 5YLS across the whole of the three districts. However, it should be monitored to ensure that all three districts continue to deliver in a proportionate manner</p>

<p>Pegasus Group for Pigeon Investment Management Ltd.</p> <p>(For Rightup Lane Wymondham, Hethersett, Walcott Green Lane – Diss, Dereham Road - Reepham)</p>	<p>Comment</p>	<p>Policy 1 proposes that the five-year land supply will be assessed across the plan area and that enough allocations are provided to demonstrate a five-year land supply at adoption. However, there is no evidence that this is the case as the GNLP is not supported by a housing trajectory contrary to paragraph 73 of the NPPF. Pegasus Group reserve the right to respond on this matter when the necessary evidence is made available.</p> <p>If the monitoring framework indicates that a greater number of jobs have been accommodated than the growth in the resident workforce such that the economy of the area becomes more dependent upon unsustainable long-distance incommuting flows, this should trigger an immediate review of the GNLP alongside a policy response with residential planning applications being considered more favourably until such time as the GNLP review is adopted to address the imbalance.</p>	<p>Statement that GNLP will have 5yrs upon adoption & is not sufficiently evidenced & this position is not supported</p> <p>Monitoring showing increased delivery of employment should trigger early review with residential development being considered more favourably to redress imbalance.</p>
<p>Barton Willmore</p>	<p>Comment</p>	<p>We support the option for the Plan to be reviewed after 5 years, which is consistent with the requirement of the Framework (para 33). The NPPF states that plans should be “reviewed to assess whether they need updating at least once every five years” and goes on to state that reviews “should be completed no later than five years after the adoption date of that plan”.</p> <p>As such the Authorities’ policy to review the plan 5 years after adoption is not consistent with national policy. The review must be completed prior to the plan being five years old to allow for the prompt updating of the plan if necessary. We would therefore suggest the following change is made: “This plan will be reviewed and the Authorities will complete and publish a review of this plan 5 years after adoption to assess whether it needs to be updated”</p>	<p>Review must be COMPLETED within 5 years (not carried out <i>after</i> 5 years)</p>
<p>Norwich Green Party</p>	<p>Comment</p>	<p>High housing target in JCS made it impossible to achieve 5 year land supply; it increased number of dwellings required to meet affordable housing need; and led to developers building on unallocated greenfield sites in villages.</p>	<p>See summary</p>

<p>Gladman developments</p>	<p>Comment</p>	<p>Commitment is made within the GNLP to review after 5-years. Whilst the inclusion of this review within the Plan is welcomed, Gladman considers that wording relating to the timing of this review should be revised to ensure full consistency with national planning policy</p> <p>The GNLP should be reviewed within 5 years where necessary in response to significant changes in evidence, or where housing supply falls significantly and cannot be effectively addressed by the policies of the GNLP. This will provide flexibility for the Councils should conditions relevant to policy change significantly and unpredictably between adoption of the Plan and ahead of the 5-yearly review, ensuring that the development plan is responsive and durable to change.</p> <p>In addition, and consistent with Paragraph 33 of the NPPF, the Councils should aim to complete the 5-year review of the GNLP ahead of the 5-year anniversary of adoption in order to avoid the Plan becoming out-of-date should land requirements depart significantly from evidence of needs.</p> <p>The future and early review of the GNLP should be inserted in draft Policy 1 or as a new policy</p> <p>The draft GNLP advises that the five-year housing land supply position for the plan area will be calculated as a whole, rather than on a district or sub-district basis. The move away from a subdistrict basis for this calculation is supported. The approach adopted is also responsive to the Housing Delivery Test which examines supply on this cross-boundary basis providing a single result for the authorities each year.</p>	<p>Review must be COMPLETED within 5 years (not carried out <i>after</i> 5 years)</p> <p>The GNLP should be reviewed within 5 years where necessary in response to significant changes in evidence, or where housing supply falls significantly and cannot be effectively addressed by the policies of the GNLP.</p> <p>Support for 5YLS across the whole of the three districts.</p>
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QUESTION 17

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 17 Do you support, object or wish to comment on the approach to Infrastructure?
TOTAL NUMBER OF REPRESENTATIONS:	33
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	15 Support, 3 Object, 15 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Bidwells for Hopkins Homes, Persimmon Homes and Taylor Wimpey (+ separately for Hopkins Homes)	Support	The need to support sustainable growth through the provision of infrastructure improvements, such as schools and health centres, is, in principle, supported. However, the policy should recognise that infrastructure provision must be proportionate to each development, to mitigate the impacts of the specific development, based on a local need and must not undermine delivery.	Infrastructure provision to be proportionate and relevant to each development & not undermine delivery
Bidwells for Kier Living Eastern Ltd.	Support	The need to support sustainable growth through the provision of infrastructure improvements, such as schools and health centres, is, in principle, supported. However, the policy should recognise that infrastructure provision must be proportionate to each development, to mitigate the impacts of the specific development, based on a local need and must not undermine delivery.	Infrastructure provision to be proportionate and relevant to each development & not undermine delivery
Brown & Co	Support	We support the approach to infrastructure. The Greater Norwich Local Plan Infrastructure Needs Report indicates that some local infrastructure is already over capacity, notably a number of substations. Additional	Infrastructure Needs Report indicates that some local infrastructure is already over capacity,

		information should be provided as to how carried forward and new allocations in these areas would overcome to ensure timely delivery.	notably a number of substations. How will this be overcome to ensure delivery?
Bidwells for UEA Estates & Buildings (x5)	Support	The need to support sustainable growth through the provision of infrastructure improvements is, in principle, supported. However, the policy should recognise that infrastructure provision must be proportionate to each development.	Infrastructure provision to be proportionate and relevant to each development & not undermine delivery
Bidwells for M Scott Properties Ltd.	Support	<p>The need to support sustainable growth through the provision of infrastructure improvements, such as schools and health centres, is, in principle, supported. However, the policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery.</p> <p>When considering infrastructure, consideration should be given to whether it is viable for some of the larger strategic sites, which have high infrastructure costs associated with their delivery i.e. the requirement to provide schools and health centres on land which otherwise would be land developable for alternative uses, to pay the Community Infrastructure Levy, in addition to the policy requirements of the Local Plan..</p>	Infrastructure provision to be proportionate and relevant to each development & not undermine delivery
Mrs Nicole Wright – La Ronde Wright	Support	<p>The social objectives of the plan are lacking. There is a need for this policy to address current and future health, social and cultural needs.</p> <p>There is a strong focus on housing growth at the neglect of social and community needs and priorities. (It is not consistent with Paragraph 15 of the NPPF).</p>	Policy needs to address current and future health, social and cultural needs.
Strutt & Parker LLP for M Scott Properties Ltd. (also registered as comment 22789)	Support	We support the approach to infrastructure that has been set out within Policy 1 – The Sustainable Growth Strategy in that the sustainable growth strategy will be supported by improvements to the transport system, green infrastructure and services. Adequate infrastructure provision is key to supporting the development of the Plan area and enabling development to come forward.	The statement provided within Policy 1 is vague and needs a greater explanation as to how the Greater Norwich Local Plan will ensure

		The statement provided within Policy 1 is vague and needs a greater explanation as to how the Greater Norwich Local Plan will ensure sustainable growth is supported by improvements to infrastructure.	sustainable growth is supported by improvements to infrastructure.
Crown Point Estate	Support	<p>We welcome the support for improvements to the transport system, but these need to be clarified. We are promoting the Loddon P&R site as a means by which the GNLP can improve P&R provision on the last remaining main route into the city.</p> <p>We welcome the support for improvements to green infrastructure. We consider that the additional land at Whitlingham Country Park should be safeguarded for such improvements, to promote confidence that the proposed allocations for developments in the vicinity will be able to rely on support for investment therein.</p>	<p>Clarification required regarding improvements to the transport system.</p> <p>Whitlingham Country Park should be safeguarded for Green Infrastructure improvements.</p>
Bidwells for Abel Homes (x2)	Support	The need to support sustainable growth through the provision of infrastructure improvements is, such as schools and health centres, in principle, supported. However, the policy should recognise that infrastructure provision must be proportionate to each development, based on local needs, alongside not undermining the viability of housing delivery.	Infrastructure provision to be proportionate and relevant to each development & not undermine delivery
Member of public	Object	No new roads should be built. All the money should be put into proving good electric bus services and trains where possible and building traffic free routes for cycling/walking. Air pollution is killing 40,000/yr in UK. Obesity is killing people (Storing up problems , Royal College of Physicians 2004)	<p>No new roads should be built – significant negative health impacts.</p> <p>Focus instead on clean sustainable transport.</p>
Norwich Green Party	Object	<p>We object to the GNLP reliance on individual private car use for accessing essential infrastructure, notably:</p> <ul style="list-style-type: none"> Health Care Requirements (ref Appendix 1): Parking is referred to in relation to 'Additional need resulting from growth' for the categories of 'Hospital' (NNUH) and 'Mental Health' (Julian Hospital). The expansion of car parking at NNUH is a major concern which needs addressing. Firstly, additional car parking facilitates the 	Object to development reliance on individual private car – negative health & environmental impacts

		<p>growth in car travel to the hospital and leads to an increase in carbon emissions and in air pollution.</p> <ul style="list-style-type: none"> • there is a social equity problem because public transport provision serving the NNUH is unaffordable and second rate for many low income households and those without a car. • Money will need to be found for improving public transport infrastructure for serving the NNUH (such as re-organising the rather chaotic dropping off/picking up public transport arrangements outside the main entrance) in view of the smaller than anticipated Transforming Cities grant. <p>We are concerned about the out-of-town locations of the planned recycling centres which will increase reliance on car-borne access. The increase in carbon emissions from additional car mileage could potentially negate any energy savings benefits from recycling.</p> <p>High quality public transport infrastructure is referred to in Section 5 Policy 1 (para 168) and the Key Diagram shows eight Strategic Bus Corridors. We wish to reiterate our point that the GNDP authorities' Transforming Cities application was unsuccessful and Norwich, Portsmouth and Stoke will have to share a £117m pot.</p> <p>As a consequence, the draft plan is not deliverable due to uncertainty around the ability to develop a city-wide public transport system for serving growth (including the level of growth to 2026 envisaged by the JCS). There are no other large sources of funding on the horizon which can make up for the deficiency. A lack of funding means that the draft GNLP fails the NPPF 'Effectiveness' test.</p>	<p>Social equity problem – public transport is not affordable</p> <p>Out of town recycling centres – additional fuel consumption impacts benefits of recycling</p> <p>Transforming cities bid less than hoped - the draft plan is not deliverable due to uncertainty around the ability to develop a city-wide public transport system for serving growth</p> <p>A lack of funding means that the draft GNLP fails the NPPF 'Effectiveness' test.</p>
Cheffins for RJ Baker & Sons	Comment	<p>The approach set out in draft Policy 1 is somewhat vague in simply stating that the growth strategy will be supported by infrastructure improvements. We would suggest that more specific commitments are required in this policy or cross reference to other policy proposals.</p>	<p>Approach to infrastructure improvements is vague. Requires clarification, specific commitments & cross reference to other policies.</p>

<p>Bidwells for Welbeck Strategic Land III LLP</p>	<p>Comment</p>	<p>The need to support sustainable growth through the provision of infrastructure improvements, such as schools and health centres, is, in principle, supported. However, the policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery.</p> <p>Consideration should be given to whether it is unviable for some of the larger strategic sites, which have high infrastructure costs associated with their delivery i.e. schools and health centres, to pay the Community Infrastructure Levy, in addition to the policy requirements of the Local Plan or whether site specific Section 106 obligations are appropriate.</p>	<p>Infrastructure provision to be proportionate and relevant to each development & not undermine delivery. Individual sites require assessment as part of viability.</p>
<p>Lanpro Services (Same rep for Glavenhill Ltd.)</p>	<p>Comment</p>	<p>The policy should say how the suggested improvements will be achieved e.g. through CIL, site specific policies, specific infrastructure policy.</p>	<p>Approach to infrastructure improvements requires clarification.</p>
<p>Hingham Parish Council (x2)</p>	<p>Comment</p>	<p>Whilst Hingham Town Council support the policy “the sustainable growth strategy will be supported by improvements to the transport system, green infrastructure and services” – there is absolutely no evidence to show how this will be achieved in Hingham. Hingham is in need of improvements to its footways, roads, school, green infrastructure and public transport – HOW in this going to be improved in Hingham to support the growth of the town?</p>	<p>No evidence as to how infrastructure improvements will be achieved.</p>
<p>Natural England</p>	<p>Comment</p>	<p>The current wording of the policy needs to be strengthened with regard to the environment and the delivery of GI. Currently it is rather vague and weak with regard to the essential role that quality GI must play if sustainable development is to be delivered under the Plan and meet the needs and aims as set out in the accompanying text under (144). The policy needs to cross reference Policy 3 in order to provide a strong and clear steer of what will be required to deliver the growth strategy whilst protecting and enhancing the area’s natural environmental assets, and to make the Plan sound. (SUGGESTED ADDITIONAL POLICY WORDING PROVIDED)</p> <p>Green Infrastructure is completely absent from Appendix 1.</p>	<p>The current wording of the policy needs to be strengthened with regard to the environment and the delivery of GI</p> <p>Policy should cross reference policy 3</p>

		We strongly recommend that references to GI throughout the Plan should be made instead to the Greater Norwich Infrastructure Plan (dated July 2019).	Green Infrastructure is entirely absent from appendix 1
Pegasus Group for Pigeon Investment Management Ltd.	Comment	Concerns are raised regarding an imbalance in location of employment & residential land & delivery which may impact travel to work requirements.	Imbalance in location of employment & residential land & delivery which may impact travel to work requirements.
Norwich Green Party	Comment	<p>Energy: a number of City Council car parks have electrical load restrictions which limit the provision of additional chargers for electric vehicles especially rapid chargers. UK Power Networks might require grid improvements for the city centre area to enable new chargers to be connected to the network.</p> <p>Green Infrastructure: Policy 1 Infrastructure refers to green infrastructure. We would like to see a step change in the provision of green infrastructure. The latter should be in addition to and not a replacement for the ongoing loss of informal green spaces such as sports grounds and playing fields to housing and other development. Green infrastructure relating to active travel has in several instances involved the removal of greenery to the detriment of urban heating and biodiversity; for example grass verges have been removed in order to widen shared pedestrian/cycle paths. All green infrastructure should involve the enhancement or new addition of green soft landscaping</p>	<p>UK Power Networks may require improvement to facilitate needs of electric car charging</p> <p>Green infrastructure provision should be 'in addition to' not just 'replacement of' loss of informal green spaces.</p> <p>Green infrastructure for travel should enhance or provide new green soft landscaping not facilitate the removal for wider path ways.</p>
Sport England	Comment	Infrastructure requirements should be widened to include social infrastructure such as schools and outdoor/indoor spaces for sport and physical activity	See summary

Pegasus Group for Halsbury Homes Ltd.	Comment	<p>Our client agrees with the broad sustainable growth strategy to support improvements to the transport system, green infrastructure and services.</p> <p>The GNLP should promote sustainable growth by allocating housing sites in sustainable locations in established settlements which possess high-quality public transport links and good range of services.</p>	The GNLP should promote sustainable growth by allocating housing sites in sustainable locations in established settlements which possess high-quality public transport links and good range of services
Salhouse Parish Council	Comment	No definition of a 'Green infrastructure priority corridor' or how this would work??	See summary

QUESTION 18

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	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?
TOTAL NUMBER OF REPRESENTATIONS:	60 -4 duplicates
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	16 Support, 16 Object, 28 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
19825	Comment	There are only two mentions of air quality in the policy, one of which says that air quality should be protected. If that is to be achieved, then we must ensure that future development does not impact it negatively. One way to do this would be to adopt the principle, explicitly set out in the GNL, that all new developments need to demonstrate that they will not reduce air quality in the long term. Air quality in Norwich is bad enough as it is, and the consequences to our health are becoming clearer on a daily basis.	All new development to not reduce air quality
19852	Comment	In relation to multiple GNL Sustainable Communities policies there is no mention of the food system. Increasing the opportunity for urban agriculture (allotment space, designated community gardens, space for small food enterprises) could help strengthen food security, reduce food poverty, increase health (mental and physical) and create stronger community bonds through inclusive activities and educational workshops. The benefits of including food on	Increase opportunities for urban agriculture

		planning agendas has been outlined in many papers and an explicit food strategy for Norwich that allows food (production, distribution, consumption, and waste) to be included alongside other development staples could reap multiple rewards for the City.	
19915	Comment	There is talk of "Greater Norwich of having strong landscape protection policies". Most developments are very intrusive into the local landscape and not enough is done to both protect trees and require substantial new planting. AWA talks of it's major strategy being to conserve water. This is all well and good as long as new housing drainage is laid to sufficient fall to ensure self cleansing. The GP's, hospital (N&N) and dentists are not providing an adequate service at the moment through excessive demand, additional housing will merely exacerbate this. This is a failure of the planning system.	Protect trees and require new planting Design of drainage Excessive demand on medical services from housing
20101	Comment	It is unclear what is meant by 'delivery plans'; and some applicants will not control the delivery as they are not housebuilders.	Housing delivery is not necessarily under the control of planning applicants
20471	Comment	Some of the proposals set out, such as the need to retain landscape gaps between communities and water neutrality are commendable. Housing density should be higher, particularly in Norwich. The design and layout of Victorian terraced housing might well be a model for our future low carbon world. This policy reads as a gloss to cover the shortcomings of the overall vision, it should be the main item on the menu with far greater emphasis on the location of new housing. Any Sustainability Statement should be carried out before allowing any site to be included in the Local Plan.	Support landscape gaps Support water neutrality Housing density should be higher, particularly in Norwich e.g. terraced housing Need greater emphasis on the

			location of new housing
20747 Hempnall Parish Council Also see 21475 Object	Comment	<p>The words “as appropriate” in the policy means the requirements are far too open to interpretation and will mean opportunities to mitigate and adapt to climate change will be missed.</p> <p>This is particularly relevant when considering how new housing development in the village clusters will fulfil the requirement to ensure safe, convenient and sustainable access to on-site and local services and facilities . The rationale for village clusters seems mainly based on availability and accessibility of a primary school. Safe, convenient and sustainable access to the other features on this list are equally important. Many sites in village clusters do not have adequate access to facilities and so should not be included.</p> <p>There is a conflict between point 6 on encouraging public transport and managing travel demand, and new housing within village clusters. Public transport may not be available e.g. for Hempnall no public transport links to nearby Key Service Centres and links to Norwich are inadequate. For new housing in village clusters most working residents will not have good access to services and local jobs. There will be an increase in the number of journeys by private vehicles, which will not be electric-powered certainly for the majority of the plan period. Additional housing is unlikely to keep a village shop open, but will increase the number of journeys made for delivery and service vehicles, making this housing even more unsustainable.</p> <p>To minimise pollution under point 8, no additional new housing should be allocated in village clusters as it will cause additional vehicle journeys and increase.</p>	<p>Use of “as appropriate” is too vague</p> <p>Village clusters and site selection should be based on availability of range of services not just primary school.</p> <p>Additional housing in villages will increase journeys by motor vehicles and cause pollution.</p> <p>Additional housing is unlikely to keep shops open.</p> <p>Should be no new housing in village clusters</p>
20848	Comment	Whilst the requirement to ensure the efficient use of land by, amongst other things, providing an indicative minimum density of 25 dwellings per hectare, is	Indicative minimum housing

Bidwells / Wellbeck Strategic Land		supported, the policy, or supporting text, should make it clear that, as well as giving consideration to on site characteristics, consideration will be given to a range of other site / scheme specific issues, such as housing mix, design considerations and the densities of the surrounding area.	density supported but should allow for onsite considerations
20970	Comment	<p>Sustainability statements Clause 175 should be required for all forms of development including alterations and conversions, not "Major" or "Minor". A simple 1 page of thought on the subject is not disproportionate to climate change needs.</p> <p>Policy 2 Clause 3 why the weasel word "contribute" rather than "provide" and enhance bio-diversity.</p> <p>Policy 2 Clause 10. Absolutely support the requirement for enhanced energy uplift above Building Control old standard</p>	Consider detailed wording re scale of development and clause 3
21097	Comment	In principle this section makes sense. However, there is a heavy reliance on the requirements for statements by developers at the time of submitting a planning application. There are no statements regarding a macro approach to community planning or strong community involvement in planning prior to the submission of plans. It would make sense to engage communities at a much earlier stage in the approach suggested. We also wish to record our support for the comments made on this question by CPRE	Consider wording re community engagement
21135	Comment	The current predicament for Horsford is that due to increased development the B1149 becomes heavily congested with vehicles at peak travel times. Further development in the village would exacerbate vehicle movement and increase environmental pollution which is in conflict with GNL Policy 2 regarding meeting greenhouse gas emission targets.	Traffic congestion, pollution, social infrastructure capacity restricts scope for development

		The Primary School cannot take further increased numbers of children and the doctors practice is also at capacity.	
21298 Lanpro	Comment	Lanpro generally supports this policy but without knowing where the small rural village cluster allocations will be made in South Norfolk and whether they are sustainable, we are concerned that they may not be able to meet some of these requirements.	
21346 Reedham Parish Council	Comment	How does housing development in "Village Cluster" ensure 'safe, convenient and sustainable access to local services and facilities' which are lacking in most villages? There is no joined up thinking between the "Village Cluster" concept and the aspiration to 'manage travel demands and promote public transport'. Most villages have limited or no public transport. "Village Clusters" are not where the jobs and services are which will therefore increase the car journeys required to access these. This does not correlate to 'minimising pollution'.	Conflict between seeking sustainable locations for development limiting traffic and pollution with allowing development in villages
21398 Lanpro / Glavenhill Ltd	Comment	Glavenhill Ltd generally supports this policy but without knowing where the small rural village cluster allocations will be made in South Norfolk and whether they are sustainable, we are concerned that they may not be able to meet some of these requirements.	
21432	Comment	There are some excellent recommendations in the TCPA's State of the Union - reuniting health with planning in promoting healthy communities that will amplify the Policy 2 commitments. https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=cb4a5270-475e-42d3-bc72-d912563d4084 . Particularly Page 35 diagram - an integrated approach to planning for health and wellbeing.	Health and wellbeing issues and Active Design principles need to be included

		A commitment to work jointly with healthcare partners to ensure the commitments within Policy 2 contribute to addressing local health needs in a targeted, insight led approach. The use of Active Design principles to guide the implementation of Policy 2 would be appropriate.	
21504 Bergh Apton Parish Council	Comment	<p>Bergh Apton is a rural village, at its nearest point, 7 miles from Norwich city centre. Bergh Apton has been grouped with Alington and Yelverton as a village cluster for development. There is no school in the village, the nearest being at Alington. There is no footpath from Bergh Apton to Alington.</p> <p>Of the 9 sites put forward in Bergh Apton, only the former blockworks on Church Road would have reasonable access to the school in Alington, if a permissive path was provided.</p> <p>Also, the road could be widened if it was felt that part of it was too narrow.</p>	Bergh Apton has limited facilities and poor access to school
21524 Hingham Parish Council Also see 23029 Object	Comment	See 23029 Object	
21539	Comment	Linking references should be made to the newly commissioned review of the GNGB Sport and Facilities strategies which were last published in 2014. The work is being implemented through the Greater Norwich Sports Strategy Implementation Group and will develop a new collaborative and insight led approach to planning and delivering strategic outcomes for sport and physical activity using Sport England's Strategic Outcome Planning Guidance.	Reference to Sport and Facilities Strategy and work of SSIG in implementation

<p>21762 RSPB</p>	<p>Comment</p>	<p>Careful consideration of water impacts (quality and quantity) will be required to demonstrate that there definitely will not be any adverse effects on integrity of Natura 2000 and Ramsar sites.</p> <p>A more rigorous approach to water management and adopting more demanding standards is supported. What additional benefits could be gained from improvements to existing residential and commercial buildings?</p> <p>How successful has Anglian Water’s “love every drop” campaign been and do they propose continuance and escalation of this approach?</p> <p>An updated water cycle study will be required to inform decisions about what is appropriate, including the HRA, and ensuring that adverse effects on integrity will be avoided.</p> <p>The HRA suggests the plan there will not be any adverse effects on integrity of Natura 2000 and Ramsar sites, but this is due to incomplete work such as the Norfolk RAMS and GI Strategy. Until finalised, they cannot be relied upon.</p>	<p>Potential impacts on water quality and resource and nature sites</p> <p>Increased standards for water management supported.</p> <p>Updated water cycle study required.</p> <p>Work relating to HRA incomplete</p>
<p>21907 Home Builders Federation</p>	<p>Comment</p>	<p>It is recognised that there is a need to move towards stronger measures to improve the environmental performance of new residential development, in terms of reducing carbon emissions, gains in biodiversity, increasing green infrastructure and improving the environment around new developments. However, a national and standardised approach to environmental improvements, balancing improvements with continued deliver of housing and infrastructure, is preferable to local authorities setting their own standards. We consider this is necessary to allow research and development and supply chains to focus upon agreed national targets, and for training providers to plan their programmes to equip the labour force to meet these new requirements. It is fundamentally inefficient to create a plurality of standards.</p>	<p>National legislation and environmental / biodiversity etc standards should be relied on, not local ones, in accordance with the NPPF.</p>

		<p>The industry will need to take into account the Governments measures on the Future Homes Standard and Bio-Diversity Gain, both of which will be mandatory for new residential developments in future. The industry will be commissioning work to consider what the industry can do, and what new standards can feasibly be adopted and implemented by the industry.</p> <p>Therefore, the councils should work within the current policy and legislative framework and not seek to deliver a different range of standards that will work against the collective drive on this matter. It will be necessary to balance the cost of delivering the energy efficiency improvements alongside other planning obligations and development aspirations that are sought through the GNLP, such as meeting housing needs in full and improving the affordability of homes in this area. They should consider the consequences of introducing planning policy burdens on new development recognising that the costs of these will ultimately be passed onto the consumer or leave some sites undeliverable.</p> <p>Prior to the future standards the GNLP must take account of current guidance on technical standards e.g. NPPF para 50: "Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards"; and the Planning Practice Guidance (PPG) that policies requiring higher energy performance standards than building regulations should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes. The aspirations of this plan on improving the energy efficiency of new homes must be made within the context of this guidance if the plan is to be consistent with national policy and found sound.</p> <p>It will also be important for the Council to ensure that the impact of this policy is fully tested within its viability study.</p>	<p>Impact on viability of local standards should be tested.</p> <p>New technologies infrastructure costs should be included in viability assessment (currently they are not).</p>
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		<p>The second bullet point allows for new and changing technologies such as fibre optic networks and electric vehicles. Whilst the HBF is supportive of such infrastructure it is important that the costs of delivering this infrastructure is considered within the Councils viability assessment. These are not included as policy costs within the interim viability study and if specific policies are to be produced requiring such infrastructure they should be included as a specific cost; e.g. the installation of electric vehicle charging points (EVCP) is estimated to add on an additional cost of approximately £976 per unit; they will also add to the electricity demand which may add to the costs for installing the power supply.</p>	
21985	Comment	<p>The use of the words “as appropriate”, in the policy’s introduction, mean the requirements would be far too open to interpretation as to what is “appropriate”.</p> <p>This concern is particularly relevant when considering how new housing development in the village clusters will fulfil the first requirement to ensure safe, convenient and sustainable access to on-site and local services and facilities including schools, health care, shops, leisure/community/faith facilities and libraries when these are simply not available in most villages.</p>	<p>Consider wording - “appropriate” is too open to interpretation.</p>
22065 Norfolk Wildlife Trust	Comment	<p>Whilst we support the drive to increase energy efficiency and on site renewable energy provision in order to help mitigation the impacts of climate change, in line with best practice advice, the recent adoption of an even more ambitious zero carbon target for major housing development by Reading Borough Council (RBC Local Plan policy H5) shows that even greater gains can be delivered through the GNLP. We strongly recommend, in order to reduce future impacts of climate change on wildlife as far as possible, that the GNLP adopts a zero carbon target for all new housing.</p> <p>We support the measures in point 5 to protect and enhance the landscape, as this will provide vital space for wildlife to move through the landscape in</p>	<p>Have higher environmental standards and a zero Carbon target (as in Reading LP)</p> <p>Support landscape enhancement.</p>

		<p>adaptation to climate change. Given the vital role of nature-based solutions to climate change mitigation and adaptation, we see the need to safeguard and restore our natural environment as a vital part of progress to a carbon neutral future. In addition, in order to maintain this connectivity through the natural landscape, which overlaps with the incoming need in the Environment Bill to develop Nature Recovery Networks, we also strongly recommend that policy measures are added to the GNLP to ensure that new development includes green natural features wherever possible to ensure living space and movement corridors for wildlife in the built environment. We recommend that a policy requiring minimum standards for provision of green infrastructure such as green roofs, walls and sustainable drainage are required for new development. In addition to benefits for wildlife, this can contribute to improved climate resilience and adaptation through improving energy efficiency in buildings, reducing the urban heat island effect, and reducing rain run-off rates, as well as improving quality of life through providing more wildlife rich public space. Such policies have been successfully adopted in many cities across the world, including in the UK Southampton (Southampton City Centre Action Plan policy AP12, Green Space Factor) and the Urban Greening Factor in policy G5 of the draft London Plan.</p>	<p>Include increased measures for wildlife / green infrastructure and climate resilience (as in Southampton CCAP and draft London Plan)</p>
<p>22332 / 22369 Pegasus Group Pigeon Investment Management Ltd</p>	<p>Comment</p>	<p>We broadly support the overall aims and objectives of the GNLP to facilitate the growth and delivery of sustainable communities, subject to a number of detailed comments.</p> <p>Criteria 3 - This is supported as it provides for the environmental objective of sustainable development. Pigeon's site proposals at Hethersett includes new green infrastructure linkages thereby supporting the environmental objectives of Criteria 3.</p> <p>Criteria 4 - The density of residential development at any site is dependent on</p>	<p>Green infrastructure in site at Hethersett supports criteria 3.</p> <p>Criteria 4 -Density of a site is dependent on on-site requirements. It should be</p>

		<p>other community infrastructure or site-specific requirements that may arise as a result of emerging GNLP planning policy. It may transpire that a site promoted to the plan can provide educational or health facilities in association with residential development. The need for highway infrastructure and sustainable drainage features to be provided at a site also should be taken into consideration. To that end the policy should be amended to state that; “..the indicative minimum net density of the residential element of a site allocation should be 25 dwellings per hectare “.</p> <p>The Policy identifies that these minimum density standards are indicative. This is supported as it allows for flexibility to ensure that each parcel of land is used effectively, taking account of the type of development proposed, the site context and appropriate design characteristics.</p> <p>Criteria 5 - It should be noted that Green Belt and the strategic gaps are not landscape designations and so the criteria does not actually fulfil the objective of the Policy. The criteria should therefore be amended to provide clarity as to whether the objective is to respect landscape characters or to provide a place-shaping tool as would be provided through the designation of Green Belt or whether both of these separate policy objectives are sought.</p> <p>Paragraphs 331 and 337 of the GNLP suggests that the role of the strategic gaps is to prevent coalescence which is a place-shaping rather than landscaping policy. Therefore, it appears that the strategic gaps are being used as a replacement for Green Belt given that the GNLP acknowledges in Table 8 that there are no exceptional circumstances to justify the designation of Green Belt. The role of the strategic gaps must therefore be less restrictive than that which would be provided by a Green Belt. This is especially so where, as is the case with Land off Station Road, the designated area does not make any contribution to the separation of Hethersett and Norwich.</p>	<p>changed to refer to indicative minimum net density of 25pha; - “indicative” is supported.</p> <p>Criteria 5 – re greenbelt / strategic gaps / landscapes is unclear and does not fulfil policy objective; needs to be clarified; -Ref to site at Hethersett.</p>
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		<p>Even if it was appropriate to designate a proxy-Green Belt through the use of strategic gaps, paragraph 145 of the NPPF identifies that some development within a Green Belt can be appropriate and the same approach should be adopted in relation to strategic gaps. For example, where outdoor sports and outdoor recreation developments are proposed such as at Land off Burnthouse Lane, these would not be inappropriate in the Green Belt and so they would clearly not be inappropriate in a strategic gap. However, the objective to respect landscape character is supported and this can be provided through landscape-led development at both Land off Station Road and Land off Burnthouse Lane, both of which contain generous areas of strategic landscaping and robust tree/shrub belts to ensure that these can be appropriately integrated into the surrounding landscape.</p> <p>In respect of Land off Burnthouse Lane, it should also be noted that Colney Lane, which forms the eastern boundary of this parcel, forms a clearly defined boundary with an existing planting belt (approximately 20-25m wide) running along the eastern edge of Colney Lane. The existing planting belt and Colney Lane itself provide a more appropriate boundary to the strategic gap, with the agricultural fields to the east of Colney Lane providing separation between Hethersett and the A47 to the east (and Cringleford beyond).</p> <p>Criteria 10 - The Planning Practice Guidance states that; The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building's sustainability to do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners and will need to be based on robust and credible evidence and pay careful attention to viability PPG Climate Change Paragraph: 009 Reference ID: 6-009-20150327 Last revised 27th</p>	<p>Criteria 10 – standards on a buildings energy efficiency etc should reflect NPPF</p>
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	<p>March 2015</p> <p>PPG Paragraph: 012 Reference ID: 6-012-20190315, last revised 15th March 2019, states that Local Plans can set energy efficiency standards that exceed the energy efficiency requirements of the Building Regs, it also states that such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the code for Sustainable Homes which is identified as approximately 20% above current Building Regs across the build mix. The PPG also requires such policy requirements to be viable.</p> <p>The Code for Sustainable Homes was withdrawn in 2015 and replaced by technical housing standards. The GNLP Reg 18 has chosen to continue to pursue the 20% above Building Regs approach at criteria 10 of Policy 2.</p> <p>The Alternative approaches section states that this target is a challenging but achievable requirement and that to go beyond 20% would be unviable.</p> <p>What is not clear however is the Councils evidence to require energy savings of at least 20% above Building Regs when the PPG states ~approximately 20% across the build mix”.</p> <p>It is not clear either whether this policy requirement has been appraised across a range of site typologies in the viability appraisal and whether it has been tested in conjunction with the other policy requirements of the plan, including those of emerging Policy H5 which seeks:</p> <ul style="list-style-type: none"> i. 33% affordable housing, (except in Norwich City Centre); ii. all new housing development to meet the Governments Nationally Described 	<p>and PPG and be viable having regard to other costs on development.</p> <p>-What is the evidence for higher standards and why “at least 20%”?</p> <p>- Not clear what is meant by a masterplanning process; and it is suggested that this goes beyond what is required in the adopted SCI’s and the results of a process may not be satisfactory for a planning application.</p>
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		<p>Space Standards; and</p> <p>iii. 20% of major housing developments to provide at least 20% of homes to the Building Regulation M4(2)(1) standard or any successor.</p> <p>Whilst the objectives behind these are supported, taken together these emerging policy requirements of the plan could prejudice the delivery of some sites within the emerging plan.</p> <p>Master planning</p> <p>Community engagement prior to submitting an application is supported. However, Policy 2 identifies master planning using a recognised community engagement process for schemes of more than 200 dwellings will be encouraged. It is not clear what is meant by such a master planning process and clarity would be welcomed.</p> <p>It is considered likely that such a master planning process would exceed the requirements of each of the joint authorities existing adopted Statements of Community Involvement and also goes beyond the requirements of paragraphs 39 to 41 of the NPPF and the PPG (20-010). Furthermore, there is no guarantee that the masterplan outcomes of such a community engagement process will be considered appropriate or acceptable by the local authority as there is no mechanism for validating the outcomes of the process pre-submission. This could result in difficulties for all parties at the application stage should masterplan amendments be required as a result of statutory and internal local authority consultations post submission.</p>	
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22471 Breckland District Council (officer level response)	Comment	The Plan needs a clear monitoring framework setting out how climate change policies this will be monitored with differing targets on carbon neutrality across the county.	Clear monitoring framework needed
22648 Sport England	Comment	<p>Sport England supports this policy, which seeks to increase opportunities for healthy and active lifestyles.</p> <p>Sport England, in conjunction with Public Health England, has produced Active Design (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</p> <p>Sport England would support referencing Active Design in the supporting text for this policy, as the guidance will assist in the development of sustainable communities to make increased opportunities for sport and physical activity.</p>	<p>Support for policy</p> <p>Suggest reference made to Active Design document</p>
22699 Strutt & Parker LLP / Scott Properties	Comment	The preferred approach to sustainable communities is the requirement for sustainability assessments to accompany planning applications for major developments. This approach is supported and is considered to be in line with the National Planning Policy Framework.	Support for approach to sustainable communities, it is in accordance with NPPF
22971	Comment	Our client recognises the importance of delivering the infrastructure for the charging of electric vehicles but is concerned about the impact of the	Infrastructure for charging electric

<p>Pegasus Planning Group / Barratt David Wilson Homes</p>		<p>widespread use of residential charging points, which would require additional infrastructure to accommodate the power needed. Moreover, costs of installing the cables and associated hardware will vary considerably based on site conditions and the connections to and capacity of the local grid. It is essential that all associated costs related to electric charging infrastructure are taken into account to ensure that their cumulative impact do not render the sites undeliverable without reducing the percentage of affordable housing that they deliver. Our client believes that the best approach is for developers to ensure that the necessary ducting and cabling is installed to allow residents to fit their own electric charging points as and when required.</p>	<p>vehicles will have a cost on development that could affect viability. Approach should be for developers to provide ducts and cabling and resident fits charging point when required.</p>
<p>23108 Salhouse Parish Council</p>	<p>Comment</p>	<p>CPRE Norfolk questions the use of the words “as appropriate” in the policy’s introduction, as this is far too open to interpretation and therefore opportunities to ensure that ~mitigating and adapting to climate change, [and] assisting in meeting national greenhouse gas emissions targets will be missed.</p> <p>This is particularly relevant when considering how new housing development in the village clusters will fulfil the requirement to ensure safe, convenient and sustainable access to on-site and local services and facilities . The rationale for village clusters seems mainly based on availability and accessibility of a primary school. Safe, convenient and sustainable access to the other features on this list are equally important. Many sites in village clusters do not have adequate access to facilities and so should not be included</p> <p>There is a conflict between the aspirations in point 6 and the need to manage travel demand and promote public transport and active travel and the additional new housing in village clusters. Most new housing residents will be unable to use active travel or public transport, due to the likely distances from workplaces and the lack of suitable public transport and will not have ~good</p>	<p>Use of “as appropriate” is too open to interpretation.</p> <p>Rationale for village clusters is overly reliant on access / availability of a school; other facilities are equally important.</p> <p>Sites in villages without access to facilities should not be included.</p>

		<p>access to services and local job opportunities”. There will be an increase in the number of journeys by private vehicles, which will not be electric-powered certainly for the majority of the plan period. Additional housing is unlikely to keep a village shop open but will increase the number of journeys made for delivery and service vehicles, making this housing even more unsustainable.</p> <p>To minimise pollution under point 8, no additional new housing should be allocated in village clusters as it will cause additional vehicle journeys and increase.</p>	<p>Putting development in villages will increase number of private vehicles and conflict with aim of managing travel demand; most new housing in villages will not have access to public transport; it will not help to keep shops open and will increase delivery / service vehicles.</p> <p>There should be no new housing in village clusters</p>
<p>21797 Barton Willmore on behalf of Berliet Ltd</p>	<p>Object</p>	<p>Policy 2 (iii) “ Delivery Plans “ whilst we support the need for the delivery of housing in order to meet targets (both in 5YHLS terms and across the longer Plan period), and we recognise the role of Delivery Plans in helping to ensure that delivery occurs, we believe that such Delivery Plans need to take account of the following allowances in order to work effectively:</p> <p>a.Changes in market demand;</p>	<p>Delivery Plans are valuable but need to allow for changes in market demand, viability challenges, delays in the planning system or with</p>

		<p>b.Viability challenges; and</p> <p>c.Delays arising within the planning system or through the public engagement process;</p>	public engagement.
20348 Brockdish & Thorpe Abbotts Parish Council	Object	Our concern is that the aspirations in this policy, whilst laudable, are little more than aspirations. The actions suggested are not options - they are essential. The Village Cluster policy does not meet your aspirations. Our concern is reinforced by the SNDC view that Building Regulations can only be tightened to the extent that builders will accept that.	The aspirations in policy are not options, they are essential.
20672 CPRE Norfolk	Object	<p>The consultation should welcome thorough responses, and not imply that only shorter summaries will be reported.</p> <p>The use of the words “as appropriate” in the policy is questioned as it will be far too open to interpretation and therefore opportunities to ensure that “mitigating and adapting to climate change, [and] assisting in meeting national greenhouse gas emissions targets” will be missed.</p> <p>This is particularly relevant when considering how new housing development in the village clusters will fulfil the requirement to ensure safe, convenient and sustainable access to on-site and local services and facilities. The rationale for village clusters seems mainly based on availability and accessibility of a primary school. Safe, convenient and sustainable access to the other features on this list are equally important. Many sites in village clusters do not have adequate access to facilities and so should not be included.</p> <p>There is a conflict between the aspirations in point 6 and the need to manage travel demand and promote public transport and active travel and the additional new housing in village clusters. Most new housing residents will be unable to use active travel or public transport, due to the likely distances from</p>	<p>Use of “as appropriate” is too open to interpretation.</p> <p>Rationale for village clusters is overly reliant on access / availability of a school; other facilities are equally important.</p> <p>Sites in villages without access to facilities should not be included.</p> <p>Putting development in villages will</p>

		<p>workplaces and the lack of suitable public transport and will not have “good access to services and local job opportunities”. There will be an increase in the number of journeys by private vehicles, which will not be electric-powered certainly for the majority of the plan period. Additional housing is unlikely to keep a village shop open but will increase the number of journeys made for delivery and service vehicles, making this housing even more unsustainable.</p> <p>To minimise pollution under point 8, no additional new housing should be allocated in village clusters as it will cause additional vehicle journeys and increase.</p>	<p>increase number of private vehicles and conflict with aim of managing travel demand; most new housing in villages will not have access to public transport; it will not help to keep shops open and will increase delivery / service vehicles.</p> <p>There should be no new housing in village clusters</p>
21475 Hempnall Parish Council	Object	<p>The words “as appropriate” in the policy means the requirements are far too open to interpretation and will mean opportunities to mitigate and adapt to climate change will be missed.</p> <p>This is particularly relevant when considering how new housing development in the village clusters will fulfil the requirement to ensure safe, convenient and sustainable access to on-site and local services and facilities . The rationale for village clusters seems mainly based on availability and accessibility of a primary school. Safe, convenient and sustainable access to the other features on this list are equally important. Many sites in village clusters do not have adequate access to facilities and so should not be included.</p>	<p>Use of “as appropriate” is too open to interpretation.</p> <p>Rationale for village clusters is overly reliant on access / availability of a school; other facilities are equally important.</p>

		<p>There is a conflict between point 6 on encouraging public transport and managing travel demand, and new housing within village clusters. Public transport may not be available e.g. for Hempnall no public transport links to nearby Key Service Centres and links to Norwich are inadequate. For new housing in village clusters most working residents will not have good access to services and local jobs. There will be an increase in the number of journeys by private vehicles, which will not be electric-powered certainly for the majority of the plan period. Additional housing is unlikely to keep a village shop open, but will increase the number of journeys made for delivery and service vehicles, making this housing even more unsustainable.</p> <p>To minimise pollution under point 8, no additional new housing should be allocated in village clusters as it will cause additional vehicle journeys and increase.</p>	<p>Sites in villages without access to facilities should not be included.</p> <p>Putting development in villages will increase number of private vehicles and conflict with aim of managing travel demand; public transport is inadequate (e.g. Hempnall); it will not help to keep shops open and will increase delivery / service vehicles.</p> <p>There should be no new housing in village clusters</p>
21624 Persimmon Homes (Anglia)	Object	The requirement for major developments to provide a Sustainability Statement is supported. However, the requirement for specific types of development to include a Health Impact Assessment is questioned.	Support for requiring a sustainability statement, but

			question need for Health Impact Assessment
21707 Engena	Object	Terminology needs to be more carefully worded, particularly 'The NPPF also requires a positive approach to large scale renewable energy generation except for onshore wind energy development.' Without amendment the policy is unreasonable and restrictive. The 'preferred approach' implies footnote 49 of the NPPF which does not need to be repeated in local policy. A positive approach can be taken to onshore wind if the stipulations of NPPF Footnote 49 are met. The NPPF promotes sustainable development and therefore excluding onshore wind from the positive approach to planning is a policy conflict.	Review wording of policy as it is unreasonable and restrictive, and does not follow NPPF and footnote 49. NPPF does not need to be repeated.
21809	Object	<p>Because of flooding issues in the UK and this area, it is recommended that the GNDP should include in the GNLP website FAQs section the question: Is my home or premises safe from flood risk? We are situated on a large flood plain where extensive development is taking place and more planned, despite being designated a high flood risk area and where risk of flooding to existing homes is a very real concern.</p> <p>Compliance with guidance from PPG 25 and PPSs 25 on Development & Flood Risk and incorporated into National Planning Policy Framework should be a legal requirement and not optional.</p> <p>Major concern about the impact of development on flood risk in Sprowston has been communicated, evidenced and reported on for many years when Guidance from PPS25 Development & Flood Risk and NPPF yet guidance on obligations to and involvement of residents has been ignored by the designated Local Authority.</p> <p>There should be detailed feedback on the effectiveness of measures taken to ensure effective drainage, especially now with concerns about climate change</p>	<p>Area is at risk of flooding.</p> <p>Development should comply with national policy and guidance.</p> <p>Residents need to be informed of the facts and their views should not be ignored.</p> <p>Drainage systems should protect existing residents;</p>

		<p>that this 2020 Consultation gives more credence to.</p> <p>In consulting on further developments residents need to be informed of key facts and be assured that all guidance has been followed and all FRAs properly ratified. The total drainage system needs to be explained to prove that existing homes are fully protected because previous FRA's have been flawed when key facts were ignored or not known.</p> <p>The approach to assessing risk using interactive maps is applauded but these need to be kept up to date where there is a lot of development planned but not completed.</p>	<p>previous FRAs have been flawed.</p> <p>Interactive maps should be kept up to date.</p>
21824 Barford and Wrampingham Parish Council	Object	<p>Object to the policy of Village Clusters as it contradicts the key environmental criteria for sustainability regarding the excessive and unnecessary use of green belt, the unsustainability of adding to villages thereby stretching the use of their already stretched and often minimal services.</p> <p>The key village cluster site in the Tiffey and Tud valleys is in the flood plain, regularly floods and is highly unsuitable for house building. This has been highlighted previously but seems to be ignored. It gives the impression that the Authorities are unaware of the increase in rainfall that now occurs as a result of global warming. The area is also an important green infrastructure corridor as highlighted in Figure 8.</p> <p>Complementing points made to Q6, the large area of possible developments north of Wymondham (GNLP0525R and thereabouts) and the proposed village cluster sites at GNLP0415R-A-G. GNLP0415R-A, GNLP0415R-B, GNLP0415R-C, GNLP0415R-D, GNLP0415R-E, GNLP0415R-F and GNLP0415R-G around Honingham and Colton, and on those around Wrampingham and Barford GNLP0552 & GNLP1013 & GNLP0416, will result in a massive additional run-off into the local rivers Tiffey and Tud, and increase the likelihood of flooding in</p>	<p>Object to the Village Clusters policy as conflicts with environmental and sustainability criteria and capacity of services.</p> <p>Village cluster site in Tiffey & Tud valleys is in flood-risk area, (with rainfall likely to increase with global warming), and in important GI corridor.</p>

		<p>Barford and Wrampingham. Barford in particular suffers considerably from high water levels, and additional housing north of Wymondham and around Honingham will exacerbate this. Development in these areas will also ruin the landscape value of the areas.</p> <p>Proposed sites on northern & southern water catchment areas of River Tiffey and River Tud, the confluence of which forms the extreme western tip of our Parish Boundaries, will increase drainage into the rivers so that flooding/increased water flow upstream of the confluence will affect both villages.</p>	<p>Impact of water run-off from a number of sites in the area, including effect on Barford & Wrampingham.</p>
<p>21850 Hempnall Parish Council Also see 21475 Object</p>	Object	See 21475 Object	
<p>21925 Horsford Parish Council</p>	Object	<p>POLICY 2 SUSTAINABLE COMMUNITIES states, Development must be high quality, contributing to delivering inclusive growth in mixed, resilient and sustainable communities and to mitigating and adapting to climate change, assisting in meeting national greenhouse gas emissions targets.</p> <p>To achieve this, development proposals are required as appropriate to: 1. Ensure safe, convenient and sustainable access to on-site and local services and facilities including schools, health care, shops, leisure/community/faith facilities and libraries.</p> <p>In Horsford the B1149 cannot cope with the amount of traffic now passing through and using the Broadland Northway. There are tailbacks and heavy congestion at peak times going out of the village from Brewery Lane Roundabout as far back into the village as Gordon Godfrey Way on Holt Road</p>	<p>Development in Horsford does not comply with the policy.</p> <p>Horsford has heavy traffic congestion that will be increased by additional development; road infrastructure is deficient (e.g. new roundabout</p>

	<p>(approx. 3 miles) and equally in the evening traffic along Reepham Road from Hellesdon to Horsford. Once there was a choice of four roads in and out of the village - now there are only two - Brewery Lane and Church Street. Further development would increase numbers of vehicles, exacerbate vehicle movements and increase environmental pollution, which conflicts with Policy 2 regarding meeting national greenhouse gas emissions targets. Any additional housing developments should be located in or closer to Norwich, where there are far more realistic opportunities for people to walk or cycle to work.</p> <p>This is also in conflict with Paragraph 6 in the introduction to the GNLP. The GNLP must also assist the move to a post-carbon economy and protect and enhance our many environmental assets.</p> <p>There are also concerns about the access road from Green Lane/Flag Cutters Way on to the Holt Road. The roundabout is not fit for purpose because it is offset and traffic coming out of Flag Cutters Way is obscured from traffic travelling South towards the roundabout. There have been occasions when HGV traffic has ignored the roundabout and continued straight on avoiding the roundabout altogether. Damaged kerbstones and central grassed area of the roundabout, where vehicles have driven over the roundabout when negotiating it, confirms poor design. This needs to be rectified. Norfolk Highways Department have accepted there is a problem and have put in a temporary 20 mph speed limit in the area either side of the roundabout. Horsford Parish Council believe this roundabout should be at the centre line of the B1149 and want to see a proposal to move the roundabout to that central position.</p> <p>There are only two pedestrian crossings in the village, one co-located with Mill Lane, which has a lollipop lady controlling it during the twice daily school runs, and the other co-located with the Primary School. The speed limit within the village is 30 mph but the residents feel strongly that this is often exceeded,</p>	<p>on Holt Road and shortage of crossings); and the speed limit is often exceeded.</p> <p>Other locations closer to Norwich are more appropriate for development.</p> <p>School and doctor's surgery at capacity.</p> <p>The assessment booklet has incorrect information re library and public house.</p>
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		<p>which, coupled with the amount of large HGV traffic, makes the road more dangerous.</p> <p>Another constraint on further development, is the lack of school places in the Primary school. In the Horsford Assessment Booklet Page 1, current capacity at Horsford Church of England VA Primary School is rated as “amber”, consequently it is considered that the Horsford cluster could accommodate development in the region of 20-50 dwellings. Without expansion school capacity could be a possible constraint on further development.</p> <p>Within the last 12 months, Horsford Medical Practice has also written to Broadland District Council in regard to increased population following further development numbers and the inability to register any more patients as they are at capacity, which is also in conflict with GNLP Policy 2 to ensure safe and convenient health care. Horsford Parish council believes that increased housing has already and will continue to put a strain on the services that exist in order to sustain the village.</p> <p>The first paragraph in the Horsford Assessment Booklet refers to both a library and a public house in the village. However, there are no public houses in the village now and there has only ever been a mobile Library.</p>	
22021 Mulbarton Parish Council	Object	<p>The words “as appropriate” in the policy would mean that the requirements are far too open to interpretation as to what is “appropriate”.</p> <p>“Village clusters “are detrimental as they would lead to an increase in petrol and diesel-powered vehicle journeys to and from Mulbarton to work places and with internet based deliveries.</p>	<p>The use of “as appropriate” is too open to interpretation.</p> <p>Village clusters will increase vehicle journeys and</p>

			deliveries to / from Mulbarton.
22284 Savills on behalf of Hugh Crane Ltd	Object	<p>The requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations is not supported by the evidence that the policy relies upon.</p> <p>There is no justification for the lack of any alternative approaches.</p> <p>Consideration could be given to wording which ~encourages a 20% reduction against Part L of the 2013 Building Regulations”.</p>	<p>The requirement for 20% energy reduction against Building Regs is not supported by evidence; should consider changing to “encourages a 20% reduction”.</p> <p>The lack of alternative approaches is unjustified</p>
22531 Historic England	Object	<p>There is no mention of the historic environment in this policy on sustainable communities. Paragraph 8 of the NPPF makes it clear that achieving sustainable development means that the planning system has three overarching objectives, the third of which is an environmental objective to contribute to protecting and enhancing our natural built and historic environment. To that end we would expect to see reference to the historic environment in the policy on page 61 and also in the key issues addressed by the policy as set out in Table 2.</p> <p>Suggested change: Include reference to the historic environment in the policy as required by para 8 of the NPPF.</p>	<p>Lack of a reference to historic environment conflicts with NPPF para 8 (in policy and Table 2).</p>

<p>22923 Savills on behalf of Barratt, David Wilson Homes</p>	<p>Object</p>	<p>The requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations is not supported by the evidence that the policy relies upon.</p> <p>There is no justification for the lack of any alternative approaches.</p>	<p>The requirement for 20% energy reduction against Building Regs is not supported by evidence.</p> <p>The lack of alternative approaches is unjustified</p>
<p>22970 Pegasus Planning Group On behalf of Barratt David Wilson Homes</p>	<p>Object</p>	<p>Policy 2 includes the requirement to “ensure the effective use of land” by requiring indicative minimum densities of 25dph across the plan area and 40dph in Norwich. It is not explained whether y whether these figures are gross or net. The Policy should clarify that these are net figures.</p> <p>The proposed uplift in housing numbers for Cringleford would deliver approximately 360 homes across two sites with a combined net developable area of approximately 13.5ha. This would result in an average density of only 26dph across both the sites. As Cringleford is a fringe parish of the Norwich urban area it is identified as being at the top of the hierarchy for locating new growth. Therefore, this low density, only 1dph above the indicative minimum for the wider local plan area and 15dph below the indicative minimum for Norwich would not accord with the requirement of Policy 2 to “ensure the effective use of land”.</p> <p>On Cringleford the use of 44dph means that the most effective use of the land will be to accommodate approximately 500 dwellings on site GNLP0307 alone.</p>	<p>Reference to density should be “net”.</p> <p>Proposed housing numbers on Cringleford site will conflict with policy requirement to ensure effective use of land, and NPPF and what has been accepted on other developments, and the 40 dph allowed in Norwich urban</p>

		<p>However, the proposed uplift in the allocation would result in our clients site and site GNLP0327 delivering the 360 additional homes at a density nearer to 25dph rather than the 40dph identified for sites in the Norwich urban area. This is not in accordance with the requirements of the NPPF, draft Policy 2 or the approach that has been accepted for other development sites in Cringleford.</p>	<p>fringe. Using 44dph means effective use of land will give approx. 500 dwellings on site GNLP0307 alone.</p>
<p>23029 Hingham Parish Council</p>	<p>Object</p>	<p>Supports the policy but questions its deliverability when proposed housing sites do not meet it, with specific reference to Hingham. It is disappointing that the GNLP housing development site assessment has concluded that a Preferred option GNLP0520 is contrary to this policy on several counts. The development would not be able to meet the requirements of the policy. Information should be sought from residents affected by or potentially affected by flooding in the vicinity of a proposed site allocation or development, rather than accepting the submittance from the developers that flooding has been / can be mitigated.</p> <p>Re policy 2 i Community engagement should be mandatory for any development that would have a significant impact on a community, and not just sites of 200+ homes, e.g. a development of 80 houses in Hingham would have a significant impact, in terms of integrating into the community, burden on local facilities such as Drs surgery and school, parking issues, as well as the visual and character impact a development would have on a small historic town such as Hingham.</p>	<p>Support for policy in principle but proposed housing site does not comply with the policy.</p> <p>Information on flood -risk should be obtained from local residents, and not rely on developer's statements.</p> <p>Community engagement should apply to all development, smaller developments can</p>

			have an impact on character, infrastructure etc..
23080 David Lock Ass. On behalf of Orbit Homes	Object	<p>We wholly support the sustainable communities policy. This should underpin the spatial growth strategy and sites that are best able to perform against these sustainability requirements should be the ones selected for allocation.</p> <p>However, we consider that the Plan does not effectively translate its aims and objectives in relation to delivering sustainable communities into its spatial strategy. It fails to acknowledge the ability of larger strategic scale developments to achieve these policy requirements, many of which are inherent in the design of new settlement scale developments.</p> <p>The opportunity at SGV truly stands apart from other strategic growth opportunities in its sustainability and energy offer. One of the central features of SGV, as demonstrated in the Prospectus, is its ability to be aligned with the delivery of a solar farm on adjacent land under the control of the same landowner.</p> <p>In this context, Orbit have explored the measures necessary to achieve a NetZero development from the outset and put forward SGV on this basis. The detail of how the scheme could achieve NetZero is set out in Sustainability, Energy and Climate Change Strategy as part of the technical assessment in Appendix 4. To inform this Strategy estimates of possible construction and operational stage carbon emissions and costs estimates to address these emissions to net zero through on-site renewable energy, tree planting and carbon offsetting have been undertaken.</p>	<p>Policy supported and it should underpin growth strategy and site selection. However the Plan does not do this – it does not acknowledge the value of large scale settlements.</p> <p>SGV is better than other strategic growth opportunities in its sustainability and energy offer e.g. solar farm, and ability to achieve Net Zero Carbon. If allocated it will demonstrate how Policy 2 can be met.</p>

		<p>SGV as a prospective allocation would establish an important precedent for the GNLP area in demonstrating how requirements of Policy 2 can be met. It is vital that in preparing Local Plans, policy-makers are proactive in establishing policies to tackle climate change.</p> <p>It is imperative that GDNP realise their ambitions as set out in Policy 2 in light of the growing global climate change challenge. Without such commitments the GDNP will fall short of making a meaningful contribution in the fight against global climate change.</p> <p>The use of zero-carbon and energy-positive technology is one of the integral Town and Country Planning Association Garden Village principles which have been used to shape the SGV proposal since its inception. We contend that the use of the Town and Country Planning Association Garden Village principle framework ensures that GV proposals, in particular SGV, are better placed to respond to climate change issues than small medium scale development as sustainability principles are embedded within the design of such schemes.</p>	<p>To meet the challenge of climate change the ambitions of Policy 2 must be realised. Zero carbon / energy technology is integral to TCPA Garden Village principles used for the SGV proposal. As such Garden Village proposals, particularly SGV, are better able to address climate change issues than medium scale development.</p>
20879 Town & Country Planning Assn	Support	<p>The TCPA is very pleased to see that Policy 2 has a strong focus on mitigating and adapting to climate change which is a national priority. However, the policy wording could be strengthened regarding healthier communities by including reference to ensuring new developments are designed to promote active lifestyles through physical activity such as walkable communities and connected pedestrian and cycle routes (please see Sport England and Public Health England's Active Design principles: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design). A commitment to reducing health inequalities would also be highly beneficial in addressing the health and wellbeing needs of the local population.</p>	<p>Support the policy but it could be strengthened re healthier communities with reference to design to promote active lifestyles (set out in Sport England / Public Health</p>

			<p>England “Active Design”).</p> <p>Should be a commitment to reducing health inequalities in addressing health and wellbeing needs of the popn.</p>
<p>21184 Bidwells on behalf of Hopkins Homes, Persimmon Homes, Taylor Wimpey</p>	<p>Support</p>	<p>The principle of ensuring that developments are high quality and contribute to delivering inclusive growth in mixed, resilient and sustainable communities, whilst assisting in mitigating and adapting to climate change, is supported. The requirement for major developments to submit a Sustainability Statement is also supported, as is the requirement for Delivery plans to be provided.</p>	<p>Support ensuring development is high quality, delivers inclusive, resilient, sustainable communities, and adapts to climate change. Requirement for Sustainability Statement and Delivery Plans also supported.</p>
<p>21207 Bidwells on behalf of Kier Living Eastern Ltd</p>	<p>Support</p>	<p>The principle of ensuring that developments are high quality and contribute to delivering inclusive growth in mixed, resilient and sustainable communities, whilst assisting in mitigating and adapting to climate change, is supported. The requirement for major developments to submit a Sustainability Statement is also supported, as is the requirement for Delivery plans to be provided.</p>	<p>Support ensuring development is high quality, delivers inclusive, resilient, sustainable</p>

			communities, and adapts to climate change. Requirement for Sustainability Statement and Delivery Plans also supported.
21738 Brown & Co	Support	We support the preferred approach to sustainable communities, including the need for a Sustainability Statement. It is considered that adherence with all of the provisions of Policy 2 as proposed should be the norm for all future development in order to deliver sustainable development.	Support policy including requirement for Sustainability Statements. Adherence to the policy should be the norm in order to deliver sustainable development.
21833 Natural England	Support	We welcome the production of Table 8 Key Issues addressed by policy 2 and agree with the issues covered. In relation to issue 3.Green infrastructure it is appropriate for developments to be required to deliver GI off-site, or to financially contribute to this, where it is not possible to deliver quality GI which meets the needs of the inhabitants within that site. It would be useful to state here that development is expected to avoid loss or severance of existing GI networks, and to contribute to the enhancement and extension of existing GI on-site in order to strengthen these networks.	Agree with Key issues identified. GI provision is acceptable off-site if cannot be provided on-site. Development should avoid loss or severance of GI

		<p>With regard to issue 9. Water the findings of the draft WCS should be referred to, and used to update the table text. A clear intention to adopt the higher standard for water of 110 litres per person per day needs to be stated in the policy. Mention is made of the need to retrofit existing housing and employment stock with water efficiency measures, which we support, and recommend that the Plan should contain a policy which supports this measure.</p> <p>We support the production of a Sustainability Statement for major developments.</p> <p>Q19. Do you support, object or have any comments relating to the specific requirements of the policy?</p> <p>We warmly welcome and support this policy.</p> <p>Under (3) we consider the provision of accessible GI for recreational uses should be included within the policy. This is necessary to help mitigate the impacts of additional recreational pressure from new housing development on designated sites.</p> <p>Under (9) we endorse the adoption of the higher standard for water efficiency under the Building Regulations, which is also supported by evidence in the WCS. Reference to retrofitting existing buildings with water efficiency measures has also been as identified as essential in the WCS in terms of managing water demand. We suggest it would be appropriate to include some wording in this policy which recognises this need, and supports its implementation should Government adopt this approach in future.</p>	<p>networks and contribute to strengthening them.</p> <p>Support production of Sustainability Statements for major development.</p> <p>?? Comments on Q19.</p>
21996	Support	The Town Council supports the requirements for Developments set out in Policy 2 (Sustainable Communities). We also feel that developments should provide	Support Policy.

Redenhall with Harleston Town Council		on-site green infrastructure with access to electric car and electric bicycle charging points.	Developments should provide on-site GI and access to electric car and bicycle charging points
22089 Watkin Jones Group	Support	WJG support these objectives for creating a vibrant and inclusive area that is enhanced by new homes, infrastructure and environment.	Support Policy
22132 Strutt & Parker On behalf of M Scott Properties Ltd	Support	The preferred approach to sustainable communities is the requirement for sustainability assessments to accompany planning applications for major developments. This approach is supported and is considered to be in line with the National Planning Policy Framework.	Requirement for sustainability statements for major developments is supported and accords with NPPF
22403 Norwich Green Party	Support	<p>We support the requirement for a sustainability statement.</p> <p>Green infrastructure: essential to incorporate some element in all but minor developments ('Net Biodiversity Gain'). Green infrastructure should be defined to include a range of features including, trees, hedges, green roofs, green walls, verges, small biodiversity features etc. Removal of verges and trees to construct local active travel initiatives is unacceptable.</p> <p>Densities: housing densities should not be under-mined by parking standards. Use of land for parking to boost developer profits is unsustainable.</p> <p>Travel: levels of parking help to determine the level of private car use. Lower ratios of parking to numbers of dwellings are required to make efficient use of</p>	<p>Support requirement for Sustainability Statements.</p> <p>GI essential in all but minor development; and the range of GI should be defined. Active travel initiatives should</p>

		<p>land; encourage modal switch and reduce carbon emissions (a switch to electric vehicles will not solve emissions from road transport). Parking standards in new developments should be lowered across Greater Norwich.</p> <p>Energy: see response to Q19. Meanwhile, MHCLG has indicated an intention to publish a Future Homes Standard which will require up to 80% lower carbon emissions for all new homes from 2025.</p>	<p>not remove verges and trees.</p> <p>Housing densities should not be under-mined by the provision of parking.</p> <p>Level of parking should be reduced to make efficient use of land, encourage less cars and reduce emissions. A switch to electric vehicles will not solve emissions from road transport.</p> <p>MHCLG proposed a Future Homes Standard that will require lower carbon emissions for all new homes from 2025.</p>
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<p>22633 Bidwells On behalf of M Scott Properties</p>	<p>Support</p>	<p>The principle of ensuring that developments are high quality and contribute to delivering inclusive growth in mixed, resilient and sustainable communities, whilst assisting in mitigating and adapting to climate change is supported. To demonstrate the ability to secure these objectives, we support the preparation of a Sustainability Statement as part of an application for a major development. The use of master planning, in conjunction with community engagement, and provision of Delivery plans is also supported.</p> <p>Whilst the requirement to ensure the efficient use of land by, amongst other things, providing an indicative minimum density of 25 dwellings per hectare, is supported, the policy, or supporting text, should make it clear that, as well as giving consideration to on site characteristics, consideration will be given to a range of other site / scheme specific issues, such as housing mix and design considerations. For example, the inclusion of bungalows within a development to meet an identified need is likely to result in a lower density development, although a density of 25 dwellings per hectare should still be achievable on a net basis.</p>	<p>Support ensuring development is high quality, delivers inclusive, resilient, sustainable communities, and adapts to climate change.</p> <p>Requirement for Sustainability Statement, masterplanning and Delivery Plans also supported.</p> <p>Support an indicative minimum density, but consideration should include other site / scheme specific issues e.g. housing mix, design, inclusion of bungalows etc will affect density.</p>
<p>22728</p>	<p>Support</p>	<p>Our client supports the Councils approach to sustainable communities and the requirement for housing developments of 100 dwellings or more to submit a Delivery Statement such that the key objectives of Policy 2 are implemented</p>	<p>Policy and requirement for Delivery</p>

Pegasus Group on behalf of Halsbury Homes Ltd		<p>which reflect the overarching aims of the NPPF. They also believe that their site at Land off Norton Road, Loddon would align with these objectives in the delivery of a sustainable community.</p> <p>Land off Norton Road is considered to be located in a sustainable location as it is easily accessible to Loddon High Street (less than 10 minutes walk from the site), which has an excellent range of shops, services, employment opportunities and bus stops with a frequent bus service to Norwich city centre (one bus every 30 minutes). Furthermore, there are employment opportunities available at Loddon Industrial Estate (less than 10 minutes walk from the site). By affording sustainable levels of growth to areas such as this it will assist in safeguarding existing services, public transport links and infrastructure which local people currently rely upon and support vibrant rural communities.</p> <p>Our client is actively developing sites across Greater Norwich, which have delivered well-designed and high quality developments which are long lasting and make the best use of the land available through appropriate housing densities. The proposed development at Land off Norton Road would similarly align with this with indicative minimum densities of 25 dwellings per hectare across the plan area. It would be designed in such a way that actively encourages walking and cycling.</p>	<p>Statements supported.</p> <p>Site in Loddon would align with these objectives.</p>
22790 Strutt & Parker	Support	The preferred approach to sustainable communities is the requirement for sustainability assessments to accompany planning applications for major developments. This approach is supported and is considered to be in line with the National Planning Policy Framework.	Requirement for sustainability statements for major developments is supported and accords with NPPF
22881 Bidwells	Support	The principle of ensuring that developments are high quality and contribute to delivering inclusive growth in mixed, resilient and sustainable communities, whilst assisting in mitigating and adapting to climate change is supported. To	Support ensuring development is high quality,

		<p>demonstrate the ability to secure these objectives, the preparation of a Sustainability Statement as part of an application for a major development is supported.</p> <p>Whilst the requirement to ensure the efficient use of land by, amongst other things, providing an indicative minimum density of 25 dwellings per hectare, is supported, the policy, or supporting text, should make it clear that, as well as giving consideration to on site characteristics, consideration will be given to a range of other site / scheme specific issues, such as housing mix, design considerations and the densities of the surrounding area.</p> <p>Reference made to site at Horsham St Faith</p>	<p>delivers inclusive, resilient, sustainable communities, and adapts to climate change.</p> <p>Requirement for Sustainability Statement and Delivery Plans also supported.</p> <p>Support an indicative minimum density, but consideration should include other site / scheme specific issues e.g. housing mix, design, surrounding densities.</p>
22969 Pegasus Planning Group on behalf of Barratt David Wilson Homes	Support	<p>Our client supports the Councils placing greater emphasis on climate change and believes that the most appropriate way to meet these objectives is by locating new development in sustainable locations. Cringleford, which is identified as a fringe parish of the Norwich urban area, meets the criteria for delivering a sustainable community as the village has good access to services and facilities. Moreover, sites already consented in the village are already providing green infrastructure and promoting walking and cycling for new</p>	<p>Support for greater emphasis on addressing climate change.</p> <p>Achieve this by locating development in</p>

		<p>residents, which will create a more inclusive and social community. The delivery of sites where people can walk and cycle to meet their daily needs also helps residents to establish lifestyles that benefit their physical and social health.</p> <p>With growth already being successfully accommodated at Cringleford there are improvements to sustainable travel routes that will ensure that future and existing residents reliance on the use of the private car will be reduced. This reduction in car dependency will also help reduce the negative impacts that unsustainable modes of travel have on climate change through increased greenhouse gas emissions. Moreover, through the promotion of walking, cycling and public transport residents will experience more positive interactions with each other and other residents of Cringleford and beyond than if they were reliant on private cars to meet their daily needs. Therefore, Cringleford is clearly a village where available sites should be developed to accommodate the maximum number of new homes whilst still respecting the semi-rural character of the village.</p> <p>In order to meet the ambitious delivery programme for the Local Plan our client supports the requirement for housing developments of 100 dwellings or more to submit a Delivery Statement. Our clients commitment to the delivery of new homes in the Greater Norwich area means that they will be well placed to demonstrate further delivery of much needed new homes at their site in Cringleford.</p>	<p>sustainable locations e.g. Cringleford.</p> <p>Development is already being accommodated in Cringleford, with improvements being made to sustainable travel, reducing impact on climate change. Promotion of walking, cycling and public transport will give positive social interactions.</p> <p>Available sites in Cringleford should be developed.</p> <p>Support requirement for a Delivery Statement, and</p>
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			client will be able to deliver on their site at Cringleford.
23021 Bidwells	Support	<p>The principle of ensuring that developments are high quality and contribute to delivering inclusive growth in mixed, resilient and sustainable communities, whilst assisting in mitigating and adapting to climate change is supported. To demonstrate the ability to secure these objectives, the preparation of a Sustainability Statement as part of an application for a major development is supported.</p> <p>Whilst the requirement to ensure the efficient use of land by, amongst other things, providing an indicative minimum density of 25 dwellings per hectare, is supported, the policy, or supporting text, should make it clear that, as well as giving consideration to on site characteristics, consideration will be given to a range of other site / scheme specific issues, such as housing mix, design considerations and the densities of the surrounding area.</p> <p>References made to site at Hingham</p>	<p>Support ensuring development is high quality, delivers inclusive, resilient, sustainable communities, and adapts to climate change.</p> <p>Requirement for Sustainability Statement and Delivery Plans also supported.</p> <p>Support an indicative minimum density, but consideration should include other site / scheme specific issues e.g. housing mix, design,</p>

			<p>surrounding densities.</p> <p>References made to site at Hingham</p>
<p>23137 Bidwells on behalf of Hopkins Homes</p>	<p>Support</p>	<p>The principle of ensuring that developments are high quality and contribute to delivering inclusive growth in mixed, resilient and sustainable communities, whilst assisting in mitigating and adapting to climate change is supported. To demonstrate the ability to secure these objectives, the preparation of a Sustainability Statement as part of an application for a major development is supported.</p> <p>Whilst the requirement to ensure the efficient use of land by, amongst other things, providing an indicative minimum density of 25 dwellings per hectare, is supported, the policy, or supporting text, should make it clear that, as well as giving consideration to on site characteristics, consideration will be given to a range of other site / scheme specific issues, such as housing mix, design considerations and the densities of the surrounding area.</p> <p>References also made to site at Aylsham</p>	<p>Support ensuring development is high quality, delivers inclusive, resilient, sustainable communities, and adapts to climate change.</p> <p>Requirement for Sustainability Statement and Delivery Plans also supported.</p> <p>Support an indicative minimum density, but consideration should include other site / scheme specific issues e.g. housing mix, design,</p>

			surrounding densities. References also made to site at Aylsham
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QUESTION 19

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 19 - Do you support, object or have any comments relating to the specific requirements of the policy?
TOTAL NUMBER OF REPRESENTATIONS:	48 (3 duplicates)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	8 Support, 14 Object, 26 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
19826	Comment	References to energy generation require it to be renewable and low carbon but do not mention that it should be clean in terms of air pollution. There is no point in having a renewable source of energy that pollutes the air we breathe. Wood, straw and other biomass fuels, whilst renewable, are not clean and can cause severe damage to the environments from which they are obtained. The GNLP should contain a clear indication that only clean renewable energy technologies should be used, e.g. not entirely based on government subsidies that can be withdrawn at any time.	Only clean renewable technologies should be used., and not based on subsidies that can be withdrawn. Renewable fuels, such as biomass, pollute and cause harm to environment they are obtained from.
19867 Norfolk Constabulary	Comment	Designing Out Crime Officer supports key issue #7 (Table 8) the establishment and maintenance of resilient, safe and inclusive communities and key issue #1 to provide convenient, safe and sustainable access to facilities. "Safe" should be interpreted as secure and that the principles of	Support for key issues 7 and 1.

		Secure By Design (SBD) – are incorporated, as in line with Govt directive. Attention is drawn to NPPF, particularly section 8 para 91, and Planning Practice Guidance (PPG) on creating safe and accessible communities. Para 164 advises working with local advisors to take into account the most up-to-date information about higher risk sites in their area for malicious threats and natural hazards, including steps that can be taken to reduce vulnerability and increase resilience.	Consider references to NPPF and Planning Practice Guidance.
20622	Comment	<p>There is a need for a maximum density policy, or for higher density developments to be subject to extra scrutiny, to ensure a good quality of life for residents.</p> <p>The Plan should lobby Govt for higher water efficiency standards.</p> <p>There should be more ambition on sustainable energy.</p> <p>If buildings are not carbon neutral they will be unviable by the end of the Plan, which will require expensive retro-fitting. More energy efficiency and renewable energy should be explored. E.g. see Salford LP.</p> <p>Encouragement should be given to onshore wind energy e.g. through a guide for Neighbourhood Plans. E.g. see Cornwall guide.</p> <p>A policy should support community food growing, in support of environmental, social and health objectives. Allotments can be difficult to provide in urban areas. Examples of such a policy include Bristol, Lambeth, Brighton & Hove. Wording suggested for a new policy requiring or encouraging provision of community food growing in developments etc.</p>	Need for a maximum density (or extra scrutiny) requirement. Lobby for higher water efficiency standards. Higher sustainable energy requirements.(energy efficiency and renewables) with aim of buildings being carbon neutral. Encouragement for onshore wind energy. Require or encourage community food growing within developments.
20673 CPRE	Comment	<p>Re Table 8</p> <p>Point 3, Green Infrastructure.</p>	NPPF supports biodiversity on a

		<p>The NPPF is also supportive of biodiversity on a more strategic scale, and the importance of ecological networks and Nature Recovery Networks. While Green Infrastructure is useful, and can play a role in these, it clearly has limitations in a wider role across the wider countryside, and in linking high designated nature conservation sites.</p> <p>Point 5, Landscape, should recognise that valued landscapes often sit with good wildlife habitats. e.g. river valleys and the Broads. The Environment Plan and recent Landscapes Review recommend making links between landscapes and wildlife, and not consider them in isolation. Also see response to Q21.</p> <p>Point 9, Water. It needs to be recognised that SUDS is not a silver bullet when dealing with flood risk. Areas of low-lying land with a high water-table can present a problem in ~getting the water away, and if it does manage to do that existing settlements can be put at risk.</p> <p>A high level of growth puts a greater pressure on the capacity of Waste Water Treatment Works, both on the discharge of effluent into river systems, and on flood risk with foul water. This will be exacerbated by under or lagging investment in WWTW. Although not the responsibility of the Greater Norwich Authorities, their Annual Monitoring Reports (AMRs) should record and monitor incidents.</p> <p>Point 9, Water - The closing note at the bottom of the wording states: ~Implementation of the standards for water efficiency will be supported by an updated advice note”.</p> <p>We comment that it is imperative that Per Capita Consumption (PCC) of water is further reduced below the Government's prescribed 110 litres per</p>	<p>strategic scale, GI is too limited.</p> <p>Links should be made between landscape and wildlife habitats.</p> <p>SUDS are not suitable in some areas.</p> <p>High levels of growth put pressure on WWTW. Incidents should be recorded in AMRs.</p> <p>More demanding standards on water efficiency should be applied, particularly given the high levels of growth.</p>
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		<p>person per day in order to deliver the statement made in Section 3, paragraph 129. East Anglia is the driest region of the UK: our aquifers, rivers and wetlands are already at breaking point, as are many of the region's farmers who are seeing their abstraction licences reduced or revoked. If more demanding standards to reduce PCC water consumption are not set as part of the local plan, this will further adversely impact upon the environment, impacting upon the Broads and wetlands, which in turn will impact the regions aspirational growth for tourism and will severely impact the regional agricultural economy.</p> <p>These pressures are further evidence as to why the amount of new housing should be tightly controlled.</p>	
12361	Comment	<p>10 ii Masterplanning. A requirement for 200 houses needing masterplanning will lead to lots of 190 house developments meaning non-integrated planning for larger sites e.g. GT7 Salhouse Road developments. Similarly there should not be a specific number before delivery plans are required.</p> <p>Can this not be at Officer (Authority) discretion with a condition requirement?</p>	The threshold for masterplanning and delivery plans should not apply, but be at local authority discretion.
21099 R. Parkinson on behalf of Saving Swainsthorpe Campaign	Comment	As the GNLP produces further iterations of this plan there must be inclusion of specific targets to community involvement and pre planning application consultation.	Include targets for community involvement / consultation
21101 R. Parkinson on behalf of Saving Swainsthorpe Campaign Also see 21102	Comment	We endorse and fully support the comments made by CPRE in relation to Green Infrastructure, landscape, water	See CPRE comments

<p>21260 Anglian Water Services Ltd.</p>	<p>Comment</p>	<p>Anglian Water fully supports the optional water efficiency standard being applied to residential development as set out in the Policy 2 and that highest standard possible would be applied. It is considered that that the policy should also include reference to integrated water management, water re-use, foul drainage and sewage treatment together with asset encroachment (wording suggested)</p>	<p>Support for highest water efficiency standards. Reference should be made to integrated water management, water re-use, foul drainage and sewage treatment and asset encroachment.</p>
<p>21528 Hingham Parish Council Also see 23032</p>	<p>Comment</p>	<p>As the Council have declared a climate emergency we believe that any new housing should be as energy efficient as possible and this is beyond the present building regs it should still be required. The use of community battery schemes would be useful in taking excess power generated during the day and making it available at night. If we are going to be required to drive electric cars then there will be a need for a much enhanced grid and the large power stations could be supplemented by local generation. On a historic note Hingham did at one time have its own gas works and similar small scale electrical generation should be welcomed</p>	<p>Energy efficiency above building regs should be required. Encouragement of Community battery schemes. Electric cars will require an enhanced grid and large power stations supplemented by local generation. (e.g. welcomed at Hingham).</p>
<p>21611 Aylsham Town Council</p>	<p>Comment</p>	<p>The policy on flooding (item 9) could be strengthened by actually encouraging no additional hard surfaces outside the highway within a distance of one mile into a flood plain. Recent issues have shown the devastation excessive rain can have when rivers fill and although this has not been an issue for Norfolk the situation is only likely to get worse.</p>	<p>Should be no new hard-surfaces outside highway within one mile into a flood plain.</p>

<p>21667 Persimmon Home (Anglia)</p>	<p>Comments</p>	<p>Point 2: importance of this is recognised.</p> <p>Re electric vehicles - acknowledge the environmental importance of them and the Govt target for zero emissions by 2040. The transition to electric vehicles is still at a relatively early stage and the existing electricity network may be limited in terms of accommodating electric vehicle charging.</p> <p>Policy 2 must be informed through consultation with UKPN to ensure that the associated requirements are deliverable without creating any unsustainable pressure upon the network.</p> <p>New and changing technologies must be factored into the Viability Report as they have cost implications for new development.</p> <p>Point 4: The approach to encouraging higher densities in more sustainable locations is supported, but indicative minimum densities should be higher, especially if the policy objective of making efficient use of land is to be realised. It is considered that a minimum indicative density of 30 dwellings per hectare would be more appropriate in this respect, but that the Policy should acknowledge the suitability for higher densities more generally, for example in town centres where sustainable transport links and good access to jobs/services are more likely to be available.</p> <p>Additional Strategic Gaps do not need to be designated. Since the existing Strategic Gaps were designated based on high level landscape assessment, policies should include sufficient flexibility to enable development in the Strategic Gaps where site specific LVIAs demonstrate there would not be a significant adverse impact.</p> <p>Points 9 & 10: water efficiency and energy demand, support a policy</p>	<p>Point 2 is important.</p> <p>Electricity network may be inadequate for electric vehicle charging. UKPN should be consulted to avoid pressure on the network.</p> <p>Consider cost of new technologies for development in Viability Assessment.</p> <p>For efficient use of land there should be a minimum density of 30 dwellings per ha with higher densities acknowledged in suitable locations e.g. town centres.</p> <p>No new Strategic Gaps. Policy should be flexible to allow development in gaps where there will be no significant impact.</p>
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		<p>approach that delivers consistency with the most up-to-date Building Regulation standards. E.g. the Policy must be updated to take account of changes to Part L of the Building Regs when implemented. The update to Part L of the Building Regulation may include a requirement for 31% reduction in carbon emissions compared to the current standard. Council’s Viability Report should include the potential cost implications of this.</p> <p>There needs to be a mechanism to consider any further changes to regulations that might carry implications for development viability so that these can be captured in the plan making process.</p> <p>The contribution that battery storage can make to enhancing energy resilience is recognised. However, at present, the costs of providing such infrastructure are high and the industry is hampered by a skills/knowledge gap. Local government should work collaboratively with developers to help research and fund energy storage schemes through pilot projects. Such an approach should be adopted before this aspect of the policy is taken forward.</p>	<p>The Policy should allow for water and energy efficiency requirements to reflect latest Building Regs, and take account of BRegs proposals in the Viability Assessment, and a mechanism to consider any changes in the future.</p> <p>Battery storage may enhance energy resilience but collaborative work needed to research and deliver them e.g. pilot project. Before this aspect of the policy is applied.</p>
21988	Comment	<p>Table 8 Point 3 Green infrastructure “Developments are required to provide on-site green infrastructure appropriate to their scale and location”. The guidance document on green infrastructure for developers should include: Green roofs and walls: at all scales of development ranging from house extensions to multi storey blocks. The city centre in particular is dominated by hard surfaces; green roofs and walls would create green stepping stones</p>	<p>Re Table 8: Point 3 GI – guidance document to include green roofs and walls for all development.</p> <p>Urban tree planting is strategically important</p>

		<p>and connect up ecological corridors such as rivers and railway lines.</p> <p>Urban tree planting in and around Norwich: increasing tree coverage should be viewed as strategically important and not simply as an add on extra. As the 25 Year Environment Plan makes clear, urban trees make towns and cities more attractive for living and working, they bring people closer to nature and improve air quality. As well as increasing the amount of tree cover in the built up area, we would ideally like to see large areas of woodland for public recreation planted close to the Norwich built up area, similar to the network of forests planted under England's Community Forest programme. Although this is unlikely under existing government funding, the Government has committed to increasing woodland coverage in the UK and future funding for agri- environment schemes might be at a level to stimulate the interest of local landowners. Private gardens; they are an important component of green infrastructure. We are seeing a trend for subdivision of gardens for housing development in Norwich and loss of these smaller green spaces is progressively chipping away at the city's green character. Although gardens will probably be regarded as an issue for local development management plans, we consider that this issue should be addressed at a wider level.</p> <p>Point 9, Water.</p> <p>We would like to see encouragement for initiatives for harvesting and storage of rainwater and water from flood management that can later be used for irrigation during dry periods. And SUDS using Green roves. For greater transparency, annual monitoring reports should not only report the number of applications approved contrary to Environment Agency advice on flood grounds, but should give detail on these applications, why they were approved, what the advice was, what measures have been taken to mitigate flood risk, and how impact is being monitored. Monitoring should also be</p>	<p>and should be increased , and large areas planted for recreation close to Norwich.</p> <p>Subdivision of gardens affects local character and should be addressed.</p> <p>Encouragement for water storage from floods and SUDS using Green rooves.</p> <p>AMRs should give more info an applications approved contrary to Env Agency advice.</p> <p>WWTW should be monitored e.g. discharge of effluent and flood risk with foul water.</p> <p>Welcome opportunities for sustainable local energy networks (ref to renewable energy targets).</p>
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		<p>done on of Waste Water Treatment Works, both on the discharge of effluent into river systems, and on flood risk with foul water.</p> <p>We welcome opportunities for the use of sustainable local energy networks but refer back to the targets for renewable energy mentioned above.</p>	
22175 Pegasus Group on behalf of Pigeon Investment Management	Comment	<p>Master planning</p> <p>4.15 Community engagement prior to submitting an application is supported. However, Policy 2 identifies master planning using a recognised community engagement process for schemes of more than 200 dwellings will be encouraged. It is not clear what is meant by such a master planning process and clarity would be welcomed.</p> <p>4.16 It is considered likely that such a master planning process would exceed the requirements of each of the joint authorities existing adopted Statements of Community Involvement and also goes beyond the requirements of paragraphs 39 to 41 of the NPPF and the PPG (20-010).</p> <p>4.17 Furthermore, there is no guarantee that the masterplan outcomes of such a community engagement process will be considered appropriate or acceptable by the local authority as there is no mechanism for validating the outcomes of the process pre-submission. This could result in difficulties for all parties at the application stage should masterplan amendments be required as a result of statutory and internal local authority consultations post submission.</p>	<p>Support community engagement for applications.</p> <p>Not clear what is meant by a masterplanning process.</p> <p>Such a masterplanning process would exceed the requirements of the lpa's SCIs and exceeds NPPF paras 39-41 and PPG (20-010).</p> <p>No guarantee that the masterplan outcomes will be approved, resulting in difficulties if amendments required post submission.</p>

<p>22176 Pegasus Group on behalf of Pigeon Investment Management</p>	<p>Comment</p>	<p>4. POLICY 2 SUSTAINABLE COMMUNITIES</p> <p>4.1 While we broadly support the overall aims and objectives of the GNLP to facilitate the growth and delivery of sustainable communities.</p> <p>Criteria 3</p> <p>4.3 This is supported as it provides for the environmental objective of sustainable development. Pigeons proposals at Wymondham will incorporate a landscaped buffer to the eastern boundary which will enhance the Green Infrastructure Corridor identified in the Wymondham Area Action Plan.</p> <p>Criteria 4</p> <p>4.5 The density of residential development at any site is dependent on other community infrastructure or site-specific requirements that may arise as a result of emerging GNLP planning policy. It may transpire that a site promoted to the plan can provide educational or health facilities in association with residential development. The need for highway infrastructure and sustainable drainage features to be provided at a site also should be taken into consideration. To that end the policy should be amended to state that;</p> <p>“the indicative minimum net density of the residential element of a site allocation should be 25 dwellings per hectare”.</p> <p>4.6 The Policy identifies that these minimum density standards are indicative. This is supported as it allows for flexibility to ensure that each parcel of land is used effectively, taking account of the type of development proposed, the site context and appropriate design characteristics.</p>	<p>Support overall aims and objectives.</p> <p>Criteria 3 supported. Green infrastructure in site at Wymondham accords with Wymondham AAP.</p> <p>Criteria 4 -Density of a site is dependent on on-site requirements. It should be changed to refer to indicative minimum net density of 25pha; - “indicative” is supported.</p> <p>Criteria 10 – standards on a buildings energy efficiency etc should reflect NPPF and PPG and be viable having regard to other costs on development. -What is the evidence for higher standards and why “at least 20%”?</p>
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		<p>Criteria 10</p> <p>4.8 The Planning Practice Guidance states that;</p> <p>The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building’s sustainability to do so in a way consistent with the government’s zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability. PPG Climate Change Paragraph: 009 Reference ID: 6-009-20150327 Last revised 27th March 2015</p> <p>4.9 PPG Paragraph: 012 Reference ID: 6-012-20190315, last revised 15th March 2019, states that Local Plans can set energy efficiency standards that exceed the energy efficiency requirements of the Building Regs, it also states that such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the code for Sustainable Homes which is identified as approximately 20% above current Building Regs across the build mix. The PPG also requires such policy requirements to be viable.</p> <p>4.10 The Code for Sustainable Homes was withdrawn in 2015 and replaced by technical housing standards. The GNLP Reg 18 has chosen to continue to pursue the 20% above Building Regs approach at criteria 10 of Policy 2.</p> <p>4.11 The Alternative approaches section states that this target is a challenging but achievable requirement and that to go beyond 20% would be unviable.</p>	<p>- Not clear that Viability assessment has taken account of this in conjunction with other policy requirements and across typologies.</p> <p>These policy requirements could prejudice the delivery of some sites.</p>
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		<p>4.12 What is not clear however is the Councils evidence to require energy savings of at least 20% above Building Regs when the PPG states approximately 20% across the build mix.</p> <p>4.13 It is not clear either whether this policy requirement has been appraised across a range of site typologies in the viability appraisal and whether it has been tested in conjunction with the other policy requirements of the plan, including those of emerging Policy H5 which seeks:</p> <ul style="list-style-type: none"> i. 33% affordable housing, (except in Norwich City Centre); ii. all new housing development to meet the Governments Nationally Described Space Standards; and iii. 20% of major housing developments to provide ~at least 20% of homes to the Building Regulation M4(2)(1) standard or any successor. <p>4.14 Whilst the objectives behind these are supported, taken together these emerging policy requirements of the plan could prejudice the delivery of some sites within the emerging plan.</p>	
22186 Environment Agency	Comment	<p>We would like to see a target percentage for green infrastructure within the development parcel. Biodiversity Net Gain doesn't seem, to be referenced in the table. In reference to point 9, water, in the key issues by policy 2 table on pages 57 and 58, this has not recognised the challenge ahead in finding water for developments and simply says that the cost of water efficiency measures is negligible and can be easily achieved. This is not necessarily the case as the water company has a duty to find water. However, there is no water available and there is a significant challenge in sourcing water for the growing population and new developments.</p>	<p>Suggest having a target percentage for GI.</p> <p>Biodiversity Net Gain is not referenced in Table.</p> <p>Water efficiency measures are not necessarily easily</p>

		<p>There is real opportunity to use the Net Gain principal to expand existing habitats, create new wildlife corridors through planting belts of woodland and hedgerows, wetland creation, expanding the buffers around riparian corridors etc. The kind of measures that might be required in order to address climate change will be needed within the development sites as well as over a much bigger scale within the whole plan area.</p> <p>We welcome that the plan supports a catchment approach to water management and using sustainable drainage. It would be good to build on this in other sections referring to the catchment based approach and Broadland Catchment Partnership highlighting catchment plans and areas identified by the partnership for habitat enhancements in accordance with paragraph 174 of the NPPF.</p> <p>We support the use of infiltration features and SuDS to reduce flood risk, but they should consider pollution risk to groundwater and surface water.' and make reference to our position statements G1 to G1 and G9-13. https://www.gov.uk/government/publications/groundwater-protection-position-statements</p> <p>The Natural Environment</p> <p>We would like to see a greater emphasis here on providing green infrastructure within developments with a specific percentage green infrastructure target. This will help reduce recreational dog walking impacts on natural habitats as well as enabling and supporting healthy lifestyles through local provision of green space for exercise and recreation with nature. The provision of green infrastructure within developments will help to increase infiltration and reduce runoff contaminated with pollutants entering our rivers.</p>	<p>achieved as the Water Company has a duty to find water.</p> <p>Key issues table does not recognise the challenge in sourcing water for the growing population.</p> <p>Welcome catchment approach to water management and using sustainable drainage. This should be built on in other sections, and reference made to Broadland Catchment Partnership work.</p> <p>Support use of infiltration measures and SuDS to reduce floodrisk. Pollution risk should also be considered with ref to EA position statements.</p> <p>Seek greater emphasis on GI in developments,</p>
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		<p>Green Infrastructure Corridors (page 67)</p> <p>We welcome that most rivers and their tributaries have been recognised as green infrastructure/habitat corridors and support any opportunities to improve habitats within the corridors.</p> <p>However, the green lines do not reflect the mosaic of habitats within them and where there are opportunities to revert agricultural land to natural habitats to mitigate against and compensate for the impacts of development. The plan should take a more strategic approach in order to create a coherent ecological network. The plan would benefit by being taken a step further by identifying which broad habitat types will be lost by developing the land allocated in the plan and identify where the compensation habitat could be created or through what mechanism is could be created.</p>	<p>with specific percentage, to help reduce recreational impacts on habitats, increase infiltration and reduce polluting runoff.</p> <p>Welcome and Support GI corridors and habitat improvement opportunities. The corridors do not recognise mosaic of habitats. Opportunities for mitigation are not identified. Should be a more strategic approach to create coherent ecological network., and identify broad habitat types to be lost and compensatory habitats to be created.</p>
22257 Carter Jonas on behalf of Taylor Wimpey Strategic Land	Comment	<p>Policy 2: Sustainable Communities identifies a number of criteria to ensure the delivery of high quality development. Criteria 5 seeks to respect, protect and enhance landscape character.</p> <p>Land at Green Lane West, Rackheath</p>	<p>Suggested that proposed development sites at Rackheath and Costessey are acceptable in landscape</p>

		<p>A full Landscape and Visual Impact Assessment (LVIA) has been prepared for the proposed allocation at land to the west of Green Lane West in Rackheath (Ref. Policy GNLP0172) as part of the current planning application at the site. In summary, there are residential areas to the north, commercial development to the south, the Norwich Northern Distributor Road (A1270) to the west, and the proposed strategic development at North Rackheath Urban Extension would be located to the east. The site is enclosed by a dense hedgerow and hedgerow tree planting to the east. The majority of the existing vegetation within the site would be retained within the proposed development. The proposed residential areas will include landscaping and structural planting. The proposed development includes a substantial area to the east of the Norwich Northern Distributor Road for landscape enhancement and new wildlife habitats. The overall conclusion from the LVIA is that the site is a suitable location for residential development in terms of landscape and visual impacts, provided the landscape mitigation and enhancement measures are implemented. The case officer for the planning application accepted that the development would be visible in the immediate area, but concluded that the site would be well screened from long distance views and that the additional landscaping to be provided as part of the proposed development would reduce the visual impact. In addition, the case officer acknowledged the provision of open space, green infrastructure, highway access and an acoustic bund would ensure the delivery of a high quality development.</p> <p>Land off Townhouse Road, Costessey</p> <p>A draft Landscape & Visual Impact Assessment has been prepared for the land off Townhouse Road in Costessey (Ref. GNLP0284R), which is identified as an unreasonable site in the GNLP Site Assessment document for Costessey</p>	<p>terms and comply with the policy.</p> <p>Requirement for a Delivery Statement is supported, but needs to be robust. It is no substitute for having deliverable allocations in the Plan. A detailed assessment of housing delivery should be done for sites in the Plan.</p> <p>Contingency sites at Costessey are not deliverable; an alternative site is proposed as a reasonable alternative.</p>
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		<p>sites. The landscape impact was one of the reasons why the site was assessed as unreasonable. It is considered that landscape impacts can be mitigated. This site is well-related to the existing built-form in Costessey and represents a natural and logical continuation of the settlement. The majority of the existing vegetation at the site boundary will be retained within the promoted development. The promoted development will enhance the boundaries to the site, with new tree planting on the western boundary and a new woodland belt on the southern boundary, alongside green corridors, planting and areas of open space within the development. The significant green buffers and corridors are provided to mitigate the impact of new development at the site and integrate it into the landscape setting. Therefore, it is considered that the promoted development at the site would respect, protect and enhance the landscape character of the surrounding area and edge of Costessey, which is consistent with Criteria 5 of Policy 2.</p> <p>In addition, the delivery of green infrastructure and landscaping at the Green Lane West site in Rackheath and Townhouse Road site in Costessey would contribute towards Criteria 3 of Policy 2.</p> <p>Policy 2 includes a requirement for delivery statements to be prepared for developments of 100 dwellings or more, setting out a timetable for housing delivery at the site. The requirement for a delivery statement is appropriate, but the information provided in the statement needs to be robust, and a statement is no substitute for the allocation of deliverable sites in emerging GNLP. It is considered that a detailed assessment of housing delivery should be undertaken before sites are allocated for development or identified as reasonable alternatives, because discussions with developers on its own represents a limited and inadequate approach.</p> <p>A detailed assessment of housing delivery would have highlighted that the</p>	
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		proposed strategic extension contingency sites for +1,200 dwellings at land off Bawburgh Lane and New Road (Ref. GNLP0581) and land north of New Road and east of A47 (Ref. GNLP2043) cannot be delivered quickly enough to address non-delivery at allocations and commitments in Costessey in the short term. As set out in the representations to the Site Allocations document, land off Townhouse Road in Costessey (Ref. GNLP0284R) is deliverable, is controlled by a housebuilder, and should be allocated or identified as a reasonable alternative site.	
22279 Barton Willmore on behalf of Landstock Estates Ltd and Landowners Group Ltd.	Comment	<p>Point 4 seeks to make the most efficient use of land supporting densities of 25 dwellings per hectare across the plan area.</p> <p>This highlights the need to Consider the approach advocated to Village clusters, where the criteria is for sites of no more than a hectare yet delivering 15 units. This highlights the need to allocate greater quantum of land to locations such as Wymondham and larger settlements where the density can be met without impacting on local character.</p>	Village Cluster site sizes conflicts with efficient use of land / minimum density requirements. Therefore the allocations in Wymondham and larger settlements, where higher densities can be achieved, should be increased.
22333 Pegasus Group on behalf of Pigeon Investment Management Ltd.	Comment	<p>Criteria 3</p> <p>4.3 This is supported as it provides for the environmental objective of sustainable development. Pigeons site proposals at Hethersett includes new green infrastructure linkages thereby supporting the environmental objectives of Criteria 3. These linkages will provide for biodiversity enhancement and new wildlife corridors as well as providing new footpath connectivity integrating with the existing public right of way network for the benefit of both existing and new residents.</p>	<p>Green infrastructure in site at Hethersett supports criteria 3.</p> <p>Criteria 4 -Density of a site is dependent on on-site requirements. It should be changed to refer to indicative minimum net density of 25pha;</p>

	<p>Criteria 4</p> <p>4.5 The density of residential development at any site is dependent on other community infrastructure or site-specific requirements that may arise as a result of emerging GNLP planning policy. It may transpire that a site promoted to the plan can provide educational or health facilities in association with residential development. The need for highway infrastructure and sustainable drainage features to be provided at a site also should be taken into consideration. To that end the policy should be amended to state that;...the indicative minimum net density of the residential element of a site allocation should be 25 dwellings per hectare.</p> <p>4.6 The Policy identifies that these minimum density standards are indicative. This is supported as it allows for flexibility to ensure that each parcel of land is used effectively, taking account of the type of development proposed, the site context and appropriate design characteristics.</p> <p>Criteria 5</p> <p>4.7 This Criteria identifies that the strategic gap policies will be used to ensure that landscape character is protected, and the supporting text in Table 8 suggests that this is the appropriate way to do this in the absence of a Green Belt in Greater Norwich.</p> <p>4.8 It should be noted that Green Belt and the strategic gaps are not landscape designations and so the criteria does not actually fulfil the objective of the Policy. The criteria should therefore be amended to provide clarity as to whether the objective is to respect landscape characters or to provide a place-shaping tool as would be provided through the designation of Green Belt or whether both of these separate policy objectives are sought.</p>	<p>- “indicative” is supported.</p> <p>Criteria 5 – re greenbelt / strategic gaps / landscapes is unclear and does not fulfil policy objective; needs to be clarified; -Ref to site at Hethersett.</p> <p>Criteria 10 – standards on a buildings energy efficiency etc should reflect NPPF and PPG and be viable having regard to other costs on development. -What is the evidence for higher standards and why “at least 20%”?</p> <p>- Not clear what is meant by a masterplanning process; and it is suggested that this</p>
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		<p>4.9 Paragraphs 331 and 337 of the GNLP suggests that the role of the strategic gaps is to prevent coalescence which is a place-shaping rather than landscaping policy. Therefore, it appears that the strategic gaps are being used as a replacement for Green Belt given that the GNLP acknowledges in Table 8 that there are no exceptional circumstances to justify the designation of Green Belt. The role of the strategic gaps must therefore be less restrictive than that which would be provided by a Green Belt. This is especially so where, as is the case with Land off Station Road, the designated area does not make any contribution to the separation of Hethersett and Norwich.</p> <p>4.10 Even if it was appropriate to designate a proxy-Green Belt through the use of strategic gaps, paragraph 145 of the NPPF identifies that some development within a Green Belt can be appropriate and the same approach should be adopted in relation to strategic gaps. For example, where outdoor sports and outdoor recreation developments are proposed such as at Land off Burnthouse Lane, these would not be inappropriate in the Green Belt and so they would clearly not be inappropriate in a strategic gap. 4.11 However, the objective to respect landscape character is supported and this can be provided through landscape-led development at both Land off Station Road and Land off Burnthouse Lane, both of which contain generous areas of strategic landscaping and robust tree/shrub belts to ensure that these can be appropriately integrated into the surrounding landscape.</p> <p>4.12 In respect of Land off Burnthouse Lane, it should also be noted that Colney Lane, which forms the eastern boundary of this parcel, forms a clearly defined boundary with an existing planting belt (approximately 20-25m wide) running along the eastern edge of Colney Lane. The existing planting belt and Colney Lane itself provide a more appropriate boundary to the strategic gap, with the agricultural fields to the east of Colney Lane providing separation</p>	<p>goes beyond what is required in the adopted SCI's and the results of a process may not be satisfactory for a planning application.</p>
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		<p>between Hethersett and the A47 to the east (and Cringleford beyond).</p> <p>Criteria 10</p> <p>4.13 This Criteria contains the following bullet point;</p> <p>All new development will provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016);</p> <p>4.14 The Planning Practice Guidance states that;</p> <p>The National Planning Policy Framework expects local planning authorities when setting any local requirement for a buildings sustainability to do so in a way consistent with the governments zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners and will need to be based on robust and credible evidence and pay careful attention to viability. PPG Climate Change “ Paragraph: 009 Reference ID: 6-009-20150327 Last revised 27th March 2015</p> <p>4.15 PPG Paragraph: 012 Reference ID: 6-012-20190315, last revised 15th March 2019, states that Local Plans can set energy efficiency standards that exceed the energy efficiency requirements of the Building Regs, it also states that such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the code for Sustainable Homes “ which is identified as approximately 20% above current Building Regs across the build mix. The PPG also requires such policy requirements to be viable. 4.16 The Code for Sustainable Homes was withdrawn in 2015 and replaced by technical housing standards. The GNLP Reg 18 has chosen to continue to</p>	
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		<p>pursue the 20% above Building Regs approach at criteria 10 of Policy 2.</p> <p>4.17 The Alternative approaches section states that this target is a challenging but achievable requirement and that to go beyond 20% would be unviable.</p> <p>4.18 What is not clear however is the Councils evidence to require energy savings of at least 20% above Building Regs when the PPG states approximately 20% across the build mix.</p> <p>4.19 It is not clear either whether this policy requirement has been appraised across a range of site typologies in the viability appraisal and whether it has been tested in conjunction with the other policy requirements of the plan, including those of emerging Policy H5 which seeks:</p> <ul style="list-style-type: none"> i. 33% affordable housing, (except in Norwich City Centre); ii. all new housing development to meet the Governments Nationally Described Space Standards; and iii. 20% of major housing developments to provide at least 20% of homes to the Building Regulation M4(2)(1) standard or any successor. <p>4.20 Whilst the objectives behind these are supported, taken together these emerging policy requirements of the plan could prejudice the delivery of some sites within the emerging plan.</p> <p>Master planning</p> <p>4.21 Community engagement prior to submitting an application is supported.</p>	
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		<p>However, Policy 2 identifies master planning using a recognised community engagement process for schemes of more than 200 dwellings will be encouraged. It is not clear what is meant by such a master planning process and clarity would be welcomed.</p> <p>4.22 It is considered likely that such a master planning process would exceed the requirements of each of the joint authorities existing adopted Statements of Community Invo4.23 Furthermore, there is no guarantee that the masterplan outcomes of such a community engagement process will be considered appropriate or acceptable by the local authority as there is no mechanism for validating the outcomes of the process pre-submission. This could result in difficulties for all parties at the application stage should masterplan amendments be required as a result of statutory and internal local authority consultations post submission. lvement and also goes beyond the requirements of paragraphs 39 to 41 of the NPPF and the PPG (20-010).4.23 Furthermore, there is no guarantee that the masterplan outcomes of such a community engagement process will be considered appropriate or acceptable by the local authority as there is no mechanism for validating the outcomes of the process pre-submission. This could result in difficulties for all parties at the application stage should masterplan amendments be required as a result of statutory and internal local authority consultations post submission.</p>	
22370 Pegasus Group on behalf of Pigeon Investment Management Ltd.	Comment	<p>Criteria 3</p> <p>4.3 This is supported as it provides for the environmental objective of sustainable development. Pigeons site proposals at Diss includes new green infrastructure linkages thereby supporting the environmental objectives of Criteria 3. These linkages will provide for biodiversity enhancement and new wildlife corridors as well as providing new footpath connectivity integrating with the existing public right of way network for the benefit of both existing</p>	<p>Green infrastructure in site at Diss supports criteria 3.</p> <p>Criteria 4 -Density of a site is dependent on on-site requirements. It should be changed to</p>

	<p>and new residents.</p> <p>Criteria 4</p> <p>4.5 The density of residential development at any site is dependent on other community infrastructure or site-specific requirements that may arise as a result of emerging GNLPP planning policy. It may transpire that a site promoted to the plan can provide educational or health facilities in association with residential development. The need for highway infrastructure and sustainable drainage features to be provided at a site also should be taken into consideration. To that end the policy should be amended to state that; the indicative minimum net density of the residential element of a site allocation should be 25 dwellings per hectare.</p> <p>4.6 The Policy identifies that these minimum density standards are indicative. This is supported as it allows for flexibility to ensure that each parcel of land is used effectively, taking account of the type of development proposed, the site context and appropriate design characteristics.</p> <p>Criteria 10</p> <p>4.7 This Criteria contains the following bullet point;</p> <p>All new development will provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016);</p> <p>4.8 The Planning Practice Guidance states that;</p> <p>The National Planning Policy Framework expects local planning authorities when setting any local requirement for a building's sustainability to do so in a</p>	<p>refer to indicative minimum net density of 25pha; - "indicative" is supported.</p> <p>Criteria 10 – standards on a buildings energy efficiency etc should reflect NPPF and PPG and be viable having regard to other costs on development. -What is the evidence for higher standards and why "at least 20%"?</p> <p>- Not clear what is meant by a masterplanning process; and it is suggested that this goes beyond what is required in the adopted SCI's and the results of a process may not be satisfactory for a planning application.</p>
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		<p>way consistent with the governments zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability. PPG Climate Change “ Paragraph: 009 Reference ID: 6-009-20150327 Last revised 27th March 2015</p> <p>4.9 PPG Paragraph: 012 Reference ID: 6-012-20190315, last revised 15th March 2019, states that Local Plans can set energy efficiency standards that exceed the energy efficiency requirements of the Building Regs, it also states that such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the code for Sustainable Homes “ which is identified as approximately 20% above current Building Regs across the build mix. The PPG also requires such policy requirements to be viable.</p> <p>4.10 The Code for Sustainable Homes was withdrawn in 2015 and replaced by technical housing standards. The GNLP Reg 18 has chosen to continue to pursue the 20% above Building Regs approach at criteria 10 of Policy 2.</p> <p>4.11 The Alternative approaches section states that this target is a challenging but achievable requirement and that to go beyond 20% would be unviable. 4.12 What is not clear however is the Councils evidence to require energy savings of “at least 20% above Building Regs when the PPG states “approximately 20% across the build mix</p> <p>4.13 It is not clear either whether this policy requirement has been appraised across a range of site typologies in the viability appraisal and whether it has been tested in conjunction with the other policy requirements of the plan, including those of emerging Policy H5 which seeks:</p>	
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		<p>i. 33% affordable housing, (except in Norwich City Centre);</p> <p>ii. all new housing development to meet the Governments Nationally Described Space Standards; and</p> <p>iii. 20% of major housing developments to provide “at least 20% of homes to the Building Regulation M4(2)(1) standard or any successor”.</p> <p>4.14 Whilst the objectives behind these are supported, taken together these emerging policy requirements of the plan could prejudice the delivery of some sites within the emerging plan.</p> <p>Master planning</p> <p>4.15 Community engagement prior to submitting an application is supported. However, Policy 2 identifies master planning using a recognised community engagement process for schemes of more than 200 dwellings will be encouraged. It is not clear what is meant by such a master planning process and clarity would be welcomed.</p> <p>4.16 It is considered likely that such a master planning process would exceed the requirements of each of the joint authorities existing adopted Statements of Community Involvement and also goes beyond the requirements of paragraphs 39 to 41 of the NPPF and the PPG (20-010).</p> <p>Furthermore, there is no guarantee that the masterplan outcomes of such a community engagement process will be considered appropriate or acceptable by the local authority as there is no mechanism for validating the outcomes of the process pre-submission. This could result in difficulties for all</p>	
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		parties at the application stage should masterplan amendments be required as a result of statutory and internal local authority consultations post submission.	
22517 Broadland Green Party	Comment	Policy 2, Bullet point 10 states: All new development will provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016). This is an inadequate target with cities such as Bristol and London (GLA) having 35% beyond Building Regulations. Reading, for example, states All housing developments over 10 dwellings / 1000m2 to be designed to achieve zero carbon (subject to viability). Given the climate emergency the financial arguments do not stack up.	A higher reduction in energy demand should be required e.g. 35% beyond building regs or zero carbon, as done in other Plans.
22634 Bidwells on behalf of M. Scott Properties Ltd.	Comment	See comments made in relation to Question 9.	See Q9.
22676	Comment	<p>This policy is not sufficiently comprehensive. There are two areas to be addressed in addition:</p> <p>There is a need to provide a more detailed policy framework for assessing proposals for new care development.</p> <p>There is a need for major developments to contribute to outdoor recreation and connectivity. This could be through the provision of new footpaths and cycle paths to improve links between settlements and other contributions to sustainable social and community infrastructure (including electric charging points) to enhance the well-being of new and existing residents. (Refer to Paragraph 4.15 and 5.48 of the NATS Implementation Plan Update 2013. Although this evidence base is out of date.</p>	Policy needs to provide a policy framework for assessing new care development; and major developments should contribute to outdoor recreation and connectivity e.g. through footpaths, cycle paths, contributions to social infrastructure (inc electric charging points).

<p>23032 Hingham Parish Council</p> <p>See 21528</p>	<p>Comment</p>	<p>As the Council have declared a climate emergency we believe that any new housing should be as energy efficient as possible and this is beyond the present building regs it should still be required. The use of community battery schemes would be useful in taking excess power generated during the day and making it available at night. If we are going to be required to drive electric cars then there will be a need for a much enhanced grid and the large power stations could be supplemented by local generation. On a historic note Hingham did at one time have its own gas works and similar small scale electrical generation should be welcomed</p>	<p>See 21528</p>
<p>23109 Salhouse Parish Council</p>	<p>Comment</p>	<p>We comment on various aspects of Table 8 relating to Policy 2.</p> <p>Point 3, Green Infrastructure. The opening statement is: ~Developments are required to provide on-site green infrastructure appropriate to their scale and location. The three main benefits listed are biodiversity gain, promotion of active travel and the reduction of flood risk, which are key NPPF priorities.</p> <p>The NPPF is also supportive of biodiversity on a more strategic scale, and the importance of ecological networks and Nature Recovery Networks. While Green Infrastructure is useful, and can play a role in these, it clearly has limitations in a wider role across the wider countryside, and in linking high designated nature conservation sites.</p> <p>Point 5, Landscape, should recognise that valued landscapes often sit with good wildlife habitats. This is particularly the case for river valleys and the Broads. A strong message from the Environment Plan and the recommendations from the recent Landscapes Review is to make links between landscapes and wildlife, and not consider them in isolation. This is covered more fully in our response to Q21.</p> <p>Point 9, Water. In our view it needs to be recognised that SUDS is not a silver</p>	<p>NPPF supports biodiversity on a strategic scale, GI is too limited.</p> <p>Links should be made between landscape and wildlife habitats.</p> <p>SUDS are not suitable in some areas.</p> <p>High levels of growth put pressure on WWTW. Incidents should be recorded in AMRs.</p> <p>More demanding standards on water efficiency should be</p>

	<p>bullet when dealing with flood risk. Areas of low-lying land with a high water-table can present a problem in ~getting the water way, and if it does manage to do that existing settlements can be put at risk.</p> <p>A high level of growth puts a greater pressure on the capacity of Waste Water Treatment Works, both on the discharge of effluent into river systems, and on flood risk with foul water. This will be exacerbated by under or lagging investment in WWTW. Although not the responsibility of the Greater Norwich Authorities, their Annual Monitoring Reports (AMRs) should record and monitor incidents.</p> <p>The statement in Point 9, Water - Key issues addressed by policy 2 states that: ~Government policy expects local planning authorities to adopt proactive strategies to adapt to climate change, taking into account water supply and demand considerations. It allows local plans to set a higher standard of water efficiency than the Building Regulations where evidence justifies it. For housing development, only the higher Building Regulations standard for water prescribed by Government (110 litres per person per day) can [be] applied through local plans and more demanding standards cannot be set. If the potential to set more demanding standards locally is established by the Government in the future, these will be applied in Greater Norwich. The closing note at the bottom of the wording states: ~Implementation of the standards for water efficiency will be supported by an updated advice note.</p> <p>We comment that it is imperative that Per Capita Consumption (PCC) of water is further reduced below the Government's prescribed 110 litres per person per day in order to deliver the statement made in Section 3, paragraph 129 which states: Greater efficiency in water and energy usage will have minimised the need for new infrastructure, and further reductions in carbon emissions will be delivered through the increased use of</p>	<p>applied, particularly given the high levels of growth.</p>
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		<p>sustainable local energy sources. New water efficient buildings will have also contributed to the protection of our water resources and water quality, helping to ensure the protection of our rivers, the Broads and our other wetland habitats. East Anglia is the driest region of the UK, our aquifers, rivers and wetlands are already at breaking point, as are many of the regions farmers who are seeing their abstraction licences reduced or revoked. If more demanding standards to reduce PPC water consumption are not set as part of the local plan, this will further adversely impact upon the environment, impacting upon the Broads and wetlands, which in turn will impact the regions aspirational growth for tourism and will severely impact the regional agricultural economy.</p> <p>These pressures are further evidence as to why the amount of new housing should be tightly controlled.</p>	
23149 Natural England	Comment	<p>We warmly welcome and support this policy.</p> <p>Under (3) we consider the provision of accessible GI for recreational uses should be included within the policy. This is necessary to help mitigate the impacts of additional recreational pressure from new housing development on designated sites.</p> <p>Under (9) we endorse the adoption of the higher standard for water efficiency under the Building Regulations, which is also supported by evidence in the WCS. Reference to retrofitting existing buildings with water efficiency measures has also been as identified as essential in the WCS in terms of managing water demand. We suggest it would be appropriate to include some wording in this policy which recognises this need, and supports its implementation should Government adopt this approach in future.</p>	<p>Under point 3 include provision of accessible GI for recreational uses.</p> <p>Under point 9 endorse adoption of higher water efficiency standards. The need for retrofitting of existing buildings should be referred to and supported should govt policy adopt this approach .</p>

<p>23168 Pegasus Group on behalf of Pigeon Investment Management Ltd.</p>	<p>Comment</p>	<p>Criteria 3</p> <p>4.3 This is supported as it provides for the environmental objective of sustainable development. Pigeons site proposals at Reepham includes new green infrastructure linkages thereby supporting the environmental objectives of Criteria 3. These linkages will provide for biodiversity enhancement and new wildlife corridors as well as providing new footpath connectivity integrating with the existing public right of way network for the benefit of both existing and new residents.</p> <p>Criteria 4</p> <p>4.5 The density of residential development at any site is dependent on other community infrastructure or site-specific requirements that may arise as a result of emerging GNLP planning policy. It may transpire that a site promoted to the plan can provide educational or health facilities in association with residential development. The need for highway infrastructure and sustainable drainage features to be provided at a site also should be taken into consideration. To that end the policy should be amended to state that;</p> <p>..the indicative minimum net density of the residential element of a site allocation should be 25 dwellings per hectare.</p> <p>4.6 The Policy identifies that these minimum density standards are indicative. This is supported as it allows for flexibility to ensure that each parcel of land is used effectively, taking account of the type of development proposed, the site context and appropriate design characteristics.</p> <p>Criteria 10</p>	<p>Green infrastructure in site at Reepham supports criteria 3.</p> <p>Criteria 4 -Density of a site is dependent on on-site requirements. It should be changed to refer to indicative minimum net density of 25pha; - “indicative” is supported.</p> <p>Criteria 10 – standards on a buildings energy efficiency etc should reflect NPPF and PPG and be viable having regard to other costs on development. -What is the evidence for higher standards and why “at least 20%”?</p> <p>- Not clear what is meant by a masterplanning process; and it is</p>
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		<p>4.7 This Criteria contains the following bullet point;</p> <p>All new development will provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016);</p> <p>4.8 The Planning Practice Guidance states that;</p> <p>The National Planning Policy Framework expects local planning authorities when setting any local requirement for a buildings sustainability to do so in a way consistent with the governments zero carbon buildings policy and adopt nationally described standards. Local requirements should form part of a Local Plan following engagement with appropriate partners, and will need to be based on robust and credible evidence and pay careful attention to viability. PPG Climate Change Paragraph: 009 Reference ID: 6-009-20150327 Last revised 27th March 2015</p> <p>4.9 PPG Paragraph: 012 Reference ID: 6-012-20190315, last revised 15th March 2019, states that Local Plans can set energy efficiency standards that exceed the energy efficiency requirements of the Building Regs, it also states that such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the code for Sustainable Homes which is identified as approximately 20% above current Building Regs across the build mix. The PPG also requires such policy requirements to be viable.</p> <p>4.10 The Code for Sustainable Homes was withdrawn in 2015 and replaced by technical housing standards. The GNLP Reg 18 has chosen to continue to pursue the 20% above Building Regs approach at criteria 10 of Policy 2.</p>	<p>suggested that this goes beyond what is required in the adopted SCI's and the results of a process may not be satisfactory for a planning application.</p>
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	<p>4.11 The Alternative approaches section states that this target is a challenging but achievable requirement and that to go beyond 20% would be unviable.</p> <p>4.12 What is not clear however is the Councils evidence to require energy savings of at least 20% above Building Regs when the PPG states ~approximately 20% across the build mix.</p> <p>4.13 It is not clear either whether this policy requirement has been appraised across a range of site typologies in the viability appraisal and whether it has been tested in conjunction with the other policy requirements of the plan, including those of emerging Policy H5 which seeks:</p> <ul style="list-style-type: none"> i. 33% affordable housing, (except in Norwich City Centre); ii. all new housing development to meet the Governments Nationally Described Space Standards; and iii. 20% of major housing developments to provide at least 20% of homes to the Building Regulation M4(2)(1) standard or any successor. <p>4.14 Whilst the objectives behind these are supported, taken together these emerging policy requirements of the plan could prejudice the delivery of some sites within the emerging plan.</p> <p>Master planning</p> <p>4.15 Community engagement prior to submitting an application is supported. However, Policy 2 identifies master planning using a recognised community engagement process for schemes of more than 200 dwellings will be</p>	
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		<p>encouraged. It is not clear what is meant by such a master planning process and clarity would be welcomed.</p> <p>4.16 It is considered likely that such a master planning process would exceed the requirements of each of the joint authorities existing adopted Statements of Community Involvement and also goes beyond the requirements of paragraphs 39 to 41 of the NPPF and the PPG (20-010).</p> <p>4.17 Furthermore, there is no guarantee that the masterplan outcomes of such a community engagement process will be considered appropriate or acceptable by the local authority as there is no mechanism for validating the outcomes of the process pre-submission. This could result in difficulties for all parties at the</p> <p>application stage should masterplan amendments be required as a result of statutory and internal local authority consultations post submission.</p>	
20594 Climate Friendly Policy and Planning on behalf of Norwich Green Party	Object	<p>Policy 2: Energy section</p> <p>26 EIS, Table 1, page 5. This essentially showed the lights going to go off in most of Norwich with the planned developments and without any intervention. This risk to the existing network is an argument for a much more creative, visionary approach to energy which would facilitate significant carbon reduction too. The GNDP councils should be thinking of smart grids, much greater efficiency in housing (including retrofit insulation programs), greater on-site renewables and energy balancing and storage. The Egnida EIS document does make some good suggestions toward this (see more detailed critique), for example semi-islanded development in chapter 5.</p> <p>27 However, CONS, Page 61, Policy 2, bullet 10 (Energy policy) does not pick</p>	<p>There is a risk to the existing energy network which means a more creative approach to energy is required which would help significant carbon reduction too; e.g. smart-grids, greater efficiency, retrofitting etc. Needs to be incorporated into Policy and site assessments.</p>

		<p>up on this and embed it into policy. The statement needs to be much more pro-active. It also needs to be factored through into the site appraisals which does not appear to have be done.</p> <p>28 Further on CONS, Page 61, Policy 2, bullet 10 All new development will provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016)â€œ. This is a weak target with other areas doing better. For example, Bristol and London (GLA) have 35% beyond Building Regulations, and Reading All housing developments over 10 dwellings / 1000m2 to be designed to achieve zero carbon (subject to viability). The financial arguments against more than 20% at the top of CONS, page 63, need to be revisited.</p>	<p>Target for energy use reduction is weak, it needs to be higher as adopted elsewhere (e.g. Bristol. London Reading). The financial arguments on viability need to be revisited.</p> <p>.</p>
20618 Carter Jonas on behalf of J. Skidmore	Object	<p>Criteria 5 seeks to respect, protect and enhance landscape character, including maintaining strategic gaps and landscape setting. However, these principles have not been applied to the selection of reasonable alternative housing sites for Wymondham. As set out in the representations to the GNLP Site Allocations document, it is noted that the strategic extensions located to the north east of Wymondham, and identified as reasonable alternatives, are located within the strategic gap between Wymondham and Hethersett. This is inconsistent with Criteria 5 in terms of whether development to the north east of Wymondham would respect and protect landscape character in this location. Those strategic sites located on the north east of Wymondham should score ~red” for impacts on landscape. In contrast, the promoted development at land south of Gonville Hall Farm in Wymondham (Ref. GNLP0320) would include new areas of green infrastructure and open space to mitigate the impact on landscape character.</p> <p>Policy 2 includes a requirement for delivery statements to be prepared for developments of 100 dwellings or more, setting out a timetable for housing</p>	<p>Criteria 5 has not been correctly applied in determining “reasonable alternative” sites, sites to the north-east of Wymondham should have scored “red” because of impact on landscape character. Site GNLP0320 includes areas of GI and open space to mitigate impacts on landscape character.</p>

		<p>delivery at the site. The requirement for a delivery statement is appropriate, but the information provided in the statement needs to be robust, and a statement is no substitute for the allocation of deliverable sites in emerging GNLP. It is considered that a detailed assessment of housing delivery should be undertaken before sites are allocated for development or identified as reasonable alternatives, because discussions with developers on its own represents a limited and inadequate approach. A detailed assessment of housing delivery would have highlighted that the strategic extensions and garden villages identified as reasonable alternatives and contingencies for Wymondham are not deliverable in the short term and would not offset non-delivery at housing allocations and commitments. As set out in the representations to the Site Allocations document, land south of Gonville Hall Farm in Wymondham (Ref. GNLP0320) is deliverable and should be allocated for development or identified as a reasonable alternative.</p>	<p>The requirement for a delivery statement is appropriate, but the information in it needs to be robust and is not a substitute for assessing deliverability before allocating sites. Discussion with developers alone is inadequate. The promoted strategic extensions and garden villages are not deliverable in the short-term. Site GNLP0320 is deliverable and should be allocated.</p>
<p>20640 Carter Jonas on behalf of Noble Foods Ltd - Farms</p>	<p>Object</p>	<p>Criteria 4 seeks to make efficient use of land. However, this principle has not been applied to the selection of the preferred housing allocation in Marsham. In this case, a greenfield site at land south of Le Neve Road, Marsham (Ref. GNLP2143) is identified as a preferred housing allocation, when a site containing vacant and unused buildings/hardstanding associated with a former poultry unit at Fengate Farm, Marsham (Ref. GNLP3035) is available for development but is only identified as an unreasonable alternative. This outcome would be inconsistent with Criteria 4 of Policy 2 and would not make efficient use of land. As set out in the representations to the GNLP Site Allocations document for the Marsham sites, it is requested that land at</p>	<p>Criteria 4 has not been applied to the selection of the proposed site at Marsham. Site GNLP3035 contains vacant buildings but is identified as an unreasonable alternative. GNLP3035 is preferable to a</p>

		Fengate Farm site should be identified as a housing allocation in emerging GNLP in preference to a greenfield site.	greenfield site and should be allocated
20896 NPS Property Consultants Ltd	Object	<p>Norfolk Constabulary have the responsibility for policing and making Norfolk a safe place where people want to live, work, travel and invest in.</p> <p>Central Government place great emphasis on the role of the Police. Furthermore, National Planning Policy Framework (NPPF) gives significant weight to promoting safe communities (in section 8 of the NPPF). This is highlighted by the provision of paragraph 91, which states</p> <p>Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:</p> <p>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.</p> <p>Therefore the inclusion within criteria 1, 6 and 7 of the importance of creating safe, inclusive, resilient communities is welcomed.</p> <p>Within the policy however, specific reference should be made to require developers of major developments (of 500+ dwellings) to detail the measures that will be taken to deliver safe, resilient and inclusive communities including how they will fund the necessary infra-structure. Therefore, criteria (i) of this policy should include reference to the specific objective to create and maintain a safer community and reduce crime and disorder.</p>	<p>Norfolk Constabulary have the responsibility for policing and making Norfolk a safe place</p> <p>The inclusion within criteria 1, 6 and 7 of the importance of creating safe, inclusive, resilient communities is welcomed.</p> <p>Major developments (500+ dwellings) should include measures for safe etc communities and how the infrastructure will be funded.</p> <p>Criteria 1 should include reference to the specific objective to create and maintain a safer community and reduce crime and disorder.</p>

<p>21102 Robin Parkinson on behalf of Saving Swainsthorpe Campaign.</p> <p>Also see 21101</p>	<p>Object</p>	<p>Endorse the comments of CPRE</p>	<p>See comments of CPRE</p>
<p>21301 Lanpro Services</p>	<p>Object</p>	<p>It is our preference for a national approach to improving the environmental performance of residential developments, rather than local authorities setting their own standards. It is fundamentally inefficient to create a plurality of standards.</p>	<p>Preference for a national approach to improving the environmental performance of residential developments, rather than local authorities setting their own standards. It is fundamentally inefficient to create a plurality of standards</p>
<p>21347 Reedham Parish Council</p>	<p>Object</p>	<p>A high level of growth puts a greater pressure on the capacity of Waste Water Treatment Works, both on the discharge of effluent into river systems, and on flood risk with foul water. Reedham already has many complaints about the sewerage facilities in the village, before trying to cope with the additional housing proposed.</p>	<p>A high level of growth puts a greater pressure on the capacity of Waste Water Treatment Works, both on the discharge of effluent into river systems, and on flood risk with foul water.</p>

			Reedham already has complaints about sewerage facilities before trying to cope with additional housing.
21399 Stephen Flynn on behalf of Glavenhill Ltd.	Object	It is our preference for a national approach to improving the environmental performance of residential developments, rather than local authorities setting their own standards. It is fundamentally inefficient to create a plurality of standards.	Preference for a national approach to improving the environmental performance of residential developments, rather than local authorities setting their own standards. It is fundamentally inefficient to create a plurality of standards
21728 Engena	Object	Without amendment the policy is unreasonable and restrictive. Wind energy should not be an exception from the policy support. Part of Footnote 49 of the NPPF is implied but this does not need to be repeated in local policy. Wind energy developments which have the backing of the affected local community should be supported. Public opinion is consistently supportive of onshore wind (see attached). It is suggested that the final paragraph of part 10 of the policy is removed and wind is not excluded from support subject to acceptable wider impacts, as given in the penultimate paragraph of part 10.	The approach to wind energy is flawed. Public opinion is consistently supportive of onshore wind. Part 10 of the policy should be amended and wind not be excluded from support, subject to acceptable wider impacts.

21790	Object	<p>Concern about the attitude to Climate Change (141) and Renewable Energy (174) Table 8 item 10. With regard to Policies 2 & 4 the current requirement of the NPPF regarding land-based wind farms is absolutely appropriate. Land-based wind farms should only occur after consultation; where, when and if there is strong local support.</p>	<p>Concerns re attitude to climate change and renewable energy.</p> <p>Re policies 2 and 4, the NPPF requirement relating to land based wind farms is appropriate; there needs to be strong local support.</p>
22285 Savills Ltd on behalf of Hugh Crane Ltd	Object	<p>The requirement that all new development provide a 20% reduction against Part L of the 2013 Building Regulations is not supported by the evidence that the policy relies upon.</p> <p>There is no justification for the lack of any alternative approaches.</p> <p>Consideration could be given to wording which “encourages a 20% reduction against Part L of the 2013 Building Regulations”.</p>	<p>The requirement for a 20% reduction on energy use is not supported by the evidence.</p> <p>The lack of alternative Approaches is not justified.</p> <p>Consideration should be given to the policy “encouraging” a 20% reduction.</p>
22404 Norwich Green Party	Object	<p>Criteria 10: Minimise Energy Demand does not sufficiently address the role that energy plays in sustainable communities. Communities should aim for zero carbon/low carbon as much as is economically and technically feasible. The 20% reduction against Part L of the 2013 Building Regulations is not ambitious and can be increased to at least match or exceed the 40% reduction target set by London.</p>	<p>The approach in Criteria 10 is insufficient, should aim for zero / low carbon if economically / technically feasible.</p>

		<p>Ref. the statement that Proposals for free standing decentralised, renewable and/or low carbon energy networks, except for wind energy schemes, will be supported subject the acceptability of wider impacts, this needs to consider the vital importance that clean energy can play in the strategy. This would also address the concern highlighted in the Greater Norwich Energy Infrastructure Study about the lack of energy capacity. Setting an ambitious target of 2030 for zero carbon energy is feasible, with the potential for the GNLP to be a market leader. This can be achieved by various means including smart grids, use of solar PVs, community energy schemes (co-ops), heat pumps, and energy storage technologies. For energy storage, the use of electricity for batteries must also come from 100% renewable energy sources.</p>	<p>Need to consider the vital importance of clean energy; which can also address concerns on energy capacity.</p> <p>A target of zero carbon by 2030 is feasible through various measures.</p>
<p>22805 Pegasus Planning Group on behalf of Peter Rudd.</p>	<p>Object</p>	<p>There is an absence of any evidence to suggest that the 20% reduction against Part L of the 2013 Building Regulations (amended 2016) is achievable in the short to medium term. We therefore object to the current wording of this requirement and suggest that a more flexible approach be taken to this policy requirement with the wording “All new development will seek to provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016).”</p> <p>It is important that the wording of Policy 2 explicitly allows matters such as viability to be taken into account when considering the merits of particular development sites. Whilst the Council estimates that the measures to deliver a 20% reduction would cost between £2,000 and £7,000 per dwelling (which is a significant range of cost impact in itself), this additional cost could impact negatively on the delivery of sites whether other costs such as infrastructure, ground contamination, etc. were already impacting on viability. Moreover, the “alternative approaches” text suggests that anything more than a 20% reduction would be universally unviable. Given the other site-specific</p>	<p>No evidence that a 20% reduction on energy demand is achievable in short to medium term. The policy should “seek” such a reduction.</p> <p>Viability should be taken into account, including other costs. The text suggests that more than 20% reduction would be unviable, which means that requiring 20% could make sites</p>

		requirements that will also impact upon the delivery of individual sites having a requirement for a 20% reduction that is so close to rendering sites unviable is not a sound approach to securing the delivery of new homes. Therefore, as worded the Policy requirement for a 20% reduction against Part L of the 2013 Building Regulations (amended 2016) could prevent sites coming forward.	unviable when other factors are taken into account. Therefore, sites could be prevented from coming forward.
22972 Pegasus Planning Group on behalf of Barratt David Wilson Homes	Object	<p>With advances in building fabric technology our client supports the approach to increase energy efficiency for new homes rather than focussing on energy generation. Notwithstanding this, our client questions whether the 20% reduction against Part L of the 2013 Building Regulations (amended 2016) is achievable in the short to medium term. We suggest that a more flexible approach be taken to this policy requirement with the wording ~All new development will seek to provide a 20% reduction against Part L of the 2013 Building Regulations (amended 2016)."</p> <p>The wording of Policy 2 must be amended so that matters such as viability can be taken into account when considering the merits of particular development sites. Whilst the Council estimates that the measures to deliver a 20% reduction would cost between £2,000 and £7,000 per dwelling (which is a significant range of cost impact in itself), this additional cost could impact negatively on the delivery of sites whether other costs such as infrastructure, ground contamination, etc. were already impacting on viability. Moreover, the ~alternative approaches" text suggests that anything more than a 20% reduction would be universally unviable. Given the other site-specific requirements that will also impact upon the delivery of individual sites having a requirement for a 20% reduction that is so close to rendering sites unviable is not a sound approach to securing the delivery of new homes. Therefore, as worded the Policy requirement for a 20% reduction against Part L of the 2013 Building Regulations (amended 2016) could prevent sites coming forward,</p>	<p>The policy should "seek" a 20% reduction in energy demand.</p> <p>Viability should be taken into account, including other costs. The text suggests that more than 20% reduction would be unviable, which means that requiring 20% could make sites unviable when other factors are taken into account. Therefore, sites could be prevented from coming forward e.g. brownfield sites even though they may be in a sustainable location.</p>

		especially brownfield sites and sites with costs associated with remediation of land, which could be in highly sustainable urban locations.	
21199 Bidwells on behalf of Hopkins Homes, Persimmon Homes and Taylor Wimpey.	Support	This policy approach is supported, and accords with the NPPF.	Support for the policy approach, it accords with the NPPF
21739 Brown & Co.	Support	<p>We support the requirements of the policy as proposed, it would be a missed opportunity if these were to be diluted. In order to meet the objectives and vision of this Plan, and to meet the national target of being carbon neutral by 2050 it is essential that all future development should deliver all elements, it is not considered that there should be any justification for this not being the norm.</p> <p>We would support more demanding standards, in particular in relation to water consumption and energy efficiency, should Government change its policy approach.</p>	<p>Support for the policy approach; it is essential to meet Plan objectives and national target of being carbon neutral by 2050.</p> <p>Support more demanding standards particularly for water consumption and energy efficiency if Govt. policy should change.</p>
21740 Brown & Co On behalf of Honingham Thorpe new settlement proposal	Support	We support the requirements of the policy as proposed, it would be a missed opportunity if these were to be diluted. In order to meet the objectives and vision of this Plan, and to meet the national target of being carbon neutral by 2050 it is essential that all future development should deliver all elements, it is not considered that there should be any justification for this not being the norm.	<p>Support for the policy approach; it is essential to meet Plan objectives and national target of being carbon neutral by 2050.</p> <p>Support more demanding standards</p>

		<p>Support more demanding standards, in particular in relation to water consumption and energy efficiency, should Government change its policy approach</p> <p>The proposed new settlement at Honingham Thorpe accords with the approach.</p>	<p>particularly for water consumption and energy efficiency if Govt. policy should change.</p> <p>Settlement proposed at Honingham Thorpe accords with the policy.</p>
22036 East Suffolk Council	Support	<p>Issue No.2 in Table 8 would benefit from more specific and detailed information to facilitate electric and low-emission vehicles and their ancillary infrastructure needs. Developers should be encouraged to provide electric charging points for dwellings with on-plot parking spaces, and to provide ducting and electricity supply to communal and public parking spaces to enable future installation of charging points. This would complement policies for East Suffolk (contained in the adopted Waveney Local Plan and the emerging Suffolk Coastal Local Plan) on facilities for electric charging points, by enhancing provision in the wider network.</p> <p>A Housing Design Audit for England by Place Alliance (see http://placealliance.org.uk/research/national-housing-audit/) found that lower building densities on projects away from the urban core scored poorly in design and there were clear benefits to designing at higher densities with the best schemes averaging 56 dwellings per hectare. This research may be of interest regarding the minimum densities specified in point 4 of the policy.</p> <p>The Royal Town Planning Institute has produced detailed guidance on how developments can be designed to support people with dementia by creating familiar, legible, distinctive, accessible, comfortable and safe environments. The application of dementia friendly design principles is considered to result</p>	<p>Support the approach overall.</p> <p>More information and encouragement of infrastructure for electric / low emission vehicles is sought (e.g. as in Waveney and Suffolk Coastal Plans).</p> <p>Research by Place Alliance may be of interest re minimum housing densities.</p> <p>Reference could be made to dementia friendly design principles (RTPI guidance may be useful</p>

		<p>in a higher quality environment for all users. Considering the aging population in the Greater Norwich area, and the surrounding area, and rise in dementia, it is advisable to incorporate dementia friendly design principle where appropriate, especially in larger housing developments. (See https://www.rtpi.org.uk/media/1312/dementiatownplanning-practiceadvice2017.pdf) Issue No.7 in Table 8 would benefit from specifically referencing dementia friendly design principles. This would complement the policies in the adopted Waveney Local Plan and the emerging Suffolk Coastal Local Plan.</p> <p>Overall, we support the approach of the sustainable communities policy and requirement for a sustainability statement.</p>	for designing dementia friendly developments)..
22246 Suffolk County Council	Support	<p>The reference to a “catchment” approach to water management is recognised and supported. With a catchment strategy, neighbouring counties should be considered too. Watercourses and rivers reflect the properties of a catchment, rather than aligning with administrative county boundaries, posing cross boundary issues. Changes to the normal hydraulic regime, specifically fluvial and pluvial flooding as a result of growth should be accounted for on a cross-boundary scale. Both the River Waveney and Great Ouse run through Suffolk, thus cross boundary changes to water storage, flow and sedimentation could arise and should be taken into account.</p> <p>Cross-boundary approach to storage and flood risk are particularly relevant strategic matters. Site specific mitigation may, however, be associated with green field run-off rates.</p>	Support water catchment approach in the policy. Water issues are often of strategic scale and so a cross-boundary approach should be applied.
22882 Bidwells on behalf of site GNLP0125	Support	<p>Support, with comments.</p> <p>As detailed in relation to Question 18, whilst the requirement to ensure the efficient use of land by, amongst other things, providing an indicative minimum density of 25 dwellings per hectare, is supported, the policy, or</p>	Ensuring efficient use of land is supported, including by minimum densities, but as well as on site characteristics

		supporting text should make it clear that, as well as giving consideration to on site characteristics, consideration will be given to a range of other site / scheme specific issues, such as housing mix, design considerations and the densities of the surrounding area.	consideration should be given to other factors e.g. housing mix, design considerations and densities of surrounding area.
23022 Bidwells on behalf of site GNLPO520	Support	Support, with comments. As detailed in relation to Question 18, whilst the requirement to ensure the efficient use of land by, amongst other things, providing an indicative minimum density of 25 dwellings per hectare, is supported, the policy, or supporting text should make it clear that, as well as giving consideration to on site characteristics, consideration will be given to a range of other site / scheme specific issues, such as housing mix, design considerations and the densities of the surrounding area.	Ensuring efficient use of land is supported, including by minimum densities, but as well as on site characteristics consideration should be given to other factors e.g. housing mix, design considerations and densities of surrounding area
23138 Bidwells on behalf of Hopkins Homes	Support	Whilst the requirement to ensure the efficient use of land by, amongst other things, providing an indicative minimum density of 25 dwellings per hectare, is supported, the policy, or supporting text should make it clear that, as well as giving consideration to on site characteristics, consideration will be given to a range of other site / scheme specific issues, such as housing mix and design considerations.	Ensuring efficient use of land is supported, including by minimum densities, but as well as on site characteristics consideration should be given to other factors e.g. housing mix, design considerations and

			densities of surrounding area
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QUESTION 20

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 20 - Do you support, object or have any comments relating to the built and historic environment?
TOTAL NUMBER OF REPRESENTATIONS:	19 (less 5 duplicates)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	10 Support, 4 Object, 5 Comments

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
20059	Comment	There is far too much development proposed on green field and village sites. The services have not and will not keep pace with this and the environmental impact will eventually be catastrophic. The current housing developments on the edge of the city, towns and villages is pretty awful. Insensitive to landscape and area. Note the work of Taylor & Green for the Rural & Urban District councils in the 1960s which would be a good example to follow e.g. Hopkins homes are the same wherever built, in the city or in a field.	Too much development on greenfield sites. Services cannot keep pace. Environmental impact will be catastrophic. Current housing developments on edge of settlements are awful and insensitive to landscape and the area. 1960s RUDC developments are a good example to follow, new developments are all the same.

20989	Comment	Our heritage is crucial in maintaining our identity and history Wymondham is a place in point. Too much over unsympathetic development will kill the town It should enhance the town but all it does is create separate communities as the development does not link the town with improved infrastructures cycle ways footways bus routes etc.	Heritage is crucial in maintaining identity e.g. Wymondham. Too much unsympathetic development will kill the town. It creates separate communities as it does not link the town with cycleways / footways / bus routes etc.
21535 Hingham Town Council	Comment	Hingham Town Council support the policy of environmental protection and enhancement. A community should have total confidence that if forced to accept more development that the development would be an asset to and enhance the environment. Sites should not be allocated for development when they are so clearly contrary to the policies that should be applied.	Support the Policy. If there is more development it should be an asset to and enhance the environment. Sites should not be allocated when they are contrary to policies.
22066 Norfolk Wildlife Trust	Comment	We support the reference in paragraph 186 to the likely future requirement for mandatory biodiversity net gain as a result of the Environment Bill currently being considered by Parliament. In addition to biodiversity net gain, there is a requirement to develop Nature Recovery Networks (NRNs), which will likely require further amendments to the submission plan. We highlight and direct the Council to recently published guidance by Natural England on NRNs, the Nature Networks Evidence Handbook , which highlights the important role Local Plans can play in helping deliver them successfully. We note with concern the reference to the 2017 Interim Habitats	Support reference to biodiversity net gain. Requirement to develop Nature Recovery Networks should be included (see NE document). Concern over HRA including mitigation on European Habitat sites, the target of HRA is to ensure

	<p>Regulation Assessment (HRA) in paragraph 187. It suggests the development mitigates impacts on sites protected by the Habitats Regulations. Whilst mitigation has a role in the HRA process and can be considered at the Appropriate Assessment stage, the overall target of the HRA process is to ensure that adverse effects on European Sites is avoided.</p> <p>Whilst we recognise that significant changes may need to be made to the policy wording in response to the outcome of the Environment Bill, in order to ensure that the plan objectives to protect and enhance the natural environment can be delivered, we recommend the following changes are made to the text of Policy 3:</p> <p>Policy 3, paragraph 5 ~...development should deliver biodiversity net gain wherever possible proportional to the scale of the development, as set out in the DEFRA biodiversity net gain metric". This is in order to ensure that the policy meets the plan objectives to secure net gains for wildlife and offers clear guidance to developers on the proportional contributions expected from all development, in line with the requirements of the NPPF.</p> <p>Policy 3, paragraph 7 ~All housing development is required to avoid mitigate impacts on sites protected under the Habitats Regulations Directive". We presume this refers specifically to the indirect impacts of recreational pressure from new housing on European Sites, but this is unclear in the policy text and we recommend the wording is changed to clarify the wider legal requirement applying to development that may affect European Sites. The legal need is set out in the UK Habitat Regulations, originally derived from the European Habitat Directive.</p> <p>In addition, the last sentence in the fourth paragraph is too ambiguous and risks misinterpretation of developers obligations regarding protection of</p>	<p>that adverse effects are avoided.</p> <p>Note reference to Environment Bill, but recommend changes to the policy: Para 5 – re biodiversity net gain in proportion to the scale of the development: Para 7 – re requirements under the Habitat Regulations. Para 4, last sentence – is too ambiguous, it should be expanded to refer to the requirements on development in relation to the full range of designated nature sites; with clear wording on how the environment will be protected and enhanced.</p>
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		<p>the various difference wildlife designations. We strongly recommend that this wording is expanded to highlight the requirements regarding development and legally protected European Sites, Sites of Special Scientific Interest and Ramsar sites, as well as local designations including County Wildlife Sites, Local Nature Reserves, Roadside Nature Reserves and ancient woodland. Clear policy wording should be included to demonstrate how the plan will ensure that the natural environment will be protected and enhanced.</p>	
<p>22526 Historic England</p>	<p>Comment</p>	<p>Whilst we consider many aspects of the plan to be sound we have identified issues with some of the policies and site allocations which do compromise the overall soundness of the plan.</p> <p>Under paragraph 35 of the NPPF some aspects of this Plan are unsound as they have not been positively prepared, are not justified, effective, or consistent with national policy. We have identified below some of the key areas where we find the Plan unsound and what measures are needed to make the Plan sound. In summary we highlight the following issues:</p> <p>a)Development Management Policies</p> <p>We continue to have significant concerns that the Development Management Policies for the three local authorities have not been reviewed as part of this Local Plan (although we note that there is some mention that they may be prior to EIP) for the reasons set out in Appendix A. We recommend that the Development Management Policies are reviewed and incorporated into the Regulation 19 Plan as a matter of priority.</p> <p>b)Historic Environment Policy</p>	<p>Some aspects compromise overall soundness:</p> <p>Concerned that Development Management policies have not been reviewed as part of this plan, they should be included.</p> <p>The Historic Environment policy is insufficiently detailed as would be in a Development Management policies section. The strategic policy inevitably does not have that level of detail.</p> <p>Brownfield redevelopment is broadly welcomed, but it should not harm the</p>

		<p>It is our view that there is insufficient policy detail for the historic environment. The strategic historic environment policy is currently combined with the natural environment policy (Policy 3). We would expect to see a more detailed policies for the historic environment - presumably in the development management policies section of the Plan. Such policies should cover designated heritage assets, non-designated heritage assets including Local lists, archaeology, a policy to address heritage at risk (including provision for a local heritage at risk list), historic shop fronts, historic landscape character etc. The strategic policy inevitably lacks that level of detail but without seeing the detailed policies it is hard to comment on the soundness of the Plan in the round. This further underlines the need to update the development management policies at the same time so the Plan can be read as a whole. It is difficult to see whether the historic environment will be adequately covered without seeing the updated Development Management Policies.</p> <p>c) Key principles for development of City sites</p> <p>Whilst we broadly welcome the principle of redevelopment of many brown field sites, it is clearly important that such development does not cause harm to the historic environment of City. To that end we suggest a number of key principles for development which could be incorporated into policy 7.1, section 5 namely:</p> <ul style="list-style-type: none"> ·Development should be of a scale and massing in keeping with the surrounding area; ·Development should respect and reinterpret the historic grain, street layouts, burgage plots and morphology of the City; 	<p>historic environment of the City. Key principles, for inclusion in Policy 7.1 are recommended:</p> <ul style="list-style-type: none"> ·Development should be of a scale and massing in keeping with the surrounding area; ·Development should respect and reinterpret the historic grain, street layouts, burgage plots and morphology of the City; ·Development should avoid breaking the skyline or competing with historic landmark buildings across the City; ·Development should use materials in keeping with the historic fabric of the City. <p>There should be a strategy / policy approach for tall buildings and massing.</p>
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	<p>·Development should avoid breaking the skyline or competing with historic landmark buildings across the City;</p> <p>·Development should use materials in keeping with the historic fabric of the City.</p> <p>d)Strategy for tall(er) buildings in Norwich</p> <p>In addition to these key principles, we also consider that it would be helpful to undertake a tall buildings study to provide the evidence base and contribute towards the development of an appropriate tall(er) buildings policy for the Plan. This might also consider the question of massing. We would welcome the opportunity to discuss the development of a policy approach to taller buildings in more detail with you. By developing a strategy for height and mass, this will help to secure sustainable development of high quality that protects and enhances the historic environment, character and significance of the City.</p> <p>e)Indicative Site Capacity</p> <p>We are concerned that some of the indicative capacities for site allocations may not be realistic. To that end we consider that it would be useful for you to prepare an evidence base document outlining the site capacities and the assumptions that have been made in reaching these figures, particularly for the sites in the City. This will provide a means of demonstrating whether the indicative site capacities are justified, realistic and achievable in terms of their impact upon the historic environment (and other factors). Our concerns are set out in more detail in Appendix A and B.</p> <p>f)Impact on historic environment for some site allocations</p>	<p>Some indicative site capacities are unrealistic. A document should be produced outlining the assumptions behind these, particularly for City sites.</p> <p>The site assessments are inadequate in terms of understanding and assessing the historic environment. A brief Heritage Impact Assessment should be done for all sites with a more detailed one done for certain sites.</p> <p>Some of the site allocation policies are inadequately worded in terms of the historic environment (suggestions given). Clear guidance on measures needed to protect the historic environment should be included in the policies.</p>
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		<p>parties about the nature and scale of development. The policies should be re-worded to include criteria for the protection and enhancement of the historic environment. This will provide greater protection for the historic environment and ensure clear and robust policies are in place that provide the decision maker and developers with a clear indication of expectations for the sites. Further details of our suggestions in this regard for each of the sites and a comment on site allocations in general are given in the attached table B.</p>	
<p>21400 Stephen Flynn on behalf of Glavenhill Ltd</p>	<p>Object</p>	<p>The approach to the natural environment specifically the lack of any discernible or deliverable site for a new country park, is "unsound". The requirement for open space and SANGs, including a possible country park, is identified in the interim HRA. There is an identified lack of green space in South Norfolk district.</p> <p>Before any further strategic scale growth can be planned through the GNLP, South Norfolk Council should establish a proposal for a realistic and deliverable new network of SANGs. This could be achieved in part, through the allocation and early release of a Country Park at Caistor Lane (GNLP 0485). This can be delivered at a scale and in a form that ensures its attractiveness to new visitors, thus diverting visitors away from The Broads National Park and existing Natura 2000 sites, SACs and SSSIs. Also, the set-up and long-term maintenance of this will be funded by housing delivery on the site and not be reliant on the public purse.</p>	<p>The approach to the natural environment and the lack of delivery of a new country park is unsound. The requirement for open space / SANGs, including a possible country park, is identified in the Interim HRA.</p> <p>There is an identified lack of green space in South Norfolk.</p> <p>Before more growth there should be a proposal for a deliverable network of SANGS. Site GNLP0485 at Caistor Lane can contribute to this by providing an attractive country park, that will divert visitors from sensitive designated sites,</p>

			as part of residential development (inc. costs of set-up and maintenance).
21620 Aylsham Town Council	Object	There is a lack of acknowledgement within the policy that the historic asset maybe underground rather than visible on the surface. This is also badly covered in the NPPF. This would be an opportunity to ensure discovery and then protection of unknown sites	Historic assets that are underground should be recognised in the policy, ensuring discovery and protection of unknown sites.
22533 Historic England	Object	<p>Para 177-179: We would like to see more here about the distinctive, unique heritage of the area “ what makes this special and different from elsewhere? Think about building materials, building styles, local vernacular, settlement form and pattern and so on and try to describe that here. We need to know what we have that we need to protect and enhance.</p> <p>Suggested change: Add more description about what is distinctive/unique etc. about the historic environment of the area.</p> <p>Para 179 and 180: Replace historic assets with heritage assets for the reasons set out above</p> <p>Para 182: Make the point that harm should be avoided in the first instance.</p> <p>Be careful when talking about weighing against public benefits “ there are different tests depending upon the grade of asset and the degree of harm. Suggest making reference here to the NPPF.</p> <p>Suggested Change: State that harm should be avoided in the first instance.</p> <p>Add the following to the end of the last sentence in accordance with the</p>	<p>Para 177-179 – explain more about what is distinctive about the historic environment of the area.</p> <p>Para 179/180 – replace “historic assets” with “heritage assets”.</p> <p>Para 182 – harm should be avoided in the first instance. In weighing against public benefits, there are different tests depending on the grade of asset and the degree of harm. Make reference to being in accordance with the various tests set out in the NPPF.</p>

	<p>various tests set out in the NPPF.</p> <p>Natural Environment:</p> <p>Make the link between green infrastructure and the natural environment. Landscape parks and open space often have heritage interest, and it would be helpful to highlight this. It is important not to consider multi-functional spaces only in terms of the natural environment, health and recreation. It may be helpful to make reference in the text to the role GI can have to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link GI networks into already existing green spaces in town or existing historic spaces such as church yards to improve the setting of historic buildings or historic townscape. Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term.</p> <p>Suggested Change: Add text to make the link between green infrastructure and the natural environment.</p> <p>Policy 3:</p> <p>We suggest adding the words, "in accordance with the requirements of the NPPF either after historic environment or after historic asset."</p> <p>Again change historic asset to heritage asset, the preferred term.</p> <p>Suggest separate policy for Natural Environment</p>	<p>The heritage links with GI and natural environment should be highlighted.</p> <p>GI / multi-functional spaces can also be important in enhancing / conserving the historic environment.</p> <p>Policy 3 - add "in accordance with the requirements of the NPPF" either after historic environment or after historic asset.</p> <p>Change historic asset to heritage asset, the preferred term.</p> <p>Suggest separate policy for Natural Environment</p>
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<p>23034 Hingham Parish Council</p>	<p>Object</p>	<p>Preferred option site for housing development GNLP0520 is contrary to this policy. It has been commented upon that the recent Hops development adjacent to GNLP0520 (built by the same developer) has ruined the approach to Hingham and is an eyesore. Communities should not be subject to development that instils such vehement dislike and opposition.</p> <p>With the allocation of GNLP0520 as a preferred site to be built by the same developer as the Hops, residents fear being left with a large area of development (covering both the Hops and GNLP0520) that will not be in keeping with the historic environment of the very nearby areas of Hingham. Having one development of a distinctive style already been built, it does not mean that it is right for the settlement to be further developed by adding more of the same. In particular if its style and design is likely to be opposed and resented by residents of the town.</p>	<p>Preferred option site for housing development GNLP0520 is contrary to this policy. Adjacent site that has been developed has ruined the approach to Hingham. The two sites together will create a large developed area that is not in keeping with nearby historic environment. Because there is one development of a distinctive style does not mean that more should be added, particularly if the design / style is not liked by residents.</p>
<p>21743 Brown & Co on behalf of proposal at Honingham Thorpe</p>	<p>Support</p>	<p>We support the approach to the built and historic environment.</p> <p>The proposed new settlement Honingham Thorpe would respect the built and historic environment of the local area, avoiding coalescence with the existing surrounding villages whilst providing opportunities for their enhancement. Technical surveys already carried out have concluded that the proposed development would not have a significant adverse impact upon the local built and heritage environment. Additional technical work</p>	<p>Support the approach to the built and historic environment.</p> <p>The proposed new settlement Honingham Thorpe would respect the built and historic</p>

		will be undertaken, and future plans would seek to respect local features including Saint Peters Church at Easton and St Andrews Church to the north of the A47.	environment of the local area, avoiding coalescence with the existing surrounding villages whilst providing opportunities for their enhancement
21945 Bidwells on behalf of UEA Estates & Buildings	Support	<p>The UEA are supportive of the strategy to ensure that development proposals conserve and enhance the built, historic and natural environment.</p> <p>As outlined within the Representations for GNLP0133-B, GNLP0133-C, GNLP0133-D, and GNLP0133-E, Historic England consulted on the potential designation of the landscape surrounding the UEA as Historic Parkland (Case: 1466188). Notwithstanding this, regardless of whether the landscape is designated as Historic Parkland, development on each site will be designed in a manner to respect the visual setting of the UEA, whilst facilitating the growth and expansion of the UEA.</p>	<p>Support the policy.</p> <p>Landscape at UEA is being considered for designation as historic parkland. Sites GNLP0133-B, GNLP0133-C, GNLP0133-D, and GNLP0133-E will be developed to respect this whilst facilitating growth of UEA.</p>
22037 East Suffolk Council	Support	We support the approach to the built and historic environment as it is in accordance with the NPPF.	Support the policy as in accordance with NPPF.
22532 Historic England	Support	Para 176: We welcome this paragraph including brief mention of heritage at risk.	Para 176 welcomed.
22908 Bidwells on behalf of UEA. Also see 21945	Support	See 21945	See 21945.
22939	Support	See 21945	See 21945

Bidwells on behalf of UEA. Also see 21945			
22959 Bidwells on behalf of UEA. Also see 21945	Support	See 21945	See 21945
22994 Bidwells on behalf of UEA. Also see 21945	Support	See 21945	See 21945
23033 Hingham Town Council Also see 21535	Support	Support the policy of environmental protection and enhancement. A community should have total confidence that if forced to accept more development , that the development would be an asset to and enhance the environment.	Support the policy. Development should be an asset to and enhance the environment.
23139 Bidwells on behalf of Hopkins Homes	Support	Support the policy	Support the policy

QUESTION 21

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 21 - Do you support, object or have any comments relating to the approach to the natural environment?
TOTAL NUMBER OF REPRESENTATIONS:	38 (5 duplicates)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	12 Support, 9 Object, 17 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
19828	Comment	The Green Infrastructure corridors clearly omit the Tud River Valley. The document makes no mention of the requirements for a corridor to be included. By implication corridors that are not included will not be protected. This seems unreasonable and the situation should be addressed.	GI corridors omit Tud River Valley and no mention is made of a corridor to be included. Implicitly corridors not included will not be protected; this is unreasonable and should be addressed.
19861	Comment	The Yare valley is a key natural resource for the residents of Norwich and a vital green corridor. It has important recreational and biodiversity value. Allowing building on this and immediately neighbouring land would be a great loss to the landscape, any effort to tackle the challenge of climate change and the green spaces of Norwich.	The Yare valley is a key natural resource and vital green corridor with important recreational and biodiversity value.

			Development on or adjacent this would be detrimental to landscape, efforts to tackle climate change and Norwich's green spaces.
20058	Comment	The environmental proposals cannot be taken seriously when the green space of the former Hellesdon Golf Course will be concreted over with 1000 houses. Neither are the proposals to build on land within the area of Thorpe Woods & the travesty that is the NDR - £60 million overspend & the destruction of flora and the failed tree planting. To think that that there are proposals for a Western Link and the some destructive mode is beyond belief.	The environmental proposals cannot be taken seriously given the development that is happening e.g. at Hellesdon golf-course, Thorpe Woods, and proposals for a Western Link Road.
20619 Carter Jonas on behalf of J. Skidmore.	Comment	National guidance expects planning decisions to contribute towards and enhance the natural environment, and to secure measurable net gains for biodiversity see Paragraphs 170 and 174 of the NPPF. It should be acknowledged that development can deliver ecological enhancements and net biodiversity gains. The promoted development at land south of Gonville Hall would include ecological enhancements.	The NPPF (paras 170/174) expects planning decisions to contribute to and enhance the natural environment and secure net gains for biodiversity. It should be acknowledged that this can be delivered by development. The proposed development south of Gonville Hall includes ecological enhancements.
20641	Comment	National guidance expects planning decisions to contribute towards and enhance the natural environment, and to secure measurable net gains for	The NPPF (paras 170/174) expects planning

Carter Jonas on behalf of Noble Foods Ltd - Farms		biodiversity see Paragraphs 170 and 174 of the NPPF. It should be acknowledged that development can deliver ecological enhancements and net biodiversity gains. The promoted development at land at Fengate Farm in Marsham would include ecological enhancements.	decisions to contribute to and enhance the natural environment and secure net gains for biodiversity. It should be acknowledged that this can be delivered by development. The proposed development at Fengate Farm Marsham includes ecological enhancements.
20674 CPRE Norfolk	Comment	<p>CPRE Norfolk supports further development of a multi-functional green infrastructure network. However, we have major concerns about how biodiversity net gain will be evaluated, assessed and measured, although it is recognised that at this point it is unclear as to what the legal requirements of this policy will be given the current progress of the Environment Bill.</p> <p>Paragraphs 183 and 184 talk about the great weight placed on protecting the natural environment in Greater Norwich, but then there are no clear details on how this will be achieved. Provision of a Green Belt on a ~green wedges model would go some way to addressing this.</p> <p>This draft Plan takes a very narrow view on the NPPF and 25-Year Plan on policies for the natural environment, namely that strategy, aims and policies are restricted to considering only gain as seen through the prism of development. There is a duty to cooperate between Councils, and that should automatically happen. While implementation may be less direct, there should be a wider strategic vision that does support policies of the NNPF. CPRE Norfolk has a proposal for a Nature Recovery Network from</p>	<p>Support for a multi-functional green infrastructure network, but concerns over how biodiversity net gain will be assessed.</p> <p>Para 183/184 refer to protecting the natural environment, but no clear details on how it will be achieved. A greenbelt / green wedge would help address this.</p> <p>The Plan takes a narrow view on the natural environment, considering only in relation to</p>

		the North Norfolk Coast to the east coast (including parts of the Broadland DC area), by the enhancement of the ecological network provided by our river systems, and supported by the environmental land management scheme. This includes a detailed planning and land management document for landscapes and wildlife relating to a Nature Recovery Network, which also include an AONB extension to the Norfolk Coast AONB into the full catchments of the twin North Norfolk rivers Glaven and Stiffkey. This could be added to Policy 3 as a means by which there would be further protection and enhancement of the Natural Environment.	development. The Duty to Cooperate between Councils applies and there should be a wider strategic vision. The Policy could refer to the CPRE proposed Nature Recovery Network for North/East Norfolk including parts of Broadland district.
20748 Hempnall Parish Council	Comment	Paragraphs 183 and 184 talk about the great weight placed on protecting the natural environment in Greater Norwich, but then there are no clear details on how this will be achieved. Provision of a Green Belt would go some way to addressing this.	There are no clear details on how protecting the natural environment will be achieved. A Green-belt would help to achieve this.
20973	Comment	It is good to see good quality agricultural land as being one of the areas for active protection. It hasn't been upheld with Growth Triangle Planning. Clause 183 actually asks for development to result in biodiversity net gain, but it's not a Policy Requirement and should be. Delete the phrase "wherever possible" As for "SANGS", that is a disgraceful option to have in place. So far environmental considerations have singularly failed to carry equal weight to economics or vanity projects like the Western Link Road (not yet consented or applied for) which is an environmental catastrophe in the making.	Support the protection of good quality agricultural land, though this hasn't been done in the growth triangle. Biodiversity net gain should be a policy requirement. SANGS are a disgraceful option.

			Environmental considerations have not carried equal weight to economics or projects like the Western Link Road.
21264 Anglian Water Services Ltd.	Comment	<p>Anglian Water is generally supportive of the principle of development proposals providing biodiversity net gain. The policy as drafted says this would apply to development wherever feasible. However the Environment Bill which is currently before parliament refers to biodiversity net gain being mandatory for all development requiring planning permission.</p> <p>Policy 3 should be amended for consistency with the provisions of Environment Bill.</p>	<p>Supports principle of development providing biodiversity net gain.</p> <p>The Environment Bill refers to biodiversity net gain being mandatory for all development requiring planning permission, not to “development wherever feasible”. The Policy should be amended to be consistent with the Bill.</p>
21543 Hingham Town Council	Comment	Sites should not be allocated for development when they are so clearly contrary to the policies that should be applied and would permanently destroy the natural environment and have a detrimental impact on landscape	Sites that are clearly contrary to policy and would damage the natural environment and landscape should not be allocated for development.
21766 RSPB (East of England Regional Office)	Comment	More detail is needed to demonstrate net gain and to ensure a robust in-combination assessment is undertaken in the HRA.	More detail is needed to demonstrate net gain and to ensure a robust in-

			combination assessment is undertaken in the HRA.
21851 Hempnall Parish Council Also see 20748	Comment	See 20748	See 20748
22187 Environment Agency (Eastern Region)	Comment	<p>This policy contains a statement which states development should deliver biodiversity net gain wherever possible. Once the Environment Act has become legislation, this statement must be strengthened.</p> <p>The policy around the natural environment must be clarified as it seems muddled. There should be separate statements for accessible green space (which could be integrated with biodiversity enhancements) and natural habitats (whose conservation value may be compromised by full public access). Overall, the importance of the natural environment in its own right needs to be recognised.</p> <p>Paragraph 197 states that the Environment Bill is currently being considered in parliament. However, government policy has now made net gain mandatory and this should therefore be updated within the plan.</p> <p>In regards to paragraph 191 - The creation of Country Parks on areas already identified as priority habitat under the NERC (for example Bawburgh lakes and Horsford) could bring both negative and positive impacts on these habitats. Sensitive management could benefit some species, however the impacts of increased visitor pressure, disturbance from dogs and so on, will have to be carefully assessed to ensure that there is no deterioration in the quality of these habitats.</p>	<p>The reference to biodiversity net gain should be strengthened when Environment Act is in place.</p> <p>The policy re natural environment should be clarified, e.g. separate statements for accessible greenspace perhaps inc biodiversity enhancements and natural habitats (that may be damaged by public access).</p> <p>The importance of the natural environment in its own right should be recognised.</p>

		<p>We would encourage the plan to incorporate new areas that are currently of limited value to wildlife (agricultural land) and create new habitats and parks in these locations. These areas could be strategically planned to increase the connectivity of existing habitats. On suitable agricultural land, the creation of new parks would bring immediate unquestionable net gain and could improve habitat connectivity as well as improving the green infrastructure network.</p> <p>It is disappointing that the does not include any reference to environmental legislation. There needs to be reference in this section to WFD (outlining key objectives, no deterioration & improvement in waterbody status) and habitats directive which is particularly important to this district. For the policy itself, we suggest adding the following text: "...Key elements of the natural environment include valued landscapes, biodiversity including priority habitats, networks and species, geodiversity, a high quality and plentiful water environment, high quality agricultural land and soils."</p> <p>The policy should also include a paragraph around encouraging redevelopment of brownfield sites, with appropriate risk assessment to protect the water environment. This policy discusses "enhances" but again does not reference WFD which is a key piece of legislation supporting and setting specific targets for enhancement. This needs amending.</p>	<p>Para 197 ref to Environment Bill and biodiversity net gain is out-of-date as Govt policy has now made net gain mandatory.</p> <p>Para 191 – the creation of country parks on priority habitats can have negative impacts as well as positive ones, so will have to be carefully managed.</p> <p>Encourage the creation of parks and habitats in areas that are currently of limited wildlife value e.g. agricultural land.</p> <p>There needs to be reference to environmental legislation e.g. WFD and its key objectives.</p> <p>Suggest amended policy wording: "...Key elements of the natural environment include</p>
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			<p>valued landscapes, biodiversity including priority habitats, networks and species, geodiversity, a high quality and plentiful water environment, high quality agricultural land and soils."</p> <p>Should include a paragraph encouraging redevelopment of brownfield sites, with appropriate risk assessment to protect the water environment.</p> <p>This policy refers to "enhances" but does not reference WFD a key piece of legislation supporting and setting specific targets for enhancement.</p>
<p>22258 Carter Jonas on behalf of Taylor Wimpey Strategic Land.</p>	<p>Comment</p>	<p>National guidance expects planning decisions to contribute towards and enhance the natural environment, and to secure measurable net gains for biodiversity (see Paragraphs 170 and 174 of the NPPF). Development can deliver ecological enhancements and net biodiversity gains.</p> <p>The proposed allocation at Green Lane West in Rackheath would include ecological enhancements. (Further info supplied).</p>	<p>National guidance expects planning decisions to contribute towards and enhance the natural environment, and to secure measurable net gains for biodiversity (see</p>

		<p>The promoted development at Townhouse Road in Costessey would include ecological enhancements. (Further info supplied).</p>	<p>Paragraphs 170 and 174 of the NPPF). Development can deliver ecological enhancements and net biodiversity gains.</p> <p>The proposed allocation at Green Lane West in Rackheath would include ecological enhancements. (Further info supplied).</p> <p>The promoted development at Townhouse Road in Costessey would include ecological enhancements. (Further info supplied).</p>
<p>22458 Gladman Developments</p>	<p>Comment</p>	<p>Concerns with the proposed approach taken by Policy 3 towards development.</p> <p>The proposals within Green Infrastructure Corridors illustrated in Map 8 represent a high-level assessment of Green Infrastructure across the County with limited regard to more detailed site data and functionality. For example, Gladmans land interest at Long Lane, Costessey is shown to be within a GI Corridor. Despite this designation, there have been planning applications approved within the identified GI Corridors, including the land to the north of the Site at Lodge Farm.</p>	<p>Concerns with approach to development.</p> <p>The GI Corridors in Map 8 are “high level” and not a detailed assessment. Development has been allowed in GI Corridors (ref to site at Costessey). Therefore, it is unclear what the policy seeks to protect.</p>

		<p>Taking this into account, it is unclear on what basis Policy 3 seeks to protect the GI</p> <p>Corridors in Map 8 given that in some cases evidence of these corridors on the ground is limited. Gladman considers that the focus of Policy 3 in relation to GI should be to secure environmental benefits at the planning application stage to enhance the quality and extent of the corridors with the aim of securing the functionality and extent of the GI corridors in the longer term. In this sense, contributions towards GI corridors made by development proposals in the area should be considered a planning benefit.</p> <p>Should wording on protection of GI corridors be retained in the policy, Gladman considers that further evidence is needed to set out what elements of the GI corridors need to be protected and for what reason. It should also be set to a greater level of detail what is meant by the term effective management of development in accordance with the policies of the development plan. Gladman would be resistant to a policy approach which would refuse development affecting a Green Infrastructure corridor where evidence shows limited environmental site value and/or the proposed development could lead to enhancements in GI.</p>	<p>The focus should be on securing environmental benefits to GI to enhance their quality, functionality and extent in the longer term. Therefore, contributions to GI by development should be considered a planning benefit.</p> <p>If the wording on “protection” of GI corridors is retained evidence is needed on what elements need to be protected and why. Also, what is meant by “effective management of development in accordance with the policies of the development plan”.</p> <p>An approach of refusing development that affects a GI corridor that is of limited environmental site value, and/or where</p>
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			development could provide enhancements, will be resisted.
22464 Gladman Developments	Comment	<p>Concerns with the proposed approach taken by Policy 3 towards development.</p> <p>The proposals within Green Infrastructure Corridors illustrated in Map 8 represent a high-level assessment of Green Infrastructure across the County with limited regard to more detailed site data and functionality.</p> <p>For example, Gladmans land interest at Norwich Common, Wymondham is shown to be partially included within the Green Infrastructure corridor aligning to the A11, despite the Site showing limited evidence of ecological value as shown by technical reports produced as part of the current planning application.</p> <p>Taking this into account, it is unclear on what basis Policy 3 seeks to protect the GI Corridors in Map 8 given that in some cases evidence of these corridors on the ground is limited. Gladman considers that the focus of Policy 3 in relation to GI should be to secure environmental benefits at the planning application stage to enhance the quality and extent of the corridors with the aim of securing the functionality and extent of the GI corridors in the longer term. In this sense, contributions towards GI corridors made by development proposals in the area should be considered a planning benefit.</p> <p>Should wording on protection of GI corridors be retained in the policy, Gladman considers that further evidence is needed to set out what elements of the GI corridors need to be protected and for what reason. It</p>	<p>Concerns with approach to development.</p> <p>The GI Corridors in Map 8 are “high level” and not a detailed assessment. Development has been allowed in GI Corridors (ref to site at Wymondham). Therefore, it is unclear what the policy seeks to protect.</p> <p>The focus should be on securing environmental benefits to GI to enhance their quality, functionality and extent in the longer term. Therefore, contributions to GI by development should be considered a planning benefit.</p> <p>If the wording on “protection” of GI corridors is retained</p>

		<p>should also be set to a greater level of detail what is meant by the term effective management of development in accordance with the policies of the development plan. Gladman would be resistant to a policy approach which would refuse development affecting a Green Infrastructure corridor where evidence shows limited environmental site value and/or the proposed development could lead to enhancements in GI.</p>	<p>evidence is needed on what elements need to be protected and why. Also, what is meant by “effective management of development in accordance with the policies of the development plan”.</p> <p>An approach of refusing development that affects a GI corridor that is of limited environmental site value, and/or where development could provide enhancements, will be resisted.</p>
<p>23110 Salhouse Parish Council</p>	<p>Comment</p>	<p>CPRE Norfolk supports further development of a multi-functional green infrastructure network. However, we have major concerns about how biodiversity net gain will be evaluated, assessed and measured, although it is recognised that at this point it is unclear as to what the legal requirements of this policy will be given the current progress of the Environment Bill.</p> <p>Paragraphs 183 and 184 talk about the great weight placed on protecting the natural environment in Greater Norwich, but then there are no clear details on how this will be achieved. Provision of a Green Belt on a ~green wedges model would go some way to addressing this.</p>	<p>Support for a multi-functional green infrastructure network, but concerns over how biodiversity net gain will be assessed.</p> <p>Paras 183/184 refer to protecting the natural environment, but no clear details on how it will be achieved. A greenbelt /</p>

		<p>This draft Plan takes a very narrow view on the NPPF and 25-Year Plan on policies for the natural environment, namely that strategy, aims and policies are restricted to considering only gain as seen through the prism of development. There is a duty to cooperate between Councils, and that should automatically happen. While implementation may be less direct, there should be a wider strategic vision that does support policies of the NPPF. CPRE Norfolk has a proposal for a Nature Recovery Network from the North Norfolk Coast to the east coast (including parts of the Broadland DC area), by the enhancement of the ecological network provided by our river systems, and supported by the environmental land management scheme. This includes a detailed planning and land management document for landscapes and wildlife relating to a Nature Recovery Network, which also include an AONB extension to the Norfolk Coast AONB into the full catchments of the twin North Norfolk rivers Glaven and Stiffkey. This could be added to Policy 3 as a means by which there would be further protection and enhancement of the Natural Environment.</p>	<p>green wedge would help address this.</p> <p>The Plan takes a narrow view on the natural environment, considering only in relation to development. The Duty to Cooperate between Councils applies and there should be a wider strategic vision. The Policy could refer to the CPRE proposed Nature Recovery Network for North/East Norfolk including parts of Broadland district.</p>
20223	Object	<p>Don't build the Norwich Western Link. It cuts through a Barbastelle bat super colony these are nationally rare bats. We should cherish and protect them in Norfolk. The A47 planned 'improvements' will also damage and cut through natural habitat and cause pollution. The R. Tud needs protecting this road scheme will increase dependency on cars. The two junctions planned will spoil the landscape and are not appropriate for a rural setting. Norfolk is beautiful because it doesn't have roads like this please keep it that way.</p>	<p>Don't build the Norwich Western Link. It cuts through a Barbastelle bat super colony these are nationally rare bats, and will increase dependency on cars. The River Tud needs protecting. The junctions will Spoil landscape and not appropriate in a rural</p>

			<p>setting. Keep Norfolk without such roads.</p> <p>A47 improvements will damage habitat and cause pollution.</p>
20350 Brockdish & Thorpe Abbotts Parish Council	Object	<p>We support the CPRE view that this policy is far too narrow. It is entirely reactive. The GNLP should contain pro-active measures to improve the environment and counter-act climate change. As an example the Government wants to plant millions of trees so the GNLP should take a lead on where and how this should take place and commit a budget to it.</p>	<p>Policy is too narrow. The Plan should contain pro-active measures to improve the environment and counter-act climate change, e.g. take a lead on delivering tree-planting under Govt. proposals.</p>
21304 Lanpro Services Ltd	Object	<p>The approach to the natural environment as set out in Policy 3, specifically the lack of any discernible or deliverable site for a new country park, is ~unsound</p> <p>Lanpro request that before any further strategic scale growth can be planned through the Greater Norwich Local Plan, that South Norfolk Council establish a proposal for a realistic and deliverable new network of SANGs.</p>	<p>The Policy is unsound without a country park.</p> <p>Before any further strategic growth is planned South Norfolk Council should establish a proposal for a realistic and deliverable new network of SANGs</p>
21476 Hempnall Parish Council	Object	<p>Paragraphs 183 and 184 talk about the great weight placed on protecting the natural environment in Greater Norwich, but then there are no clear details on how this will be achieved. Provision of a Green Belt would go some way to addressing this.</p>	<p>Paras 183/184 refer to protecting the natural environment, but no clear details on how it will be achieved. A greenbelt</p>

			wedge would help address this.
21680 The Woodland Trust	Object	Need for more specific policy on protection ancient woodland and ancient/veteran trees, at least as strong as that in the NPPF. Also there is a need for specific policy and/or targets on tree planting and woodland creation.	Need a policy on protecting ancient woodland and ancient / veteran trees, at least as strong as that in the NPPF. Need a policy and/or targets of tree planting and woodland creation.
21834 Natural England	Object	<p>Natural England objects to the current wording of Policy 3 and considers that the policy and supporting text are inadequate to protect, maintain, restore and enhance the natural environmental assets of the area and the benefits arising from these for residents, workers and visitors. It will not ensure the delivery of GI of sufficient quality and quantity in the right locations, nor help the Plan to meet the sustainability criteria or adapt to climate change. It contains too much uncertainty and needs to explain the hierarchies of site protection and mitigation.</p> <p>The natural environmental assets found in the Greater Norwich area, and adjoining it, provide immense benefits that deliver across all three pillars of sustainability. In terms of benefits to the economy and society alone, these would run into tens of millions of pounds if they were calculated over the lifetime of the Plan.</p> <p>We strongly recommend that Policy 3 and the supporting text are substantially amended and expanded. The 175 words assigned to the current natural environment section of Policy 3 cannot do justice to what is required for the Greater Norwich area and surroundings. Much of the</p>	<p>The Policy and supporting text are inadequate. They should be substantially amended and expanded (175 words is not enough).</p> <p>It will not ensure the delivery of adequate GI (quality, quantity, right locations) nor help the Plan to meet sustainability criteria or adapt to climate change.</p> <p>It contains too much uncertainty.</p>

		<p>wording and maps in Policy 1: Addressing climate change and protecting environmental assets in the current Joint Core Strategy (2011) remains valid and relevant. Parts of it could form the basis of a new Policy 3, which needs to cover measures in relation to climate change adaptation, halting and reversing the loss of biodiversity in relation to the Government 25 year Environment Plan and Nature Recovery Networks, biodiversity net gain, recreational disturbance, suitable alternative greenspace (SANGS) and GI networks.</p> <p>We also suggest looking at East Suffolk Councils Local Plan Final Draft and Policy SCLP 10.1: Biodiversity and Geodiversity and the supporting text in general, for the approach that we endorse (https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf).</p> <p>GI references in the Plan repeatedly refer to the strategic GI network as set out on the (basic) Map 8 and very little else. The Local Plan needs to provide a strategic document that sets out what the GI network will look like on the ground, how and where it will be delivered and the timescale, together with detailed information about the existing GI network and how it, too, will be protected, enhanced or expand. At this stage of the plan process there needs to be far more detail provided to be certain that it will be delivered, and for the HRA to be able to assess in relation to the mitigation measures that have been identified.</p> <p>Natural England, together with other partners, would very much like to work with the local authorities in revising and expanding Policy 3 to ensure it is comprehensive and robust.</p>	<p>It needs to explain the hierarchies of site protection and mitigation.</p> <p>The natural environmental assets provide immense benefits to the three pillars of sustainability e.g. multi-million pound benefits to the economy and society.</p> <p>Much of the wording and maps in the JCS remain valid and could form the basis of the Policy. It needs to cover measures in relation to climate change adaptation, halting and reversing the loss of biodiversity in relation to the Government 25 year Environment Plan and Nature Recovery Networks, biodiversity net gain, recreational disturbance, suitable alternative greenspace (SANGS) and GI networks. .Suggest East Suffolk</p>
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			<p>Council's Local Plan Final Draft Policy SCLP 10.1 and supporting text as an approach that NE endorse.</p> <p>The plan should set out what a GI network will look like on the ground, how and where it will be delivered and the timescale with other detail on existing GI network. There needs to be the detail to show that it will be delivered, and for the HRA to be able to assess in relation to identified mitigation measures.</p> <p>NE would like to work with the local authorities and partners to revise the policy.</p>
22022 Mulbarton Parish Council	Object	With the development of industrial areas in the A140, B113 and A47 triangle MPC are disappointed that there is no provision of a Green Belt on a "green wedges" model to prevent continual urban sprawl from Norwich to the rural village of Mulbarton.	There should be a Green-belt on a "green wedges" model to prevent urban sprawl from Norwich to Mulbarton.
22412 Norwich Green Party	Object	We lack confidence in GNLP's desire to protect the natural environment in light of:	Lack confidence in the Plans desire to protect the

		<ul style="list-style-type: none"> - Development of significant green open spaces in Greater Norwich e.g. Royal Norwich Golf Club for housing, Yare valley on Bluebell Road for housing, Yare valley land off Colney Lane for new Rugby club and parking, redevelopment of Blackdale school and playfields for student housing. - NDR which has severed a large area of open countryside. Post-evaluation of landscaping showed that a high percentage of trees and shrubs planted along the road have died. - GNLP policy support for extension of NDR across River Wensum Valley with its complex mosaic wetland and woodland of habitats. - GNDP Councils' support for A47 dualling, e.g. North Tuddenham to Easton dualling would adversely impact upon the Tud valley. <p>Natural green spaces are seen as an easy target for development and the city is expanding further and further outwards into open countryside. The GNLP must take seriously the Biodiversity Emergency and the need to achieve 'Net Biodiversity Gain' at every opportunity.</p>	<p>natural environment in light of developments that have happened (e.g. Royal Norwich Golf Club, NDR) and the policy support for NDR extension (Western Link Road) and Council's support for A47 dualling.</p> <p>Natural green spaces are seen as an easy target for development and the city is expanding into open countryside.</p> <p>The Biodiversity Emergency must be taken seriously and net biodiversity gain achieved at every opportunity.</p>
23035 Hingham Town Council	Object	<p>Development proposals will be required to conserve and enhance the natural environment. Key elements of the natural environment include valued landscapes. Again with specific reference to GNLP0520. Development of GNLP0520 would be contrary to Policy 3 The Natural Environment. It is clear from residents objections that the loss of such prominent and valued open landscape by developing GNLP0520 would definitely not conserve or enhance the natural environment, but permanently destroy it, on the approach to Hingham via the Norwich Road.</p>	<p>Development of Site GNLP0520 would be contrary to Policy 3.</p>

		Sites should not be allocated for development when they are so clearly contrary to the policies that should be applied.	
21105 Robin Parkinson on behalf of Saving Swainsthorpe Campaign	Support	In the CPRE submission they refer to concerns relating to how bio-diversity will be assessed evaluated and measured - whilst we broadly support the approach set out in this draft we remain concerned about how the balance between the environment and development will be assessed and who will evaluate that process.	Broadly support the approach but concerned about how the balance between the environment and development will be assessed and who will evaluate that process.
21152 Yare valley Society	Support	The Yare Valley Society strongly supports the commitment in Policy 3 to protect and enhance the Green Infrastructure Network illustrated in map 8 of which the Yare Valley Corridor is an important part. However, if Policy 3 is to be enforced and have any meaning, Site GNLP0133-E, which intrudes deeply into the existing Yare Valley Green Infrastructure Corridor should be removed from the draft GNLP Sites Plan list. Not to do so would display a blatant willingness to ignore Policy 3 from the outset.	Support policy and protection / enhancement of GI Network. Site GNLP0133E conflicts with Policy 3 as it intrudes into the Yare Valley GI Corridor and should be removed from the Plan, otherwise it will be ignoring the policy.
21744 Brown & Co on behalf of Honingham Thorpe proposed development.	Support	We support the approach to the natural environment. The proposed new settlement Honingham Thorpe is well related to the existing green infrastructure network to the west of Norwich and it is proposed to link with this and enhance it. A comprehensive multi-functional green infrastructure network would be delivered within the site and form the spine of the development.	Support the approach to the natural environment. The proposed settlement at Honingham Thorpe reflects the policy approach.

21946 Bidwells on behalf of UEA Estates & Buildings	Support	<p>The UEA are supportive of the strategy to ensure that development proposals conserve and enhance the built, historic and natural environment.</p> <p>As outlined within the Representations for GNLP0133-B, GNLP0133-C, GNLP0133-D, and GNLP0133-E, Historic England consulted on the potential designation of the landscape surrounding the UEA as Historic Parkland (Case: 1466188). Notwithstanding this, regardless of whether the landscape is designated as Historic Parkland, development on each site will be designed in a manner to respect the visual setting of the UEA, whilst facilitating the growth and expansion of the UEA.</p>	<p>Support the strategy for conserving and enhancing the environment.</p> <p>Landscape surrounding the UEA is being considered for designation as Historic Parkland. Development on sites GNLP0133B,C,D and E would be designed to respect the setting of the UEA whilst facilitating its growth.</p>
21990	Support	<p>We welcome the support of the NSPF objectives on environmental protection, landscape protection and biodiversity and the statement that development should deliver biodiversity net gain but it is short on specifics of how this will be measured.</p> <p>We welcome the commissioning of the Norfolk-wide study, the Green infrastructure and Recreational Impact Avoidance and Mitigation Strategy see comments above.</p>	<p>Support approach but needs to be more specific on how biodiversity net gain will be measured.</p> <p>Welcome commissioning of GIRAMS.</p>
21997 Redenhall with Harleston Town Council	Support	Support Policy 3 (Environmental Protection and Enhancement) and the measures detailed to conserve and enhance the natural environment including valued landscapes, biodiversity including priority habitats.	Support the policy
22729 Pegasus Group	Support	Paragraph 170 of the National Planning Policy Framework highlights the importance of protecting the natural environment, including ensuring biodiversity net gain. Policy 3 Environmental Protection and Enhancement reflects these objectives.	Policy 3 reflects the NPPF.

		<p>Our client supports this approach to the natural environment and would ensure that any scheme on the Land off Norton Road site would be brought forward with the aim of achieving net gain in biodiversity through retention, protection and enhancement of any on-site habitats, provision of new public open space and high quality landscaped areas.</p>	<p>The approach to the natural environment is supported.</p> <p>Proposed site at Norton Rd would accord with the policy.</p>
<p>22853 Crown Point Estate</p>	<p>Support</p>	<p>Paragraph 181 of the Draft Plan notes that the development of a multi-functional green infrastructure network was formalised locally through the Joint Core Strategy in 2011. It is essential that the network continues to be developed into the long-term as green infrastructure aims to link fragmented habitats, allowing the movement of species. It also has other benefits such as reducing flood risk and promoting active travel.</p> <p>Policy 3 translates this into a requirement to enhance the Green Infrastructure Network, which may include the establishment of a new country park or parks.</p> <p>We see the additional land at WCP as providing an opportunity to facilitate the required enhancements to the network where required to support development in the area, offering genuine additional space as well as the opportunity to enhance the existing space. Safeguarding the additional land for that purpose will provide confidence to those seeking to provide such space and facilities as SANGS associated with development sites, as well as those wishing to propose a variety of leisure activities in a green context.</p>	<p>Additional land at WCP provides the opportunity to enhance the GI network to support development in the area. Safeguarding the additional land for that purpose will give confidence for those seeking to provide space / SANGs etc associated with development sites, as well as leisure activities in a green context.</p>
<p>22907 Bidwells</p> <p>Also see 21946</p>	<p>Support</p>	<p>See 21946</p>	<p>See 21946</p>

22940 Bidwells Also see 21946	Support	See 21946	See 21946
22960 Bidwells Also see 21946	Support	See 21946	See 21946
22995 Bidwells Also see 21946	Support	See 21946	See 21946

QUESTION 22

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 22 - Are there any topics which have not been covered that you believe should have been?
TOTAL NUMBER OF REPRESENTATIONS:	20 (inc 3 duplicates)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 5 Object, 15 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
19862	Comment	In the current era of ecological and climate breakdown these two areas are barely mentioned and where they are not given enough status. We have a vast amount of agricultural land to utilise for development. Please do not consider valuable green spaces as short term opportunities.	Ecological and climate change breakdown are not given enough status. There is a vast amount of agricultural land to be used for development. Valuable green spaces should not be considered.
19868 Norfolk Constabulary, Designing Out Crime Officer	Comment	Support these intended plans. The safe access and movement of people through this green infra structure in particular is desired and where relevant I would request the adoption of CEPTED (Crime Prevention Through Environmental Design) based on the principles of the police initiative Secure By Design (SBD). Crime prevention	Support the plans. Safe access / movement, particularly in GI, is desired. Recommend adoption of

		<p>measures such as creating surveillance vistas to aid observations, extra lighting along designated routes/paths should benefit movement by reducing the opportunity for crime and the fear of crime to occur. National Planning Policy Framework (NPPF) section 8 gives significant weight to promoting safe communities.</p>	<p>CEPTED (Crime Prevention Through Environmental Design) based on the principles of the police initiative Secure By Design (SBD).</p> <p>Crime prevention measures in design will benefit movement, in accordance with NPPF (section 8) promotion of safe communities.</p>
<p>20244 Dickleburgh and Rushall Parish Council</p>	<p>Comment</p>	<p>Carbon offsetting and community harmony. The GNLP should make a strategic assessment of the impact of the whole GNLP process using a carbon offset calculator.. Strategies to include either all communities, those affected directly or a GNLP wide strategic approach</p> <p>There is no mention of carbon offsetting to mitigate the new homes and infrastructure, and little regarding the quality of build and future proofing. So far the GNLP appears heavily weighted toward developers and community expansion, with less regard to community harmony and the environmental impact.</p> <p>Suggest :</p> <ul style="list-style-type: none"> - Offsetting at the point of build. All planning applications for development to include a carbon assessment (tCo2e) and carbon-offset strategy. - Strategic Offsetting – a carbon assessment to be made for the whole GNLP, with mitigation for the impacts through woodland in 	<p>Carbon offsetting to be used in relation to community harmony.</p> <p>A carbon assessment and carbon-offset strategy to be undertaken for the whole GNLP and offsetting measures put in place. This will mitigate environmental impact and aid community harmony. Suggestions include carbon assessment / strategy with all planning applications; strategic offsetting through woodland provision in south Norfolk; and list of environmental measures to be done by developers in consultation with the community.</p>

		<p>South Norfolk e.g. a series of linked woodlands across the South of the county; a large public woodland managed by an organisation such as the Woodland Trust; woodlands planted in all the parishes that have new housing, managed by the Parish councils.</p> <p>- a list of environmental measures to be adopted by developers in consultation with the local community to show a positive environmental impact from development.</p>	
20749 Hempnall parish Council	Comment	Phasing of housing and a green belt for Norwich should have been included in the Draft plan.	<p>Include phasing of housing.</p> <p>Include a green-belt for Norwich</p>
21456	Comment	<p>Providing suitable alternative natural green space (SANGS) e.g. country parks is important in contributing to offset the impact of increased population on SSSI areas and protect biodiversity. Their accessibility will affect who and how people use them. If they are only accessible by private car, then they will be less used by those who are most in need of improved access to green space.</p> <p>A separate, complementary emphasis on improving the quality of small green spaces adjacent to dense population centres should be incorporated. Tools such as Greenkeeper (http://www.greenkeeperuk.co.uk/) are useful. Improving walking and cycling access, frequency of seating areas, access to toilets, and 'wildscaping' can encourage greater community use.</p>	<p>Provision of SANGS can reduce impacts on SSSI's and protect biodiversity from increased population pressures. They need to be accessible to be used by those most in need of them.</p> <p>Should also be an emphasis on improving the quality of small green spaces adjacent to dense populations (suggestions for type of improvements given).</p>
21553 Hingham Parish Council	Comment	There should be no development until the present allocations have been built however planners should give careful consideration to allowing more self-build and be willing to allow some experimental green initiative building to address climate change/the climate emergency.	No new development until existing allocations have been built.

		In the context of the climate emergency, where several species of wildlife native to Britain are becoming extinct or at risk of extinction the Council are concerned to ensure that housing developments are not built on areas where rare species of wildlife may exist, or indeed, where extension of the urban area will contribute to the depletion of wildlife.	Consideration should be given to more “self-build” homes and allowing “green” building to address climate change issues. Housing development should not contribute to depleting wildlife / important wildlife sites.
21745 Brown & Co	Comment	It is considered that additional emphasis is required regarding the protection of the landscape, with reference to landscape character assessments.	Additional emphasis is required regarding the protection of the landscape, with reference to landscape character assessments.
21767 RSPB (East of England Regional Office)	Comment	Paragraph 190 makes mention of the potential country park near the growth triangle but there is no description of the size, habitat make-up, what recreational activities might be taking place. We would encourage wider consultation and engagement with environmental organisations in the design and layout of this facility.	Para 190 refers to country park at the Growth Triangle but does not provide details. Encourage engagement with the environmental organisations in the design of the country park
21852 Hempnall Parish Council Also see 20749	Comment	Phasing of housing and a green belt for Norwich should have been included in the Draft plan.	See 20749
21992	Comment	A possible green belt for Norwich or the green wedges (or other) model, particularly bearing in mind the large degree of support it received in the earlier Stage A Regulation 18 consultation. A clear indication that certain areas of land are completely off-limits	A green-belt or green-wedge should be included; it was well supported at earlier consultation.

		<p>for large-scale development is necessary. This could then motivate housebuilders to actually build out some of their brownfield sites, since they will see that, no matter how long they wait, development in some protected rural areas outside the city will never happen. This will:</p> <p>Check the unrestricted sprawl of large built-up areas preventing neighbouring towns merging so they preserve their unique identities where they have them and don't just become dormitory towns for an expanded Norwich conurbation</p> <p>Assist in safeguarding several particularly sensitive areas of countryside that have special ecological significance, or because of their importance for the rural economy.</p>	<p>Be clear that some areas will never be developed; this will encourage the development of brownfield sites.</p> <p>Check sprawl of large built-up areas to prevent merging of neighbouring towns, preserving their identities, and so they do not become "dormitories" for Norwich.</p> <p>Safeguard areas of countryside that are particularly important for ecological significance or for the rural economy.</p>
22023 Mulbarton Parish Council	Comment	<p>The decision to remove a possible greenbelt for Norwich and the significant reduction in the capacity of Harford Park and Ride to provide a Recycling Centre will limit the possibility of people part commuting from village clusters into Norwich.</p>	<p>A green-belt for Norwich should be included.</p> <p>Reduction in capacity at Harford Park and Ride will limit part commuting from village clusters into Norwich.</p>
22413 Norwich Green Party	Comment	<p>Although the provision of new informal green open space on the periphery of Norwich is important (e.g. new country parks), nonetheless, it is essential to retain and enhance existing open space such as sports grounds and golf courses and school playing fields inside the built up area for several reasons: to provide such spaces close to where people lives and accessible on foot and by bike; to support biodiversity, to absorb rainfall, to stop over-heating of the</p>	<p>Informal green space on the periphery of Norwich is important, but it is also important and should be enhanced and protected within the built-up area.</p>

		city, to absorb air pollution and reduce carbon. We would therefore welcome a specific commitment to protection of green spaces of all types.	
22518 Broadland Green Party	Comment	<p>Cat-exclusion zones in rural and urban-fringe landscapes.</p> <p>The issue of cat-exclusion zones is a sensitive and complex issue that has not been considered in the GNLIP but is a serious aspect of retaining our natural wildlife and biodiversity. In a comprehensive study highlighting the impact of humankind it was found that whilst the human population represents just 0.01% of all living things humanity has caused the loss of 83% of all wild mammals and half of plants, while livestock and pets kept by humans abounds .</p> <p>Domestic cats (<i>Felis catus</i>) are known predators of native and introduced wildlife occurring in high densities independent of fluctuations in prey species abundance. Because domestic cats are fed by their owners, they do not need to hunt to survive, and household food buffers them from prey population declines, enabling them to hunt birds and small mammals until prey reach very low numbers. The amount of food a cat is fed does not affect its propensity to hunt. Predation pressure is probably higher, given that domestic cats often live for 15 years or more, much longer than feral cats.</p> <p>The process of urban sprawl brings the human population and their domestic cats in close contact with wildlife in areas that were previously remote, including reserves and conservation areas created to protect populations of vulnerable or threatened species. Various mitigation measures have been proposed, including devices designed to hinder cat hunting ability and regulations governing cat</p>	Domestic cats prey on wildlife. Wide cat exclusion zones should be provided in rural and urban areas around sensitive areas, and / or limit the number of cats per household.

		<p>ownership. Such regulations may aim to reduce cat densities by limiting the number of cats per household, or they may define zones around sensitive conservation areas where cat ownership is prohibited.</p> <p>How large should cat-exclusion zones have to be?</p> <p>Even though the average home-range size of domestic cats living in low-density residential areas tends to be small, large inter-cat variation in ranging behaviour means that effectively to exclude domestic cats, exclusion zones would need to be wide.</p> <p>Home ranges are larger at night than day. Sources of cover such as trees and buildings are preferred. Maximum distances moved and large variability between individual cats suggest buffers in rural landscapes would need to be at least 2.4 km wide, whereas those in urban-fringe habitat could be half as large .</p> <p>We ask that serious consideration be given to the impact of cat predation on wildlife in the vicinity of future developments.</p>	
22537 Historic England	Comment	<p>It is important that your plan is underpinned by appropriate evidence. We would recommend that the following evidence for the historic environment is used in the preparation of your Local Plan.</p> <p>Any evidence base should be proportionate. However, with a local plan we would expect to see a comprehensive and robust evidence base. Sources include:</p> <p>i, National Heritage List for England. www.historicengland.org.uk/the-list/</p>	Recommend a number of pieces of evidence on the historic environment be taken into account in the Plan (list provided).

		<p>ï, Heritage Gateway. www.heritagegateway.org.uk</p> <p>ï, Historic Environment Record.</p> <p>ï, National and local heritage at risk registers. www.historicengland.org.uk/advice/heritage-at-risk</p> <p>ï, Non-designated or locally listed heritage assets (buildings, monuments, parks and gardens, areas)</p> <p>ï, Conservation area appraisals and management plans</p> <p>ï, Historic characterisation assessments e.g. the Extensive Urban Surveys and Historic Landscape Characterisation Programme or more local documents. www.archaeologydataservice.ac.uk/archives/view/EUS/</p> <p>ï, Environmental capacity studies for historic towns and cities or for historic areas e.g. the Craven Conservation Areas Assessment Project. www.cravenc.gov.uk/CHttpHandler.ashx?id=11207&p=0</p> <p>ï, Detailed historic characterization work assessing impact of specific proposals.</p> <p>ï, Heritage Impact Assessments looking into significance and setting especially for strategic sites or sites with specific heritage impacts</p> <p>ï, Visual impact assessments.</p>	
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<p>23036 Hingham Parish Council</p> <p>Also see 21553</p>	Comment	<p>There should be no development until the present allocations have been built however planners should give careful consideration to allowing more self-build and be willing to allow some experimental green initiative building to address climate change/the climate emergency.</p> <p>In the context of the climate emergency, where several species of wildlife native to Britain are becoming extinct or at risk of extinction the Council are concerned to ensure that housing developments are not built on areas where rare species of wildlife may exist, or indeed,</p>	See 21553

		where extension of the urban area will contribute to the depletion of wildlife.	
20675 CPRE (Norfolk)	Object	The decision to remove a possible green belt for Norwich on the green wedges (or other) model from the draft Local Plan is, in the opinion of CPRE Norfolk, unjustified, particularly bearing in mind the large degree of support it received in the earlier Stage A Regulation 18 Site Proposals and Growth Options consultation.	A green-belt or green-wedge should be included; it was well supported at earlier consultation.
21479 Hempnall Parish Council Also see 20749	Object	Phasing of housing and a green belt for Norwich should have been included in the Draft plan.	See 20749
22535 Historic England	Object	<p>Omission "Heritage at Risk:</p> <p>Add a policy and paragraph on heritage at risk. There are a high number of assets on the Heritage at Risk Register in this Local Plan Area. Summarise the type of assets at risk. State what you are planning to do to address this.</p> <p>Omission Historic Landscape Characterisation:</p> <p>We suggest adding reference (policy and text) to Historic Landscape Characterisation and Landscape Character Assessments. Landscape character assessments, particularly those accommodating major developments, can be deficient in assessing the landscape value relating to scheduled monuments and their settings. The historic environment has an important role to play in understanding the landscape. Many tracks, green lanes, field boundaries and settlement patterns are remnants of past use and provide evidence</p>	<p>Add a policy / text on heritage at risk.</p> <p>Add a policy / text on Historic Landscape Characterisation and Landscape Character Assessments. LCAs can be deficient in assessing the landscape value relating to scheduled ancient monuments and their settings.</p>

		of how the landscape has evolved over time. The objective of protecting and enhancing the landscape and recognition of its links to cultural heritage can help improve how the historic environment is experienced and enjoyed.	
22536 Historic England	Object	<p>It is difficult to see whether the historic environment will be adequately covered without seeing the updated Development Management Policies. We would expect such policies to cover designated heritage assets, non-designated heritage assets including Local lists, archaeology, a policy to address heritage at risk (including provision for a local heritage at risk list), historic shop fronts, historic landscape character etc. This strategic policy inevitably lacks that level of detail but without seeing the detailed policies it is hard to comment on the soundness of the Plan in the round.</p> <p>Suggested change: Update Development Management policies to create a complete Plan.</p>	<p>It is difficult to see whether the historic environment will be adequately covered without seeing the updated Development Management Policies.</p> <p>The Development Management Policies should be updated.</p>
23111 Salhouse Parish Council	Object	The decision to remove a possible green belt for Norwich on the green wedges (or other) model from the draft Local Plan is, in the opinion of CPRE Norfolk, unjustified, particularly bearing in mind the large degree of support it received in the earlier Stage A Regulation 18 Site Proposals and Growth Options consultation.	A green-belt or green-wedge should be included; it was well supported at earlier consultation.

QUESTION 23

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 23 - Do you support, object or have any comments relating to approach to transport?
TOTAL NUMBER OF REPRESENTATIONS:	53
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	12 Support, , 18 Object, 23 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Member of the public	Object	There is not enough consideration into the impact on carbon targets of increasing road traffic through further road developments. A cohesive plan for sustainable development is lacking. More emphasis needs to be placed on alternative means of transport or at very least ways of carbon offsetting.	The need or more consideration of carbon targets and offsetting.
Member of the public	Comment	Economic and social benefits of the East-West rail link deserve greater recognition and advancement in the plan. Connection to Oxford has the potential to reduce road traffic in both directions as would greater commuter use of the line from Cambridge/Thetford to Norwich. An ambitious plan for a bus to rail interchange south-west of Norwich would facilitate and promote those benefits. The local transport plan for a rapid bus to train connection at Wymondham station is too limited. Far better to envisage interchange at Thickthorn or perhaps Ketteringham. Convenient bus services to NNUH etc. then become practical.	Provide the economic and social benefits of the East-West rail link with greater recognition. Wymondham station too limited for rapid bus to train connection. Suggested looking at Ketteringham or Thickthorn for this interchange.

Member of the public	Support	The innovative plan to establish two additional railway stations at Rackheath and at Dussindale would allow many more journeys to work, to education and for leisure to be made by rail. This would contribute to reduced congestion and pollution.	
Member of the public	Support	Supports the ideas concerning transport in the growth corridor but hopes there can also be support outside the growth area. Hopes the GNLP will look favourably at Aylsham in the future proposals from the Cittaslow group. The ideas within this look to the likely look of transport in the next 20 years rather than minor adjustments.	Look favourably at Aylsham in the future proposals from the Cittaslow group
Member of the public	Object	The NDR and proposed Western Link are not necessary to ease traffic congestion, they will add to it. There are less intrusive alternatives to easing any congestion for this area. The roads have taken up green land needed for growing food and for recreation. There are other transport issues requiring greater priority including the poorly maintained state of the current road network and poor bus and local railway system. £60million overspends and green space destructions are not sustainable.	NDR and Western Link are unnecessary and destructive to much needed green space. Improving the maintenance of the road network and the bus and local railway system should be a greater priority.
Member of the public	Comment	NDR is overspending £60 million and the Western Link will have adverse financial and environmental impacts. Further hard coring over greenfield land and allied housing and business developments will increase adverse impact on the environment such as erratic weather patterns, fire storms and flooding. Flora and fauna suffer and people will not be able to enjoy mental and physical benefits of open air and countryside.	Concern over environmental impacts of the NDR and NWL and impacts on physical and mental health.
Member of the public	Comment	Aylsham has good bus services to Norwich. Now a problem of town centre parking being taken up by commuters using the bus service passing through the town to Norwich. Consideration should be given to developing a strategic bus corridor on the A140 with a park-and-ride provision on the periphery of Aylsham with direct access to the A140 to free up parking in the town centre. Suggested locations for the park and ride are on Burgh Road (near Starbucks) and Norwich road (just North of the A140).	Aylsham park and ride provision on the periphery of the town to free up town centre parking.
Member of the public	Comment	We need the maximum concentration on public transport and cycling/walking. We need to actively encourage people to minimise the use of cars.	Actively encourage minimal use of cars
Member of the public	Object	Support the shift away from cars but this is incompatible with building the NWL and A47 dualling. Very expensive projects and money could be better spent on upgrading single carriageways across the valley and providing public transport and cycle	NWL and A47 dualling contradicts a shift away from cars.

		infrastructure. Promised mass transit on the NDR should also be provided before building new roads is considered.	<p>Money spent on these projects would be better placed in public transport and cycle and walking infrastructure.</p> <p>NDR mass transit should be provided before new roads.</p>
Member of the public	Object	The transport strategy seems very dated and would suggest completely revising it. Road building does not help to meet biodiversity and climate change targets and these are not being taken seriously. NWL is a waste of money and should be scrapped. The NDR had a huge biodiversity effect and yet NCC claim otherwise. I have no confidence in their ability to deliver climate promises at all. Spend the 300 million on public transport – that would be forward thinking and sensible.	<p>Transport strategy needs updating. Will not help meet climate change and biodiversity targets.</p> <p>NDR and NWL waste of money and will not help meet targets.</p> <p>Money for these schemes should be spent on public transport.</p>
Member of the public	Object	Cares for wildlife and would like views to be taken into consideration. Would like to say no to the NWL and no to the dualling of the A47 and no to ever building on greenfield sites. In the face of the climate crisis, these plans are suicidal. Humans are not the only species that should be taken into account in planning documents. Our survival depends on healthy ecosystems, not construction.	<p>No to the NWL, A47 dualling and greenfield site building.</p> <p>Appalling impact on climate change and the wrong thing to do in this climate crisis.</p>
Climate Friendly Policy and Planning (CFPP) for Norwich Green Party	Object	23 CONS, page 61, Policy 2, bullet 6. A very weak, bland statement and contains no reference to modal shift and targets for modal shift. We note that the Director of Place, Norwich City Council, has commented that Policy 4 is “insufficiently ambitious in supporting the transition to a low carbon future by achieving significant modal shift” 6.	Impact on emissions – especially after Heathrow decision.

	<p>We would agree and suggest a modal shift hierarchy needs to be developed and made central to Policy 4, Transport section. Road building, known to increase traffic, lock-in car dependence, congestion and carbon emissions, should be the option of last resort. Currently Policy 4 places various road building projects as options of high priority; these should be removed as below.</p> <p>24 CONS, page 76, Policy 4, bullet on A47 dualling, and other projects being promoted by Highways England (HE). Judgement on the Airports National Policy Statement (ANPS) which failed to consider the Paris Agreement will have repercussions for any infrastructure project that increases emissions going forward in the climate emergency. HE A47 dualling projects will increase emissions during construction and use. HE fail to consider the Paris Agreement. Do not believe that the plan can rely on including the A47 proposals under “strategic infrastructure”, and the A47 proposals should be removed.</p> <p>The Paris Agreement has not been considered for the NWL. We do not believe that the plan can rely on including the NWL proposal under “strategic infrastructure”, and it should be removed.</p> <p>We also note that the HRA assessment of Policy 4 at HRA 8.2.2 considers the impact of the NWL on the River Wensum SAC and recommends the additional text underlined ‘Delivery of the Norwich Western Link Road provided that it can be achieved without causing an adverse effect on the integrity of the River Wensum SAC.’ The wording of Policy 4 does not include this recommendation from the HRA.</p> <p>Given the recent, and emerging scientific evidence for impacts to the Weston super-colony of rare and protected species of barbastelle bats, we recommend that if the NWL remains in the plan (above we give reason for its complete</p>	<p>Failure to consider the Paris Agreement in the HE A47 dualling scheme documents.</p> <p>Concerns over legal procedures being followed.</p> <p>Suggest the retraction of the NWL.</p>
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		removal), then the additional text should be “...provided that it can be achieved without causing an adverse effect on the integrity of the River Wensum SAC, and to the Weston super-colony of rare and protected species of barbastelle bats.”	
Member of the public	Object	<p>The aims on sustainable transport are good, but they are not properly supported by the policy, and will be undermined by the proposed new road schemes. I would like to see a policy on last-mile deliveries to support aims on emissions reduction and air quality.</p> <p>Paragraph 209 suggests an alarming misunderstanding of the UK’s net zero emissions target. The target is not for “zero carbon development by 2050” - which suggests it would only apply to new projects – but net zero emissions overall by 2050 from all UK domestic activity. That means “zero carbon development” needs to start now, not in 2049 – but instead, Norfolk is continuing with a 20th-century approach to infrastructure, with major road schemes that will lock us into high levels of emissions for years to come.</p> <p>Business as usual is not going to continue and the long-term plan does not reflect this. Private car use should not be supported in rural areas in the long term (up to 2038). It is damaging and outdated and GN should think creatively about how to make modal shift and local jobs a reality.</p> <p>Improvements to cycle infrastructure in Norwich are very welcome.</p>	<p>Misunderstanding of the UK’s net zero emissions target.</p> <p>Sustainable transport aims undermined by support for new road schemes.</p>
CPRE Norfolk	Comment	<p>CPRE Norfolk does not wish to summarise what are a series of important points into 100 words or less. The consultation should welcome thorough responses, and not imply that only shorter summaries will be reported.</p> <p>CPRE Norfolk supports the provision of new railway stations at Rackheath and especially Dussindale as outlined in paragraph 206.</p>	<p>Contradiction re growth of Norwich Airport and delivering the NWL and aspirations to address climate change.</p>

		<p>We note the contradiction in the Transport for Norwich Strategy as reflected in Policy 4 – Strategic Infrastructure, when it aims ‘to promote modal shift’ by having ‘significant improvements to the bus, cycling and walking network’ on the one hand, but promotes ‘delivery of the Norwich Western Link road’ on the other. CPRE Norfolk fully supports the former set of aims while opposing the latter.</p> <p>CPRE Norfolk supports ‘protection of the function of strategic transport routes (corridors of movement)’, and as part of this strongly suggests that no industrial development should be permitted on unallocated sites along such corridors of movement.</p> <p>The desire to support ‘the growth and regional significance of Norwich Airport for both leisure and business travel to destinations across the UK and beyond’ surely contradicts the aspirations for addressing climate change stated within Section 4 of the draft GNLP?</p> <p>Public transport provision needs to be improved and made affordable, not only between main towns and key service centres, but to and from smaller settlements. This is essential even without any further growth of these settlements, as many areas of rural Norfolk have become public transport deserts.</p>	
Member of the public	Object	<p>Tourism is important to the county as people are attracted to the unspoilt rural nature, wildlife and remoteness. Increased housing and roads will detract from this and make life less tolerable for residents.</p> <p>Contradictions between statement of intent to improve public transport and promote cycling and walking. How can roads be part of this plan? The expensive NWL and Long Stratton bypass feature in the plan and they should not be included. Sensible revamping of junctions, and introduction of good public transport will ease congestion and make new roads unnecessary, as well as improving connectivity for those who do not own a car.</p>	<p>Contradiction between improving public transport and walking and cycling and the creation of the NWL and Long Stratton bypass.</p>

		Increase in housing detracts from general ambience of Norfolk and Norwich as a historic city. Should make better use of the housing stock we already have.	
Hempnall Parish Council	Comment	Public transport provision needs to be improved and made affordable, not only between main towns and key service centres but to and from smaller settlements. This is essential even without any further growth of these settlements, as many areas of rural Norfolk have become public transport deserts.	Improvements needed to public transport even without further growth.
Member of the public	Object	The need for the NWL remains unproven, the option selected may well not help Taverham, Easton or Costessey (particularly with huge housing targets to add to Longwater Lane junction and other transport issues). Growth of Norwich Airport not compatible with carbon targets and potentially the Paris Agreement. Impacts of A47 improvements on the environment have been played down, especially at the junctions proposed in the Tud Valley section which will affect and harm the fragile environments there, particularly during construction and then long after.	Need for the NWL unproven. Airport growth contradicts carbon targets. Environmental impacts in the Tud Valley.
Member of the public	Comment	"As a rule developers are asked to pay for a new schools" From my experience the council do not appear to enforce building of these schools at a realistic time to support the new homeowners and hence existing schools struggle to cope and children have to be transported elsewhere. I confirm that is currently the situation where we now live. Local Transport facilities do not appear to be working in Wymondham why is there a major issue with parking associated with police headquarters , this is all a lack of adequate fore-thought and planning	Schools are not built in time for new developments resulting in schools being full and children having to be transported elsewhere. Local transport facilities not working in Wymondham
Member of the public	Object	Future housing developments should be concentrated in sites close to a railway station to reduce the number of car journeys to employment sites	
Saving Swainsthorpe Campaign	Object	Support investment to improve railway infrastructure.	Contradiction between Norwich Airport expansion and lowering carbon emissions.

		<p>Confusion on some proposals such as Norwich Airport expansion vs lowering carbon emissions.</p> <p>Public transport especially in rural areas would contribute to quality of live within villages and becomes more urgent with housing expansions proposed.</p>	
Lanpro	Comment	<p>Lanpro support the delivery of transport improvements and particularly improvements to facilitate public transport, walking and cycling in a timely manner. This is essential for supporting delivery of housing and employment growth. Delivery of infrastructure to support housing growth in small rural village clusters will be difficult and expensive. These small schemes have limited ability to fund or provide both on and off-site transport improvements through land provision and developer contributions. Significant dispersal of housing growth to small rural clusters should not form part of the growth strategy.</p>	<p>Small village clusters have limited ability to fund or provide transport improvements.</p>
Reedham Parish Council	Comment	<p>Public transport provision needs to be made affordable between main towns and key service centres, and to and from smaller settlements, particularly “village clusters”. This is essential even without future growth.</p>	<p>Affordability and provisions of public transport</p>
Glavenhill Ltd	Comment	<p>Glavenhill Ltd support the delivery of transport improvements, particularly those facilitating public transport, walking and cycling. This is essential to support the delivery of housing and employment growth. Delivery of infrastructure to support small rural village clusters will be difficult and expensive. Small schemes have trouble funding and providing both on and off-site transport improvements through land provision and developer contributions. Significant dispersal of housing growth to small rural clusters should not form part of the growth strategy.</p>	<p>Small clusters expensive and difficult.</p>
Hempnall Parish Council	Object	<p>Public transport provision needs to be improved and made affordable, not only between main towns and key service centres but to and from smaller settlements. This is essential even without any further growth of these settlements, as many areas of rural Norfolk have become public transport deserts.</p>	<p>Improvements needed to public transport even without further growth.</p>
Hingham Parish Council	Comment	<p>Insufficient detail as to how transport provision will be improved for the outer reaches of the GNLP area. Policy lacks ambition to tackle the climate emergency through improvement to transport links.</p>	<p>Inconsistency between JSC and GNLP re bus services.</p>

		<p>No commitment to improvements in Hingham which is experiencing increasing traffic numbers on the B1108.</p> <p>Statement that Hingham has “good transport links” is not accurate. JCS stated Hingham has “limited bus service” and since then the bus services have fallen. Bus services are limited.</p> <p>Do not feel Hingham is “well located to benefit from additional employment opportunities in the Cambridge Norwich Tech Corridor” as one bus an hour to the Research Park and a bus to Hethel Innovation Centre (20min drive) takes 2hrs via Norwich.</p> <p>People travel outside of GN for work, local amenities or leisure (into Breckland) and there are limited or no public transport links directly available to these places. Plans make it hard to shift away from the private car.</p> <p>No mention of road infrastructure improvements to support additional traffic through the rural communities experiencing housing growth and no mention of infrastructure ensuring adherence to speed limits.</p> <p>Safety concerns at the B1108 Fairland crossroads which will be exacerbated by new developments. Successful NCC Parish Partnership bid to have feasibility work done on this. Need firm commitment from Highways Authority to undertake this work.</p>	<p>Poor description of Hingham’s bus service and the benefits the town receives from the Cambridge-Norwich Tech Corridor.</p> <p>Need firm commitment on B1108 Fairland cross road safety work.</p>
Brown & Co	Support	<p>Proposed settlement at Honingham Thorpe is well related to the strategic road network and supports planned improvements to the A47. Brown & Co responding to HE consultation on North Tuddenham to Easton Dualling. The timing of this improvement corresponds with the timetable of the GNLP.</p> <p>New settlement facilitates modal shift due to the creation of a walkable neighbourhood.</p>	

		Location of the new settlement is close to Easton's proposed BRT route and it is the intention of Clarion to secure an electric bus service for the village to and from Norwich.	
Hempnall Parish Council	Object	Public transport provision needs to be improved and made affordable, not only between main towns and key service centres but to and from smaller settlements. This is essential even without any further growth of these settlements, as many areas of rural Norfolk have become public transport deserts.	Improvements needed to public transport even without further growth.
UEA Estates & Buildings (Agent: Bidwells)	Support	Supportive if infrastructure to develop the role of Norwich and support the Cambridge Norwich Tech Corridor. Supportive of dedicated provision of cross valley transport link between the UEA and the wider Norwich Research Park, alongside significant improvements to the bus, cycling and walking networks in the area.	
South Norfolk Green Party	Comment	Support for the new railway stations at Rackheath and especially Dussindale. Statement on promoting a modal shift is conflicting with promoting the delivery of the NWL. "Improvements to" Norwich Airport changes to "growth of" in the Strategic Infrastructure section and does not support climate change visions and objectives stated in Section 4. Public transport provision needs to be improved and made affordable between main towns and service centres and to and from smaller settlements, even without further growth. No mention of BRT promised in the NATS and the JCS.	Conflict between modal shift and delivery of NWL. Concerns over growth of Norwich Airport and climate targets. Improve public transport provision.
Mulbarton Parish Council	Comment	Public transport provision needs to be improved and made affordable, not only between Mulbarton, main towns and key service centres, but to and from smaller settlements.	Improve public transport provision.
Norwich International Airport	Comment	Support the NWL which is a critical infrastructure improvement to facilitate economic growth by increasing the Airport's accessibility and connectivity. Increases the site's attractiveness as a strategic employment location. The NWL should be prioritised for construction in the early period of the GNLP.	
Norwich Liberal Democrats	Object	Lacking ambition in supporting transition to a low carbon future by achieving modal shift as the plan does not fully recognise the need to integrate transport and land use policies. Rail and bus services should be higher priority than road building and	Need provision of buses in Village Clusters.

		<p>continued use of private cars. Village Clusters model would increase the need to travel for work, education and access services by private car. Given the Climate Change Statement Village Clusters allocations in areas with little or no public transport cannot be justified.</p> <p>No mention of 'mobility hubs' which are currently being developed through Transforming Cities.</p> <p>Believe improvements to bus services is key to delivering climate change agenda, improving access to public transport and achieving a 'car free' Norwich city centre. Need to invest in electric and hybrid bus fleets.</p> <p>Strongly object the emphasis on road expansion, NWL and Norwich Airport growth as this contradicts promoting a modal shift and the plan's aim in Section 4 to mitigate climate change.</p> <p>Oppose the NWL, the Yare Valley Bus Link, the growth of Norwich Airport.</p> <p>No detail of how rail enhancements will be achieved.</p>	<p>Contradiction between road expansion and airport growth, and aims to promote modal shift and mitigate climate change.</p> <p>No detail of how rail enhancements will be achieved.</p>
Norwich Liberal Democrats	Support	<p>Support idea of new stations at Broadland Business Park and welcome new station at Rackheath. East-West rail opens opportunities for station at Thickthorn to serve UEA, Norwich Research Park and NNUH. Support this along with a Transport Hub. Would serve growing South Norfolk residential areas.</p> <p>Urge NCC to work with Network Rail to improve Trowse Swing Bridge to a two track bridge as it is currently an impediment to Norwich fully benefitting from the East-West Rail Link.</p>	NCC to work with Network Rail to achieve new rail infrastructure at Trowse Swing Bridge.
Suffolk County Council	Comment	<p>Growth and construction of A140 roundabouts provides an opportunity to enable improved connections and journey times for bus services to Diss Railway Station across the county boundary. This would encourage use of public transport and aligns with carbon targets and modal shift. SCC can provide transport data informing future traffic modelling work. Key strategic cross county road links are likely to be the A140, A143, A146 and B1077.</p> <p>Improvements to the A140, specifically around Long Stratton, may reduce longer distance travel times between north Suffolk and the Norwich area, increasing people's</p>	

		<p>propensity to commute longer distances, and increasing cross-border traffic flows and stress at key strategic junctions.</p> <p>SCC happy to work cross border to get value for money and more useful passenger transport routes.</p>	
Create Consulting Engineers Ltd.	Object	<p>GNLP falls short of planning for sustainable movement and consequently fails to maximise a sustainable land use patters to underpin growth over the period 2018-2038 without an orbital transport proposal.</p> <p>The GNLP does not sufficiently consider presently available innovative movement technology in its planning for movement, nor does it provide a sufficiently robust movement proposition such that technological advances can be grasped for the benefit of the greater Norwich area over the coming 20 year period.</p> <p>Fundamental ambition of the GNLP should be to deliver choice and the ability for households to “live locally”, supported by public transport access to employment areas and strategic facilities.</p> <p>Attached plans describing potential of planning for additional public transport within GN area to support circular movement of busses connecting Broadland Business Park with the Airport Business Park, Norwich Airport to the north. Could extend to UEA and Norwich Research Park area.</p> <p>Propose light rail on last section into Norwich of the Bittern Line and Gt Yarmouth line. Involve new multi-modal interchange at the NDR junction of Plumstead Road providing regular rail service from city centre to Broadland Business Park and residential community.</p> <p>Suggest Norwich Orbital Service linking employment areas of east and north with a link across to NRP/UEA/NNUH by autonomous electric bus or light rail/tram. This multi-modal transport strategy would be managed and controlled as part of new SMART transport strategy for Norwich. Provision of live travel advice for end users.</p> <p>This proposition underpins sustainable leisure and recreation. This would be intensified if transport interchanges and other key points offered bike hire and parking.</p> <p>GNLP should include potential for building significant new public transport infrastructure to deliver on sustainability.</p>	<p>Needs increased emphasis on sustainable transport and public transport growth.</p> <p>Need to consider orbital movement</p>

<p>Norwich Green Party</p>	<p>Object</p>	<p>Object the transport strategy proposed, specifically object road building schemes; failure to identify measures for making best use of the transport network; of the GNDP to upgrade the public transport system as part of the JCS and enabling additional road traffic growth; to the lack of alternative sources of funding in place of the Transforming Cities Fund for facilitating modal switch to sustainable transport; to the lack of demand management measures for constraining traffic. Specific objections include the NWL, enhancement of the major road network, supporting improvement to the A47 and supporting growth of Norwich Airport. Priority given to road schemes contradicts other priorities such as climate change mitigation. New roads to ease congestion will eventually reach capacity and become congested again. EVs are not the answer as their manufacturing and the creation of road infrastructure emits high levels of carbon. NWL would cause adverse harm to the River Wensum SAC and to the Wensum and Tud valleys which have complex habitats and protected wildlife. NWL would increase carbon emissions. Air pollution and noise. Suggest the removal of the NWL from the GNLP. NCC habitat assessment did not pick up on the Barbastella bats living in the woods of the preferred route. Suggest changing of words in the GNLP: the Habitats Regulation Appropriate Assessment of Policy 4 ‘Strategic Infrastructure’ (Section 8) states that there is potential for the NWL river crossing to cause harm to the Wensum SAC It recommends amending the policy to reflect the importance of avoiding adverse effect upon the River Wensum SAC. The recommended text for the policy text relating to the road reads:</p> <ul style="list-style-type: none"> • ‘Delivery of the Norwich Western Link Road provided that it can be achieved without causing an adverse effect on the integrity of the River Wensum SAC.’ <p>The GNLP Policy 4 should be amended as above.</p> <p>Likely legal challenge for the A47 dualling North Tuddenham to Easton scheme is likely in light of Heathrow third runway decision as it was not consistent with the Paris Agreement and the Climate Change Act. Alternatives to the scheme could include smart highways, travel planning and encouragement of switches to sustainable transport.</p>	<p>Priority given to road schemes contradicts other priorities such as climate change mitigation.</p> <p>NWL would cause adverse harm to the River Wensum SAC and to the Wensum and Tud valleys which have complex habitats and protected wildlife.</p> <p>Suggest the removal of the NWL from the GNLP.</p> <p>Barbastella bat habitat living along the preferred route – this was not picked up in the habitat assessment</p> <p>Possible legal challenged re A47 dualling scheme and climate impact.</p> <p>Improve public transport provision.</p> <p>Cross valley bus link between UEA and NRP environmentally damaging.</p>
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		<p>Oppose airport expansion on climate change grounds. Should be reducing frequent flyers.</p> <p>Support improvements to bus, cycling and walking network to promote modal shift but a more radical package of measured needed.</p> <p>Growth in the GNLP has been predicted on developing public transport which will not get as much funding as it would due to unsuccessful Transforming Cities Bid.</p> <p>Alternative funding must be found such as workplace parking charges – but this takes years to implement.</p> <p>Do not support developing P&R as people should be leaving their cars at home; cross valley bus link between UEA and NRP.</p> <p>Would like to see enhancement of local rail network.</p>	
Breckland District Council	Comment	<p>The Greater Norwich Energy Infrastructure Study April 2019 identifies shortfalls in supply for new development proposes in the GNLP and it will impact on developments outside the GNLP. Grids are at full capacity. Breckland District Council welcome the opportunity to engage with GNLP to explore a joint approach to any constraints which may arise as a result of cumulative growth in both planned areas.</p>	Concerns over energy infrastructure capacity
Highways England	Comment	<p>Paragraph 205 should be amended stating that delivery timescales are set out in the current Highways England delivery plan. Dates shown are subject to DCO and other processes and therefore subject to change.</p> <p>Supportive of the general approach to the policy on strategic infrastructure. Needs for additional junctions on strategic road network is subject to government policy set out in DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development there is a presumption against new junctions except where they can be demonstrated they meet a strategic growth test.</p>	Edit paragraph 205.
Broadland Green Party	Comment	<p>The plan needs more substance around improving public transport and how to bring about a culture change in traditional forms of commuting and working. This is the solution on “rat running” issues in the Costessey and Taverham areas which has been made worse by the NDR.</p> <p>The NWL is not necessary to accommodate traffic from the North East as stated and the road will create irreversible damage to the environment and biodiversity in the</p>	Culture change and public transport improvements are the solution, not building new roads.

		area. Bus priority work, involving reallocating road space freed up by the NDR, has not happened.	Bus priority work which was supposed to happen in Norwich has not come to fruition.
Sport England	Comment	Support the policy as it seeks to make significant improvements to the cycling and walking network and the development of a multifunctional green infrastructure network. Increasing school capacity should not be at the expense of outdoor spaces for sport and hence Sport England object schemes which result in this without meeting exceptions identified in Para 97 of the NPPF.	
Saxlingham Nethergate Parish Council	Comment	Support provision of new railway stations at Rackheath and especially Dussindale. Note the contradiction between promoting a modal shift through walking, cycling and bus network improvements and promoting the delivery of the NWL, which is opposed. Support the protection of corridors of movement and as part of this strongly suggest no industrial developments being permitted on unallocated sites along such corridors. Airport growth and climate change aspirations are contradictory. Public transport needs to be made more affordable and improved between main towns, service centres and smaller settlements even without further growth.	Contradiction between promoting modal shift and promoting the NWL. Contradiction between supporting growth of Norwich Airport and aspirations for addressing climate change.
Railfuture East Anglia	Comment	Disappointed that while the GNLP aspires to a considerable shift to non-car modes of transport, very little detail is given on how this will be achieved. Rail receives little reference in the document and needs a stronger vision for delivering and promoting rail services in the GN area. Suggest new train service pattern of 2tph from the Yarmouth and Lowestoft lines with all stations having at least 1tph; 2tph semi fast from Cambridge including 1tph from Stansted Airport; 1tph fast from Peterborough; 1tph all stations from Thetford Cross City to North Walsham; 1tph semi fast from Sheringham; 1tph all stations including Long Stratton (see below) from Ipswich; 2tph fast from London Liverpool Street. Ideally the 1tph from Stansted Airport should continue cross city to Yarmouth. Stress the importance of dual tracking the Trowse Swing Bridge. Access at Wymondham Station is unacceptable especially as this is now intended to be a transport hub. Diss station is also not fit for purpose and requires a lift. Re. new stations, it may be necessary to consider their provision and the provision of additional trains as separate projects.	Value of Regulation 18 has been diminished. Access to the Cambridge facing platform at Wymondham Station unacceptable. Diss station access is also poor and requires installation of lifts.

		<p>Railfuture East Anglia support reintroduction of Wymondham to Dereham line. They also support a new station near Long Stratton. Journeys to and from stations must be as integrated as possible. The Transforming Cities bid to aid this integration is welcomed.</p> <p>Acknowledge more detail has been promised for the submission version of the plan. Presume draft of the Norfolk Rail Prospectus will contribute to the plan. See no reason why a stronger strategic framework could not have been set out in the document. The value of Regulation 18 consultation has been diminished as the transport strategy will only properly be presented after the consultation.</p>	
Pegasus Group	Support	Support improvements to public transport accessibility to and between main towns and key service centres. Client welcomes any further improvements to increase accessibility of Loddon by sustainable modes of transport.	
Member of the Public	Object	<p>Public transport and a move away from cars should be the primary consideration for transport rather than building more roads.</p> <p>Broken promises re. public transport improvements as part of the NDR.</p> <p>NWL and UEA/Hospital link are concerning as both cross sensitive river valleys. No evidence that these are critical to the housing or employment proposals in the Plan. This does not justify the destruction of these protected areas.</p>	NWL and UEA/Hospital link are concerning as over environmentally sensitive areas. – no evidence these schemes are critical.
Crown Point Estate	Comment	Support the Loddon Park and Ride. This also supports intended shift to EV use as the Park and Ride facility is the ideal location for EV charging infrastructure.	
Bidwells/UEA	Support	The UEA are supportive of improvements to transport infrastructure to develop the role of Norwich and support the Cambridge Norwich Tech Corridor. The UEA are supportive and dedicated to the provision of a cross valley transport link between the UEA and the wider Norwich Research Park, alongside significant improvements to the bus, cycling and walking networks around this area.	
Bidwells/UEA	Support	As above.	
Bidwells/UEA	Support	As above.	
Barratt David Wilson Homes	Support	Support for shift towards non-car modes of travel. There are concerns that the proposed allocations through the South Norfolk Village Clusters Housing Sites Allocation document would deliver less sustainable forms of development in lower	Concern over village clusters and how this may promote a greater dependency on the car

		<p>order settlements. This would lead to greater car dependency and the negative health and environmental impacts that this creates. Therefore, maximising the use of land in higher order settlements, near to places of employment in Norwich, is a sound approach to accommodating the future housing needs of the Greater Norwich area. Councils should focus development on the edge of existing sustainable settlements such as Cringleford. Also, able to make use of existing social infrastructure, helping with community cohesion and access via walking and cycling.</p> <p>Should increase site allocations at Cringleford to maximise the site.</p>	
Bidwells/UEA	Support	<p>The UEA are supportive of improvements to transport infrastructure to develop the role of Norwich and support the Cambridge Norwich Tech Corridor. The UEA are supportive and dedicated to the provision of a cross valley transport link between the UEA and the wider Norwich Research Park, alongside significant improvements to the bus, cycling and walking networks around this area.</p>	
Hingham Parish Council	Object	<p>Insufficient detail as to how transport provision will be improved for the outer reaches of the GNLP area. Policy lacks ambition to tackle the climate emergency through improvement to transport links.</p> <p>No commitment to improvements in Hingham which is experiencing increasing traffic numbers on the B1108.</p> <p>Statement that Hingham has “good transport links” is not accurate. JCS stated Hingham has “limited bus service” and since then the bus services have fallen. Bus services are limited.</p> <p>Do not feel Hingham is “well located to benefit from additional employment opportunities in the Cambridge Norwich Tech Corridor” as one bus an hour to the Research Park and a bus to Hethel Innovation Centre (20min drive) takes 2hrs via Norwich.</p> <p>People travel outside of GN for work, local amenities or leisure (into Breckland) and there are limited or no public transport links directly available to these places. Plans make it hard to shift away from the private car.</p>	<p>Inconsistency between JSC and GNLP re bus services.</p> <p>Poor description of Hingham’s bus service and the benefits the town receives from the Cambridge-Norwich Tech Corridor.</p> <p>Need firm commitment on B1108 Fairland cross road safety work.</p>

		<p>No mention of road infrastructure improvements to support additional traffic through the rural communities experiencing housing growth and no mention of infrastructure ensuring adherence to speed limits.</p> <p>Safety concerns at the B1108 Fairland crossroads which will be exacerbated by new developments. Successful NCC Parish Partnership bid to have feasibility work done on this. Need firm commitment from Highways Authority to undertake this work.</p>	
Orbit Homes	Comment	<p>Comments reiterate earlier concerns re the alignment of the growth strategy with transport priorities and investment, summarised as:</p> <ul style="list-style-type: none"> • A11 is not being utilised or maximised to deliver growth in the GNLP • The rail network, including mobility hub at Wymondham, should be given more focus as an opportunity to support strategic growth at this location. • To achieve a modal shift, new development allocations should be at locations close to, and transport integrated with, railway stations. This is not the case for considerable amount of the proposed allocations. • A number of allocations are predicted on third party infrastructure investment which is not certain. This risks undermining the delivery of the GNLP. 	<p>New development allocations should be placed close to railway stations to achieve a modal shift.</p> <p>Risk of the delivery of the GNLP being undermined by third party infrastructure investment predictions.</p>
Salhouse Parish Council	Support	<p>Support provision of new railway stations at Rackheath and especially Dussindale. Note the contradiction between promoting a modal shift through walking, cycling and bus network improvements and promoting the delivery of the NWL, which is opposed. Support the protection of corridors of movement and as part of this strongly suggest no industrial developments being permitted on unallocated sites along such corridors. Airport growth and climate change aspirations are contradictory. Public transport needs to be made more affordable and improved between main towns, service centres and smaller settlements even without further growth.</p> <p>Transport needs to be organised with the priority being service, with frequency being provided according to need and not commercial viability. Subsidise if necessary.</p>	<p>Contradiction between promoting modal shift and promoting the NWL.</p> <p>Contradiction between supporting growth of Norwich Airport and aspirations for addressing climate change.</p>

QUESTION 24

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	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)?
TOTAL NUMBER OF REPRESENTATIONS:	35
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	2 Support, 4 Object, 29 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Member of the public	Comment	The plan seems to take account of and address micro infrastructure issues however, in the respondents opinion, the plan does not focus enough on Hospital provision or mental healthcare overall. Local GPs refer patients to the NUH, QE or JPH NHS Trusts which have limited capacity and some of the worst A&E waiting times in the UK. The plan leads to population growth built there seems to be no account for the need to expand the hospital bed capacity accordingly.	Concern over population growth's impact on the capacity of healthcare services in the county.
Member of the public	Comment	Concern over lack of additional healthcare provision in Sprowston which is already under serious strain. Each new household, regardless of the ages, will need a doctor. There seems to be very little information on healthcare.	Concern over the strain new developments will put on healthcare facilities.
Member of the public	Object	Irresponsible to issue plans to continue building developments before there is a plan to complete the infrastructure to serve and support the expansions already underway.	Concern that developments are built before supporting infrastructure.
Member of the public	Comment	Cannot keep building new housing without sufficient infrastructure, notably doctors, schools and recreational spaces. Councils need to look out for	Concern that housing is being built without sufficient social infrastructure.

		residents and check large developers, who seem to only be interested in maximising profit.	
Member of the public	Comment	Green tech and infrastructure needs more serious investment. Without this, we will fail to meet climate targets, the progress of which is currently way off.	Concern not enough green infrastructure to meet climate targets.
Welbeck Strategic Land III LLP	Comment	Clarification is required as to the extent of education contributions likely to be required. Confusion over how the building of new schools is paid for. Is it through CIL or does the developer have to pay the full cost? Consideration should be given to whether it is viable for some of the larger strategic sites to pay the Community Infrastructure Levy, in addition to the requirements of the Local Plan. The potential for infrastructure costs which are specific to larger strategic sites to be secured by Section 106 planning obligations, in order to ensure that such sites are deliverable and, importantly, that there is certainty regarding the delivery of the infrastructure, should be explored. This approach, which has been adopted by Mid Suffolk District Council, is entirely consistent with the Community Infrastructure Regulations (2019).	Clarification needed
Member of the public	Comment	It is irresponsible to imagine that the existing health services and schools will be able to respond to the “growth” levels predicted. Hospitals and ambulance services are continually struggling and schools are failing from cost pressures.	
Saving Swainsthorpe Campaign	Comment	The emphasis on policies that reduce the number of car journeys is commendable, but we view the proposals as too generalised and lack a clear focus on action.	Proposals are too generalised.
Hopkins Homes, Persimmon Homes and Taylor Wimpey	Comment	Welcome and support proposal for continued lobbying of statutory providers for the timely delivery of improvements to infrastructure, such as the energy supply network. Consortium are committed to continued engagement with NCC in relation to the potential to accommodate a secondary school on the site GNLPO132. Need further clarification re funding mechanisms and the relationship with CIL.	Need further clarification regarding funding mechanisms and the relationship with CIL.

Kier Living Eastern Ltd	Comment	The proposal for continued lobbying of statutory providers for the timely delivery of improvements to strategic infrastructure, such as the energy supply network, is welcomed and supported. This will be critical to ensuring the timely delivery of the planned growth	
Anglian Water Services Ltd	Comment	<p>Policy 4 as amended should refer to both water recycling and water supply infrastructure and the Greater Norwich Authorities working together with infrastructure providers including Anglian Water.</p> <p>Para222: Reference is made to no additional spending being required for water supply infrastructure. However, the WRMP includes new potable water transfers to be funded by Anglian Water through customer bills. Anglian Water would also expect developers to pay appropriate charges for the required connections to the water supply network. Referenced Anglian Water documents have now been published and the WRMP is reviewed on a continuous basis and a new plan will be prepared for 2024. Also preparing a Drainage and Wastewater Management Plan in partnership with stakeholders to inform the next 2024 business plan. GNLP text should be updated on this.</p> <p>Para225: Anglian Water promotes the use of Sustainable Drainage Systems which have benefits to the environment and communities.</p> <p>Para226: reference is made to improved monitoring as outlined in Anglian Water's Water Recycling Long Term Plan. This relates to the monitoring of foul flows within the network rather than existing Water Recycling Centres as stated.</p> <p>Para227: Anglian Water applies developer charges directly for connections to water supply network and foul sewerage networks</p> <p>Para228: Policy recommendations have not been carried forward into the wording of Policy 2.</p> <p>Suggest Policy 4 amended to: 'The Greater Norwich Local Authorities and partners [including utility companies will work together in relation to] [new</p>	Suggested alterations to paragraphs.

		text] [lobby for] [text to be deleted] the timely delivery of improvements to infrastructure...and to' Water supply and sewerage network improvements are not referred to more generally.	
Lanpro Services	Comment	Support strategic infrastructure delivery in a timely manner. Delivery of necessary infrastructure to support dispersal of housing growth to small rural village clusters will be difficult and expensive. Funding the delivery of services and facilities to small schemes is limited. Small rural clusters should not from part of the growth strategy.	Concern over delivery of village clusters.
Glavenhill Ltd	Comment	Support strategic infrastructure delivery in a timely manner. Delivery of necessary infrastructure to support dispersal of housing growth to small rural village clusters will be difficult and expensive. Funding the delivery of services and facilities to small schemes is limited. Small rural clusters should not from part of the growth strategy.	Concern over delivery of village clusters.
Hingham Parish Council	Comment	No commitment to improvements in Hingham. Concern in the community of the pressure more housing will have on the primary school and Drs surgery. No high school and no public car park and businesses in the Market Place and Fairland have no dedicated parking therefore unlikely to achieve green travel e.g. provision of EV charging points. Developments in surrounding areas are putting strain on Hingham Primary School. Also concern over lack of local child care places to assist working parents.	Concern over pressure housing growth is having on school and dr surgery.
Persimmon Homes (Anglia)	Comment	Interim Viability Study does not include a typology of schemes in excess of 600 dwellings, creating a gap in terms of taking account of site-specific infrastructure costs of larger, strategic level housing schemes and associated viability implications. Lower level of CIL should be considered to address this issue and support strategic site delivery.	
Brown & Co	Support	Support the approach to other strategic infrastructure. The proposed new settlement Honingham Thorpe would deliver strategic infrastructure from	

		the start, to facilitate the creation of a sustainable community from the first occupation of any dwelling.	
Department for Education (DfE)	Comment	<p>Advise policy wording amendments to ensure the policy is sufficiently flexible and can endure the plan period: “School capacity will be increased to provide for growth by improvements and expansions to existing schools and the provision of new schools as required, including primary schools on strategic development sites and growth areas as identified in the most up to date evidence base.” Education infrastructure requirements should be included within an Infrastructure Funding Statement. The statement should identify the anticipated CIL and Section 106 funding towards this type of infrastructure and should be reviewed annually to report on the amount of funding received via developer contributions and how it has been used. Add DfE to the database for future consultations on relevant plans and proposals.</p> <p>Support revised CIL Regulations and the use of planning obligations to secure developer contributions for education.</p> <p>Paragraph 230 does not accord with DfE guidance on developer contributions therefore propose following amendment: “If a new development is likely to generate enough children to fill a new school, developers are expected to contribute both the land and for the full construction cost of that school. A pro rata contribution is requested if pupil yield is calculated to be less than a full new school and the school places are to be provided elsewhere through expansions or on other development sites. Land must be secured through S106 Agreements, and contributions towards both on-site and off-site education can be secured through both S106 Agreements and CIL where applicable locally.”</p> <p>Request reference in policies to explain developer contributions may be secured retrospectively.</p>	Suggested amendments

RSPB (East of England Regional Office)	Comment	Need to know when Anglian Water's strategic plans for water supply and disposal will be completed and made public in order to comment fully on the GNLP and to understand what these strategic proposals are.	Need more information to make a comment.
Member of the public	Object	Concern over the attitude to Climate Change and Renewable Energy table 8 item 10. With regard to Policies 2 & 4 the current requirement of the NPPF regarding land-based wind farms is absolutely appropriate. Land-based wind farms should only occur after consultation; where, when and if there is strong local support.	Concern over table 8, item 10.
Barton Willmore on behalf of Berliet Limited	Object	We note that the Greater Norwich Sports Facilities Strategy is currently being reviewed. On this basis, we would question the ability of any decisions or judgements to be made in respect of proposed site allocations on the grounds of sports or leisure provision.	Question the ability to make any decisions due to current review being undertaken.
Natural England	Comment	No specific references to Green Infrastructure in supporting text or policy and it is advised that this changes. GNIP fails to identify any strategic infrastructure to meet environmental requirements. Without this, it is unclear how the Plan will deliver sustainable growth or address impacts on climate change. This needs addressing under the heading of 'Strategic Green Infrastructure' both in the supporting text and within the policy wording.	Unclear how the Plan will deliver sustainable growth or address impacts on climate change
Norfolk Wildlife Trust	Comment	Unclear which elements are reliant on the provision of strategic infrastructure and are therefore at risk of delivery, should the infrastructure projects fail to be delivered. Seek further clarification regarding the risks to delivery of the plan if infrastructure proposals are not able to be delivered. There is a legal need for the plan to demonstrate that adverse effects on European Sites will be avoided.	Further clarification needed on the risks to the delivery of the plan.
Environment Agency (Eastern Region)	Comment	Rephrase paragraph 227 to improve clarity over ensuring that foul drainage infrastructure is provided in a timely manner ahead of occupation of new properties. Suggestion: " taking account of the above evidence, the policy therefore commits the Greater Norwich authorities to lobbying for the timely delivery of improvements to wastewater infrastructure by AW in line	Concern over Aylsham allocations and the capacity of the Aylsham WRC. Suggested rewording.

		<p>with development time scales, ensuring there is sufficient capacity ahead of occupation of properties.” Growth and development has the potential to reduce the efficient of wastewater infrastructure, leading to major problems. Water waste treatment and the quality of the water environment should be addressed.</p> <p>Aylsham WRC currently only has room to accommodate around 160 dwellings before reaching capacity but the GNLP has allocated far more developments in the area. Therefore would like to see Aylsham WRC listed here with plans for sewerage infrastructure and upgrades. Would also be useful to provide evidence for plans to increase capacity at Aylsham WRC in paragraph 214.</p> <p>Explain how the recommendations for the Water Cycle Study will be used to inform development.</p>	
Department for Education	Comment	<p>Advise policy wording amendments to ensure the policy is sufficiently flexible and can endure throughout the plan period. education infrastructure requirements for the plan period should be included within an Infrastructure Funding Statement. Where additional need for school places will be generated by housing growth, the statement should identify the anticipated CIL and Section 106 funding towards this infrastructure. The statement should be reviewed annually to report on the amount of funding received via developer contributions and how it has been used.</p> <p>DfE support revised CIL Regulations and the use of planning obligations to secure developer contributions for education.</p> <p>Request reference in policies to explain developer contributions may be secured retrospectively.</p>	Advise rewording of some sections. (see above DfE response)
Barton Willmore	Comment	<p>The scale of new development requires the provision of new infrastructure to appropriately and sustainably meet demands of this growth. Need to address the education capacity issue in Wymondham which was highlighted by the Examining Inspector for the Wymondham Area Action Plan as being “necessary to review” as part of future plan-making exercises.</p>	Must address Wymondham education capacity issue

Highways England	Comment	Wind power is key element to sustainable energy but not mentioned in the plan and should be considered for inclusion. Strategic Road Network provides an opportunity to facilitate and deliver on and off-shore wind.	Include wind power in the plan.
Broadland Green Party	Comment	Renewable energy should be encouraged and supported including the promotion of community energy projects. Problems with water supply, sewerage capacity and sewage works capacity across the county. Need to review the way utility companies contribute to decisions on planning applications. Views of utilities regarding local capacity should have higher priority. Anglian Water should reinvest profits into public infrastructure. Existing water resources cannot support increased population.	Concern over the ability of existing water resources to cope with growth.
M Scott Properties Ltd	Comment	Clarification required as to the extent of education contributions likely to be required. If the existing situation (developer provides land for school, with construction funded through CIL) has changed, it will have significant implications for viability.	Clarification needed.
Member of the public	Comment	In any future text give greater emphasis to the work that is going on with respective partner organisations to ensure that planning for healthcare and education and transport links is taking place. Greater prominence in the report of thought into the impact of growth on GP and school capacities is needed to allay fears.	
Crown Point Estate	Support	Additional land at WCP should be safeguarded for extended country park-related development.	
Bidwells	Comment	Zonal charging approach adopted by Anglian Water in relation to infrastructure provision should be explored to see if it can be applied to other strategic infrastructure e.g. electricity. Provides certainty for developers.	
Bidwells on behalf of Abel Homes	Comment	Zonal charging approach adopted by Anglian Water in relation to infrastructure provision should be explored to see if it can be applied to other strategic infrastructure e.g. electricity. Provides certainty for developers.	

Hingham Parish Council	Object	No commitment to improvements in Hingham. Concern in the community of the pressure more housing will have on the primary school and Drs surgery. No high school and no public car park and businesses in the Market Place and Fairland have no dedicated parking therefore unlikely to achieve green travel e.g. provision of EV charging points. Developments in surrounding areas are putting strain on Hingham Primary School. Also concern over lack of local child care places to assist working parents.	Concern over the pressure housing growth will put on schools and dr surgery.
Salhouse Parish Council	Comment	Priority needs to be given to improving inadequate infrastructure and developers should not be permitted to utilise existing infrastructure without consideration for its capacity.	
Hopkins Homes	Comment	The proposal for continued lobbying of statutory providers for the timely delivery of improvements to strategic infrastructure, such as the energy supply network, is welcomed and supported. This will be critical to ensuring the timely delivery of the planned growth. It is supported that Anglian Water have plans to increase capacity at the local water recycling centre. Aylsham should be taken forward as an allocation as development in this location represents sustainable development due to the social, economic and environmental benefits coming from growth here.	

QUESTION 25

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 25 - Do you support, object or have any comments relating to the approach to on-site and local infrastructure services and facilities?
TOTAL NUMBER OF REPRESENTATIONS:	22
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	15 Support, 1 Object, 6 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Burlingham Cottage Gardeners	Support	Support the call from Acle and Lingwood/Burlingham communities for a foot/cycle path alongside the A47. Support for this from 3 Parish Councils, Broadland, NCC and MP Jerome Mayhew. Also support crossing at North Burlingham which was defined as “vital” in 2015 study by Broadland and NCC.	
Welbeck Strategic Land III LLP	Comment	Policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery. The need to support sustainable growth through provision of infrastructure improvements is supported.	Infrastructure provision must be proportionate to development
Hopkins Homes, Persimmon Homes and Taylor Wimpey	Support	Policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery. The need to support sustainable growth through provision of infrastructure improvements is supported. Consideration should be given to the potential for larger strategic-scale housing sites to be CIL exempt or subject to bespoke CIL charge.	Infrastructure provision must be proportionate to development. Consider making large strategic-scale housing sites exempt from CIL.

Kier Living Eastern Ltd	Support	Policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery. The need to support sustainable growth through provision of infrastructure improvements is supported.	Infrastructure provision must be proportionate to development.
Lanpro Services	Comment	See answer to question 24.	
Glavenhill Ltd	Comment	See answer to question 24.	
Hingham Parish Council	Comment	Developers should be looking to contribute to improving and sustaining infrastructure beyond the boundary of the development to help to ease the burden on existing infrastructure and facilities.	Developers should contribute to more than just the development itself.
Brown & Co	Support	Honingham Thorpe would deliver on-site infrastructure, services and facilities prior to first occupation. This is essential to create a sustainable community and reduce pressures on existing facilities elsewhere.	
UEA Estates and Buildings	Support	Policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery. The need to support sustainable growth through provision of infrastructure improvements is supported.	Infrastructure provision must be proportionate to development.
M Scott Properties Ltd	Support	Approach to infrastructure and facilities is supported and as proposed at client's site, land between Shelfanger Road and Mount Street, there would be considerable community benefits from the provision of land for medical centre expansion and access to open space. Scope in Policy 4 to address the need to provide community uses on larger schemes that benefit future and existing residents.	Scope in Policy 4 to address the need to provide community uses on larger schemes that benefit future and existing residents.
M Scott Properties Ltd	Support	Policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery. The need to support sustainable growth through provision of infrastructure improvements is supported.	Infrastructure provision must be proportionate to development.
Strutt & Parker LLP on behalf of Scott Properties Ltd	Comment	Policy 4 approach for on-site and local infrastructure, services and facilities is supported as shown for the site known as Land at Briar Farm, Harleston. This approach is being taken to ensure the site brings forward the required on-site services and facilities. Scope in Policy 4 to address the need to provide community uses on larger schemes that benefit future and existing residents.	Scope in Policy 4 to address the need to provide community uses on larger schemes that benefit future and existing residents.

Strutt & Parker LLP on behalf of M Scott Properties Ltd	Support	Policy 4 approach for on-site and local infrastructure, services and facilities is supported and being on the client's site to ensure the site brings forward the required on-site services and facilities. Scope in Policy 4 to address the need to provide community uses on larger schemes that benefit future and existing residents.	Scope in Policy 4 to address the need to provide community uses on larger schemes that benefit future and existing residents.
Pegasus Planning Group on behalf of member of the public	Object	Suggested amendment to policy wording as concerned it does not adequately reflect the ability individual developers have in respect of infrastructure delivery. Original text: 'Development proposals will provide on-site services and facilities and support local infrastructure capacity improvements through on-site provision, providing land and developer contributions.' Suggested amendment: 'Development proposals will be expected to mitigate the impacts of the scheme proposed on local infrastructure through either the provision of on-site services and facilities (where appropriate and necessary) and/or by supporting local infrastructure capacity improvements.'	Suggested wording amendment
Bidwells on behalf of Abel Homes	Support	Policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery. The need to support sustainable growth through provision of infrastructure improvements is supported.	Infrastructure delivery must be proportionate to each development
Bidwells on behalf of UEA re land at UEA Grounds Depot Site, Bluebell Road	Support	Regarding UEA. Policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery. The need to support sustainable growth through provision of infrastructure improvements is supported.	Infrastructure delivery must be proportionate to each development
Bidwells on behalf of UEA re land between Suffolk Walk and Bluebell Road	Support	Policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery. The need to support sustainable growth through provision of infrastructure improvements is supported.	Infrastructure delivery must be proportionate to each development

Bidwells on behalf of UEA re land north of Cow Drive	Support	Policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery. The need to support sustainable growth through provision of infrastructure improvements is supported.	Infrastructure delivery must be proportionate to each development
Bidwells on behalf of UEA re land adjoining the Enterprise Centre at Earlham Hall	Support	Policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery. The need to support sustainable growth through provision of infrastructure improvements is supported.	Infrastructure delivery must be proportionate to each development.
Bidwells on behalf of Abel Homes land south of Norwich Road, Hingham	Support	Policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery. The need to support sustainable growth through provision of infrastructure improvements is supported.	Infrastructure delivery must be proportionate to each development.
Hingham Parish Council	Comment	Developers should also be looking to contribute to improving and sustaining infrastructure beyond the boundary of the development to help to ease the burden on existing infrastructure and facilities.	Developers should contribute to infrastructure beyond the development site.
Hopkins Homes	Support	Policy should recognise that infrastructure provision must be proportionate to each development, based on a local need and not undermine delivery. The need to support sustainable growth through provision of infrastructure improvements is supported.	Infrastructure delivery must be proportionate to each development.

QUESTION 26

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 26 - Are there any topics which have not been covered that you believe should have been?
TOTAL NUMBER OF REPRESENTATIONS:	12
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	3 Support, 1 Object, 8 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Member of the public	Comment	Defences against flooding from the sea should also be considered given the important nature of the Broads.	Flood defences
Member of the public	Comment	Past performance should feed into future projects. NCC should not go ahead with any infrastructure projects until they correct and honestly report past failures e.g. NDR.	Past performance should inform the future.
NPS Property Consultants Ltd representing Norfolk Constabulary	Object	Requirements of Norfolk Constabulary should be included within the strategic infrastructure element of Policy 4. Norfolk Police have pressure on resources due to new development. On top of that identified in the Plan, further pressure has been identified in north Norwich. Need a new response facility to serve this area, close to the NDR. Would meet aspirations of Policy 2. Policy 4 should therefore include police infrastructure as part of the lobbying for timely improvements.	Increased strain on Police due to growth. Need to consider additional response facility in north Norwich.
Anglian Water Services Ltd	Comment	Include a policy which ensures that development proposals fully consider the risk of pollution to existing groundwater sources for public water supply. Number of groundwater sources and SPZs close to proposed developments in Aylsham, Cawston, Norwich, Wicklewood and Kirby Cane	Ensure proposals consider the risk of groundwater pollution.

Hingham Parish Council	Comment	Policy 4 has no mention of providing improvements to the pedestrian network for communities outside of Norwich. Nowhere in Hingham is there a pedestrian priority crossing point over the B1108 or any other road. Concern over lack of adequate public parking and parking for existing community buildings which are insufficient to support growth. A car park would bring together existing and future communities.	Improvements to pedestrian network and parking in Hingham.
Aylsham Town Council	Comment	There is nothing in the plan regarding connecting the market towns to Norwich and onward sites through long-distance all-weather cycle paths. This would appear to be an opportunity missed	Cycle paths connecting market towns to Norwich.
Redenhall with Harleston Town Council	Support	The Town Council supports Policy 4 especially the emphasis on "timely delivery".	
East Suffolk Council	Support	Support the approach in the Strategic Infrastructure Policy.	
Watkin Jones Group	Support	Support these objectives for creating a vibrant and inclusive area that is enhanced by new homes, infrastructure and environment.	
Highways England	Comment	Wind power should be considered for inclusion as it is a key element in sustainable energy delivery. Infrastructure to support the charging of electric cars.	Windfarms and EV charging infrastructure
Hingham Parish Council	Comment	Policy 4 has no mention of providing improvements to the pedestrian network for communities outside of Norwich. Nowhere in Hingham is there a pedestrian priority crossing point over the B1108 or any other road. Concern over lack of adequate public parking and parking for existing community buildings which are insufficient to support growth. A car park would bring together existing and future communities.	Improvements to pedestrian network and parking in Hingham.
Pigeon Investment Management Ltd	Comment	GNLP largely silent on how this strategic infrastructure will be delivered and, in some cases, it does not make provision for this required infrastructure. Wording in Policy 4 should be revised to indicate that proposals that assist the delivery of infrastructure improvements will be supported. Medical practice at Reepham can be readily expanded to accommodate growth through the allocation of the site at Land at Dereham Road, Reepham.	Suggested rewording of Policy 4.

QUESTION 27

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 27 - Do you support, object or have any comments relating to approach to affordable homes?
TOTAL NUMBER OF REPRESENTATIONS:	55 (44 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	11 Support, 13 Object, 31 comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
19864 Public	Comment	<ul style="list-style-type: none"> • Include environmental standards in proposed housing. • Affordable housing should exceed insulation standards and have low carbon impact in the future 	<ul style="list-style-type: none"> • Investigate new and proposed requirements that are being set via building regulations and standards that can be required by planning regulations in respect to low carbon, energy efficiency.
23082 Orbit Homes via David Lock Associates	Support	<ul style="list-style-type: none"> • support requirement to deliver different housing types • highlight ability of SGV, via development partners Orbit and Bowbridge, to commit to delivery of variety of housing types and tenures 	

20102 RJ Baker & Sons	Support	Support approach for provision of affordable housing	
20241 Public	Support	<ul style="list-style-type: none"> • Important to keep volume of affordable housing. • Too often the percentages are watered down 	
20623 Carter Jonas LLP + 22260 Taylor Wimpey Strategic Land via Carter Jonas LLP (Ref GNLP 0172 & 0284R)	Object	<ul style="list-style-type: none"> • Note requirement for affordable housing, and that this is lower for Norwich • However, strategic extensions, new settlements & Garden Villages will not normally provide policy compliant levels during the initial phased due to costs of providing primary infrastructure (roads, drainage, strategic landscaping etc) in advance of housing development. • Unlikely and undesirable to increase affordable housing requirements at later development phases to address under-delivery in initial phases. • Strategic extensions and garden villages that are reasonable alternatives in Wymondham will not meet affordable housing requirements – other sites should be identified – such as GNLP0320. • Please note north of Gonville Hall Farm, development is under construction and delivering policy compliant levels of affordable housing. 	<ul style="list-style-type: none"> • Investigate the feasibility of large urban extensions and new settlement proposals providing policy compliant levels of affordable housing in conjunction with upfront infrastructure.
20642 Noble Foods Ltd – Farms via Carter Jonas LLP	Comment	<ul style="list-style-type: none"> • note affordable housing requirements and that requirement is lower in Norwich. • GNLP3035 would deliver affordable housing for local people 	
20677 CPRE Norfolk +	Comment	<ul style="list-style-type: none"> • Support affordable housing policy within Policy 5 • Linking affordable housing to overall housing targets is potentially damaging as it is reliant on large housing targets which developers can use to justify more expansive building. 	

<p>20795, 21482, 21854 Hempnall PC + 22666 Saxlingham Nethergate PC + 23114 Salhouse PC</p>		<ul style="list-style-type: none"> • Ideally affordable housing would be provided where needed as a stand-alone provision, not connected to developer’s targets. • Support rural exception sites to supply needed local affordable and social housing. • Where affordable housing is expressed as a percentage it is essential the requirements are followed when progressing applications for housing on sites of 10+ dwellings. • Hope that government changes policy on viability tests to make them more transparent, making it harder to evade responsibility to develop affordable houses. • History of poor delivery of affordable homes needs to stop • (Salhouse PC also have this comment) developers with planning consent based on a percentage of affordable housing should be legally obligated to deliver it even if it leads to a loss 	
<p>20976 Public</p>	<p>Support</p>	<ul style="list-style-type: none"> • Ensure Policies are stuck to (don’t subscribe to “something is better than nothing”) • Mix types, sizes and adaptable needs are an essential requirement. • What is definition of “major” which requires 20% to be adaptable? – should be universal. • “Future proofing” housing. Space Standards. Having 75% leaves 1 in 4 above or below nationally described standards, 100% is essential. • Evidence about type and mix is stated to be revisited in 2020, which is now 	<ul style="list-style-type: none"> • Inclusion of the Nationally Described Space Standards in the GNLP is an ongoing consideration.
<p>20992 Public</p>	<p>Comment</p>	<p>40 years ago I considered purchasing a new build small property, essentially an upmarket bedsit which was ideal – should something like this be considered for single person accommodation?</p>	
<p>21185</p>	<p>Comment</p>	<ul style="list-style-type: none"> • Support commitment and target of 33%. • Targets should become enforceable given poor delivery of such targets. 	

Saving Swainsthorpe Campaign			
21188 Hopkins Homes, Persimmon Homes & Taylor Wimpey via Bidwells + 21212 Kier Living Eastern via Bidwells	Comment	<ul style="list-style-type: none"> • Policy needs flexibility should unforeseen circumstances arise to threaten viability of a site or where there are changes of most up-to-date evidence of need • Policy should delete reference to words 'at least' as affordable housing requirements should not be expressed as minimums 	
21271 Larkfleet Homes	Comment	<ul style="list-style-type: none"> • Broadly welcome and support Housing Policy and it's wording • Must be noted the policy is silent on support for affordable housing sites on Entry Level and Rural Exception sites. Both are supported and encouraged by NPPF 2019 	<ul style="list-style-type: none"> • Consider the need for reference to Entry Level and Rural Exception sites.
21318 Lanpro Services via Stephen Flynn + 21406 Glavenhill Ltd via Stephen Flynn	Object	<ul style="list-style-type: none"> • No justification or viability information provided to support increase from 28% (2017 SHMA) to 33% affordable housing unless there is compelling new evidence • Lanpro object to student accommodation schemes being asked to provide a commuted sum equivalent to amount of affordable housing expected from a general housing development. Would be difficult to assess without alternate housing scheme being drawn up to take account of individual site constraints and viability/ market factors. What will be the mechanism for agreeing this? • Elderly C3 accommodation should not require onsite affordable housing provisions. Will stifle delivery of sheltered housing accommodation. Instead be required to provide a commuted sum in lieu of provision 	
21578, 23042 & 23044	Support/ Comment	<ul style="list-style-type: none"> • Support policy regarding residential proposals being for all sectors of community and providing a good quality of life for all. 	

Hingham PC		<ul style="list-style-type: none"> • Raise concerns regarding location of social housing within developments, often family homes located on less desirable plots with rear gardens adjacent to the main road, meaning children are exposed to increased noise and air pollution whilst playing. 	
21628 Aylsham TC	Comment	<ul style="list-style-type: none"> • Experience shows a need to remove wiggle room from 33% figure. • Like to see addition for development to be 'tenure blind' 	
21665 Our Place via Lanpro Services Ltd	Object	<ul style="list-style-type: none"> • Object to imposition of 28% affordable housing for allocations GNLP3054 & 2114 in the absence of supporting viability evidence. • Willing to contribute to any reviews on viability evidence to enable delivery of affordable housing. 	
21696 Persimmon Homes (Anglia)	Comment	<ul style="list-style-type: none"> • Would support an appropriate housing requirement uplift to ensure delivery of full affordable housing need to compensate for lack of delivery on small and unviable sites. It would also increase competition to improve affordability of market housing. • Proposed higher affordable housing percentage could affect viability of some sites. In these cases, the policy should allow flexibility on percentage and tenure with reasonable justification without need for rigorous open book assessments which create uncertainty, expense and delays. • SHMA 2017 identified 28% so what is the justification for 33% in areas other than Norwich? 	
21752 Brown & Co	Support	<ul style="list-style-type: none"> • Support approach to affordable housing • Clarion Housing well positioned to provide this, believe the issue is about general access to housing, not just provision of affordable housing. • Honingham Thorpe would provide high quality, energy efficient affordable housing throughout development 	
21798 Barton Willmore	Comment	<ul style="list-style-type: none"> • Welcome acknowledgement that high costs impact viability and ability to deliver 33% affordable housing, this should be extended to Norwich Urban Area • Acknowledged that this flexible approach would need supporting from viability evidence 	

21908 Home Builders Federation	Comment	<ul style="list-style-type: none"> • Policy should delete reference to words ‘at least’ as affordable housing requirements should not be expressed as minimums • Elderly C3 accommodation should not require onsite affordable housing provisions. Will stifle delivery of sheltered housing accommodation. Instead be required to provide a commuted sum in lieu of provision • Interim viability has not considered specific typology for retirement homes which has a specific set of needs (e.g. higher proportion of floorspace) – recommend specific typology for special older people’s accommodation is tested. 	<ul style="list-style-type: none"> • Ongoing evidence gathering – specifically, the inclusion of a typology for retirement housing in the Viability Study.
21915 Public	Object	<p>Plan should include, as a priority;</p> <ul style="list-style-type: none"> • Getting homeless, potentially dying young people off street and into small warm dry eco habitations • Rehouse those suffering in damp squalid rip-off rent conditions 	
21949, 22911, 22943, 22963 & 22998 UEA Estates & Buildings via Bidwells	comment	<ul style="list-style-type: none"> • GNLP0133-C & E are proposed for purpose-built student accommodation on the UEA Campus, so shouldn’t be required to provide affordable housing. • Seek to delete affordable housing requirement from preferred allocation’s wording as GNLP recognises delivery of PBSA within UEA campus does not need to provide affordable housing (whereas any outside of UEA campus does) 	
21998 South Norfolk Green Party	Support	<ul style="list-style-type: none"> • Support affordable housing policy • essential the requirements are followed when progressing applications for housing on sites of 10+ dwellings. • Ideally affordable housing would be provided where needed as a stand-alone provision, not connected to developer’s targets. • Support rural exception sites to supply needed local affordable and social housing. • Developers use viability assessment to argue for lower affordable housing provision – should be required to show they have explored options for redesigning schemes that do not impact on the level of community benefits 	

		to be provided. These should be open to public scrutiny and published online	
22025 Mulbarton PC	Comment	<ul style="list-style-type: none"> Affordable/social housing should be stand-alone to meet local need 	
22165 Norwich Liberal Democrats	Support	<ul style="list-style-type: none"> Agree with 33% (+28% in City centre) and requirement for accessible and adaptable housing to provide 20% for major housing developments 	
22286 Hugh Crane Ltd via Savills	Object	<ul style="list-style-type: none"> No evidence to justify 33% requirement – evidence base and policy need updating to reflect identified need. 	
22334 & 22371 Pigeon Investment Management Ltd via Pegasus Group	Comment	<ul style="list-style-type: none"> Policy requires 20% to be to Building Regulation M4(2)(1) standard for major housing developments. This implies developments of 10+ need to provide upwards of 2 dwellings to meet the standard however, there is no evidence that such a high percentage will be required over the life time of the plan. Recognised many affordable homes are built to such a standard, this is additional requirement on developers which will impact on cost of new homes affecting their accessibility. 	
22417 Norwich Green Party	Object	<ul style="list-style-type: none"> Object, want to see 28% Norwich city figure increased to 33%. Figures in SHMA give 38.2% overall affordable housing need for NCC area. Substantial waiting list in Norwich for social housing. Higher brownfield development costs should be off-set by external government funding e.g. HIF. In case of Anglia Square, £15m of HIG money has been secured, consider this has been offset by developer wasting money on expensive project which includes 20 storey tower. History of under-delivery of affordable homes in GN area despite Council's adoption of a higher than necessary housing target in JCS. Viability has been used by developers to avoid meeting the targets. 	

		<ul style="list-style-type: none"> • Meanwhile they develop on countryside in SN & Broadland at a price out of reach of many people. • Increasing housing target has not worked to provide sufficient affordable housing. 	
22433 Gladman Developments	Comment	<ul style="list-style-type: none"> • Support principle of improving affordable housing across GN area and need to identify appropriate target for different built environments that reflect local circumstance. • Council needs to demonstrate clear, robust, up-to-date viability assessment that this would be viable on majority of schemes. Endorse related HBF comments. • Advocate need for flexibility within policy dependant on site-specific circumstances to ensure delivery 	
22521 Broadland Green Party	Comment	<ul style="list-style-type: none"> • Support policy for 33% affordable housing. • Schemes needed, or national policy modified, to ensure developers do not avoid this requirement. • Support Cambridge-Norwich tech corridor but needs social housing schemes to ensure technicians, veterinary nurses and support staff are able to afford to live in area. 	
22677 La Ronde Wright Ltd	Support	Support policy except self/custom-build homes	
22731 Halsbury Homes Ltd via Pegasus Group	Comment	SHMA identifies 28% need for affordable housing – why is it 33%? Consider a variable affordable requirement, including on market locations, tenure mix and infrastructure requirements to provide flexibility and maintain viability	
22763 Public	Object	<ul style="list-style-type: none"> • Concerned proposals will fall short in implementation, worsening shortage to meet current need. • Viability Assessments used by developers to reduce affordable housing – e.g. Broadland planning approval 20160498 reduced to 15% for first phase, this was checked by Council appointed expert who failed to note the floor 	

		<p>areas for sale were less than those used in calculation of construction costs. Both expert and Broadland stand by decision, expert stating sales values use internal floor areas and construction values use external floor areas. This destroys any confidence in planning system and Draft Plans.</p> <ul style="list-style-type: none"> • Do not believe councils should consider viability for outline planning applications. Developers will carry out financial assessment which dictate the residual value of land, rather than excessive land values dictating level of affordable housing. • Broadland and SN have reduced affordable housing targets from 33% to 28% based on 2017 SHMA evidence. This has not been debated by the council, nor have the development documents been amended • GNLP assessment of SHMA concluded 33% is still needed for Broadland and SN, despite this there are at least 2 applications in Broadland proposing 28% affordable housing without a Viability Assessment, presumably based on prior discussions with officers. • How is it possible for officer representatives from Broadland and South Norfolk on the GNDP to be supporting two opposing interpretations of the SMHA report for affordable housing requirements? • I have contacted both Leaders (in 2010) of the mentioned councils; Mr Fuller confirms he is happy for Mr Vincent to reply on behalf of both councils as he is chair of GNDP. As of today and despite a reminder, the only response from Mr Vincent has been that he would look into the matter. 	
22780 Whitbread PLC via Savills	Comment	<ul style="list-style-type: none"> • Seek to amend first bullet point for affordable housing to include <u>“...and subject to viability testing in line with the NPPF”</u> at the end • Also seek to amend last bullet point of section for PBSA to be “...make provision for the delivery of a quantum of affordable housing that would be expected if the site were developed for general needs housing, <u>unless the site has already been allocated for purpose built student accommodation or/and where part of the broader development scheme would deliver market housing and associated affordable housing as part of the</u> 	<ul style="list-style-type: none"> • Policy drafting – specifically, the use of ‘subject to viability testing in line with the NPPF’ as regards affordable housing, and clarify obligations as to purpose build student accommodation.

		<p>development. Such provision may be made offsite through a commuted sum as set out in supplementary planning documents”</p> <ul style="list-style-type: none"> • Comments above made with regard to delivery of viable development in para 57 of NPPF 	<ul style="list-style-type: none"> • Considerations of how to take account of viability assessments at plan-making and application stages (para 57 of the NPPF),
22807 Landowner via Pegasus Group	Object	<ul style="list-style-type: none"> • Object to at least 33% as SHMA suggests 28% for the housing requirement at the time. • Now the housing requirement has increased, this figure should be less than 28%. • Seems to be serious lack of evidence to justify the higher figure, raising concern about appropriateness of strategy due to not considering appropriate alternatives. • Figure should be reduced to reflect the evidence. • Inclusion of ‘at least’ before the percentage should be omitted as it raises expectations that this is a minimum figure. • Where there are site specific reasons, the planning officers would have less flexibility to make a planning judgement 	<ul style="list-style-type: none"> • Ongoing evidence gathering – specifically, evidence in the Strategic Housing Market Assessment (SHMA) for setting the overall affordable housing requirement at 33% rather than 28%.
22885 & 23025 Abel Homes via Bidwells + 23143 Hopkins Homes via Bidwells	Support	Support principle but policy should, as per JCS, recognise there may be a material change in circumstance that may warrant submission of a viability assessment	
22924 Barratt David Wilson Homes via Savills	Object	<ul style="list-style-type: none"> • 28% requirement is based on SHMA 2017 which identifies 11,030 affordable homes required over 21-year period, or 526 (rounded up) p.a. out of total requirement of 1,881 (rounded up) dpa. • GNLP proposes 2,217, 17.8% (226dpa) higher than annual need identified in SHMA. 	

		<ul style="list-style-type: none"> • 28% applied to full planned provision of 2,217 dpa would deliver 621 (rounded up) affordable housing p.a. If 10% build on sites of less than 10 dwellings, 559 (rounded up) would still be delivered. If 33% applied to 70% of sites, 28% to 20% of sites and 10% of sites exempt, 637 (rounded up) p.a would be delivered, some 20+% (110 dpa) more than required/justified. • No evidence/justification for 33% requirement • Given lack of evidence it is particularly unreasonable to not put forward an alternate approach • 'at least' needs clarifying 	
22974 Barratt David Wilson Homes via Pegasus Planning Group	Object	<ul style="list-style-type: none"> • 33% requirement is unjustified, 28% identified in SHMA • This raises concerns about appropriateness of strategy in not considering alternatives • Inclusion of 'at least' before the percentage should be omitted as it raises expectations that this is a minimum figure. • Where there are site specific reasons, the planning officers would have less flexibility to make a planning judgement 	
23049 Norfolk Homes Ltd via Cornerstone Planning Ltd	Comment	<ul style="list-style-type: none"> • Why 33% when SHMA identifies 28%? Implication is this will make up shortfall from developments below 10 dwellings – essentially cross-subsidising perceived shortfall through major housing schemes. • Should be lowered to 28% to reflect evidence – currently unjustified 	
23194 Orbit Homes via Armstrong Rigg Planning	Comment	<ul style="list-style-type: none"> • Consider approach appropriate but recommend "at least" is removed, policy should not seek to establish requirements as minimums as does not provide certainty for decision maker or applicant. • 10% of affordable homes for affordable home ownership is ascribed to NPPF policy but this is incorrect. NPPF requires 10% of all homes on major developments to be for affordable home ownership, not 10% of affordable home contribution. • 10% of all homes is equal to 30% of tenure split at 33% affordable housing, or 36% of tenure split at 28% affordable housing. 	<ul style="list-style-type: none"> • Policy drafting – specifically, the use of 'at least' for affordable housing percentages. • National guidance – specifically, para 64 of the NPPF that 10% of homes should be for affordable home ownership, and also the exemptions to the 10%

		<ul style="list-style-type: none"> • 2 possible exceptions in NPPF; • if it would exceed level required – this wouldn't apply in Greater Norwich • if it significantly prejudices ability to meet affordable housing needs of specific groups – may be argument to provide lower proportion of affordable home ownership on this basis, but GN authorities would need to provide detailed evidence to justify this. • NPPF also includes exemption for specific sites for Build to Rent homes, specialist accommodation, self/custom build and 100% affordable housing developments. There are important exemptions which need including in Policy 5. 	<p>requirement that include Build to Rent, purpose built accommodation for students or the elderly, self-build, and rural exception sites.</p>
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QUESTION 28

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 28 - Do you support, object or have any comments relating to the approach to space standards?
TOTAL NUMBER OF REPRESENTATIONS:	28 (19 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	5 Support, 4 Object, 19 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
20084 Public	Comment	<ul style="list-style-type: none"> • No mention of space for nature • All kinds of life need space within the built-up environment • Trees are needed for pollution 	
20851 Welbeck Strategic Land III LLP via Bidwells + 22637 M Scott Properties Ltd via Bidwells	Comment	<ul style="list-style-type: none"> • Support general principle of providing development that adheres to space standards. • Policy should be flexible to ensure site specific issues, needs and finances can be considered e.g. may be locations where there is a need for homes below space standards 	
20977 Public	Support	<ul style="list-style-type: none"> • Essential • What about the 1 in 4 that slipped through? 	
21189 Hopkins Homes, Persimmon Homes	Comment	<ul style="list-style-type: none"> • PPG requires introduction of space standards where there is robust evidence that they are needed. Evidence in the plan indicate 75% homes in GN area were 	

<p>& Taylor Wimpey via Bidwells + 21213 Kier Living Eastern Ltd via Bidwells + 23144 Hopkins Homes via Bidwells</p>		<p>delivered to necessary standards 2016-18 – is there a need for strict policy adherence</p> <ul style="list-style-type: none"> • Policy should be flexible to allow delivery of homes below standards where they are well designed and meet specific needs 	<ul style="list-style-type: none"> • Policy drafting – consider if the policy could be applied flexibly if circumstances where homes are well-designed and meet specific needs.
<p>21275 Larkfleet Homes</p>	<p>Comment</p>	<ul style="list-style-type: none"> • Broadly welcome strive to homes for all • space standards are nationally recognised and continue to be supported 	
<p>21320 Lanpro Services via Stephen Flynn & 21407 Glavenhill Ltd via Stephen Flynn</p>	<p>Comment</p>	<p>Please see our answers to questions 23 and 24 setting out our concerns regarding the delivery of infrastructure to meet the needs of small rural cluster village sites. Our conclusion is that dispersal to small rural cluster villages outside of the old NPA area is not sustainable.</p>	
<p>21700 Persimmon Homes (Anglia)</p>	<p>Object</p>	<ul style="list-style-type: none"> • Insufficient evidence to suggest homes slightly below national space standards are not meeting a need and demand for housing of this size. • Council’s approach of collating evidence of the size of dwellings completed does not reflect need as set out in NPPG. • Evidence base should take account of market indicators such as quality of life impacts or reduced sales where standards are not being met. • No evidence that size of homes affects need or ability to sell homes. Council refer to assessment of 245 homes in GN area which shows 75% homes have achieved NDSS GIA requirements 	

		<ul style="list-style-type: none"> • Evidence base fails to take account of market information reflecting customer satisfaction for new homes, by neglecting this the council fails to demonstrate a need to adopt an internal space standard, as required by NPPF (footnote 46) • Adopting space standards would worsen affordability and reduce number of homes delivered. • If needed, more appropriate to require a proportion of new homes be built to NDSS to enable continued delivery of well-designed, smaller, affordable units to meet local need. 	<ul style="list-style-type: none"> • Seek evidence to understand how well-designed homes, just below the NDSS, command high levels of customer satisfaction. • Seek evidence to recognise the risk to the deliverability of new homes by applying NDSS.
21754 Brown & Co	Support	<ul style="list-style-type: none"> • support approach to space standards • Clarion believe high quality space is imperative to ensuring a good quality of life 	
21909 Home Builders Federation	Object	<ul style="list-style-type: none"> • Need to ensure necessary evidence on development impact and viability is provided as set out in PPG • Concern strict adherence could limit well designed, affordable homes that better meet needs and budget of some. • There must be clear evidence a significant proportion of new homes are coming forward below standards. 	<ul style="list-style-type: none"> • Seek evidence to recognise the risk to the affordability of new homes by applying NDSS.

		<ul style="list-style-type: none"> If evidence is provided, we recommend policy allows flexibility where smaller houses are well designed and meet identified accommodation needs of local households. 	
21950, 22912, 22944, 22964 & 23000 UEA Estates & Buildings via Bidwells	Comment	Only applicable to residential dwellings, not PBSA's.	
22173, 22335, 22372 & 23170 Pigeon Investment Management Ltd via Pegasus Group	Comment	<ul style="list-style-type: none"> NDSS not currently mandatory so council's wishing to apply them need to accord with tests of NPPF 2019 para 127f and footnote 46 requiring it's use to be justified Will also need to demonstrate costs of implementing have been subject to viability appraisal Council's NDSS Study (Aug2019) in Appendix B of Interim Viability Appraisal (2019) has not identified harm arising from dwellings not meeting NDSS, nor that they aren't selling or are considered inappropriate. Introducing NDSS will impact cost of construction thus affecting cost to customers, as well as density of development on sites 	<ul style="list-style-type: none"> Investigate that the evidence for requiring NDSS accords with NPPF 2019 para 127f and footnote 46.
22287 Hugh Crane Ltd via Savills	Comment	<ul style="list-style-type: none"> Acknowledge aspiration to incorporate NDSS into GNLP but evidence base needs to meet necessary tests for such a policy. Reviewing evidence base, more justification is needed. 	
22678 Trustees of land via La Ronde Wright Ltd	Support	Support policy with exception for section on Self/Custom Build Homes	
22886 & 23026 Abel Homes Via Bidwells	Support	<ul style="list-style-type: none"> Support general principle of providing development that adheres to space standards. Policy should be flexible to ensure site specific issues, needs and finances can be considered e.g. may be locations where there is a need for homes below space standards 	

		<ul style="list-style-type: none"> • provision of space standards for internal room size is supported, but council should not place restrictions on developer in relation to storage space. • Developers need flexibility to react to buyer/market demands whilst operating within overall minimum space standards regime 	
22925 Barratt David Wilson Homes via Savills	Object	<ul style="list-style-type: none"> • BDW concerned impact on cost to purchasers has not been properly considered • The Study skips lightly over potential impact on sales prices, stating in the conclusion that the change is ‘unlikely’ to push down developer profit to an unreasonable level, and it is ‘possible’ to recoup costs in higher sales values or reflected in land price. This has not reference or justification, indicating the GNDP does not have the required justification of need (as per the PPG – ref. ID: 56-020-20150327). • Alternative approach text stated minimum space standards are ‘considered necessary’, implying that a different, considered, conclusion could be reached. • Text also says standards are necessary for quality of life, implying those living in houses not built to this standard do not have a good quality of life. 	<ul style="list-style-type: none"> • Consider whether the approach to evidence gathering for applying NDSS complies with the NPPG – consider need for starter homes, affordability, and a transitional period for introducing NDSS. (PPG – ref. ID: 56-020- 20150327).
22975 Barratt David Wilson Homes via Pegasus Planning Group	Object	<ul style="list-style-type: none"> • Lack of evidence regarding impact on deliverability. • NDSS and Interim Viability Study make unsubstantiated assumptions and do not provide level of evidence needed by NPPF. • Blanket requirement doesn’t allow for site-specific considerations 	

QUESTION 29

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 29 - Do you support, object or have any comments relating to the approach to accessible and specialist housing?
TOTAL NUMBER OF REPRESENTATIONS:	21 (14 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	5 Support, 1 Object, 15 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
20978 Public	Support	Essential	
21000 Public	Comment	<ul style="list-style-type: none"> • Needed as currently appears to be a shortfall • Need to be of standard for independent living with community support facilities (shop, hairdressers, bar etc) and support within development • Seen an example with development consisting of independent living, care home, nursing home integrated with beautiful gardens etc 	
21581 & 23046 Hingham PC	Comment	<ul style="list-style-type: none"> • Doesn't account for/ address needs of elderly who reside within general accommodation e.g. those that may wish to downsize to a bungalow, those who wish to grow old within their own home but need support. 	<ul style="list-style-type: none"> • Investigate evidence for specialist supported housing for the elderly, as well as market demand for single storey housing for older people wishing to 'downsize'. More information likely to become available as part of ongoing

		<ul style="list-style-type: none"> All development should address need for good access to services and infrastructure should be sufficiently improved to provide this (pedestrian crossing, adequate footways) 	evidence gathering for the Strategic Housing Market Assessment (SHMA).
21755 Brown & Co	Support	<ul style="list-style-type: none"> Support approach Clarion provide specialist LiveSmart Housing; delivering facilities management & intensive housing management for older residents. Vital for older residents to remain in community, specialist housing will be provided at heart of Honingham Thorpe, with relevant infrastructure nearby 	
21910 Home Builders Federation	Comment	<ul style="list-style-type: none"> welcome support in policy to supporting specialist accommodation for elderly. Essential council establishes the amount of specialist accommodation being sought. Without clarity, decision makers will not know the need for such schemes and whether more is needed. Suggest council works with specialist providers to identify suitable sites to meet specific needs of older people. PPG does not require allocations to be made but older people's housing needs to be in sustainable locations close to services 	
22134 M Scott Properties Ltd via Strutt & Parker LLP	Comment	<ul style="list-style-type: none"> Support need to provide suitable homes in right locations. Policy 5 should encourage a range of properties to suit variety of needs, and specific allocation within site specific policies, and land should be set aside for specialist housing. This ensures a variety of housing comes forward to meet diverse need of older people as set in PPG and provide choice (age-restricted general market housing, retirement living/sheltered housing, extra care housing/housing-with-care) 	<ul style="list-style-type: none"> To consider specific allocations for specialist housing for older people – including, age-restricted general market housing, retirement living or sheltered housing, extra care housing or housing-with-care, and residential care homes and nursing homes.

		<ul style="list-style-type: none"> • To ensure variety of housing the plan should make specific allocations instead of generic house mix policy. • recent interim findings of Inspector following examination of Suffolk Coastal Local Plan advises to amend text to set out how housing needs of older people will be addressed through provision of housing and to boost supply of this type of housing. • So we encourage council to consider allocating specific sites for specialist accommodation. • We propose approx. 24 single storey housing at Land between Shelfanger and Mount Street Diss to meet need. • Currently retirement housing dominated by handful of providers that typically produce flatted developments for those predominantly 75+ years of age, resulting in lack of choice and high inflated prices. This leaves no alternative housing options except making costly adaptations to existing property. • Providing such accommodation facilitates downsizing, freeing up more housing and reducing pressure on LA's. 	<ul style="list-style-type: none"> • The proposal for 24 single storey homes at Land between Shelfanger and Mount Street Diss will be considered through the Sites Plan element of the GNLP.
<p>22142 Cygnet Care Ltd via CODE Development Planners Ltd</p>	<p>Comment</p>	<ul style="list-style-type: none"> • Construction of 20% of homes on major development proposals to Building Regulation M4(2)(1) standard (or any successor) will not meet the increasing need for extra care unit/other specialist elderly accommodation across LP area. • Plan recognises need for additional care units but does not make any formal allocations to meet the need over the period. • Formal allocations should be made to meet this need within the GNLP • At very least, Policy 5 should ensure that the best locations for specialist accommodation are not restricted by policies only allowing development within settlement boundaries. • Site GNLP0280 is submitted for a Use Class C2 facility including care home and extra bungalows (before client's involvement 	

		<p>was previously for 40 residential dwellings – appended site location plan also included – may also be boundary change)</p> <ul style="list-style-type: none"> Existing site has Cresta Lodge, but this is becoming unfit for purpose with small bedrooms (some without en-suite) small bathrooms and limited communal/social space. To do nothing is not an option. We are proposing to redevelop. In accordance with paragraph 35 of the Framework, the regulation 18(c) version of the GNLP (regarding the provision of specialist accommodation for older people) is not positively prepared (as the local plan does not seek to meet, as a minimum, the need for this type of accommodation) and is not effective. 	<ul style="list-style-type: none"> The proposal for GNLP0280 in Poringland as a site for a care home and extra bungalows will be considered through the Sites Plan element of the GNLP.
22156 Pigeon Investment Management Ltd via Pegasus Group	Comment	<ul style="list-style-type: none"> Central Norfolk SHMA identifies need for 3,909 aged 75+ to be in residential institutions over period 2015-1036 2014 institutional population projections identify increase of 2,060 such people within GNLP area over period 2015-1038 In period 2015-2018 234 bed spaces were built for this purpose leaving need for 1,826 bed spaces 2018-36. Number of dwellings not being released due to lack of provision is 987 (using calculation in PPG (63-016a) Therefore necessary to make provision for 1,826 bed spaces or increase housing requirement by 987 homes. 	<ul style="list-style-type: none"> Investigate unmet need for accommodation for older people, as well as ongoing Strategic Housing Market Assessment (SHMA) evidence gathering. Ensure necessary strategic and site specific policies are included. investigate if due to a lack of 1,826 bed spaces in care institutions for over 75s the number of dwellings needs to increase by 987 homes, based on PPG (63-016a).
22166 Norwich Liberal Democrats	Support	Support policy addressing need for homes in all sectors of community	

22172 Pigeon Investment Management Ltd via Pegasus Group	Comment	Irrelevant to section (Discusses the need to increase overall housing number due to increased need and City Deal – added to soundness spreadsheet) – should be in Policy 1?	
22174, 22336, 22373 & 23171 Pigeon Investment Management Ltd via Pegasus Group	Comment	<ul style="list-style-type: none"> • Policy implies any development of 10+ dwelling need to provide 2+ accessible properties to allow people to stay in their homes for longer • No evidence provided for such a high percentage. • Policy will impact cost of new homes and accessibility within the marker. • Requirement for such housing should be specific to individual allocations 	
22434 Gladman Developments	Comment	<ul style="list-style-type: none"> • supportive of a policy relating to this type of housing provision • PPG states the need for robust justification for these policies and that viability considerations have been given • Wheelchair user dwelling require more space requirements and so due consideration is required 	
22638 M Scott Properties Ltd via Bidwells	Support	<ul style="list-style-type: none"> • Approach is supported • Policy should recognise consideration should be given to demographics of the area e.g. bungalows may be identified after a demographic assessment within an area. 	
22679 La Ronde Wright Ltd	Support	Support Policy	
22701 M Scott Properties via Strutt & Parker LLP	Comment	<ul style="list-style-type: none"> • Draft strategy's recognition of need for provide suitable homes in right locations is supported. • Policy should encourage a range of properties to suit variety of need and site specific policies should have specific allocation/requirements, including care homes. 	

		<ul style="list-style-type: none"> • Allocations such as GNLP2136 should be encouraged to ensure variety of accommodation to meet diverse needs (age-restricted general market housing, retirement living/sheltered housing, extra care housing/housing-with-care) • To ensure variety of housing the plan should make specific allocations instead of generic house mix policy. • recent interim findings of Inspector following examination of Suffolk Coastal Local Plan advises to amend text to set out how housing needs of older people will be addressed through provision of housing and to boost supply of this type of housing. • So we encourage council to consider allocating specific sites for specialist accommodation. • GNLP2136 proposes a 90 bed C3 care block with additional specialist accommodation for older people (circa 30 units) is also proposed and 20% dwellings will be single storey properties. • This will enable downsizing, freeing up properties • Currently retirement housing dominated by handful of providers that typically produce flatted developments for those predominantly 75+ years of age, resulting in lack of choice and high inflated prices. This leaves no alternative housing options except making costly adaptations to existing property. • Providing such accommodation facilitates downsizing, freeing up more housing and reducing pressure on LA's. 	<ul style="list-style-type: none"> • Investigate the wording of Suffolk Coastal Local Plan to: a) policy wording that facilitates larger allocations to consider a housing mix that partly addresses the needs of older people; and, b) for strategic policy to cross-reference which allocations specifically address the needs of older people.
<p>22976 Barratt David Wilson Homes via Pegasus Planning Group</p>	<p>Object</p>	<ul style="list-style-type: none"> • concerns for impact these requirements will have on viability of developments. • 20% of homes on major developments to building regulation M4(2)(1) will add costs which, in some instances, may be unviable with policy compliant percentage of affordable housing. 	<ul style="list-style-type: none"> • Investigate in the Viability Study the requirement for 20% of homes on major developments to meet building regulation M4(2)(1).

		<ul style="list-style-type: none">• Should amend wording to allow for scenarios when it may not be possible to achieve where viability issues are a material concern.	
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QUESTION 30

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 30 - Do you support, object or have any comments relating to the approach to Gypsies and Travellers, Travelling Show People and Residential Caravans? To help to meet long term need, this consultation specifically invites additional sites for Gypsies and Traveller accommodation, either on new sites or as extensions to existing sites.
TOTAL NUMBER OF REPRESENTATIONS:	3
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	3 Support, 0 Object, 0 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
21756 Brown & Co	Support	Support this approach to gypsies, travellers, travelling show people and residential caravans	Identification of sites for Gipsy and Traveller accommodation.
22522 Broadland Green Party	Support	Support need for additional sites for gypsy and traveller accommodation	
22680 La Ronde Wright Ltd	Support	Support policy	

QUESTION 31

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 31 - Do you support, object or have any comments relating to the approach to purpose-built student accommodation?
TOTAL NUMBER OF REPRESENTATIONS:	13 (8 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	6 Support, 3 Object, 4 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
21322 Lanpro Services via Stephen Flynn	Object	see response to Q27 (Object to student accommodation schemes being asked to provide commuted sum equivalent to amount of affordable housing as if it was general housing)	Consideration of City Council Affordable Housing SPD and NPPF (para. 64).
21408 Glavenhill Ltd via Stephen Flynn	Object	See response to Q27 (Object to student accommodation schemes being asked to provide commuted sum equivalent to amount of affordable housing as if it was general housing)	
21757 Brown & Co	Support	<ul style="list-style-type: none"> • Support approach • concerned impact of large numbers of student accommodation have upon local communities, particularly outside term-time. • Highlight that whilst this counts toward 5 year housing land supply it does little to provide for local people and meet local need 	

<p>21951, 22913, 22945, 22965, 23001 UEA Estates & Buildings via Bidwells</p>	<p>Support</p>	<ul style="list-style-type: none"> • support policy 5's support for PBSAs in accordance with UEA DFS. • Support PBSA within UEA campus should not provide affordable housing • Remove affordable housing provision for GNLP0133-C&E 	<ul style="list-style-type: none"> • Consider the policy position as to affordable housing contributions for purpose-built student accommodation, and specifically in regard to GNLP00133-C and GNLP00133-E.
<p>22094 Watkins Jones Group</p>	<p>Object</p>	<ul style="list-style-type: none"> • Would benefit from increased flexibility with affordable housing requirement for PBSA's • Support need to provide PBSA's at multiple price point if HEI's are to continue attracting students from a range of backgrounds • Have experience of similar policy impacts on PBSA delivery (e.g. in London) and delivery of PBSAs have significantly contracted in these areas. • Lack of competition and supply is projected to increase rental growth in these areas. • NCC's report on PBSA (Nov 2019) should help inform policy – report notes PBSA not required to provide affordable housing, but a commuted sum is encouraged to mitigate loss and allow for off-site provision. • Recommend council commissions further analysis before applying policy which may negatively impact PBSA provision. • If there is a justifiable requirement then it is recommended that; • reduced level of affordable provision is justified via viability assessment, and 	<p>Consider the need for further evidence to underpin the policies and requirements of any site allocations.</p>

		<ul style="list-style-type: none"> • may accept reduced levels where developers deliver other significant and substantial regeneration benefits. • A more permissive approach, where an uplift in PBSA delivery can be sustained, will ensure better balance of supply and demand to help with price • 10% affordable home ownership is not applicable to PBSA as it is rented and would oppose NPPF which states student accommodation should be exempt. 	
22155, 22337, 22374 Pigeon Investment Management Ltd via Pegasus Group	Comment	<ul style="list-style-type: none"> • 2014 based projections assumes student population to increase by 3 per annum. • Draft Plan indicated expected expansion in UEA from 15,000-18,000 in next decade (300 p.a.) • Increased migrations is not taken into account in projections • Increased student number will impact housing need requiring more housing allocations • It is considered that the requirement for the delivery of adaptable and specialist accommodation should be specific to individual allocations which will ensure that the needs can be met across the GNLP area and that these will be met at appropriate locations in close proximity to services and facilities. 	Consider specific site allocations for purpose built student accommodation as part of the Sites Plan element of the GNLP.
22681 La Ronde Wright Ltd	Comment	Support policy	

QUESTION 32

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 32 - Do you support, object or have any comments relating to the approach to Self/Custom-Build?
TOTAL NUMBER OF REPRESENTATIONS:	27
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 11 Object, 15 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Brown and Co	Support	Support this approach. Site at Honingham would provide fully serviced self-build plots.	None
Strutt and Parker LLP submitted twice, for site 2136 [22792 and 22702] and once for 0291/0342 both on behalf of Scott Properties Ltd	Object	5% requirement considered too high and would exceed demand. Currently 113 people on the register. Approx 6 of the reasonable alternative sites could potentially provide a range of smaller dedicated sites to meet this need. Self-builds are slower to deliver on larger sites, but specific sites could be phased without conflicting with mainstream construction.	Register figure is not representative, according to Housing officer at SNC (Keith Mitchell). Consider alternative policy approach?

<p>Paul Rudd Agent: Pegasus Group [22808]</p>	<p>Object</p>	<p>Approach not supported by evidence of need for such a scale of provision and is therefore not justified. (Register should avoid double counting across districts.) Policy should encourage provision, refer to ongoing need from updated register and ongoing monitoring of supply/provision. Policy doesn't allow for specifics of sites to be considered (suitable site, viability impacts). Wrong to assume self/custom build plots are wanted within a wider housing site. More appropriate to have as windfall sites under policy 7.5</p>	<p>Register figure is not representative, according to Housing officer at SNC (Keith Mitchell). Discuss with Housing officers consolidation of SB registers into GN. Consider linking policy to SB register/monitoring? Consider applying policy to smaller sites? Consider SB policy linked to windfall sites?</p>
<p>Lanpro Services and Glavenhill Ltd Both represented by Stephen Flynn (SF is Lanpro)</p>	<p>Object</p>	<p>Recommend approach of South Northamptonshire Local Plan; It allows for small scale self-build sites immediately adjoining the confines of defined villages to be approved, rather than requiring them to be provided on allocated land.</p>	<p>Investigate SNLP policy. Consider SB policy linked to windfall sites?</p>
<p>Hopkins Homes, Persimmon Homes & Taylor Wimpey and Kier Living Eastern Ltd (Hopkins homes also posted separately)</p>	<p>Object</p>	<p>5% is considered inappropriate and unjustified, supply will significantly exceed demand. Will impact delivery, thereby 5-year land supply. May make it difficult to achieve a well-integrated development from a design perspective. Should be secured on a site-by-site basis, dependent on local need at the time of the development, or alternatively an exception site approach.</p>	<p>Register figure is not representative, according to Housing officer at SNC (Keith Mitchell). Consider SB policy linked to exception sites?</p>

Both represented by Bidwells			
Home Builders Federation	Object	<p>Support encouragement of self builds through local plan but 5% requirements is not justified or consistent with national policy. Supply will significantly exceed demand.</p> <p>The policy is inconsistent with 3rd bullet paragraph 57-025 of PPG Policy moves beyond encouragement and requires landowners to bring forward plots.</p> <p>We don't consider sufficient options have been looked at regarding how plots can be provided to self-builders. Paragraphs 57-014 & 57-024 of the PPG sets out need to consider: use of LA land; housing strategy; and regeneration functions. Burden for delivery is on larger sites without evidence that an alternate approach has been investigated. Self and custom build registers alone don't provide sufficiently robust evidence to assess needs. The PPG has been amended to include paragraph 57-011 which requires additional data from secondary sources to better understand the demand for self-build plots. Demand may be for individual plots in more rural locations. Without appropriate evidence to show demand on such sites the proposed approach cannot be considered justified or effective and should be deleted.</p> <p>More effective approach is through policy 7.5 which we support, though we would amend to allow developments of up to 5 dwellings.</p>	<p>Register figure is not representative, according to Housing officer at SNC (Keith Mitchell).</p> <p>Consider if policy complies with PPG?</p> <p>Evidence consideration of alternative approaches.</p> <p>Consider increasing evidence base?</p> <p>Consider how policy can meet demand in rural locations?</p>

			Consider SB policy linked to windfall sites?
Nicole Wright	Object	<p>Policy does not show real response to demand in locations where needed. Not sound or justified.</p> <p>Draft Policy 7.4 provides no guidance or criteria in relation to self-build and custom housebuilding.</p> <p>Making policy more akin to Breckland strategy (Policy HOU 05) would be more consistent and appropriate.</p> <p>the Monitoring Framework, Indicator Code GNLP 39 and indicator demonstrates the shortcomings of this Draft Policy in identifying the sole indicator for monitoring custom housebuilding as:</p> <p>‘Percentages of sites of 40 dwellings or more (excluding flats) where 5% of plots are provided for custom build.’</p>	<p>Investigate Breckland approach to SB.</p> <p>Consider whether monitoring framework could be amended (for current or amended policy)</p>
Barratt David Wilson Homes Agent: Pegasus Planning Group	Object	<p>5% is not the right approach. PPG para 57-025 states council should ‘encourage’.</p> <p>On larger sites the cost of delivering infrastructure can reduce percentage of affordable housing. Self-build requirements may further reduce this level.</p> <p>Registers can be incorrect – need updates to remove those no longer needing and to assess double counting across registers. May be artificially inflated by people aspiring to live in the area. Based on the 113 on the register, it is likely the number of plots will exceed demand. Should prioritise sites on edge of settlements, i.e. through policy 7.5 to meet demand in rural settings. This will also mean the sites will come forward when needed rather than in bulk which will make them difficult to market and sell within 12 months.</p>	<p>Consider if policy complies with PPG? Viability of policy?</p> <p>Register figure is not representative, according to Housing officer at SNC (Keith Mitchell).</p> <p>Consider SB policy linked to windfall sites?</p>
Persimmon Homes (Anglia)	Object	<p>5% not necessary or appropriate mechanism for ensuring demand is met. Likely to mean more are built on large sites but demand is for individual plots in more rural locations.</p>	<p>Consider how policy can meet demand in rural locations?</p>

		<p>Only 113 people on register so likely to exceed demand and result in plots left empty which would impact neighboring dwellings and developments as a whole.</p> <p>As self builds are bespoke their relationship to the character and appearance of wider development may be an issue. More appropriate to deliver as part of smaller housing schemes of self-build exclusive housing schemes.</p> <p>Echo comments of HBF that more effective approach would be through Policy 7.5 but with adjustment to allow developments of up to 5 dwellings.</p>	<p>Register figure is not representative, according to Housing officer at SNC (Keith Mitchell).</p> <p>Consider alternative policy approach?</p> <p>Consider SB policy linked to windfall sites?</p>
Hingham PC Duplicated email and web reps	Comment	Planners should consider allowing more self- build and should allow some experimental green initiative building that addresses the climate emergency	None
Hopkins Homes Ltd	Comment	<p>Demand for such housing is upon smaller and individual development sites in predominantly rural locations.</p> <p>Specific smaller sites in rural locations should be allocated rather than requiring this provision from larger sites.</p>	Consider alternative policy approach?
<p>Pigeon investment Management Ltd Agent: Pegasus Group</p> <p>Posted three times (for Diss, Hethersett Reepham sites)</p>	Comment	<p>Insufficient evidence to justify 5% policy.</p> <p>Self build registers are not publicly available to validate policy approach.</p> <p>Many seeking to self-build wish to do so in rural areas.</p> <p>requirements should be specific to individual allocations.</p> <p>Policy could be expanded to allow self-build schemes where they are well related to settlement boundaries and have access to services/facilities.</p>	<p>Consider increasing evidence base?</p> <p>Consider alternative policy approach?</p> <p>Consider SB policy linked to windfall sites?</p>
Welbeck Strategic Land III LLP and	Comment	Generally support objectives. But policy will result in more self/custom builds than there is an identified need for. Broad calculation, applied to only the new allocations in the draft GNLP (7,840 homes), would result	Register figure is not representative, according to Housing officer at SNC (Keith Mitchell).

M Scott Properties Ltd and Abel Homes (twice) all via Bidwells		in the provision of approximately 392 SB units. Only 113 people on the self and custom build register in the Greater Norwich Area (2018/19) As well as the self build / custom build register, additional data from secondary sources should be considered to better understand the demand for self and custom build plots.	Consider increasing evidence base?
RJ BAKER & SONS	Comment	- General support for the idea of an element of self build plots - Typically these need to be reasonably generously sized plots - There is a relationship between housing mix and the potential for self build The threshold of 40 dwelling developments needs further justification)	Consider increasing evidence base?
Armstrong Rigg/Orbit Homes	Comment	Percentage requirement needs to be evidenced. Self-build registers should provide broadly accurate indication of demand (less some duplication). Policy will result in supply exceeding demand, but not in the right locations. Need flexibility to allow SB on sites adjoining settlements.	Consider increasing evidence base? Consider SB policy linked to windfall sites?
Gladman Developments	Comment	Object to fixed percentage requirement not the most effective approach to meet needs. Should be allocated where the need exists as windfall small sites rather than on large scale sites. Need should be evidenced. Self-build requirements should be tested through viability assessment. Support inclusion of mechanism allowing the allocation to be Considered after 12 months.	Consider increasing evidence base? Consider SB policy linked to windfall sites? Viability of policy?
Broadland Green Party	Comment	Support the general policy but also add support for self-build co-op schemes to build affordable homes which benefit by; pooling resources and capital involves more community participation homes fit wants, needs and aspirations select build method & contractors	Consider including self-build-co-operative element into policy?

		Cost savings (up to 40%) builds relationships with community.	
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QUESTION 33

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 33 - Are there any topics which have not been covered that you believe should have been?
TOTAL NUMBER OF REPRESENTATIONS:	10
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	3 Support, 0 Object, 7 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Public	Comment	Materials used should be sustainable New housing to be built to a low impact environmental standard including low carbon energy systems, efficient insulation and double/triple glazed windows and doors plus solar panels or other low impact lighting, heating & energy systems	Investigate new and proposed requirements that are being set via building regulations and standards that can be required by planning regulations in respect to low carbon, energy efficiency.
Hingham Parish Council	comment	provision of accommodation for homeless via charity	
Redenhall with Harleston Town Council	Support	Support Policy 5 and the stated requirements with regard to affordable homes, space standards and accessible housing	
East Suffolk Council	Support	Support the approach; pleased can meet the need, including buffer	

Watkins Jones Group	Support	WJG support these objectives for creating a vibrant and inclusive area that is enhanced by new homes, infrastructure and environment.	
Pigeon Investment Management Ltd (via Pegasus Group)	Comment	See questions 28 (space standards), 29 (Specialist housing) & 32 (self/custom build)	<p>Space standards: Investigate that the evidence for requiring NDSS accords with NPPF 2019 para 127f and footnote 46.</p> <p>Specialist housing: investigate if due to a lack of 1,826 bed spaces in care institutions for over 75s the number of dwellings needs to increase by 987 homes, based on PPG (63-016a).</p> <p>Self/custom build: Investigate if custom build need could be met on small scale windfall development (Policy 7.5) – perhaps if over three base years of information collected from the self-build and custom housebuilding registers need was not otherwise being met.</p>
Highways England	Comment	Consideration should be given to how cycles and other non-car modes of transport can be stored, and how electric cars can be charged when not in use.	
Broadland Green Party	Comment	no reference to quality of homes, energy efficiency and climate change.	

		<p>Norfolk has a general poor build quality – there appears to be lack of building control inspections to ensure minimal standards are met.</p> <p>climate change for Norfolk (2008) says - there is an opportunity to plan housing and infrastructure that will be much more resilient to the impacts of climate change, this will reduce long term risks for Norfolk residents and help avoid potentially major expense of addressing problems at a later stage</p> <p>new housing must be carbon neutral or at least built to Passivhaus standards.</p>	
Norwich Liberal Democrats	Comment	<p>no policy on housing design – all should be built to highest environmental standards.</p> <p>To meet sustainability, new developments should be built in locations which are truly sustainable in the settlement hierarchy.</p> <p>Agree with CPRE – new sites should be phased in once previous allocations have been built. Phasing can tackle land-banking.</p> <p>Windfalls should be included in the target count.</p>	

QUESTION 34

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 34 –Do you support, object or have any comments relating to the approach to employment land?
TOTAL NUMBER OF REPRESENTATIONS:	30
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	4 Support, 9 Object, 17 Comments

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Mr Graham Everett [14431]	Support	It is essential that employment growth that is within easy reach of the new dwellings is encouraged.	None
CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	Comment	Do not agree with the allocation of so much green-field land Essential that allocated sites are adhered to. No exceptions should be made, particularly for larger businesses, to develop outside allocated areas. The development of existing allocations should be prioritised before any new sites are added.	Control of development on unallocated sites
Hempnall Parish Council (Mr I J Nelson, Clerk) [13769]	Comment	As above	Control of development on unallocated sites
Hempnall Parish Council (Mr I J	Object	Employment land already allocated in the JCS should be developed before any new sites are added. A large amount remains available.	Control of development on unallocated sites

Nelson, Clerk [13769] (2 separate entries – 3 in total)		Allocated sites should be adhered to and no exceptions should be made, particularly for larger businesses, to develop sites outside these allocated areas.	
Salhouse Parish Council (Ms Sarah Martin, Clerk) [13648]		Do not agree with the allocation of so much green-field land Essential that allocated sites are adhered to. No exceptions should be made, particularly for larger businesses, to develop outside allocated areas. The development of existing allocations should be prioritised before any new sites are added.	Control of development on unallocated sites
Mr Andrew Cawdron [12806]	Comment	If you are going to declare an Local Development Order, at least uphold the conditions of that order. (See Food Enterprise Zone at Easton).	None
Saving Swainsthorpe Campaign (Robin Parkinson) [19447]	Comment	Green field sites for future employment land should be kept to a minimum. Development of non employment land for employment purposes should be strictly resisted. The JCS designated land is still available and in the case of South Norfolk, significantly underutilised.	Control of development on unallocated sites
Mrs S Bygate [19513]	Comment	To enable suitable non-allocated brownfield sites to come forward for redevelopment, reference should be made to redevelopment of employment sites to non-employment uses.	Redevelopment of brownfield sites
Lanpro Services [19515]	Object	Overall aims will not be achieved through the growth strategy and allocations for housing and employment are inadequate and not in the right place. Only 0.8 ha of new emp land is allocated in addition to the 20 ha of employment land at Hethel within the Cambridge Norwich Tech Corridor. No new allocations are made anywhere else within the corridor. Additional employment land linked to the first phase of a new settlement at Hethel would provide a tangible commitment to delivering on the stated vision and objectives.	Availability of sites and any constraints.

		<p>Land at Harford (GNLP0497), also within the Hi-Tech corridor should be allocated to ensure a healthy supply of viable sustainably located employment sites that will help the plan to meet its objectives for jobs growth.</p> <p>In summary, the emerging GNLP will be reliant upon an employment land supply that is not flexible or diverse enough; that is not ambitious enough; is made up of key sites which either have infrastructure constraints to delivery, or have other environmental constraints to expansion; and as such the emerging GNLP plan will conflict with the NPPF and is unsound.</p>	
Glavenhill Ltd [19516]	Object	<p>Overall aims will not be achieved through the growth strategy and allocations for housing and employment are inadequate and not in the right place.</p> <p>Only 0.8 ha of new emp land is allocated in addition to the 20 ha of employment land at Hethel within the Cambridge Norwich Tech Corridor. No new allocations are made anywhere else within the corridor.</p> <p>Additional employment land linked to the first phase of a new settlement at Hethel would provide a tangible commitment to delivering on the stated vision and objectives.</p> <p>In summary, the emerging GNLP will be reliant upon an employment land supply that is not flexible or diverse enough; that is not ambitious enough; is made up of key sites which either have infrastructure constraints to delivery, or have other environmental constraints to expansion; and as such the emerging GNLP plan will conflict with the NPPF and is unsound.</p>	Availability of sites and any constraints.
Mrs Georgina Brotherton [19554]	Object	Object to the approach to existing small and medium size employment sites.	Need for specific policy to manage proposals for employment site expansion?

		<p>Policy 6 is not flexible enough to meet the changing requirements of businesses. Paragraph 2 first bullet should be amended to allow for the expansion of small and medium sized sites, such as Abbey Farm Commercial Park, as follows:</p> <p>2.The needs of small, medium and start-up businesses are addressed through:</p> <ul style="list-style-type: none"> • the allocation and retention of smaller scale employment sites across the area and the potential expansion of, a range of existing small and medium sized sites (LPP suggested text); 	
Hingham Parish Council (Mrs A Doe, Clerk) [12974]	Comment	<p>Allocation of employment sites and housing development should consider how the 2 areas would impact on each other both positively and negatively. Siting a housing development close to an employment area can have many negative impacts on residents</p> <p>Employment does not occur in just one designated area within a community.</p> <p>No time scales regarding development of the employment area, when would the jobs be delivered?"</p>	Impact of juxtaposition of employment and residential
Brown & Co (Mr Paul Clarke, Associate Partner) [12840]	Support	<p>Clarion support the approach to employment land. Sustainable employment and economic growth requires high quality housing in close proximity to strategic sites; to attract workers and investment to the area and promote sustainable modes of transport. Clarion provide significant direct support to the economy and residents through education and skills development; community centres providing volunteering programmes and digital training; an innovative employment and business start-up scheme, and supporting the needs of small, medium and start-up businesses</p> <p>Honingham Thorpe is well related to the Food Enterprise Park and would support its development, the emerging agri-tech corridor to the west of</p>	Role of the Honingham Thorpe proposal in supporting the economy.

		Norwich, and the move to a post-carbon economy. It would provide support for skills, education and life-long learning. It would generate a holistic approach to the agri-tech sector in combination with the Food Enterprise Park, Norwich Research Park and Easton College, creating a world-leading agri-tech corridor for the post-carbon economy. A range of flexible spaces would be provided within the village centre for small and start-up businesses, whilst provision would be made to support working from home. Employment should not be seen in isolation but in conjunction with a holistic approach to delivering growth, to allow people to live and work in the same area.	
Ms Carol Sharp [14169]	Comment	The development of land allocated in the JCS should be prioritised before any new sites are added. Proposed 40 hectares at Norwich airport, promoting out-of-town commercial and industrial development that is poorly served by public transport. Any analysis of these options is likely to show that they will increase carbon emissions. SNGP while not agreeing with the allocation of so much green-field land for employment/economic use, insist it is essential that any such allocated sites are adhered to, particularly for larger businesses.	Control of development on unallocated sites.
Redenhall with Harleston Town Council (Ms Lynda Ling, Clerk) [13574]	Support	The Town Council supports Policy 6 (The Economy) and commends the intention to ensure sufficient employment land is allocated in accessible locations to meet identified need and provide for choice.	
Mulbarton Parish Council (Miss A Phillips, Clerk) [13463]	Object	A large amount of greenfield site is reallocated or being developed near Mulbarton and the Parish Council would not want to see this increased.	No increase in greenfield allocations near Mulbarton
Norwich Airport		Incorrect Site Area	Correct size of allocation.

	<p>NA supports the allocation in Policy 6 and that 50% is allocated for general employment. However, the proposed allocation should include all of submitted Site 4, which extends to 46.5ha.</p> <p>The agreed Masterplan safeguards 44% of the land (20.5ha out of the total 46.5ha) for aviation-related uses and should be reflected in the GNLP.</p> <p>Direct access onto Broadland Northway makes it suitable for roadside and leisure uses (Use Classes A1-A5 / sui generis / C1 / D2) in addition to Class B and D1 Uses. Retail uses will help to improve the sustainability of the Site by providing services and facilities for future employees.</p> <p>Policy should include a time limit, to reduce the amount reserved for aviation-related employment over time, reflecting market conditions and evidence. This flexibility is supported by the NPPF: Planning policies should be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstance.</p> <p>In conclusion the proposed allocation in Policy 6 should:</p> <ol style="list-style-type: none"> 1. Be extended to 46.5 ha in total make efficient use of previously developed land, in accordance with national planning policy; 2. Include roadside and leisure uses (Use Classes A1-A5, sui generis, C1 and D2) given its situation adjacent to the regional strategic highway network and to improve the sustainability of the remainder of the Site for future employees (both aviation and non-aviation); and 3. Allow for a greater proportion of non-aviation floorspace to come forward in the 	<p>Consider scale allowed for non-aviation related uses, and land for roadside uses.</p>
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		event that the aviation floorspace is not realised in the next 5-10 years."	
Pigeon Investment Management Ltd [11441]	Comment	<p>The allocations do not necessarily reflect the balance of the workforce with the existing jobs, and therefore rely upon an increase in commuting flows between settlements.</p> <p>E.g. Hethersett where the imbalance between the workforce and jobs within the settlement is likely to increase significantly with a greater number of residents required to commute to other settlements.</p> <p>In settlements which experience such imbalances, appropriately sized employment allocations should be identified e.g.. Land off Melton Road, Hethersett</p>	Balance of jobs and workers in settlements
Pigeon Investment Management Ltd [11441]	Comment	<p>The allocations do not necessarily reflect the balance of the workforce with the existing jobs, and therefore rely upon an increase in commuting flows between settlements.</p> <p>E.g. Diss is a significant net importer of people commuting into the settlement to work. In order to minimise the need to travel it would therefore be appropriate to deliver additional housing to provide the opportunity for those working in the town to live in the town.</p>	Balance of jobs and workers in settlements
Horsham Properties Ltd [16997]	Comment	<p>To be consistent with other policies of the GNLP, and with the previous JCS and the NPPF, Policy 6 should be modified to provide a flexible policy to accommodate needs not anticipated by the Local Plan and enable the expansion of existing small and medium size employment sites across of the GNLP area e.g.the Abbey Farm Commercial Park site.</p> <p>Policy 6, Paragraph 2 should be amended as follows: The needs of small, medium and start-up businesses are addressed through:</p>	Is there a need for specific policy to manage proposals for employment site expansion?

		<ul style="list-style-type: none"> the allocation and retention of smaller scale employment sites across the area and the potential expansion of, a range of existing small and medium sized sites (LPP suggested text); 	
Norwich Green Party (Ms Denise Carlo, LP Contact) [12781]	Support	<p>We support:</p> <ul style="list-style-type: none"> emphasis on needs of small, medium and start-up businesses. A diverse, local economy with short supply chains is much more resilient than one which relies on multi-national companies. Expansion of innovation and skills and training. This will help to increase local wages, improve aspirations of school students and prepare residents for changes to the economy including the digital revolution. 	
Norwich Green Party (Ms Denise Carlo, LP Contact) [12781]	Object	Object to development of large number of strategic employment areas in locations which are dependent on car/lorry access e.g. Norwich Airport area, Longwater, Rackheath, Hethel, Food Enterprise Park. Even at Thorpe St Andrew, where such sites have been provided with some level of public transport, they were initially developed with public transport as an after-thought and new rail halts proposed have not materialised.	Sustainable access to strategic employment areas.
Norwich Green Party (Ms Denise Carlo, LP Contact) [12781]	Comment	<p>Employment land which has been allocated but sitting idle for some time should be either de-allocated or re-allocated for other purposes.</p> <p>Policy 6 (1) , reference to 'in accessible locations' should be refined to read 'in accessible locations served by public transport and or rail, walking and cycling'.</p> <p>Potential for increasing resilience of local economy and creating a circular economy should be explored e.g. set up industries which shorten supply chains and use local waste materials. One idea would be to manufacture buildings high energy efficient materials for constructing thousands of local homes rather than importing them.</p>	<p>Reallocation or deallocation of sites</p> <p>Expanded references to accessibility</p> <p>Need to increase resilience e.g. through circular economy and sustainable local construction.</p>
Breckland District Council (Ms Rachel	Comment	The Greater Norwich Energy Infrastructure Study April 2019 identifies shortfalls in supply for new development proposed in the GNLP and will also impact on development outside GNLP. It refers to Salle Grid which supplies	Electricity supply constraints

Gibbs, Planner) [19646]		<p>North Norfolk and Breckland along with Diss Grid which supplies West Suffolk and Breckland which are at full capacity.</p> <p>Breckland District Council would welcome the opportunity to engage with GNLP to explore a joint approach to any constraints which may arise as a result of the cumulative growth in both planned areas.</p>	
Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	Comment	<p>Breckland District Council also is concentrating growth in this area at Attleborough, Snetterton Heath, Thetford, Dereham and Swaffham.</p> <p>For information, Breckland District Council has employment growth planned for Cambridge Norwich Corridor and at Dereham see full response attached."</p>	Growth in the Cambridge Norwich Tech Corridor
Highways England (Mr Eric Cooper, LP Contact) [12879]	Comment	Highways England supports the delivery of employment sites where there is good connectivity with existing and future housing proposals, particularly where their location can minimise the need to travel, particularly by private car.	Accessible employment sites
Crown Point Estate [19671]	Object	<p>Scale is not defined, and should relate to space requirements, not simply numbers of employees. Large space users may rely on lower-cost rural sites, as they are priced out of new-build business parks in more central or prominent locations.</p> <p>Development management policies will control conversion of rural buildings, but the GNLP should allocate appropriate sites to provide greater certainty and allow clusters to develop. E.g. Park Farm proposal.</p> <p>Octagon Barn is promoted for mixed use, including employment, building upon current uses. Independent businesses such as shops, galleries, workshops, garden centres and tea rooms rely on rural locations for viability and for character. Space is not always available within villages, so land at the</p>	<p>Need to define "scale".</p> <p>Need for allocations to support rural business locations.</p>

		<p>edge is an appropriate location for such activities to support the vitality and viability of the village, at a scale that is appropriate to the location.</p> <p>Strategic growth in the city centre will need to be supported by accessibility, reduced traffic congestion and improvements in air quality. We submit a Transport Technical Note promoting the Loddon P&R site.</p>	
Pigeon Investment Management Ltd [11441]	Comment	<p>The allocations do not necessarily reflect the needs of individual communities. For example, where an employer with a particular connection to a settlement has identified a need to relocate to more suitable premises, provision should be made for this relocation to occur at the settlement through the allocation of an appropriate site. This circumstance exists at Reepham where a significant local employer has a need for new premises to allow for the continued successful operation and expansion of their business.</p>	<p>Is there a need for specific policy to manage proposals for employment site expansion?</p>

QUESTION 35

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 35 - Do you support, object or have any comments relating to the approach to tourism, leisure, environmental and cultural industries?
TOTAL NUMBER OF REPRESENTATIONS:	8 (7 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	2 Support, 1 Object, 5 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
21598 & 23051 Hingham PC	Comment / object	when will broadband improvements be delivered to support local services? businesses within KSC's have limited access from public transport and will need additional parking. Parking within Hingham is insufficient to support growth	Broadband implementation Parking in Hingham
21760 Brown and Co	Support	Support approach Proposed Honingham Thorpe settlement will provide new country park, associated educational facilities and nature reserve and enhance local GI network	Site specific
21775 RSPB (East of England)	Comment	net tourist-oriented benefit will come from collaboration between GNLP and BA Broads Plan – needs to be included in wording whether this exists and if not when it will be formed	Collaboration with Broads Plan
21836 Natural England	Comment	Note contributions of multi-functional GI to make area attractive to employers and employees, as well as attracting inward investment Policy 5, bullet point 2, amend wording to include protection, enhancement and expansion of GI network	Strengthen policy wording on Green Infrastructure

22406 Horsham Properties Ltd via Lawson Planning Partnership Ltd	comment	Comment is the same across all Policy 6 questions; Policy not flexible in not allowing for expansion of existing small and medium size employment sites, such as Abbey Farm Commercial Park Should amend second bullet point to include this	(as for Q 34)
22421 Norwich Green Party	Support	support such industries which reflect local innovation and support a high-quality environment. Greater emphasis on tourists and short-stay visitors arriving by public transport rather than personal car	
22857 Crown Point Estate via Pegasus Group	Comment	Additional land at Whitlingham Country Park should be safeguarded for extended country park-related development to enhance the greenspace and provide a variety of leisure activities. This will provide confidence in investment in country park-related development	Site specific

QUESTION 36

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	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?
TOTAL NUMBER OF REPRESENTATIONS:	8 (6 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 1 Object, 6 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
21600, 21612 & 23052 Hingham PC	Comment	'new retailing' – concern there is no focus on encouraging, preserving and enhancing high street retail environment by addressing empty retail premises and assisting existing businesses to flourish	Prioritise vacant shops, take measures to support town centres
21761 Brown & Co	Support	Support sequential approach	
22407 Horsham Properties Ltd via Lawson Planning Partnership Ltd		Comment is the same across all Policy 6 questions; Policy not flexible in not allowing for expansion of existing small and medium size employment sites, such as Abbey Farm Commercial Park Should amend second bullet point to include this	(as for Q 34)
22422 Norwich Green Party	Comment	Sequential Approach: car parking standards to be lowered and made consistent across GN urban area so employers are less tempted to relocate to green field area with greater parking need to improve sustainable transport so locations can be accessed by bus, foot, cycle and possibly rialto avoid reliance on private car use.	Parking issues, sustainable access

		<p>Existing out of town strategic developments (Longwater, Broadland Business Park) are a climate disaster and occupy large amounts of land, less car parking would be more efficient. Develop city centre brownfield employment sites (e.g. Barrack Street) before approving out of town locations</p> <p>Other main town centre uses: reduce car parking and re-develop land for housing. NCC should not rely on revenue from car parks. Encourage short stay users (shoppers) to use park and ride</p>	
22858 Crown Point Estate via Pegasus Group	Comment	<p>Promoting Octagon Barn for mixed use including small-scale/retail</p> <p>Policy ends with desire to enhance environment and economy of villages, but town centres section doesn't distinguish between types of retail use.</p> <p>Hierarchy of defined centres is appropriate for chain stores and supermarkets, but independents cannot compete with these in high value locations.</p> <p>Policy should clarify type and/or size of retail use to follow a sequential test</p>	Operation of the sequential approach
23116 Salhouse PC	Object	<p>ok if policies encourage new business, but no need to develop new sites when there are existing vacant ones.</p> <p>Encourage use of town centres through lower business rates, free parking, better transport etc</p>	Prioritise vacant shops, range of measures to support town centres

QUESTION 37

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 37 – Are there any topics which have not been covered which you believe should have been?
TOTAL NUMBER OF REPRESENTATIONS:	6 (Hingham PC x2)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	1 Support, 0 Object, 4 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Hingham Parish Council (Mrs A Doe, Clerk) [12974 and 23053]	Comment	Use/regeneration of existing empty retail premises within high street/communities	Vacant properties and regeneration
East Suffolk Council (Ruth Bishop, Senior Planning Policy and Delivery Officer) [19611]	Support	We support the approach in The Economy policy.	
Horsham Properties Ltd [16997]	Comment	(As for Q34)	(As for Q34)
Mrs Nicole Wright [14312]	Comment	The draft policy does a good job at defining the allocated sites.	Need for policy to deal with “windfall” employment proposals

		<p>However, it needs to provide a clear framework for assessing future proposals that may come forward, in a flexible way that will respond to changing needs in both rural and urban contexts.</p> <p>Although it states what provision has been made, it does not offer criteria for assessing development proposals that are not currently in the frame.</p>	
Crown Point Estate [19671]	Comment	(As for 36)	(As for 36)

QUESTION 38

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 38 - Do you support or object or wish to comment on the approach for the city centre? Please identify particular issues.
TOTAL NUMBER OF REPRESENTATIONS:	19
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	6 Support, 5 Object, 8 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
The Theatres Trust	Support	The Trust is supportive of the proposed approach to supporting culture and cultural facilities. We would also recommend inclusion of a policy which protects cultural venues from unnecessary loss in line with paragraph 92 of the NPPF.	Recommend inclusion of a policy which protects cultural venues from unnecessary loss in line with paragraph 92 of the NPPF
Brown & Co	Support	Support the approach to the economy, and retail and leisure provision within the city centre. Query the ability to deliver the volume of housing proposed for the area in light of previous delivery rates and the proportion of carried forward allocations.	Query the ability to deliver the volume of housing proposed for the area in light of previous delivery rates and the proportion of carried forward allocations.

Norwich Green Party	Support	<p>In order to support and protect the city centre, we consider that it is necessary to limit the temptation of businesses to move to peripheral locations by constraining the amount of parking allowed for new developments across the Greater Norwich area and introducing workplace parking charges in and around Norwich. Parking charges would provide an income for investing in a public transport system.</p> <p>As the opportunities arise, we would like to see redevelopment at Riverside with higher densities and far fewer parking spaces. Riverside is a badly planned site where land has been squandered on surface car parking and a major access road</p>	<p>Limit development of businesses in peripheral locations to support and protect city centre.</p> <p>Redevelopment of Riverside with higher densities & reduced parking.</p>
Historic England	Support	<p>Para 271: This section recognises the unrivalled historic environment of the historic city centre which is welcomed.</p> <p>Para 273: We welcome the reference to the need to make the best use of its distinctive assets.</p> <p>Historic England broadly supports redevelopment of brownfield sites both in the City Centre, (including the northern city centre), east Norwich and the wider urban area. However, all such development should conserve and enhance the historic environment and be of an appropriate scale and massing, reflecting the grain and historic street patterns of the City.</p>	<p>Development should conserve and enhance the historic environment and be of an appropriate scale and massing, reflecting the grain and historic street patterns of the City.</p>
Savills for Whitbread PLC	Support	<p>Support for point 3: “Development of new leisure and cultural facilities, hotels and other visitor accommodation to strengthen the city centre's role as a visitor and cultural destination will be accepted in accessible locations well related to centres of activity and transport hubs”</p> <p>Support for point 5 regarding landmark gateway developments.</p>	<p>No issues requiring investigation.</p>
Norwich Green Party	Object	<p>We object to a Northern City Centre Strategic Regeneration Area based around a large district centre/mixed use development at Anglia Square.</p>	<p>Object to the approach taken to Northern City Centre Strategic Regeneration Area –</p>

		<p>We recognise that the Anglia Square site provides the most sustainable and accessible in the city centre. However, in our view and many others, the scheme called in by the Secretary of State is not consistent with sustainable development. If the scheme is rejected by the Secretary of State, we advocate a low rise high density mixed use development comprising mixed housing, (with a higher percentage of affordable housing), local retail, employment, cultural and community facilities built to high sustainability standards.</p> <p>Support for a lower number of dwellings than the 1,250 envisaged for Anglia Square, would require new sites to be identified elsewhere. Windfall sites are highly likely.</p>	<p>advocate alternative approach consisting of a low rise high density mixed use development comprising mixed housing, (with a higher percentage of affordable housing), local retail, employment, cultural and community facilities built to high sustainability standards. (Acknowledging this would require additional sites to be identified)</p>
Historic England	Object	<p>Para 274: Bullet point 2 should be amended to read conserving and enhancing the historic and natural environment to more closely reflect the NPPF</p>	<p>see summary</p>
Historic England	Object	<p>Policy 7.1 Concern over Housing Figures including Anglia Square & Carrow Works. It is felt Anglia Sq. capacity is closer to 600 than 1200. Suggest caution relating to capacity of Carrow works site, detailed HIA required to assess & protect heritage assets.</p> <p>Concerns raised regarding high densities, particularly delivered through tall buildings & their impact on the historic character of the area. we consider that it is essential evidence base document is prepared outlining the site capacities and the assumptions that have been made in reaching these figures, particularly for the sites in the City. The evidence should set out the indicative site capacity, site area, density (as dwellings per hectare dph), assumed maximum height, surrounding heights of development, other on site and off site capacity considerations (e.g. heritage, natural environment etc.). This will provide a helpful starting point for us to be able to</p>	<p>Concern over Housing Figures including Anglia Square & Carrow Works.</p> <p>Concerns raised regarding high densities, particularly delivered through tall buildings & their impact on the historic character of the area.</p>

		consider whether the indicative site capacities are justified, realistic and achievable in terms of their impact upon the historic environment (and other factors).	
Historic England (22544)	Object	The title “Natural and Built Environment” should be changed to: “ <i>The built, natural and historic environment</i> ” Suggestions for revisions to wording of policy & addition of some key principles. Concern regarding landmark buildings at gateways to the city centre – particularly relating to height.	see summary
DAVID LOCK ASSOCIATES/ORBIT HOMES REPS CURRENTLY MISSING ONLINE	Object	Consider policy 7.1 has serious flaws: <ul style="list-style-type: none"> • The assumptions over the scale of housing delivery arising from a key regeneration site in the centre of Norwich (Carrow Works) which is subject to considerable and acknowledged uncertainty & historic under delivery of east Norwich sites. • the failure to distribute new growth within other parts of the GNLP area to more closely align with local housing needs where they arise and thus avoid market saturation in areas of more marginal viability; • misalignment between the spatial strategy and the economic priorities of the Plan related to the Tech Corridor; and • the assumptions over the scale of housing delivery arising from a key regeneration site in the centre of Norwich (Carrow Road) which is subject to considerable and acknowledged uncertainty above).. 	Over reliance on east Norwich Failure to distribute development appropriately through hierarchy misalignment between spatial strategy & economic
Member of public	Comment	It might be appropriate to suggest a longer-term plan to exclude traffic from the city centre altogether. This concept is being developed in Oslo with considerable success.	Suggested strengthening car free plan for city centre (long term)
Barton Willmore	Comment	rep relates to urban fringe	No issues requiring investigation
Pegasus Group for Pigeon Investment Management Ltd.	Comment	Housing numbers should not rely upon Anglia Sq. which is subject to call-in.	Concern relating to over reliance on Anglia Square & East Norwich

(Submitted for Hethersett, Dereham Road - Reepham, and Walcott Green Lane – Diss)		<p>Concern relating to East Norwich Regeneration – permission on Deal Ground has not progressed over 7 years, potential flood risks, lack of evidence of deliverability of this quarter.</p> <p>Suggest an alternative approach seeking greater proportion of allocations of smaller more deliverable sites at Main Towns and Key Service Centres.</p>	sites – suggest greater distribution through hierarchy.
Crown Point Estate	Comment	<p>The growth of the city centre is supported as a sustainable location for growth. However, this should be matched by accessibility. We are promoting the Loddon P&R site to ensure that all road routes into the city are provided with Park and Ride sites to facilitate sustainable “final mile” journeys into the city, with associated benefits to congestion and air quality in the city centre. Without the support of infrastructure, growth in the city risks not being sustainable.</p>	Promoting Park and Ride site to support transport infrastructure & facilitate sustainable transport approach.
Network Rail	Comment	<p>Relating to existing allocation CC13, evidence to support consideration for re-allocation</p>	Policy CC13 will require renewed assessment now that deliverability evidence has been provided.

QUESTION 39

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 39 - Do you support or object or wish to comment on the approach for East Norwich? Please identify particular issues.
TOTAL NUMBER OF REPRESENTATIONS:	17
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	4 Support, 3 Object, 10 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Lanpro Services Also submitted for Glavenhill Ltd.	Support	The approach to East Norwich is supported. This is a key area of the City Centre that will benefit from regeneration and can support an attractive new community area for the city. The inclusion of sustainable energy generation is only supported if the type and scale of generation is compatible with achieving a healthy and attractive environment for the proposed new residential community and does not compromise air quality or amenity standards for residents.	No issues requiring investigation
Norwich Green Party	Support	We broadly support the proposals in principle. There is a need to reference the requirement to protect the Carrow Abbey County Wildlife Site in the policy wording. Interim Sustainability Appraisal has been wrongly applied & undermines its whole purpose by also considering 'delivery' as a factor to weigh against the objectives. The way it has been applied will result in unaffordable housing in unsustainable non-communities with no employment.	Need to reference Carrow Abbey County Wildlife site within the policy Inappropriate application of Sustainable assessment.

Crown Point Estate	Support	<p>We support the allocation of East Norwich and note the intention for sustainable accessibility and traffic restraint, and for links between the city centre and Whitlingham Country Park.</p> <p>The addition of 2,000 additional homes in this location, as well as other uses, will result in significant additional population living and working on the site. This makes it even more important that Park & Ride facilities are located in close proximity, to ensure sustainable access.</p> <p>The pressure from additional population within a high density development, where land is at a premium, may need to be met by SANGS. The additional land at WCP should be safeguarded for this purpose within the Plan.</p>	<p>Suggest close proximity of park and ride will support this site & reduce traffic impacts</p> <p>Highlight for consideration of provision of SANGS – suggest Whitlingham Country Park</p>
Member of public	Object	<p>Increased population will exhaust existing facilities.</p> <p>Roads do not have capacity for increased traffic – increased risk to pedestrians</p> <p>Concerns relating to light pollution.</p>	<p>Increased population will exhaust existing facilities.</p> <p>Transport infrastructure lack capacity</p> <p>Light pollution</p>
Historic England	Object	<p>Concerns relating to impact to Carrow Abbey/Priory & heritage assets</p> <p>Doubts relating to developable area & therefore capacity of site. Recommend HIA is carried out.</p> <p>Additional detail provided in an appendix</p>	<p>Impact on heritage assets including Carrow Abbey</p> <p>Doubts relating to developable area/site capacity (heritage impact)</p> <p>Recommend site specific HIA</p>

David Lock Associates for Orbit Homes.	Comment	<p>We consider there to be serious flaws arising from:</p> <ul style="list-style-type: none"> • the continued overreliance on East Norwich given past under-delivery; • the failure to distribute new growth within other parts of the GNLP area to more closely align with local housing needs where they arise and thus avoid market saturation in areas of more marginal viability; • the assumptions over the scale of housing delivery arising from a key regeneration site in the centre of Norwich (Carrow Road) which is subject to considerable and acknowledged uncertainty). 	Over reliance on site (& East Norwich regeneration) which has a high level of uncertainty at detriment to distribution of growth throughout hierarchy.
Member of public	Comment	Any energy generation on Utilities site should be of a manageable scale, using proven technology & be truly green.	Clarity relating to energy generation.
Brown & Co.	Comment	<p>Concerns relating to deliverability of East Norwich Regeneration. Flood Risk, Contamination, infrastructure constraints, proximity to Broads & heritage assets.</p> <p>It is considered that a high level of information regarding deliverability in this area should be required before previous allocations are carried forward and new allocations are made, so as to ensure housing need is met and a five-year housing land supply can be secured. Whilst the regeneration of the area is desirable, it is considered that by virtue of the area characteristics outlined, the proposed scheme would be more suitable as a long-term initiative considered when the Greater Norwich Local Plan is reviewed.</p>	<p>Concerns relating to deliverability of East Norwich Regeneration. Flood Risk, Contamination, infrastructure constraints, proximity to Broads & heritage assets.</p> <p>Long term allocation more suitable for plan review.</p>
RSPB (East of England Regional Office)	Comment	<p>Concerns relating to Flood Risk</p> <p>Regarding biodiversity buffers, are there opportunities with the 4 proposed developments in East Norwich to bring nature close to or within these development areas?</p>	<p>Flood risk</p> <p>Suggest including increased nature close to or within development</p>
Norfolk Wildlife Trust	Comment	Reference to Carrow Abbey County Wildlife Site. The outline permission granted several years ago highlights the clear need to safeguard this site in perpetuity as part of the wider site design and we recommend that specific reference to these requirements is made in the policy text for clarity.	Due regard required to Carrow Abbey County Wildlife Site

Barton Willmore	Comment	Rep relates to Urban fringe & Wymondham rather than East Norwich	No issues requiring investigation
Pegasus Group for Pigeon Investment Management Ltd (x3)	Comment	East Norwich regeneration is a complex set of sites which may struggle to deliver within the plan period due to multiple constraints. <i>“the emerging GNL P should not place an over reliance on the new East Norwich allocation (1,200 homes) and should look to other sources of supply to meet its housing requirements.”</i>	Concerns relating to deliverability of east Norwich regeneration sites due to considerable constraints.

QUESTION 40

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	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.
TOTAL NUMBER OF REPRESENTATIONS:	40
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	8 Support, 9 Object, 23 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
East Suffolk Council (Ruth Bishop, Senior Planning Policy and Delivery Officer) [19611]	Support	The Council supports the approach in this policy. It may be of interest to the GNLP know that Barnby Bend bypass Major Route Network improvement proposal has progressed to the next stage. Improvements to the section of the A146 near Barnby, commonly known as the Barnby Bends, would benefit the whole A146 route between Lowestoft and Norwich, and the A143 link to Diss and Bury St Edmunds. Reference is also made to Housing Design Audit for England by Place Alliance outlining the benefits of designing at higher housing densities.	
Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]	Comment	Rackheath - On behalf of Norfolk Homes Ltd., Site off Green Lane West, Rackheath (ref. 20171464). Awaiting BDC to grant planning permission for 322 no. dwellings and associated development on the land.	<ul style="list-style-type: none"> • Update commitment etc. • Consider specific policy

Mr Graham Everett [14431]	Support	Taverham -support the proposed site for 1400 dwellings subject to adequate infrastructure being provided in the early stages of the development.	<ul style="list-style-type: none"> • Consider representation and supporting documents
Yare Valley Society (Mr John Elbro, Chair) [14909]	Support	Strongly supports the commitment in Policy 7.1 to enhancements to the green infrastructure which will include links to and within the Wensum, Yare, Tud and Tas Valleys, Marriott's Way and beyond. The strengthening our GI network is key to meeting the challenges of declining biodiversity, combating climate change, and promoting the mental well-being of our communities.	
Hopkins Homes, Persimmon Homes and Taylor Wimpey [16216] Bidwells (Mrs Sarah Hornbrook, Associate) [14444]	Support	Sprowston – Strong support for the proposed allocation for 1,200 dwellings (min) at Whitehouse farm, Sprowston.	
Kier Living Eastern Ltd [16268] Bidwells (Mrs Sarah Hornbrook, Associate) [14444]	Support	North East Norwich - Support for Growth Triangle Area of growth and retention of GT AAP. Sites such as GT13: Norwich Rugby Club, have already been shown, through their allocation in the Area Action Plan to be sustainable and suitable locations for housing growth, and this remains the case.	
Drayton Parish Council (Mr Jonathon Hall, Clerk) [13333]	Support	Drayton Parish Council agree with the GNLP findings that there are no further sites considered suitable or a reasonable alternative for development in the parish of Drayton for the reasons given.	
M Scott Properties Ltd [10884] Bidwells (Mr Iain Hill, Partner) [16273]	Support	Taverham - Strong support for identifying Norwich fringe as the location to accommodate 69% of the housing growth to 2038, this is consistent with NPPF para 72. The identification of 1,400 min in	<ul style="list-style-type: none"> • Check for additional info provided.

		Taverham is fully supported. Additional supporting documents are included with representation such as Masterplan etc.	
Barratt David Wilson Homes [15660] Pegasus Planning Group (Mr Ed Durrant, Principal Planner) [19673]	Support	Cringleford – Support for delivery in the Fringe parishes and higher densities to maximise the use of new infrastructure or that is in the process of being delivered. Additional supporting document submitted, and comments made in Sites Document.	
Members of the public - various	Object	<ul style="list-style-type: none"> • Sprowston- There is no consideration for local infrastructure improvements either maintaining, improving the quality of life of residents. • Hellesdon- There is a need for open spaces as golf course is being developed for residential uses. There is also a need for light industries not heavily polluting ones like the airport. • Honingham – is a rural village and countryside which should be retained. Opposed to further development due to increased car journeys, lack of infrastructure, and flood prone area. 	
Honingham Parish Council (Ms Jordana Wheeler, Clerk) [14400]	Object	Honingham – Object of being grouped with Easton and classified as part of Urban Fringe – when it’s a small rural parish leading to unsustainable development.	
Barton Willmore (Hannah Leary) [18595]	Object	<ul style="list-style-type: none"> • Objecting of no further allocations including those proposed: Thorpe St Andrews – GNLP2170 and 2171 • Comments submitted to Sites Document 	<ul style="list-style-type: none"> • Check Allocations Comments and attachments
Member of the public	Object	Sprowston is at risk of surface water flooding this is not adequately addressed by the current SFRA and evidence base concerned that future and existing residences aren’t adequately protected.	
Norwich Green Party (Ms Denise Carlo, LP Contact) [12781]	Object	Taverham - Object to Urban extension for 1,400 dwellings. A new strategic community at this location would lead to reliant on car and therefore increase carbon emissions, air pollution, traffic pressure in the Wensum Valley, and run off to the River Wensum SAC. The SA/SEE	

		for Taverham and Ringland confirms the negative impacts on air quality, noise and climate change etc.	
Historic England (Mrs Debbie Mack, Historic Environment Planning Adviser) [19652]	Object	<ul style="list-style-type: none"> • Soundness - Concerned that the current plan does not provide a sound framework for Norwich and would not protect the city's character, conservation area and significance for designated heritage assets. Remain concerned over Anglia Square redevelopment which under the present scheme would severely harm the character of Norwich City Centre. • Development Management Policies should be reviewed prior to EIP. 	
Orbit Homes [10994] David Lock Associates (Matthew Hewitt, Assistant Planner) [19674]	Object	North East Norwich – Object to overreliance given past under delivery. In addition, there's a failure to distribute new growth in other parts, to avoid market saturation, misalignment with strategy and other economic priorities in Tech corridor as well as assumption arising from key regeneration such as Carrow Road which is subject to considerable uncertainty.	
Carter Jonas LLP (Mr Richard Seamark, Partner) [14157]	Object	<ul style="list-style-type: none"> • Costessey- Object to the strategy for Costessey in respect to no allocation at this location • GNLP0284R – incorrectly marked as unreasonable alternative see comments on Site Allocations Doc. 	
Member of the public	Comment	Taverham/ Drayton – Doctor's surgeries and Schools are already overstretched	
Member of the public	Comment	Yare Valley - Consider the environmental and social impact of any further UEA expansion in the sensitive Yare Valley Area.	
Mr Graham Everett [14431]	Comment	Drayton – pleased to see no additional sites due to existing commitment. It is also within critical drainage area.	
Member of the public	Comment	Taverham – School, Doctors Surgery, and other services should be built before residential development.	

Member of the public	Comment	Drayton / Thorpe Marriott Please consider putting bridle ways into new plans. As none was put in when building Thorpe Marriott	
Member of the public	Comment	Sproston – This area where significant development is taking place and it is also at risk of surface water flooding. Therefore, a basic SRFA should be undertaken to protect existing and future homes.	
Member of the public	Comment	Taverham – GNL03337 The site is shown in two separate parcels and hopes it stays that way these have permissive paths for dog walkers.	
Lanpro Services [19515] Stephen Flynn [19514] Glavenhill Ltd [19516] Stephen Flynn [19514]	Comment	North East Norwich - In the absence of any evidence regarding delivery to support existing commitments, concerned about the reliance in the draft plan on the delivery of 13,430 homes in the Growth Triangle to 2038. Delivery of homes on key parts of the Growth Triangle has been very slow to progress since planning permission was granted.	
Brown & Co (Mr Paul Clarke, Associate Partner) [12840]	Comment	<ul style="list-style-type: none"> • Costessey - Wishes to submit an additional site to deliver 30 dwellings which is well related to main built form. • Concerned over the ability to and sustainability of, continuing to ‘bolt-on’ significant housing development to existing settlements. Such continuing urban sprawl is not considered to represent truly sustainable development, can often result in the creation of non-walkable neighborhoods separated from services and facilities, places increased pressure on local infrastructure, and often comprise identikit housing which fails to adequately respect local character and create community cohesion. 	
Environment Agency (Eastern Region) (Mr Liam Robson, Planning Advisor (lead officer)) [18780]	Comment	Section 5 of this policy specifically refers to ‘the Natural and Built Environment’. This policy should be strengthened and refer to the environmental policies within the River Wensum Strategy (upstream from Hellesdon) as it is relevant to development in the fringe parishes in that area e. g. Taverham, Drayton and Costessey	

Barton Willmore (Joshua Mellor, Senior Planner) [16965]	Comment	<ul style="list-style-type: none"> • Norwich North East – There is no clear evidence that the GT AAP allocations can be carried forward, there is also no justification as to why the GNLP will not supersede this plan. In addition, there’s are a number of sites which are unlikely to be delivered therefore, the shortfall must be accounted elsewhere. • Wymondham GNLPO525 – successfully secured consents reflecting not only the suitability as an appropriate location but also a track record of promoters bringing in suitable sites. 	
Pigeon Investment Management Ltd [11441] Pegasus Group (Mr Neil Tiley, Director) [19628]	Comment	<p>The Strategy should not place over reliance on sites such as Anglia Square, Carrow Road, North East Norwich GT AAP where there are risks of that these can be delivered.</p> <p>Representations and delivery statements submitted on behalf of the landowners in support of the proposed development of the sites at:</p> <ul style="list-style-type: none"> • Hethersett • Diss (Land at Walcot Green Lane • Reepham – Land at Dereham Road 	
Gladman Developments (Mr Craig Barnes, Planning Manager) [19643]	Comment	<p>Welcomes the proposals made under this policy to continue to focus fringe parishes for area of major growth.</p> <p>Costessey – allocation for 1,000 dwellings should be brought forward as an allocation instead of contingency site.</p>	
Breckland District Council (Ms Rachel Gibbs, Planner) [19646]	Comment	<p>For information, Breckland District Council also is concentrating growth in this area at Attleborough, Snetterton Heath, Thetford, Dereham and Swaffham. This includes employment growth planned for Cambridge Norwich Corridor and at Dereham.</p>	
Highways England (Mr Eric Cooper, LP Contact) [12879]	Comment	<ul style="list-style-type: none"> • Colney Strategic Employment Zone is likely to have a significant impact on the B1108/A47 Watton Road junction, and it is suggested early assessment on the junction and the A47 at this location is required to ensure that these sites are deliverable. • Costessey - A47 Longwater Junction suffers significant congestion at peak times and the proposed sites in and around Costessey will 	

		<p>likely to have a substantial impact on its performance. It is suggested early assessment on the junction and the A47 at this location is required to ensure that these sites are deliverable, together with its connections to the proposed Western bypass.</p> <ul style="list-style-type: none">• Easton and Honingham - agrees that there could be significant constraint to the proposed development with the existing highway infrastructure and further assessment is required. Road Bus Rapid Transit is welcomed to create sustainable transport opportunities.	
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QUESTION 41

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 41. Do you support or object or wish to comment on the approach for the main towns overall? Please identify particular issues.
TOTAL NUMBER OF REPRESENTATIONS:	24 (18 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	4 support, 4 object, 16 comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
20104 RJ Baker & Sons via Cheffins	Comment	<ul style="list-style-type: none"> • Broadly support overall approach • Agree Wymondham should have greatest proportion of growth • Feel it is capable of further growth given location within Cambridge-Norwich Tech Corridor, it's transport links, existing service base and growing employment sector • Support employment allocation within Wymondham, though there may be case long term for additional employment land 	To confirm the overall housing requirement for Wymondham, and to further understand policy requirements of preferred allocations sites.
20118 Landowner via Smallfish	Comment	<ul style="list-style-type: none"> • Consider allocating sites smaller than 0.5ha and fewer than 12 dwellings as does not reflect Para 68 of NPPF. • request removal of existing recreation/amenity land protection status on site GNLP3026 – previously part of school playing fields but sold to private owner 2018 by NCC 	Investigate overall housing numbers and the proportion to be provided on sites of less than 1 hectare.

20853 Welbeck Strategic Land III LLP via Bidwells	Comment	<ul style="list-style-type: none"> • Support identification of Main Towns to accommodate significant growth • Evident sites within Norwich Urban Area cannot deliver quantum of development envisaged. • Main Towns can accommodate more than 14% growth identified • Main Towns provide a range of services and amenities making them sustainable and in suitable locations for majority of growth. • Wymondham is a strategic employment location contributing to Norwich-Cambridge Tech Corridor 	Investigate further selection of a preferred contingency site for Wymondham.
21335 Lanpro Services via Stephen Flynn + 21414 Glavenhill Ltd	Object	<ul style="list-style-type: none"> • Only 100 new homes allocated in Tech Corridor despite emphasis in plan's vision and delivery statement • 400 proposed in Diss which isn't within Strategic Growth Area, the Cambridge Norwich Tech Corridor nor is it close enough to Norwich • Diss allocations should be halved to 200 and Harleston reduced to 150 with the 500 displaced homes relocated within the Tech Corridor/Strategic Growth Area 	Consider the approach to the overall housing requirement and its distribution across the settlement hierarchy.
21771 Brown & Co	Comment	<ul style="list-style-type: none"> • Concern for deliverability and sustainability of additional 'bolt-on' developments in these locations • These can create non-sustainable development and often result in non-walkable neighbourhoods separate from services and facilities 	Investigate the constraints to further development in the market towns, including issues such as transport, drainage, community facilities, historic environment, landscape impact, informal open space, and biodiversity net gain.
22044 East Suffolk Council	Support	Support approach in policy	
22135, 22703 & 22793	Support	<ul style="list-style-type: none"> • Support approach, though given dispersal of these settlements we consider a more ambitious level of growth should be deliverable. 	Consider the approach to the overall housing

M Scott Properties Ltd via Strutt & Parker LLP		<ul style="list-style-type: none"> • This would provide a greater degree of flexibility if a Norwich fringe site delivers slower than anticipated. • 14% proportion within Main Towns could be increased with reasonable alternative sites, such as GNLP0341 and GNLP0250 /0342 /0119/ 0291 which would provide retirement units in a central location • Our approach is supported by 	requirement and its distribution across the settlement hierarchy, taking account of Para 72 of NPPF.
22158 Pigeon investment Management Ltd via Pegasus Group	Comment	Necessary to make appropriate provision at these highly sustainable settlements to ensure rural economy is supported and local housing needs are addressed, including at Wymondham	
22190 Environment Agency (Eastern Region)	Comment	<ul style="list-style-type: none"> • Needs to be clear policy regarding 'Foul Infrastructure' which includes clause to ensure foul drainage infrastructure and treatments is provided in a timely manner ahead of occupation of new properties. • Planning permission should be granted once delivery of infrastructure within appropriate timescales has been secured. • Good that Anglian Water are being consulted, but there are several WRC's where a statement has been added (regarding plans to increase capacity) despite there being no scheduled upgrades to WRC treatment capacity in AMP7 • Beyond AMP7 Anglian Water Services will find it difficult to commit to upgrades due to uncertainty surrounding funding for upgrades assessed through their Asset Management Plan process. • Suggest a caveat surrounding funding availability is added to the sentence • Several WRC's are close to their permit requiring new applications, these could be constrained due to tight permit standards or not being achievable with conventional treatment. • Essential contingency options are assessed and outputs and recommendations from the WCS are used to direct growth within the districts. • This reaffirms need for a separate foul infrastructure policy needs including with the plan. 	To apply Environment Agency advice, and to include where relevant policy requirements.

		<ul style="list-style-type: none"> • Include requirement to demonstrate there is/will be sufficient wastewater infrastructure capacity to accommodate each development (likely in form of a pre-development enquiry response from Anglian Water in support of each planning application) 	
22226 Westmere Homes via Armstrong Rigg Planning	Comment	<ul style="list-style-type: none"> • concerned about relatively low growth within main towns, somewhat arbitrarily, and failure to take advantage of these deliverable sites, high levels of service provision and strong infrastructure connections. • In terms of cumulative growth the level of delivery at Aylsham would be lowest of 5 settlements, despite being 4th largest settlement in plan area • GNLP0336 represents the most suitable site 	To confirm the overall housing requirement for Aylsham.
22292 Landstock Estates Limited and Landowners Group Limited via Barton Willmore	Comment	<ul style="list-style-type: none"> • Wymondham is twice size of other settlements, and given its services, should be identified as a 'large main town'. • Audit of facilities and services should be undertaken, this will show Wymondham to be the largest town and most suitable to accommodate growth. • Do not object to identification of Long Stratton but believe allocations are unlikely to be delivered by 2038 • Agree with description of Main Towns and the role they have in GNLP but consider Wymondham has additional functions, and more important location, that elevate its status. • Allocations in Wymondham should be increased • Question why Harleston has its allocations given its lack of accessibility. • Strategy not considered justified or effective in line with requirement of the framework, and is considered unsound 	Consideration of overall housing numbers for Wymondham; and, to investigate options for expanding education provision.
22383 Pigeon investment Management Ltd via Pegasus Group	Comment	<ul style="list-style-type: none"> • Given statements regarding Diss in introduction to Policy 7.2, concerning that it ranks 3rd out of 5 main towns for housing delivery, representing 12% of new housing development at main towns • More growth should be allocated to Diss, especially considering it is the only main town which is a net importer of workers • To balance homes to jobs Diss should have more housing to address current worker shortfall to provide workers at the new employment development at Diss. 	To confirm the overall housing requirement for Diss.

		<ul style="list-style-type: none"> • GNLP 1044 should be allocated to address emerging unmet housing needs in area 	
22437 Gladman Developments	Comment	<ul style="list-style-type: none"> • Supports allocation of additional land in Main Towns. • Main Towns are sustainable and suitable • However, do not consider sufficient opportunities for new development is identified. particularly in Diss and Wymondham • Further sites should be allocated as should the Wymondham contingency site • Strategic gaps should be reviewed and revised as context for each gap is likely to have been altered due to recent developments • An evidence-based assessment of all affected land parcels together with wider related land is needed to consider whether strategic gaps remain relevant & necessary 	Investigate impact on the Strategic Gap to Hethersett; and, highways considerations (both in terms of site access and the wider highway network).
22455 Gladman Developments	Comment	<ul style="list-style-type: none"> • Considered there needs to be more growth in Diss • Questions proposed allocations in Diss 	
22465 Gladman Developments	Comment	<ul style="list-style-type: none"> • More allocations needed at Wymondham to meet housing & employment needs and provide flexibility within land supply to ensure deliverability of developments • 96% total growth in Wymondham is from committed development which means the evidence isn't up-to-date (e.g. elderly accommodation is not being met) and the tech corridor link is being ignored. • Wymondham is sustainable, spacious and well located to provide additional flexibility to respond to plan targets • By allocating additional land now the flexibility of housing land supply will increase and heighten durability against unpredicted changes and would help address local needs. • Strategic gaps should be reviewed and revised as currently constrains developments • Within the gap between Wymondham and Hethersett there has been development to the north eastern edge of Wymondham which has urbanised the area. • Gladman have commissioned FPCR to assess the Strategic Gap and consider how land included within functions. (APPENDIX 2) The evidence concludes; 	Considerations include: overall housing numbers for Wymondham; the appropriateness of the indicative masterplan; and, general planning matters of landscape impact, ecological protection, drainage, and highways access.

		<ul style="list-style-type: none"> • The gateway into Wymondham from the East is formed by Elm Farm Business Park. This is the most eastern extent of Wymondham; • The B1172 (Norwich Common) represents the only visual receptor for the gap, given general absence of public footpaths and obscured views on the A11; • Inter-visibility along the B1172 is however limited given intervening vegetation and built development; • The settlement pattern in Wymondham has recently altered from a nucleated settlement following recent development in the north east of the town; and • There is a limited degree of openness within the strategic gap between Wymondham and Hethersett owing to existing intervening vegetation and built development. • It is unlikely further development will compromise inter-visibility, physical separation or perceived openness and any issues can be mitigated against. 	
22546 Historic England	Object	We recommend including something on the individual characters of the main settlements in this section.	
22810 Landowner via Pegasus Group	Object	<ul style="list-style-type: none"> • Figures identified for main town expressed as ‘around’ and individual towns have fixed figures, despite overall housing requirement of plan being a minimum figure. Therefore recommend ‘minimum’ carried through into policy wording for main towns, including individual targets for each town. • Plan should allow for greater growth in Diss to ensure most efficient use of allocated land can be achieved and allow for additional housing to come forward in sustainable and well located sites. 	
22838 Public	Support	<ul style="list-style-type: none"> • Support options 1 & 2 and garden village proposal as despite long lead in times, it provides an amazing opportunity, it will also remove burden on Wymondham if contingency site needed. • Support Wymondham only being allocated 100 homes (subject to 1000 contingency homes). 	
23146 Hopkins Homes via Bidwells	Support	<ul style="list-style-type: none"> • Proposed settlement hierarchy and identification of main towns to accommodate 14% growth is supported • Development in main towns is key to sustainability of rural economy 	To confirm the overall housing requirement for Aylsham.

		<ul style="list-style-type: none"> • Aylsham is suitable for additional growth as is sustainable, has good range of shops, services and employment opportunities. Good transport links. 	
23199 Orbit Homes via Armstrong Rigg Planning	Comment	<ul style="list-style-type: none"> • Main towns have continued to be allocated a relatively low level of growth despite being most sustainable option for growth outside of Norwich. • Strategy fails to take advantage of potential of these settlements to sustainable grow and meet housing needs of catchment areas. • Have identified, in Policy 1 comments, need to allocate additional 4,000-6,300 dwelling above current proposals in GNLP. To meet this, we consider higher proportion of requirement should be directed to deliverable sites in Main Towns 	Consideration of overall housing numbers to meet Government guidance and to increase the proportion of development directed to main towns.

QUESTION 42

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	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)?
TOTAL NUMBER OF REPRESENTATIONS:	35
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	6 Support, 15 Object, 14 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Members of the Public referring to GNLPO104 - Land at Sandstone Way (small site) – 4 responses	3 Object 1 Comment	<ul style="list-style-type: none"> • The only significant prehistoric site in Roydon dates to the Iron Age and is found to the north of Sand Stone Way. Here, the cropmark of a ring ditch was noted on an aerial photograph in 1977. Partial excavation of the feature in 1981 recovered Neolithic flint tools and fragments of Iron Age pottery, and the site was interpreted as an Iron Age defended settlement. The owner of this land undertook the partial excavation in 1981 and has made a further partial excavation in recent years. It is believed that important artefact's remain in the ground. Before any development is approved it would be in the interest of the community for a full and independent archaeological excavation to be undertaken. • The applicant has failed to disclose that there is a public right of way crossing the access to the site (The Angles way), The close proximity of the development to the A1066 would subject the proposed properties to a high level of noise & vibration. The access to the site from the west is 	Consideration of the planning constraints, notably archaeological interest and highways constraints. To be undertaken with small sites and settlement boundary assessments.

		<p>from Tottington lane onto Sandstone way. This route is unsuitable; Tottington lane is a narrow country lane with no passing places.</p> <ul style="list-style-type: none"> • Sandstone Way is a cul-de-sac, with poor visibility at the junction, which is exacerbated at times by cars parked on the roadside. 	
Members of the Public – 1 response	Support	<p>Issues including:</p> <ul style="list-style-type: none"> • I know a new settlement is not generally a favoured approach, not least because of the long lead times involved. However, Silfield Village, (GNLP2168) if chosen, could be built with all necessary facilities and access onto the A11 growth corridor and not via the Wymondham railway bridge. Such a strategy might also obviate the need for Wymondham to provide for the 1000 homes contingency. 	Investigate the need and feasibility of a new settlement allocation.
Members of the Public – 5 responses	Object	<p>Issues including:</p> <ul style="list-style-type: none"> • Impact on wildlife of development in Harleston, such as hares; as well as a lack of infrastructure. • It may stretch credulity to include Long Stratton in Greater Norwich, but the reasons for doing so cannot include Diss, and do not try. The local plan provisions for Diss are in no way recognisable as a creative and workable plan. They are a recipe for the decline of Diss's role and regional centre as a historic market town. The establishment of a joint South Norfolk-Mid-Suffolk development and implementation unit, difficult but possible, and would provide for a matching basis of plan consideration across the county boundary. It would also permit a more imaginative and attractive solution to housing provision to include, perhaps, a new high-density yet garden village community. 	Consider the approach to the overall housing requirement across the market towns, and how to ensure their economies thrive.
Members of the Public – 3 responses	Comment	<p>Issues including:</p> <ul style="list-style-type: none"> • Wymondham is increasing its housing significantly, but to date no new schools are being provided. Health services are unable to cope /take on new patients. If development is to continue then the council needs to ensure that the infrastructures are in place to accommodate the new developments. 	Investigate further the infrastructure capacity of the main towns and the capacity to accommodate more housing; and, reappraise existing

			constraints, such as healthcare and education.
Wymondham Town Council	Object	Pleased that there is only a minimal additional proposed allocation of 100 homes in view of the significant number that already have approval and have not yet been built.	
Cheffins on behalf of RJ Baker & Sons	Comment	Queried the basis of the 1,000 dwelling contingency identified for Wymondham. There is scope for accommodating some further housing development at Wymondham, to reduce the contingency, and therefore provide a greater degree of certainty for all. It is unclear how the Local Planning Authority will monitor or measure housing delivery and what is the statutory mechanism for facilitating such a contingency?	Investigate further selection of a preferred contingency site for Wymondham.
Great Melton Parish Council	Comment	Great Melton has already experienced a surge in traffic volume due to the amount of development on the edge of Wymondham and Hethersett.	Investigate wider road network considerations associated to growth in Hethersett and Wymondham that affect Great Moulton Parish.
Smallfish on behalf of David Hastings	Object	We feel the method excluding small sites is not in line with the spirit and intention of Paragraph 68 of the NPPF and ask GNDP to Consider its position on small sites. We put forward a new site of approximately 0.5 hectares for consideration.	Investigate further the number of small sites in the local plan, as well as assess the newly submitted site.
Carter Jonas LLP on behalf of Mrs Janet Skidmore	Object	Issues including: <ul style="list-style-type: none"> • It is very unlikely that strategic extensions or garden villages would be delivered quickly enough to address a housing land supply shortfall in Wymondham in the short term. • As set out in the representations to the Site Allocations document for Wymondham sites, the promoted development at land south of Gonville Hall Farm in Wymondham (Ref. GNLP0320) is smaller than the strategic 	Investigate the ability of new settlement proposals to provide upfront infrastructure alongside policy compliant levels of affordable housing, and selection of a preferred

		extension sites and garden villages and it available for development, and as such it could meet the requirements for a contingency site to meet non-delivery elsewhere.	contingency site for Wymondham.
Lanpro Services	Object	See our answer to question 41.	
Glavenhill Ltd	Object	See our answer to question 41.	
Aylsham Town Council	Comment	<p>Issues including:</p> <ul style="list-style-type: none"> • There is an issue with transport through the Aylsham itself. The roads in the historic centre were not built for cars let alone the large buses that now regularly cross the town. • The town is fortunate to have the long distance trails of the Weavers Way and Marriots/Bure Valley Way. However, both these paths necessitate crossing the extremely busy A140 with no assistance to the pedestrian – this will need to be addressed. 	Investigate the potential for Town Centre improvements and better crossing points for the Marriots/Bure Valley Way trails.
Brown & Co	Comment	A number of these areas are subject to significant landscape and infrastructure constraints, which place delivery at jeopardy and could result in significant adverse impacts on local character and biodiversity. These issues have already impacted upon the delivery of a large proportion of the 'existing deliverable commitment'. Additional consideration should be given to the individual characteristics of each town and their suitability for additional development, and the scale of this.	Investigate the constraints to further development in the market towns, including issues such as transport, drainage, community facilities, historic environment, landscape impact, informal open space, and biodiversity net gain.
Bidwells on behalf of Welbeck Strategic Land	Object	<p>Issues including:</p> <ul style="list-style-type: none"> • Wymondham is a highly sustainable location for growth. It is questionable if the scale of growth forecast in both the Norwich urban area and fringe 	Investigate further selection of a preferred contingency site for

		<p>parishes, as well as the South Norfolk Village Clusters, can be considered deliverable in accordance with the NPPF.</p> <ul style="list-style-type: none"> • In order to ensure that the policies of the Local Plan are unambiguous in terms of how forecast growth will be met, it is recommended that rather than identify a contingency site, land in Wymondham should be allocated for housing development. • In the event that the decision to identify contingency sites remains (as per Costessey) it is recommended that a specific site is identified in Wymondham. 	<p>Wymondham, as well as overall housing numbers and its position in the settlement hierarchy.</p>
<p>Redenhall with Harleston Town Council – two comments</p>	<p>Object</p>	<p>Issues including:</p> <ul style="list-style-type: none"> • The Town Council feels that drainage, school capacity, healthcare provision and public transport should all be improved to an acceptable level before further development takes place. • We feel the housing proposed is too steep a growth rate given that the town already experiences infrastructure constraints. Existing drainage and sewerage infrastructure and surface water flooding are major problems in Harleston, particularly in the town centre. • We welcome the commitment in GNLP Policy 2 to ensuring development sites are required to minimise flood risk, including "reducing the causes and impacts of flooding. • When compared to Diss, Harleston has a disproportionate amount of growth, despite having less employment and services available. This underlines the need to create employment within Harleston, in order to avoid new residents travelling elsewhere for work, adding to pollution from cars. • We welcome the commitment in GNLP Policy 4 that "delivery of new services is a priority for the plan. The local primary academy caters for children from 3-11 years old. Recent data says the number of pupils attending was 465 with the school capacity set at 472. 	<ul style="list-style-type: none"> • investigate the constraints to further development in Harleston, including issues such as transport, drainage, community facilities, historic environment, landscape impact, informal open space, and biodiversity net gain.

		<ul style="list-style-type: none"> • With an already greater than average over 65's population we feel that the bus service should be radically improved. Harleston has very limited public transport to get to hospitals which are some distance away. 	<ul style="list-style-type: none"> • Review of the housing numbers for Harleston against other market towns, and across the overall settlement hierarchy.
Strutt & Parker LLP on behalf of M Scott Properties Ltd	Support	Aylsham, Diss and Harleston have been identified for lower levels of growth than Long Stratton and Wymondham. As such we strongly support the proposed new allocations in these towns which will help these rural communities to prosper and thrive. To this extent, in addition to the preferred allocations, we recommend that further consideration should be given to those sites identified as reasonable alternative allocations to further boost housing supply and support a prosperous rural economy.	Investigate the constraints to further development in the market towns, including issues such as transport, drainage, community facilities, historic environment, landscape impact, informal open space, and biodiversity net gain.
Armstrong Rigg Planning on behalf of Westmere Homes	Comment	<p>Issues including:</p> <ul style="list-style-type: none"> • We have concerns in respect of the comparatively low level of growth that is to be directed towards the Main Towns, a tier of the settlement hierarchy that historically yields sites that benefit from ease of delivery whilst lying in demonstrably sustainable locations. Aylsham is described at paragraph 312 of the GNLP as having a good range of shops and 	Review of the housing numbers for Aylsham against other market towns, and across the overall settlement hierarchy.

		<p>services as well as strong transport links to Norwich. Meanwhile, Harleston (which is to receive a greater level of growth both by way of allocation and cumulatively over the plan period) is characterised as having shops and transport links designed to meet a localised catchment only. To this end the level of growth now proposed at Aylsham appears disproportionately low. It is also noted that Anglian Water now has plans to increase capacity at the Aylsham water recycling centre, an infrastructure constraint that has held back the town's ability to grow in recent times.</p>	
Barton Willmore	Comment	<p>Issues including:</p> <ul style="list-style-type: none"> • Wymondham is a settlement at least twice the size of any subsequent settlement, and given the services available, it should be identified as a 'Large Main Town' in a means that separates it from the other towns. This would support the basis for the additional 1,000 homes identified for Wymondham as a 'contingency' location. • For 2026 and beyond the AMR identifies a supply of only 502 dwellings for the latter phases of South Wymondham (477 dwellings) and for London Road/Sutton Lane (35 dwelling). This level should be significantly increased given Wymondham's previous success in delivering homes. The 'contingency' for Wymondham should be enacted into this Local Plan now, and additional growth beyond the 1,000 dwelling contingency should be allocated to Wymondham given its sustainable location within the A11 and Cambridge to Norwich tech corridor. • At the time of adopting the Wymondham Area Action Plan, the existing education capacity constraint was stated by the examining inspector as a matter which justified an early review of the Plan and needed a solution. A solution to this is achievable, through the re-location of Wymondham High Sixth Form, and this is supported by Norfolk County Council Education. However, this is not currently being addressed by the adopted Development Plan, nor would it be addressed by the emerging GNLP in its 	<ul style="list-style-type: none"> • Investigate further selection of a preferred contingency site for Wymondham.

		<p>current form. The education ‘issue’ therefore must be dealt with through this plan-making process, and our client’s land offers the opportunity to address that constraint through the provision of sustainable new community that will also bring local shops and services, a new Primary School and a new public park.</p>	
Pegasus Group on behalf of Pigeon Investment Management Ltd	Comment	<p>Issues including:</p> <ul style="list-style-type: none"> • It is concerning that Diss ranks third out of the five main towns for proposed housing delivery in the plan period with 743 new homes proposed, 343 from existing commitments and 400 from new allocations, representing just 12% of new housing development to come forward at main towns. Diss should be providing additional housing through allocations in the GNLP in order to balance jobs with homes at the Main Towns. • Concern is raised over the deliverability of the brownfield site (GNLP0102 Frontier Agriculture Ltd) as this is an existing employment site in active use by the UK’s leading crop production and grain marketing business. 	<ul style="list-style-type: none"> • Investigate provision of new education capacity in Wymondham, including a new Sixth Form. <p>Review of the housing numbers for Diss against other market towns, and across the overall settlement hierarchy.</p>

		<p>The site provides one of the company's nationwide network of grain storage and processing facilities.</p> <ul style="list-style-type: none"> • Other deliverable alternatives are available such as land at Walcot Green Lane (GLNP1044) which will provide new green infrastructure linkages including circular footpath routes, market and affordable homes and self-build plots plus new highway improvements to Walcot Green Lane, all of which will provide benefits to existing and new residents alike. 	
Breckland District Council	Comment	Breckland District Council is also concentrating growth around the Cambridge-Norwich Corridor and at Dereham.	
Highways England	Comment	In respect to Wymondham: The proposed reasonable alternative site (contingency) will require a new junction onto the A11. Whilst this is agreeable in principle it will need further investigation. We welcome the opportunity to respond to the Local Plan consultation and we look forward to continued participation in future consultations and discussions. In the meantime, if you have any questions with regards to the comments made in my letter, please do not hesitate to contact me.	Consider the degree to which housing numbers in Wymondham, and site selection options, are contingent on Highways England advice, and a new A11 junction.
Strutt & Parker LLP	Comment	<p>Issues including:</p> <ul style="list-style-type: none"> • We strongly support the proposed allocations in these towns which will help these rural communities to prosper and thrive. In particular, we strongly support the proposed allocation of sites such as the land at Briar Farm, Harleston (GNLP2136) which are included as preferred options and provide for positive growth in relation to the settlement hierarchy, infrastructure and local constraints. In respect of our clients site, • Land at Briar Farm, Harleston it will not only provide much needed housing, but also specialist homes C3 care accommodation, along with a retail area, and extensive open space and recreational facilities. 	To confirm the overall housing requirement for Harleston, and to further understand policy requirements of preferred allocations sites.
Rosconn Group	Comment	<p>Issues including:</p> <ul style="list-style-type: none"> • it is apparent that the strategic allocation at Long Stratton has been severely delayed, as has progress on delivering the bypass. It is therefore 	Investigate the delivery of the Long Stratton AAP commitment, and assess

		<p>unlikely that any meaningful housing numbers will be delivered from these sites within the next 5 years and it is difficult to see more than 100 dwellings being delivered by 2026 compared with the 1,800 envisaged in the 2016 AAP. In such circumstances, RSL consider that scope to bring forward a further housing site within the settlement should be given serious consideration. This would have potential benefits in helping to address short term local housing needs.</p> <ul style="list-style-type: none"> • RSL are promoting land to the south of Flowerpot Lane, Long Stratton. This is an unconstrained site which is well-related to the south western edge of the settlement and is available, deliverable and suitable. It offers scope for a smaller site for approximately 150 dwellings, or a larger scheme in the region of 700 dwellings. 	<p>the proposals for new allocations in Long Stratton.</p>
Strutt & Parker LLP	Support	<p>Issues including:</p> <ul style="list-style-type: none"> • We strongly support the proposed allocations in these towns which will help these rural communities to prosper and thrive. • In respect of Diss, as outlined above, we support the approach to allocate the sites located to the north of the town under Policy GNLPO250/0342/0119/0291, Land north of the cemetery, West of Shelfanger Road and East of Heywood Road, Diss. The sites combined comprise approximately 8.91 hectares for residential development and could likely accommodate 200 dwellings. 	<p>To confirm the overall housing requirement for Diss, and to further understand policy requirements of preferred allocation sites.</p>
Pegasus Planning Group	Support	<p>Our client has a proposed allocation site in Diss (policy GNLPO250/0342/0119/0291) and supports the identification of a housing requirement in Diss but believes that the Plan should allow for greater numbers than has been identified to ensure that the most efficient use of allocated land can be achieved and to allow for additional housing to come forward in locations that are already identified as being sustainable and have access to supporting facilities.</p>	<p>To confirm the overall housing requirement for Diss, and to further understand policy requirements of preferred allocation sites.</p>

David Lock Associates on behalf of Orbit Homes	Object	<p>Issues including:</p> <ul style="list-style-type: none"> • We object to the lack of consideration of Wymondham as a strategic growth location. As has been extensively covered elsewhere in these representations, for a variety of reasons Wymondham is an excellent location for accommodating strategic scale growth. It is the largest settlement in the GNLP area outside the Norwich Urban Area. It has a prominent location at the heart of the Tech Corridor. It benefits from immediate access to the recently improved A11. It is positioned on the Norwich Cambridge Railway line. 	Investigate the need and feasibility of a new settlement allocation.
Bidwells on behalf of Hopkins Homes	Support	<p>Issues including:</p> <ul style="list-style-type: none"> • We strongly support the proposed allocation of at least 300 dwellings within Aylsham. GNLP0311/0595/2060 is suitable, available, achievable and viable, and is therefore deliverable within the plan period. Development in this location would represent sustainable development, as defined within the National Planning Policy Framework. Aylsham, as a Main Town, with the fourth highest level of shops and services outside Norwich, is already acknowledged as a highly sustainable location for residential growth, as evidenced through the significant quantum of development that has been approved in the last decade. 	To confirm the overall housing requirement for Aylsham, and to further understand policy requirements of preferred allocations sites.
Armstrong Rigg Planning on behalf of Orbit Homes	Object	<p>Issues including:</p> <ul style="list-style-type: none"> • Orbit Homes objects to the approach to development in Long Stratton. The justification provided is therefore that because Long Stratton is allocated to grow by c.1,800 homes in the current Joint Core Strategy (2011) and Area Action Plan (2016), it should not be allocated any additional dwellings. This is not a justifiable approach as it fails to accept the failure of the 1,800 home allocation to deliver any new homes despite being a key component of the current development plan and not the emerging Local Plan. The key issue with the delivery of the 1,800 allocation in Long Stratton is that it is reliant on the delivery of a new bypass before the occupation of the 250th new dwelling, but the 	Investigate the delivery of the Long Stratton AAP commitment, and assess the proposals for new allocations in Long Stratton.

		<p>development is unable to viably deliver this bypass without significant government funding and no decision on this funding has yet been made.</p> <ul style="list-style-type: none"> • The need to identify an additional deliverable housing site is particularly acute in Long Stratton. See details for Land south of St Mary's Road, Long Stratton (ref. GNLP0509). 	
Starston Parish Council	Object	<p>Issues including:</p> <ul style="list-style-type: none"> • Housing density & road widths in new housing developments - is the density of housing too high and roads too narrow on the new housing estate near Harleston Industrial Estate, • Town infrastructure to support new housing developments. • Impact of increased traffic on the rural/single track roads around Harleston. Significant additional traffic comes through Starston from Harleston to join the A140 at the Pulham or Morningthorpe roundabouts. 	To confirm the overall housing requirement for Harleston, and to further understand policy requirements of preferred allocation sites.

QUESTION 43

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 43 – Do you support, object or wish to comment on the approach for the key service centres overall? Please identify particular issues.
TOTAL NUMBER OF REPRESENTATIONS:	18
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	3 Support, 5 Object (one was duplicated), 10 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Environment Agency	Comment	The plan must specifically address mitigation and compensation for loss of natural habitats. Would like target % of GI per development.	<ul style="list-style-type: none"> NB all of the summary in Q43 relates to general issues, not KSC specific
Highways England	Comment	Where proposed growth is near or close to A11/A47, appropriate transport assessments will be needed	<ul style="list-style-type: none"> Added policy content for selected sites?
East Suffolk Council	Support	We support the approach in The Key Service Centres policy.	
Hingham PC (duplicated)	Object	There is no definition of a KSC.	<ul style="list-style-type: none"> Consider clarifying definition in glossary.
Bidwells	Support	Overall approach to KSCs is supported, and the identification of 21% increase in growth for KSCs, which will result in them occupying 8% of total housing growth. Fully support Hingham as KSC. It has a range of services	Support for KSC approach, particularly Hingham, noted.

Brown & Co	Comment	Concerns regarding the deliverability, and sustainability of additional “bolt-on” developments (presumably refers to housing estates)	<ul style="list-style-type: none"> Capacity of local services
Crown Point Estate	Object	Arbitrary limit of 3 dwellings for windfall sites, could be as high as 10. Policy should relate to character and appearance, natural boundaries on the ground.	<ul style="list-style-type: none"> Consider windfall policy limit
Glavenhill	Object	The KSCs don’t have a high enough share of the growth. Too much is directed at village clusters, which have fewer services.	<ul style="list-style-type: none"> Consider capacity of KSCs to accommodate more growth.
Hardingham Farms	Object	The KSCs don’t have a high enough share of the growth. Too much is directed at village clusters, which have fewer services.	<ul style="list-style-type: none"> Consider capacity of KSCs to accommodate more growth.
Lanpro	Object	The KSCs don’t have a high enough share of the growth. Too much is directed at village clusters, which have fewer services.	<ul style="list-style-type: none"> Consider capacity of KSCs to accommodate more growth.
Larkfleet Homes	Support	Loddon is sustainable with good road access and facilities	<ul style="list-style-type: none">
Barton Willmore	Comment	It is unclear why settlements outside NPA/Core Area have been chosen for allocations over those within it.	<ul style="list-style-type: none"> Consider distribution of growth within KSCs
Gladman Developments	Comment	Overall approach to KSCs supported. Poringland/Framingham Earl is second largest KSC is excellent candidate for additional growth.	<ul style="list-style-type: none">
Gladman Developments	Comment	Level of growth is a minimum, housing levels in KSCs falls short and should be substantially increased. Poringland has no new allocations, this will affect the plan’s flexibility re land supply.	<ul style="list-style-type: none"> Consider capacity of KSCs to support more growth

Pegasus Group	Comment	Agree with broad approach but should consider additional small and medium sized sites. Loddon/Chedgrave should receive allocations	<ul style="list-style-type: none"> • Consider capacity of KSCs to support more growth
Pigeon Investment Management	Comment	Of 3,253 homes in KSCs, only 515 are new allocations (others being commitments).	<ul style="list-style-type: none"> • Consider capacity of KSCs to support more growth • NB much of this rep relates to Hethersett
Pigeon Investment Management	Comment	Many KSCs have disproportionately low levels of development. Need to demonstrate constraints cannot be addressed.	<ul style="list-style-type: none"> • Consider capacity of KSCs to support more growth
Member of public	Comment	'green belt' (strategic gap?) between Wymondham and Hethersett should not be encroached any more than it currently is.	<ul style="list-style-type: none"> • Potential allocations in strategic gap

QUESTION 44

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 44 – Do you support, 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.
TOTAL NUMBER OF REPRESENTATIONS:	26 (some possibly moving over from Q43)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	6 Support (1 duplicate), 8 Object, 12 Comment (one duplicate with object)

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Members of public - various	Support	<ul style="list-style-type: none"> Local roads and services could not cope with more housing in Brundall, over that which is already committed Local roads and services could not cope with more housing in Poringland, over that which is already committed Linear formation of Poringland should not be allowed to extend 	
Framingham Earl PC	Support	<ul style="list-style-type: none"> Infrastructure has reached saturation point and committed sites should be built out before new ones are allocated 	
Bidwells	Support	<ul style="list-style-type: none"> Hingham is a sustainable location with a range of services to support day-to-day living 	
Members of the public	Object	<ul style="list-style-type: none"> Poringland village roads and services are at capacity and all new housing sites should be refused Highway and footpath capacity in Hingham must be improved and pedestrian crossings provided before any new development. 	<ul style="list-style-type: none"> Highway views and potential for additional/improved footpaths and crossings in KSCs

		<ul style="list-style-type: none"> • Development along the B1108 in Hingham will worsen surface water issues elsewhere 	<ul style="list-style-type: none"> • Has surface water issue been addressed in policy?
Hopkins Homes	Object	<ul style="list-style-type: none"> • GNLP does not allocate any new homes at Wroxham, and neglects the needs of older residents as identified in the NP. Conflicts with HELAA findings. 	<ul style="list-style-type: none"> • Have NP policies been considered fully?
Barton Willmore/Quantum Land	Object	<ul style="list-style-type: none"> • No housing growth in Brundall, despite proximity to Norwich • Balance of distribution in settlement hierarchy is wrong at KSC level, not enough growth 	<ul style="list-style-type: none"> • Consider capacity of KSCs for additional growth • Move to Q43?
Nicole Wright	Object	<ul style="list-style-type: none"> • Hethersett has highest deliverable commitment and lies in a key growth corridor, with insufficient new supporting infrastructure. 	<ul style="list-style-type: none"> • Consider the need for additional community /social infrastructure in SW Norwich
Crown Point Estate	Object	<ul style="list-style-type: none"> • Poringland needs to grow, or it will not meet needs for affordable housing. 	<ul style="list-style-type: none"> • Consider level of commitment/new allocations
Hingham PC	Object	<ul style="list-style-type: none"> • Hingham has several services that are inadequate to support growth and the road and footpath network are poor with few pedestrian crossings. • Car parking capacity needs to be increased and the policy wrongly states 'good transport links'. • Need a commitment to improving infrastructure. 	<ul style="list-style-type: none"> • Highway views and potential for additional/improved footpaths and crossings in Hingham • Opportunity for car parking in Hingham?
Members of the public	Comment	<ul style="list-style-type: none"> • Poringland services are at full capacity • [ASSUME REEPHAM] increase in population will affect schools and GP and water treatment works, and destroy wildlife habitat 	<ul style="list-style-type: none"> • Ensure new allocations address any service shortfall
Hardingham Farms	Comment	<ul style="list-style-type: none"> • Support allocation in Hingham 	

Caistor St Edmund PC	Comment	<ul style="list-style-type: none"> Parish Council strongly supports rejection of sites and endorses decision not to develop Poringland beyond commitments. 	
Hemblington PC	Comment	<ul style="list-style-type: none"> Pleased no further housing in Hemblington, concerned at being linked with Blofield Heath. 	<ul style="list-style-type: none"> Consider link between Hemblington and Blofield
Barton Willmore	Comment	<ul style="list-style-type: none"> Unclear why Poringland, Hethersett, Brundall and Blofield, plus Acle don't have more growth. 	<ul style="list-style-type: none"> Consider level of growth in KSCs
Hopkins Homes	Comment	<ul style="list-style-type: none"> Mulbarton should be identified as a KSC; its population is higher than over half KSCs and has good range of services 	<ul style="list-style-type: none"> Review settlement hierarchy??
Pigeon Investment Management Ltd/Pegasus Group	Comment	<ul style="list-style-type: none"> Concerned that Hethersett is not identified for additional allocations. Alternative site could provide homes and community facilities including sport and education, GI and care village. 	<ul style="list-style-type: none"> Consider level of growth in KSCs Consider need for community facilities/GI
Highways England	Comment	<ul style="list-style-type: none"> Blofield sites may have significant impact on A47 and early assessment on road and junction is required. 	<ul style="list-style-type: none"> Ensure policy requirement for early assessment of A47 and junction
Pegasus Group/Halsbury Homes	Comment	<ul style="list-style-type: none"> Loddon/Chedgrave – more small/medium sites needed, especially following miscalculation of standards method figure and historic under delivery of strategic sites. 	<ul style="list-style-type: none"> Consider level of growth in KSCs
Pigeon Investment Management Ltd	Comment	<ul style="list-style-type: none"> Concerned that Reepham is not identified for additional allocations; it has lowest proportional rates of growth of any KSC. Alternative site could provide more employment, GP surgery. 	<ul style="list-style-type: none"> Consider level of growth in KSCs

QUESTION 45

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 45 – Do you support or object or wish to comment on the overall approach for the village clusters? Please identify particular issues.
TOTAL NUMBER OF REPRESENTATIONS:	50
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	8 Support, 23 Object, 19 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
CPRE Norfolk South Norfolk Green Party Hempnall Parish Council Saxlingham Nethergate Parish Council Salhouse Parish Council	Object	<p>Summary of main points:</p> <ul style="list-style-type: none"> • Village clusters appear to be an artificial concept invented to justify the dispersal of housing into the countryside • Difficult to understand the justification of changing JCS hierarchy, particularly eliminating categories of Service Village, Other Villages, smaller rural communities and the countryside which allowed for a more nuanced approach to housing allocations • JCS settlement hierarchy should be offered as an alternative approach in the draft GNLP • If village clusters are adopted it will be important to limit these to areas within settlement boundaries and to designate remaining rural areas as countryside. This would require a policy similar to JCS Policy 17. • Different approach for village clusters between Broadland and South Norfolk is not acceptable. A maximum number should be provided for both areas rather than the current ‘up to 480’ in Broadland and ‘minimum of 1200’ in South Norfolk. 	<p>Should retaining JCS hierarchy have been offered as an alternative approach in the draft plan?</p> <p>Is there a need for an additional policy to protect open countryside like Policy 17 in the JCS?</p>

		<ul style="list-style-type: none"> • Concern that village clusters in South Norfolk will not be scrutinised to the same degree as those in Broadland due to separate South Norfolk document • Concern about the use of primary school catchments as a 'proxy for social sustainability' with no other sustainability measures being taken into account when deciding on the amount and location of housing within clusters 	Need to resolve issues of 'up to 480 ' new houses in Broadland and a 'minimum of 1200 new houses in South Norfolk
Hainford Parish Council	Object	<p>Do not support village clusters policy.</p> <ul style="list-style-type: none"> • Most villages able to access services without the need to cluster • Policy intended to enable wider development which will result in loss of existing settlement boundaries and risk of unnecessary development • Aware that redefinition of settlement boundaries to be considered at a later stage in the plan 	
Brockdish & Thorpe Abbots Parish Council	Object	<p>No justification for the cluster plan or quantity of development. No criteria relating to suitability for development. A political way to satisfy urban areas. Landowner/builders given initiative in choosing sites. No community involvement in the plan</p> <p>Despite extensive consultation the GNLP South Norfolk Council has decided to embark on a separate village clusters plan looking for a minimum of 1200 houses which exceeds the statement at the SNC presentation that the GNLP seeks 9% of housing in village clusters for the whole GNLP area. There is no explanation offered for this plan or the quantity of housing.</p> <p>If the cluster exercise is to have any credibility there must be reasoning for the quantity of houses being sought, there must be a planning rational for identifying clusters and how they work together, there must be a set of criteria relating to suitability for development and there must be a process of community consultation.</p>	
Marlingford and Colton Parish Council	Object	<p>The village clusters concept is entirely unsustainable as it relies upon accessing pockets of geographically disparate infrastructure which will increase car journeys, directly contrary to the plans stated environmental objectives. The SNC minimum of 1,200 houses should be corrected to maximum otherwise it creates an open ended free for all</p>	

			Need to resolve issues of 'up to 480 ' new houses in Broadland and a 'minimum of 1200 new houses in South Norfolk
Bunwell Parish Council	Comment	Do not accept that village clusters should be based on primary schools, the strategy should satisfy the housing needs for all generations. Norfolk villages have different attractions and benefits. Many families dislike block development so why the single site approach to clusters. Development close to a school doesn't guarantee a family purchase of a walk to school. All villages sites should be considered on their own merits.	
Reedham Parish Council	Object	The concept of village clusters seemed to have been invented to justify the dispersal of housing in the countryside. The change from JCS settlement hierarchy is not explained. It seems unfair that villages clusters in Broadland are being treated differently to those in South Norfolk. A range of sustainability measures should be used to calculate the level of housing required in village clusters not just primary school places.	
Barford Parish Council	Object	Strong objection to lack of consideration of village cluster locations in South Norfolk in the GNLP consultation, particularly those around Barford and Wrampingham. Lack of transparency Many of the proposed village cluster locations are on green belt, outside current development areas and often in flood plain and GI corridor areas. Village clusters seem to be a route to getting round normal planning conditions Fully agree with CPRE comments that village clusters appear to be an artificial concept invented to justify the dispersal of housing into the countryside.	
Mulbarton Parish Council	Object	"Village Clusters" appear to be an artificial concept, invented to justify the dispersal of housing into the countryside, which will not benefit Mulbarton due to the large amount of recent development in the village. MPC are concerned that completely different approaches are being taken by SNC and Broadland Council in the same plan.	

Sworders on behalf of multiple clients	Comment	Basing the housing allocation for each village on a single criterion such as the primary school catchment is very limiting and can only ever be a snapshot of an ever changing situation and does not take account of the potential for new housing to fund growth and improvements to the schools or other community facilities. The amount of housing allocated to village clusters should be based on a much wider range of criteria. The current approach limits housing to the part of the cluster where the school is located, precluding allocations within any of the other villages in the cluster, in this sense the village cluster concept is ineffective and results in limited distribution rather than housing distributed and shared across the cluster.	
John Long Planning on behalf of multiple clients	Support	Support the approach to village clusters in South Norfolk and wish sites at Seething and Alington to be considered through the Village Clusters document.	
Jayne Cashmore (Agent) on behalf of client	Comment	The policy should make mention of prioritising brownfield development	Consider whether policy should be amended to mention prioritising brownfield development
Stephen Flynn on behalf of Lanpro Services and Glavenhill Ltd	Comment	<p>Support the concept of village clusters as a mechanism to allocate new housing in accessible rural locations and support sustainable patterns of growth, however do not support the significant amount of growth to be directed to village clusters, particularly 1200 (15% of all new allocations) in small settlements in the rural area of South Norfolk. Without knowing whether sites are accessible and sustainable in all respects there is concern that the approach is neither sustainable or compatible with objectives to tackle climate change.</p> <p>A more sustainable approach (in line with objectives and vision set out in the Growth Strategy) would be to allocate 400 of the South Norfolk 1200 to cluster villages and key service centres within the old NPA part of South Norfolk and an addition 500 as the first phase of a new settlement at Hethel in the Cambridge – Norwich Tech corridor. The remaining 300 should then be allocated to small cluster villages in the more rural parts of South Norfolk</p>	

		<p>The current strategy could have negative impacts in terms of increasing journeys by private car and will place greater demand on small local schools and services. Within a new settlement social infrastructure can be properly planned and funded from the outset.</p> <p>As currently proposed the settlement hierarchy presents an unambitious variation of the JCS with an unjustified increase in rural dispersal</p>	
Brown & Co	Support	<p>Support for the distribution of some growth to smaller settlements to support vibrancy and sustainability. Clusters based on schools ability to expand but in some areas schools are at capacity or landlocked so it is considered that further work is required to ensure that levels of development are deliverable and would not result in students needing to be transported to other areas.</p>	
Barton Willmore on behalf of KCS Developments	Object	<p>Do not support overall approach to village clusters.</p> <p>Firstly, object to the grouping together of several settlement sizes into one level within the hierarchy. There are clear differences between settlements within village clusters and it needs to be recognised that larger villages such as Spooner Row should accommodate more growth than smaller villages which were previously lower in the settlement hierarchy.</p> <p>Secondly, concerns about statement within policy 7.4 welcoming sites between half and one hectare. Sites of this size are likely to be more appropriate within other villages or smaller rural communities and there is no recognition that settlements currently categorised as service villages could accommodate a greater level of growth e.g. Spooner Row which has a wide range of services and facilities.</p> <p>Promoting five parcels of land at Spooner Row with an overall aggregate site area of 19.5ha and a capacity of 173 to 246 dwellings.</p>	

MDPC Town Planning	Support	Happy with general approach. It is understood that SNC are doing their own cluster policy consultation and there will be an opportunity to make further comments at the appropriate time.	
Pegasus Group on behalf of Pigeon Investment Management Ltd (submitted multiple times representing different sites)	Comment	<p>The GNLP proposes a disproportionately high level of growth in village clusters, a significant proportion of which are on as yet unknown sites to be identified in the South Norfolk Village Clusters Plan.</p> <p>Village clusters are by definition less sustainable locations for growth and development should be restricted to that necessary to support rural or local needs, however more growth is directed to village clusters than key services which have a relatively good range of services and facilities. The needs of rural areas would be more sustainably provided through development at Key Service Centres and Main Towns contrary to the GNLP strategy.</p> <p>Reliance upon a specific contribution from unknown sites in South Norfolk may require unsustainable sites to be brought forward rather than identifying more sustainable sites now. The absence of specific sites being identified will also adversely affect the housing land supply position and provide a lack of certainty going forward.</p>	
Armstrong Rigg on behalf of Westmere Homes	Comment	<p>The GNLP should seek to take an evidence based approach towards the identification of the capacity of every settlement across the plan area to accommodate growth. Sites that are both deliverable and can enhance sustainability through the delivery of a proportionate number of homes should be identified as allocations in the plan. We are pleased to see that such an evidence led process has been closely observed in directing growth towards the village cluster tier in Broadland.</p> <p>The Hainford and Stratton Strawless cluster is currently not proposed to receive any growth but the proposal GNLP2162 at Harvest Close is now able to overcome the single principle constraint that led to that decision. As the housing figure for the village cluster tier has been identified through a 'bottom up' approach it is clear that additional sites can be identified without conflicting the GNLP's spatial strategy.</p>	

		<p>The approach in South Norfolk is far from evidence based and seeks to prescribe an arbitrary figure of 1200 dwellings with allocations to be identified in a separate plan to be produced by South Norfolk Council at a later date. This risks requiring South Norfolk to allocate sites that are either undeliverable or unsustainable contrary to the NPPF.</p> <p>The allocation in South Norfolk village clusters must be brought back into the GNLP and based on a thorough assessment of need and capacity. This may result in the redirection of a proportion of growth towards Broadland villages or higher tiers of the hierarchy.</p>	
Mrs Nicole Wright	Comment	<p>We support this policy. However, guidance for employment development outside settlement limits is required in the policy.</p> <p>Reference required to custom build homes. Village clusters will tend to be the location sought by self-build and custom house builders.</p>	<p>Consider adding guidance re: employment development outside settlement limits and reference to custom build homes into the policy</p>
Mrs Georgina Brotherton on behalf of Horsham Properties Ltd	Comment	<p>Policy 7.4 includes a table setting out allocated employment areas within all village clusters. The existing employment allocation (Ref HNF3) land West of Abbey Farm Commercial Park should be included given that the site is allocated and is proposed to be carried forward. The site owners intend to submit a planning application in the Spring.</p> <p>As well as identifying specific allocated employment sites Policy 7.4 states that other small scale employment development will be acceptable within development boundaries or through the reuse of rural buildings. This policy is not flexible enough to meet the changing requirements of businesses or facilitate development. Policy should be amended to allow for the expansion of small and medium sized employment sites, which would align with NPPF policy. Penultimate paragraph of Policy 7.4 should be amended as follows:</p>	<p>Need to include Abbey Farm Commercial Park in list of existing employment allocations?</p> <p>Consider amending Policy 7.4 as suggested</p>

		<i>Other small-scale employment development will be acceptable in principle elsewhere within village development boundaries or through the re-use of rural buildings or through the potential expansion of existing small and medium sized employment sites (LPP suggested text) subject to meeting other policies in the development plan.</i>	
Gladman Developments	Comment	General support for this division of the hierarchy and the settlements contained within it. However the level of growth should be proportionate to the level of services available and not undermine the wider spatial strategy which centres on the most sustainable locations within the 3 authorities..	
Pegasus Planning Group on behalf of multiple clients	Object	Concern that 1200 homes are proposed to be delivered on as yet identified sites that are to be allocated through a separate South Norfolk Village Clusters document. This document has no agreed timescale for production and does not feature in current LDS. This adds uncertainty and delay to the delivery of these homes and it is unclear whether they will be delivered in sustainable locations or in a form that could fund sufficient infrastructure or deliver appropriate levels of affordable housing. This reliance on a further plan process departs from the GNLP single plan strategy with inherent adverse consequences for sustainable development. This is not an appropriate strategy.	
Bidwells	Support	Strong support for the identification of Horsham and Newton St Faith as a village cluster. The cluster benefits from a range of services and amenities, close proximity to Norwich and the Broadland Northway. The identification of Horsham and Newton St Faith as a village cluster supports the plan aspirations of directing growth to locations with good access to services and employment and providing a variety of housing types and tenures.	-
Savills on behalf of Barratt David Wilson Homes	Object	Response reiterates comments made to question 13 e.g.: Overall the proposed distribution of growth including the focus on the area around Norwich is considered to be the most appropriate strategy and is supported.	Consider revisiting Horsford's position in the hierarchy?

		<p>However the limited amount of growth assigned to Horsford is not supported. Despite being a village cluster it is the 9th most populous settlement across the 3 Districts and recognised as being a sustainable location for additional residential development. Further growth should be providing to recognise and reflect the recent growth of Horsford and to yet further improve the sustainability of the village.</p>	
<p>Saving Swainsthorpe Campaign</p>	<p>Object</p>	<p>The concept of village clusters is novel but the plan seems to assume it is an accepted concept and has some legitimacy. The use of primary school catchments as a proxy for sustainability of neither explained or justified and represents a crude measure for planning and development will be permitted without the infrastructure to support it. The production of a separate (possibly unconnected) plan typifies the disjointed approach.</p>	
<p>East Suffolk Council</p>	<p>Support</p>	<p>Any housing development in villages close to the former Waveney area is highly likely to impact services and facilities in Beccles and Bungay and traffic on the A146, an important link between Lowestoft and Norwich. Junction on the A146 near Beccles will be close to capacity by the end of the Waveney Local Plan period in 2036.</p> <p>The future allocation of 1,200 new dwellings in village clusters in a South Norfolk Village Clusters Housing Allocations Document should take into consideration the impact on services and facilities in East Suffolk and the overall combined impact of proposed development in South Norfolk and the former Waveney areas on the A146. The Council would wish to be notified of progress on the South Norfolk Village Clusters Housing Allocations Document.</p> <p>Support for the overall support of allocating housing growth in villages to promote social sustainability.</p>	
<p>Norwich Liberal Democrats Cllr Judith Lubbock</p>	<p>Object</p>	<p>Support the continuation of the settlement hierarchy in the JCS with the primary focus of planned development in the Norwich Urban area. The level of 9% of total housing growth in village clusters in rural areas is hard to reconcile with Section 4 and Policy 7.1 and will have impacts for infrastructure provision. This approach is inconsistent with emphasis on</p>	

		<p>addressing climate change and reducing carbon emissions undermining the ability of the plan to deliver sustainable growth.</p> <p>The intention to site additional housing in the most rural parts of South Norfolk in village clusters in the GNLP but at the same time excluding details of those sites or evidence as to the justification of such a policy may leave the GNLP vulnerable to challenge on soundness grounds.</p>	
Suffolk County Council	Comment	<p>The delivery of development through a separate South Norfolk village clusters plan is of interest. SCC would welcome communication on how Suffolk's education infrastructure may be affected by increased pupil demand arising from new development to proactively promote synergy for schools cross boundary. Relevant existing provision, catchment schools and associated mitigation will need to be considered in respect to upcoming development plans.</p> <p>Regarding Early Years provision, the wards of Fressingfield and Palgrave are the nearest wards to Harleston and Diss. Considering the upcoming growth in the area, forecasts for Fressingfield show an overall potential deficit in places. Upcoming growth is unlikely to be accommodated and alleviated by Suffolk provision due to existing pressure and Full Time Employment provision.</p>	NCC Children's Services to liaise with Suffolk County Council re: cross boundary education provision
Breckland District Council	Comment	The following allocations are close to Breckland and welcome further discussions as these progress. In particular Easton and Honingham,	
Member of public	Support	The Policy 7.4 approach to allowing additional housing development within settlement boundaries is supported	-
Member of public	Support	Support the principle of villages clusters particularly villages to the south of Poringland which use the B1332 for commuting. These villages are becoming aged, pale and affluent and bereft of services. This strategy may be the only method of preventing them becoming 'ghosts'.	-
Member of public	Object	Villages, particularly in South Norfolk, cannot soak up this additional housing quantity for the same reasons that many of the service areas cannot. Villages such as Stoke Holy	

		Cross, Brooke, Woodton, Kirstead etc rely on the infrastructure of the Poringland/Framingham Earl area which cannot support the developments already going on therefore these villages cannot support further housing either.	
Member of public	Object	Concerned that clusters could result in dispersed housing into the countryside	
Member of public	Object	Agree with Hainford Parish Council response. Concerned that records of flood incidents have been clustered with Spixworth and Horsham St Faith, thus watering down flood statistics for Hainford and hiding problems.	Investigate claim about the recording of flood incidents
Member of public	Object	The approach to village clusters of 4024 or 9% of all growth will negatively damage the character and scale of villages without achieving social sustainability by supporting rural life and services. Add in windfall development, 3 dwellings a parish and the Plan ticks all the boxes for a free for all!	
Member of the public	Object	The amount of housing especially in South Norfolk is too much, and will by definition be on greenfield sites, reducing arable land and amenity of the countryside. The removal of the protection of other villages by joining villages up to create larger communities without any infrastructure is unfortunate and misplaced. Norfolk's unspoilt villages and countryside will be lost in the name of economic development.	
Orbit Homes via David Lock Associates	Object	<p>Concern regarding the approach to allocation across numerous DPD's. Specifically the intention of South Norfolk Council to prepare a separate Village Clusters Plan.</p> <p>Three points of objection:</p> <ol style="list-style-type: none"> 1. The GNLP is a joint plan and decisions on allocations should be made in the context of meeting whole plan objectives, evidence and SA relating to the plan area as a whole. The decision making process regarding the South Norfolk Village Cluster allocations is neither logical nor transparent. This undermines the GNLP whole plan objectives and SA conclusions and risks the soundness of the Village Clusters document and the GNLP as a whole. 2. The Village Clusters document proposes to allocate sites for c.1,200 dwellings. If tests of soundness are to be met the options for how this requirement might best be met in a way that meets wider plan objectives can only be considered as an inherent part of the GNLP. 	

	<p>3. The timing of the South Norfolk Village Clusters document has led to the postponement of assessment of sites. Again this risks undermining the overall soundness of the evidence base, SA and content of both plans as the assessment of cumulative impact or reasonable alternatives cannot be done in a holistic or robust manner</p> <p>Furthermore some sites promoted within and around village clusters are strategic in nature and scale e.g. site 2101 at Spooner Row. Although this site has been assessed by the HELAA it has not been subject to the same detailed site assessment process as other sites and will instead be considered by South Norfolk Council in a plan with no timescales or objectives.</p> <p>The failure to consider such strategic sites compromises the growth strategy in a number of ways:</p> <ul style="list-style-type: none"> • It cannot fully consider all of the strategic infrastructure required within the plan period • It assumes that village clusters will remain at the same position within the GNLP settlement hierarchy • It prevents the GNLP growth strategy being tested against all available reasonable alternatives <p>We object to the approach proposed within the draft GNLP Sites document to allocate 1,200 dwellings within a separate DPD document on the grounds that it has led to a flawed site assessment process which compromises the proposed growth strategy and the soundness of the GNLP as a whole.</p> <p>We suggest that to remedy the situation and to ensure that the GNLP can move effectively through Regulation 19 and Examination, those sites to be allocated for development at the village clusters in South Norfolk should be considered and allocated as part of the GNLP Sites document. There is an opportunity to undertake the necessary assessment (in tandem with the additional SA work we suggested is also needed to test reasonable spatial strategy alternatives to Policy 12) in the period between the end of consultation</p>	
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		<p>(Regulation 18c) and the next round of consultation (Regulation 19) scheduled for January/February 2021.</p> <p>If GNDP continue to pursue a separate South Norfolk Village Clusters document as a separately-assessed and unilaterally-determined DPD, then we have serious reservations over the soundness of the Plan as a whole and its likely success at Examination."</p>	
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QUESTION 46

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	Question 46 - Do you support or object or wish to comment on the approach for specific clusters?
TOTAL NUMBER OF REPRESENTATIONS:	64
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	5 Support, 25 Object, 34 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
BLOFIELD HEATH CLUSTER			
Member of the public	Comment	Hemblington is classified as a rural village and is a distinct unit from Blofield Heath, part of a service village. They should be treated separately not as a cluster which does not conform to existing administrative units. It is not clear that Hemblington school has a defined catchment area, this is therefore a questionable planning criterion.	
BUXTON WITH LAMAS CLUSTER			
Lanpro Services Ltd on behalf of Glavenhill Limited	Object	Concerns regarding the over reliance on the wider village clustering approach in so far as it applies/may apply to the more remote rural areas beyond the former Norwich Policy Area advocated under Policy 7.4. Without evidence to the contrary there could be a clear disconnect between the main employment and service centres such as Scottow Enterprise Park and the more rural village clusters. In the absence of a clear growth strategy and information regarding the cluster locations my client wishes to raise an objection and contends that a significant part of this defined/undefined	

		planned rural cluster growth should be relocated adjacent to the village of Badersfield and Scottow Enterprise Park.	
COLTISHALL CLUSTER			
Coltishall Parish Council	Object	In the light of the landmark ruling regarding Heathrow Airport expansion, ruling it illegal as it failed to consider Climate changing issues and adherence to CO2 emission as agreed in the Paris agreement, this has thus been proved a legally binding commitment. No such assessment has been made for the Village Clusters and until this is drawn up and considered against sites nearer employment and public transport, we call for these proposals to be dropped.	Need for climate change statement for village clusters?
Colin Dean on behalf of Governors of Coltishall Primary School	Object	Support the decision that the majority of sites in Coltishall and Horstead are assessed as unreasonable as significant concerns about capacity of school and traffic issues. Disappointed about plan for additional housing at Rectory Road. Concern about capacity at the school which is typically oversubscribed and traffic issues on Rectory Road. Do not support the reference that there is sufficient land to expand the school and would be strongly opposed to any expansion. There are no acceptable way to expand the school on a small scale and large scale development would be detrimental to the school ethos and environment and not in the interests of the children.	
Member of the public	Comment	Traffic through Horstead and Coltishall has significantly increased at all times of the day irrespective of season as a direct result of opening the Northern Distributor Road. Increase in development north of Norwich is madness without addressing capacity of two narrow road bridges at Hoveton/Wroxham and Coltishall/Horstead. Road infrastructure is poor due to age and constant use. Local residents are blighted with insensitive schemes, disruption and little or no investment in infrastructure or services. How many existing houses are empty? Current government policy is flawed with its rush to build, build, build leaving a shockingly poor legacy..	
GREAT AND LITTLE PLUMSTEAD			

Bidwells on behalf of client	Comment	<p>Appendix 5 of the draft GNLP lists Great and Little Plumstead among the Broadland village clusters with 'higher potential' to accommodate 50-60 dwellings reflecting the range of services and amenities available within the village cluster. Despite this no sites have been identified for growth in Great and Little Plumstead in the plan period to 2038. The rationale for this seems to be the presence of significant existing commitments in the cluster, however there does not appear to be any commentary as to whether these 129 dwellings are deliverable.</p> <p>It is considered that more sites should be allocated across the Broadland village clusters to give the GNLP greater resilience in securing a deliverable supply of housing land to 2038. Site GNLP0420R is ideally placed to provide this resilience by providing a small scale residential development.</p>	<p>Consider decision not to make any allocations at Great and Little Plumstead? Look again at Site GNLP0420R</p> <p>Consider the allocation of more sites across the Broadland Village Clusters to provide greater resilience</p>
HAINFORD CLUSTER			
Hainford Parish Council	Object	<p>Strongly object to proposed cluster of Hainford with Stratton Strawless or any other village and believe Hainford should retain its stand alone status. The reasons for linking Stratton Strawless to Hainford are weak. Object to proposal that there is potential for 50-60 dwellings. There are insufficient facilities and infrastructure to support this. Officers have already stated there is no capacity for Hainford school to expand and all 9 sites have been discounted mainly due to no safe pedestrian access to the school as well as highway concerns, flooding issues and visual impact. Public transport is limited and development should avoid reliance on the private motor vehicle.</p>	
Member of the public	Object	<p>Agree with Hainford Parish Council response. Concerned that records of flood incidents have been clustered with Spixworth and Horsham St Faith, thus watering down flood statistics for Hainford and hiding problems.</p>	<p>Investigate claim about the recording of flood incidents</p>

Armstrong Rigg Planning on behalf of Westmere Homes	Comment	Our clients land (GNLP2162) in Hainford is considered to represent the most sustainable and appropriate location for development in the village. It is clear that any growth in the village is considered to be constrained by poor pedestrian access to the primary school. Our proposals now include a significantly enhanced pedestrian route from the site and wider village to the school. This upgrade in connectivity represents a clear sustainability benefit that would help the village realise its potential to accommodate the 40-60 dwellings identified for the cluster.	Talk to highways about new evidence submitted regarding pedestrian access from the site to the school
HORSFORD CLUSTER (INCLUDING FELTHORPE COMMENTS)			
MDPC Town Planning	Comment	<p>Question why Horsford is not identified as a key service centre despite having a greater population than all other KSC's save for Hethersett and Poringland and is the 9th largest settlement in the overall area,</p> <p>Failure to recognise Horsford as a Key Service Centre (or removing the service village category) and treating as a village cluster means the GNLP approach to sustainability appraisal and site selection is flawed. The capacity of Horsford for growth is artificially reduced by a policy construct thus discriminating against its potential for growth and hampering the overall strategic objective of housing delivery. The removal of the service centre definition and introduction of village cluster concept was not even mentioned in the GNLP Growth Options paper January 2018.</p>	Consider revisiting Horsfords position in the hierarchy?
CODE Development Planners Ltd	Comment	Notwithstanding the support for the general approach and settlement hierarchy, (Policy 1) the distribution of new allocations with 1,400 at Taverham and none at Hellesdon or directly adjacent to the built edge in the adjacent parish of Horsford is objected to.	Consider revisiting Horsfords position in the hierarchy?

Savills on behalf of Barratt David Wilson Homes	Object	<p>Response reiterates comments made to question 13 e.g.:</p> <p>Overall the proposed distribution of growth including the focus on the area around Norwich is considered to be the most appropriate strategy and is supported.</p> <p>However the limited amount of growth assigned to Horsford is not supported. Despite being a village cluster it is the 9th most populous settlement across the 3 Districts and recognised as being a sustainable location for additional residential development. Further growth should be providing to recognise and reflect the recent growth of Horsford and to yet further improve the sustainability of the village.</p>	Consider revisiting Horsfords position in the hierarchy?
Jon Jennings on behalf of Richard Thrower	Support	<p>Sites in Felthorpe rejected due to poor access to core services and facilities in Horsford and no safe walking route to Horsford Primary School but it must be recognised that Felthorpe has a good range of facilities in its own right including a pub, village hall and bus service to Norwich and Holt.</p> <p>New site proposed for consideration at Mill Lane. Site would help towards meeting the 10% of housing requirement on sites no larger than 1 hectare. Site is previously developed in the form of a redundant builders yard and its re development would result in improvements to the character and appearance of the area.</p> <p>The site to the south is occupied by a disused timber yard which could be developed as an extension to this site, alternatively it could be brought back into commercial use.</p>	New site to be assessed
Felthorpe Parish Council	Support	Felthorpe Parish Council supports the conclusion that there are no sites within the parish that are suitable for development due to the lack of facilities within the village.	

HORSHAM ST FAITH CLUSTER			
Jon Jennings on behalf of Bright Futures Developments St Faiths Ltd	Support	Representations also made under Site GNLP1054. Client is seeking a smaller site to be considered to help towards the requirement for 10% of housing requirement to be on sites on larger than 1 hectare.	Revised site boundary to be assessed
Georgina Brotherton on behalf of clients	Object	<p>Do not support the approach to village clusters as drafted within Policy 7.4. Request that the policy is amended to include the existing employment allocation (ref HNF3) land west of Abbey Farm Commercial Park within the policy. Also the text should be amended to allow for the expansion of small and medium sized employment sites.</p> <p>The penultimate paragraph of Policy 7.4 should be amended as follows:</p> <ul style="list-style-type: none"> • <i>Other small-scale employment development will be acceptable in principle elsewhere within village development boundaries or through the re-use of rural buildings or through the potential expansion of existing small and medium sized employment sites (LPP suggested text) subject to meeting other policies in the development plan.</i> 	Consider amending Policy 7.4 as suggested
Brown & Co	Support	Overall strategy for village clusters is supported. New sites promoted in Horsham St Faith on land east and west of Old Norwich Road. The sites offer a good opportunity, with minimal constraints/impact on the character of the village	New sites to be assessed
Bidwells	Support	Strongly support the identification of Horsham St Faith and Newton St Faith as a village cluster in the GNLP. The cluster benefits from a range of services and facilities and is in close proximity to Norwich and the Broadland Northway. It can also help to support the GNLP's aspirations of providing a variety of housing types and tenures	
MARSHAM CLUSTER			

Carter Jonas LLP on behalf of Noble Foods Ltd – Farms	Object	<p>Object to preferred allocation GNLP2143 at Marsham and suggest that land at Fengate Farm (GNLP3035) should be allocated instead. The allocation of a greenfield site in preference to a vacant site containing buildings and areas of hardstanding is inconsistent with national guidance to promote the effective use of land (para 117 NPPF).</p> <p>If redevelopment of Fengate Farm is not supported then the landowners will need to consider intensive agriculture or commercial redevelopment, which would be out of keeping with nearby housing or the site would represent planning blight.</p>	Reassess site GNLP3035 in the light of consultation comments
REEDHAM CLUSTER			
Reedham Parish Council	Object	<p>Reedham is village cluster on its own and therefore cannot share its housing allocation with other villages. The proposed housing allocation in Reedham is based entirely on under capacity of schools with no consideration of other services or roads. Neither preferred site has safe access to the school or other services/facilities and therefore should be deemed ‘unreasonable’.</p> <p>Why are ‘village clusters in Broadland and South Norfolk not being consulted on at the same time?’</p>	
Members of the public - various	Object/ Comment	<p>Comments include:</p> <ul style="list-style-type: none"> · Reedham should not be included under this heading as it is not clustered · Isolated village, not well connected · No local employment · Significant number of holiday homes. Tourism is important · Limited public transport. Runs infrequently and at unsuitable times. · Further housing will necessitate car use on already congested routes · New housing unlikely to attract working people with young families · Further development is a flawed concept which seems to be based on the fact that the underperforming and cramped school has capacity · Information from head teacher shows that the number of pupils currently on roll is higher than the number the GNLP have based their assessment on · Sewers are not adequate 	

		<ul style="list-style-type: none"> · Doctors surgery cannot cope · Post Office only opens three half days a week · Village school is not big enough · No safe and accessible footways available to local services · More housebuilding will contribute to increased light pollution, carbon emissions and wildlife · Large parts of Reedham at risk of flooding questioning the viability and suitability of additional large developments. Surprised the Lead Local Flood Authority has entered a response of 'No comments' · Entire principle of village clusters is flawed when the Climate Change statement is taken into account. The JCS approach was more sustainable · No sites should be allocated until the emerging Neighbourhood Plan has been adopted · One of the proposed sites has no vehicular access and would be better used as a school playing field 	
SALHOUSE			
Salhouse Parish Council	Comment	<p>Salhouse has been proposed as a cluster with Woodbastwick and Ranworth which would be support however the Parish Council would like to ask what support will be given to this cluster. Any housing within this cluster should be pro rata over the three clusters and not all proposed/built within one village. It is unfair for Salhouse to accommodate all the additional housing needs.</p> <p>It is stated that the Parish Council has objected to all the proposed sites. This is true but not all the site were put forward at the same time so comments were made at differing times. A more considered approach was taken rather than just a simple yes/no option. The objection to GNLP0188 should be put in context that at the time the Parish Council was expressing a preference between this and an alternative site, which was subsequently chosen and developed.</p>	
OTHER CLUSTERS			

Halvergate Parish Council	Comment	Halvergate No issue with linking Halvergate and neighbouring villages as a cluster. Any planning permission granted should provide dwellings for the existing community. Concern that village cluster approach could mean larger developments permitted in villages with little or no infrastructure. Concern about strain on sewage treatment plant that serves Halvergate and Freethorpe.	
Lanpro Services Ltd on behalf of Glavenhill Limited	Comment	Upper Stoke Question over Stoke Holy Cross position in the settlement hierarchy. GNLP consider well related parts of the parish with Poringland whereas SNC state that Stoke Holy Cross will form a cluster in its plan. Object to no site allocations in Poringland KSC. Consider Stoke Holy Cross and related part of the parish, including Upper Stoke to be an appropriate location for small scale residential growth. Revised boundary proposal submitted for GNLP0494R	Revised site boundary to be assessed
COMMENTS ON SMALL SITES/SETTLEMENT BOUNDARY PROPOSALS			
Member of the public	Comment	Small site GNLP0450 in Moulton St Mary, south of Acle No mobile phone or wi-fi signal in the village	
Members of the public – various	Object	Small site GNLP0104 – Diss/Roydon Comments include: <ul style="list-style-type: none"> · Access to site through small, quiet cul-de-sac · Roads are narrow and not ideal for two way passing traffic or emergency vehicles/refuse collection · Traffic would pass over right of way at the entrance to the site used by many people including school children and dog walkers · Exit from the site via the A1066 is already congested with poor visibility · The entrance to the site is very close to existing properties · Area of archaeological interest · Increase in air pollution, potential flooding and wildlife impact 	

		<ul style="list-style-type: none"> Concern about closing the gap between Roydon and Diss and strain on services and facilities 	
Member of the public (Robert Gower)	Comment	<p>Great and Little Plumstead (Thorpe End) – GNLPSL3006</p> <p>Reps previously submitted to support a settlement boundary at Thorpe End, within the Great and Little Plumstead village cluster. It is understood that the re-appraisal of settlement boundaries is yet to take place however it is noted that a settlement boundary is identified on the interactive map therefore the principle of a settlement boundary for Thorpe End is supported.</p> <p>The draft settlement boundary should be adjusted to include a 14m strip of land to the south east of Thorpe End, south of Plumstead Road to reflect the true physical boundary which has come about due to changes in land use from agriculture to residential curtilage , this would enable the inclusion of a potential windfall housing plot. The impact of the site would be minimal on the Policy GT2 landscape buffer designation, which has already been altered by the use of the land as residential curtilage and construction of the NDR.</p>	
Member of the public	Comment	<p>Small site GNLP2175 in Reedham</p> <p>The sewage system cannot deal with any more dwellings on this road and the new dwellings on GNLP2175 would be upstream of this problem just making it a lot worse. Anglian Water say the sewer was not designed for all the extra houses that have gone up over the last 20 years or so. Anglian Water have told GNLP team that there isn't a problem so don't feel you are getting accurate information.</p>	
Member of the public	Comment	<p>Strumpshaw</p> <p>The existing settlement boundary map does not appear to include the end part of my garden. Would you please amend your details.</p>	

Smallfish on behalf of Anthony Jacobs	Comment	<p>Note the decision not to allocate any sites smaller than 0.5ha, dealing with these as boundary extensions rather than allocations, do not feel this reflects para 68 of the NPPF which seeks to allocate at least 10% of housing requirement on small and medium sites under 1 ha. Rather it ensures that only medium and large sites between 0.5+ha are allocated.</p> <p>Allocating sites of 12 or more with a min. target density of 25dph and at least 0.5ha will ensure that allocated sites will only deliver major development. It limits the overall mix of sites and means that small sites are only likely to be acceptable if they are immediately adjacent to the existing development boundary.</p> <p>This means that all small sites and minor residential developments are excluded from the allocation process despite the fact the smaller sites support smaller builders and build out more quickly helping to ensure a consistent and adequate housing supply is maintained. Specific reference made to GNL2151, a brownfield site in Reedham. Smaller sites such as GNL2151 and 2175 would be more appropriate to allocate than the larger preferred sites (GNL1001 and 3003) to retain village character.</p>	
SOUTH NORFOLK VILLAGE CLUSTER COMMENTS			
CPRE Norfolk Hempnall Parish Council Mulbarton Parish Council Saxlingham Nethergate Parish Council	Object	Concern that all of the “village clusters” in South Norfolk will not be scrutinised to the same degree as those in Broadland due to the separate South Norfolk Village Clusters Housing Site Allocations document.	

Salhouse Parish Council			
Saving Swainsthorpe Campaign	Object	A separate plan by SNDC is deeply suspicious and may be rushed and unrelated to other element of the GNLP and subject to little scrutiny once produced. The different target terminology between South Norfolk and Broadland is worrying.	Different approach used to South Norfolk and Broadland village clusters housing requirement.
Member of the public	Object	Concern at decision for South Norfolk to go it alone. Worry that they want to allow unfettered development, creating more of the same cramped in houses with minute gardens and insufficient parking. No mention of passive houses or creative self-building.	No mention of passive houses or creative self-building in the Plan?
Barton Willmore on behalf of KCS Developments	Object	Spooner Row Promoting five sites within Spooner Row which can deliver between 173 and 246 dwellings along with community facilities. Spooner Row is proposed to fall within the lowest tier of the settlement hierarchy within the GNLP – the “village clusters” – despite previously being identified as a service village within the Core Strategy. These representations demonstrate that this approach is flawed and underplays the significance of settlements such as Spooner Row.	
Member of the public	Comment	Woodton	

		Woodton cannot take any more housing. The school is at capacity, nearby schools are also full. The village relies on infrastructure of Poringland/Framingham Earl which is bursting. Additionally many of the proposed sites will exacerbate flood risk, leaving home owners to pick up the pieces down the line.	
Lanpro Services Ltd on behalf of Glavenhill	Comment	Mulbarton Comments relating to land north of Mulbarton offering general support to the concept of village clusters and confirming the availability, suitability and deliverability of site GNLP0496 for development.	
Lanpro Services Ltd on behalf of Glavenhill Ltd	Comment	Tacolneston Comments relating to land west of Norwich Road Tacolneston offering general support to the concept of village clusters and confirming the availability, suitability and deliverability of site GNLP1057 for development.	
Lanpro Services Ltd on behalf of Glavenhill Limited	Comment	Morley Support the designation of Morley as part of a village cluster and continue to promote Land West of Golf Links Road, Morley St Botolph (GNLP0356) as a suitable, available and deliverable site for a small-scale housing scheme.	
Bergh Apton Parish Council	Comment	Bergh Apton Comments regarding Bergh Apton being clustered with Alpington and Yelverton. Nearest school in Alpington with no footpath from Bergh Apton. Of the 9 sites put forward in Bergh Apton only the former blockworks on Church Road would have reasonable access to the school in Alpington with highway and footway improvements.	
Jayne Cashmore on behalf of Mrs S Bygate	Comment	Hethersett/Little Melton Site GNLP0454 should be Considered for allocation as it lies in close proximity to the Key Service Centre of Hethersett which is earmarked for significant housing growth. This is a brownfield site and should be prioritised over greenfield development. The site was submitted in 2016 but does not appear to have been covered in the Hethersett Assessment Booklet.	Should site GNLP0454 be considered in GNLP or South Norfolk Village Clusters Plan?

East Suffolk Council	Comment	<p>Any housing development in villages close to the former Waveney area is highly likely to impact services and facilities in Beccles and Bungay and traffic on the A146, an important link between Lowestoft and Norwich. Junction on the A146 near Beccles will be close to capacity by the end of the Waveney Local Plan period in 2036.</p> <p>The future allocation of 1,200 new dwellings in village clusters in a South Norfolk Village Clusters Housing Allocations Document should take into consideration the impact on services and facilities in East Suffolk and the overall combined impact of proposed development in South Norfolk and the former Waveney areas on the A146. The Council would wish to be notified of progress on the South Norfolk Village Clusters Housing Allocations Document.</p> <p>Support for the overall support of allocating housing growth in villages to promote social sustainability.</p>	
GENERAL COMMENTS			
Suffolk County Council	Comment	<p>Suffolk County Council would appreciate information on how Suffolk's education infrastructure may be affected by increased pupil demand arising from any new development, in terms of existing provision, catchment schools and associated mitigation in order to proactively promote synergy for schools cross boundary. The impact of growth in Harleston and Diss on nearby wards of Fressingfield and Palgrave needs to be considered. Growth is unlikely to be able to be accommodated and alleviated by Suffolk provision.</p>	<p>NCC Children's Services to liaise with Suffolk County Council re: cross boundary education provision</p>

Hopkins Homes Limited	Comment	<p>Whilst Hopkins Homes support the identification of village clusters to accommodate additional residential development to support the sustainable growth of rural areas, there should be no defined numerical restraint upon the size of site area or the number of dwellings proposed for allocation in this way. Instead, any such allocations should be made so as to be proportionate to the size of settlement cluster within which they are located and the range of facilities available, in order that they successfully meet local housing needs.</p>	
Pegasus Group on behalf of Pigeon Investment Management Ltd (submitted multiple times representing different sites)	Comment	<p>The GNLP proposes a disproportionately high level of growth in village clusters, a significant proportion of which are on as yet unknown sites to be identified in the South Norfolk Village Clusters Plan.</p> <p>Village clusters are by definition less sustainable locations for growth and development should be restricted to that necessary to support rural or local needs, however more growth is directed to village clusters than key services which have a relatively good range of services and facilities. The needs of rural areas would be more sustainably provided through development at Key Service Centres and Main Towns contrary to the GNLP strategy.</p> <p>Reliance upon a specific contribution from unknown sites in South Norfolk may require unsustainable sites to be brought forward rather than identifying more sustainable sites now. The absence of specific sites being identified will also adversely affect the housing land supply position and provide a lack of certainty going forward.</p>	

QUESTION 47

STRATEGY QUESTION:	Question 47: Small scale windfall housing development
TOTAL NUMBER OF REPRESENTATIONS:	32
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	5 Support, 7 Object, 20 Comments

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
Mr Ian Neave [18973]	Support	Support Policy 7.5 notably the development of a maximum of 3 dwellings within each Parish that will allow infill sites within a recognisable group of dwellings. Self-build is well aligned with this new policy and demonstrates a sensible relationship is being developed within the new proposals. Passivhaus should be considered with these types of developments as a sustainable option in view of current environmental concerns	Passivhaus should be considered.
Dr Murray Gray [14544]	Object	<p>Concerned about this policy, particularly allowing up to 3 dwellings on infill sites within a recognisable group of dwellings. My concerns are as follows:</p> <ol style="list-style-type: none"> 1. not clear whether the 3 dwellings are on a single site or can be single houses on 3 separate plots. 2. very unclear why this policy is being introduced and it appears to be contrary to other policies in the plan intended to: <ul style="list-style-type: none"> • ensure safe, convenient and sustainable access to on-site and local services and facilities including schools, health care, shops, leisure/community/faith facilities and libraries (Policy 2 Sustainable Communities) • reduce the need to travel, particularly by private car; 	<p>Clarity.</p> <p>Unsustainable development contrary to international, national and local policies trying to reduce the need to travel by private car</p>

	<ul style="list-style-type: none"> • secure the highest possible share of trips made by sustainable travel; • ensure that new housing will be close to every-day services and jobs; • locate growth in villages where there is good access to services to support their retention (Para 140 - Climate Change Statement). <p>The NPPF requires planning to support the transition to a low carbon future and new development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design.</p> <p>3. many planning applications have been refused by South Norfolk Council on infill sites outside development boundaries. Reasons often include remoteness from services and facilities, over-reliance on the private car, will not minimise greenhouse gas emissions and not located to use resources efficiently. As such, such sites are contrary to Policy 1 of the JCS and Policy DM3.10 of the SNLP Development Management Policy Document 2015. To introduce Policy 7.5 indicates that the Councils are disagreeing with these recent refusals at a time when the issues of greenhouse gas emissions and climate change are being taken much more seriously. This makes no sense. It is now generally recognised that we are dealing with a climate emergency and the government has a target of going to zero carbon by 2050. During the lifetime of the plan up to 2038, concerns over global warming are only likely to increase, and this policy will run counter to this trend. Although the government is banning the sale of petrol and diesel cars from 2035, older ones will still be being driven many years beyond the lifetime of the plan.</p> <p>4. With over 175 parishes in South Norfolk and Broadland, the number of houses that could be constructed under Policy 7.5 exceeds 500 and will simply consolidate hamlets that have no or few services and are therefore in unsustainable locations. Furthermore, in the towns and larger villages, the edge of development boundaries are far from services in the town/village centres and still predominantly involve the use of the private car.</p> <p>5. How will Policy 7.5 be monitored over the lifetime of the plan. For example, if an application comes forward in 2035 for an infill house in a hamlet, will anyone remember</p>	
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		<p>that 3 were given permission, say, 10 years earlier? And even if they do, will this carry much weight with the 2035 planning committee?</p> <p>6. This raises the issue of precedent, and whether Members will be prepared to refuse infill dwellings in any hamlet in future. There is therefore a real prospect of the consolidation of hundreds of unsustainable hamlets within the lifetime of the plan.</p> <p>7. The policy should also refer to the historic heritage (Conservation Areas and Listed Buildings), flood risk areas, etc.</p>	
CPRE Norfolk (Mr Michael Rayner, Planning Campaigns Consultant) [14427]	Comment	CPRE Norfolk feels that windfall development should be restricted to sites within settlement boundaries. Housing need is already catered for by other policies in the Plan. Windfall developments should also count towards overall housing targets.	<p>No development outside boundaries.</p> <p>Windfall should count against targets.</p>
Hempnall Parish Council (Mr I J Nelson, Clerk) [13769]	Comment	Hempnall Parish council considers that windfall development should be restricted to sites within settlement development boundaries. Housing need is already catered for by other policies in the Plan. Windfall developments should also count towards overall housing targets.	<p>No development outside boundaries.</p> <p>Windfall should count against targets.</p>
Bunwell Parish Council (Mrs Margaret Ridgwell, Parish Clerk) [19370]	Comment	This broad brush approach is not appropriate for small villages. Given the plan is up to 2038, a maximum of 3 houses is modest and generally insufficient. For example small businesses such as the local shop are dependent upon village trade, and with perpetually increasing costs, businesses need growth not stagnation. Also, too many times we hear families saying their children can't afford a house in the village given cost and poor availability. The current process of call for sites does work, thereafter examining what is required including sensible debate between the District Council and the Parish Council.	Higher levels of growth are needed in villages.
Honingham Parish Council (Ms Jordana Wheeler, Clerk) [14400]	Support	Honingham Parish Council support the policy of small scale housing development where this is no more than 3 houses. The Council particularly support infill housing where the houses built are sympathetic to the rural nature of the village. This size of development is sustainable and would support the community without putting undue pressure on local	

		services which are already struggling, and which residents already have to travel outside of the parish to use. There are no services in the village to sustain growth any larger than 3 houses.	
Saving Swainsthorpe Campaign (Robin Parkinson) [19447]	Object	'Windfall' housing development is a slippery concept and to avoid some of the pitfalls of 'definitional slippage' should be only permitted within existing settlement boundaries. Such development should form part of the delivery of overall housing targets and not provide additional and potentially unlimited development.	No development outside boundaries. Windfall should count against targets.
Mrs S Bygate [19513]	Comment	The text says the purpose of this policy is to allow for a limited number of additional dwellings in each parish beyond those allocated or allowed for as larger scale windfall sites through other policies in this plan. There is a risk that without alterations to draft policy wording (as suggested elsewhere within my submitted comments in relation to various questions), unallocated brownfield sites could fall between the thresholds set out in Policies 1, 7.4 and 7.5, and such sites could provide a more sustainable approach to housing delivery.	Concern larger brownfield sites could fall outside this and other policies.
Robert Gower [19504]	Support	The Policy 7.5 approach to enable small scale windfall housing developments beyond those allocated or allowed for as larger scale windfall sites is supported, however, the wording of the policy is not consistent with the supporting text or Policy 1. The wording of Policy 7.5 should clarify that a maximum of 3 dwellings per site is permitted, not a total of 3 dwellings per Parish. A limit of 3 dwellings per Parish is an arbitrary restriction, which would be unrelated to the scale and sustainability of the Parish	Limit to 3 dwellings is arbitrary
Reedham Parish Council (Mrs Claudia Dickson, Clerk) [12966]	Comment	Windfall development should be restricted to sites within settlement boundaries. Windfall developments should also count towards overall housing targets. Housing need is already catered for by other policies in the Plan.	No development outside boundaries. Windfall should count against targets.
Lanpro Services [19515]	Comment	Policy needs to ensure small scale windfall in village clusters is small scale through identification of appropriate development boundaries, as these settlements are not the most sustainable in the hierarchy. The requirement that the cumulative amount of windfall development permitted during the plan period should not have a negative impact on the	Need for appropriate development boundaries and should

		character and scale of settlements in any village cluster in Broadland should help to achieve this. However, why does this statement not refer to South Norfolk village clusters also? Or is a separate policy going to cover these?"	apply throughout the plan area
Glavenhill Ltd [19516]	Comment	Policy needs to ensure small scale windfall in village clusters is small scale through identification of appropriate development boundaries, as these settlements are not the most sustainable in the hierarchy. The requirement that the cumulative amount of windfall development permitted during the plan period should not have a negative impact on the character and scale of settlements in any village cluster in Broadland should help to achieve this. However, why does this statement not refer to South Norfolk village clusters also? Or is a separate policy going to cover these?"	Need for appropriate development boundaries and should apply throughout the plan area
Hempnall Parish Council (Mr I J Nelson, Clerk) [13769]	Object	Hempnall Parish council considers that windfall development should be restricted to sites within settlement development boundaries. Housing need is already catered for by other policies in the Plan. Windfall developments should also count towards overall housing targets.	No development outside boundaries. Windfall should count against targets.
Mr Phil Gledhill [12749]	Comment	Individual village housing requirements whether with or without a primary school should be judged inclusively, with housing numbers, type and site/s identified to satisfy that village's needs and best interests. A windfall of 3 houses in total for a cluster site with no primary school over the GNLP period of 12 years is grossly inadequate for most villages and particularly if any local services there are to survive. They need sensible growth. It is ridiculous to treat so many villages with a broad brush housing policy based upon the same maximum number of 3 per village.	Insufficient growth in villages without schools and limit is too broad brush
Hingham Parish Council (Mrs A Doe, Clerk) [12974]	Object	The policy, it is not clearly written and is ambiguous and needs to be clarified or removed completely. Potential for a considerable number of houses throughout the district and would add additional burdens on the communities and infrastructure/facilities, have additional negative impact on climate change and place more residents in areas where there is a lack of public transports etc.	Potential for cumulative impact across a range of issues

		Policy will mean applications for development will seemingly be approved even if there is local opposition and developments may be built outside of a development boundary or infill into small valuable areas of open countryside.	
Aylsham TC (Mrs Susan Lake, Town Clerk) [19559]	Comment	<p>Clarification for size of site would be useful as how the policy stands it might not meet the requirement in your vision for homes:</p> <p>Homes To enable delivery of high-quality homes of the right density, size, mix and tenure to meet people's needs throughout their lives and to make efficient use of land.</p> <p>Also what measures are there in place to prevent repeated applications for three houses from small developers on basically the same site?</p>	Size of site clarified to ensure vision is met
Mrs Margaret Mckernon [18872]	Comment	<p>I am grateful that small windfall development and review of settlement boundaries has been included.</p> <p>Promised consultation on revised development boundaries has not occurred. Is 7.5 above a deviation from this opportunity to review archaic settlement boundaries? If not this would advantage large scale development while not including appropriate applications for boundary changes for small scale developments within the consultation as was previously stated. The number of 3 over such a lengthy period appears restricted compared to the numbers within new developments. The process by which this allocation is made is not specified and left open ended.</p>	Concern that review of development boundaries has not happened. Limit to 3 dwellings is too restrictive
Malcolm Turner [14635]	Support	Most of us will be aware of unused/ wasting land assets on the fringe of housing clusters that could be put to better more sustainable use. They mostly are already capable to linking up to the existing services. Such sites do not change the character of the area and are often seamlessly absorbed into the landscape. The National Planning Framework Document calls for a small percentage of new development sites to be of 5 units and below but all too often they are not approved. There is too much emphasis on larger estates and ignoring small scale windfall opportunities.	

Brown & Co (Mr Paul Clarke, Associate Partner) [12840]	Comment	We consider that the approach for small scale windfall housing development is too restrictive in terms of the levels of development that would be considered acceptable.	Too restrictive
Ms Carol Sharp [14169]	Comment	Appropriate sites for development have been allocated within settlement boundaries and it is not necessary to raise the buffer, small scale windfall should be seen as contributing to the overall need identified in the plan rather than in addition.	No development outside boundaries. Windfall should count against targets.
Mulbarton Parish Council (Miss A Phillips, Clerk) [13463]	Comment	MPC believes that windfall sites should be restricted to within settlement boundaries and should also count towards the overall housing targets.	No development outside boundaries. Windfall should count against targets.
East Suffolk Council (Ruth Bishop, Senior Planning Policy and Delivery Officer) [19611]	Support	We support the approach in the Small Scale Windfall Housing Development policy	
Cornerstone Planning Ltd (Mr Alan Presslee, Director) [13498]	Comment	Support save for the proposed maximum of 3 dwellings. The objective is laudable but the limit could prove counter-productive and see a rush to take up the modest 'allocation' early in the Plan period and thereby leave otherwise acceptable and useful (to housing land supply) development being refused or having to wait until the next Plan period. We recommend that the limit of three dwellings either be raised considerably (although this should properly reflect the size/character of the individual Parish or village/s), or that it is removed altogether, relying on other Development Management policies to determine the suitability/ acceptability of a site and its development."	Limit should be raised or removed

Mrs Nicole Wright [14312]	Comment	<p>We support this policy with the proposed slight modifications:</p> <ul style="list-style-type: none"> i. The word minimum is changed to maximum; and ii. The policy includes compliance to a list of criteria requiring outstanding or innovative designs which promote high levels of sustainability, or help to raise the standard of design more generally in rural areas, so long as they fit in with the overall form and layout of their surroundings. For example, low carbon developments incorporating renewable energy generation. (Paragraph 131 of the NPPF 2019) <p>Justification</p> <p>Rural areas can sometimes be seen as less sustainable locations for housing. However, it is important maintain the vitality in these areas. Delivery in these locations can offer an opportunity to showcase new innovative designs and reduce carbon emissions though electric vehicle charging etc. in locations less accessible by public transport and other alternative modes."</p>	Should allow for more development and to higher standards
Gladman Developments (Mr Craig Barnes, Planning Manager) [19643]	Comment	<p>Policy should refer to any sustainable settlement with reference to ~small scale" removed allowing for greater flexibility for windfall provision. The Plan should establish a positive framework for windfall development to come forward at suitable and sustainable locations adjoined to its named settlements. Gladman recommends that the Council adopt the approach of Ashford Local Plan Policy HOU5 which applies a criterion-based approach towards windfall proposals enabling an uplift in housing land supply. This is controlled to ensure that the overall spatial strategy is not undermined or prejudiced, and a sustainable pattern of development is secured.</p>	More flexible approach required to windfall outside development boundaries
Gladman Developments (Mr Craig Barnes, Planning Manager) [19643]	Comment	<p>Gladman support the policy of allowing windfall development in principle. However, Gladman object to the "small scale" wording, which should be changed to "appropriate scale" and should apply not only to "Village Clusters" but also "Key Service Centres". A flexible windfall policy should be introduced for development adjacent to existing settlement boundaries of an appropriate scale to the settlement. This could work to accommodate existing housing need and future needs of settlements, in sustainable</p>	More flexible approach required to windfall outside development boundaries

(Comments in relation to land holdings at Poringland)		locations that would provide benefits to the local community and could contribute to the supply of housing for the District.	
Crown Point Estate [19671]	Object	<p>Windfall sites are an important element of overall housing provision, and are often able to be provided quickly and by a variety of providers. Policy 7.5 should omit the reference to 3 dwellings. The final sentence of the policy will ensure that development proposals respect the settlement hierarchy, the character and appearance of the area, and their relationship to site context and boundaries.</p> <p>Restricting windfall sites to 3 units means that the threshold for affordable housing will not be able to be met, whereas encouraging larger developments within the parameters suggested above would yield genuine benefits to the communities that such sites are associated with."</p>	<p>More flexible approach required to windfall outside development boundaries.</p> <p>Policy will not provide for affordable housing</p>
Barratt David Wilson Homes [15660]	Comment	<p>Policy should relate to self-build plots only, with no cap on numbers, and should be the primary approach to the delivery of self-build plots in order to meet the statutory requirement to promote self-build. This approach should be used rather than seeking a percentage of self-build plots on sites of 40 dwellings or more, which are often less desirable locations for self-builders to live, as required by Policy 5.</p> <p>The removal of a cap on the number of homes that could be delivered in each parish would ultimately allow for more self-build homes to come forward as windfall sites. If the only homes that were permitted were to accommodate the needs of people on the Councils' self-build registers this would mean that the new homes were occupied by people with ties to the area. This is also likely to mean that these new homes would be more acceptable to local communities.</p> <p>Prioritising the delivery of self-build plots on the edges of development boundaries is more sound than relying on major development sites to deliver self-build plots. Especially as the cost of delivering infrastructure to serve these larger sites often impacts negatively on the</p>	Limit to self build (and remove self build requirement on larger development)

		<p>percentage of affordable housing that is delivered. A requirement for self-build plots on developments of 40 dwellings or more, which generate less revenue for developers than finished homes, has the potential to further reduce the percentage of affordable housing on these large sites.</p> <p>By permitting the development of small sites on the edges of development boundaries to accommodate self-build plots it would help to boost the supply of housing, address the Councils' self-build registers and provide a continued source of employment for small builders and tradespeople. It would also remove the obligation from larger development sites in order to maximise the amount of affordable housing that they could viably deliver."</p>	
Salhouse Parish Council (Ms Sarah Martin, Clerk) [13648]	Comment	<p>CPRE Norfolk feels that windfall development should be restricted to sites within settlement boundaries. Housing need is already catered for by other policies in the Plan. Windfall developments should also count towards overall housing targets.</p>	<p>No development outside boundaries.</p> <p>Windfall should count against targets.</p>

QUESTION 48

STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:	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
TOTAL NUMBER OF REPRESENTATIONS:	79 (64 respondents)
SUPPORT/ OBJECT/ COMMENT BREAKDOWN:	0 Support, 18 Object, 61 Comment

RESPONDENT (OR GROUP OF RESPONDENTS)	SUPPORT/ OBJECT/ COMMENT	BRIEF SUMMARY OF COMMENTS	MAIN ISSUES REQUIRING INVESTIGATION
19866 Public	Object	<ul style="list-style-type: none"> • Only lip service given to environmental consequences of expansion • Natural areas are planned for development rather than agriculture • Road expansions will increase traffic + will increase climate issues • Lack of sustainability in plan needs addressing 	Note comments, particularly in relation to policy 3 on the environment
22547 Historic England	Object	<ul style="list-style-type: none"> • Glossary changes; • Add definition for listed building, Local List and Registered Park and Garden • Change Scheduled Ancient Monument to scheduled monument 	Amend glossary as suggested
23126 Client Earth	Comment	<ul style="list-style-type: none"> • Effective monitoring framework needed with specified yearly targets • Proposed indicators don't achieve this in a number of themes; climate change, renewable energy capacity, GI, Sustainable transport 	Consider amendments to the monitoring framework in relation to the comments.
22069 Norfolk Wildlife Trust	Comment	<ul style="list-style-type: none"> • Appendix 3 Monitoring • Indicators chosen for natural environment need changing; • GNLP18 & 19 are variables unrelated to the local plan and planning permissions – recommend these are reviewed. 	Consider amendments to the monitoring framework in relation to the comments.

		<ul style="list-style-type: none"> • GNLP20 is supported though it is incomplete – additional targets needed which record areas of nature conservation sites (as listed in Table 4 of the plan) and non-designated Priority Habitats including ancient woodland (as defined by NERC Act 2016) lost to development – as a plan objective is to protect and enhance natural environment, recommend target set at zero loss • Expected that mandatory biodiversity net gain requirement will be included in Environmental Bill - Recommend additional target to measure amount of net gain delivered as per DEFRA Biodiversity Metric – environmental bill to also include aspiration to create Nature Recovery Network which overlaps with need for development to provide biodiversity net gain 	
19930 Public	Object	<ul style="list-style-type: none"> • Dispersal of sites means losing the essence of Norfolk due to developments around villages. The scenery should be protected in the plans. • Lingwood & Brundall transformed into suburbs by development which is ruining rural Norfolk. • Profit seems to drive housing – there is a need for bungalows which is not being met. • New Costessey gained from bypass of the 80s but has been ruined by traffic increase from Longwater. Roads can't cope with these developments. • Seems we economise roads and aren't building them for the future, NDR is an example – roundabouts are problematic because insufficient funds would not allow for proper slip roads and fly overs. • More houses and cars will increase traffic and create congestion coming into Norwich on junctions – these are not fit for purpose currently • Removing lanes for bus lanes doesn't reduce car use. • Bike lanes also don't fix traffic issues and in Norwich they often don't have priority making it simpler to cycle on road. • To reduce traffic look into banning diesels in Norwich city centre. • Bus fares too expensive, cheaper to drive and park in the city 	Consider amending policies and text in relation to the concerns expressed.

19934 Public	Object	Excessive development through Norfolk is inappropriate when no account taken of health care demand issues.	Consider amending policy 4 on infrastructure and the supporting text and appendix on health care provision.
20078 Public	Comment	Having attended the helpful viability workshop on 14 Feb it would be useful to see the supporting evidence behind the assumptions i.e. conversion rates for ART and AHO sold at 60 and 75% of OMV respectively? BLV at £650K Urban and £200K service village, per acre ? The ongoing debate around the use of BCIS cost indices verses a QS cost plan needs to be agreed . (could a panel of regional QS firms be used?) Similarly, scheme GDV needs to reflect actual sale evidence. Presumably NPS can make their source material available?	Consider comments through additional work on the viability study
20278 Public	Object	No more house building	View noted but considered unrealistic given the national and local housing crisis.
20419 Public	Object	<ul style="list-style-type: none"> • New houses to be environmentally sustainable – solar panels, full insulation, grey water capture • All new housing should be social – no need for more private housing • Allocated houses should be built before new sites chosen • Figures used for housing are incorrect – out of date criteria used • New developments need infrastructure in place before being built, not after • Developers should not be allowed to reduce percentage of affordable homes • SN disingenuous in not showing their plans in this • Resolve public transport issues before developing in villages • Development should be near employment, not scattered across rural areas 	Consider amending policies and text in relation to the concerns.
20533 Public	Object	<ul style="list-style-type: none"> • No to western link, dualling A47 and building on Greenfield sites – would negatively impact climate crisis and ecosystem 	Consider amending policies and text in relation to the concerns expressed on the housing strategy and infrastructure.

<p>20558 + 20561 + 20767 Public</p>	<p>Object</p>	<ul style="list-style-type: none"> • GNLP flawed – political focus instead of dealing with pragmatic issues and flouts national policy on climate change. • Court of Appeal Heathrow decision puts GNLP in dubious position given higher levels of rural development which would increase carbon emissions – this is against national policy and lead to GNLP being challenged. • GNLP redundant as JCS only in effect since 2014 and covers until 2026 – change in rural development is startling and inappropriate • GNLP abandons Norwich focus (Which NDR was built for) for primary school places in village clusters. This ignores issues of climate change which undermines its own stated goals. • Uses old Household Projections data. 	<p>Consider amending policies and text in relation to the concerns expressed on the housing strategy and infrastructure.</p>
<p>20682 CPRE Norfolk + 20800 + 21506+ 21859 Hempnall PC + 22671 Saxlingham Nethergate PC + 23120 Salhouse PC</p>	<p>Object</p>	<ul style="list-style-type: none"> • Existing allocations likely to cover at least 18 years • Recognise government requires more allocations but a phased approach should be adopted for these. • Phasing not included as an option which is felt to be a serious omission – 68 Parish and Town Councils support CPRE Norfolk on this issue • ONS statistics out of date • 9% buffer on top of additional allocations is absurd. • Irrational that Windfall won't be counted towards targets • Support Concentration of development in and close to Norwich – will minimise landscape impact, air and light pollution and will maximise public transport use, would also protect biodiversity and GI and ensure good access to services, facilities and infrastructure. • NDR built to facilitate this aim. • If Norwich sites come forward (e.g. Carrow Works) hope these will reduce the allocations in rural areas. • Support settlement hierarchy in JCS – village clusters seems flawed • Concern over SN village allocations being separate and 'minimum' of 1200 houses 	<p>Consider the broad range of comments made. In particular, policy 1 will need to make use of research on JCS and GNLP policy approaches + housing delivery for the villages in considering the merits of the draft plan's approach to village clusters.</p>

	<ul style="list-style-type: none"> • Little economic evidence that housing on village edges will boost local services – inversely it is likely to place strain on services, particularly health and education. • Existing hierarchy protects rural areas from excessive development and should be retained. • Removal of green belt is unjustified – 2,211 signatures in support for it during Reg18 site proposals • Policy 3 could do more to protect and enhance natural environment – Nature Recovery Network by enhancing ecological network by river systems, and supported by environmental land management scheme. Include details plans and land management documents for landscape and wildlife including an AOB extension. • JCS has sufficient employment/economic allocations, these should be developed before any other allocations made. • Linking affordable housing targets to overall housing targets is potentially damaging as it becomes reliant on large housing targets meaning developers will make a case for higher targets • Ideally affordable & social housing should be a stand-alone provision where needed, disconnected from housing targets. Support rural exception sites to supply local needs for these. • Where affordable housing is expressed as percentage of housing on a site, essential Policy 5 requirements are met for sites of 10 or more houses. Hoped viability will become more transparent to make it more difficult to evade responsibilities for delivery of affordable homes. • Housing targets need to be kept low given water demands and scarcity of supply. More demanding PCC of water needed. • Commitment needed to build to highest environmental standard. • Promotion of NWL contradicts Policy 4 aim to promote modal shift in transport. 	
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		<ul style="list-style-type: none"> • Support protection of function of strategic transport routes and suggest no industrial development is permitted on unallocated sites along these corridors of movement. • Supporting Norwich Airport Growth is against climate statement in Section 4 • Public transport to be improved and made affordable in all areas, rural Norfolk in particular. • Meeting post-carbon goals will be challenged by dispersal of housing sites which will increase car use. • Villages rarely have enough services and facilities for growth • Question relevance of plan which is likely to be reviewed and replaced at least 3 times before its end-date • Concerned so many are unaware of JCS and GNLP and where public are engaged their input is ignored (e.g. phasing) 	
20693 John Long Planning	Comment	Otley Properties Ltd request that the CIL charging instalment policy is revised to provide more flexibility for small builders and developers. Otley Properties Ltd would be very happy to engage in discussions about the CIL to explain the issues small developers face.	Consider comments through additional work on the viability study
20859 Welbeck Strategic Land III LLP via Bidwells	Comment	Whilst there is general support for the approach adopted and the collaborative approach that the GNLP Team are seeking to adopt, there is concern that the assumptions made within the Viability Study in relation to, amongst other things, sales values, build costs and benchmark land values are too generic and not backed up by comparable evidence. Further evidence on this is provided below.	
20881 Hethersett PC	Comment	<ul style="list-style-type: none"> • Need to address sustainability issues of water use, transport and well-being as impacted by development to meet 2050 carbon neutral goal • Due consideration needed for well-being of residents – medical, physical and environmental • Infrastructure should support and enhance, not create friction and overcrowding 	Consider the broad range of comments made through policies 1, 2, 3 and 4.

		<ul style="list-style-type: none"> • Climate issues and housing missing from plan e.g. domestic energy features, reduction of PCC water rate and creation of lined green belt • SN village cluster plan should be available to public scrutiny • Concur with SNC identification of unreasonable to all Hethersett sites, also reject GNLP04804 to maintain Wymondham Hethersett gap. • Hethersett has its maximum allocation, not minimum of 1349 as mentioned in consulting document as a commitment. All within current plan of 2016 • Phased development should be used to increase market competitiveness • Use most recent ONS figures • Environmental protection to be intrinsic in plan • plan to include well-being of all and not allow for tokenism but listens and acts on consultations made 	
20894 Norfolk Constabulary via NPS Property Consultants Ltd	Comment	<ul style="list-style-type: none"> • Recognise importance of providing robust and fully justified evidence to support infrastructure requirements. • Work underway to prepare a Police Infrastructure Needs Strategy for Reg 19 version of GNLP & GNLPINR 	Note the production of the Police Infrastructure Needs Strategy to inform revisions to policy 4 and its appendix.
20983 Public	Object	<ul style="list-style-type: none"> • GNLP focus on growth at all costs without acknowledging implications • Mitigation is insult to what has been lost • 27% brownfield target means 73% loss to countryside already being seen. • Disconnect between developments and surroundings e.g. Hoveton to Cringleford • Unimaginative, unsustainable, undesirable, destructive 	Consider the comments made through policy 1.
20999 Public	Comment	<ul style="list-style-type: none"> • Keep village/small town identities – don't destroy with overdevelopment • Infrastructure needed prior to building • Bespoke cycle paths needed, not painted onto roads/pavements • Connect transport systems • Provide facilities for communities not rely on charities 	Consider the comments made through policy 1 on the overall strategy and policy 4 on infrastructure.

21134 FCC Environment Ltd via Joanna Berlyn	Object	<ul style="list-style-type: none"> • Considers HELAA supporting basis of Local plan fails to consider submitted sites accurately. • Discrepancies between HELAA and corresponding Site Assessment Booklets (As shown in comments on GNLP 2128) 	Note views on HELAA and Site Assessment booklets especially in relation to site GNLP2128
21194 Hopkins Homes, Persimmon Homes & Taylor Wimpey via Bidwells	Comment	<ul style="list-style-type: none"> • Interim Viability Study - concerns regarding lack of consideration of strategic-scale sites (i.e. 1000+ dwellings). • CIL Review - comments regarding viability must be accepted on the basis of the current regime, and the outcome of the CIL Review may have significant implications for viability. 	Consider comments through additional work on the viability study + CIL
21216 Kier Living Eastern Ltd via Bidwells	Comment	<ul style="list-style-type: none"> • Implications of CIL Review must be acknowledged. • We wish to re-confirm the deliverability of site GT13 (Norwich Rugby Club). Its allocation in the Growth Triangle Area Action Plan confirms that it is an entirely suitable and sustainable location for growth, and will deliver a significant quantum of the required housing growth. 	
21231 Saving Swainsthorpe Campaign	Comment	<ul style="list-style-type: none"> • Unclear why GNLP has significant target increased compared to JCS. • Broadland Northway supported on assumption it would enable housing expansion on fringes of Norwich and within growth area. • Allocations in Broadland and SN will use green land • No mention of phasing 	Consider the comments made through policy 1.
21281 Anglian Water Services Ltd	Comment	<ul style="list-style-type: none"> • Appendix 1 – references water recycling centres in GNLP area set out in Anglian Water’s Water Recycling Long Term Plan. • However no reference to required improvements to water supply and/or foul sewerage networks to accommodate additional development. 	Cover the issue through policy 4 on infrastructure. This will involve including additional findings from the Water Cycle Study and liaising with Anglian Water on the additional information required in appendix 1 on water supply and/or foul sewerage networks.
21354 Reedham PC	Comment	<ul style="list-style-type: none"> • Unclear why GNLP has different location focus for developments from JCS – NDR constructed to cater for Norwich fringe growth • Phased development needed 	Consider the comments made through policy 1.

		<ul style="list-style-type: none"> Increasing land availability does not mean more houses will be built 	
21546 Bergh Apton PC	Comment	<ul style="list-style-type: none"> Due to dispersal in SN transport is necessary so the 1,200 houses is contrary to climate change goals. Plan is to 2038, climate change will have greater effect by then 	Consider the comments made through policy 1 and the Climate Change Statement and policies.
21640 Public	Object	<ul style="list-style-type: none"> Object to governance of plan preparation; intention to consult in September 2018 which did not occur. In those documents we were notified an opportunity to submit change of boundary can be put forward during consultation. In current consultation document it is unclear how to present boundary amendments. No evidence in plan of strategy to mitigate against effect of this change of direction. 	Noted. Ensure an opportunity is provided to consider changes to settlement boundaries.
21751 Persimmon Homes (Anglia)	Comment	Will be submitting further evidence in response to Interim Viability Study in the near future	Noted in relation to Viability Study.
21782 RSPB East of England Regional Office	Comment	Appendix 1 mentions extending Strumpshaw waste management site, given its location near Strumpshaw Fen the RSPB request more details of scale and whether additional waste services will be provided	Noted. Pass comment on to NCC as Waste planners.
21783 Brown & Co	Comment	<ul style="list-style-type: none"> Raise concerns that significant risk of double counting where some development which are being delivered are being proposed as new allocations. No consistency between delivered, existing commitments and new allocations Some settlement booklets refer to no allocations carried forward while the table within strategy/ area action plan indicates there are Concerns of deliverability by virtue of previous non delivery, infrastructure constraints and viability. Concern over delivery to 5year housing land supply 	Consider the comments made through policy 1 and the Climate Change Statement and policies.

		<ul style="list-style-type: none"> • Object to strategy for growth as incompatible with climate goals, distribution will not help facilitate transition to post carbon economy • New Honingham Thorpe Settlement provides opportunity for growth with purpose-built infrastructure and energy efficient and climate smart technologies built in. 	
21837 Natural England	Comment	<ul style="list-style-type: none"> • Please refer to our comments made in relation to Appendix 1 under Policy 1 and Q17 above Policy 1 – Appendix 1 comments; • Welcome recognition new development must be supported by additional infrastructure of all kinds, Appendix 1 is disappointing given the complete absence of GI being mentioned. • Appendix is based on the findings of the undated Greater Norwich Local Plan Infrastructure Needs Report (GNLPINR) which makes limited reference to the provision of GI via a large scale map which shows strategic GI corridors and contains two sentences. • Strongly recommend that references to GI throughout the Plan should be made instead to the Greater Norwich Infrastructure Plan (dated July 2019). This document refers to GI in many sections, and in Appendix A – Infrastructure Frameworks includes a detailed list of the GI projects that will be delivered under the current Joint Core Strategy (JCS), and presumably rolled forward into the new Plan. Clearly, it will need to be updated due to the new development being proposed under this consultation. However, more detailed information about the quality and quantity of GI together with where on the ground it will be delivered needs to be included in the Plan. 	Note comments and liaise with Natural England on potential amendments to the policy, text and appendix coverage of green infrastructure. This work will need to be done in the context of the GNLP being a strategic level plan which is supported by an infrastructure plan.
21913 Coltishall PC	Object	<ul style="list-style-type: none"> • Numerous letters sent to Monitoring Officer at Broadlands DC demanding chair of GNDP Cllr Shaun Vincent steps down given his conflict of interest as a developer and having his own consultancy company advising on planning matters. 	Note objections on procedural issues which will be considered in the light of the Chair's declaration of interests at each GNDP and Broadland meeting.

		<ul style="list-style-type: none"> • S28&29 of Localism Act 2011 which implies Cllr Vincent should not be involved in selection process. • How is situation managed and does this not raise questions of why sites are preferred over others? 	
21919 Great Yarmouth Borough Council	Comment	<ul style="list-style-type: none"> • Welcome document, support GNLP team on reaching this stage. • Agree strategy is appropriate and complies with updated 2019 NPPF and conforms to Norfolk Strategic Planning Framework • Note references which relate to Great Yarmouth and suggest strategic links to GY are strengthened and importance of offshore energy sector related growth and tourism in GY are more explicit. Particularly with dualling of A47 which is supported by our local authorities through the A47 alliance. • No further comments at this time but reserve right to comment in future stages. 	Note general support. Consider amendments to the text and policies to provide further coverage of cross boundary issue relating to Great Yarmouth.
21952, 22914, 22946, 22966 + 23003 UEA Estates & Buildings via Bidwells	Comment	The Greater Norwich Local Plan, Interim Viability Study, prepared by NPS Group (November 2019), only covers mainstream residential development, and not UEA related academic development or purpose-built student accommodation. Notwithstanding this, the UEA are confident that the delivery of GNLP0133-B, GNLP0133-C, GNLP0133-D, GNLP0133-ER and GNLP0140-C are viable, having regards to the policy requirements of the draft GNLP, alongside no factors that UEA are aware of, at this moment in time, which could prevent delivery of these sites. However, given the duration of the plan period, it is important that there is sufficient flexibility within the plan to re-visit the viability of development projects/sites as they come forward and to reflect any changes in circumstances which could question the viability of fulfilling all policy requirements set out within the plan.	Consider comments through additional work on the viability study.
22007 SN Green Party	Comment	<ul style="list-style-type: none"> • JCS concentrated growth to Norwich which was supported by expensive infrastructure projects, particularly the NDR. • Changing policy now would be costly, particularly with dispersal to rural areas which have insufficient infrastructure, services and transport making 	Where relevant to strategic planning, consider the broad range of comments made through policy 1 on the strategy, 2 on sustainable

		<p>development unsustainable. It would lead to more congestion and pollutions creating difficulties in meeting carbon-reduction targets.</p> <ul style="list-style-type: none"> • Support inclusion for specific policy on air quality. • Like to see policy with target on space for community food growing within new developments. • Like to see councils commit to following to reduce carbon emissions & footprint; • Retrofit council owned properties with higher insulation and heat pumps where possible • Require buildings on council land to be extremely energy efficient, using Passivhaus standard or similar. • Require deliveries to council to be by electric vehicles/bike (e.g. through setting up distribution centre for onward deliveries by clean vehicles) • Ban single use plastics in council offices and premises • Adopt circular economy waste policies in relevant plans and contracts • Double tree cover on council owned land, update local planning strategies to double tree cover across LA area, ensure existing trees are properly protected in order to store carbon, support nature, improve soil and water quality and aid food protection and urban design. • Manage council owned land and road verges to increase biodiversity and drawdown carbon pollution, including through reduced pesticide use and increased planting of wildflowers. • Waste only briefly covered and targets to be set. Council should aim for zero waste to landfill or incineration. • Norwich reuses, recycles and composts 38% of its household waste compared to the best figure of 58% in similar LA's. SN reuses, recycles and composts 43% of its household waste compared to the best figure of 68% in similar LA's • We welcome the replacements and improvements to Recycling sites mentioned in the Appendix 	<p>communities, 3 on the environment and 4 on infrastructure.</p>
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		<ul style="list-style-type: none"> • Care accommodation was not fully covered in the document, this is crucial for the needs of an increasing aging population. • We agree with CPRE that current consultation processes are not reaching the majority of people although we appreciate roadshows were provided in many locations, perhaps a Citizens' Assembly approach would be a means which would enable more people to be involved. 	
22030 Mulbarton PC	Comment	<ul style="list-style-type: none"> • Mulbarton and SN have not benefited from any major infrastructure developments. • JCS concentrated housing around Norwich which was supported by expensive infrastructure like the NDR. • Build carried forward housing before allocating new sites 	Consider the comments made through policy 1 on the growth strategy and policy 4 on infrastructure.
22170 Norwich Liberal Democrats	Comment	<ul style="list-style-type: none"> • Housing distribution and transportation policies conflict with section 4 and reduction of emissions. • Disappointed draft plan is not more ambitious 	Consider the comments made through the policy 1 and the Climate Change Statement and policies.
22232 + 22234 Department for Education	Comment	<ul style="list-style-type: none"> • Overall housing target will place additional pressure on social infrastructure such as educational facilities. • Welcome reference to support development of appropriate social and community infrastructure established in Policy 1, 4 and supporting text in Paras 196-199, specifically with reference to the need for timely delivery. • Support safeguarding land for provision of new schools to meet objectives in NPPF. When new schools are developed LA's should seek to safeguard land for future expansion of schools where demand deems it to be possibly necessary. • Have regard to Joint Policy Statement setting out government's commitment to support the development of state-funded schools and their delivery through the planning system. • Encourage close working with LA's during all stages of planning policy development to guide development of new school infrastructure and meet predicted demand for school places. • Please add DfE to list of relevant organisations to engage with 	<p>Consider comments when considering policy 4 on infrastructure, particularly the view that applicable developments will provide land and funding for construction of new schools.</p> <p>Ensure that DfE is added to consultation database.</p>

	<ul style="list-style-type: none"> • Site allocations and associated safeguarding policies should clarify requirements for delivery of new schools – when to be delivered, minimum area required, preferred site characteristics and how to safeguard additional land for future expansion of schools as necessary • Viability assessment enables informed judgement about which developments would be able to deliver schools etc leading to fair, realistic and evidence-based policy requirements. Should be an initial assumption that applicable developments will provide land and funding for construction of new schools. Anticipated education need and cost of provision should be incorporated from outset. • Flexibility needed for site specific requirements for schools given need for school places can vary over time. Recommend next version of plan highlights; <ul style="list-style-type: none"> • requirements of development contributions to increasing capacity of schools/provision of new schools to be confirmed at application stage to ensure latest data on identified need informs delivery • requirement to deliver school could change if demonstrated and agreed that no longer needed. • DfE would like to be included as early as possible in further discussions on potential site allocations, as there are central wave pipeline free school projects in South Norfolk District which may be appropriate for specific designation. We would welcome the opportunity to meet with the Council in the near future to discuss these projects – notably pre-application discussion to start soon for new SEND school to south of Easton which will house 170 pupils including nursery and special autism unit. • DfE loans to forward fund schools as part of large residential developments may be of interest, for example if viability becomes an issue. Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of schools where and when they are needed. 	
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<p>22235 Marlingford and Colton PC</p>	<p>Comment</p>	<ul style="list-style-type: none"> • Already sufficient allocations for housing in JCS to keep pace with predicted rates of development. Exception should be Norwich which needs to prioritise brownfield first. • Additional sites should be in/close to Norwich for sustainability and environmental factors. • JCS allocations should be built before new allocations made (phasing). • Existing settlement hierarchy should be kept – ‘village clusters’ is against environmental goals which relies on school space rather than infrastructure • Growth has moved away from NDR making its impact on environment and finance unnecessary • Affordable housing is needed but no demonstrable requirement for scale and category of housing proposed in GNLP • Whitehall’s projections are questionable and will create wrong category of housing in wrong locations • GNLP encourages social engineering where buyers with equity release pockets from other cities (who prefer greenfield locations) are preferred • Disconnect between developers and communities needs. Need to protect rural environment has only slight recognition. Many sites fail basic environmental and sustainability tests. • Those struggling to afford housing (younger, local and not on property ladder) continue to be locked out. • Push for regulatory reform to deliver the needed affordable housing on sites supported by appropriate infrastructure. • Little suggests plan can achieve its aims meaning environmental & sustainable objectives need not exist. Plan seems to weaken existing communities, create more dormitory estates, force more commuter journeys, depress rural economy, reduce quality of life and negatively affect climate. 	<p>Consider the comments made through policy 1 on the strategy.</p>
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<p>22237 Liberal Democrat City Council Group</p>	<p>Comment</p>	<p>10 point plan based on meetings with Lib Dem councillors and Norwich City, Broadland District and SN District Councils</p> <ol style="list-style-type: none"> 1. Invest in CrossRail for Norfolk to link county to knowledge economy in Cambridge/Oxford corridor – build new station at Thickthorn on southern edge of city. Expand Wymondham station is a half measure that won't reduce car use and will increase infill pressure along A11 2. Establish bus hubs in rural hinterland where arterial routes to Norwich are timetabled with smaller buses covering rural villages & connect with main operators 3. Sustainability to be heart of development plans including green corridors, adequate bus/cycle routes and ambitious low carbon & renewable energy requirements 4. Discourage housing on flood plains, if necessary ensure accommodation is first floor or above 5. Oppose village clusters – 9% growth is unsustainable and contradicts climate change measures in plan 6. NCC housing plans should be designed with needs of elderly at their heart 7. Requirements for developers to provide adequate affordable housing 8. Good health needs to be in plans; easy access to facilities, walking/cycling encouragement, more GP services and health clinics 9. Fix school funding gap. £70 million gap in budget for new schools needed to support housing plans. 10. Create road & transport strategy for county to cope with increased population and pressures created. 	<p>Consider the comments made through policy 1 (the strategy) and 4 (infrastructure).</p>
<p>22238 Public</p>	<p>Comment</p>	<p>Housing</p> <ul style="list-style-type: none"> • Affordable housing needs to be affordable – another part of country is taking local economics and salaries into account for affordable house prices. Scheme in parts of Cornwall gives local long-term residents priority for affordable housing 	<p>Consider the comments made through policy 1 (the strategy), 2 (sustainable communities including landscape protection), 3 (environment) and 5 (homes).</p>

	<ul style="list-style-type: none"> • Developers need to provide enough affordable housing, higher percentage needed which should rise in scale with developments taking place. • Should also be a bungalow requirement for aging population which also needs to be affordable – this would allow people to downsize and free up larger family homes • Developers should have a time limit once given permission • Local, smaller building firms should be supported and involved in developments maybe by ensuring some building land is sold in smaller blocks to make it viable. Would improve variety (possibly quality) of housing • Housing needs to be varied; bungalows, houses, flats from 1 bedroom up. <p>Location</p> <ul style="list-style-type: none"> • More emphasis on brownfield sites • Need to maintain productive farmland, too many greenfield sites allocated • Needs to be limits on expansion e.g. Wymondham which has had growth not included in original town plan, it may end up connected to Hethersett and Norwich and lose it’s unique character • No oversize developments in villages, kept in proportion to village size • No approval for developments on land susceptible to flooding – EDP article highlights where this has failed and includes Hethersett, Hethel, Wymondham etc. • Council should ensure development around NDR occurs between city and new road to ensure it does not occur into the countryside – designate northern side as greenbelt • New settlements in the middle of the countryside will lack necessary infrastructure and destroys greater areas of the environment. <p>Environment</p> <ul style="list-style-type: none"> • Avoid overdeveloping farmland which affects productive land and wildlife e.g. farmland birds, many of which are on the conservation red list for declining numbers 	
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		<ul style="list-style-type: none"> • No permission to be given if established trees/ ancient woodland would need removing. Newly planted woodland of saplings elsewhere will not replace a mature habit, its biodiversity, food sources and shelter for the species dwelling within. • EDP have reported that many planted trees die due to neglect (EDP date 7/12/2019 page 2) • No permissions for developments which would destroy natural habitats (wetland, woodland, heaths etc) which are Popular attractions and protect species <p>Supporting EDP article 4.1.20 Keith Skipper</p> <ul style="list-style-type: none"> • Consideration needed for; • increased traffic, traffic accidents, pollution, congestion, parking and roadworks. • Increased pressure on schools, dr's and hospitals • Green spaces for recreation & relaxation • Quality of life and community cohesion • Does the loss to the environment and long-term denial make any sense? 	
22243 Public	Comment	<ul style="list-style-type: none"> • Prefer new towns with their associated infrastructure to additions on town/village edges. • For large village/town developments, infrastructure/facilities need to be mandated • Facilities needed in early phases • Housing needs to be to high environmental standards which will be cheaper than retro-fitting and will place costs on land owner/developer • Ensure delivery of social/low cost housing <p>AYLSHAM comments</p> <ul style="list-style-type: none"> • Additional Aylsham High School facilities already committed, dishonest to link to future developments. • For further developments there should be the following in place; high school to have sixth form, new facilities (supermarket, dr, dentists, social hall, 	<p>Consider the comments made through policy 1 (the strategy), especially in relation to the preference for new settlements to meet growth needs.</p> <p>Consider specific comments on Aylsham when reviewing policies 4 on infrastructure and 7 on the main towns, as well as the site allocations in the town.</p>

		<p>sports facilities), refurbishment of pavilion on nearby recreation ground, water/sewerage provision with consideration of eco=projects such as communal heat and power, bus stop on A140 for X40 fast coach link to Norwich with footbridge over main road.</p> <ul style="list-style-type: none"> • Review traffic plan incl. making Burgh Road/Sir Williams Lane one way. Roads overloaded and buses force traffic onto pavements • Review parking and action in Aylsham centre - well-lit footpaths/cycle ways • Ensure social/affordable housing is provided for local people • Build to highest environmental standards • South East of town between boundary and A140 should be considered as a whole; the 1,000 homes need appropriate infrastructure and facilities via expansion or new provisions • Developments to be properly finished, Willow Park's recreational facilities and paving was unacceptable • Burgh Road and Cromer Road sites will likely both eventually be built. Should be done so in a joined way so developer commitments are minimised 	
22247 Public	Comment	<ul style="list-style-type: none"> • Policy reference to NCC objective to be carbon neutral by 2030 to be discussed in relevant sections of plan. • Plan at risk of being out of date before adoption (e.g. p62 last para Local Energy Efficiency Policy should be actioned now in light of NCC resolution (maybe include in Interim section discussed below) • Interim guidance section could be at beginning covering actions to be taken before adoption date • P23 para 82 – reforestation should be highlighted with importance of tree planting here. Add text to inability to introduce green belt under national policy saying 'other measures may become necessary in the future.' • Policy 2 p56 Table 8 item 3 add to interim guidance • Policy 3 p64 items 184-187 should relate to NCC 2030 aim and included in interim guidance 	<p>Consider the specific comments made on each issue.</p> <p>Note that the NSPF has been approved and will continue to be updated as a when required.</p>

		<ul style="list-style-type: none"> • P66 Para 193 reference to draft Norfolk Strategic Planning Framework could be seen negatively as one plan is more advanced than the other. NCC's 2030 carbon neutral aim should take precedence • Policy 3 P68 Natural Environment should include importance of reforestation to mitigate climate change. Include government's select committee's recommendations. Should also support NCC to develop portfolio or register of landowners who are willing to plant more trees now (Woodland Trust planted 3.3 million new trees in 2018) • Expect to see future tree planting figures in draft Norfolk Strategic Planning Framework . • When is NSPF programme to be adopted? 	
22255 Le Ronde Wright	Comment	<ul style="list-style-type: none"> • Need to review Hethersett/ Cringleford, and possibly Wymondham/ Hethersett, strategic gaps. Evidence base considered lacking. Need further detailed assessment to examine impact of proposals in the GNLP. • NPPF requires preparation and review of landscape policies to be underpinned with adequate, up-to-date and relevant evidence. • To inform the GNLP a review similar to the 2012 SN Local Landscape Designation Review: Strategic Gaps/ Important Breaks by CBA is needed. • Cringleford, Hethersett and Wymondham key locations for growth and are sustainable while meeting local community needs and respecting environment. • Given recent approvals/ planned interventions in strategic gaps in response to development pressure in and around Norwich it is appropriate a new review of local landscape designation is carried out. • Appointed by trustees, with Sheils Flynn, to assess the impact of proposals on Hethersett-Cringleford Strategic Gap, we found there is a need to protect landscape between settlements. However there may be more appropriate ways to achieve this that current strategic gap designation 	Consider the comments made through policy 1 the strategy and policy 2 which includes landscape protection policy.
22296 Barton Willmore	Comment	<ul style="list-style-type: none"> • Support policy area focused toward Norwich City 	Consider the comments made through policy 1.

		<ul style="list-style-type: none"> • The NPA enabled growth focused in the right areas to deliver Norwich-centric spatial strategy allowing for appropriate monitoring • SHMA identifies NPA does not form a functional HMA. Growth Options Consultation Document identified in GNLP would no longer include NPA specific housing land supply • Draft strategy doesn't reference the NPA or the Core-Area which SHMA identifies as a functional HMA • Object to loss of Norwich focussed Policy Area – Draft strategy confuses role of SHMA for purposes of determining Housing Needs and a specific policy based area to ensure right growth is in right area. • Greater Norwich Technical Report shows the NPA to be an appropriate growth area with suitable Travel to Work Area where future job growth will be focussed. • The GNLP evidence base further provides support for a functional HMA, in the form of a 'Core Area' (including Acle, Aylsham and Loddon). However, given no other settlements outside this area are sufficiently self-contained to establish a separate HMA (or areas), the SHMA concludes the most appropriate HMA, for the plan, is the Central Norfolk HMA. • Clear evidence an area exists with the strongest functional connection to Norwich Urban Area. • Strongly urge GNLP to continue NPA approach directing growth to defined area with strongest functional relationship to Norwich. Boundary should reflect the preferred spatial strategy i.e. A11 focus. • Without Policy Area focusing growth in key location, strategy risks failure 	
22525 Broadland Green Party	Comment	<ul style="list-style-type: none"> • Which initiatives achieve the objectives to protect environment, habitats and create new green spaces. • Full dualling of A47 conflicts with this. • Map 4 in section 2 shows remaining major habitat sites in Norfolk will soon be flooded – where will species be relocated to? 	Consider the broad range of comments made.

		<ul style="list-style-type: none"> • Large amount of increased demand comes from internal migration from places like Kent and the Midlands where developed environments have led to high crime, poor air quality, traffic congestion, bleak town centres with failing businesses, a plague of loneliness and mental health issues and degraded countryside. Planning needs to enshrine quality of life we are able to enjoy and not enslave ourselves to growth with all the disadvantages it can bring 	
22534 Public	Comment	<ul style="list-style-type: none"> • Website not fit for purpose, excessively complex and cumbersome. • No postal address apparent on website 	Comments noted. Every effort has been made to make the website covering a large number of sites and policies accessible. Postal information was available on the website.
22548 Historic England	Object	<ul style="list-style-type: none"> • Policy for tall(er) buildings, scale and massing needed. • Essential a tall building study undertaken to provide evidence base and contribute to development of appropriate tall(er) buildings policy and consider massing. Should investigate important key views of city, the skyline as a whole and contribution it makes to Conservation Area, and the wider historic environment. Should establish if and where tall(er) buildings should be. • Developing a height and mass policy it will help secure sustainable development of high quality that protects and enhances historic environment of character and significance of the city. 	Consider comments made through policy 3, with further liaison with Historic England. This will need to take account of the strategic nature of the GNLP and its role in providing the hooks for more detailed policy requirements through DM policies and/or SPDs.
22549 Historic England	Object	<ul style="list-style-type: none"> • Policy for Design needed • Appreciate may be within DM policies • Encourage provision for historic environment through the plan, not solely within heritage focused policies. • Seek specific requirement for consideration of historic environment within design policies of local plan which should seek to draw on opportunities offered by the historic environment and reflect local character and distinctiveness. 	Consider comments through policy 2 which covers design.

		<ul style="list-style-type: none"> • Should not stymie contemporary development but require appreciation of significance and character of historic environment in producing a high standard of design. • Highlight recent publication Building Better Building Beautiful Commission report which may help this 	
22641 M Scott Properties Ltd via Bidwells	Comment	<p>Relates to the Greater Norwich Local Plan, Interim Viability Study, prepared by NPS Group (November 19).</p> <p>General support for the approach adopted & collaborative approach the GNLP Team are seeking, concerned that assumptions within Viability Study (sales values, build costs and benchmark land values) are too generic and not backed up by comparable evidence.</p> <p>Concern that typologies used within the Viability Study are too general and do not reflect the allocations within the draft GNLP. e.g. the largest size development appraised within the Viability Study is 600 units, notwithstanding the fact that a number of the carried forward allocations / preferred sites are well in excess of this figure. These larger sites are likely to require the more significant infrastructure obligations i.e. primary schools and health centres, so an assessment of viability and the implications for deliverability is key. To ensure a more robust and realistic approach we would suggest that site specific viability studies are undertaken of a selection of the preferred sites of varying sizes.</p> <p>As part of this work, consideration should be given to whether it is viable for some of the larger strategic sites, which have high infrastructure costs associated with their delivery i.e. the requirement to provide schools and health centres on land which otherwise would be land developable for alternative uses, to pay the Community Infrastructure Levy, in addition to the policy requirements of the Local Plan.</p> <p>The potential for infrastructure costs which are specific to larger strategic sites to be secured by appropriate and negotiable Section 106 planning obligations, in order to ensure that such sites are deliverable and, importantly, that there is certainty regarding the timely delivery of the infrastructure on site, should be</p>	Consider comments through additional work on the viability study

		<p>fully explored. This approach, which has been adopted by Mid Suffolk District Council, is entirely consistent with the Community Infrastructure Regulations (2019).</p> <p>In addition to the foregoing are comments made on the Interim Viability Study, with specific regard to Policy GNLP 0337, Land between Fir Covert Road and Reepham Road, Taverham and Typology 9 – see Viability document</p>	
22686 Public	Comment	<ul style="list-style-type: none"> • Net Zero target is in line with UK legislation but expected to match local council policies and be in shorter time frame. • Renewable energy is supported by GNLP within local/ neighbourhood plans – sounds like won't be supported without these plans. Doesn't mention strategic siting for onshore renewable energy the region could benefit from. If encouragement is desired would be preferable for a secondary exercise with grading of land on basis of suitability. What about making available or encouraging local ownership of renewable energy assets to community schemes? • Sustainable Transport mentioned but frequent contradictions in terms of additional road building – what were the alternative options? Norwich Airport may not survive coronavirus, what about ferry services? Electric vehicles mentioned but no details on EV infrastructure. Improved train services mentioned but no specific plans for land that may be required (e.g. HCA plan to develop train route between Oxford-Cambridge with possible Norwich extension). Many different transport plan references without sense of an over-arching strategy. • Broader flood resilience plan is lacking. Agriculture mentioned for high use of water but no plans to address farming practices, moving to more regenerative/resilient approach. No apparent strategic approach to nature-based solutions in area to protect existing infrastructure. Particularly support for innovation to tackle climate change and adaption (e.g. silvopasture etc) 	Consider the broad range of comments made.

		<ul style="list-style-type: none"> • Resilience framework could be useful e.g. experiences from Rockerfeller 100 Resilient Cities project may help create systemic insight into integrating resilience into all aspects of planning and operations. Could bolster Norfolk’s local food economy via local supply networks to enable connectivity between food producers and consumers. Enhanced investment in broadband is needed to reduce travel demand and enable home working, aided by sustainable logistics and delivery mechanisms. • Green space not just for environment but for social wellbeing. There are currently problematic situations caused by insufficient funding and community devolution – e.g. disused bowls and tennis areas locked up on Heigham Park. Quality green space within cities help support mental health in times of crisis. • Strongly recommend use of Citizen’s Assemblies in judging some of the decisions as they arise in fine tuning the plan. This will help engage wider population, making public more aware of part they can play, bring in their own ideas and help make desirable transitions quicker and more effective. 	
22687 Smart Growth Associates	Comment	<ul style="list-style-type: none"> • Suggest, for plan to be robust, the GNDP adopts a strenuous approach to securing sustainable growth in its land use, economic and infrastructure planning. Do not consider plan currently meets the challenge of delivering sustainable development. • GNDP should subject GNLP to most rigorous test of planning for sustainable growth • Contend that, for growth to be sustainable, infrastructure, economy & land use should be planned at county level through separate but complementary exercise. GNLP area is wide but Norwich’s travel to work catchment is the whole county. Due to lack of major competing centre, there is reliance on Norwich for culture, education and training as well as retail and entertainment. Vital these amenities are accessible to all. We set out in the joint Create, SGA and Others’ representation the need to interrogate an additional light rail transport proposition for greater Norwich as part of this. 	Note view that a county wide spatial plan should be produced rather than the current approach of producing the Norfolk Strategic Planning Framework to ensure a coordinated approach to county wide issues through local plans.

		<ul style="list-style-type: none"> • Building Better Building Beautiful Commission Report ‘Living with Beauty’ proposes the need for county level planning to produce coordinated spatial, infrastructure and economic plans in co-operation with their constituent city/borough/district authorities and the local enterprise partnership. This will ensure water, waste, movement, power networks, energy and digital are planned in a rational and coordinated way with a sustainable land release approach to support sustainable development and enable public value capture. This is essential before land allocation can take place and we propose a county level spatial plan, coordinating with the LEP economic and infrastructure strategies needs to be taken forward with delivery of sustainable, resilient development as an explicit goal. • This has been partly undertaken through GNLP exercise to investigate Norwich Cambridge Tech Corridor but brief did not require consideration of overall growth for the county; limited public consultation, full set of environmental constraints not investigated with economic opportunities. The Norwich-Cambridge Tech corridor strategy and the district plans present a fragmented approach to advancing a sustainable and coordinated growth strategy for the whole county and need to be brought together through wider county lens for sustainable development to be planned to 2038. • GNLP need to work with NCC and New Anglia LEP to consider integrated spatial plan for Norfolk before agreeing to infrastructure and land allocations. • Norfolk and Norwich has potential to lead in commissioning and developing an integrated regional infrastructure and spatial model. Modelling work that underpins the Tech Corridor goes some way towards this but does not consider whole county. There remains an opportunity for Norfolk to work with leading edge consultants through a pilot project to pioneer and test the capacity of integrated spatial modelling to support strategic scale planning, and to coordinate planning for growth with the analysis work currently being 	
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		<p>undertaken for rural interests including Norfolk County Council to support the DEFRA land use pilot.</p> <ul style="list-style-type: none"> We therefore suggest that, in order to meet the test of sustainable development embedded in the NPPF, there is an urgent need for the GNPP 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 NALP economic and infrastructure strategies around a place-based spatial vision and strategy. Without this prior exercise the GNPP cannot be demonstrated to represent a robust approach to sustainable development. 	
22688 Public	Comment	<ul style="list-style-type: none"> 1,200 minimum dwellings throughout SN village clusters is concerning. The villages can be far from Norwich and its services, infrastructure, hospitals etc. How can this be justified when an aim is to reduce private car travel? 1,200 figure should be reduced. Has effect of internet on High Street been factored? Could substandard dwellings be brought into use? 	Consider the comments made through policy 1 (the strategy) and policy 6 (the economy).
22690 Public	Comment	<ul style="list-style-type: none"> Difficult to comment given 1277 pages for HELAA and 150 for Growth Options. Approach is appropriate subject to evolving Government policies. Helpful for Reg 19 stage to have designator to indicate if landowners are prepared to sell their land for development. Encouraging that we have sufficient employment land. <p style="text-align: center;"><u>Comments on 2018 Growth Options document</u></p> <ul style="list-style-type: none"> 4.15-6 – homes needed doesn't reflect figures showing large numbers of over 65s and under 24s more likely to live at home Q4 yes probably Q5 yes to 10% uplift Q6 yes to windfall sites being included, better to err for too many homes. Can we see update of 5 year land supply figures (Latest April 2016)? Is there 	Consider the broad range of comments made.

		<p>a precedent for accepting windfall in one are to offset another? Stop developers promoting 'off plan' sites because of a lack of 5 year land supply at the point of application – this goes against an orderly planning process</p> <ul style="list-style-type: none"> • 6 options – need for 7,200 additional homes noted as is the plan to split 3,900 baseline and remaining 3,300 to be dealt with through 6 options • Q9 – Option 1 is attractive, meets governmental policy and favoured politically. People more likely to live in Norwich due to its proximity to jobs, leisure, culture and entertainment. Those who live in market towns/villages/hamlets more likely to prioritise countryside living and want to avoid considerable growth, particularly with limited infrastructure • Option should be read with Q22 with regards to Wymondham. Restricting growth to a share of 550 would rebalance the allocations. Wymondham has potentially 5,000+ homes based on proposed sites which would seriously affect character/heritage of this market town. • Q12 – support given there are employment opportunities proposed. Note long timescales and infrastructure issues make this less popular. Only supported for both areas if everyone involved agreed. Why do developer propose sites close to heritage assets? • Q17 what is LGA position? Consider online shopping before expanding or q19 may answer itself. • 6.37 – growth of A11. Consider impact on neighbouring communities with traffic re-routed for roadworks. • Rail Growth – 2 trains an hour would be a start. • Q41 More bungalows with small gardens needed for over 65s. Or 4-5 bed houses to meet needs of ALL generations. Separation of some ground floor as small, private space with shower room may accommodate elderly relatives, this could free up homes elsewhere. • Para 6.98 – pleased work is being done on this. Assume elderly residents have been consulted as well as geriatricians, planners, social workers etc? 	
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		<ul style="list-style-type: none"> • Q42 Propose that for site opposite Wymondham Station, bid for funds to clean area and build a small retirement village to meet varying levels of health needs. • Q56 Keep strategic gaps to keep boundaries and characteristics of settlements. 	
22705 & 22795 M Scott Properties Ltd via Strutt & Parker LLP	Comment	<p>Viability generally supportive but have observations in respect of the detail which we hope are helpful:</p> <p>Density (Table 4)</p> <ul style="list-style-type: none"> - Net areas are only used on Typologies 6-9, but are also applicable to Typology 4, where sites will also be required to provide on-site public open space, green infrastructure and SUDS, as well as often needing to 'gift' land for community uses. - The density figures are presumably based on the indicative mixes in Table 5, but these do not have any allowance for housing for older people (single-storey), which will again reduce density. This will mean that the proposed density of 25 dwelling per hectare (gross) will be difficult to achieve where large proportions of bungalows are to be included. - The net: gross ratios are likely to be circa 66% on these sites, meaning a net density of circa 38 dph will be needed. <p>Housing Mix (Table 5)</p> <ul style="list-style-type: none"> - As mentioned above, there is nothing for single-storey accommodation, for example housing for older people and accessible housing, despite the strong demographic arguments which demonstrate the need to provide accommodation for an ageing population. - While housing need may suggest the proportion of 3 bedroom homes should be high in the Main Towns, demand for market properties is likely to be higher for larger family properties. Such a high percentage of two bed houses seems high at the expense of 3 and 4+ bed family housing in the Main Towns. In particular 8% of 4+ seems very low. Market demand is likely to be circa 20% of 	Consider comments through additional work on the viability study.

	<p>the private dwellings with 4+ bedrooms (13% aggregated).</p> <ul style="list-style-type: none"> - The 20% for flats also seems high, the market for private flats is limited in rural locations, so we would expect this to be closer to 10% overall. <p>Size of Dwellings (Table 6)</p> <ul style="list-style-type: none"> - Again no information has been provided for single-storey properties. - The 3-bedroom house size (102 sq. m) is for a 6-person property, so comes out large at 1,100 sq. ft. <p>Affordable Housing (Table 7 & Table 15)</p> <ul style="list-style-type: none"> - Typology 4 (Main Town) is assessed at 28% Affordable Housing but 33% is sought by policy. - At 28% (and with current assumptions) it is the 2nd least viable (£115,872 surplus) and as such, on the Sensitivity Testing it fails across all scenarios. - Affordable Rent – 60% is very ambitious as a return, it is recognised in the report that the range is 45% to 65%, so 50% would be a better assumption to use. - Affordable Ownership – again it is recognised that the range can be 60% to 80%, so 70% would be a better assumption than 75%. - As mentioned in the caveats, no account has been taken of the 5% custom build policy requirement. <p>Access</p> <ul style="list-style-type: none"> - For specialist housing developments, all (not just 20%) of homes will meet at least the M4(2) access requirement, which adds up at £940 per dwelling. It is our consideration that a new house type is required for the Study. <p>RAMS</p> <ul style="list-style-type: none"> - A justification is required in relation to the recommendation for £200 per dwelling. This was recently revised down to £122 in neighbouring Suffolk. <p>Market Revenue</p> <ul style="list-style-type: none"> - The values do not correlate with what is currently on the market, especially for the 4 bedroom properties, for which the values are overstated by as much as 33%. The below tables (see attachment) show all of the new build (estate) 	
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	<p>houses on Rightmove as of the 18th February 2020.</p> <p>Build Costs</p> <ul style="list-style-type: none"> - The costs for Bungalows will be higher than £1,221 per square metre and it is suggested that consideration of bungalows is included within the Study. - The costs for Garages have been contained within the site and infrastructure costs. CIL will also be payable on the garages which will increase the cost. - No allowance is made for ground conditions / ground water protection / flood risk. It is important that these are factored in. <p>Sites and Infrastructure Costs (Table 10)</p> <ul style="list-style-type: none"> - 15% seems low for site and infrastructure costs, it is considered that these costs will rise over the Plan period with increased electricity requirements etc. <p>CIL/S106 (Table 11)</p> <ul style="list-style-type: none"> - As mentioned above, Garages have been excluded but will be chargeable. - For Typology 4 – the majority of the Main Towns are in Zone B so it would make sense to use the appropriate figure. - The 2020 figures are now available and as such should be used (£70.46 per sq. metre). - No allowance has been made for site-specific Section 106 works such as Public Rights of Way improvements etc. <p>Benchmark Land Value (Table 12a)</p> <ul style="list-style-type: none"> - The figure for Typology 4 is £432,432 / ha = £175k / acre (gross). This does not reflect that most land is purchased at a discount to reflect the planning and promotion risks / cost time. It also doesn't consider sales agent and legal fees. - Taking the example in the report shown below, the figure should be revised accordingly and checked against actual transactions to show that the transaction levels (and therefore expectations) are still far higher at circa £300,000 gross per acre. - 7.5 acres @ £175k per acre = £1.312m ♣ minus Agent's Fees @ 1.5% = £1.292m ♣ minus Sales Legal Fees @ £10k = £1.282m 	
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		<ul style="list-style-type: none"> ♣ minus Recoverable Promotion Costs @ £150k = £1.132m ♣ minus Promoter's Share @ 20% = £906k ♣ = £121k per acre (= EUV x 12, not 17.5) 	
22764 Public	Object	<ul style="list-style-type: none"> • Note that GNDP is not a decision-making body and only advises and steers with recommendations to its constituent authorities • What confidence can public have in GNDP/GNLP if members from constituent bodies on the board are approving policies for recommendation to their own councils but then considering they have carte blanche to amend the details of previous recommendations after adoption without reference back to either elected council members or GNDP board. • Where is the democracy in this process? 	Note views expressed. The GNDP makes recommendations to the district councils which are responsible for progressing and adopting the plan.
22778 Broads Authority	Comment	<ul style="list-style-type: none"> • 'Post carbon economy' is referred to but is it well defined, does it adequately cover climate change, mitigations and adaption? No mention of other greenhouse gases. Check relevance of term in all its uses throughout document, consider defining term. • 'Inclusive growth' referred to – what does this mean and what does it include? • Refer to singles issues of BREEAM (energy and water on their own) – BRE do not recognise the use of single issues, a whole scheme is needed to meet BREEAM criteria, may need to contact BRE to ensure deliverability of approach. <p>Detailed comments</p> <ul style="list-style-type: none"> • Box, page 6, Para 4, last sentence: refers to some aspects being repeated. what is repeated? • Page 8, para 1: has the Broads Local Plan & Broads Plan influenced the document? Should they be mentioned? • Page 24, para 95: do you mean increases of between the two figures quoted in each bullet point? Adding the word 'between' might make it read better. • Page 28 – you refer to the Broads as a National Character Area, but it has the status equivalent to a National Park and is a Nationally Protected Landscape. 	Consider amending the plan based on the broad range of detailed comments made.

	<p>Please say those things in this section of the Local Plan.</p> <ul style="list-style-type: none"> • Page 29, para 105 – have you thought about addressing peat and other carbon rich soils in the Local Plan? • Page 32, para 119. You mention houseboats later on in the document, but could that be mentioned here – along the lines of ‘working with the Broads Authority, so too will the needs of houseboats be met’? You may want to also note that the Broads Authority refers to residential moorings rather than houseboats. You may want to clarify that in your Plan. <p>Page 34, environment section of vision – recommend you mention the landscape impact on the Broads & its setting.</p> <ul style="list-style-type: none"> • Page 35, Environment objective – what about the setting of these things? • Page 38, climate change statement – have you thought about carbon rich soils like peat? Have you thought about heat, cooling and extremes of weather (not just the effect of flooding)? • Page 46, a how does this split fit with what is said at para 132? • Page 51, Policy 1, bullet 2 – what do you mean when you say ‘local level’? • Page 51, Policy 1, ‘support vibrant communities’ – do you mean help ensure communities remain or become vibrant? • Page 52, Policy 1, second para under table: where you refer to negative impact on the character of the settlement, it seems also prudent to refer to the area in general – for example to consider the impact on the Broads and its setting. • Page 61, policy 2: The first paragraph ends with ‘as appropriate’ – what does that actually mean in terms of applying the policy? What does ‘sustainable access’ actually mean? ‘What are ‘local services’? Point 10 – would that standard be in place until a Government standard is put in place? Is that worth saying in the policy? • Page 62, footnote 73 – is that policy wording? Or is that policy in the DM documents of the districts? If that is the case, you might want to clarify that. • Page 66, para 193 – NSPF version 2 is not draft, it is endorsed. The emerging NSPF is version 3. 	
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	<ul style="list-style-type: none"> • Page 72, para 212 – refers to 2019. You might want to update this in the next version of the Local Plan. • Page 76, policy 4, transport. You talk of non-car developments and high densities in Norwich. Other places like towns have good access to services and public transport – are they going to have non-car developments and high densities? • Page 79, para 248 – support reference to the Broads Authority and houseboats – please add something like ‘...for residents of houseboats in the area, through policies that enable the delivery of residential moorings.’ You may want to also note that the Broads Authority refers to residential moorings rather than houseboats. You may want to clarify that in your Plan. • Policy 5 supporting text – is it prudent to say that the Broads Authority will have regard to/defer to the affordable housing policies of the districts and so this policy will also be used, in parts, by the Broads Authority? • Page 81, Policy 5: The first para uses the term ‘should’ a few times – is that weak wording? Under affordable housing – does it matter that an applicant might say they are sub-dividing a site for another reason and so could do it? Is it more that sub-dividing is not allowed, and that is because some developers may seek to avoid affordable housing obligations? What is ‘good access’? • Page 81, Policy 5: what is ‘sustainable access’? What are ‘ancillary uses’? Marketed for up to or at least 12 months? How should they be marketed? • Page 83, para 1: ‘...tenures of homes within...’. Para 3, what are locations with ‘good access’ – we say within a development boundary. Another consideration for location of such facilities is how staff and visitors can access it. Para 5 ‘...encourages new sites...’ • Page 87, policy 6: What are ‘significant residential and commercial developments’? • Page 95, map 9 – do you include the part of the Utilities Site that is in the Broads – suggest you do and maybe show it in another colour and amend the key accordingly. 	
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	<ul style="list-style-type: none"> • Page 99, para 2 – isn't office to residential permitted development? • Page 100 – East Norwich. Is the East Norwich Strategic Growth Area Masterplan SPD in place? How will the Broads Authority be involved in its production? Is that the same thing that is referred to in the next para before the next bullet points? Should you refer to, even if it is as a footnote, that some of the Utilities site is in the Broads and there is a policy in the Local Plan for the Broads for that and that is consistent with this policy and we will work together etc? • Page 111, Para 346: '...as shown in appendix 5...'. What is 'good access'? What is a 'safe route'? • Page 112, policy 7.4, final para above 'employment': what about impact on character of the nearby area like the Broads. • Page 114, policy 7.5 – do you want to say 'subject to other policies'? Does the approach contradict page 113 '..without breaching normal planning criteria and the sustainable site selection process'. • Page 114 – is another alternative to not allow this approach? <p>Typo/grammar</p> <ul style="list-style-type: none"> • Box, page 6, Para 4, first sentence: 'documents will be assembled and as part of the next stage...' • Page 7, para 6: 'This will ensure that Norwich continues to be both...' • Page 24, para 91: 'flood risk in new development, locating development the great majority of development away from...' • Page 53, end of footnote 62: '...based on the feedback and for each site.' • Page 56, para 173: 'The Sustainable Communities policy are wide ranging'. 'Community policies are' or 'Community policy is'? • Page 57, densities row: '...for different parts of the area' • Page 78, para 239 – 'it also includes minimum...' • Page 90, para 267, bullet iii: 'the essential role that of the other parts of the urban area...' 	
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		<ul style="list-style-type: none"> • Page 93, top: ‘...of key city centre..’ • Page 114, para 350: “through policies other policies in this plan’ <p style="text-align: center;">General Sites comments</p> <ul style="list-style-type: none"> • Suggest bullet points numbered for ease of reference • Concerned that Strategic ecological gain is not translated into site policies e.g. no site specific reference within GNLP GI Corridor despite sites like Acle being in the junction of major adjoining corridors. Expect these biodiversity intersections to have enhancing wildlife corridors highlighted on a site basis. When Net Gain requirement is introduced via the Env Bill will this be picked up at this point? • Some allocations/reasonable alternatives are on/close to deep peat resource so relevant to include treatment of carbon rich soils and reference to net zero targets. Excavation of deep peat is significant emitter of carbon into atmosphere so should be shown to influence site choice. • We safeguard former rail tracks from development for their potential future use as PROWs. • Are you able to include a policy to safeguard the land from development? 	
22818 Marine Management Organisation	Comment	<p>Although GNLP does not have a coastline, there are several tidal rivers and waterways. The East Inshore Marine Plan (EIMP) area extends to Norwich on River Yare as well as to Wroxham on River Bure, and near Ellingham on River Waveney. the extent of marine plans can be seen on our online marine planning portal.</p> <p>GNLP may wish to make reference to the MMO’s licensing requirements and the relevant marine plans (EIMP mentioned above) to ensure the necessary considerations are included</p> <p>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/312496/east-plan.pdf</p> <p>All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan (see link</p>	Note MMO comments on the plan as a whole and assess how these should be taken account when making the amendments to policies.

	<p>above) or the UK Marine Policy Statement unless relevant considerations indicate otherwise. LA's may wish to refer to our online guidance, marine plans and planning advisory service soundness self-assessment checklist.</p> <p>Marine Licensing The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area. The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters. The marine licensing team are responsible for consenting and regulating any activity that occurs "below mean high water springs" level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.</p> <p>Summary notes</p> <p>Please see below suggested policies from the East Inshore and East Offshore Marine Plans that we feel are most relevant to the Greater Norwich Local Plan. These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the East Marine Plans is completed:</p> <ul style="list-style-type: none"> • EC1: Proposals that provide economic productivity benefits which are additional to Gross Value Added currently generated by existing activities should be supported. • EC2: Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas. • EC3: Proposals that will help the East marine plan areas to contribute to offshore wind energy generation should be supported. • SOC1: Proposals that provide health and social well-being benefits including through maintaining, or enhancing, access to the coast and marine area should be supported. • SOC2: Proposals that may affect heritage assets should demonstrate, in order of preference: 	
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		<p>a) that they will not compromise or harm elements which contribute to the significance of the heritage asset</p> <p>b) how, if there is compromise or harm to a heritage asset, this will be minimised</p> <p>c) how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against or</p> <p>d) the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate compromise or harm to the heritage asset</p> <ul style="list-style-type: none"> • SOC3: Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference: <ul style="list-style-type: none"> a) that they will not adversely impact the terrestrial and marine character of an area b) how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them c) how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts • ECO1: Cumulative impacts affecting the ecosystem of the East marine plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation. • BIO1: Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas (marine, terrestrial). • BIO2: Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests. • MPA1: Any impacts on the overall Marine Protected Area network must be taken account of in strategic level measures and assessments, with due regard given to any current agreed advice on an ecologically coherent network. 	
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	<ul style="list-style-type: none"> • CC1: Proposals should take account of: <ul style="list-style-type: none"> • how they may be impacted upon by, and respond to, climate change over their lifetime and • how they may impact upon any climate change adaptation measures elsewhere during their lifetime Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts. • CC2: Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration should also be given to emissions from other activities or users affected by the proposal. • GOV1: Appropriate provision should be made for infrastructure on land which supports activities in the marine area and vice versa. • TR1: Proposals for development should demonstrate that during construction and operation, in order of preference: a) they will not adversely impact tourism and recreation activities b) how, if there are adverse impacts on tourism and recreation activities, they will minimise them c) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts • TR2: Proposals that require static objects in the East marine plan areas, should demonstrate, in order of preference: a) that they will not adversely impact on recreational boating routes b) how, if there are adverse impacts on recreational boating routes, they will minimise them c) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts • TR3: Proposals that deliver tourism and/or recreation related benefits in communities adjacent to the East marine plan areas should be supported. <p>Further Notes</p> <p>p8 – refers to NSPF which we were consulted on although we are not an additional signatory to the Statement of Common Ground, the document makes</p>	
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		appropriate reference to East Marine plans. Also recommend mention made of East Inshore and East Offshore Marine Plans in this section.	
22866 Crown Point Estate via Pegasus Group	Comment	<p>Appendix 1 Infrastructure requirements</p> <ul style="list-style-type: none"> Disappointed no discussion of Park and Ride system, or general bus infrastructure. Nor discussion of public charging points for electric vehicles. Note that P&R sites review is yet to be published but would point to proposed Loddon Road P&R site will complete ring of P&R sites to serve each radial road route towards the city and will facilitate electric vehicle charging points at construction stage 	Consider comments in producing updates to the infrastructure plan, along with the supporting evidence.
22867 Crown Point Estate via Pegasus Group	Comment	<p>Greater Norwich Local Plan Infrastructure Needs Report</p> <ul style="list-style-type: none"> no discussion of PA&R facilities of general bus plans – section 5.2 only discusses rail. To achieve sustainable transport aims it is key to provide additional bus capabilities and relevant infrastructure. Exclusion of bus infrastructure, including P&R, is an oversight that needs addressing. Clear need for P&R along A146 corridor, the GNLPINR needs an assessment of further P&R requirements to ensure appropriate infrastructure can be brought forward 	
22868 Crown Point Estate via Pegasus Group	Comment	<p>SA and SEA of the GNLP – Loddon Road P&R (GNLP 3051)</p> <ul style="list-style-type: none"> SA for Loddon P&R site is overly broad resulting in unjustified negative results; Objective 1 states air and noise pollution caused by its location adjacent to A146 – P&R has transitory users and will improve air quality within city centre by removing cars – should not be considered negative. Objective 2 location is Flood Zone 1 which is a positive as will locate end users on a site with least possible risk of fluvial and surface water flooding Objective 3 states negative due to being within 5km of Broads SAC and SPA and Ramsar, and within IRZ of Yate Broads and Marshes SSSI. The location 	Consider comments in producing updates to the SA

		<p>will not add direct pressure on these and any impacts can be mitigated within the design. Should be considered neutral.</p> <ul style="list-style-type: none"> • Objective 4 states would impact on local landscape character. Accepted that development would alter site but wider countryside could be mitigated through careful, landscaping-led master planning of site. A full Landscape and Visual Impact Assessment will be submitted at a later stage to demonstrate the landscape effects. • Objective 6 states negative impact on access to local services but a P&R allows greater ranges of users to access services via public transport? • Objective 8 appears to have been assessed like housing – being located away from N&N hospital and GPs is irrelevant to a P&R • Objective 11 – agree to be a major positive impact by creating jobs through construction, operation and benefits to Norwich economy. • Objective 12 findings contradicts purpose of P&R which improves access to bus services and access to the city centre in a convenient and sustainable manner. • Objective 13 minor possible negative impact on designated heritage assets would be taken into account within the masterplan and should not constrain allocation of site. • Objective 15 – Any risks can be mitigated through implementation of a robust drainage strategy tied in with use of appropriate hard surfacing across the site so there would be no negative impacts. 	
22869 Crown Point Estate via Pegasus Group	Comment	<p>SA and SEA of the GNLP – Park Farm (GNLP 0323)</p> <ul style="list-style-type: none"> • Objective 11 – Would result in net increase in employment floorspace to positively impact local economy • Objective 14 – Developing an existing brownfield site would contribute positively due to safeguarding greenfield land in Greater Norwich 	Consider comments in producing updates to the SA
22870 Crown Point Estate via Pegasus Group	Comment	<p>SA and SEA of the GNLP – WCP (GNLP 30252)</p>	Consider comments in producing updates to the SA

		<ul style="list-style-type: none"> • Objective 1 – notes possible exposure to noise/air pollution – traffic using A47 and A146 would be expected to have minor negative impact. Propose WCP is safeguarded for future country park-related development. • Railway Line – North of GNLP3052 is adjacent to railway line, development could expose users to higher levels of associated noise pollution and vibrations causing minor negative impact. • Air pollution – States development would increase local air pollution but site is proposed for open space and leisure creating a positive impact on pollutions • Objective 2 – stated as major negative due to being located in flood zones 2, 3a and 3b but due to extensive nature of site, proposed leisure development would be kept away from these areas. Should be positive impact in relation to GNLP3052 • Small areas within site are at risk of low, medium and high levels of surface water flooding – marked as negative due to this but this assumes built development which is not the case. Appropriate design management of the extensive green space will facilitate on-site flood attenuation, with knock-on reduction in risk to surrounding locations as a result of controlled run-off – should be seen as a major positive impact • Objective 3 – Proposal is to safeguard the additional WCP land for country park use; benefitting biodiversity by providing & protecting it on site and by providing leisure space reducing human pressure on designated habitats elsewhere • LNR – Site GNLP3052 agree with assessment that would have negligible impact on the Whitlingham LNR. • CWS – site GNLP3052 agree with assessment that would have negligible impact on the Old wood, Trowse Wood and Trowse Meadows CWSs • Priority habitats – GNLP3052 disagree development will result in any loss of priority habitats as safeguarding of site for additional country park use means they can be safeguarded and created. 	
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		<ul style="list-style-type: none"> • Objective 4 – Proposal is to safeguard the site for country park usage which would benefit country park as a whole so impact is positive • Landscape character – agree with assessment • Views from PRow Network – should be neutral given nature of development • Views for local resident should also be neutral • Objective 6 – should be neutral given nature of development • Objective 8 – should be minor positive given nature of development • GP Surgery/ hospital distance is irrelevant as not residential development • Objective 11 – agree with assessment • Objective 12 – bus stop could change with significant amount of development proposed in this area of Norwich and with development of Loddon P&R site. • Railway Station – site is mainly beneficial for local users • Pedestrian Access – agree with assessment • Objective 13 – can accommodate preservation of nearby listed building and conservations areas due to site being proposed for country park • Objective 14 – disagree – development is for a park not buildings • Objective 15 – should be neutral given nature of development 	
22878 Crown Point Estate via Pegasus Group	Comment	<ul style="list-style-type: none"> • SA and SEA of the GNLP –Octagon Farm (GNLP 1032 & 0321) • Objective 1 – sites do not fall within air quality management area and not proposed to be developed in a way that results in such a designation. • Objective 2 – design yet to be finalised, there are opportunities through GM policies to ensure carbon emissions are minimised • Development provides opportunity to incorporate on-site surface water attenuation to protect development and the listed Octagon Barn itself. By reducing off-site flows, development will also control peaks of flooding beyond site boundaries making a positive impact. 	Consider comments in producing updates to the SA

		<ul style="list-style-type: none"> • Objective 4 – should be neutral as site enclosed by vegetations and woodland to north – any landscape impact would be localised • Objective 5 – Agree with assessment • Objective 6 – site proposed for mixed use, opportunity to incorporate some top up provision, also bus stops adjacent to site. • Agree with local landscape designation assessment • Objective 8 – development provides opportunity to incorporate public open space and circular walks through masterplanning resulting in a positive impact • Bus stop enables access to GP surgery by public transport. • Bus stop also enables travel to the local leisure centre. • Objective 10 – bus stop also allows travel to schools. Agree with secondary school assessment. • Objective 11 – agree with assessments • Objective 12 – agree with assessment • Development of sites GNLP0321 & 1032 at Octagon Farm would mean both could benefit and facilitate access to PROW network • Objective 13 – Given intervening woodland to north of sites 1032 & 0321 and masterplanning, impact on heritage assets should be neutral • Objective 14 – Increase in household waste is expected of all residential developments. • Loss of undeveloped land and ALC land is inevitable with this significant number of dwellings and should be balanced by the positive impacts of providing housing, including affordable, and supporting local economy and community vitality. • Objective 15 – planning process will prevent occurrence of contamination as design is required to ensure staged filtration of surface water prior to reaching the groundwater. Heavy industry not proposed. 	
22890 & 23031	Comment	Viability comments	Consider comments through additional work on the viability study

Abel Homes via Bidwells		<p>General support but concerns assumptions made (sales values, build costs and benchmark land values) are too generic and not backed by comparable evidence</p> <ul style="list-style-type: none"> ● The assumed land values are too low and not representative of market values. Comparable evidence needs to be provided to justify the figures used. ● The assumption that 54% of dwellings are 3 bedroom is considered high. In addition, the number of 1 bedroom units will vary Norwich and the market towns, with the latter being lower. ● There appears to be no consideration of demographics. In our view, the identified housing mix should include a significant number of bungalows as the greatest rise within the age groups occurs in the 65 plus band. This will influence build cost, densities and sales values and is fundamental on any strategic site. ● Garages should be added into the build cost calculation. ● No allowance has been made for Abnormals. This should be included or, alternatively, the contingency should be increased accordingly. ● No allowance is made for planning or promotion costs. ● An allowance should be made for Services. These are becoming increasingly expensive particularly given the increased requirements anticipated through the Future Homes Standards Consultation. ● There is a concern that the £5,000 allowance for energy efficiency measures is too low. 	
23091 Norfolk Wildlife Trust	Comment	<ul style="list-style-type: none"> ● Many species could be lost due to a 2 degree temperature rise, we therefore recommend plan takes every opportunity to help reach national carbon neutrality goals as soon as possible, locking in gains for climate change mitigation and adaptation in all new development. Should include zero carbon targets for new housing in line with examples set by Reading Borough Council in policy H5 of their local plan. ● Recommend mandatory requirement for development to include green design features such as green roofs, walls and sustainable drainage. 	Note comments when considering policy 3 (environment).

		<ul style="list-style-type: none"> • Not identified any allocation which would result in direct loss of County Wildlife Sites (CWS') although a few have boundaries with draft policies to safeguard and manage them as GI. • Remainder of proposed allocation in proximity to wildlife sites (SAC, SPA, Ramsar, SSSI, CWS, Ancient Woodland, Local Nature Reserves, Protected Road Verges) some reference adjacent CWS and support safeguarding from indirect impacts and buffering with new GI, but not all. Recommend all allocations reviewed against these criteria to ensure appropriate policy wording is included to safeguard them from damaging development and ensure compliance with plans targets. • Environmental bill progressing through parliament includes mandatory Biodiversity Net Gain (BNG) provisions for all new developments and the creation of Nature Recovery Networks (NRNs). DEFRA has consulted on a metric to measure BNG, which is available for use. Natural England have advice on establishing NRNs and highlights importance of planning system to successfully create and maintain them. We recognise Environmental Bill hasn't been passed yet, it is likely to be before next consultation stage. Recommend detailed consideration given to how GNLP will help deliver measurable BNG in all new development and ensure the development of GI will help deliver an effective NRN for Norfolk. Happy to discuss with GNLP team once Bill has passed and requirements are clear. 	
23148 Hopkins Homes via Bidwells	Comment	<p>The following comments relate to the Greater Norwich Local Plan, Interim Viability Study, prepared by NPS Group (November 19).</p> <p>Whilst there is general support for the approach adopted and the collaborative approach that the GNLP Team are seeking to adopt, there is concern that the assumptions made within the Viability Study in relation to, amongst other things, sales values, build costs and benchmark land values are too generic</p>	Consider comments through additional work on the viability study

		<p>and not backed up by comparable evidence. A few specific comments are provided below:</p> <ul style="list-style-type: none"> • The assumed land values are too low and not representative of market values. <p>Comparable evidence needs to be provided to justify the figures used.</p> <ul style="list-style-type: none"> • Garages should be added into the build cost calculation. • No allowance has been made for Abnormals. This should be included or, alternatively, the contingency should be increased accordingly. • No allowance is made for planning or promotion costs. • An allowance should be made for Services. These are becoming increasingly expensive particularly given the increased requirements anticipated through the Future Homes Standards Consultation. • There is a concern that the £5,000 allowance for energy efficiency measures is too low. • The affordable rent values are included at 60% of Open Market Values. Based on recent evidence we would suggest that this figure should be between 45%/50% of open market value. • The intermediate units (Affordable Homes Ownership) are included at 75% of OMV. Based on recent evidence we would suggest that assuming a shared ownership model, the figure should be between 65% of open market value. 	
23151 Gladman Development	Comment	<ul style="list-style-type: none"> • Duty to Cooperate is a legal requirement. The NPPD needs Statement(s) of Common Ground to demonstrate the plan is based on effective cooperation's and based on agreements made by neighbouring authorities. 	Consider whether further work, perhaps with neighbouring authorities in Suffolk, is required to address the requirements of the Duty to

		<ul style="list-style-type: none"> Coventry, Mid Sussex, Castle Point and St Albans Local Plans were recommended for non-adoption by a Planning Inspector because this wasn't met. Norfolk has a strong history of cross-boundary cooperation and engagement, this needs to continue with evidence of ongoing working and mechanisms for this to continue beyond adoption of GNLP to meet legal requirements and soundness tests. 	Cooperate. Existing and ongoing work on the Norfolk Strategic Planning Framework is intended to cover this issue.
23188 Persimmon Homes (Anglia) via Bidwells	Comment	<p>Viability Inputs</p> <p>127. Revenues are overstated and unsubstantiated.</p> <p>128. Discounts to affordable rent tenure are too low and do not reflect registered provider bids in the current market.</p> <p>129. Build costs adopted are below BCIS median rates. No explanation or rationale is provided for this.</p> <p>130. Build costs make no allowance for Part L of the 2020 Building Regulations nor for regulations M49") and M4(3).</p> <p>131. The allowance for Site and Infrastructure works is likely to prove inadequate for most schemes. This allowance should not include the cost of garages which are a build cost.</p> <p>132. Benchmark land values have been reduced by 30% from the 2017 Hamson report without any reference to data, reasoning or justification. The levels adopted are likely to prevent land coming forward for development.</p> <p>133. The outcome of using the inputs chosen in the interim study produces appraisals that very significantly over-state viability.</p> <p>Typologies</p> <p>134. We have focussed only on Typology 9 in this report. We make no comment about any other typologies.</p> <p>135. A Typology for large (1,000 unit plus) schemes should be provided</p>	Consider comments through additional work on the viability study

		<p>accounting for the specific infrastructure and community facilities these sites are expected to provide.</p> <p>136. Without this typology, the study cannot be considered complete.</p> <p>Appraisals</p> <p>137. Based on our review of Typology 9 only, we consider the methodology adopted in the preparation of the appraisals to be sound.</p> <p>138. We cannot calculate the interest charges to match those used in the interim study, but this is not unusual when comparing viabilities.</p> <p>General</p> <p>139. We are concerned that the instructions to the consultant that prepared the interim study are not made clear in the report. We are also concerned that there may be a conflict of interest that has not been declared.</p> <p>140. Both issues undermine the veracity of the report and its conclusions, especially when combined with the consistent adoption of inputs that improve viability.</p> <p>141. We are especially concerned at the lack of background data, reasoning and justification for many of the inputs to the interim study.</p> <p>142. We therefore conclude that the NPS Interim Viability Study does not provide a reliable, robust or accurate assessment of viability for the purposes of the emerging GNLP.</p>	
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